



Plaintiff Stringer is an issue in this case bearing on both standing and eligibility for a preliminary injunction. While the Court's Order granting partial injunctive relief to immediately require Defendants to register Mr. Stringer to vote addressed his injury at that time, the additional injury to Mr. Stringer was imminent based on his clearly-stated intention to move to another new address during the pendency of this suit. In their first supplemental filing Plaintiffs attached a declaration of Plaintiff Jarrod Stringer and his accompanying notice of non-renewal of lease, which he submitted to his landlord on June 18, 2020 as confirmation of his previous testimony of his intent to move on or before the end of his current lease, which expires on August 24, 2020. *See* Doc. 91; Excerpts of Apr. 29 Deposition of Jarrod Stringer at 35:6–36:24, Doc. 69-1 at 72-73.

Mr. Stringer's planned move has now come to pass. In accordance with previous representations to the Court, Mr. Stringer is moving on August 15, 2020. *See Exhibit A* at ¶ 1 (Declaration of Jarrod Stringer of Aug. 14, 2020). While his new address will remain in the city of Houston, his new address is located in different electoral districts than his previous address, including a move to U.S. Congressional District 18 from U.S. Congressional District 7. *Id.* at ¶ 2.<sup>1</sup> In order for Mr. Stringer to vote in the correct electoral districts in the November general election, he must submit his change of address or a new voter registration application to election authorities by October 5, 2020, the voter registration deadline. TEX. ELEC. CODE § 13.143. Mr. Stringer also understands that he is required by law to update his driver's license to his new address by September 14, 2020—30 days after his move. *See Exhibit A* at ¶ 4.

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<sup>1</sup> Pursuant to Federal Rule of Evidence 201, Plaintiffs request the Court to take judicial notice of the official United States House of Representatives website used to confirm Plaintiff Stringer's previous and new congressional districts: United States House of Representatives, *Find My Representative*, House.gov (accessed Aug. 13, 2020) <https://www.house.gov/representatives/find-your-representative>.

Accordingly, without immediate injunctive relief, Mr. Stringer will again transact with DPS online to update his address, and again be denied his right to simultaneously update his voter registration—an identical injury to that which the Court enjoined in this case related to Mr. Stringer’s previous address change. Order, Doc. 46 (Jan. 30, 2020). In order to permit Mr. Stringer the ability to (1) comply with the law by timely updating his driver’s license address, (2) timely register to vote in his new districts for the November general election, and (3) exercise his right to a simultaneous voter registration application with his DPS transaction, a preliminary injunction as requested by Plaintiffs must be issued prior to September 14, 2020.

Dated: August 14, 2020

Respectfully submitted,

/s/ Mimi Marziani

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ATTORNEYS FOR PLAINTIFFS

**CERTIFICATE OF SERVICE**

By my signature below, I certify that a true and correct copy of the foregoing has been served on all counsel of record on August 14, 2020 via the Court's CM/ECF system.

/s/ Ryan V. Cox

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

JARROD STRINGER, NAYELI GOMEZ,  
JOHN HARMS, MOVE TEXAS CIVIC FUND,  
and LEAGUE OF WOMEN VOTERS OF TEXAS

Plaintiffs,

v.

RUTH HUGHS, IN HER OFFICIAL  
CAPACITY AS THE TEXAS SECRETARY OF  
STATE and STEVEN C. McCRAW, IN HIS  
OFFICIAL CAPACITY AS THE DIRECTOR OF  
THE TEXAS DEPARTMENT OF PUBLIC  
SAFETY

Defendants.

Civil Action No. 5:20-cv-00046-OLG

**DECLARATION OF JARROD STRINGER**

My name is Jarrod Stringer. I am over the age of 18 and capable of making this declaration. The facts stated herein are within my personal knowledge.

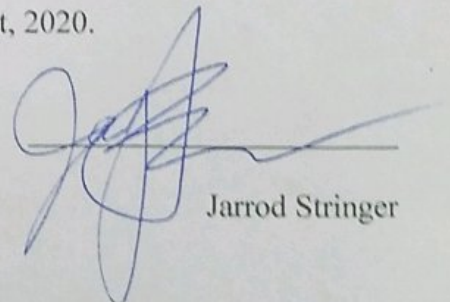
1. In keeping with my previously stated intention to move from my residence at 2401 Lazy Hollow Dr., Houston, TX, 77063, I will be moving on Saturday, August 15, 2020 to a new residence at 5000 Milwee St., Houston, TX 77092.
2. 5000 Milwee St. is in different electoral districts than 2401 Lazy Hollow Dr.. Among those differences, 5000 Milwee St. is located in United States Congressional District 18, whereas 2401 Lazy Hollow Dr. is located in United States Congressional District 7.
3. In order to vote in the correct electoral districts in the November general election, I must submit my change of address by the October 05 registration deadline.



4. By Texas law, I must also change the address on my driver's license to reflect my new residence.
5. Pursuant to my rights under federal law, I wish to have my online driver's license transaction serve as a simultaneous voter registration application. I will change my driver's license online because my personal health, the COVID-19 pandemic, and the unreliability and inconvenience of the postal system make it the only safe and reliable option.
6. I have previously been aggrieved twice by the State's failure to offer simultaneous voter registration applications with online driver's license transactions.
7. In order to exercise my rights under federal law, I will wait to change my driver's license address until I am provided with the required simultaneous application to update my voter registration.
8. As soon as it is possible for my driver's license transaction to serve as a simultaneous voter registration transaction, I will update both my driver's license information and voter registration information online in a single transaction.

This Declaration is made pursuant to 28 U.S.C. § 1746. I declare under penalty of perjury that the foregoing is true and correct.

Executed in Harris County, State of Texas, on 14th day of August, 2020.



Jarrod Stringer