

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
LAREDO DIVISION**

Texas Alliance for Retired Americans, Sylvia
Bruni, DSCC, and DCCC,

Plaintiffs,

v.

RUTH HUGHS, in her official capacity as the
Texas Secretary of State,

Defendant.

Civil Action No. 5:20-cv-128

PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

Pursuant to Federal Rule of Civil Procedure 65(a), Plaintiffs Texas Alliance for Retired Americans, Sylvia Bruni, DSCC, and DCCC, for the reasons set forth in the memorandum of law filed concurrently with this Motion and supported by the exhibits and declarations submitted therewith, respectfully move for an order preliminarily enjoining RUTH HUGHS, in her official capacity as Texas Secretary of State, and her officers, agents, servants, employees, and successors, and all persons in active concert or participation with them, from implementing, enforcing, or giving any effect to House Bill 25, and ordering Defendant to ensure that all Texas voters have the option to vote straight ticket in the November 2020 General Election as well as any future general election occurring during the pendency of this litigation.

August 12, 2020

Respectfully submitted,

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**Pro Hac Vice* Forthcoming

CERTIFICATE OF CONFERENCE

Plaintiffs have filed this Motion and the Complaint in this case simultaneously. Pursuant to the Local Rules and Standing Orders and Procedures of this Court, I hereby certify that counsel for movant Plaintiffs attempted to obtain respondent Defendant's position on this Motion by contacting the Office of the Attorney General of Texas. The Attorney General's Office informed counsel for Plaintiffs that it is not yet representing the Secretary in this lawsuit, and as a result, it could not provide the Secretary's position on this Motion. As a result, Plaintiffs cannot yet report the Secretary's position on this Motion. Plaintiffs will file an amended certificate of conference upon learning the Secretary's position regarding this Motion.

Certified to on August 12, 2020

/s/ Skyler M. Howton
Skyler M. Howton

CERTIFICATE OF SERVICE

I hereby certify that on August 12, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system. As no counsel of record has appeared for Defendant, I further certify that I will have a copy of the foregoing document personally served on Defendant through a third-party process server.

/s/ Skyler M. Howton
Skyler M. Howton