



that the State of Texas adopted Plan S148, not Plan S172, following the 2010 Federal Census. Defendant-Intervenors deny the allegations in the third sentence of paragraph 2.

3. The allegation in sentence one of paragraph 3 is insufficiently specific to allow Defendant-Intervenors to admit or deny it so, accordingly, it is denied. Defendant-Intervenors admit that Members of the Texas Senate are elected to their posts by a majority of votes cast in each election for Texas Senate. Defendant-Intervenors deny the allegations in the second and third sentences of paragraph 3.
4. Defendant-Intervenors are without sufficient information to admit or deny the allegations in the first sentence of paragraph 4. Defendant-Intervenors deny all remaining allegations in paragraph 4.
5. Defendant-Intervenors deny the allegations in the first sentence of paragraph 5. Defendant-Intervenors admit the accuracy of the quote in the second sentence of paragraph 5 but deny all other allegations. Defendant-Intervenors deny the allegations in the third and fourth sentences of paragraph 5.
6. Defendant-Intervenors are without sufficient information to admit or deny the allegations in paragraph 6.
7. Defendant-Intervenors are without sufficient information to admit or deny the allegations in paragraph 7.
8. Defendants-Intervenors admit the allegations in paragraph 8, except that Governor Rick Perry did not sign Plan S172 into law. He did sign Senate Bill 2, which included Plan S172, into law on June 26, 2013.

9. Defendant-Intervenors admit the allegations in the first sentence of paragraph 9.  
Defendant-Intervenors deny the allegations in the second sentence of paragraph 9.  
Defendant-Intervenors admit the allegations in the third sentence of paragraph 9.
10. Defendant-Intervenors admit that Plaintiffs filed this case under the United States Constitution and that the quoted statutory provisions are jurisdictional authority for such cases but deny the remaining allegations in paragraph 10.
11. Defendant-Intervenors admit that the quoted statutory provisions establish venue for this case if the remaining allegations in paragraph 11 are true. Defendant-Intervenors are without sufficient information to admit or deny the remaining allegations in paragraph 11.
12. Defendant-Intervenors admit that valid cases challenging the constitutionality of a state apportionment are appropriately brought before a three-judge panel under the quoted statutory provisions in paragraph 12.
13. Defendant-Intervenors admit that the equal protection clause of the Fourteenth Amendment states, in part, the quoted provision in the first sentence of paragraph 13. The remaining allegations in paragraph 13 are legal conclusions and do not require Defendant-Intervenors to admit or deny the allegations. To the extent those allegations do require an answer, they are denied.
14. The allegations in paragraph 14 are legal conclusions and do not require Defendant-Intervenors to admit or deny the allegations. To the extent those allegations do require an answer, they are denied.

15. The allegations in paragraph 15 are legal conclusions and do not require Defendant-Intervenors to admit or deny the allegations. To the extent those allegations do require an answer, they are denied.
16. Defendant-Intervenors admit the allegations in the first sentence of paragraph 16. The remaining allegations in paragraph 16 are legal conclusions and do not require Defendant-Intervenors to admit or deny the allegations. To the extent those allegations do require an answer, they are denied.
17. Defendant-Intervenors admit the allegations in paragraph 17.
18. The allegations in paragraph 18 are without sufficient specificity to allow Defendant-Intervenors to admit or deny the allegations.
19. Defendant-Intervenors admit the allegations in the first sentence of paragraph 19. The remaining allegations in paragraph 19 are legal conclusions and do not require Defendant-Intervenors to admit or deny the allegations. To the extent those allegations do require an answer, they are denied.
20. Defendant-Intervenors admit that the partial quotes in the allegations in the first and second sentences of paragraph 20 are accurate as described in Attorney General Opinion MW-350 (1981). Defendant-Intervenors deny the allegations in the third sentence of paragraph 20 and admit the allegations in the fourth sentence.
21. Defendant-Intervenors are without sufficient information to admit or deny the allegations in paragraph 21.
22. Defendant-Intervenors deny the allegations in paragraph 22.
23. Defendant-Intervenors admit the allegations in the first sentence of paragraph 23. Defendant-Intervenors deny the allegations in the second sentence of paragraph 23.

Defendant-Intervenors admit that H.B. 150 included state house redistricting plans but deny that H.B. 150 included congressional or state senate redistricting plans. Defendant-Intervenors admit the allegations in the third sentence of paragraph 23.

24. Defendant-Intervenors deny the allegations in the first sentence of paragraph 24. Defendant-Intervenors admit that Plan S148 was challenged in federal court. Defendant-Intervenors admit the allegations in the second and third sentences of paragraph 24. Defendant-Intervenors admit that the three-judge court created Plan S172 as an interim plan for the 2012 elections to remedy the perceived problem with Senate District 10 in Plan S148 but deny that only the three contiguous districts were adjusted and that Plan S148 was otherwise sustained.
25. Defendant-Intervenors admit the allegations in paragraph 25.
26. Defendant-Intervenors deny the allegations in the first sentence of paragraph 26. The second and third sentences of paragraph 26 are statements regarding attachments to the complaint and do not require Defendant-Intervenors to admit or deny the allegations.
27. Defendant-Intervenors deny the allegations in paragraph 27.
28. Defendant-Intervenors deny the allegations in paragraph 28.
29. Defendant-Intervenors are without sufficient information to admit or deny the allegations in paragraph 29.
30. Defendant-Intervenors are without sufficient information to admit or deny the allegations in paragraph 30.
31. Defendant-Intervenors deny the allegations in paragraph 31.
32. Defendant-Intervenors deny the allegations in paragraph 32.

33. The allegations in the first sentence in paragraph 33 are legal conclusions and do not require Defendant-Intervenors to admit or deny the allegations. To the extent those allegations do require an answer, they are denied. The allegations in the second sentence in paragraph 33 are denied.
34. Defendant-Intervenors are without sufficient information to admit or deny the allegations in the first sentence of paragraph 34. Defendant-Intervenors deny the remaining allegations in paragraph 34.
35. The allegations in paragraph 35 are legal conclusions and do not require Defendant-Intervenors to admit or deny the allegations. To the extent those allegations do require an answer, they are denied.
36. The allegations in paragraph 36 merely incorporate by reference the aforementioned paragraphs and do not require an admission or denial.
37. Defendant-Intervenors admit the allegation in paragraph 37.
38. Defendant-Intervenors deny the allegations in paragraph 38.
39. Defendant-Intervenors deny the allegations in paragraph 39.
40. Defendant-Intervenors deny the allegations in paragraph 40.
41. Defendant-Intervenors deny the allegations in paragraph 41.
42. Defendant-Intervenors deny the allegations in paragraph 42.
43. Defendant-Intervenors deny the allegations in paragraph 43.
44. Defendant-Intervenors deny that the plaintiffs are entitled to the relief set out on page 13 of the Original Complaint.
45. Defendant-Intervenors deny all other allegations in the Original Complaint not specifically admitted.

DATED: June 30, 2014

Respectfully submitted,

MEXICAN AMERICAN LEGAL DEFENSE  
AND EDUCATIONAL FUND

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**CERTIFICATE OF SERVICE**

I hereby certify that on the 30<sup>th</sup> day of June, 2014, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system which will send notification of such filing to the following:

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