

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

STEVEN HOTZE, M.D.; WENDELL	§	
CHAMPION; HON. STEVE TOTH; and	§	
SHARON HEMPHILL,	§	
<i>Plaintiffs,</i>	§	Civil Action No. 4:20-cv-03709
	§	
v.	§	
	§	
CHRIS HOLLINS, in his official capacity as Harris	§	
County Clerk,	§	
	§	
<i>Defendant,</i>	§	
	§	
and	§	
	§	
MJ FOR TEXAS; DSCC; DCCC; MARY	§	
CURRIE; CARLTON CURRIE JR.; JEKAYA	§	
SIMMONS; DANIEL COLEMAN,	§	
<i>Proposed Intervenor-</i>	§	
<i>Defendants,</i>	§	
	§	
<i>and</i>	§	
	§	
STANLEY G. SCHNEIDER	§	
	§	
<i>Proposed Intervenor-</i>	§	
<i>Defendant.</i>	§	

MOTION TO INTERVENE BY STANLEY G. SCHNEIDER

Comes now Stanley G. Schneider, Proposed Intervenor-Defendant, in the above styled and numbered cause and presents this motion to intervene and would show this Court the following:

The Constitution of the United States guarantees all citizens the right to vote. Intervenor-Defendant is a registered voter in Harris County, Texas. I am 71 years of age. I have high blood pressure and I am an allergic asthmatic. I have made a conscious decision to do everything I can to prevent and protect myself from COVID-19.

I voted at NRG Stadium using the drive through voting process. I drove to the stadium. I then proceeded to drive to the designated area and presented my identification to a poll worker. I was then presented the same e-slate that I might use at a voting booth.

I voted in accordance with the procedures adopted by Harris County to facilitate voting for people during a pandemic. My request to intervene is my attempt to preserve my vote and the vote of others similarly situated. This attempt to disenfranchise me from this election is wrong.

Because the Plaintiff's wish to strip my right to vote in this election, I have an absolute right to intervene and voice my opposition to this attempt to draw chaos to the election.

Intervenor-Defendant would adopt the briefs and arguments of other Intervenor-Defendants in this cause. Intervenor-Defendant requests this Court to allow him to intervene. Further, Intervenor-Defendant requests that this Court allow the participation of other Intervenor-Defendants in the lawsuit so that the voice of actual voters who will be irreparably harmed be heard.

Respectfully submitted,

SCHNEIDER & MCKINNEY, P.C.

/s/ STANLEY G. SCHNEIDER

STANLEY G. SCHNEIDER

TBN: 17790500

440 Louisiana, Suite 800

Houston, Texas 77002

OFFICE: 713-951-9994

FAX: 713-224-6008

EMAIL: stans3112@aol.com

ATTORNEY FOR PROPOSED
INTERVENOR-DEFENDANT

CERTIFICATE OF CONFERENCE

Pursuant to the Local Rules and Standing Orders and Procedures of this Court, I hereby certify that undersigned counsel unsuccessfully attempted to contact with counsel for Plaintiff and Defendants by regarding this motion by email, both on November 2, 2020. Undersigned counsel conferred with Kenneth Barrett, counsel for Texas Coalition for Black Democrats, Jamie Lyn Royer, Michael Royer, Glenda Lee Greene and Jamie Lyn Watson is unopposed to this motion.

Undersigned counsel is aware of and wish to comply with Section 7(c)(3) of this Court's Civil Procedures, which state that the conference requirement under Local Civil Rule 7.1 will not be considered "satisfied by an unsuccessful attempt to reach opposing counsel occurring less than two full business days before a motion is filed." However, given that Plaintiffs expressly seek emergency relief in this suit, and that Election Day is just one business days from now, Intervenor-Defendant respectfully request that this Court consider his attempt to reach Plaintiffs' counsel sufficient to satisfy Local Rule 7.1.

/s/ STANLEY G. SCHNEIDER
STANLEY G. SCHNEIDER

CERTIFICATE OF SERVICE

I hereby certify that on November 2, 2020, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system, which automatically serves notification of the filing on counsel for all parties.

/s/ STANLEY G. SCHNEIDER
STANLEY G. SCHNEIDER