

**CAUSE NO. 2022-74979**

HARRIS COUNTY REPUBLICAN	§	
PARTY AND CINDY SIEGEL,	§	IN THE DISTRICT COURT
CHAIR OF THE HARRIC	§	
COUNTY REPUBLICAN PARTY	§	
	§	
Plaintiffs,	§	
	§	
v.	§	157th JUDICIAL DISTRICT
	§	
CLIFFORD TATUM, in his official	§	
capacity as Harris County Election	§	
Administrator, and HARRIS	§	
COUNTY, TEXAS.	§	
	§	HARRIS COUNTY, TEXAS
Defendants.	§	

**SWORN MOTION TO RETAIN**

Plaintiffs file this Sworn Motion to Retain pursuant to TRCP 165a and, in support hereof, would show unto the Court as follows:

1. This dispute arises out of the Harris County Election Administrator's handling of the November 8, 2022 General Election in Harris County.
2. Plaintiffs seek both declaratory and prospective-only injunctive relief.
3. The Defendants will file pleas to the jurisdiction once they are served, and this Court will rule on those pleas based, at least in part, on the allegations contained within the Plaintiffs' live pleading.

4. In order to enhance the chances that this Court will deny the Defendants' pleas to the jurisdiction, Plaintiffs have been waiting on a bench verdict in an election contest filed by Erin Lunceford against Judge Tamika Craft, Cause No. 2022-79328. Judge David Peeples of Bexar County was assigned to that election contest, and yesterday he informed the parties that he will issue his verdict in early November. That ruling will play a crucial role in how this lawsuit plays out. As soon as the verdict is announced, then the undersigned will file an amended pleading within seven (7) days. Once that amended pleading is filed, then the Plaintiffs intend to serve both Defendants, at which time each Defendant is expected to file a plea to the jurisdiction.

5. Plaintiffs intend to prosecute this civil lawsuit and do not wish it to be dismissed for want of prosecution. Plaintiffs have shown good cause to retain this lawsuit on the Court's active docket.

6. This Motion is verified.

#### **PRAYER**

WHEREFORE, PREMISES CONSIDERED, Plaintiffs respectfully pray that this case be retained on the Court's active docket.

Respectfully submitted,

ANDY TAYLOR & ASSOCIATES, P.C.

BY: /s/ Andy Taylor  
Andy Taylor

State Bar No. 19727600  
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713-222-1817 (telephone)  
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**ATTORNEY FOR PLAINTIFFS**

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**VERIFICATION OF ANDY TAYLOR BY DECLARATION**

STATE OF TEXAS	§
	§
COUNTY OF WASHINGTON	§

I, Andy Taylor, do hereby declare under the penalty of perjury that the following is true and correct:

My name is Andy Taylor, my date of birth is December 30, 1961, and my business address is 2628 Highway 36 South #288, Brenham, Texas. I am the counsel of record for both Plaintiffs in this case. I am over the age of 18 years of age, of sound mind, and capable of making this declaration. The facts stated herein are within my personal knowledge and are true and correct. I have read Plaintiffs' Motion to Retain and can state that the facts stated therein are within my personal knowledge and are true and correct.

Executed in Washington County, State of Texas, on the 18th day of October, 2023.

  
Andy Taylor

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