

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

LA UNIÓN DEL PUEBLO ENTERO, et al.,	§	
	§	
Plaintiffs	§	
	§	
v.	§	Consolidated Case
	§	No. 5:21-cv-00844-XR
THE STATE OF TEXAS, et al.,	§	
	§	
Defendants.	§	
	§	
	§	

**JOINT STIPULATION REGARDING THE DEPOSITION
OF THE EL PASO COUNTY ELECTIONS ADMINISTRATOR**

Pursuant to this Court’s standing instruction, *see* Fact Sheet for Judge Xavier Rodriguez ¶ 34, Plaintiffs La Unión del Pueblo Entero, *et. al.*¹ (“Private Plaintiffs”), Plaintiff the United States of America (“United States”), Intervenor-Defendants the Harris County Republican Party, Dallas County Republican Party, Republican National Committee, National Republican Senatorial Committee, and National Republican Congressional Committee (collectively, “Intervenor-Defendants”), State Defendants Gregory W. Abbott, W. Kenneth Paxton, and Jane Nelson (collectively, “State Defendants”), and Defendant El Paso County Elections Administrator Lisa Wise hereby stipulate that:

¹ Plaintiffs, with the exception of the United States, are as follows: La Unión del Pueblo Entero, Friendship-West Baptist Church, the Anti-Defamation League Austin, Southwest, and Texoma Regions, Southwest Voter Registration Education Project, Texas Impact, Mexican American Bar Association of Texas, Texas Hispanics Organized for Political Education, Jolt Action, William C. Velasquez Institute, FIEL Houston Inc., and James Lewin, Houston Justice, Houston Area Urban League, Delta Sigma Theta Sorority, Inc., The Arc of Texas, and Jeffrey Lamar Clemmons, LULAC Texas, Voto Latino, Texas Alliance for Retired Americans, Texas AFT, Mi Familia Vota, Marla Lopez, Marlon Lopez, Paul Rutledge, OCA-Greater Houston, League of Women Voters of Texas, REVUP-Texas, and Workers Defense Action Fund.

1. All undersigned parties agree that a deposition of the Office of the El Paso County Elections Administrator pursuant to Fed. R. Civ. P. 30(b)(6) (the “30(b)(6) Deposition”) will be held on April 18, 2023, starting at 10:00 a.m. CDT.

2. State Defendants have served the Office of the El Paso County Elections Administrator with notice as required under Fed. R. Civ. P. 30(b)(6).

3. The Office of the El Paso County Elections Administrator has designated El Paso County Elections Administrator Lisa Wise to testify at the 30(b)(6) Deposition.

4. State Defendants, Private Plaintiffs, the United States, and Intervenor-Defendants may ask questions of Ms. Wise at the 30(b)(6) Deposition. No other parties are noticing a deposition or will be permitted to ask questions of Ms. Wise at the 30(b)(6) Deposition.

5. State Defendants, Private Plaintiffs, the United States, and Intervenor-Defendants agree that any questions asked of Ms. Wise at the 30(b)(6) Deposition will fall solely within the scope of Exhibit A to that notice, subject to the limitation set forth in Paragraph 6 below. The Office of the El Paso County Elections Administrator further reserves the right to serve responses and objections to the topics set out in Exhibit A, and to meet and confer with counsel for State Defendants, Private Plaintiffs, the United States, and Intervenor-Defendants regarding the scope of questioning at the 30(b)(6) Deposition.

6. The undersigned parties agree that the 30(b)(6) Deposition of Ms. Wise will be exclusively dedicated to the November 2022 General Election.

7. All undersigned parties agree that they will not serve a deposition notice pursuant to Fed. R. Civ. P. 30(b)(1) on Ms. Wise.

8. All undersigned parties agree that the 30(b)(6) deposition will not extend beyond one day (*i.e.*, seven hours), to be split evenly among the State Defendants and the Intervenor-Defendants, on the one hand, and the Private Plaintiffs and the United States on the other.

9. By entering into this stipulation, the undersigned parties do not waive any rights to re-open the 30(b)(6) Deposition or to pursue a further deposition based on new or previously undisclosed information.

Dated: March 15, 2023

Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that on March 15, 2023, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification of this filing to counsel of record.

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