

No. 25-11055

**United States Court of Appeals
for the Fifth Circuit**

Winnie Jackson, *et al.*,
Plaintiffs-Appellants,

v.

Tarrant County, Texas, *et al.*,
Defendants-Appellees.

On appeal from the United States District Court
for the Northern District of Texas
USDC 4:25-CV-00587-O

**PLAINTIFFS-APPELLANTS' MOTION FOR EXPEDITED BRIEFING
AND DECISION**

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CERTIFICATE OF INTERESTED PERSONS

The undersigned counsel of record certifies that the following listed persons and entities as described in the fourth sentence of 5th Circuit Rule 28.2.1 have an interest in the outcome of this case. These representations are made in order that the judges of this Court may evaluate possible disqualifications or recusal.

<p><u>Appellants</u></p> <p>Winnie Jackson Jarrett “Jay” Jackson Celina Vasquez Duane Braxton Nadia Bhular Amjad Bhular Cheryl Mills-Smith Richard Canada</p>	<p><u>Counsel for Appellants</u></p> <p>Chad W. Dunn George (Tex) Quesada Sean J. McCaffity Jesse Gaines Mark P. Gaber</p>
<p><u>Appellees</u></p> <p>Tarrant County, Texas Tarrant County Commissioners Court Tim O’Hare, in his official capacity as Tarrant County Judge</p>	<p><u>Counsel for Appellees</u></p> <p>Joseph M. Nixon Stephen Andrew Lund Katherine Elizabeth Owens Omar Jose Famada John Christian Adams Kaylan Phillips</p>

/s/ Chad W. Dunn

MOTION FOR EXPEDITED BRIEFING AND DECISION

Plaintiffs-Appellants respectfully request that the Court expedite the briefing, argument, and decision in this case. Plaintiffs moved for a preliminary injunction in the district court, Chief Judge Reed O'Connor presiding, challenging the constitutionality of Tarrant County's mid-decade redistricting of its commissioner precincts. Plaintiffs alleged, *inter alia*, that the map unconstitutionally deprives roughly 150,000 Tarrant County voters—disproportionately Black and Latino—of the right to vote in the 2026 commissioner election on account of race and political viewpoint. These voters were otherwise eligible to cast a ballot for commissioner in 2026 but will no longer be because of the new map. That is, they will be forced to wait six, rather than four, years before next voting for a commissioner.

Plaintiffs requested a ruling from the district court by Friday, September 12, 2025, and the district court denied Plaintiffs' motion for a preliminary injunction around midnight that evening. Plaintiffs filed their notice of appeal on Monday, September 15, 2025, and now respectfully move for an expedited briefing schedule and decision from this Court. Candidate filing for the 2026 election begins on November 8, 2025. To ensure that Plaintiffs can obtain appellate review (including any request for relief from the Supreme Court) prior to the candidate filing period, Plaintiffs respectfully request expedited briefing, argument, and decision according to the following schedule:

Appellants' Brief: September 29, 2025
Appellees' Brief: October 10, 2025
Appellants' Reply Brief: October 15, 2025
Oral Argument: Week of October 20, 2025
Requested Decision: October 31, 2025

Plaintiffs conferred with counsel for Defendants, who oppose this motion, citing other commitments and a belief that the district court's opinion suggests Plaintiffs are unlikely to prevail on appeal.

Plaintiffs respectfully request that the Court expedite any briefing on this expedition motion, to the extent the Court awaits a response before ordering a briefing schedule.

CONCLUSION

For the foregoing reasons, the motion should be granted.

Dated: September 18, 2025

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Respectfully submitted,

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**CERTIFICATE OF COMPLIANCE WITH TYPE-VOLUME LIMIT,
TYPEFACE REQUIREMENTS, AND TYPE-STYLE REQUIREMENTS**

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/s/ Chad W. Dunn

CERTIFICATE OF SERVICE

I hereby certify that on September 18, 2025, this document was electronically served on all counsel of record via the Court's CM/ECF system.

/s/ Chad W. Dunn