

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION

STATE OF TEXAS and  
THE HERITAGE FOUNDATION,

*Plaintiffs,*

v.

EQUAL EMPLOYMENT OPPORTUNITY  
COMMISSION; CHARLOTTE A.  
BURROWS, in her official capacity as Chairman  
of the Equal Employment Opportunity  
Commission; MERRICK B. GARLAND, in his  
official capacity as Attorney General of the  
United States,

*Defendants.*

CIVIL ACTION NO. 2:24-cv-173-Z

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**PLAINTIFFS' MOTION FOR SUMMARY JUDGMENT**

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Plaintiffs State of Texas and the Heritage Foundation move this Court for an order granting them Summary Judgment on Counts 1–4 of their Complaint (ECF No. 1), pursuant to Rule 56 of the Federal Rules of Civil Procedure and Local Rule 56.3. This motion is supported by Plaintiffs' Memorandum in Support of their Motion for Summary Judgment, which sets forth the argument and authorities on which Plaintiffs rely and contains the matters required by Local Rule 56.3.

Dated: October 23, 2024

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Respectfully submitted.

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### CERTIFICATE OF SERVICE

I hereby certify that on October 23, 2024, a true and correct copy of the above and foregoing document has been filed and served, *via* the CM/ECF system, to all counsel and parties of record.

/s/Ryan D. Walters  
RYAN D. WALTERS