

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

Sylvia Bruni, Texas Democratic Party, DSCC,
DCCC, and Jessica Tiedt,

Plaintiffs,

v.

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

Defendant.

Civil Action No. 5:20-cv-35

PLAINTIFFS' MOTION FOR PRELIMINARY INJUNCTION

Pursuant to Federal Rule of Civil Procedure 65(a), Plaintiffs Sylvia Bruni, Texas Democratic Party, DSCC, DCCC, and Jessica Tiedt, 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.

March 30, 2020

Respectfully submitted,

/s/ Skyler M. Howton

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**Pro Hac Vice Application Pending*

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CERTIFICATE OF CONFERENCE

Pursuant to the Local Rules and Standing Orders and Procedures of this Court, I hereby certify that counsel for movant Plaintiffs and respondent Defendant have electronically conducted a conference at which there was a discussion regarding Defendant's position on Plaintiffs' Motion. The parties have been unable to resolve the matters presented in Plaintiffs' Motion.

Certified to on March 30, 2020

/s/ *Skyler M. Howton*

Skyler M. Howton

CERTIFICATE OF SERVICE

I hereby certify that March 30, 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