

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

RUSSELL GRANT, <i>et al.</i>	§	
<i>Plaintiffs,</i>	§	
vs.	§	Civil Action No. SA-06-CA-1099-FB
	§	
GONZALES COUNTY,	§	
<i>Defendant.</i>	§	

**JOINT MOTION BY ALL PARTIES FOR
ENTRY OF AGREED FINAL JUDGMENT**

Plaintiffs Grant and Fryer and Defendant Gonzales County hereby jointly move the Court for entry of the Agreed Final Judgment with is filed contemporaneously with this joint motion and show the Court as follows:

1. All remaining parties in this action join in this motion. Mr. Hastings already has been dismissed as a party.

2. The parties have reached agreement on final disposition of this case. If approved by the Court, it will conclude this case by providing for: (i) the County to pay attorney fees and court costs of a specified amount within a specified time frame; and (ii) Plaintiffs Grant and Fryer agreeing to the dismissal with prejudice of their claims. Nothing in this agreement is intended to prevent Plaintiffs Grant and Fryer (or anyone else) from providing the United States Department of Justice their views and positions on the polling place change that gave rise to this suit under Section 5 of the Voting Rights Act of 1965, as amended, 42 U.S.C. § 1973c. Nor is anything in this agreement intended to convey a position by any party or the Court with regard to whether the polling place change that is the subject of this lawsuit should or should not be cleared under applicable

provisions of the Voting Rights Act of 1965, as amended. Instead, this is an agreement only about disposition of this lawsuit.

3. The parties agree that a single judge is authorized to enter relief in this action in the form of the Joint Agreed Final Judgment, without the necessity of convening a three-judge district court.

WHEREFORE, based upon the foregoing matters, the parties jointly move the Court for entry of the Agreed Final Judgment that accompanies this joint motion.

Respectfully submitted,

/s/ **Renea Hicks**

Max Renea Hicks
Attorney at Law
State Bar No. 09580400

101 West 6th Street
Suite 504
Austin, Texas 78701
(512) 480-8231
fax (512) 480-9105
e-mail: rhicks@renea-hicks.com

ATTORNEY FOR PLAINTIFFS GRANT
AND FRYER

/s/ Robert T. "Bob" Bass

Robert T. "Bob" Bass
Attorney at Law
State Bar No. 01880400
ALLISON, BASS & ASSOCIATES, LLP
A.O. Watson House
402 West 12th Street
Austin, Texas 78701
(512) 482-0701
Fax: (512) 480-0902
E-Mail: r.bass@allison-bass.com

ATTORNEY FOR DEFENDANT
GONZALES COUNTY, TEXAS