

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

LA UNIÓN DEL PUEBLO ENTERO, et	§	
al.,	§	
<i>Plaintiffs,</i>	§	
	§	
v.	§	5:21-CV-0844-XR
	§	(Consolidated cases)
	§	
GREGORY W. ABBOTT, et al.,	§	
<i>Defendants.</i>	§	

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**RENEWED MOTION TO INTERVENE OF HARRIS COUNTY REPUBLICAN PARTY,  
DALLAS COUNTY REPUBLICAN PARTY, REPUBLICAN NATIONAL COMMITTEE,  
NATIONAL REPUBLICAN SENATORIAL COMMITTEE, AND  
NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE**

The Harris County Republican Party, Dallas County Republican Party, Republican National Committee (“RNC”), National Republican Senatorial Committee (“NRSC”), and National Republican Congressional Committee (“NRCC”) (collectively, “Republican Committees”) respectfully renew their motion to intervene as defendants in these consolidated cases under Federal Rule of Civil Procedure 24.<sup>1</sup>

For the reasons stated by the U.S. Court of Appeals for the Fifth Circuit, *La Union del Pueblo Entero v. Abbott*, 29 F.4th 299 (5th Cir. 2022), the Republican Committees have satisfied Rule 24(a)(2)’s requirements for intervention as of right. Namely, “[t]he Committees made a timely application to intervene by right, they claim interests relating to SB 1 which is the subject

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<sup>1</sup> The OCA-Greater Houston Plaintiffs, Mi Familia Vota Plaintiffs, LUPE Plaintiffs, Houston Area Urban League Plaintiffs, LULAC Plaintiffs, Travis County Defendants, and Harris County Elections Administrator Isabel Longoria oppose the relief requested in this motion. The United States does not oppose the relief requested in this motion. Counsel for the remaining parties did not respond to undersigned counsel’s request for their position before the motion was filed.

of this consolidated suit, their absence from the suit may practically impede their ability to protect their interests, and the existing parties might not adequately represent those interests.” *Id.* at 309.

No party sought rehearing or rehearing *en banc* of the Fifth Circuit’s decision within the 45-day period provided by the rules, *see* Fed. R App. P. 40(a)(1), which expired on Monday, May 9. Accordingly, the Republican Committees respectfully ask the Court to grant their renewed motion to intervene as defendants in these cases. As required by Rule 24(c), a proposed answer for each of the consolidated lawsuits is attached.

May 11, 2022

Respectfully submitted,

/s/ John M. Gore

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*Counsel for Proposed Intervenor-Defendants*

*\*Pro hac vice* applications forthcoming

\*\*Application for admission to the Western District of Texas pending

Admitted in Pennsylvania

Not admitted in D.C. (directly supervised by John M. Gore, a licensed D.C. Bar member)

**CERTIFICATE OF SERVICE**

I hereby certify that on May 11, 2022, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of this filing to all counsel of record.

/s/ John M. Gore

*Counsel for Proposed Intervenor-Defendants*

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**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

La Unión Del Pueblo Entero, *et al.*,

*Plaintiffs,*

v.

No. 5:21-cv-00844-XR

Gregory W. Abbott, *et al.*,

*Defendants.*

**HARRIS COUNTY REPUBLICAN PARTY, DALLAS COUNTY REPUBLICAN PARTY,  
REPUBLICAN NATIONAL COMMITTEE, NATIONAL REPUBLICAN SENATORIAL  
COMMITTEE, AND NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE’S  
[PROPOSED] ANSWER TO SECOND AMENDED COMPLAINT**

Intervenor-Defendants Harris County Republican Party, Dallas County Republican Party, Republican National Committee, National Republican Senatorial Committee, and National Republican Congressional Committee (the “Republican Committees”) respectfully answer Plaintiffs’ Complaint. Any allegation in the Complaint not explicitly responded to in this Answer is hereby denied.

**INTRODUCTION**

1. The Republican Committees support free and fair elections for all Texans and for all voters across the country. The statements of public officials speak for themselves and do not require a response. To the extent that a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the remaining allegations in Paragraph 1 and so deny them.

2. The Republican Committees admit that the Texas Legislature enacted SB 1. The Republican Committees deny that SB 1 “suppress[es] Texas voters” or that Plaintiffs’ descriptions

of the law and its effects are accurate. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 2 and so deny them. The statute speaks for itself and does not require a response. Paragraph 2 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

3. The Republican Committees admit that Gregory W. Abbott is the Governor of Texas. The Republican Committees deny that SB 1 was enacted for “pretextual” reasons and deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford v. Marion County Election Board*, 553 U.S. 181, 196 (2008). Legislative history speaks for itself and does not require a response. Paragraph 3 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 3 and so deny them.

4. The Republican Committees deny that SB 1 is a “reaction” to any demographic changes in the electorate, that claims of threats to election integrity are “baseless,” that it is hard to vote in Texas elections, or that SB 1 makes it “harder” to vote. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 4 and so deny them.

5. The statutes speak for themselves and do not require a response. Paragraph 5 states legal conclusions and/or statements of what the law provides or should provide, to which no

response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 5 and so deny them.

6. The Republican Committees deny that Plaintiffs are entitled to relief.

### **JURISDICTION AND VENUE**

7. Paragraph 7 states legal conclusions that do not require a response. To the extent a response is required, the Republican Committees deny these allegations.

8. Paragraph 8 states a legal conclusion that does not require a response. To the extent a response is required, the Republican Committees do not contest venue; and, except as expressly admitted, the Republican Committees deny any remaining allegations in Paragraph 8.

### **PARTIES**

9. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 9 and so deny them.

10. Paragraph 10 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 10 and so deny them.

11. Paragraph 11 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 11 and so deny them.

12. Paragraph 12 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 12 and so deny them.

13. Paragraph 13 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 13 and so deny them.

14. Paragraph 14 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 14 and so deny them.

15. Paragraph 15 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 15 and so deny them.

16. Paragraph 16 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information

sufficient to form a belief about the truth of the remaining allegations in Paragraph 16 and so deny them.

17. Paragraph 17 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 17 and so deny them.

18. Paragraph 18 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 18 and so deny them.

19. Paragraph 19 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 19 and so deny them.

20. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 20 and so deny them.

21. The Republican Committees admit that the State of Texas is one of the States of the United States of America.

22. The Republican Committees admit that Defendant Scott is the Secretary of State of Texas. Statutes and court decisions speak for themselves and do not require a response. Paragraph



22 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

23. Court decisions speak for themselves and do not require a response. Paragraph 23 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 23 and so deny them.

24. The statutes speak for themselves and do not require a response. Paragraph 24 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

25. Statutes and court decisions speak for themselves and do not require a response. Paragraph 25 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

26. The statute speaks for itself and does not require a response. Paragraph 26 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 26 and so deny them.

27. Statutes and court decisions speak for themselves and do not require a response. Paragraph 27 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

28. The statutes speak for themselves and do not require a response. Paragraph 28 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

29. The statute speaks for itself and does not require a response. Paragraph 29 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

30. The statute speaks for itself and does not require a response. Paragraph 30 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

31. The statutes speak for themselves and do not require a response. Paragraph 31 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 31 and so deny them.

32. The statute speaks for itself and does not require a response. Paragraph 32 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

33. Statements on a government website speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 33 and so deny them.

34. Statutes and statements on a government website speak for themselves and do not require a response. Paragraph 34 states legal conclusions and/or statements of what the law

provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 34 and so deny them.

35. The statute speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 35 and so deny them.

36. The Republican Committees admit that Defendant Paxton is the Attorney General of Texas and that Plaintiffs purport to sue him in his official capacity.

37. Court decisions speak for themselves and do not require a response. Paragraph 37 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

38. Statements on a government website and in press releases speak for themselves and do not require a response. Paragraph 38 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 38 and so deny them.

39. Court decisions, statutes, and court filings speak for themselves and do not require a response. Paragraph 39 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 39 and so deny them.

40. The statutes speak for themselves and do not require a response. Paragraph 40 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

41. Court decisions and filings speak for themselves and do not require a response. Paragraph 41 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 41 and so deny them.

42. The statements of public officials speak for themselves and do not require a response. Paragraph 42 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 42 and so deny them.

43. The Republican Committees admit that Defendant Scarpello is the Elections Administrator of Dallas County and that Plaintiffs purport to sue him in his official capacity.

44. The Republican Committees admit that Defendant Wise is the Elections Administrator of El Paso County and that Plaintiffs purport to sue her in her official capacity.

45. The statutes speak for themselves and do not require a response. Paragraph 45 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 45 and so deny them.

46. The statute speaks for itself and does not require a response. Paragraph 46 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

47. The statute speaks for itself and does not require a response. Paragraph 47 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

48. The Republican Committees admit that Defendant Cruzot is the Dallas County District Attorney and that Plaintiffs purport to sue him in his official capacity.

49. The Republican Committees admit that Defendant Rosales is the El Paso County District Attorney and that Plaintiffs purport to sue her in her official capacity.

50. The Republican Committees admit that Defendant Garza is the Travis County District Attorney and that Plaintiffs purport to sue him in his official capacity.

51. The statutes speak for themselves and do not require a response. Paragraph 51 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

52. Paragraph 52 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

#### **FACT BACKGROUND**

53. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history. The Republican Committees deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. Court decisions speak for themselves. Paragraph 53 states legal conclusions and/or statements of what the law provides or should

provide, to which no response is required. To the extent a response is required, these allegations are denied.

54. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history. The Republican Committees deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 54 and so deny them.

55. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history. The Republican Committees deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. Paragraph 55 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. Court decisions speak for themselves and do not require a response. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 55 and so deny them.

56. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history. The Republican Committees deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. Paragraph 56 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 56 and so deny them.

57. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history. The Republican Committees deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 57 and so deny them.

58. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history. The Republican Committees deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 58 and so deny them.

59. Court decisions speak for themselves and do not require a response. Paragraph 59 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

60. Court decisions speak for themselves and do not require a response. Paragraph 60 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

61. Court decisions and statements made in media articles speak for themselves and do not require a response. Paragraph 61 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 61 and so deny them.

62. The Republican Committees deny that Texas voting procedures are “onerous.” Statements made in media articles speak for themselves and do not require a response. Paragraph 62 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 62 and so deny them.

63. The referenced report and statutes speak for themselves and do not require a response. Paragraph 63 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 63 and so deny them.

64. Voter turnout and Census Bureau data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 64 and so deny them.

65. Voter turnout data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 65 and so deny them.

66. Voter turnout data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 66 and so deny them.



67. Statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 67 and so deny them.

68. Voter turnout data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 68 and so deny them.

69. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 69 and so deny them.

70. The referenced guidance speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 70 and so deny them.

71. The referenced guidance speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 71 and so deny them.

72. The referenced proclamation speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 72 and so deny them.

73. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 73 and so deny them.

74. Statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge

or information sufficient to form a belief about the truth of the allegations in Paragraph 74 and so deny them.

75. Voter turnout data and statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 75 and so deny them.

76. Statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 76 and so deny them.

77. The Republican Committees deny that Governor Abbott or Attorney General Paxton “impos[ed] obstacles that limited exercise of the franchise.” The statements of public officials speak for themselves and do not require a response. Paragraph 77 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 77 and so deny them.

78. The statements of public officials speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 78 and so deny them.

79. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,”

voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. The statements of public officials and statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 79 and so deny them.

80. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. Statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 80 and so deny them.

81. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 81 and so deny them.

82. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the

legitimacy or importance of the State's interest" in combatting it. *Crawford*, 553 U.S. at 196. The referenced source speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 82 and so deny them.

83. The Republican Committees deny that SB 1 contains any "restrictions designed to intimidate and discourage Texas voters and, in particular, Texas's minority voters." Legislative history speaks for itself and does not require a response. Paragraph 83 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

84. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 84 and so deny them.

85. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 85 and so deny them.

86. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 86 and so deny them.

87. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 87 and so deny them.

88. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 88 and so deny them.

89. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 89 and so deny them.

90. The statements of public officials speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 90 and so deny them.

91. The Republican Committees admit that Governor Abbott signed SB 1 into law on September 7, 2021.

92. Paragraph 92 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

93. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 93 and so deny them.

94. The statements of public officials speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 94 and so deny them.

95. The statements of public officials and on a government website speak for themselves and do not require a response. To the extent a response is required, the Republican

Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 95 and so deny them.

96. The statements of public officials and on a government website speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 96 and so deny them.

97. The statements of public officials and on a government website speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 97 and so deny them.

98. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. The statements of public officials and press releases speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 98 and so deny them.

99. The statements of public officials speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 99 and so deny them.

100. The statements of public officials speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 100 and so deny them.

101. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 101 and so deny them.

102. The Republican Committees deny the allegations in Paragraph 102.

103. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 103 and so deny them.

104. The Republican Committees deny that SB 1 “targets” any eligible voter. The statute speaks for itself and does not require a response. Paragraph 104 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 104 and so deny them.

105. The referenced data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 105 and so deny them.

106. Government health data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 106 and so deny them.

107. The Republican Committees deny that SB 1 “imposes . . . new restrictions” on voter assistance. The statute speaks for itself and does not require a response. Paragraph 107 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

108. The Republican Committees deny that the assistor’s oath is “onerous” or “intimidating.” The statute speaks for itself and does not require a response. Paragraph 108 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

109. The Republican Committees deny that the assistor’s oath will deter voters who need assistance or individuals from serving as assistors. The statute speaks for itself and does not require a response. Paragraph 109 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

110. The statute speaks for itself and does not require a response. Paragraph 110 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.



111. The statute speaks for itself and does not require a response. Paragraph 111 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 111 and so deny them.

112. The statutes speak for themselves and do not require a response. Paragraph 112 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 112 and so deny them.

113. The Republican Committees deny that SB 1 will burden the right to vote of those seeking assistance. The statutes speak for themselves and do not require a response. Paragraph 113 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 113 and so deny them.

114. The statutes speak for themselves and do not require a response. Paragraph 114 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 114 and so deny them.

115. The Republican Committees deny that SB 1 will “reduc[e] access to voting for voters who need assistance,” “depriv[e] them of assistance by their chosen assistors,” or “deter

voter assistance.” The statutes speak for themselves and do not require a response. Paragraph 115 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 115 and so deny them.

116. Paragraph 116 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

117. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 117 and so deny them.

118. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. Statements made in a video speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 118 and so deny them.

119. The statute speaks for itself and does not require a response. The Republican Committees deny that SB 1 makes the work of election workers harder. Paragraph 119 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

120. The statute speaks for itself and does not require a response. The Republican Committees deny that SB 1 limits the ability of election officials and election judges to manage

unruly poll watchers. Paragraph 120 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

121. The statute speaks for itself and does not require a response. Paragraph 121 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

122. The statute speaks for itself and does not require a response. The Republican Committees deny that SB 1 permits poll watchers to intimidate voters or cause disruptions. Paragraph 122 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

123. The statute speaks for itself and does not require a response. Paragraph 123 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

124. The statutes speak for themselves and do not require a response. Paragraph 124 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

125. The statute speaks for itself and does not require a response. Paragraph 125 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

126. The Republican Committees deny the allegations in Paragraph 126.

127. The statutes speak for themselves and do not require a response. Paragraph 127 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

128. The statute speaks for itself and does not require a response. Paragraph 128 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

129. Paragraph 129 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

130. Paragraph 130 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 130 and so deny them.

131. The Republican Committees deny that SB 1 imposes burdens on voters. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 131 and so deny them.

132. Paragraph 132 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 132 and so deny them.

133. The statutes and referenced article speak for themselves and do not require a response. Paragraph 133 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 133 and so deny them.

134. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. The statute and referenced report speak for themselves and do not require a response. Paragraph 134 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 134 and so deny them.

135. The statutes speak for themselves and do not require a response. Paragraph 135 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

136. The statutes speak for themselves and do not require a response. Paragraph 136 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

137. The Republican Committees deny that SB 1 “takes aim at community-based organizations.” The statute speaks for itself and does not require a response. Paragraph 137 states

legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

138. The statutes speak for themselves and do not require a response. Paragraph 138 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

139. The statute speaks for itself and does not require a response. Paragraph 139 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

140. The statute speaks for itself and does not require a response. Paragraph 140 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

141. The statutes speak for themselves and do not require a response. Paragraph 141 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 141 and so deny them.

142. Paragraph 142 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 142 and so deny them.

143. The Republican Committees deny that “SB 1 will reduce voter participation.” Paragraph 143 states legal conclusions and/or statements of what the law provides or should

provide, to which no response is required. To the extent a response is required, these allegations are denied.

144. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. Paragraph 144 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 144 and so deny them.

145. The Republican Committees deny that SB 1 will have a chilling effect on voter registration. The statute speaks for itself and does not require a response. Paragraph 145 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 145 and so deny them.

146. The statute speaks for itself and does not require a response. Paragraph 146 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 146 and so deny them.

147. The statutes speak for themselves and do not require a response. Paragraph 147 states legal conclusions and/or statements of what the law provides or should provide, to which no

response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 147 and so deny them.

148. The statutes speak for themselves and do not require a response. Paragraph 148 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 148 and so deny them. Footnote 130 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

149. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 149 and so deny them.

150. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 150 and so deny them.

151. Paragraph 151 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 151 and so deny them.

152. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 152 and so deny them.

153. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 153 and so deny them.



154. Paragraph 154 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 154 and so deny them.

155. Paragraph 155 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 155 and so deny them.

156. Paragraph 156 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 156 and so deny them.

157. Paragraph 157 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 157 and so deny them.

158. Paragraph 158 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information

sufficient to form a belief about the truth of the remaining allegations in Paragraph 158 and so deny them.

159. The Republican Committees deny that SB 1 permits poll watchers to intimidate voters. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 159 and so deny them.

160. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 160 and so deny them.

161. The Republican Committees deny that SB 1 will deter anyone from serving as an assistor. Paragraph 161 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 161 and so deny them.

162. The Republican Committees deny that SB 1 has negative effects. Paragraph 162 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 162 and so deny them.

163. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 163 and so deny them.

164. The Republican Committees deny that SB 1 will reduce the number of people available to assist voters, reduce turnout of voters who rely on assistance, or subject anyone to felony prosecution for assisting voters in accordance with the law. Paragraph 164 states legal

conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 164 and so deny them.

165. The Republican Committees deny that SB 1 will reduce the number of people available to assist voters, reduce turnout of voters who rely on assistance, or subject anyone to felony prosecution for assisting voters in accordance with the law. Paragraph 165 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 165 and so deny them.

166. The Republican Committees deny that SB 1 will reduce the number of people available to assist voters, reduce turnout of voters who rely on assistance, or subject anyone to felony prosecution for assisting voters in accordance with the law. Paragraph 166 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 166 and so deny them.

167. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 167 and so deny them.

168. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 168 and so deny them.

169. The Republican Committees deny that Plaintiff's alleged confusion or fears about SB 1 are reasonable. Paragraph 169 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 169 and so deny them.

170. The Republican Committees deny that SB 1's provisions are confusing or vague. Paragraph 170 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 170 and so deny them.

171. Paragraph 171 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 171 and so deny them.

172. The Republican Committees deny that SB 1 "criminalize[s]" voter assistance and deny that Plaintiff's concerns are reasonable. Paragraph 172 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 172 and so deny them.

173. The Republican Committees deny that SB 1's provisions are confusing or vague. Paragraph 173 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 173 and so deny them.

174. Paragraph 174 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 174 and so deny them.

175. The Republican Committees deny that SB 1 has negative effects. The statute speaks for itself and does not require a response. Paragraph 175 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 175 and so deny them.

176. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 176 and so deny them.

177. Paragraph 177 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 177 and so deny them.

178. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 178 and so deny them.

179. The Republican Committees deny that SB 1 will deter anyone from serving as an assistor. Paragraph 179 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 179 and so deny them.

180. The Republican Committees deny that SB 1 will reduce the number of people available to assist voters, reduce turnout of voters who rely on assistance, or subject anyone to felony prosecution for assisting voters in accordance with the law. Paragraph 180 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 180 and so deny them.

181. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 181 and so deny them.

182. Paragraph 182 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 182 and so deny them.

183. Paragraph 183 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 183 and so deny them.

184. The Republican Committees deny that SB 1 imposes burdens on mail voting. Paragraph 184 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 184 and so deny them.

185. The Republican Committees deny that SB 1 will deter anyone from assisting eligible voters. Paragraph 185 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 185 and so deny them.

186. The Republican Committees deny that SB 1's provisions are onerous, confusing, or vague. Paragraph 186 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 186 and so deny them.

187. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 187 and so deny them.

188. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 188 and so deny them.

189. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 189 and so deny them.

190. The Republican Committees deny that SB 1 will deter anyone from serving as an assistor. Paragraph 190 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 190 and so deny them.

191. The Republican Committees deny that SB 1 will injure anyone. Paragraph 191 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 191 and so deny them.

192. The Republican Committees deny that SB 1 has negative effects. Paragraph 192 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 192 and so deny them.



193. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 193 and so deny them.

194. Paragraph 194 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 194 and so deny them.

195. The Republican Committees deny that SB 1 has negative effects. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 195 and so deny them.

196. Paragraph 196 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 196 and so deny them.

197. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 197 and so deny them. The Republican Committees specifically deny that SB 1 permits poll watchers to intimidate voters.

198. The Republican Committees deny that SB 1 imposes “barriers” on mail voting. Paragraph 198 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 198 and so deny them.

199. The Republican Committees deny that SB 1 permits poll watchers to intimidate or harass voters. Paragraph 199 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 199 and so deny them.

200. The Republican Committees deny that SB 1 “suppress[es] Latino voters,” “depress[es] Latino turnout,” or decreases the interest in or convenience of voting. Paragraph 200 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 200 and so deny them.

201. Paragraph 201 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 201 and so deny them.

202. The Republican Committees deny that SB 1 has negative effects. Paragraph 202 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 202 and so deny them.

203. The statute speaks for itself and does not require a response. Paragraph 203 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 203 and so deny them.

204. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 204 and so deny them.

205. The Republican Committees deny that SB 1 will deter anyone from serving as an assistor. Paragraph 205 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 205 and so deny them.

206. The Republican Committees deny that SB 1 will reduce the number of people available to assist voters, reduce turnout of voters who rely on assistance, or subject anyone to felony prosecution for assisting voters in accordance with the law. Paragraph 206 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 206 and so deny them.

207. Paragraph 207 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information

sufficient to form a belief about the truth of the remaining allegations in Paragraph 207 and so deny them.

208. The Republican Committees deny that SB 1's provisions are confusing or vague. Paragraph 208 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 208 and so deny them.

209. Paragraph 209 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 209 and so deny them.

210. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 210 and so deny them.

211. Paragraph 211 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 211 and so deny them.

212. The Republican Committees deny that SB 1 will deter anyone from serving as an assistor. Paragraph 212 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information

sufficient to form a belief about the truth of the remaining allegations in Paragraph 212 and so deny them.

213. The Republican Committees deny that SB 1 will reduce the number of people available to assist voters, reduce turnout of voters who rely on assistance, or subject anyone to felony prosecution for assisting voters in accordance with the law. Paragraph 213 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 213 and so deny them.

214. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 214 and so deny them.

215. Paragraph 215 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 215 and so deny them.

216. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 216 and so deny them.

217. The statute speaks for itself and does not require a response. Paragraph 217 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 217 and so deny them.

## COUNT I

218. The Republican Committees incorporate their responses to the preceding paragraphs.

219. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees deny that SB 1 unlawfully infringes on the right to vote.

220. Court decisions speak for themselves and do not require a response. Paragraph 220 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

221. Court decisions speak for themselves and do not require a response. Paragraph 221 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

222. The statutes speak for themselves and do not require a response. Paragraph 222 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

223. The Republican Committees deny that SB 1 “imposes severe burdens on” or denies the right to vote. Paragraph 223 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 223 and so deny them.

224. The Republican Committees deny that SB 1 “imposes severe burdens on” or denies the right to vote. Paragraph 224 states legal conclusions and/or statements of what the law provides

or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 224 and so deny them.

225. The Republican Committees deny that SB 1 “imposes severe burdens on” or denies the right to vote. Paragraph 225 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 225 and so deny them.

226. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. Paragraph 226 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 226 and so deny them.

227. The Republican Committees deny that SB 1 will disenfranchise anyone. Paragraph 227 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 227 and so deny them.

228. The Republican Committees deny that SB 1 will deter election officials from taking action against “intimidating behavior” or make it more likely that anyone “will be subject to abuse in and around polling places.” Paragraph 228 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 228 and so deny them.

229. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. The Republican Committees deny that SB 1 was “pretext[ual].” Paragraph 229 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

## COUNT II

230. The Republican Committees incorporate their responses to the preceding paragraphs.

231. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees deny that SB 1 unlawfully infringes on the right to vote.

232. The Fourteenth Amendment speaks for itself and does not require a response.

233. The Fourteenth Amendment and court decisions speak for themselves and do not require a response. Paragraph 233 states legal conclusions and/or statements of what the law



provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

234. The Republican Committees deny that SB 1 was enacted “with the intent to discriminate against voters of color, on the basis of race and national origin.” Paragraph 234 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

235. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. The Republican Committees deny that SB 1 was “pretext[ual].” Paragraph 235 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

236. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history. The Republican Committees deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. Court decisions speak for themselves and do not require a response. Paragraph 236 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

237. Voter turnout data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 237 and so deny them.

238. The Republican Committees deny that SB 1 “target[s]” or “disproportionately burden[s]” anyone. Paragraph 238 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

239. The Republican Committees deny that SB 1 has a “disparate racial impact.” Legislative history speaks for itself and does not require a response. Paragraph 239 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

240. The Republican Committees deny that SB 1 “burdens” anyone’s right to vote. Paragraph 240 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

241. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history. The Republican Committees deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. Paragraph 241 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

### **COUNT III**

242. The Republican Committees incorporate their responses to the preceding paragraphs.

243. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees deny that SB 1 unlawfully infringes on the right to vote.

244. The Fifteenth Amendment to the U.S. Constitution speaks for itself and does not require a response.

245. The Fifteenth Amendment and court decisions speak for themselves and do not require a response. Paragraph 245 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

246. Court decisions speak for themselves and do not require a response. Paragraph 246 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

247. The Republican Committees deny that SB 1 was enacted “with the intent to discriminate against voters of color, on the basis of race and national origin.” Paragraph 247 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

248. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. The Republican Committees deny that SB 1 was “pretext[ual].” Paragraph 248 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

249. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history. The Republican Committees deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. Paragraph 249 states legal conclusions and/or

statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

250. Voter turnout data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 250 and so deny them.

251. The Republican Committees deny that SB 1 “target[s]” or “disproportionately burden[s]” anyone. Paragraph 251 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

252. The Republican Committees deny that SB 1 has a “disparate racial impact.” Legislative history speaks for itself and does not require a response. Paragraph 252 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

253. The Republican Committees deny that SB 1 “burdens” anyone’s right to vote. Paragraph 253 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

254. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history. The Republican Committees deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. Paragraph 254 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

#### COUNT IV

255. The Republican Committees incorporate their responses to the preceding paragraphs.

256. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees deny that SB 1 unlawfully infringes on the right to vote.

257. The Voting Rights Act speaks for itself and does not require a response.

258. The Voting Rights Act and court decisions speak for themselves and do not require a response. Paragraph 258 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

259. Court decisions speak for themselves and do not require a response. Paragraph 259 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

260. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. The Republican Committees deny that SB 1 was “pretext[ual].” Paragraph 260 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

261. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history. The Republican Committees deny that this history is relevant to SB 1 or

that SB 1 was motivated by racial discrimination. Paragraph 261 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

262. Voter turnout data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 262 and so deny them.

263. The Republican Committees deny that SB 1 “target[s]” or “disproportionately burden[s]” anyone. Paragraph 263 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

264. The Republican Committees deny that SB 1 “burdens” anyone’s right to vote. Paragraph 264 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

265. The Republican Committees deny that SB 1 “burdens” anyone’s right to vote. Paragraph 265 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

## **COUNT V**

266. The Republican Committees incorporate their responses to the preceding paragraphs.

267. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees deny that SB 1 unlawfully infringes on the right to vote.

268. The Voting Rights Act speaks for itself and does not require a response.

269. The Voting Rights Act speaks for itself and does not require a response. Paragraph 269 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

270. The Republican Committees deny that SB 1 “imped[e]” voters’ ability to get assistance or deters individuals from providing assistance to voters. Paragraph 270 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

271. The Republican Committees deny that SB 1 violates Section 208 of the Voting Rights Act. Court decisions speak for themselves and do not require a response. Paragraph 271 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

## COUNT VI

272. The Republican Committees incorporate their responses to the preceding paragraphs.

273. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees deny that SB 1 unlawfully infringes on the right to vote.

274. The Americans with Disabilities Act (ADA) speaks for itself and does not require a response. Paragraph 274 states legal conclusions and/or statements of what the law provides or

should provide, to which no response is required. To the extent a response is required, these allegations are denied.

275. The ADA and regulations speak for themselves and do not require a response. Paragraph 275 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

276. The ADA speaks for itself and does not require a response. Paragraph 276 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

277. The ADA and court decisions speak for themselves and do not require a response. Paragraph 277 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

278. Paragraph 278 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

279. The ADA speaks for itself and does not require a response. Paragraph 279 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 279 and so deny them.

280. The Republican Committees deny that SB 1 “burdens” any voter, “den[ies] voters with disabilities equal access to the franchise,” or “prevent[s ] voters from exercising their



fundamental right to vote.” Paragraph 280 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

281. The Republican Committees deny that SB 1 “discriminate[s]” against any qualified voters. The statutes speak for themselves and do not require a response. Paragraph 281 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

282. The Republican Committees deny that SB 1 “discriminate[s]” against Plaintiffs. Paragraph 282 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 282 and so deny them.

283. Paragraph 283 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 283 and so deny them.

284. Paragraph 284 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 284 and so deny them.

285. Paragraph 285 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 285 and so deny them.

## COUNT VII

286. The Republican Committees incorporate their responses to the preceding paragraphs.

287. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees deny that SB 1 unlawfully infringes on the right to vote.

288. The Fourteenth Amendment and court decisions speak for themselves and do not require a response. Paragraph 288 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

289. The First Amendment and court decisions speak for themselves and do not require a response. Paragraph 289 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

290. The Republican Committees deny that SB 1 is unconstitutional. Paragraph 290 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

291. The Republican Committees deny that SB 1 is unconstitutional. The statutes speak for themselves and do not require a response. Paragraph 291 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

292. The Republican Committees deny that SB 1 is unconstitutional. The statute speaks for itself and does not require a response. Paragraph 292 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

293. The Republican Committees deny that SB 1 is unconstitutional. Paragraph 293 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

294. The Republican Committees deny that SB 1 is unconstitutional. The statute speaks for itself and does not require a response. Paragraph 294 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

295. The Republican Committees deny that SB 1 is unconstitutional. The statute speaks for itself and does not require a response. Paragraph 295 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

296. The First and Fourteenth Amendments and court decisions speak for themselves and do not require a response. Paragraph 296 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

297. The Republican Committees deny that SB 1 is unconstitutional. The statute and court decisions speak for themselves and do not require a response. Paragraph 297 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

298. The Republican Committees deny that SB 1 “will have a chilling effect” on organizations that “employ paid canvassers and conduct GOTV activities.” Paragraph 298 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

299. The Republican Committees deny that SB 1 is unconstitutional. The statutes speak for themselves and do not require a response. Paragraph 299 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

300. The Republican Committees deny that SB 1 is unconstitutional. Paragraph 300 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

#### **COUNT VIII**

301. The Republican Committees incorporate their responses to the preceding paragraphs.

302. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees deny that SB 1 unlawfully infringes on the right to vote.

303. The statute speaks for itself and does not require a response. Paragraph 303 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

304. The statute speaks for itself and does not require a response. Paragraph 304 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

305. The Republican Committees deny that SB 1 is unconstitutional. The statute speaks for itself and does not require a response. Paragraph 305 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

306. The Republican Committees deny that SB 1 is unconstitutional. Paragraph 306 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

307. The statute speaks for itself and does not require a response. Paragraph 307 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

308. The statute speaks for itself and does not require a response. Paragraph 308 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

309. The Republican Committees deny that SB 1 is unconstitutional or that Plaintiffs are entitled to relief. Paragraph 309 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

## **COUNT IX**

310. The Republican Committees incorporate their responses to the preceding paragraphs.

311. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees deny that SB 1 unlawfully infringes on the right to vote.

312. The Republican Committees deny that SB 1 is unconstitutional. Paragraph 312 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

313. The Republican Committees deny that SB 1 is unconstitutional. Paragraph 313 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

314. The Republican Committees deny that SB 1 is unconstitutional or that Plaintiffs are entitled to relief. Paragraph 314 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

## **PRAYER FOR RELIEF**

The Republican Committees deny that Plaintiffs are entitled to the relief requested.

## **AFFIRMATIVE AND OTHER DEFENSES**

Without assuming the burden of proof, and while reserving the right to assert all applicable affirmative defenses supported in law and fact, the Republican Committees assert the following affirmative defenses:

### **FIRST AFFIRMATIVE DEFENSE**

The Court lacks subject matter jurisdiction over Plaintiffs' claims.

### **SECOND AFFIRMATIVE DEFENSE**

The Complaint fails to allege sufficient facts upon which a claim for relief may be granted.

### **THIRD AFFIRMATIVE DEFENSE**

Plaintiffs lack standing to assert their claims in the Complaint.

### **FOURTH AFFIRMATIVE DEFENSE**

Plaintiffs' claims are barred by the applicable statutes of limitations.

### **FIFTH AFFIRMATIVE DEFENSE**

Plaintiffs' claims are barred by the equitable doctrines of laches, estoppel, unclean hands, and/or waiver.

### **SIXTH AFFIRMATIVE DEFENSE**

Plaintiffs have failed to join indispensable parties to this action.

### **CONCLUSION**

The Republican Committees respectfully request that the Court (1) dismiss Plaintiffs' claims with prejudice and enter judgment for Defendants; (2) deny Plaintiffs' prayer for relief; and (3) grant other such relief as the Court may deem proper.

May 11, 2022

Respectfully submitted,

/s/ John M. Gore

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\**Pro hac vice* applications forthcoming

\*\*Application for admission to the Western

District of Texas pending

Admitted in Pennsylvania

Not admitted in D.C. (directly supervised by  
John M. Gore, a licensed D.C. Bar member)



**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

LULAC Texas, *et al.*,

*Plaintiffs,*

v.

Jose Esparza, *et al.*,

*Defendants.*

No. 1:21-cv-00786-XR

Consolidated with *La Unión del Pueblo  
Entero v. Abbott*, No. 5:21-cv-844

**HARRIS COUNTY REPUBLICAN PARTY, DALLAS COUNTY REPUBLICAN PARTY,  
REPUBLICAN NATIONAL COMMITTEE, NATIONAL REPUBLICAN SENATORIAL  
COMMITTEE, AND NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE’S  
[PROPOSED] ANSWER TO SECOND AMENDED COMPLAINT**

Intervenor-Defendants Harris County Republican Party, Dallas County Republican Party, Republican National Committee, National Republican Senatorial Committee, and National Republican Congressional Committee (the “Republican Committees”) respectfully answer Plaintiffs’ Complaint. Any allegation in the Complaint not explicitly responded to in this Answer is hereby denied.

**INTRODUCTION**

1. The Republican Committees deny that Texas officials are engaged in an “ongoing campaign” to “limit access to the franchise.” The Republican Committees are without knowledge or information sufficient to form a belief as to the remaining allegations in Paragraph 1 and so deny them.

2. The Republican Committees deny that Texas officials “took affirmative steps to make voting harder” in the 2020 election and that “the State did almost nothing to facilitate access to the

ballot box.” The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 2 and so deny them.

3. The Republican Committees deny that “extraordinary obstacles” were imposed on voters or election workers or that voters had to “navigate restrictive election administration procedures.” Voter turnout data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 3 and so deny them.

4. The Republican Committees deny that “state officials attempted to obstruct” voter access. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 4 and so deny them.

5. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 5 and so deny them.

6. Voter turnout data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 6 and so deny them.

7. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history but deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. The Republican Committees deny the remaining allegations in Paragraph 7.

8. The Republican Committees deny that SB 7 constituted a “voter suppression bill.” Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 8 and so deny them.

9. The Republican Committees deny that SB 1 constitutes “voter suppression” legislation. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 9 and so deny them.

10. The Republican Committees deny that SB 1 is “unlawful,” constitutes “voter suppression” legislation, “burdens voters,” or that its provisions are “[s]uppressive.” The statute and legislative history speak for themselves and do not require a response. Paragraph 10 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 10 and so deny them.

11. The Republican Committees deny the allegations in Paragraph 11.

12. The Republican Committees deny that SB 1 has “burdensome and disenfranchising effects” or was “intended to impose a particular burden on Texas’s Black and Latino communities.” Paragraph 12 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, the Republican Committees deny these allegations.

13. The Republican Committees deny that Plaintiffs are entitled to relief.

#### **JURISDICTION AND VENUE**

14. Paragraph 14 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, the Republican Committees deny these allegations.

15. Paragraph 15 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, the Republican Committees deny these allegations.

16. Paragraph 16 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, the Republican Committees deny these allegations.

17. Paragraph 17 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, the Republican Committees do not contest venue; and, except as expressly admitted, the Republican Committees deny any remaining allegations in Paragraph 17.

18. Paragraph 18 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, the Republican Committees deny these allegations.

#### **PARTIES**

19. Paragraph 19 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, the Republican Committees deny the allegation regarding Plaintiffs' alleged injuries. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 19 and so deny them.

20. The Republican Committees deny that SB 1 "erects new barriers to voting that impose significant burdens" on voters. Paragraph 20 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or

information sufficient to form a belief about the truth of the remaining allegations in Paragraph 20 and so deny them.

21. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 21 and so deny them.

22. The Republican Committees deny that SB 1 “impede[s] access to the franchise” or imposes any harms on Plaintiff or its constituency. Paragraph 22 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 22 and so deny them.

23. The Republican Committees deny that the challenged provisions of SB 1 “threaten to deprive” anyone of “the right to vote and have their votes counted.” Paragraph 23 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 23 and so deny them.

24. The Republican Committees deny that SB 1 “burden[s] or denie[s]” the right to vote. Paragraph 24 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 24 and so deny them.

25. The Republican Committees deny that the challenged provisions of SB 1 “burden” the right to vote or place anyone at “risk of disenfranchisement.” Paragraph 25 states legal

conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 25 and so deny them.

26. The Republican Committees admit that Defendant Esparza is the Deputy Secretary of State of Texas and that Plaintiffs purport to sue him in his official capacity. The statutes speak for themselves and do not require a response. Paragraph 26 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 26 and so deny them.

27. The Republican Committees admit that Defendant Paxton is the Attorney General of Texas and that Plaintiffs purport to sue him in his official capacity. Court decisions and filings speak for themselves and do not require a response. Paragraph 27 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 27 and so deny them.

28. The Republican Committees admit that Defendant Callanen is the Bexar County Elections Administrator and that Plaintiffs purport to sue her in her official capacity. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 28 and so deny them.

29. The Republican Committees admit that Defendant Gonzalez is the Bexar County District Attorney and that Plaintiffs purport to sue him in his official capacity. Paragraph 29 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 29 and so deny them.

30. The Republican Committees admit that Defendant DeBeauvoir is the Travis County Clerk and that Plaintiffs purport to sue her in her official capacity. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 30 and so deny them.

31. The Republican Committees admit that Defendant Garza is the Travis County District Attorney and that Plaintiffs purport to sue him in his official capacity. Paragraph 31 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 31 and so deny them.

32. The Republican Committees admit that Defendant Longoria is the Harris County Elections Administrator and that Plaintiffs purport to sue her in her official capacity. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 32 and so deny them.

33. The Republican Committees admit that Defendant Ogg is the Harris County District Attorney and that Plaintiffs purport to sue her in her official capacity. Paragraph 33 states legal conclusions and/or statements of what the law provides or should provide, to which no response

is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 33 and so deny them.

34. The Republican Committees admit that Defendant Ramón is the Hidalgo County Elections Administrator and that Plaintiffs purport to sue her in her official capacity. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 31 and so deny them.

35. The Republican Committees admit that Defendant Rodriguez, Jr. is the Hidalgo County District Attorney and that Plaintiffs purport to sue him in his official capacity. Paragraph 35 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 35 and so deny them.

36. The Republican Committees admit that Defendant Scarpello is the Dallas County Elections Administrator and that Plaintiffs purport to sue him in his official capacity. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 36 and so deny them.

37. The Republican Committees admit that Defendant Creuzot is the Dallas County District Attorney and that Plaintiffs purport to sue him in his official capacity. Paragraph 37 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 37 and so deny them.



38. The Republican Committees admit that Defendant Wise is the El Paso County Elections Administrator and that Plaintiffs purport to sue her in her official capacity. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 33 and so deny them.

39. The Republican Committees admit that Defendant Rosales is the District Attorney for the 34th Judicial District and that Plaintiffs purport to sue her in her official capacity. Paragraph 39 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 39 and so deny them.

#### **STATEMENT OF FACTS AND LAW**

40. The Republican Committees deny that Texas voting laws are “restrictive.” The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 40 and so deny them.

41. The Republican Committees deny that Texas voting laws impose “obstacles” on voters. Voter turnout data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 41 and so deny them.

42. Demographic data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 42 and so deny them.

43. Voter turnout data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 43 and so deny them.

44. Election results speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 44 and so deny them.

45. Election results speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 45 and so deny them.

46. Election results speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 46 and so deny them.

47. Voter turnout data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 47 and so deny them.

48. Voter turnout data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 48 and so deny them.

49. Voter turnout data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 49 and so deny them.

50. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 50 and so deny them.

51. Voter turnout data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 51 and so deny them.

52. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 52 and so deny them.

53. Voter turnout data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 53 and so deny them.

54. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 54 and so deny them.

55. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 55 and so deny them.

56. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 56 and so deny them.

57. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 57 and so deny them.

58. Demographic data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 58 and so deny them.

59. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 59 and so deny them.

60. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 60 and so deny them.

61. Voter turnout data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 61 and so deny them.

62. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 62 and so deny them.

63. Voter turnout data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 63 and so deny them.

64. Voter turnout data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 64 and so deny them.

65. Exit poll data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 65 and so deny them.

66. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 66 and so deny them.

67. Voter turnout data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 67 and so deny them.

68. The Republican Committees deny the allegations in Paragraph 68.

69. Governor Abbott's proclamation speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or

information sufficient to form a belief about the truth of the allegations in Paragraph 69 and so deny them.

70. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 70 and so deny them.

71. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 71 and so deny them.

72. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 72 and so deny them.

73. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 73 and so deny them.

74. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 74 and so deny them.

75. The Republican Committees deny that Republican officials or party leaders engaged in “suppressive actions.” The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford v. Marion County Election Board*, 553 U.S. 181, 196 (2008). The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 75 and so deny them.

76. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the

legitimacy or importance of the State's interest" in combatting it. *Crawford*, 553 U.S. at 196 .The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 76 and so deny them.

77. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the "risk of voter fraud" is "real," voter fraud "could affect the outcome of a close election," and "[t]here is no question about the legitimacy or importance of the State's interest" in combatting it. *Crawford*, 553 U.S. at 196 . The statements of public officials speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 77 and so deny them.

78. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the "risk of voter fraud" is "real," voter fraud "could affect the outcome of a close election," and "[t]here is no question about the legitimacy or importance of the State's interest" in combatting it. *Crawford*, 553 U.S. at 196 . The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 78 and so deny them.

79. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the "risk of voter fraud" is "real," voter fraud "could affect the outcome of a close election," and "[t]here is no question about the legitimacy or importance of the State's interest" in combatting it. *Crawford*, 553 U.S. at 196. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 79 and so deny them.

80. The statements of public officials speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 80 and so deny them.

81. The statements of public officials speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 81 and so deny them.

82. The Republican Committees deny the allegations in Paragraph 82.

83. The statements of public officials speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 83 and so deny them.

84. Court decisions speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 84 and so deny them.

85. Statements made in legal briefs speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 85 and so deny them.

86. The statements of public officials speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge

or information sufficient to form a belief about the truth of the allegations in Paragraph 86 and so deny them.

87. Court decisions speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 87 and so deny them.

88. The Republican Committees deny the allegations in Paragraph 88.

89. Statements made in court filings speak for themselves and do not require a response. Paragraph 89 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 89 and so deny them.

90. The statements of public officials speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 90 and so deny them.

91. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 91 and so deny them.

92. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 92 and so deny them.

93. The Republican Committees deny that Texas's Republican leaders sought to pass legislation "that targeted mechanisms disproportionately used by Texas's minority voters." The



Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 93 and so deny them.

94. The Republican Committees deny that SB 7 would have had “suppressive effects” or that the legislature lacked “legitimate justification for enacting it.” Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 94 and so deny them.

95. The Republican Committees deny that SB 7 contained “anti-voting provisions from voter suppression bills.” Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 95 and so deny them

96. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 96 and so deny them.

97. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 97 and so deny them.

98. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 98 and so deny them.

99. The statements of public officials speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge

or information sufficient to form a belief about the truth of the allegations in Paragraph 99 and so deny them.

100. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 100 and so deny them.

101. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 101 and so deny them.

102. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 102 and so deny them.

103. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 103 and so deny them.

104. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 104 and so deny them.

105. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 105 and so deny them.

106. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 106 and so deny them.

107. The Republican Committees deny that HB 6 would have had “suppressive effects.” Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 107 and so deny them.

108. The Republican Committees deny that HB 6 contained “voter suppression tactics.” Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 108 and so deny them.

109. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 109 and so deny them.

110. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 110 and so deny them.

111. The Republican Committees deny that HB 6 would have had a “harmful, discriminatory impact” or that SB 7 would have placed “burdens” on any voters. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 111 and so deny them.

112. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 112 and so deny them.

113. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 113 and so deny them.

114. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 114 and so deny them.

115. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 115 and so deny them.

116. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 116 and so deny them.

117. The Republican Committees deny that SB 7 had “racist roots.” Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 117 and so deny them.

118. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history but deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. Legislative history and provisions of the Texas Constitution speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 118 and so deny them.

119. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 119 and so deny them.

120. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 120 and so deny them.

121. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 121 and so deny them.

122. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 122 and so deny them.

123. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 123 and so deny them.

124. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 124 and so deny them.

125. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 125 and so deny them.

126. The statements of public officials speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 126 and so deny them.

127. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 127 and so deny them.

128. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 128 and so deny them.

129. Legislative history speaks for itself and does not require a response. Paragraph 129 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 129 and so deny them.

130. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 130 and so deny them.

131. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 131 and so deny them.

132. The Republican Committees deny the allegations in Paragraph 132.

133. The statements of public officials speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 133 and so deny them.

134. The statements of public officials speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 134 and so deny them.

135. The Republican Committees deny the allegations in Paragraph 135.

136. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 136 and so deny them.

137. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 137 and so deny them.

138. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 138 and so deny them.

139. The Republican Committees deny that SB 1 “suppress[es] the right to vote.” Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 139 and so deny them.

140. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 140 and so deny them.

141. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 141 and so deny them.

142. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 142 and so deny them.

143. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 143 and so deny them.

144. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 144 and so deny them.

145. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 145 and so deny them.

146. The Republican Committees deny the allegations in Paragraph 146.



147. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 147 and so deny them.

148. The Republican Committees deny that the bills were “voter suppression bills.” Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 148 and so deny them.

149. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 149 and so deny them.

150. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees deny the goal of the special legislative session was passage of “restrictive voter suppression legislation.”

151. The Republican Committees deny that SB 1 has “disenfranchising effects.” Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 151 and so deny them.

152. The Republican Committees deny that “SB 1 is designed to—and, if enforced, will—burden the franchise for lawful voters.” Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 152 and so deny them.

153. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 153 and so deny them.

154. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 154 and so deny them.

155. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 155 and so deny them.

156. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 156 and so deny them.

157. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 157 and so deny them.

158. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 158 and so deny them.

159. The Republican Committees admit that Governor Abbott signed SB 1 into law on September 7, 2021.

160. The Republican Committees deny that the referenced provisions of SB 1 set forth in Paragraph 160 are “[s]uppressive.” The statute speaks for itself and does not require a response. Paragraph 160 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations

are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 160 and so deny them.

161. The statute speaks for itself and does not require a response. Paragraph 161 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 161 and so deny them.

162. The statute speaks for itself and does not require a response. Paragraph 162 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

163. The statute speaks for itself and does not require a response. Paragraph 163 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

164. The Republican Committees deny that SB 1 “burden[s]” absentee voters. The statutes speak for themselves and do not require a response. Paragraph 164 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

165. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 165 and so deny them.

166. The statute speaks for itself and does not require a response. Paragraph 166 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The

Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 166 and so deny them.

167. The Republican Committees deny that SB 1 “burden[s]” voters. Paragraph 167 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

168. The statutes speak for themselves and do not require a response. Paragraph 168 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 168 and so deny them.

169. The statute speaks for itself and does not require a response. Paragraph 169 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 169 and so deny them.

170. The statute speaks for itself and does not require a response. Paragraph 170 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 170 and so deny them. The Republican Committees specifically deny that proponents of SB 1 sought to prohibit methods of voting for being “too convenient.”

171. The statute speaks for itself and does not require a response. Paragraph 171 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees specifically deny that SB 1 makes it difficult to obtain assistance while voting in person.

172. The statutes speak for themselves and do not require a response. Paragraph 172 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 172 and so deny them.

173. The statute speaks for itself and does not require a response. Paragraph 173 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

174. The statutes speak for themselves and do not require a response. Paragraph 174 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

175. The Republican Committees deny that Texas has a “hyper-criminalized electoral system.” The statute speaks for itself and does not require a response. Paragraph 175 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

176. The Republican Committees deny the allegations in Paragraph 176.

177. The Republican Committees deny the allegations in Paragraph 177.

178. The statute speaks for itself and does not require a response. Paragraph 178 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

179. The Republican Committees deny that the referenced provisions “specifically target the early voting hours” used by “larger and more diverse counties.” The statute speaks for itself and does not require a response. Paragraph 179 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 179 and so deny them.

180. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 180 and so deny them.

181. The statute speaks for itself and does not require a response. Paragraph 181 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 181 and so deny them.

182. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 182 and so deny them.

183. The statute speaks for itself and does not require a response. Paragraph 183 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The

Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 183 and so deny them.

184. The statute speaks for itself and does not require a response. Paragraph 184 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 184 and so deny them.

185. The Republican Committees deny that SB 1 allows poll watchers to “intimidate voters.” The statute speaks for itself and does not require a response. Paragraph 185 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 185 and so deny them.

186. The statutes speak for themselves and do not require a response. Paragraph 186 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

187. The statute speaks for itself and does not require a response. Paragraph 187 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

188. The statute speaks for itself and does not require a response. Paragraph 188 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

189. Paragraph 189 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 189 and so deny them.

190. The Republican Committees deny that Texas “knowingly and directly invited voter intimidation.” The statute speaks for itself and does not require a response. Paragraph 190 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 190 and so deny them.

191. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history but deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 191 and so deny them.

192. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 192 and so deny them.

193. Paragraph 193 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 193 and so deny them.



194. Paragraph 194 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 194 and so deny them.

195. The Republican Committees deny that SB 1 “invite[s]” voter intimidation. Paragraph 195 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 195 and so deny them.

196. The Republican Committees deny the allegations in Paragraph 196.

197. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. Legislative history speaks for itself and does not require a response. Paragraph 197 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 197 and so deny them.

198. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the

legitimacy or importance of the State's interest" in combatting it. *Crawford*, 553 U.S. at 196. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 198 and so deny them.

199. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 199 and so deny them.

200. Paragraph 200 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 200 and so deny them.

201. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 201 and so deny them.

202. The Republican Committees deny the allegations in Paragraph 202.

203. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 203 and so deny them.

204. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 204 and so deny them.

205. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the "risk of voter fraud" is "real," voter fraud "could affect the outcome of a close election," and "[t]here is no question about the legitimacy or importance of the State's interest" in combatting it. *Crawford*, 553 U.S. at 196.

Paragraph 205 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 205 and so deny them.

206. The Republican Committees deny the allegations in Paragraph 206.

207. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history but deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. Court decisions speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 207 and so deny them.

208. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history but deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 208 and so deny them.

209. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history but deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 209 and so deny them.

210. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history but deny that this history is relevant to SB 1 or that SB 1 was motivated

by racial discrimination. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 210 and so deny them.

211. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history but deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 211 and so deny them.

212. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history but deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. Court decisions speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 212 and so deny them.

213. Census Bureau statistics speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 213 and so deny them.

214. Census Bureau statistics speak for themselves and do not require a response. To the extent a response is required, The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 214 and so deny them.

215. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 215 and so deny them.

216. The Republican Committees deny the allegations in Paragraph 216. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history but deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination.

217. The referenced report and court decisions speak for themselves and do not require a response. Paragraph 217 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

218. Court decisions speak for themselves and do not require a response. Paragraph 218 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

219. Court decisions speak for themselves and do not require a response. Paragraph 219 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

220. Court decisions speak for themselves and do not require a response. Paragraph 220 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

221. The Republican Committees deny that Texas “suppress[es] minority political participation.” The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 221 and so deny them.

222. Paragraph 222 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these

allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 222 and so deny them.

223. Court decisions speak for themselves and do not require a response. Paragraph 223 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 223 and so deny them.

224. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 224 and so deny them.

225. The statements of public officials speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 225 and so deny them.

226. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 226 and so deny them.

227. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 227 and so deny them.

228. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 228 and so deny them.

229. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 229 and so deny them.

230. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 230 and so deny them.

231. Statements made in volunteer recruitment videos speak for themselves and do not require a response. The Republican Committees deny that the allegations accurately describe the video, and the Republican Committees deny it encourages voter intimidation.

232. The Republican Committees deny that Senator Cruz or his campaign resorted to racial appeals. Statements made by public officials and in political advertisements speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 232 and so deny them.

233. The statements made in political advertisements speak for themselves and do not require a response. The Republican Committees deny that the Fort Bend County Republican Party resorted to racial appeals.

234. The Republican Committees deny that Rep. Sessions resorted to racial appeals. The statements made by public officials and in political advertisements speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 234 and so deny them.

235. Statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 235 and so deny them.

236. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 236 and so deny them.

237. Statements made by public officials speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 237 and so deny them.

238. The Republican Committees deny that Senator Cornyn or his campaign resorted to racial appeals. Statements made by public officials and in political advertisements speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 238 and so deny them.

239. The Republican Committees deny that Senator Cornyn resorted to racial appeals. Statements made by public officials speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 235 and so deny them.

240. Statements made by political candidates speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 240 and so deny them.

241. Court decisions speak for themselves and do not require a response. Paragraph 241 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 241 and so deny them.



242. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 242 and so deny them.

243. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 243 and so deny them.

244. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 244 and so deny them.

245. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 245 and so deny them.

246. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 246 and so deny them.

247. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 247 and so deny them.

248. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 248 and so deny them.

### **COUNT I**

249. The Republican Committees incorporate their responses to the preceding paragraphs.

250. The Voting Rights Act and court decisions and statutes speak for themselves and do not require a response. Paragraph 250 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

251. Court decisions speak for themselves and do not require a response. Paragraph 251 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

252. The Republican Committees deny that “a racially discriminatory purpose was a motivating factor in the passage of SB 1.” Paragraph 252 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 252 and so deny them.

253. Paragraph 253 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees specifically deny that SB 1 “surgically target[s] election practices employed in Texas’s largest and most diverse jurisdictions” or that it was “intended to disproportionately restrict access to the franchise for Black and Hispanic voters.”

254. The Republican Committees deny that SB 1 has “harmful effects.” The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 254 and so deny them.

255. Court decisions speak for themselves and do not require a response. Paragraph 255 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 255 and so deny them.

256. Paragraph 256 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

## COUNT II

257. The Republican Committees incorporate their responses to the preceding paragraphs.

258. The First and Fourteenth Amendments to the U.S. Constitution speak for themselves and do not require a response. Paragraph 258 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

259. Court decisions speak for themselves and do not require a response. Paragraph 259 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

260. Court decisions speak for themselves and do not require a response. Paragraph 260 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

261. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees deny that SB 1 unlawfully infringes on the right to vote. The Republican Committees specifically deny that SB 1 creates “burdens” or “obstacles” to vote or “[e]mpower[s]” or “encourage[s]” harassment or intimidation of voters. The statute speaks for itself and does not require a response. Paragraph 261 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

262. The Republican Committees deny the allegations in Paragraph 262.

263. Paragraph 263 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 263 and so deny them.

264. The Republican Committees deny that SB 1 imposes “obstacles” on any voters. Paragraph 264 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 264 and so deny them.

265. The Republican Committees deny that SB 1 permits “intimidating behavior.” Paragraph 265 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 265 and so deny them.

266. The Republican Committees deny the allegations in Paragraph 266.

267. The Republican Committees deny that SB 1 “restrict[s] access to the franchise as a shield against demographic and partisan changes.” Court decisions speak for themselves and do not require a response. Paragraph 267 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

268. The Republican Committees deny that SB 1 “target[s]” any communities. Paragraph 268 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

269. The Republican Committees deny that “partisan and disenfranchising considerations fueled SB 1.” Paragraph 269 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

270. Paragraph 270 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 270 and so deny them.

271. The Republican Committees deny that SB 1 will “increase[ the] risk of intimidation and harassment at the polls” of any individual. Paragraph 271 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 271 and so deny them.

272. The Republican Committees deny that SB 1 imposes “burdens” on voters. Paragraph 272 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

### COUNT III

273. The Republican Committees incorporate their responses to the preceding paragraphs.

274. The First Amendment to the U.S. Constitution and court decisions speak for themselves and do not require a response. Paragraph 274 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

275. Court decisions speak for themselves and do not require a response. Paragraph 275 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

276. Court decisions speak for themselves and do not require a response. Paragraph 276 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

277. The statute speaks for itself and does not require a response. Paragraph 277 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

278. The statute speaks for itself and does not require a response. Paragraph 278 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

279. The statute speaks for itself and does not require a response. Paragraph 279 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

280. Court decisions speak for themselves and do not require a response. Paragraph 280 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

281. The statute speaks for itself and does not require a response. Paragraph 281 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 281 and so deny them.

282. The statute speaks for itself and does not require a response. Paragraph 282 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 282 and so deny them.

283. Paragraph 283 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 283 and so deny them.

284. The Republican Committees deny that any provision of SB 1 violates the First Amendment. The statute speaks for itself and does not require a response. Paragraph 284 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The

Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 284 and so deny them.

285. The Republican Committees deny that SB 1 will “chill[]” the protected speech of any individual. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 285 and so deny them.

286. The Republican Committees deny the allegations in Paragraph 286.

#### **COUNT IV**

287. The Republican Committees incorporate their responses to the preceding paragraphs.

288. Section 208 of the Voting Rights Act speaks for itself and does not require a response.

289. Legislative history speaks for itself and does not require a response. Paragraph 289 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

290. The statute and court decisions speak for themselves and do not require a response. Paragraph 290 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

291. The statute speaks for itself and does not require a response. Paragraph 291 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.



292. The statute speaks for itself and does not require a response. Paragraph 292 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

293. The statute speaks for itself and does not require a response. Paragraph 293 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 193 and so deny them.

294. Paragraph 294 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

#### **PRAYER FOR RELIEF**

The Republican Committees deny that Plaintiffs are entitled to the relief requested.

#### **AFFIRMATIVE AND OTHER DEFENSES**

Without assuming the burden of proof, and while reserving the right to assert all applicable affirmative defenses supported in law and fact, the Republican Committees assert the following affirmative defenses:

##### **FIRST AFFIRMATIVE DEFENSE**

The Court lacks subject matter jurisdiction over Plaintiffs' claims.

##### **SECOND AFFIRMATIVE DEFENSE**

The Complaint fails to allege sufficient facts upon which a claim for relief may be granted.

### **THIRD AFFIRMATIVE DEFENSE**

Plaintiffs lack standing to assert their claims in the Complaint.

### **FOURTH AFFIRMATIVE DEFENSE**

Plaintiffs' claims are barred by the applicable statutes of limitations.

### **FIFTH AFFIRMATIVE DEFENSE**

Plaintiffs' claims are barred by the equitable doctrines of laches, estoppel, unclean hands, and/or waiver.

### **SIXTH AFFIRMATIVE DEFENSE**

Plaintiffs have failed to join indispensable parties to this action.

### **CONCLUSION**

The Republican Committees respectfully request that the Court (1) dismiss Plaintiffs' claims with prejudice and enter judgment for Defendants; (2) deny Plaintiffs' prayer for relief; and (3) grant other such relief as the Court may deem proper.

May 11, 2022

Respectfully submitted,

/s/ John M. Gore

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\**Pro hac vice* applications forthcoming

\*\*Application for admission to the Western

District of Texas pending

Admitted in Pennsylvania

Not admitted in D.C. (directly supervised by  
John M. Gore, a licensed D.C. Bar member)

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

Houston Area Urban League, *et al.*,

*Plaintiffs,*

v.

Gregory Abbott, *et al.*,

*Defendants.*

No. 5:21-cv-00848-XR

Consolidated with *La Unión del Pueblo  
Entero v. Abbott*, No. 5:21-cv-844

**HARRIS COUNTY REPUBLICAN PARTY, DALLAS COUNTY REPUBLICAN PARTY,  
REPUBLICAN NATIONAL COMMITTEE, NATIONAL REPUBLICAN SENATORIAL  
COMMITTEE, AND NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE’S  
[PROPOSED] ANSWER TO SECOND AMENDED COMPLAINT**

Intervenor-Defendants Harris County Republican Party, Dallas County Republican Party, Republican National Committee, National Republican Senatorial Committee, and National Republican Congressional Committee (the “Republican Committees”) respectfully answer Plaintiffs’ Second Amended Complaint. Any allegation in the Complaint not explicitly responded to in this Answer is hereby denied.

**INTRODUCTION**

1. The Republican Committees deny that SB 1 unlawfully infringes on the right to vote. Statements of President Ronald Reagan speak for themselves and do not require a response. To the extent a response is required, the Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1.
2. Court decisions speak for themselves and do not require a response.
3. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history. The Republican Committees deny that this history is relevant to SB 1 or that SB 1

was motivated by racial discrimination. Voter turnout data and statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 3 and so deny them.

4. Voter turnout data and statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 4 and so deny them.
5. The Republican Committees deny that Texas election laws are exclusionary. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 5 and so deny them.
6. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 6 and so deny them.
7. Voter turnout data and statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 7 and so deny them.
8. Statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 8 and so deny them.
9. Statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or

information sufficient to form a belief about the truth of the allegations in Paragraph 9 and so deny them.

10. The Republican Committees deny that Texas “attempt[ed] to re-erect barriers to voting” or that the referenced actions were taken for racially discriminatory reasons. The referenced executive order, statements made in media articles, and court decisions speak for themselves and do not require a response. Paragraph 10 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 10 and so deny them.
11. Court decisions speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 11 and so deny them.
12. Statements made in media articles and the referenced report speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 12 and so deny them.
13. Voter turnout data and statements made in media articles and the referenced report speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 13 and so deny them.
14. Voter turnout data and statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are

without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 14 and so deny them.

15. The Republican Committees deny that Texas election laws impose “substantial barriers” to voting. Voter turnout data and statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 15 and so deny them.
16. Voter turnout data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 16 and so deny them.
17. The Republican Committees deny the allegations that Plaintiffs’ characterizations of SB 1 or its effects are accurate. The statute, voter turnout data, and statements made in media articles speak for themselves and do not require a response. Paragraph 17 states legal conclusions that do not require a response. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 17 and so deny them.
18. The Republican Committees deny that SB 1 imposes “heavy burdens on voters” or “prohibits counties from making voting accessible and safe.” Paragraph 18 states legal conclusions that do not require a response. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 18 and so deny them.
19. The Republican Committees deny that SB 1 was motivated by racial discrimination and that SB 1 makes it “harder for voters of color to vote.” Paragraph 19 states legal conclusions that

do not require a response. To the extent a response is required, these allegations are denied.

The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 19 and so deny them.

20. The Republican Committees deny that SB 1 was motivated by racial discrimination. Paragraph 20 states legal conclusions that do not require a response. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 20 and so deny them.

21. The Republican Committees deny that SB 1 “unduly burden[s] voters.” Paragraph 21 states legal conclusions that do not require a response. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 21 and so deny them.

22. Paragraph 22 states legal conclusions that do not require a response. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 22 and so deny them.

23. The Republican Committees deny that the risk of fraud in Texas elections “simply does not exist.” According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford v. Marion Cnty. Election Bd.*, 553 U.S. 181, 196 (2008). The statements of public officials speak for themselves and do not require a response. Paragraph 23 states legal conclusions that do not require a



response. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 23 and so deny them.

24. The Republican Committees deny that SB 1 was motivated by racial discrimination. Paragraph 24 states legal conclusions that do not require a response. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 24 and so deny them.

25. The Republican Committees admit that Governor Abbott signed SB 1 into law on September 7, 2021. The statute and its legislative history speak for themselves and do not require a response. Paragraph 25 states legal conclusions that do not require a response. To the extent a response is required, these allegations are denied.

26. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The statutes speak for themselves and do not require a response. To the extent a response is required, the Republican Committees otherwise deny the allegations in Paragraph 26, deny that Plaintiffs' claims have merit, and deny that Plaintiffs are entitled to relief.

27. The Republican Committees deny that SB 1 discriminates on the basis of race and that SB 1 "will harm all Texas voters." Paragraph 27 states legal conclusions that do not require a response. To the extent a response is required, these allegations are denied.

28. The Republican Committees deny that Plaintiffs are entitled to relief.

### **JURISDICTION AND VENUE**

29. Paragraph 29 states legal conclusions that do not require a response. To the extent a response is required, these allegations are denied.
30. Paragraph 30 states legal conclusions that do not require a response. To the extent a response is required, these allegations are denied.
31. Paragraph 31 states legal conclusions that do not require a response. To the extent a response is required, these allegations are denied.
32. Paragraph 32 states legal conclusions that do not require a response. To the extent a response is required, these allegations are denied.
33. Paragraph 33 states a legal conclusion that does not require a response. To the extent a response is required, the Republican Committees do not contest venue; and, except as expressly admitted, the Republican Committees deny any remaining allegations in Paragraph 33.

### **PARTIES**

34. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 34 and so deny them.
35. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 35 and so deny them.
36. Paragraph 36 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information

sufficient to form a belief about the truth of the remaining allegations in Paragraph 36 and so deny them.

37. Paragraph 37 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 37 and so deny them.

38. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 38 and so deny them.

39. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 39 and so deny them.

40. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 40 and so deny them.

41. The Republican Committees deny that Plaintiffs' characterization of SB 1 and its alleged effects is accurate. Paragraph 41 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 41 and so deny them.

42. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees are without

knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 42 and so deny them.

43. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 43 and so deny them.

44. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 44 and so deny them.

45. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 45 and so deny them.

46. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 46 and so deny them.

47. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 47 and so deny them.

48. The Republican Committees deny that SB 1 burdens or denies the right to vote. The Republican Committees deny that Plaintiffs' characterization of SB 1 and its alleged effects is accurate. Paragraph 48 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 48 and so deny them.

49. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. Court decisions speak for themselves and do not require a response. Footnote 22 to Paragraph 49 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a

response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 49 and so deny them.

50. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 50 and so deny them.

51. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 51 and so deny them.

52. The Republican Committees deny that SB 1 harms the disability community or suppresses the right to vote. Legislative history speaks for itself and does not require a response. Paragraph 52 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 52 and so deny them.

53. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 53 and so deny them.

54. Legislative history speaks for itself and does not require a response. Paragraph 54 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 54 and so deny them.

55. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 55 and so deny them.

56. The Republican Committees deny the allegations in Paragraph 56.
57. The Republican Committees deny that SB 1 has a “suppressive effect.” Paragraph 57 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 57 and so deny them.
58. Legislative history speaks for itself and does not require a response. Paragraph 58 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 58 and so deny them.
59. Paragraph 59 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 59 and so deny them.
60. Paragraph 60 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 60 and so deny them.
61. Paragraph 61 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these

allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 61 and so deny them.

62. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 62 and so deny them.

63. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 63 and so deny them.

64. Paragraph 64 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 64 and so deny them.

65. Paragraph 65 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 65 and so deny them.

66. The Republican Committees deny that SB 1 has negative effects. Paragraph 66 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The

Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 66 and so deny them.

67. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. Paragraph 67 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 67 and so deny them.

68. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. Paragraph 68 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 68 and so deny them.

69. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. Paragraph 69 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 69 and so deny them.

70. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees deny that SB 1 imposes criminal penalties for fulfilling the responsibilities of an election judge. Legislative



history speaks for itself and does not require a response. Paragraph 70 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 70 and so deny them.

71. The Republican Committees admit that Defendant Abbott is the Governor of Texas and that Plaintiffs purport to sue him in his official capacity.
72. The Republican Committees admit that Defendant Scott is the Secretary of State of Texas and that Plaintiffs purport to sue him in his official capacity. Paragraph 72 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.
73. The statutes speak for themselves and require no response. Paragraph 73 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.
74. The statutes speak for themselves and require no response. Paragraph 74 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 74 and so deny them.
75. The statutes speak for themselves and require no response. Paragraph 75 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

76. Statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 76 and so deny them.
77. The Republican Committees deny that SB 1 will “place undue burdens” on any voters. The Republican Committees admit that Defendant Ogg is the Harris County District Attorney and that Plaintiffs purport to sue her in her official capacity. Paragraph 77 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.
78. The Republican Committees deny that SB 1 will “place undue burdens” on any voters. The Republican Committees admit that Defendant Gonzales is the Bexar County District Attorney and that Plaintiffs purport to sue him in his official capacity. Paragraph 78 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.
79. The Republican Committees deny that SB 1 will “place undue burdens” on any voters. The Republican Committees admit that Defendant Garza is the Travis County District Attorney and that Plaintiffs purport to sue him in his official capacity. Paragraph 79 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.
80. The Republican Committees deny that SB 1 will “place undue burdens” on any voters. The Republican Committees admit that Defendant Paxton is the Attorney General of Texas. Paragraph 80 states legal conclusions and/or statements of what the law provides or should

provide, to which no response is required. To the extent a response is required, these allegations are denied.

81. The statutes speak for themselves and do not require a response. Paragraph 81 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

82. The statutes speak for themselves and do not require a response. Paragraph 82 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

83. The statements of public officials speak for themselves and do not require a response. Paragraph 83 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 83 and so deny them.

84. The Republican Committees admit that Defendant Callanen is the Bexar County Elections Administrator and that Plaintiffs purport to sue her in her official capacity. Paragraph 84 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

85. The Republican Committees admit that Defendant Longoria is the Harris County Elections Administrator and that Plaintiffs purport to sue her in her official capacity. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 85 and so deny them.

### GENERAL ALLEGATIONS

86. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history, but deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. Court decisions speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 86 and so deny them.
87. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history, but deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. Court decisions speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 87 and so deny them.
88. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history, but deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. Court decisions speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 88 and so deny them.
89. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history, but deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. Court decisions speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or

information sufficient to form a belief about the truth of the allegations in Paragraph 89 and so deny them.

90. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 90 and so deny them.

91. Court decisions speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 91 and so deny them.

92. Court decisions speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 92 and so deny them.

93. Court decisions speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 93 and so deny them.

94. Court decisions speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 94 and so deny them.

95. The Republican Committees admit that the Democratic Party adopted a rule limiting primary participation to white citizens and that the United States Supreme Court held that practice unconstitutional. Court decisions speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 95 and so deny them.

96. Court decisions speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 96 and so deny them.
97. Court decisions and statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 97 and so deny them.
98. Legislative history speaks for itself and does not require a response. Paragraph 98 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 98 and so deny them.
99. Legislative history and court cases speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 99 and so deny them.
100. Statements by government agencies, legislative history, and court decisions speak for themselves and do not require a response. Paragraph 100 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 100 and so deny them.

101. Court decisions and legislative history speak for themselves and do not require a response. Paragraph 101 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 101 and so deny them.
102. Court decisions speak for themselves and do not require a response. Paragraph 102 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 102 and so deny them.
103. Statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 103 and so deny them.
104. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 104 and so deny them.
105. The referenced sources speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 105 and so deny them.
106. Court decisions speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 106 and so deny them.

107. Government reports speak for themselves and do not require a response. Paragraph 107 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 107 and so deny them.
108. Court decisions, voter turnout data, and statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 108 and so deny them.
109. The referenced letter speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 109 and so deny them.
110. The statements of public officials, statements made in media articles, and court decisions speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 110 and so deny them.
111. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. Court decisions speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information



sufficient to form a belief about the truth of the remaining allegations in Paragraph 111 and so deny them.

112. The Republican Committees deny that SB 1 “imped[es], burden[s], [or] discriminat[es] against voters of color.” The Republican Committees deny the remaining allegations in paragraph 112.

113. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history, but deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. Court decisions speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 113 and so deny them.

114. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history, but deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. Court decisions and the referenced reports speak for themselves and do not require a response. Paragraph 114 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 114 and so deny them.

115. Court decisions and the referenced reports speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 115 and so deny them.

116. Court decisions, statements made in media articles, and the referenced reports speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 116 and so deny them.
117. The Republican Committees deny that Black and Latino Texans lack equal “ability to participate in the political process” and that SB 1 makes it harder for anyone to participate in the political process. Court decisions and the referenced report speak for themselves and do not require a response. Paragraph 117 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 117 and so deny them.
118. Court decisions speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 118 and so deny them.
119. Census Bureau data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 119 and so deny them.
120. The Republican Committees deny that SB 1 “seeks to curb voter participation” in any Texas county. Paragraph 120 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or

information sufficient to form a belief about the truth of the remaining allegations in Paragraph 120 and so deny them.

121. The Republican Committees deny that Texas election law imposes barriers on the right to vote. The referenced sources and voter turnout data speak for themselves and do not require a response. Paragraph 121 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 121 and so deny them.

122. The Republican Committees deny that SB 1 discriminates against anyone or denies anyone “equal access to the electoral process.” The referenced sources speak for themselves and do not require a response. Paragraph 122 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 122 and so deny them.

123. The referenced study and statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 123 and so deny them.

124. Paragraph 124 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information

sufficient to form a belief about the truth of the remaining allegations in Paragraph 124 and so deny them.

125. The statements of public officials speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 125 and so deny them.

126. Statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 126 and so deny them.

127. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 127 and so deny them.

128. Statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 128 and so deny them.

129. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 129 and so deny them.

130. The statutes speak for themselves and do not require a response. Paragraph 130 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 130 and so deny them.

131. Paragraph 131 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 131 and so deny them.
132. The statements of public officials speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 132 and so deny them.
133. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 133 and so deny them.
134. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 134 and so deny them.
135. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 135 and so deny them.
136. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 136 and so deny them.
137. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 137 and so deny them.
138. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 138 and so deny them.
139. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 139 and so deny them.

140. Paragraph 140 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 140 and so deny them.

141. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 141 and so deny them.

142. Paragraph 142 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 142 and so deny them.

143. The Republican Committees deny the allegations in Paragraph 143.

144. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. Legislative history and statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 144 and so deny them.

145. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,”

voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 145 and so deny them.

146. Legislative history and statements made in media articles speak for themselves and do not require a response. Paragraph 146 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 146 and so deny them.

147. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 147 and so deny them.

148. The legislation speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 148 and so deny them.

149. The referenced testimony speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 149 and so deny them.

150. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history, but deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. The testimony speaks for itself and does not require a response. To the

extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 150 and so deny them.

151. Statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 151 and so deny them.

152. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. The referenced sources speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 152 and so deny them.

153. Legislative history and statements made in media articles speak for themselves and do not require a response. Paragraph 153 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 153 and so deny them.

154. Legislative history and statements made in media articles speak for themselves and do not require a response. Paragraph 154 states legal conclusions and/or statements of what the law



provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 154 and so deny them.

155. Legislative history and statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 155 and so deny them.

156. Legislative history and statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 156 and so deny them.

157. Legislative history and the statements of public officials speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 157 and so deny them.

158. Legislative history and the statements of public officials speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 158 and so deny them.

159. Legislative history, the statements of public officials, and Census Bureau data speak for themselves and do not require a response. To the extent a response is required, the Republican

Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 159 and so deny them.

160. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 160 and so deny them.

161. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 161 and so deny them.

162. The Republican Committees deny that SB 7 would have had a discriminatory impact on voting. Legislative history and the statements of public officials speak for themselves and do not require a response. Paragraph 162 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 162 and so deny them.

163. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 163 and so deny them.

164. The Republican Committees deny that SB 7 would have had a disproportionate impact on large, urban counties or voters of color. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 164 and so deny them.

165. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. Legislative history and statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 165 and so deny them.
166. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 166 and so deny them.
167. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 167 and so deny them.
168. Legislative history and statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 168 and so deny them.
169. The Republican Committees deny that the intent of SB 1 is to “suppress voters” or that the legislation has “discriminatory intent” or “ties to white supremacy.” Legislative history and statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or

information sufficient to form a belief about the truth of the remaining allegations in Paragraph 169 and so deny them.

170. Legislative history and statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 170 and so deny them.

171. Legislative history and the referenced sources speak for themselves and do not require a response. Paragraph 171 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 171 and so deny them.

172. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 172 and so deny them.

173. Legislative history and statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 173 and so deny them.

174. The referenced sources speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 174 and so deny them.

175. The referenced sources speak for themselves and do not require a response. Paragraph 175 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 175 and so deny them.
176. Legislative history speaks for itself and does not require a response. Paragraph 176 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 176 and so deny them.
177. Legislative history speaks for itself and does not require a response. Paragraph 177 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 177 and so deny them.
178. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 178 and so deny them.
179. Legislative history and statements made in media articles speak for themselves and do not require a response. Paragraph 179 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or

information sufficient to form a belief about the truth of the remaining allegations in Paragraph 179 and so deny them.

180. Statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 180 and so deny them.

181. Statements made in media articles and the referenced proclamation speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 181 and so deny them.

182. Legislative history and statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 182 and so deny them.

183. Legislative history and statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 183 and so deny them.

184. Legislative history and statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 184 and so deny them.

185. Legislative history and statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 185 and so deny them.
186. Legislative history and statements made in media articles speak for themselves and do not require a response. Paragraph 186 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 186 and so deny them.
187. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. Legislative history, the statements of public officials, and statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 187 and so deny them.
188. Legislative history and statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 188 and so deny them.

189. Legislative history and statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 189 and so deny them.
190. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 190 and so deny them.
191. Legislative history and statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 191 and so deny them.
192. Legislative history and statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 192 and so deny them.
193. The Republican Committees admit that Governor Abbott signed SB 1 into law on September 7, 2021. Legislative history and statements made in media articles speak for themselves and do not require a response. Paragraph 193 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 193 and so deny them.



194. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history, but deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 194 and so deny them.
195. The Republican Committees deny that SB 1 “targets” any particular method of voting. The Republican Committees deny that Plaintiffs’ characterization of SB 1 and its alleged effects is accurate. Paragraph 195 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 195 and so deny them.
196. The statutes speak for themselves and do not require a response. Paragraph 196 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 196 and so deny them.
197. The statute speaks for itself and does not require a response. Paragraph 197 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The

Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 197 and so deny them.

198. The referenced sources speak for themselves and do not require a response. Paragraph 198 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 198 and so deny them.

199. The statute speaks for itself and does not require a response. Paragraph 199 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

200. The statutes speak for themselves and do not require a response. Paragraph 200 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

201. The statutes speak for themselves and do not require a response. Paragraph 201 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

202. Voter turnout data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 202 and so deny them.

203. Court decisions speak for themselves and do not require a response. Paragraph 203 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The

Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 203 and so deny them.

204. Statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 204 and so deny them.

205. The Republican Committees deny that SB 1 “discourages [or] dissuades” voters of color from voting or “increas[es] the costs of voting.” The statute speaks for itself and does not require a response. Paragraph 205 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 205 and so deny them.

206. The Republican Committees deny that SB 1 makes it more difficult for voters of color and voters with disabilities to cast a ballot in person. The statute speaks for itself and does not require a response. Paragraph 206 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 206 and so deny them.

207. The Republican Committees deny that SB 1 burdens Black and Latino voters. The statute speaks for itself and does not require a response. Paragraph 207 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To

the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 207 and so deny them.

208. Voter turnout and demographic data speak for themselves and do not require a response.

To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 208 and so deny them.

209. The Republican Committees deny that SB 1 “target[s]” any particular method and means of voting. Paragraph 209 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 209 and so deny them.

210. Voter turnout data and statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 210 and so deny them.

211. The referenced analysis speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 211 and so deny them.

212. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,”

voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. The statements of public officials speak for themselves and do not require a response. Paragraph 212 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 212 and so deny them.

213. The Republican Committees deny the allegations in Paragraph 213.

214. The Republican Committees deny that SB 1 “curtail[s] voters’ ability to obtain information” or “increas[es]” burdens on voters.” The statute and legislative history do not require a response. Paragraph 214 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 214 and so deny them.

215. The Republican Committees deny that SB 1 makes it more difficult for voters of color and voters with disabilities to cast a ballot in person. Paragraph 215 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 215 and so deny them.

216. The statutes speak for themselves and do not require a response. Paragraph 216 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.
217. The Republican Committees deny that SB 1 denies people with disabilities equal access to the early voting application process. The statutes speak for themselves and do not require a response. Paragraph 217 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 217 and so deny them.
218. The statutes speak for themselves and do not require a response. Paragraph 218 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.
219. The statutes speak for themselves and do not require a response. Paragraph 219 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.
220. The statute speaks for itself and does not require a response. Paragraph 220 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 220 and so deny them.
221. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,”

voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. The statute speaks for itself and does not require a response. Paragraph 221 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

222. The Republican Committees deny that SB 1 “burden[s]” voters. The statute speaks for itself and does not require a response. Paragraph 222 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

223. The statutes speak for themselves and do not require a response. Paragraph 223 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

224. The statutes speak for themselves and do not require a response. Paragraph 224 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

225. The Republican Committees deny that SB 1 “impedes early-mail-in voting” or “burdens voters.” The statutes speak for themselves and do not require a response. Paragraph 225 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 225 and so deny them.

226. The referenced sources speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information

sufficient to form a belief about the truth of the remaining allegations in Paragraph 226 and so deny them.

227. The Republican Committees deny that SB 1 “will increase voter and election official intimidation.” The statutes speak for themselves and do not require a response. Paragraph 227 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 227 and so deny them.

228. The Republican Committees deny that SB 1 undermines protections for voters. The statutes speak for themselves and do not require a response. Paragraph 228 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 228 and so deny them.

229. The statute speaks for itself and does not require a response. Paragraph 229 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

230. The statutes speak for themselves and do not require a response. Paragraph 230 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 230 and so deny them.



231. The statutes speak for themselves and do not require a response. Paragraph 231 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 231 and so deny them.
232. The Republican Committees deny the allegations in Paragraph 232.
233. The Republican Committees deny the allegations in Paragraph 233.
234. The statutes speak for themselves and do not require a response. Paragraph 234 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.
235. The Republican Committees deny that SB 1 imposes barriers on voters with disabilities, prevents eligible individuals from providing assistance, or denies anyone equal access to voting. The statutes speak for themselves and do not require a response. Paragraph 235 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 235 and so deny them.
236. The Republican Committees deny that SB 1 denies voters with disabilities equal access to voting. The statutes speak for themselves and do not require a response. Paragraph 236 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 236 and so deny them.

237. The Republican Committees deny that SB 1 poses an “undue burden” on any individual who needs assistance voting. The statutes speak for themselves and do not require a response. Paragraph 237 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 237 and so deny them.
238. The statutes speak for themselves and do not require a response. Paragraph 238 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.
239. The statutes speak for themselves and do not require a response. Paragraph 239 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 239 and so deny them.
240. The statutes speak for themselves and do not require a response. Paragraph 240 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 240 and so deny them.
241. The statutes speak for themselves and do not require a response. Paragraph 241 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

242. The statutes speak for themselves and do not require a response. Paragraph 242 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.
243. The Republican Committees deny that SB 1 is unconstitutional or “burden[s] the right of voters to vote during emergencies.” The statute speaks for itself and does not require a response. Paragraph 243 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 243 and so deny them.
244. The statutes speak for themselves and do not require a response. Paragraph 244 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.
245. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. The statements of public officials speak for themselves and do not require a response. Paragraph 245 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 245 and so deny them.

246. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. The referenced sources speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 246 and so deny them.

247. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. The statements of public officials and statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 247 and so deny them.

248. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. Census bureau data and government reports speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without

knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 248 and so deny them.

249. Voter turnout data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 249 and so deny them.

250. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. The statute speaks for itself and does not require a response. Paragraph 250 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 250 and so deny them.

251. The Republican Committees admit that “the Texas Legislature need not wait for prevalent election fraud before drafting prophylactic laws.” The Republican Committees deny that SB 1 is unlawful or that Plaintiffs are entitled to relief. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. The statute speaks for itself and does not require a response. Paragraph 251 states legal conclusions and/or statements of what the

law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 251 and so deny them.

## **CLAIMS FOR RELIEF**

### **Count One**

250. The Republican Committees incorporate their responses to the preceding paragraphs.
251. The Republican Committees deny that SB 1 will “place an undue burden” on voting. The First and Fourteenth Amendments and the statute speak for themselves and do not require a response. Paragraph 251 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.
252. The Fourteenth Amendment speaks for itself and does not require a response.
253. The First Amendment speaks for itself and does not require a response. Paragraph 253 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.
254. Court decisions speak for themselves and do not require a response.
255. Court decisions speak for themselves and do not require a response.
256. Court decisions speak for themselves and do not require a response. Paragraph 256 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

257. Court decisions speak for themselves and do not require a response. Paragraph 257 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.
258. Court decisions speak for themselves and do not require a response. Paragraph 258 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.
259. The Republican Committees deny that SB 1 will “erect substantial burdens and barriers on Texas voters.” Paragraph 259 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.
260. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees deny that SB 1 unlawfully infringes on the right to vote.
261. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees deny that SB 1 unlawfully infringes on the right to vote.
262. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees deny that SB 1 unlawfully infringes on the right to vote.
263. The Republican Committees deny that SB 1 “will make voting harder” or “unnecessarily burden access to absentee ballots” for eligible voters. Paragraph 263 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees

are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 263 and so deny them.

264. The Republican Committees deny the justification for SB 1 was “pretextual.” Court decisions speak for themselves and do not require a response. Paragraph 264 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 264 and so deny them.

265. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. Paragraph 265 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 265 and so deny them.

266. Paragraph 266 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 266 and so deny them.



267. Paragraph 267 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

268. Paragraph 268 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 268 and so deny them.

269. Paragraph 269 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 269 and so deny them.

### **Count Two**

270. The Republican Committees incorporate their responses to the preceding paragraphs.

271. Section 1983 speaks for itself and does not require a response. Paragraph 271 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

272. The Fourteenth Amendment speaks for itself and does not require a response.

273. Court decisions speak for themselves and do not require a response. Paragraph 273 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

274. Court decisions speak for themselves and do not require a response. Paragraph 274 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.
275. The Republican Committees deny that SB 1 will “deny, abridge, or suppress the right to vote . . . on account of race or color.” Paragraph 275 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.
276. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees deny that SB 1 unlawfully infringes on the right to vote.
277. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees deny that SB 1 unlawfully infringes on the right to vote.
278. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees deny that SB 1 unlawfully infringes on the right to vote.
279. The Republican Committees deny the allegations in Paragraph 279.
280. Paragraph 280 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 280 and so deny them.

281. Paragraph 281 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 281 and so deny them.

282. Paragraph 282 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 282 and so deny them.

283. Paragraph 283 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 283 and so deny them.

284. The Republican Committees deny the justification for SB 1 was “pretextual.” Paragraph 284 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

285. Legislative history speaks for itself and does not require a response. The allegations in Paragraph 285 are legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these

allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief as to the remaining allegations in Paragraph 285 and so deny them.

286. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. Paragraph 286 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 286 and so deny them.

287. The Republican Committees deny that SB 1 “abridge[es]” anyone’s right to vote. Paragraph 287 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 287 and so deny them.

288. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history, but deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. Paragraph 288 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or

information sufficient to form a belief about the truth of the remaining allegations in Paragraph 288 and so deny them.

289. Paragraph 289 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 289 and so deny them.

### **Count Three**

290. The Republican Committees incorporate their responses to the preceding paragraphs.

291. The Fifteenth Amendment speaks for itself and does not require a response. Paragraph 291 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

292. The Fifteenth Amendment speaks for itself and does not require a response.

293. The Fifteenth Amendment and court decisions speak for themselves and do not require a response. Paragraph 293 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

294. The Republican Committees deny that SB 1 “violate[s] the Fifteenth Amendment.” Paragraph 294 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

295. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees deny that SB 1 unlawfully infringes on the right to vote.
296. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees deny that SB 1 unlawfully infringes on the right to vote.
297. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees deny that SB 1 unlawfully infringes on the right to vote.
298. The Republican Committees deny that SB 1 was enacted “to intentionally deny, abridge, or suppress the right to vote.” Paragraph 298 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 298 and so deny them.
299. Paragraph 299 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 299 and so deny them.
300. Paragraph 300 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information

sufficient to form a belief about the truth of the remaining allegations in Paragraph 300 and so deny them.

#### **Count Four**

301. The Republican Committees incorporate their responses to the preceding paragraphs.
302. Section 2 of the Voting Rights Act speaks for itself and does not require a response.
303. Court decisions speak for themselves and do not require a response. Paragraph 303 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.
304. Court decisions speak for themselves and do not require a response. Paragraph 304 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.
305. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history, but deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. Paragraph 305 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 305 and so deny them.
306. Court decisions speak for themselves and do not require a response. Paragraph 306 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 306 and so deny them.

307. Paragraph 307 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 307 and so deny them.

308. Paragraph 308 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 308 and so deny them.

309. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees deny that SB 1 unlawfully infringes on the right to vote.

310. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees deny that SB 1 unlawfully infringes on the right to vote.

311. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees deny that SB 1 unlawfully infringes on the right to vote.

312. Paragraph 312 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information



sufficient to form a belief about the truth of the remaining allegations in Paragraph 312 and so deny them.

313. The Republican Committees deny that SB 1 “specifically target[s] voting methods that Latino, Black and other voters of color” use or have used. Paragraph 313 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 313 and so deny them.

314. Paragraph 314 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 314 and so deny them.

315. The Republican Committees deny that SB 1 was “pretextual.” The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. Court decisions speak for themselves and do not require a response. Paragraph 315 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 315 and so deny them.

316. The Republican Committees deny that SB 1 denies or abridges the right to vote. Paragraph 316 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

317. Paragraph 317 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 317 and so deny them.

#### **Count Five**

318. The Republican Committees incorporate their responses to the preceding paragraphs.

319. The Voting Rights Act speaks for itself and does not require a response. Paragraph 319 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

320. The Voting Rights Act speaks for itself and does not require a response. Paragraph 320 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

321. The Voting Rights Act and court decisions speak for themselves and do not require a response. Paragraph 321 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

322. The statutes speak for themselves and do not require a response. Paragraph 322 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.
323. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees deny that SB 1 unlawfully infringes on the right to vote.
324. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees deny that SB 1 unlawfully infringes on the right to vote.
325. The Republican Committees deny that SB 1 unlawfully infringes on the right to vote. The statutes speak for themselves and do not require a response. Paragraph 325 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.
326. Paragraph 326 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 326 and so deny them.

### **Count Six**

327. The Republican Committees incorporate their responses to the preceding paragraphs.
328. The Fourteenth Amendment to the U.S. Constitution and court decisions speak for themselves and do not require a response. Paragraph 328 states legal conclusions and/or

statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

329. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees deny that SB 1 unlawfully infringes on the right to vote or is “unconstitutionally vague.”

330. The statutes speak for themselves and do not require a response. Paragraph 330 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

331. The statutes speak for themselves and do not require a response. Paragraph 331 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

332. The statutes speak for themselves and do not require a response. Paragraph 332 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

333. The statutes speak for themselves and do not require a response. Paragraph 333 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. Court decisions speak for themselves and do not require a response.

334. Paragraph 334 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 334 and so deny them.

335. Paragraph 335 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 335 and so deny them.

336. Court decisions speak for themselves and do not require a response. Paragraph 336 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 336 and so deny them.

**Count Seven**

337. The Republican Committees incorporate their responses to the preceding paragraphs.

338. The Republican Committees admit that “[v]oting is a fundamental right.” The government report speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 338 and so deny them.

339. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees deny that SB 1 unlawfully “discriminate[s] against voters with disabilities.”

340. The Americans with Disabilities Act (ADA) and court decisions speak for themselves and do not require a response. Paragraph 340 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

341. The ADA and court decisions speak for themselves and do not require a response.

Paragraph 341 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

342. The ADA and regulations speak for themselves and do not require a response. Paragraph

342 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

343. The ADA speaks for itself and does not require a response. Paragraph 343 states legal

conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

344. Paragraph 344 states legal conclusions and/or statements of what the law provides or

should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 344 and so deny them.

345. Paragraph 345 states legal conclusions and/or statements of what the law provides or

should provide, to which no response is required. To the extent a response is required, these allegations are denied.

346. The ADA and regulations speak for themselves and do not require a response. Paragraph

346 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

347. The ADA speaks for itself and does not require a response. Paragraph 347 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.
348. The ADA speaks for itself and does not require a response. Paragraph 348 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.
349. The Republican Committees deny that SB 1 “discriminate[s] against people with disabilities in exercising their right to vote.” The statutes speak for themselves and do not require a response. Paragraph 349 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.
350. Paragraph 350 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 350 and so deny them.
351. The Republican Committees deny the allegations in Paragraph 351.
352. The Republican Committees deny that SB 1 “discriminate[s] against qualified Texas voters with disabilities.” The statutes speak for themselves and do not require a response. Paragraph 352 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

353. Paragraph 353 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 353 and so deny them.

### **Count Eight**

354. The Republican Committees incorporate their responses to the preceding paragraphs.

355. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees deny that SB 1 unlawfully “discriminate[s] against voters with disabilities.”

356. The Rehabilitation Act speaks for itself and does not require a response. Paragraph 356 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

357. The Rehabilitation Act speaks for itself and does not require a response. Paragraph 357 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

358. The Rehabilitation Act speaks for itself and does not require a response. Paragraph 358 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

359. The Rehabilitation Act speaks for itself and does not require a response. Paragraph 359 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.



360. The Rehabilitation Act and ADA speak for themselves and do not require a response.

Paragraph 360 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

361. Paragraph 361 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 361 and so deny them.

362. The Rehabilitation Act, the ADA, and court decisions speak for themselves and do not require a response. Paragraph 362 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

363. The Republican Committees incorporate their responses to the preceding paragraphs responding to Count Seven. The Republican Committees deny that SB 1 “discriminate[s] against people with disabilities in exercising their right to vote” or violates the Rehabilitation Act. Paragraph 363 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 363 and so deny them.

364. The Republican Committees deny that SB 1 “den[ies] qualified individuals with disabilities a full and equal opportunity to participate in the State’s voting programs.” The statutes speak

for themselves and do not require a response. Paragraph 364 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

365. Paragraph 365 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 365 and so deny them.

#### **PRAYER FOR RELIEF**

The Republican Committees deny that Plaintiffs are entitled to the relief requested.

#### **AFFIRMATIVE AND OTHER DEFENSES**

Without assuming the burden of proof, and while reserving the right to assert all applicable affirmative defenses supported in law and fact, the Republican Committees assert the following affirmative defenses:

##### **FIRST AFFIRMATIVE DEFENSE**

The Court lacks subject matter jurisdiction over Plaintiffs' claims.

##### **SECOND AFFIRMATIVE DEFENSE**

The Complaint fails to allege sufficient facts upon which a claim for relief may be granted.

##### **THIRD AFFIRMATIVE DEFENSE**

Plaintiffs lack standing to assert their claims in the Complaint.

##### **FOURTH AFFIRMATIVE DEFENSE**

Plaintiffs' claims are barred by the applicable statutes of limitations.

### **FIFTH AFFIRMATIVE DEFENSE**

Plaintiffs' claims are barred by the equitable doctrines of laches, estoppel, unclean hands, and/or waiver.

### **SIXTH AFFIRMATIVE DEFENSE**

Plaintiffs have failed to join indispensable parties to this action.

### **CONCLUSION**

The Republican Committees respectfully request that the Court (1) dismiss Plaintiffs' claims with prejudice and enter judgment for Defendants; (2) deny Plaintiffs' prayer for relief; and (3) grant other such relief as the Court may deem proper.

May 11, 2022

Respectfully submitted,

/s/ John M. Gore

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*\*Pro hac vice applications forthcoming*

*\*\*Application for admission to the Western*

*District of Texas pending*

*Admitted in Pennsylvania*

*Not admitted in D.C. (directly supervised by  
John M. Gore, a licensed D.C. Bar member)*

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

OCA-Greater Houston, *et al.*,

*Plaintiffs,*

v.

Jose Esparza, *et al.*,

*Defendants.*

No. 1:21-cv-00780-XR

Consolidated with *La Unión del Pueblo  
Entero v. Abbott*, No. 5:21-cv-844

**HARRIS COUNTY REPUBLICAN PARTY, DALLAS COUNTY REPUBLICAN PARTY,  
REPUBLICAN NATIONAL COMMITTEE, NATIONAL REPUBLICAN SENATORIAL  
COMMITTEE, AND NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE’S  
[PROPOSED] ANSWER TO SECOND AMENDED COMPLAINT**

Intervenor-Defendants Harris County Republican Party, Dallas County Republican Party, Republican National Committee, National Republican Senatorial Committee, and National Republican Congressional Committee (the “Republican Committees”) respectfully answer Plaintiffs’ Complaint. Any allegation in the Complaint not explicitly responded to in this Answer is hereby denied.

**INTRODUCTION**

1. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees deny that SB 1 unlawfully infringes on the right to vote. The Republican Committees deny that SB 1 is “illegal” or “aims to make it harder for Texans to vote.” Voter turnout data and the statements of public officials speak for themselves and do not require a response. Paragraph 1 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican

Committees are without knowledge or information sufficient to form a belief as to the remaining allegations in Paragraph 1 and so deny them.

2. Legislative history speaks for itself and does not require a response. Paragraph 2 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief as to the remaining allegations in Paragraph 2 and so deny them.

3. The Republican Committees deny that SB 1 “make[s] it more burdensome and potentially impossible for many Texas voters and community organizations to participate in the democratic process.” The Republican Committees deny the remaining allegations in Paragraph 3.

4. The Republican Committees deny that SB 1 “takes particular aim” at any voters or organizations. The statute speaks for itself and does not require a response. Paragraph 4 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

5. The statute speaks for itself and does not require a response. Paragraph 5 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

6. The Republican Committees deny that SB 1 “target[s]” any voters or community organizations. Court decisions speak for themselves and do not require a response. Paragraph 6 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees deny that Plaintiffs are entitled to relief.

## **JURISDICTION AND VENUE**

7. Paragraph 7 states legal conclusions that do not require a response. To the extent a response is required, these allegations are denied.

8. Paragraph 8 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, the Republican Committees do not contest venue; and, except as expressly admitted, the Republican Committees deny any remaining allegations in Paragraph 8.

## **PARTIES**

9. Paragraph 9 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 9 and so deny them.

10. Paragraph 10 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 10 and so deny them.

11. Paragraph 11 legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 11 and so deny them.

12. Paragraph 12 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 12 and so deny them.

13. Paragraph 13 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 13 and so deny them.

14. Footnote 1 to Paragraph 14 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, the Republican Committees deny these allegations. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 14 and so deny them.

15. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 15 and so deny them.

16. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 16 and so deny them.

17. The Republican Committees deny SB 1 harms anyone. Paragraph 17 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican

Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 17 and so deny them.

18. The Republican Committees deny SB 1 harms anyone. Paragraph 18 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 18 and so deny them.

19. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 19 and so deny them.

20. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 20 and so deny them.

21. The Republican Committees deny SB 1 harms anyone. Paragraph 21 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 21 and so deny them.

22. The Republican Committees deny SB 1 harms anyone. Paragraph 22 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 22 and so deny them.

23. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 23 and so deny them.



24. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 24 and so deny them.

25. Paragraph 25 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 25 and so deny them.

26. Paragraph 26 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 26 and so deny them.

27. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 27 and so deny them.

28. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 28 and so deny them.

29. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 29 and so deny them.

30. The Republican Committees deny SB 1 harms anyone. Paragraph 30 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 30 and so deny them.

31. The Republican Committees deny SB 1 harms anyone. Paragraph 31 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 31 and so deny them.

32. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 32 and so deny them.

33. The Republican Committees deny SB 1 harms anyone. Paragraph 33 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 33 and so deny them.

34. The Republican Committees deny SB 1 harms anyone. Paragraph 34 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 34 and so deny them.

35. The Republican Committees admit that Defendant Scott is the Secretary of State of Texas and that Plaintiffs purport to sue him in his official capacity. The statutes speak for themselves and do not require a response. Paragraph 35 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

36. The statutes speak for themselves and do not require a response. Paragraph 36 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

37. The statutes speak for themselves and do not require a response. Paragraph 37 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

38. The statute speaks for itself and does not require a response. Paragraph 38 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

39. The statements of public officials and legislative history speak for themselves and do not require a response. Paragraph 39 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 39 and so deny them.

40. The Republican Committees admit that Defendant Paxton is the Attorney General of Texas and that Plaintiffs purport to sue him in his official capacity. The statutes and statements on an agency website speak for themselves and do not require a response. Paragraph 37 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

41. The statutes speak for themselves and do not require a response. Paragraph 41 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

42. The statutes and legislative history speak for themselves and do not require a response. Paragraph 42 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

43. The statutes and court decisions speak for themselves and do not require a response. Paragraph 43 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

44. Paragraph 44 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 44 and so deny them.

45. The statements of public officials and legislative history speak for themselves and do not require a response. Paragraph 45 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 45 and so deny them.

46. The statements of public officials speak for themselves and do not require a response. Paragraph 46 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information

sufficient to form a belief about the truth of the remaining allegations in Paragraph 46 and so deny them.

47. The statements of public officials speak for themselves and do not require a response. Paragraph 47 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 47 and so deny them.

48. The Republican Committees admit that Defendant Ogg is the Harris County District Attorney and that Plaintiffs purport to sue her in her official capacity. The lawsuit speaks for itself and does not require a response. Paragraph 48 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

49. The Republican Committees admit that Defendant Garza is the Travis County District Attorney and that Plaintiffs purport to sue him in his official capacity. The lawsuit speaks for itself and does not require a response. Paragraph 48 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

50. The Republican Committees admit that Defendant Longoria is the Harris County Elections Administrator and that Plaintiffs purport to sue her in her official capacity. The lawsuit speaks for itself and does not require a response.

51. The Republican Committees admit that Defendant DeBeauvoir is the Harris County Clerk and that Plaintiffs purport to sue her in her official capacity. The lawsuit speaks for itself and does not require a response.

52. Statutes and regulations speak for themselves and do not require a response. Paragraph 52 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

53. The statute and statements on a government website speak for themselves and do not require a response. Paragraph 53 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 53 and so deny them.

#### **FACTUAL BACKGROUND**

54. The Republican Committees deny that SB 1 makes it difficult for Texans to vote, that the Texas Legislature sought to “curtail Texans’ voting rights,” or that the Texas Legislature “did so in active defiance of well-established federal voting rights laws and principles.” Paragraph 54 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 54 and so deny them.

55. The Republican Committees deny that SB 1 will “illegally disenfranchise voters.” Paragraph 55 states legal conclusions and/or statements of what the law provides or should

provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 55 and so deny them.

56. Court decisions speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 56 and so deny them. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history. The Republican Committees deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination.

57. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history, but deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. Litigation documents speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 57 and so deny them.

58. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history, but deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. Court decisions and litigation documents speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 58 and so deny them.

59. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history, but deny that this history is relevant to SB 1 or that SB 1 was motivated

by racial discrimination. Court decisions speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 59 and so deny them.

60. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history, but deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. Court decisions and litigation documents speak for themselves and do not require a response. Paragraph 60 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 60 and so deny them.

61. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history, but deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. Court decisions speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 61 and so deny them.

62. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history, but deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. Court decisions, litigation documents, and legislative history speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 62 and so deny them.



63. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford v. Marion Cnty. Election Bd.*, 553 U.S. 181, 196 (2008). Court decisions speak for themselves and do not require a response. Paragraph 63 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 63 and so deny them.

64. Court decisions speak for themselves and do not require a response. Paragraph 64 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 64 and so deny them.

65. Court decisions speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 65 and so deny them.

66. The referenced sources speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 66 and so deny them.

67. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 67 and so deny them.

68. Litigation documents speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 68 and so deny them.

69. The Republican Committees deny that Texas has “restrictive” voting laws or that voting in Texas is “difficult.” Paragraph 69 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

70. The referenced sources speak for themselves and do not require a response. Paragraph 70 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 70 and so deny them.

71. 235. Statements made in in media articles speak for themselves and do not require a response. Paragraph 71 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 71 and so deny them.

72. Statements made in in media articles speak for themselves and do not require a response. Paragraph 72 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these

allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 72 and so deny them.

73. The referenced sources speak for themselves and do not require a response. Paragraph 73 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 73 and so deny them.

74. Court decisions speak for themselves and do not require a response. Paragraph 74 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 74 and so deny them.

75. The Republican Committees deny that that Texas “attempts to make voting as difficult as possible.” The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 75 and so deny them.

76. Census Bureau data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 76 and so deny them.

77. The referenced sources speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 77 and so deny them.

78. Court decisions, Census Bureau data, and statements made in media articles speak for themselves and do not require a response. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 78 and so deny them.

79. Census Bureau data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 79 and so deny them.

80. Census Bureau data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 80 and so deny them.

81. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 81 and so deny them.

82. Paragraph 82 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 82 and so deny them.

83. Legislative history speaks for itself and does not require a response. Paragraph 83 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 83 and so deny them.

84. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 84 and so deny them.

85. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 85 and so deny them.

86. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 86 and so deny them.

87. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 87 and so deny them.

88. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 88 and so deny them.

89. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 89 and so deny them.

90. Legislative history and statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 90 and so deny them.

91. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 91 and so deny them.

92. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 92 and so deny them.

93. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 93 and so deny them.

94. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 94 and so deny them.

95. The statute speaks for itself and does not require a response. Paragraph 95 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

96. The Republican Committees deny that SB 1 violates any federal law. The statute speaks for itself and does not require a response. Paragraph 96 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

97. The statutes speak for themselves and do not require a response. Paragraph 97 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

98. Texas law speaks for itself and does not require a response. Paragraph 98 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

99. The statute speaks for itself and does not require a response. Paragraph 99 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

100. The statute speaks for itself and does not require a response. Paragraph 100 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

101. The statute speaks for itself and does not require a response. Paragraph 101 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

102. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 102 and so deny them.

103. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 103 and so deny them.

104. The statute speaks for itself and does not require a response. Paragraph 104 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

105. The statute speaks for itself and does not require a response. Paragraph 105 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

106. The statute speaks for itself and does not require a response. Paragraph 106 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

107. The statute speaks for itself and does not require a response. Paragraph 107 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

108. The statute speaks for itself and does not require a response. Paragraph 108 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

109. The statutes speak for themselves and do not require a response. Paragraph 109 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

110. The statute speaks for itself and does not require a response. Paragraph 110 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

111. The statute speaks for itself and does not require a response. Paragraph 111 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

112. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 112 and so deny them.

113. Paragraph 113 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information



sufficient to form a belief about the truth of the remaining allegations in Paragraph 113 and so deny them.

114. Paragraph 114 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 114 and so deny them.

115. The statutes speak for themselves and do not require a response. Paragraph 115 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 115 and so deny them.

116. Paragraph 116 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 116 and so deny them.

117. Paragraph 117 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 117 and so deny them.

118. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 118 and so deny them.

119. Paragraph 119 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 119 and so deny them.

120. Paragraph 120 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 120 and so deny them.

121. Paragraph 121 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 121 and so deny them.

122. Paragraph 122 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 122 and so deny them.

123. Paragraph 123 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 123 and so deny them.

#### **COUNT 1**

124. Section 101 of the Civil Rights Act speaks for itself and does not require a response.

125. The Republican Committees deny that any of the challenged provisions of SB 1 “violates” any provision of the Civil Rights Act. Paragraph 125 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

126. Paragraph 126 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

127. The Republican Committees deny that any of the challenged provisions of SB 1 is “preempted by federal law.” Paragraph 127 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

128. The Republican Committees deny that Plaintiffs are entitled to relief. Court decisions speak for themselves and do not require a response. Paragraph 128 and Footnote 12 state legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

**COUNT 2**

129. Title II of the Americans with Disabilities Act (ADA) and its implementing regulations speak for themselves and do not require a response. Paragraph 129 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

130. Title II of the ADA and its implementing regulations speak for themselves and do not require a response. Paragraph 130 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

131. Title II of the ADA, its implementing regulations, and SB 1 speak for themselves and do not require a response. Paragraph 131 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

132. The Republican Committees deny that SB 1 interferes with any person's rights under Title II of the ADA. Title II of the ADA, its implementing regulations, and SB 1 speak for themselves and do not require a response. Paragraph 132 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

133. The Republican Committees deny that SB 1 prevents voters with disabilities from fully and equally enjoying access to voting. Title II of the ADA, its implementing regulations, and SB 1 speak for themselves and do not require a response. Paragraph 133 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

134. The Republican Committees deny that SB 1 subjects voters with disabilities to discrimination. Title II of the ADA, its implementing regulations, and SB 1 speak for themselves and do not require a response. Paragraph 134 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

135. The Republican Committees deny that any of the challenged provisions of SB 1 “discriminate[s]” against any voter. Paragraph 135 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

136. The Republican Committees deny the allegations in Paragraph 136.

137. The statute speaks for itself and does not require a response. Paragraph 137 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

138. The Republican Committees deny the allegations in Paragraph 138.

139. The Republican Committees deny that Plaintiffs are entitled to relief. Paragraph 139 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

### **COUNT 3**

140. Section 504 of the Rehabilitation Act of 1973 speaks for itself and does not require a response.

141. Section 504 of the Rehabilitation Act of 1973 speaks for itself and does not require a response.

142. Section 504 of the Rehabilitation Act of 1973 and its implementing regulations speak for themselves and do not require a response.

143. The Republican Committees deny that SB 1 “subject[s]” any individual or voter “to discrimination.” Paragraph 143 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

144. The Republican Committees deny the allegations in Paragraph 144.

145. The Republican Committees deny the allegations in Paragraph 145.

146. The Republican Committees deny the allegations in Paragraph 146.

147. The Republican Committees deny that Plaintiffs are entitled to relief.

148. The Republican Committees deny the allegations in Paragraph 148.

149. The statute speaks for itself and does not require a response.

150. The statute speaks for itself and does not require a response. Paragraph 150 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

151. The statute speaks for itself and does not require a response. Paragraph 151 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

152. The Republican Committees deny that the new oath provisions are unlawful. Texas law speaks for itself and does not require a response. Paragraph 152 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are

without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 152 and so deny them.

153. The statute and regulations speak for themselves and do not require a response. Paragraph 153 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

154. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 154 and so deny them.

155. Paragraph 155 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 155 and so deny them.

156. Paragraph 156 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 156 and so deny them.

157. Paragraph 157 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 157 and so deny them.

158. Paragraph 158 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 158 and so deny them.

159. Court decisions speak for themselves and do not require a response. Paragraph 159 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 159 and so deny them.

160. Paragraph 160 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 160 and so deny them.

161. Paragraph 161 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 161 and so deny them.

162. The statute speaks for itself and does not require a response. Paragraph 162 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.



163. The statute speaks for itself and does not require a response. Paragraph 163 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

164. The statutes speak for themselves and do not require a response. Paragraph 164 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 164 and so deny them.

165. The Republican Committees deny the allegations in Paragraph 165.

166. Court decisions speak for themselves and do not require a response. Paragraph 166 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 166 and so deny them.

167. Paragraph 167 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 167 and so deny them.

168. Paragraph 168 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information

sufficient to form a belief about the truth of the remaining allegations in Paragraph 168 and so deny them.

169. Paragraph 169 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 169 and so deny them.

170. Paragraph 170 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 170 and so deny them.

171. Paragraph 171 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 171 and so deny them.

172. Paragraph 172 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 172 and so deny them.

173. Paragraph 173 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 173 and so deny them.

174. Paragraph 174 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 174 and so deny them.

175. Paragraph 175 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 175 and so deny them.

#### **COUNT 4**

176. Section 208 of the Voting Rights Act speaks for itself and does not require a response.

177. Section 208 of the Voting Rights Act speaks for itself and does not require a response. Paragraph 177 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

178. The Republican Committees deny that SB 1 violates Section 208. SB 1 and court decisions speak for themselves and do not require a response. Paragraph 178 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

179. Statutes and court decisions speak for themselves and do not require a response. Paragraph 179 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

180. Court decisions speak for themselves and do not require a response. Paragraph 180 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

181. The Republican Committees deny that Plaintiffs are entitled to relief. Paragraph 181 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

## **COUNT 5**

182. The Republican Committees incorporate their responses to the allegations referenced in Paragraph 182.

183. The Republican Committees deny the allegations in Paragraph 183.

184. The Republican Committees deny that SB 1 interferes with, intimidates, or threatens voters' rights or subjects any voter to discrimination. Title II of the ADA, its implementing regulations, and SB 1 speak for themselves and do not require a response. Paragraph 184 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

185. Paragraph 185 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

186. The Republican Committees deny the allegations in Paragraph 186.

187. The Republican Committees deny that Plaintiffs are entitled to relief. Paragraph 187 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

### **COUNT 6**

188. The Republican Committees incorporate their responses to the allegations referenced in Paragraph 188.

189. The Republican Committees deny the allegations in Paragraph 189.

190. The Republican Committees deny the allegations in Paragraph 190.

191. Paragraph 191 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

192. The Republican Committees deny the allegations in Paragraph 192.

193. The Republican Committees deny the allegations in Paragraph 193.

194. The Republican Committees deny that Plaintiffs are entitled to relief.

195. The statute speaks for itself and does not require a response. Paragraph 195 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

196. The Republican Committees deny that SB 1 is unconstitutional. The statute speaks for itself and does not require a response. Paragraph 196 states legal conclusions and/or statements

of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

197. The Republican Committees deny that SB 1 is unconstitutional. The statute speaks for itself and does not require a response. Paragraph 197 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

198. The statute speaks for itself and does not require a response. Paragraph 198 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

199. The statute speaks for itself and does not require a response. Paragraph 199 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

200. The statute speaks for itself and does not require a response. Paragraph 200 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

201. The statute speaks for itself and does not require a response. Paragraph 201 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

202. The statute speaks for itself and does not require a response. Paragraph 202 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

203. Texas law speaks for itself and does not require a response. Paragraph 203 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

204. The statute speaks for itself and does not require a response. Paragraph 204 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

205. Texas law speaks for itself and does not require a response. Paragraph 205 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

206. The statute speaks for itself and does not require a response. Paragraph 206 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

207. The statute speaks for itself and does not require a response. Paragraph 207 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

208. Paragraph 208 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 208 and so deny them.

209. Paragraph 209 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information

sufficient to form a belief about the truth of the remaining allegations in Paragraph 209 and so deny them.

210. Paragraph 210 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 210 and so deny them.

211. Paragraph 211 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 211 and so deny them.

212. Paragraph 212 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 212 and so deny them.

213. Paragraph 213 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 213 and so deny them.



**COUNT 7**

214. The First Amendment and court decisions speak for themselves and do not require a response. Paragraph 214 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

215. Paragraph 215 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

216. The Republican Committees deny the allegations in Paragraph 216.

217. Paragraph 217 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 217 and so deny them.

218. The Republican Committees deny that the challenged provision of SB 1 is “unconstitutionally overbroad.” Paragraph 218 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

219. Paragraph 219 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

220. Court decisions speak for themselves and do not require a response. Paragraph 220 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

221. The Republican Committees deny that SB 1 is unconstitutional. Paragraph 221 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

222. The Republican Committees deny that SB 1 is unconstitutional. Paragraph 222 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

223. The Republican Committees deny that SB 1 is unconstitutional. Paragraph 223 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 223 and so deny them.

224. The Republican Committees deny the allegations in Paragraph 224.

225. The Republican Committees deny that Plaintiffs are entitled to relief. Paragraph 225 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

#### **COUNT 8**

226. The Constitution and court decisions speak for themselves and do not require a response. Paragraph 226 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

227. Paragraph 227 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

228. The Republican Committees deny the allegations in Paragraph 228.

229. Paragraph 229 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

230. Paragraph 230 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

231. Paragraph 231 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

232. Paragraph 232 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

233. Paragraph 233 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

234. Paragraph 234 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

235. Paragraph 235 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

236. Paragraph 236 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

237. Paragraph 237 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

238. The Republican Committees deny the allegations in Paragraph 238.

239. The Republican Committees deny that Plaintiffs are entitled to relief. Paragraph 239 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

#### **PRAYER FOR RELIEF**

The Republican Committees deny that Plaintiffs are entitled to the relief requested.

#### **AFFIRMATIVE AND OTHER DEFENSES**

Without assuming the burden of proof, and while reserving the right to assert all applicable affirmative defenses supported in law and fact, the Republican Committees assert the following affirmative defenses:

##### **FIRST AFFIRMATIVE DEFENSE**

The Court lacks subject matter jurisdiction over Plaintiffs' claims.

##### **SECOND AFFIRMATIVE DEFENSE**

The Complaint fails to allege sufficient facts upon which a claim for relief may be granted.

### **THIRD AFFIRMATIVE DEFENSE**

Plaintiffs lack standing to assert their claims in the Complaint.

### **FOURTH AFFIRMATIVE DEFENSE**

Plaintiffs' claims are barred by the applicable statutes of limitations.

### **FIFTH AFFIRMATIVE DEFENSE**

Plaintiffs' claims are barred by the equitable doctrines of laches, estoppel, unclean hands, and/or waiver.

### **SIXTH AFFIRMATIVE DEFENSE**

Plaintiffs have failed to join indispensable parties to this action.

### **CONCLUSION**

The Republican Committees respectfully request that the Court (1) dismiss Plaintiffs' claims with prejudice and enter judgment for Defendants; (2) deny Plaintiffs' prayer for relief; and (3) grant other such relief as the Court may deem proper.

May 11, 2022

Respectfully submitted,

/s/ John M. Gore

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*Counsel for Proposed Intervenor-Defendants*

\**Pro hac vice* applications forthcoming

\*\*Application for admission to the Western

District of Texas pending

Admitted in Pennsylvania

Not admitted in D.C. (directly supervised by

John M. Gore, a licensed D.C. Bar member)

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
SAN ANTONIO DIVISION**

La Unión Del Pueblo Entero, *et al.*,

*Plaintiffs,*

v.

No. 5:21-cv-00844-XR

Gregory W. Abbott, *et al.*,

*Defendants.*

**HARRIS COUNTY REPUBLICAN PARTY, DALLAS COUNTY REPUBLICAN PARTY,  
REPUBLICAN NATIONAL COMMITTEE, NATIONAL REPUBLICAN SENATORIAL  
COMMITTEE, AND NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE’S  
[PROPOSED] ANSWER TO UNITED STATES’ AMENDED COMPLAINT**

Intervenor-Defendants Harris County Republican Party, Dallas County Republican Party, Republican National Committee, National Republican Senatorial Committee, and National Republican Congressional Committee (the “Republican Committees”) respectfully answer the United States’ Amended Complaint. Any allegation in the Complaint not explicitly responded to in this Answer is hereby denied.

**INTRODUCTION**

1. The Republican Committees admit that the Texas Legislature enacted SB 1. The Republican Committees deny that SB 1 “restricts eligible voters’ ability to cast a ballot and have that ballot counted.” The statute speaks for itself and does not require a response. Paragraph 1 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

2. The Republican Committees admit that Plaintiff purports to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees deny

that SB 1 unlawfully infringes on the right to vote. The statutes speak for themselves and do not require a response. Paragraph 2 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

3. The Republican Committees deny that SB 1 “will disenfranchise eligible Texas citizens.” Paragraph 3 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 3 and so deny them.

4. The Republican Committees deny that SB 1 “impermissibly” “restricts” “meaningful assistance in the voting booth” or “curtail[s] fundamental voting rights.” Paragraph 4 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 4 and so deny them.

5. The Republican Committees deny that SB 1 “will disenfranchise” eligible voters. Paragraph 5 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 5 and so deny them.

6. The statutes and United States Constitution speak for themselves and do not require a response. Paragraph 6 states legal conclusions and/or statements of what the law provides or



should provide, to which no response is required. To the extent a response is required, these allegations are denied.

7. The Voting Rights Act speaks for itself and does not require a response. Paragraph 7 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

8. The Civil Rights Act of 1964 speaks for itself and does not require a response. Paragraph 8 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

#### **JURISDICTION AND VENUE**

9. Paragraph 9 states legal conclusions that do not require a response. To the extent a response is required, the Republican Committees deny these allegations.

10. Paragraph 10 states a legal conclusion that does not require a response. To the extent a response is required, the Republican Committees do not contest venue; and, except as expressly admitted, the Republican Committees deny any remaining allegations in Paragraph 10.

#### **PARTIES**

11. Paragraph 11 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

12. The Republican Committees admit that the State of Texas is one of the States of the United States of America.

13. The Republican Committees admit that Defendant Scott is the Secretary of State of Texas and that Plaintiff purports to sue him in his official capacity. Paragraph 13 states legal conclusions and/or statements of what the law provides or should provide, to which no response

is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 13 and so deny them.

### **ALLEGATIONS**

14. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history. The Republican Committees deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. Court decisions speak for themselves and do not require a response. Paragraph 14 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

15. Court decisions speak for themselves and do not require a response. Paragraph 15 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 15 and so deny them.

16. Census Bureau data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 16 and so deny them.

17. Census Bureau data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 17 and so deny them.

18. The referenced survey speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 18 and so deny them.

19. Census Bureau data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 19 and so deny them.

20. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 20 and so deny them.

21. The referenced survey speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 21 and so deny them.

22. The Voting Rights Act speaks for itself and does not require a response. Paragraph 22 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 22 and so deny them.

23. The referenced survey speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 23 and so deny them.

24. The referenced survey data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 24 and so deny them.

25. The statements of public officials speak for themselves and do not require a response. Paragraph 25 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 25 and so deny them.

26. Voter turnout data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 26 and so deny them.

27. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 27 and so deny them.

28. Voter turnout data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 28 and so deny them.

29. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the

legitimacy or importance of the State's interest" in combatting it. *Crawford*, 553 U.S. at 196. The statements of public officials speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 29 and so deny them.

30. Legislative history speaks for itself and does not require a response. Paragraph 30 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 30 and so deny them.

31. The statements of public officials speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 31 and so deny them.

32. The statements of public officials and the statutes speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 32 and so deny them.

33. Legislative history speaks for itself and does not require a response. Paragraph 33 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 33 and so deny them.

34. The Republican Committees admit that Governor Abbott signed SB 1 into law on September 7, 2021.

35. Paragraph 35 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

36. The statutes speak for themselves and do not require a response. Paragraph 36 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

37. The statute speaks for itself and does not require a response. Paragraph 37 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

38. The statute speaks for itself and does not require a response. Paragraph 38 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

39. The referenced sources speak for themselves and do not require a response. Paragraph 39 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 39 and so deny them.

40. The referenced sources speak for themselves and do not require a response. Paragraph 40 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations

are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 40 and so deny them.

41. The statute speaks for itself and does not require a response. Paragraph 41 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

42. The statute speaks for itself and does not require a response. Paragraph 42 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

43. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 43 and so deny them.

44. The Republican Committees deny that SB 1 “constrains assistance” with voting. The statute speaks for itself and does not require a response. Paragraph 44 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

45. Legislative history and the statute speak for themselves and do not require a response. Paragraph 45 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 45 and so deny them.

46. The statute speaks for itself and does not require a response. Paragraph 46 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

47. The statutes speak for themselves and do not require a response. Paragraph 47 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

48. The statute speaks for itself and does not require a response. Paragraph 48 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

49. The statute speaks for itself and does not require a response. Paragraph 49 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

50. The statute speaks for itself and does not require a response. Paragraph 50 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

51. The statute and referenced application speak for themselves and do not require a response. Paragraph 51 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 51 and so deny them.

52. The referenced sources speak for themselves and do not require a response. Paragraph 52 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.



53. The referenced sources speak for themselves and do not require a response. Paragraph 53 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

54. The statutes speak for themselves and do not require a response. Paragraph 54 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

55. The statute speaks for itself and does not require a response. Paragraph 55 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

56. The statute speaks for itself and does not require a response. Paragraph 56 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

57. The statutes speak for themselves and do not require a response. Paragraph 57 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

58. The statute speaks for itself and does not require a response. Paragraph 58 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

59. The statutes speak for themselves and do not require a response. Paragraph 59 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

60. The statute speaks for itself and does not require a response. Paragraph 60 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

61. The statute speaks for itself and does not require a response. Paragraph 61 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

62. The statutes speak for themselves and do not require a response. Paragraph 62 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

63. The Republican Committees deny that SB 1 “will disenfranchise eligible voters.” The statute speaks for itself and does not require a response. Paragraph 63 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 63 and so deny them.

64. The statute speaks for itself and does not require a response. Paragraph 64 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 64 and so deny them.

65. The statutes speak for themselves and do not require a response. Paragraph 65 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The

Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 65 and so deny them.

### **FIRST CAUSE OF ACTION**

66. The Republican Committees incorporate their responses to the preceding paragraphs.

67. The Voting Rights Act speaks for itself and does not require a response. Paragraph 67 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

68. The statute speaks for itself and does not require a response. Paragraph 68 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

69. The Republican Committees deny that SB 1 violates the Voting Rights Act. The statutes speak for themselves and do not require a response. Paragraph 69 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

70. The Republican Committees deny that SB 1 violates the Voting Rights Act and that Plaintiff is entitled to relief. The statutes speak for themselves and do not require a response. Paragraph 70 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 70 and so deny them.

## SECOND CAUSE OF ACTION

71. The Republican Committees incorporate their responses to the preceding paragraphs.

72. The Civil Rights Act of 1964 speaks for itself and does not require a response. Paragraph 72 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

73. The statutes speak for themselves and do not require a response. Paragraph 73 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

74. The statutes speak for themselves and do not require a response. Paragraph 74 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

75. The Republican Committees deny that SB 1 violates the Civil Rights Act of 1964. The statutes speak for themselves and do not require a response. Paragraph 75 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

76. The Republican Committees deny that SB 1 violates the Civil Rights Act of 1964 and that Plaintiff is entitled to relief. The statutes speak for themselves and do not require a response. Paragraph 76 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information

sufficient to form a belief about the truth of the remaining allegations in Paragraph 76 and so deny them.

### **PRAYER FOR RELIEF**

The Republican Committees deny that Plaintiff is entitled to the relief requested.

### **AFFIRMATIVE AND OTHER DEFENSES**

Without assuming the burden of proof, and while reserving the right to assert all applicable affirmative defenses supported in law and fact, the Republican Committees assert the following affirmative defenses:

#### **FIRST AFFIRMATIVE DEFENSE**

The Court lacks subject matter jurisdiction over Plaintiffs' claims.

#### **SECOND AFFIRMATIVE DEFENSE**

The Complaint fails to allege sufficient facts upon which a claim for relief may be granted.

#### **THIRD AFFIRMATIVE DEFENSE**

Plaintiffs lack standing to assert their claims in the Complaint.

#### **FOURTH AFFIRMATIVE DEFENSE**

Plaintiffs' claims are barred by the applicable statutes of limitations.

#### **FIFTH AFFIRMATIVE DEFENSE**

Plaintiffs' claims are barred by the equitable doctrines of laches, estoppel, unclean hands, and/or waiver.

#### **SIXTH AFFIRMATIVE DEFENSE**

Plaintiffs have failed to join indispensable parties to this action.

**CONCLUSION**

The Republican Committees respectfully request that the Court (1) dismiss Plaintiff's claims with prejudice and enter judgment for Defendants; (2) deny Plaintiff's prayer for relief; and (3) grant other such relief as the Court may deem proper.

May 11, 2022

Respectfully submitted,

/s/ John M. Gore

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*\*Pro hac vice applications forthcoming*

*\*\*Application for admission to the Western*

*District of Texas pending*

*Admitted in Pennsylvania*

*Not admitted in D.C. (directly supervised by*

*John M. Gore, a licensed D.C. Bar member)*