IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION

TERRY PETTEWAY, THE HONORABLE DERRECK ROSE, MICHAEL MONTEZ, SONNY JAMES and PENNY POPE,	§	
Plaintiffs,	§	Civil Action No. 3:22-cv-57
	§	[Lead Consolidated Case]
v.	§	
GALVESTON, TEXAS, and HONORABLE MARK HENRY, in his official capacity as Galveston County Judge,	§	
Defendants.	§	

CONSENT MOTION TO SUBSTITUTE PARTY

Plaintiffs Terry Petteway, Derreck Rose, and Penny Pope ("Petteway Plaintiffs") respectfully request that this Court substitute Derreck Rose with Derrick Rose as a party in this litigation. Currently, Mr. Rose's name is incorrectly spelled "Derrick Rose" on this Court's case management system. Petteway Plaintiffs respectfully request that this Court substitute "Derrick Rose" with Mr. Rose's correctly spelled name, "Derreck Rose." Plaintiffs have conferred with all parties who consent to this Motion.

Respectfully submitted this 7th day of March, 2024.

/s/ Valencia Richardson
Mark P. Gaber*
Simone Leeper*

D }‰‰ Œ› u‰]Pvo P o vš ŒX}ŒPEV D Ì U šZ Œ]v ~ Zd• D šZ Œ]v X
^µ i šWWšš Á Ç ÀX ' oÀ •š}v }µvšÇ r D}š]}v š} ^µ •š]šµš

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

All,

Petteway Plaintiffs intend to file the attached motion to substitute in order to correct the spelling of Derreck Rose's name on the case management system. Please let us know whether the parties consent to this motion.

Best,
Valencia

Valencia Richardson (she/her)
Legal Counsel, Voting Rights

318.573.8984 | 202.266.2574

Campaign Legal Center
1101 14th St. NW, Suite 400
Washington, DC 20005
campaignlegalcenter.org

Facebook | X/Twitter | Instagram | LinkedIn
Check out CLC's podcast: Democracy Decoded

Valencia Richardson

From: Meza, Catherine (CRT) <Catherine.Meza@usdoj.gov>
Sent: Thursday, March 7, 2024 12:34 PM
To: Hilary Harris Klein; Valencia Richardson; Joe Nixon; Stewart, Michael (CRT); Angela Olalde; Chad Dunn; Kathy Cox; Adrianne Spoto; Jennifer Jimenez; schen@texascivilrightsproject.org; Joseph Russo; Jordan Raschke Elton; Jayaraman, Tharuni (CRT); bernadette@uclavrp.org; KGarrett@willkie.com; Gear, Bruce (CRT); hani@texascivilrightsproject.org; joaquin@texascivilrightsproject.org; RMancino@willkie.com; Mark Gaber; neil@ngbaronlaw.com; Newkirk, Zachary (CRT); nas@naslegal.com; MPolizzano@willkie.com; ASilberstein@willkie.com; Simone Leeper; sonni@uclavrp.org; JSuriani@willkie.com; DVall-llobera@willkie.com; Wake, Brittany (CRT); Zachary@texascivilrightsproject.org; MZhu@willkie.com; Smith, K'Shaani (CRT); Berman, Robert (CRT); Gwen Kelly; Christina Beeler; Maureen Riordan; a@electionlawcenter.com; Shawn Sheehy; Sharon Norwood; Dallin Holt; Alexandra Copper
Subject: RE: [External]Petteway v. Galveston County - Motion to Substitute

The United States consents to this motion.

From: Hilary Harris Klein <hilaryhklein@scsj.org>
Sent: Thursday, March 7, 2024 12:22 PM
To: Valencia Richardson <VRichardson@campaignlegalcenter.org>; Joe Nixon <JNixon@publicInterestLegal.org>; Stewart, Michael (CRT) <Michael.Stewart3@usdoj.gov>; Angela Olalde <aolalde@greerherz.com>; Chad Dunn <chad@brazilanddunn.com>; Kathy Cox <Kcox@greerherz.com>; Adrianne Spoto <Adrianne@scsj.org>; Jennifer Jimenez <JJimenez@greerherz.com>; schen@texascivilrightsproject.org; Joseph Russo <JRusso@greerherz.com>; Jordan Raschke Elton <jraschkeelton@greerherz.com>; Jayaraman, Tharuni (CRT) <Tharuni.Jayaraman@usdoj.gov>; bernadette@uclavrp.org; KGarrett@willkie.com; Gear, Bruce (CRT) <Bruce.Gear@usdoj.gov>; hani@texascivilrightsproject.org; joaquin@texascivilrightsproject.org; RMancino@willkie.com; Mark Gaber <MGaber@campaignlegalcenter.org>; neil@ngbaronlaw.com; Newkirk, Zachary (CRT) <Zachary.Newkirk@usdoj.gov>; nas@naslegal.com; MPolizzano@willkie.com; ASilberstein@willkie.com; Simone Leeper <SLeeper@campaignlegalcenter.org>; sonni@uclavrp.org; JSuriani@willkie.com; DVall-llobera@willkie.com; Wake, Brittany (CRT) <Brittany.Wake@usdoj.gov>; Zachary@texascivilrightsproject.org; MZhu@willkie.com; Smith, K'Shaani (CRT) <K'Shaani.Smith@usdoj.gov>; Berman, Robert (CRT) <Robert.Berman@usdoj.gov>; Gwen Kelly <gwen@brazilanddunn.com>; Christina Beeler <christinab@texascivilrightsproject.org>; Maureen Riordan <MRiordan@publicInterestLegal.org>; a@electionlawcenter.com; Shawn Sheehy <ssheehy@holtzmanvogel.com>; Sharon Norwood <snorwood@holtzmanvogel.com>; Dallin Holt <dholt@holtzmanvogel.com>; Alexandra Copper <ACopper@campaignlegalcenter.org>; Meza, Catherine (CRT) <Catherine.Meza@usdoj.gov>
Subject: RE: [External]Petteway v. Galveston County - Motion to Substitute

NAACP/LULAC Plaintiffs consent.

Hilary Harris Klein
Pronouns: She, Her, Hers

Senior Counsel for Voting Rights
Southern Coalition for Social Justice
P.O. Box 51280, Durham, NC 27717
hilaryhklein@scsj.org
scsj.org | @scsj | FB: @southerncoalition

(Admitted in NC and NY)

CONFIDENTIAL & PRIVILEGED

This communication is intended solely for the addressee. Any unauthorized review, use, disclosure or distribution is prohibited. If you believe this message has been sent to you in error, please notify the sender by replying to this transmission and delete the message without disclosing it. Thank you.

From: Valencia Richardson <VRichardson@campaignlegalcenter.org>
Sent: Thursday, March 7, 2024 12:19 PM
To: Hilary Harris Klein <hilaryhklein@scsj.org>; Joe Nixon <JNixon@publicInterestLegal.org>; Stewart, Michael (CRT) <Michael.Stewart3@usdoj.gov>; Angela Olalde <aolalde@greerherz.com>; Chad Dunn <chad@brazilanddunn.com>; Kathy Cox <Kcox@greerherz.com>; Adrianne Spoto <Adrianne@scsj.org>; Jennifer Jimenez <JJimenez@greerherz.com>; schen@texascivilrightsproject.org; Joseph Russo <JRusso@greerherz.com>; Jordan Raschke Elton <jraschkeelton@greerherz.com>; Jayaraman, Tharuni (CRT) <Tharuni.Jayaraman@usdoj.gov>; bernadette@uclavrp.org; KGarrett@willkie.com; Gear, Bruce (CRT) <Bruce.Gear@usdoj.gov>; hani@texascivilrightsproject.org; joaquin@texascivilrightsproject.org; RMancino@willkie.com; Mark Gaber <MGaber@campaignlegalcenter.org>; neil@ngbaronlaw.com; Newkirk, Zachary (CRT) <Zachary.Newkirk@usdoj.gov>; nas@naslegal.com; MPolizzano@willkie.com; ASilberstein@willkie.com; Simone Leeper <SLeeper@campaignlegalcenter.org>; sonni@uclavrp.org; JSuriani@willkie.com; DVall-llobera@willkie.com; Wake, Brittany (CRT) <Brittany.Wake@usdoj.gov>; Zachary@texascivilrightsproject.org; MZhu@willkie.com; Smith, K'Shaani (CRT) <K'Shaani.Smith@usdoj.gov>; Berman, Robert (CRT) <Robert.Berman@usdoj.gov>; Gwen Kelly <gwen@brazilanddunn.com>; Christina Beeler <christinab@texascivilrightsproject.org>; Maureen Riordan <MRiordan@publicInterestLegal.org>; a@electionlawcenter.com; Shawn Sheehy <ssheehy@holtzmanvogel.com>; Sharon Norwood <snorwood@holtzmanvogel.com>; Dallin Holt <dholt@holtzmanvogel.com>; Alexandra Copper <ACopper@campaignlegalcenter.org>; Meza, Catherine (CRT) <Catherine.Meza@usdoj.gov>
Subject: [External]Petteway v. Galveston County - Motion to Substitute

All,

Petteway Plaintiffs intend to file the attached motion to substitute in order to correct the spelling of Derreck Rose's name on the case management system. Please let us know whether the parties consent to this motion.

Best,
Valencia

Valencia Richardson (she/her)
Legal Counsel, Voting Rights

318.573.8984 | 202.266.2574

Campaign Legal Center
1101 14th St. NW, Suite 400
Washington, DC 20005
campaignlegalcenter.org

Facebook | X/Twitter | Instagram | LinkedIn
Check out CLC's podcast: Democracy Decoded