7/5/2023 2:20 PM
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Envelope No. 77220124
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Filed: 7/5/2023 2:20 PM

CAUSE NO. 2023-00964

ALEXANDRA MEALER, REPUBLICAN GENERAL ELECTION CANDIDATE FOR HARRIS COUNTY JUDGE, CONTESTANT	§	IN THE DISTRICT COURT
V.	§	133RD JUDICIAL DISTRICT
HON. LINA HIDALGO, DEMOCRATIC GENERAL ELECTION CANDIDATE FOR HARRIS COUNTY JUDGE, CONTESTEE	§	HARRIS COUNTY, TEXAS

CONTESTEE'S MOTION FOR NO-EVIDENCE SUMMARY JUDGMENT

The Contestees represented by Susman Godfrey LLP (the Honorable Lina Hidalgo, the Honorable Marilyn Burgess, the Honorable Carla Wyatt, and the Honorable Teneshia Hudspeth), collectively "Contestees," move for a no-evidence summary judgment in their cases because Contestants have no evidence that raises a genuine issue of fact that the outcomes of their 2022 elections were not the "true outcomes." Tex. Elec. Code § 221.003(a). The margins of victory in these four elections were large, all more than 18,000 votes:

- Hidalgo's victory over Mealer: **18,183 votes**
- Burgess's victory over Daniel: **25,640 votes**
- Hudspeth's victory over Stanart: **34,448 votes**
- Wyatt's victory over Scott: **34,742 votes**

To Contestees' knowledge, no losing candidate in a Texas election has ever successfully challenged a margin anywhere close to even the narrowest of these. As shown in the table attached as Exhibit 1, which gathers margins for every reported successful election contest in Texas that

Contestees have been able to locate, the largest successfully challenged margin was just ***403 votes***. *Gonzalez v. Villarreal*, 251 S.W.3d 763, 765, 783 (Tex. App—Corpus Christi—Edinburg 2008, pet. dism'd.). Thus, Contestants are challenging election margins that are 45 to 86 times greater than any margin successfully challenged in Texas history. It is a cynical and outrageous assault on our democracy.

Contestants seek a literally unprecedented result based on two alleged issues that do not come remotely close to calling into question the enormous margins in these four contests: (1) some polling locations allegedly opened late; (2) some polling locations allegedly did not have adequate supplies, including paper ballots and working machines. Pet. ¶ 6; *see also* Ex. 2 (Alvarez email identifying issues). Contestants' theory is misguided and inconsistent with Texas law. Their view is that if a voter left a polling location when confronted with one of these issues, that voter was "prevented" from voting. Pet. ¶ 15. But Harris County voters had the option to vote at any of 785 polling locations, so confronting a delay at one polling location (which voters confront all the time) did not prevent that voter from voting. The voter simply had to go to another location. Cases where courts have found voters were prevented from voting involved a categorical bar on voting that is not present in the case. In *Denny v. Doss*, for example, a trial court ruled and an appellate court affirmed that voters were prevented from voting in a primary election when that primary election was mistakenly left off the voters' ballots. No. 02-20-00113-CV, 2020 WL 2071949, at *1 (Tex. App.—Fort Worth Apr. 30, 2020, no pet.). The voters in *Denny* had no opportunity to vote at all. The voters in the 2022 Harris County elections simply had to return later or go to one of the 784 other locations.

Even if Contestants were correct that voters who were delayed by one of the two alleged issues were "prevented" from voting, Contestants have no evidence that 34,742 voters left a polling

location when confronted with one of the two alleged issues and then decided not to vote (at any of 785 voting locations). To succeed under this mistaken theory in even the case with the closest margin, Contestant Mealer must show that at least 18,183 eligible voters left a polling place and decided not to vote anywhere. Contestants have no evidence that these two issues resulted in at least 18,183 eligible voters leaving a polling place, let alone that these issues resulted in at least 18,183 eligible voters leaving a polling place and then deciding not to vote.[1] In their discovery responses, Contestants have made no effort to identify any evidence that demonstrates there was such a significant number of voters who left a polling place and decided not to vote. Exs. 3, 4. In other pending election contests before this Court, contestants have provided affidavits alleging that 2,989 voters left a polling location without voting because of these issues, a far lower number than 18,183 voters. And even those contestants have produced no evidence that any significant number of those voters decided not to return to vote later and not to vote at one of the 784 other polling locations that were open on election day.

Contestants' complete lack of evidence should be considered within the context that Contestants and their political allies have tried diligently since November 2022 (over six months ago) to identify voters that allegedly did not vote because of the alleged issues. Websites to gather such information from voters have been widely touted in the media. To the best of Contestants' knowledge, all these efforts have led to *one* single voter saying that she decided not to vote after confronting one of the issues alleged in Contestants' petition. Not only have Contestants failed to

[1] Contestees are moving for summary judgment in four different cases, which have four different margins, ranging from 18,183 votes to 34,742 votes. In this motion, Contestees refer to the 18,183-vote margin because there is no evidence to overcome that margin, the narrowest, so there is also no evidence to overcome any of the three greater margins. Each individual Contestant should be required to identify evidence to overcome the margin in its election, however, so Scott must provide evidence to overcome a 34,742-vote margin, notwithstanding the references in this motion to the 18,183-vote margin.

identify a single voter who did not vote after confronting the issues they allege, through counsel they have stated on the record that claims like those offered by declarants in the *Lunceford* case are not credible or reliable, and have disclaimed any intention of identifying specific voters who were affected by the issues they allege.

Lacking any evidence to demonstrate that at least 18,183 eligible voters left a polling place and then decided not to vote, Contestants in these four cases say that they will instead prove their case through "data science." During the March 2, 2023 hearing, this Court asked Contestants to identify the legal support for their "data science" theory:

> I would like you to send to everybody some of the case law where something similar to this had been done in another state and appealed and an opinion written that would be useful that would help educate me on what you will be advocating. And I want you to find some of that and send it with a copy to everybody on the email chain.

Ex. 5 (Mar. 2, 2023 Tr.) 34:15–21. In response, Contestants did not identify any court in the nation, whether trial or appellate, that has ever accepted Contestants' theory of proof in an election contest, and certainly not as a basis to overturn an election with a margin of at least 18,183 votes. Instead, Contestants pointed to secondary literature, including student law review notes, that deals with inapposite situations such as where a jurisdiction completely eliminates a polling place prior to an election. Contestants' secondary literature does not deal with the issues they have alleged in their petition where voters allegedly left a polling location when confronted with various obstacles but could have voted at any of 785 polling locations. The articles provided by Contestants are irrelevant hearsay, and they are not *evidence* that in the 2022 Harris County elections at least 18,183 eligible voters left a polling place and decided not to vote. To the contrary, the articles are a plain effort by Contestants to avoid the evidence, which shows that far fewer than 18,183 voters left a polling location because of the issues they have identified and that the number who then chose not to vote at all was miniscule, if there were any at all. Contestants cannot raise a genuine

issue of fact about the "true outcome" of their elections by citing abstract and theoretical articles that have no tether to the facts of the 2022 election and the enormous margins in these four races.

If Contestants' unprecedented approach in these cases were accepted, the Court would open a Pandora's Box of anti-democracy evils. Every election in the state of Texas would be subject to challenge without any consideration of the evidence regarding the will of specific voters. Contestants have sought to overturn these four elections with margins of more than 18,183 votes based on "data science" theories about what hypothetical voters might have done when confronted with election day obstacles even though there is no evidence that actual voters, with one potential exception, behaved in this fashion. If these four far-fetched cases can move forward to trial at considerable cost and distraction to the winning candidates and the County, there will be no reason for any losing Texas candidate, in any county, not to take a shot at filing an election contest. Meritless contests, which cost the winning candidates time and money and consume taxpayer resources by burdening counties (as it would cities and the state itself), will become the routine tactic of sour grapes losing candidates. That would be enormously detrimental to government at every level in Texas, and to public confidence in the electoral process. The Court should reject these four unfounded election contests, which have no evidentiary support whatsoever, grant this motion for no-evidence summary judgment, and dismiss these four contests.

ARGUMENT

Under Texas Rule of Civil Procedure 166a(i), "[a]fter adequate time for discovery, a party without presenting summary judgment evidence may move for summary judgment on the ground that there is no evidence of one or more essential elements of a claim or defense on which an adverse party would have the burden of proof at trial." Once a party files a no-evidence motion, the respondent has the burden of proof. *First United Pentecostal Church of Beaumont v. Parker*, 514 S.W.3d 214, 219 (Tex. 2017). "The court must grant the motion unless the respondent

produces summary judgment evidence raising a genuine issue of material fact." Tex. R. Civ. P. 166a(i). "The evidence does not create an issue of material fact if it is so weak as to do no more than create a mere surmise or suspicion that the fact exists." *First United*, 514 S.W.3d at 220 (internal quotation marks and citation omitted).

There is no dispute that Contestants have had an adequate time for discovery. They agreed to the April 20, 2023 Scheduling Order that this Court entered, which established that on July 5, 2023, "contestants will have had an adequate time for discovery and a Rule 166a(i) no-evidence motion will be timely under the Rules." Ex. 6. That date has passed.[2]

Though Contestants have had an adequate time for discovery, they have not identified evidence raising a genuine issue of fact about the true outcome of their elections, so the Court should grant this motion. Texas Election Code § 221.003 establishes that the "tribunal hearing an election contest shall attempt to ascertain whether the outcome of the contested election, as shown by the final canvass, is not the true outcome because (1) illegal votes were counted; or (2) an

[2] In recent correspondence with the Court, Contestants' counsel has suggested they will seek to challenge this date because Contestants' counsel was unable to take the deposition of Clifford Tatum on June 23, 2023. Contestees take no position on the issues surrounding why that deposition did not go forward, but the delay of this deposition should not change the agreed date on which Contestees may file their no-evidence motions nor delay the prompt resolution of the motions. These contests have been pending since January and the Court issued the agreed scheduling order on April 20, 2023, which established the July 5 date for filing no-evidence motions. Contestants have had plenty of time to take the deposition of Tatum, who was deposed once already in the Lunceford case without the attendance of Contestants' counsel. Most importantly, Tatum will not provide the evidence Contestants need to overcome this motion since he has no evidence that at least 18,183 voters left a polling place on election day because of the issues alleged and then chose not to vote. If Tatum had such knowledge, it would be well-known by now and would have come out during the deposition in the Lunceford case. Contestants' counsel, of course, has stated on the record that any such counts of voters would not be credible anyway. Focusing her case solely on data science, she should not be heard to complain about the delay of a deposition (of a witness who already has been deposed) whose testimony cannot support a data science theory of proof. Contestants have had an adequate time to take discovery and should not be permitted to delay resolution of this motion.

election officer or other person officially involved in the administration of the election: (A) prevented eligible voters from voting; (B) failed to count legal votes; or (C) engaged in other fraud or illegal conduct or made a mistake."

Texas Election Code § 221.012 establishes that if "the tribunal hearing an election contest can ascertain the true outcome of the election, the tribunal shall declare the outcome" and the "tribunal shall declare the election void if it cannot ascertain the true outcome of the election." In their shared petition, Contestants rely on each of the three theories under Texas Election Code § 221.003(a)(2). Contestees address each below.

A. Contestants have no evidence that raises a genuine issue of fact that election officials prevented at least 18,183 eligible voters from voting, so they cannot raise a factual dispute regarding the true outcome of any of these four elections

Contestants first allege that election officials "prevented eligible voters from voting." Pet. ¶ 15. To prevail on this theory in any of these cases, Contestants must prove three elements: (1) "an election officer or other person officially involved in the administration of an election" prevented at least 18,183 potential voters from voting, (2) the potential voters were eligible to vote, and (3) the true outcome of the election cannot be ascertained. Tex. Elec. Code § 221.003(a)(2)(A); *id.* § 221.012. Contestants have no evidence of these three elements.

First, Contestants have no evidence that Harris County election officials prevented at least 18,183 potential voters from voting. Contestants have alleged that because some polling locations allegedly opened late and some polling locations allegedly ran out of supplies, voters left polling locations and then decided not to vote. Contestants have not identified evidence that 18,183 people left a polling location at all, let alone that they did not return to vote later or choose to vote elsewhere. Contestants also cannot present evidence that these voters were *prevented* from voting given that the voters were free to vote at any of 785 polling locations in Harris County. This situation does not resemble the cases where courts have found voters were prevented from voting,

where the voter had no opportunity to vote because of an elected official's action. *E.g.*, *Denny*, 2020 WL 2071949, at *1 (affirming a trial court ruling that voters were prevented from voting in a primary election when that primary election was mistakenly left off the voters' ballots). Contestants in fact admitted in their responses to Contestees' requests for admission that they cannot prove that voters were prevented from voting: "They admit it is impossible that a particular individual did not vote because they were turned away, but deny that they cannot prove through established methodology to the appropriate standard of proof approximately how many people did not vote when their preferred location was shut down, even for a short time." Ex. 4 at 38. This admission is not consistent with a theory that voters were prevented from voting, and it forecloses Contestants from relying on Tex. Elec. Code § 221.003(a)(2)(A). It is no answer to spout an alternative methodology that has never been used by any court in this state in an election contest.

Moreover, as explained above, Contestants have sought to avoid the evidence and rely on inadmissible secondary literature dealing with unrelated situations, not the situation in the 2022 Harris County election where voters could vote at 785 different locations and allegedly confronted temporary delays in voting at only certain locations.

Courts have consistently held that speculative theories of proof like Contestants' do not satisfy a contestant's "heavy burden" to "produce proof of a sufficient number of specific votes affected by the irregularities greater than the margin of victory." *Launius v. Flores*, 2021 WL 7967977, at *27–28 (Tex. Dist. Mar. 17, 2021); *see also Olsen v. Cooper*, 24 S.W.3d 608, 612–13 (Tex. App.—Houston [1st Dist.] 2000, no pet.) (dismissing election contest that was based on a contestant's testimony "as to his 'feeling' that many voters must have been prevented from voting for him because of the complained-about irregularities"); *Honts v. Shaw,* 975 S.W.2d 816, 823–24 (Tex. App.—Austin 1998, no pet.) (dismissing election contest where "no witness testified he was

prevented from voting"). This is true even where the contestant supports its theory with expert testimony. *See O'Cana v. Salinas*, No. 13-18-00563-CV, 2019 WL 1414021, at *9–11 (Tex. App. Mar. 29, 2019, pet. denied)) (dismissing election contest because the witness "guessed" on the "quantity of ballots" affected and the expert opinion "regarding the quantity of harvested ballots" improperly ignored "other eminently plausible reasons for this scenario").

Second, even if Contestants had evidence that election officials prevented at least 18,183 people from voting, which they do not, they would also need evidence that these people were eligible voters, and they have no such evidence. Of course, by refusing to engage with specific voters and instead rely on "data science," it is impossible for Contestants to prove the eligibility of any one of these hypothetical and unidentified voters.

Third, the Contestants lack any evidence to raise a genuine issue of fact that the true outcome of these four elections is unascertainable. Tex. Elec. Code § 221.012. For Contestants to satisfy this element, they would need evidence raising a genuine fact issue that at least 18,183 voters were prevented from voting based on the two theories they have alleged, and they have no such evidence. Instead, as explained above, the Contestants have sought to avoid the evidence and rely on inadmissible secondary literature dealing with unrelated situations, not the situation in the 2022 Harris County election where voters could vote at 785 different locations and allegedly confronted temporary delays in voting at certain locations.

B. Contestants have no evidence that raises a genuine issue of fact that election officials failed to count at least 18,183 votes, so they cannot raise a factual dispute regarding the true outcome of any of these four elections

Contestants next allege that election officials failed to count legal votes. Pet. ¶ 15. To prevail on this theory in any of these four cases, Contestants must prove two elements: (1) election officials failed to count at least 18,183 votes, and (2) as a result the true outcome of the election

cannot be ascertained. Tex. Elec. Code § 221.003(a)(2)(B); *id.* § 221.012. Contestants have no evidence of these two elements.

First, Contestants have no evidence that election officials failed to count at least 18,183 votes. Contestants have not alleged that election officials failed to count votes that were cast. Rather, they are solely alleging that election officials failed to count votes that *should* have been cast but were not cast because of the two issues they identified. *See, e.g.*, Pet. ¶ 14 n.11 ("Contestants only contend that the votes that should have counted but were not counted exist to the extent they refer to the same votes as those the otherwise lawful voters who were disenfranchised by the County's failure to open locations on time or adequately disseminate supplies would have cast but for the county's malfeasance and/or negligence.").

Simply put, the Texas Election Code does not recognize a "vote" that was not actually cast, let alone require the counting of any such "vote." Instead, the Texas Election Code requires that:

- Votes are cast "by official ballot." Tex. Elec. Code § 52.001(a) (stating "the vote in an election is by official ballot");
- Voters cast votes for candidates by making a specific indication on the ballot. Tex. Elec. Code § 64.003 ("A vote for a particular candidate whose name is on the ballot must be indicated by placing an 'X' or other mark that clearly shows the voter's intent in the square beside the name of the candidate for whom the voter desires to vote.");
- The "ballots shall be counted." Tex. Elec. Code § 65.001 ("At each polling place, the ballots shall be counted by one or more teams of election officers assigned by the presiding judge."); and
- The votes for each candidate that are to be counted are those cast on a ballot. Tex. Elec. Code § 65.005(a) ("One member of the counting team shall examine each ballot and

clearly announce the name of each candidate for whom a vote has been received or whether a vote has been received for or against a measure.").

Because Contestants' claims only involve hypothetical "votes" that were *never* actually cast by any voter, Contestants do not contend—let alone present evidence—that election officials failed to count a single legal vote as required by the Texas Election Code.[3]

Even if this is a valid application of Texas Election Code § 221.003(a)(2)(B), which Contestees do not concede, Contestants have no evidence that at least 18,183 eligible votes were not cast because of the two issues they have identified in their petition. As explained above, there is no evidence that anywhere near that number of voters left a polling location because of the issues alleged, much less that they decided not to return to vote later or to vote at one of the other 784 polling locations available to them.

Second, the Contestants lack any evidence to raise a genuine issue of fact that the true outcome of these four elections is unascertainable. Tex. Elec. Code § 221.012. For Contestants to satisfy this element, they would need evidence raising a factual dispute that at least 18,183 voters did not have their votes cast and counted because of the theories alleged, and they have no such evidence. Moreover, as explained above, Contestants have sought to avoid the evidence and rely on inadmissible secondary literature dealing with unrelated situations concerning pre-election poll closures, not the situation in the 2022 Harris County election where voters could vote at 785 different locations and allegedly confronted temporary delays in voting at certain locations. Thus, as courts have consistently held when evaluating similarly speculative election contests, Contestants' inadmissible secondary literature, even if supported by Contestants' yet-to-be-

[3] Conversely, if election officials had actually done what Contestants claim they failed to do—namely, to count hypothetical votes that were never actually cast on any ballot by any voter—those actions would be in direct violation of the Texas Election Code.

disclosed expert opinion, falls far short of satisfying Contestants' "heavy burden" to "produce proof of a sufficient number of specific votes affected by the irregularities greater than the margin of victory." *Launius*, 2021 WL 7967977, at *27–*28; *O'Cana*, 2019 WL 1414021, at *9–11; *Olsen*, 24 S.W.3d at 612–13; *Honts,* 975 S.W.2d at 823–24.

C. Contestants have no evidence that raises a genuine issue of fact that election officials engaged in fraud or illegal conduct or made a mistake that made the true outcome of any of these four elections unascertainable

Contestants also allege that an election officer or officers "engaged in fraud and other illegal conduct or mistakes which made the true result unknowable." Pet. ¶ 15; *see also* Pet. ¶ 16. To prevail on this theory, Contestants must prove one of the three following elements: (1) election officials engaged in fraud, (2) election officials engaged in illegal conduct, or (3) election officials made mistakes. Tex. Elec. Code § 221.003(a)(2)(C). In addition, they must prove that this conduct made the true outcome unascertainable. *Id.* § 221.012.

Contestants have no evidence of the element of this claim that the alleged conduct made the true outcome of the election unascertainable, so they cannot prevail on this claim.[4] The alleged conduct that Contestants identify as fraud, illegal conduct, and mistake is the same two categories of conduct that they cite for each of their theories: (1) some polling locations allegedly opened late, and (2) some polling locations allegedly did not have adequate supplies, including paper ballots and working machines.[5] Contestees dispute that this conduct amounts to fraud, illegal conduct, or mistake, but that dispute does not control the outcome of this motion because even if the conduct could amount to fraud, illegal conduct or mistake, the conduct did not make the true

[4] Contestants also have no evidence that election officials engaged in fraud or illegal conduct, but this is not dispositive to the outcome of this motion.

[5] At paragraph 17 of their petition, Contestants attempt to rely on "any other mistakes made by the County." Contestants do not identify these "any other mistakes," and there is no evidence of any other alleged mistakes that made the true outcome of the election unascertainable, so this unsupported allegation does not allow Contestants to overcome this motion.

outcome of the election unascertainable. Contestants have no evidence that the alleged late openings and alleged inadequate supplies resulted in at least 18,183 voters leaving a polling place and then deciding not to vote. There is no evidence that anywhere near this number of voters left a polling place and decided not to vote because they confronted one of the two alleged issues. Without this evidence, Contestants cannot prevail on this theory or any of their three theories under Texas Election Code § 221.003(a)(2). Contestees are entitled to judgment as a matter of law against Contestants' claims.

CONCLUSION

Contestants have not identified evidence that raises a genuine issue of fact that the "true outcome" of these four elections is unascertainable. They have not shown that the conduct they alleged prevented at least 18,183 voters from voting in the 2022 Harris County elections. They have not even provided evidence that at least 18,183 voters left a polling location and decided not to vote based on the two issues they have alleged. Contestants lack evidence to support their contests, and this Court should grant this motion and dismiss these four contests.

Dated: July 5, 2023

Respectfully Submitted,

By: */s/ Neal S. Manne*

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CERTIFICATE OF SERVICE

This is to certify that on July 5, 2023, a true and correct copy of the above and foregoing instrument was properly forwarded to all counsel of record in accordance with Rule 21 of the Texas Rules of Civil Procedure.

/s/ Neal S. Manne
Neal S. Manne

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Status as of 7/6/2023 7:54 AM CST

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