

No. D-1-GN-20-001610

TEXAS DEMOCRATIC PARTY AND GILBERTO	§	IN THE DISTRICT COURT
HINOJOSA, IN HIS CAPACITY AS CHAIRMAN OF	§	
THE TEXAS DEMOCRATIC PARTY, JOSEPH	§	
DANIEL CASCINO and SHANDA MARIE	§	
SANSING,	§	
<i>Plaintiffs,</i>	§	
	§	
and	§	
	§	
ZACHARY PRICE, LEAGUE OF WOMEN VOTERS	§	
OF TEXAS, LEAGUE OF WOMEN VOTERS OF	§	
AUSTIN-AREA, MOVE TEXAS ACTION FUND,	§	TRAVIS COUNTY, TEXAS
WORKERS DEFENSE ACTION FUND,	§	
<i>Plaintiff-Intervenors</i>	§	
	§	
v.	§	
	§	
DANA DEBEAUVOIR, IN HER CAPACITY AS	§	
TRAVIS COUNTY CLERK,	§	
<i>Defendant.</i>	§	
	§	
STATE OF TEXAS,	§	
<i>Intervenor.</i>	§	201st JUDICIAL DISTRICT

NOTICE OF INTERLOCUTORY APPEAL

Pursuant to Texas Rules of Appellate Procedure 25.1(a) and 26.1(b), Intervenor the State of Texas, by and through its Attorney General, gives notice of appeal from the Order signed by Judge Tim Sulak on April 17, 2020 in Cause No. D-1GN-20-001610 and styled “*Texas Democratic Party, et al. v. Dana Debeauvoir, in her Capacity as Travis County Clerk.*” Said Order denied the Intervenor’s Plea to the Jurisdiction and granted Plaintiffs’ and Plaintiff-Intervenors’ application for a temporary injunction. The Order enjoins Travis County and its agents from enforcing Texas Election Code § 82.002 pending final judgment in this action. The Order similarly

purports to enjoin the State and State actors from enforcing Texas Election Code § 82.002 in an unspecified geographic area.

Intervenor is entitled to an interlocutory appeal pursuant to Civil Practice and Remedies Code section 51.014(a)(4) and (8), which allows for an immediate appeal from an order that grants a temporary injunction or that denies a plea to the jurisdiction. Intervenor appeals to the Third Court of Appeals. This is an accelerated appeal as provided by Texas Rule of Appellate Procedure 28.1. This is not a parental termination or child protection case, as defined in Rule 28.4.

Pursuant to Texas Civil Practice and Remedies Code § 51.014(b), all further proceedings in this court are stayed pending resolution of Intervenor's appeal. Upon filing of this instrument, the April 17, 2020 Temporary Injunction is superseded pursuant to Texas Civil Practice and Remedies Code section 6.001(b) and Texas Rule of Appellate Procedure 29.1(b).

Respectfully submitted,

KEN PAXTON
Attorney General of Texas

JEFFREY C. MATEER
First Assistant Attorney General

DARREN L. MCCARTY
Deputy Attorney General for Civil Litigation

THOMAS A. ALBRIGHT
Chief for General Litigation Division

/s/Anne Marie Mackin
ANNE MARIE MACKIN
Texas Bar No. 24078898
MICHAEL R. ABRAMS

Texas Bar No. 24087072
Assistant Attorneys General
P.O. Box 12548, Capitol Station
Austin, Texas 78711-2548
(512) 463-2798 | FAX: (512) 320-0667
anna.mackin@oag.texas.gov
michael.abrams@oag.texas.gov

**ATTORNEYS FOR INTERVENOR
STATE OF TEXAS**

CERTIFICATE OF SERVICE

I certify that on April 17, 2020, the foregoing instrument was served electronically through the electronic-filing manager in compliance with TRCP 21a to:

Chad W. Dunn
General Counsel
State Bar No. 24036507
Brazil & Dunn, LLP
4407 Bee Caves Road, Suite 111
Austin, Texas 78746
(512) 717-9822 Tel.
(512) 515-9355 Fax
chad@brazillanddunn.com

K. Scott Brazil
State Bar. No. 02934050
Brazil & Dunn, LLP
13231 Champion Forest Drive, Suite 406
Houston, Texas 77069
(281) 580-6310 Tel.
(281) 580-6362 Fax
scott@brazilanddunn.com

Dicky Grigg
State Bar No. 08487500
Law Office of Dicky Gregg, P.C.
4407 Bee Caves Road, Suite 111
Austin, Texas 78746
(512)474-6061 Tel.
(512)582-8560
dicky@grigg-law.com

Martin Golando
The Law Office of Martin Golando, PLLC
State Bar No. 24059153
N. Saint Mary's, Suite 700
San Antonio, Texas 78205
(210) 892-8543
martin.golando@gmail.com

ATTORNEYS FOR PLAINTIFFS

Joaquin Gonzalez

Texas Bar No. 24109935
Joaquin@texascivilrightsproject.org
Mimi Marziani
Texas Bar No. 24091906
mimi@texascivilrightsproject.org
Rebecca Harrison Stevens
Texas Bar No. 24065381
Beth@texascivilrightsproject.org
TEXAS CIVIL RIGHTS PROJECT
1405 Montopolis Drive
Austin, Texas 78741
(512) 474-5073 Telephone
(512) 474-0726 Facsimile

Edgar Saldivar
Texas Bar No. 24038188
esaldivar@aclutx.org
Thomas Buser-Clancy
Texas Bar No. 24078344
Tbuser-clancy@aclutx.org
Andre Segura
Texas Bar No. 24107112
asegura@aclutx.org
ACLU FOUNDATION OF TEXAS, INC
P.O. Box 8306
Houston, Texas 77288
(713) 325-7011 Telephone
(713) 942-8966 Fax

Sophia Lin Lakin
New York Bar No. 5182076
slakin@aclu.org
Dale E. Ho
New York Bar No. 4445326
dho@aclu.org
AMERICAN CIVIL LIBERTIES UNION
125 Broad Street, 18th Floor
New York, NY 10004
(212) 519-7836 Telephone
(212) 549-2654 Fax

ATTORNEYS FOR INTERVENOR-
PLAINTIFFS

Sherine Thomas
Sherine.Thomas@traviscountytexas.gov
Leslie Dippel
Leslie.Dippel@traviscountytexas.gov

ATTORNEYS FOR DANA DEBAEUVOIR
IN HER CAPACITY AS TRAVIS COUNTY CLERK

/s/Anne Marie Mackin
ANNE MARIE MACKIN
Assistant Attorney General