

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
FORT WORTH DIVISION**

WINNIE JACKSON, *et al.*,

Plaintiffs,

v.

TARRANT COUNTY, TEXAS, *et al.*,

Defendants.

CIVIL ACTION NO. 4:25-cv-00587-O

PLAINTIFFS' MOTION FOR A PRELIMINARY INJUNCTION

Pursuant to Federal Rule of Civil Procedure 65(a), Plaintiffs respectfully move for a preliminary injunction on Counts 1, 2, 3, and 4 of their First Amended Complaint. Specifically, as Plaintiffs explain in the accompanying Brief, they are likely to succeed on their claims that the commissioners precinct map adopted by Defendant Tarrant County Commissioners Court on June 3, 2025 ("Map 7") violates (1) Section 2 of the Voting Rights Act, 52 U.S.C. § 10301, because it results in racially discriminatory disenfranchisement of voters who were otherwise eligible to cast a ballot for commissioner in 2026 but now must wait six year until 2028 because they were shifted from an even- to an odd-numbered precinct, (2) the First and Fourteenth Amendment by disenfranchising voters from casting a ballot for commissioner in 2026 without any population equalization necessity and in a manner that discriminates on the basis of race and political viewpoint, and (3) the Fourteenth and Fifteenth Amendments by intentional racial vote dilution against Black and Latino voters in the configuration of commissioner precincts. As Plaintiffs explain, they are irreparably harmed in the absence of injunctive relief and the balance of equities favors an injunction.

CONCLUSION

For the foregoing reasons and as set forth in the accompanying brief and supporting appendix, Plaintiffs' motion for a preliminary injunction should be granted.

Dated: June 27, 2025

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Respectfully submitted,

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CERTIFICATE OF CONFERENCE

Pursuant to Local Rule 7.1(b), Plaintiffs' counsel Mark Gaber conferred with counsel for Defendants, Assistant Tarrant County District Attorneys Mark Kratovil and Craig Price, via e-mail correspondence between June 20 and June 25, 2025. The parties discussed (1) service of process and (2) Defendants' position regarding Plaintiffs' motion for a preliminary injunction and their motion for an expedited hearing and consolidation of the trial with the preliminary injunction hearing on Counts 1 and 2. With respect to service of process, the process server had informed Plaintiffs' counsel that Judge O'Hare's staff rejected repeated attempts at personal delivery of the complaint and summons. Defendants' counsel offered to waive service in exchange for a response deadline extension to August 4, 2025. Plaintiffs' counsel explained that in an ordinary case this would be agreeable, but the need for expedited adjudication did not permit them to voluntarily agree to such an extension. On June 25, 2025, the process server informed counsel for Plaintiffs that Judge O'Hare has agreed to accept personal service from the process server on the afternoon of Monday, June 30.

With respect to (1) Plaintiffs' motion for a preliminary injunction, (2) Plaintiffs' proposal for an early August hearing and a decision by September 12, 2025, and (3) Plaintiffs' request for consolidation and advancement of the trial on Counts 1 and 2 with the preliminary injunction hearing, Defendants' counsel stated the following: "[w]ith regard to your request about the County's position on the various scheduling issues in your email below, the County has not been briefed on these issues, nor can such a briefing occur before the July 1 meeting. Therefore, I cannot provide you with a response at this time."

June 27, 2025

/s/ Mark P. Gaber

CERTIFICATE OF SERVICE

On June 27, 2025, I served the foregoing on counsel for Defendants, who have not yet entered an appearance in this case, via email as indicated below.

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/s/ Mark P. Gaber