

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

LEAGUE OF UNITED LATIN AMERICAN CITIZENS, <i>et al.</i>	§ § § § § § § § § §	Case No. 3:21-cv-00259 [Lead Case]
<i>Plaintiffs,</i>	§	
V.	§	
GREG ABBOTT, <i>et al.</i> ,	§	
<i>Defendants.</i>	§	
TEXAS STATE CONFERENCE OF THE NAACP,	§ § § § § § § § § §	Case No. 1:21-cv-01006 [Consolidated Case]
<i>Plaintiff,</i>	§	
V.	§	
GREG ABBOTT, <i>et al.</i> ,	§	
<i>Defendants.</i>	§	

**PLAINTIFF TEXAS NAACP'S WITNESS LIST
FOR PRELIMINARY INJUNCTION HEARING**

Plaintiff Texas NAACP respectfully submits its Witness List for the upcoming hearing on Plaintiffs' motions for preliminary injunction. Texas NAACP reserves the right to call witnesses identified by Defendants or any other Plaintiff. Texas NAACP does not know the precise nature and scope of the testimony and evidence that Defendants may seek to introduce at the preliminary injunction hearing. Accordingly, Texas NAACP reserves the right to modify, amend, or supplement this witness list based on case developments, including without limitation the right

to: (1) call its witnesses in any order; (2) not call one or more witnesses; (3) call any witness identified on Defendants' witness list and any witness necessary to rebut Defendants' arguments and/or evidence, and/or to authenticate or lay the foundation for the introduction of documents to which Defendant objects; (4) reasonably supplement or amend this Witness List through and including the time of the preliminary injunction hearing to the extent permitted by the Court; or (5) introduce deposition testimony as impeachment evidence. Texas NAACP also reserves the right to supplement or modify this witness list in response to rulings made by the Court. Texas NAACP's identification of any witness listed herein is not an admission that the witness's testimony would be admissible if proffered by Defendants.

<u>Name</u>	<u>Will/May Call</u>	<u>[F]act/ [E]xpert/ [L]iability/ [D]amages</u>
Dr. Moon Duchin	Will	E/L
Tiffini Young	Will	F/L
Shemaiah Stokes	Will	F/L
Ramon Ramero	May	F/L
Barbara Gervin-Hawkins	May	F/L
Royce West	May	F/L
Carol Alvarado	May	F/L
Senfronia Thompson	May	F/L
Joe Moody	May	F/L

Dated: September 29, 2025

Respectfully submitted,

/s/ Lindsey B. Cohan

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related to Texas state senate and state house
plans

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CERTIFICATE OF SERVICE

I certify that a copy of the foregoing and all attachments were filed and served on counsel of record via the Court's electronic filing system on September 29, 2025.

/s/ Lindsey B. Cohan
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Counsel for Plaintiff Texas NAACP

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