

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

LULAC, *et al.*,

Plaintiffs,

v.

GREG ABBOTT, in his official capacity as
Governor of Texas, *et al.*,

Defendants.

Case No.: 3:21-CV-00259-DCG-JES-JVB
[Lead Case]

ROY CHARLES BROOKS, *et al.*,

Plaintiffs,

v.

GREG ABBOTT, in his official capacity as
Governor of Texas, *et al.*,

Defendants.

Case No. 1-21-CV-00991-DCG-JES-JVB
[Consolidated Case]

BROOKS PLAINTIFFS' WITNESS LIST

Brooks Plaintiffs designate the following witnesses they plan to call at the upcoming hearing on the pending motions for preliminary injunction. Only those witnesses that are likely to be called live are listed here. Other witnesses may be presented by deposition designation.

Individual	May Call	Will Call
Ana Juarez		X
Representative Joe Moody		X
Commissioner Rodney Ellis	X	
Senator Royce West		X
Senator Cesar Blanco	X	
Representative Christian Manuel	X	

Individual	May Call	Will Call
Representative Gene Wu	X	
Representative Ramón Romero		X
Representative Senfronia Thompson		X
Christina Elbitar		X
Kelly Allen-Gray		X
Senator Carol Alvarado		X
Matt Barreto, PhD		X
Sean Trende, PhD		X
Senator Jose Mennedez	X	

Dr. Sean Trende may be called to testify about alternative map analyses and the use of race in redistricting.

September 30, 2025

Respectfully submitted,

/s/ Chad W. Dunn

Chad W. Dunn (Tex. Bar No. 24036507)
Brazil & Dunn
1900 Pearl Street
Austin, TX 78705
(512) 717-9822
chad@brazilanddunn.com

Mark P. Gaber

Mark P. Gaber*
Mark P. Gaber PLLC
P.O. Box 34481
Washington, DC 20043
(715) 482-4066
mark@markgaber.com

Jesse Gaines* (Tex. Bar. No. 07570800)
6015 Meadowbrook Drive
Fort Worth, Texas 76112
(817) 654-1161
gainesjesse@ymail.com

Molly E. Danahy*
P.O. Box 51
Helena, MT 59624
(406) 616-3058
danahy.molly@gmail.com

Sonni Waknin*
6417 N. Figueroa Street, #10
Los Angeles, California 90042
732-610-1283
sonniwaknin@gmail.com

*Admitted *pro hac vice*

Counsel for the Brooks Plaintiffs

CERTIFICATE OF SERVICE

I certify that all counsel of record were served a copy of the foregoing this 29th day of September 2025, by email.

/s/ Mark P. Gaber

Mark P. Gaber