

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION

TERRY PETTEWAY, <i>et al.</i> ,	§	
	§	
<i>Plaintiffs,</i>	§	
	§	
v.	§	
	§	Civil Action No. 3:22-cv-57
GALVESTON COUNTY, TEXAS, <i>et</i>	§	
<i>al.</i> ,	§	
	§	
<i>Defendants.</i>	§	

UNITED STATES OF AMERICA,	§	
	§	
<i>Plaintiff,</i>	§	
	§	
v.	§	
	§	Civil Action No. 3:22-cv-93
GALVESTON COUNTY, TEXAS, <i>et</i>	§	
<i>al.</i> ,	§	
	§	
<i>Defendants.</i>	§	

DICKINSON BAY AREA BRANCH NAACP, <i>et al.</i> ,	§	
	§	
<i>Plaintiffs,</i>	§	
	§	
v.	§	
	§	Civil Action No. 3:22-cv-117
GALVESTON COUNTY, TEXAS, <i>et</i>	§	
<i>al.</i> ,	§	
	§	
<i>Defendants.</i>	§	

JOINT PLAINTIFFS’ EMERGENCY MOTION FOR REMEDIAL ORDER

Today, the Fifth Circuit entered the attached order clarifying that the administrative stay of this Court’s injunction terminated on November 28, 2023. No other stay has been granted or requested. Accordingly, this Court’s injunction barring Defendants from using the invalidated map

is in effect, and any action by the Defendants to move forward with an election under the enjoined map would be contrary to the Court's injunction.

In light of the forthcoming December 11 candidate filing deadline, all Plaintiffs respectfully request that the Court enter an order to clarify its prior remedial orders. The Court's order denying the County's motion for a stay provided that the Commissioners Court could adopt a proposed remedial plan or, in the alternative, choose between the Fairfax plan or Map 1. Given the date, Plaintiffs respectfully request that the Court enter an order clarifying that Map 1 will be the remedial plan absent further action by the County described below. The County conceded at trial that Map 1 contains compact precincts, was not drawn on the basis of race, and is lawful. Plaintiffs propose the Court nevertheless provide that the Commissioners Court may adopt and file an alternative remedial proposal by 5 p.m. on Tuesday, December 5. If it does so, Plaintiffs propose to be provided until 5 p.m. on Wednesday, December 6 to file any objections to that proposed plan.

Respectfully submitted this 30th day of November, 2023.

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CERTIFICATE OF SERVICE

I certify that on November 30, 2023, the foregoing document was filed electronically and served on all parties of record via CM/ECF.

/s/Chad W. Dunn
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