

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

THE STATE OF TEXAS,

*Plaintiff,*

v.

BRUCE ELFANT, in his official capacity  
as Travis County Texas Assessor-Collector  
and Voter Registrar; ANDY BROWN, in his  
official capacity as Travis County Judge;  
JEFF TRAVILLION, in his official capacity  
as Travis County Commissioner; BRIGID  
SHEA, in her official capacity as Travis  
County Commissioner; ANN HOWARD, in  
her official capacity as Travis County  
Commissioner; MARGARET GÓMEZ, in  
her official capacity as Travis County  
Commissioner.

*Defendants.*

Cause No. 1:24-cv-01096-DII

**DEFENDANTS' ADDITIONAL RESPONSE TO  
PLAINTIFF'S MOTIONS FOR REMAND**

Defendants hereby file this response to Plaintiff's improperly titled and unnecessarily filed "Third Motion for Remand" and would show the following. Plaintiff filed their original motion to remand on September 17, 2024. *See* Doc. 2. Thereafter, the Plaintiff has supplemented that motion twice. *See* Doc. 12 & 14. Defendants have not been served with a second motion to remand. Nevertheless, should there be a second iteration, this response shall apply to it as well.

In response to the subsequent motion(s) to remand, Defendants incorporate the filings made with respect to the original motion to remand including specifically docket numbers 13 and 16. For the reasons stated in the notice of removal and the responses to motion to remand by filed Defendants, the court should decline to remand this case and instead resolve the matters, specifically with respect to the legal issues this case presents under the National Voter Registration Act.

Dated: October 3, 2024

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on October 3, 2024, I electronically filed the foregoing document with the Clerk of the United States District Court for the Western District of Texas, Austin Division, using the electronic case filing system of the Court. The electronic case filing system sent a “Notice of Electronic Filing” to attorneys of record who have consented in writing to accept this Notice as service of this document by electronic means.

By: /s/ Chad W. Dunn  
Chad W. Dunn

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