

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
MCALLEN DIVISION

FEDERICO FLORES, JR., et al.,

Plaintiffs,

v.

RUTH R. HUGHS, IN HER OFFICIAL
CAPACITY AS TEXAS SECRETARY
OF STATE, et al.,

Defendants.

§
§
§
§
§
§
§
§
§
§
§

Civil Case No. 7:18-cv-00113

**STARR COUNTY DEMOCRATIC PARTY’S MOTION FOR LEAVE IN SUPPORT OF
MOTION TO INTERVENE**

Intervenors move for leave, respectfully requesting that the Court accept and consider filed reply in support of its motion to intervene, addressing the responses both of Secretary Hughs (Doc. 103) and of the Early Voting Ballot Board (EVBB) Defendants (Doc. 104). The reply was submitted on Saturday May 30, 2020. The response was due Friday May 29, 2020.

Plaintiffs’ counsel intended to file the reply on Friday but unintentionally left her laptop with the document at her office and it was not discovered until later Friday evening. The office is an hour drive from her home. The laptop was recovered on Saturday and the document was filed.

Conclusion

Intervenors respectfully request that this Court grant leave and accept the above-referenced materials as requested.

Respectfully submitted,

/s/Martie Garcia Vela

Martie Garcia Vela
Attorney for Intervenor
Starr County Democratic Party
SBN: 24058898
Law Office of Martie Garcia Vela, PC
509 N. San Antonio
Rio Grande City, Texas 78582
956-488-8170 (phone)
956-488-8129 (fax)
martie.garcia@gmail.com

Certificate of Conference

The undersigned counsel conferred by email on June 1, 2020 with Defense counsel and did not receive a response before the filing of this Motion for Leave.

/s/ Martie G. Vela
Martie G. Vela

Certificate of Service

The undersigned counsel hereby certifies that on May 1, 2020, the foregoing motion, and and proposed order, was served on the Defendants in this matter by means of the court's CM/ECF system.

Mr. Jerad Wayne Najvar
2180 North Loop West, Ste. 255
Houston, TX 77018
Counsel for Plaintiffs

Mr. Michael R. Abrams
PO Box 12548, Capitol Station
Austin, TX 78711
Counsel for Defendant Ruth R. Hughs

Mr. Martin Golando
405 N. Saint Mary's, Suite 700
San Antonio, TX 78205
Counsel for ballot board Defendants

/s/ Jerad Najvar
Jerad Najvar

