IN THE UNITED STATES DISTRICT COURT FOR THE WESTERN DISTRICT OF TEXAS SAN ANTONIO DIVISION

HOUSTON JUSTICE, HOUSTON AREA URBAN LEAGUE, DELTA SIGMA THETA SORORITY, INC., THE ARC OF TEXAS, and JEFFREY LAMAR CLEMMONS

Plaintiffs,

v.

GREGORY WAYNE ABBOTT, in his official capacity as Governor of Texas; JOSE ESPARZA, in his official capacity as Deputy Secretary of State of Texas; WARREN KENNETH PAXTON, JR., in his official capacity as Attorney General of Texas; JACQUE CALLANEN, in her official capacity as Elections Administrator of Bexar County; and ISABEL LONGORIA, in her official capacity as Elections Administrator of Harris County.

Defendants.

Civil Case No. 5:21-cy-00848-XR

PLAINTIFFS' NOTICE OF ERRATA

Plaintiffs Houston Justice, Houston Area Urban League, Delta Sigma Theta Sorority, Inc., the Arc of Texas, and Jeffrey Lamar Clemmons (collectively, "Plaintiffs") file this Notice of Errata regarding ECF No. 1, Plaintiffs' Complaint for Declaratory and Injunctive Relief (the "Complaint"), to correct the date on which the Governor signed S.B. 1, add the full signature of the attorney-in-charge—Kenneth E. Broughton, remove Natasha Merle as counsel for NAACP Legal Defense & Education Fund, Inc. from the signature block, as well as several minor formatting and grammatical errors. Plaintiffs attach a corrected Complaint and respectfully request that it be substituted for the pleading filed on September 7, 2021 (ECF No. 1).

Respectfully submitted September 9, 2021

REED SMITH LLP, NAACP LEGAL DEFENSE & EDUCATIONAL FUND, INC., THE ARC OF THE UNITED STATES, INC.

/s/ Kenneth E. Broughton

Kenneth E. Broughton Texas Bar No. 03087250 kbroughton@reedsmith.com

Lora Spencer Texas Bar No. 24085597 lspencer@reedsmith.com

J. Keely Dulaney*
Texas Bar No. 24116306
kdulaney@reedsmith.com

Reed Smith LLP 811 Main Street, Suite 1700 Houston, TX 77002-6110 Telephone: (713) 469-3800 Facsimile: (713) 469-3899

Sarah M. Cummings
Texas Bar No. 24094609
Reed Smith LLP
2850 N. Harwood Street, Suite 1500
Dallas, TX 75201
Telephone: (469) 680-4200

Facsimile: (469) 680-4299 scummings@reedsmith.com

Kathryn Sadasivan*
NAACP Legal Defense and Educational Fund, Inc.
40 Rector Street, 5th Floor
New York, NY 10006
Phone: (212) 965-2200
Favor (212) 226, 7502

Fax: (212) 226-7592 nmerle@naacpldf.org ksadasivan@naacpldf.org Georgina Yeomans*
Jennifer A. Holmes*
NAACP Legal Defense and Educational Fund, Inc.
700 14th Street NW, 6th Floor
Washington, DC 20005
Telephone: (202) 682-1300

Facsimile: (202) 682-1312 gyeomans@naacpldf.org jholmes@naacpldf.org

Shira Wakschlag The Arc of the United States, Inc. 1825 K Street, NW, Suite 1200 Washington, DC 20006 Telephone: (202) 534-3708

Facsimile: (202) 534-3708 Wakschlag@thearc.org

Counsel for Plaintiffs

^{*}Pro Hac Vice Admission Pending

CERTIFICATE OF SERVICE

I hereby certify that on September 9, 2021, a copy of the foregoing was filed electronically.

Notice of this filing will be served upon all defendants.

/s/ Kenneth E. Broughton

Kenneth E. Broughton Texas Bar No. 03087250 kbroughton@reedsmith.com

Reed Smith LLP 811 Main Street, Suite 1700 Houston, TX 77002-6110 Telephone: (713) 469-3800 Facsimile: (713) 469-3899

Counsel for Plaintiffs