

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

THE STATE OF TEXAS

Plaintiff,

vs.

JACQUELYN CALLANEN in her official capacity as Bexar County Election Administrator; PETER SAKAI, in his official capacity as Bexar County Judge; REBECA CLAY-FLORES, in her official capacity as Bexar County Commissioner; JUSTIN RODRIGUEZ, in his official capacity as Bexar County Commissioner; GRANT MOODY, in his official capacity as Bexar County Commissioner; TOMMY CALVERT, in his official capacity as Bexar County Commissioner.

Defendants.

Case No. 5:24-cv-1043-OLG

**DEFENDANTS’ ADVISORY TO THE COURT REGARDING COMPLETION OF CONTRACT AT ISSUE**

TO THE HONORABLE UNITED STATES DISTRICT JUDGE ORLANDO L. GARCIA:

As discussed in the Defendants’ amended notice of removal, Plaintiff, the State of Texas, seeks injunctive relief prohibiting Bexar County (although Bexar County is not a named party in this lawsuit) from making contractual payment to Civic Government Solutions (“CGS”; also not a party) for the printing and mailing of voter registration applications. *See* docket no. 6 at 2. Defendants received notice that, earlier this week, Bexar County issued all payment owed to CGS under the contract at issue. Accordingly, Defendants believe that all of Plaintiff’s claims for injunctive relief have been rendered moot.

The Court likely is working to rule on Plaintiff's motion to remand. That motion presents important constitutional legal issues, and, given that there will be no more performance of the contract between Bexar County and CGS, it would seem that the Court could take its normal time to deliberate and rule on the motion to remand.

In sum, the only events that Plaintiff seeks to enjoin already have occurred. In a similar lawsuit brought by the State of Texas currently before the Honorable United States District Judge Robert Pitman, Defendants Travis County Commissioners and the Travis County Voter Registrar filed a notice very similar to this one. *See* Exhibit A hereto. In response, Judge Pitman issued an order requiring Plaintiff to file a notice "indicating its current position on the claims it brings in this action." *See* Exhibit B hereto. Defendants file this advisory in the interest of assisting the Court to manage its docket efficiently.

Respectfully Submitted,

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By: */s/ Larry L. Roberson*

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**CERTIFICATE OF SERVICE**

I do hereby certify that the foregoing document was served upon the following counsel for the State of Texas through the CM/ECF system on September 27, 2024:

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