

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

LEAGUE OF UNITED LATIN
AMERICAN CITIZENS, et al.,

Plaintiffs,

v.

GREG ABBOTT, et al.,

Defendants.

Civil Action

Lead Case No.:

3:21-CV-00259-DCG-JES-JVB

CECILIA GONZALES, et al.,

Plaintiffs,

v.

JANE NELSON, et al.,

Defendants.

Consolidated Case No.:

1:21-CV-00965-DCG-JES-JVB

GONZALES PLAINTIFFS' PRELIMINARY INJUNCTION HEARING DISCLOSURES

Plaintiffs in Case No. 1:21-cv-00965 (the "Gonzales Plaintiffs") by and through their undersigned counsel, hereby submit the following Preliminary Hearing Disclosures pursuant to the Court's Scheduling Order, ECF No. 1172. The Gonzales Plaintiffs reserve the right to amend and supplement these Disclosures, and to respond to Defendants' Disclosures, as appropriate.

I. WITNESSES¹

The Gonzales Plaintiffs expect to present the following witness at the preliminary injunction hearing:

¹ All witnesses may be contacted through counsel for the Gonzales Plaintiffs.

1. Stephen Ansolabehere, PhD, Frank G. Thompson Professor of Government at Harvard University

The Gonzales Plaintiffs may call the following witnesses at trial:

1. Cecilia Gonzales
2. Agustin Loreda
3. Jana Lynne Sanchez
4. Jerry Shafer
5. Debbie Lynn Solis
6. Charles Johnson Jr.
7. Vincent Sanders
8. Rogelio Nuñez
9. Marci Madla
10. Mercedes Salinas
11. Heidi Cruz
12. Sylvia Bruni
13. Gwendolyn Collins

Because these cases are consolidated for one hearing, the Gonzales Plaintiffs reserve the right to also rely on the testimony of witnesses called by other plaintiffs in these consolidated cases.

The Gonzales Plaintiffs do not know the precise nature and scope of the testimony and evidence that Defendants may seek to introduce at the preliminary injunction hearing. Accordingly, the Gonzales Plaintiffs reserve the right to modify, amend, or supplement this witness list leading up to and through the hearing based on case developments, including without limitation the right to: (1) call their witnesses in any order; (2) not call one or more witnesses; (3) call live or by deposition any witness identified on Defendants' witness list and any witness

necessary to rebut Defendants' case, 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 hearing to the extent permitted by the Court; (5) introduce deposition testimony as impeachment evidence; or (6) change a witness from a live witness to a witness testifying by deposition, and vice versa. The Gonzales Plaintiffs also reserve the right to supplement or modify this witness list in response to rulings made by the Court. The Gonzales Plaintiffs' identification of any witness listed herein is not an admission that the witness's testimony would be admissible if proffered by Defendants.

II. HEARING EXHIBITS

The Gonzales Plaintiffs' Preliminary Injunction Hearing Exhibit List is set forth below. The Gonzales Plaintiffs further reserve the right to introduce in evidence any documents identified by Defendants or any other consolidated plaintiff group in their Pre-Hearing Disclosures, to introduce additional documents as rebuttal or impeachment evidence, and to rely on the full record in support of their claims.

The Gonzales Plaintiffs' list of hearing exhibits does not include demonstrative exhibits, which will be identified and exchanged at a mutually agreeable time prior to the hearing. The Gonzales Plaintiffs will serve their objections to Defendants' hearing exhibit list and any additional hearing exhibits in accordance with the Court's Scheduling Order.

The Gonzales Plaintiffs expect to offer the following exhibits at the preliminary injunction hearing:

Exhibit Number	Description
Gonzales Plaintiffs' Exhibit 17	ECF No. 1149-2 (Document titled "Special Tabulation of Citizen Voting Age Population (CVAP) from the 2019-2023 American Community Survey" for Plan 2333, as marked as Joint Trial Exhibit 903)

Gonzales Plaintiffs' Exhibit 18	ECF No. 1149-3 (Document titled "Plan Overlap Population Analysis – Congressional Districts PLANC2193 Compared with PLANC2333 2024 General Election," from the Texas Legislative Council's website)
Gonzales Plaintiffs' Exhibit 19	ECF No. 1149-4 (Document titled "Special Tabulation of Citizen Voting Age Population (CVAP) from the 2019-2023 American Community Survey" for Plan 2193, from the Texas Legislative Council's website)
Gonzales Plaintiffs' Exhibit 20	ECF No. 1149-5 (SB 4's legislative history from the Texas Legislature's 89(1) session, from the website of Texas Legislature Online)
Gonzales Plaintiffs' Exhibit 21	ECF No. 1149-6 (Andrew Schneider and Blaise Gainey's article for KUT News as updated on August 20, 2025, titled "Texas Legislature's Second Special Session Begins as Quorum-Breaking Democrats Plan Return")
Gonzales Plaintiffs' Exhibit 22	ECF No. 1149-7 (Proclamation signed by Governor Abbott on August 15, 2025)
Gonzales Plaintiffs' Exhibit 23	ECF No. 1149-8 (SB 4's legislative history from the Texas Legislature's 89(2) session)
Gonzales Plaintiffs' Exhibit 24	ECF No. 1149-9 (HB 4's legislative history from the Texas Legislature's 89(2) session)
Gonzales Plaintiffs' Exhibit 25	ECF No. 1149-10 (Document titled "American Community Survey Estimated Population Analysis Congressional Districts - PLANC2333 2020 Census Population with 2019-2023 American Community Survey Estimates," from the Texas Legislative Council's website)
Gonzales Plaintiffs' Exhibit 26	ECF No. 1149-11 (Expert Report of Dr. Stephen Ansolabehere, May 20, 2022)
Gonzales Plaintiffs' Exhibit 27	ECF No. 1149-12 (Expert Report of Dr. Stephen Ansolabehere, March 31, 2025)
Gonzales Plaintiffs' Exhibit 28	ECF No. 1149-13 (Document titled "Special Tabulation of Citizen Voting Age Population (CVAP) from the 2015-2019 American Community Survey" for Plan 2193, as marked as Joint Trial Exhibit 899)
Gonzales Plaintiffs' Exhibit 29	ECF No. 1149-14 (Comparison packet titled "U.S. Congressional Districts Proposed Plan PLANC2333 with U.S. Congressional Districts 119th Congress (2025–2026) PLANC2193," from the Texas Legislative Council's website)
Gonzales Plaintiffs' Exhibit 30	ECF No. 1149-15 (Document titled "Incumbents by District" for Plan 2333, from the Texas Legislative Counsel's website)
Gonzales Plaintiffs' Exhibit 31	ECF No. 1149-16 (Document titled "Election Analysis Congressional Districts - PLANC2333 2024 General Election," from the Texas Legislative Council's website)

Gonzales Plaintiffs' Exhibit 32	ECF No. 1149-17 (Document titled "Election Analysis Congressional Districts - PLANC2193 2024 General Election," as marked as Joint Trial Exhibit 942)
Gonzales Plaintiffs' Exhibit 33	ECF No. 1149-18 (August 20, 2025 post on X by Speaker of the Texas House Dustin Burrows)
Gonzales Plaintiffs' Exhibit 34	ECF No. 1149-19 (Statement issued by Governor Abbott on August 20, 2025)
Gonzales Plaintiffs' Exhibit 35	ECF No. 1149-20 (Announcement by Governor Abbott on June 23, 2025)
Gonzales Plaintiffs' Exhibit 36	ECF No. 1149-21 (Document titled "Special Tabulation of Citizen Voting Age Population (CVAP) from the 2019-2023 American Community Survey" for Plan 2331, from the Texas Legislative Council's website)
Gonzales Plaintiffs' Exhibit 37	ECF No. 1149-22 (Comparison packet titled "U.S. Congressional Districts Proposed Plan PLANC2333 with U.S. Congressional Districts Proposed Plan PLANC2331," from the Texas Legislative Council's website)
Gonzales Plaintiffs' Exhibit 38	ECF No. 1149-23 (Document titled "Election Analysis Congressional Districts - PLANC2331 2024 General Election," from the Texas Legislative Council's website)
Gonzales Plaintiffs' Exhibit 39	ECF No. 1149-24 (Declaration and Expert Report of Dr. Stephen Ansolabehere, August 23, 2025)
Gonzales Plaintiffs' Exhibit 40	ECF No. 1149-25 (Declaration, Curriculum Vitae, and graphical representations of Blakeman B. Esselstyn, August 23, 2025)
Gonzales Plaintiffs' Exhibit 41	ECF No. 1114-2 (Harmeet Dhillon Letter to Governor Abbott, July 7, 2025)
Gonzales Plaintiffs' Exhibit 42	ECF No. 1116-1 (Ken Paxton's Response to Harmeet Dhillon Letter, July 11, 2025)
Gonzales Plaintiffs' Exhibit 43	ECF No. 1114-1 (Proclamation by Governor Abbott, July 9, 2025)
Gonzales Plaintiffs' Exhibit 44	FOX 4 Dallas-Fort Worth, "Abbott on THC, redistricting & the special session," (YouTube, July 22, 2025), https://www.youtube.com/watch?v=PHsYs0NTPTY
Gonzales Plaintiffs' Exhibit 45	Hr'g on H.B. 4 Before the H. Select Comm. on Cong. Redistricting, 89th Leg. (Tex. Aug. 1, 2025), https://house.texas.gov/videos/22418
Gonzales Plaintiffs' Exhibit 46	Hr'g on S.B. 4 Before the S. Spec. Comm. on Congressional Redistricting, 89th Leg. (Tex. Aug. 7, 2025), https://senate.texas.gov/videoplayer.php?vid=22443&lang=en
Gonzales Plaintiffs' Exhibit 47	CNN, "'What gives you the right?': Tapper pushes back on Abbott over calls to remove Dem lawmaker" at 4:00-4:17, YouTube (Aug. 11, 2025), https://tinyurl.com/yvf9ht6e

Gonzales Plaintiffs' Exhibit 48	Declaration of Cecilia Gonzales*
Gonzales Plaintiffs' Exhibit 49	Declaration of Agustin Loreda*
Gonzales Plaintiffs' Exhibit 50	Declaration of Jana Lynne Sanchez*
Gonzales Plaintiffs' Exhibit 51	Declaration of Jerry Shafer*
Gonzales Plaintiffs' Exhibit 52	Declaration of Debbie Lynn Solis*
Gonzales Plaintiffs' Exhibit 53	Declaration of Charles Johnson Jr.*
Gonzales Plaintiffs' Exhibit 54	Declaration of Vincent Sanders*
Gonzales Plaintiffs' Exhibit 55	Declaration of Rogelio Nuñez*
Gonzales Plaintiffs' Exhibit 56	Declaration of Marci Madla*
Gonzales Plaintiffs' Exhibit 57	Declaration of Mercedes Salinas*
Gonzales Plaintiffs' Exhibit 58	Declaration of Heidi Cruz*
Gonzales Plaintiffs' Exhibit 59	Declaration of Sylvia Bruni*
Gonzales Plaintiffs' Exhibit 60	Declaration of Gwendolyn Collins*
Gonzales Plaintiffs' Exhibit 61	Rebuttal Report of Dr. Stephen Ansolabehere, September 29, 2025
Gonzales Plaintiffs' Exhibit 62	Webpage titled "Percent Population Change for Texas Counties, 2020-2023," from the website of the Texas Demographic Center.

*Exhibit to be filed under seal. A redacted version will be filed on the public docket.

Dated: September 29, 2025

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Respectfully submitted,

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CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the foregoing document was filed electronically (via CM/ECF) on September 29, 2025, and that all counsel of record were served by CM/ECF.

/s/ David R. Fox

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