- 6. My office is located at 208 Texas Highway 37, Mount Vernon, Texas 75457. It is open Tuesday through Thursday, from 8:00 am to 4:00 pm.
- 7. Between the dates of June 25, 2013, to the present, my office received a total of zero complete EIC applications.
- 8. Between the dates of June 25, 2013, to the present, my office received a total of zero incomplete or otherwise incorrect EIC applications.
- 9. The Franklin County Sheriff's office is under no obligation to continue accepting applications for EICs.
- 10. The Franklin County Sheriff's office does not currently have any plans to change its location or hours of operation prior to the November 4, 2014, general election.

Executed on this the 4 day of May 2014.

Ricky Jones

MARC VEASEY, et al.,

Plaintiffs,

٧.

RICK PERRY, et al.,

Defendants.

UNITED STATES OF AMERICA,

Plaintiff,

TEXAS LEAGUE OF YOUNG VOTERS EDUCATION FUND, et al.,

Plaintiff-Intervenors,

TEXAS ASSOCIATION OF HISPANIC COUNTY JUDGES AND COUNTY COMMISSIONERS, et al.,

Plaintiff-Intervenors,

٧.

STATE OF TEXAS, et al.,

Defendants.

Civil Action No. 2:13-cv-193 (NGR)

Plaintiffs,

V

NANDITA BERRY, et al.,

Defendants.

BELINDA ORTIZ, et al.,

Plaintiffs,

V.

STATE OF TEXAS, et al.,

Defendants

Civil Action No. 2:13-cv-291 (NGR)

Civil Action No. 2:13-cv-348 (NGR)

### DECLARATION OF CARLOS SEGURA

- 1, Carlos Segura, pursuant to 28 U.S.C. § 1746, hereby declare as follows:
- I make this declaration based on personal knowledge and am competent to do so. If
  called as a witness and placed under oath, I could and would testify thereto.
- I am a resident of Frio County, Texas.
- I am employed by Frio County, where I serve as the Elections Administrator.
- 4. The Frio County Tax Assessor-Collector's office, located at 500 East San Antonio Street, Pearsall, Texas 78061, has received permission from the Texas Department of Public Safety ("DPS") to accept and process Election Identification Certificate applications ("EICs") completed by county residents.

- Cindy McCullough and Delia Mendez, two employees of the Frio County Tax Assessor-Collector's office, received training from DPS to accept and process ElC applications.
- 6. As of May 5, 2014, the Frio County Tax Assessor-Collector's office never established any dates or times when EIC applications would be made available. The office never published notices to county residents informing them of the availability of EIC applications.
- 7. No EIC applications have been issued from or received by the Frio County Tax Assessor-Collector's office.
- 8. Based on publicly available information, including discussions in Frio County

  Commissioners' Court, I am aware that DPS is considering opening a permanent driver

  license office in the county at 500 East San Antonio, Trailer No. 2, Pearsall, Texas

  78061. As of May 5, 2014, DPS has not provided me with the proposed date the office is scheduled to open.

Executed on this the 15th day of May 2014.

Carlos Segura

MARC VEASEY, et al.,

Plaintiffs,

٧.

RICK PERRY, et al.,

Defendants.

UNITED STATES OF AMERICA,

Plaintiff,

TEXAS LEAGUE OF YOUNG VOTERS EDUCATION FUND, et al.,

Plaintiff-Intervenors,

TEXAS ASSOCIATION OF HISPANIC COUNTY JUDGES AND COUNTY COMMISSIONERS, et al.,

Plaintiff-Intervenors,

٧.

STATE OF TEXAS, et al.,

Defendants.

Civil Action No. 2:13-cv-193 (NGR)

Plaintiffs,

٧.

NANDITA BERRY, et al.,

Defendants.

BELINDA ORTIZ, et al.,

Plaintiffs,

٧.

STATE OF TEXAS, et al.,

Defendants

Civil Action No. 2:13-cv-291 (NGR)

Civil Action No. 2:13-cv-348 (NGR)

#### DECLARATION OF MICHELLE GARCIA

- I, Michelle Garcia, pursuant to 28 U.S.C. § 1746, hereby declare as follows:
- I make this declaration based on personal knowledge and am competent to do so. If called as a witness and placed under oath, I could and would testify thereto.
- 2. I am a resident of Goliad County, Texas.
- I am employed by Goliad County, where I serve as the Tax Assessor-Collector. As part
  of my responsibilities, I accept and process applications for election identification
  certificates ("EICs") received by the Goliad County Tax Assessor-Collector's office.
- My office currently accepts applications for EICs. Applicants must appear in person to submit their application.
- 5. Goliad County does not have an operational driver license office.

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My office is located at 329 W. Franklin Street, Goliad, Texas 77963. It is open Monday 6.

through Friday, from 8:00 am to 5:00 pm.

Between the dates of June 25, 2013, to the present, my office received a total of zero ONE 7.

complete EIC applications.

Between the dates of June 25, 2013, to the present, my office received a total of zero 8.

incomplete or otherwise incorrect EIC applications.

9. The Goliad County Tax Assessor-Collector's office is under no obligation to continue

accepting applications for EICs.

10. The Goliad County Tax Assessor-Collector's office does not currently have plans to

change its location or hours of operation prior to the November 4, 2014, general election.

I declare under penalty of perjury that the foregoing is true and correct to the best of my

knowledge, information, and belief.

Executed on this the  $\underline{\mathcal{G}}$  day of  $\underline{\mathbf{May}}$  2014.

Michelle Garcia

MARC VEASEY, et al.,

Plaintiffs,

v.

RICK PERRY, et al.,

Defendants.

UNITED STATES OF AMERICA,

Plaintiff,

TEXAS LEAGUE OF YOUNG VOTERS EDUCATION FUND, et al.,

Plaintiff-Intervenors,

TEXAS ASSOCIATION OF HISPANIC COUNTY JUDGES AND COUNTY COMMISSIONERS, et al.,

Plaintiff-Intervenors.

V.

STATE OF TEXAS, et al.,

Defendants.

Civil Action No. 2:13-cv-193 (NGR)

Plaintiffs,

V

NANDITA BERRY, et al.,

Defendants.

BELINDA ORTIZ, et al.,

Plaintiffs,

V.

STATE OF TEXAS, et al.,

Defendants

Civil Action No. 2:13-cv-291 (NGR)

Civil Action No. 2:13-cv-348 (NGR)

#### DECLARATION OF REBECCA DUFF

- I, Rebecca Duff, pursuant to 28 U.S.C. § 1746, hereby declare as follows:
- I make this declaration based on personal knowledge and am competent to do so. If called as a witness and placed under oath, I could and would testify thereto.
- I am a resident of Grimes County, Texas.
- I am employed by Grimes County, where I serve as the Voter Registrar and Elections Administrator. As part of my responsibilities, I accept and process applications for election identification certificates ("EIC") received by the Grimes County Elections office.
- My office accepts applications for EICs. Applicants must appear in person to submit their application.

- Grimes County does not currently have an operational driver license office.
- My office is located at 100 Main Street, Anderson, Texas 77830. It is open Monday through Friday, from 8:00 am to 4:30 pm.
  - Between the dates of June 25, 2013, to the present, my office received a total of three complete EIC applications.
  - Between the dates of June 25, 2013, to the present, my office received a total of zero incomplete or otherwise incorrect EIC applications.
  - 9. To the best of my knowledge, the Grimes County Elections Office does not have any plans to change its location or hours of operation prior to the November 4, 2014, general election.

Executed on this the 28 day of April 2014.

S COUNTRIE

Rebecca Duff

## CaseC2xxx65x1-70Q19304D4x00b1CentD407Q4xheFitlE7d-in TFX16D 06/D8/13/11PagFeagle 5D26f 133

IN THE UNITED STATES DISTRICT COURT FOR THE SOUTHERN DISTRICT OF TEXAS CORPUS CHRISTI DIVISION

MARC VEASEY, et al.,

Plaintiffs,

RICK PERRY, et al.,

٧.

Defendants.

UNITED STATES OF AMERICA,

Plaintiff,

TEXAS LEAGUE OF YOUNG VOTERS EDUCATION FUND, et al.,

Plaintiff-Intervenors,

TEXAS ASSOCIATION OF HISPANIC COUNTY JUDGES AND COUNTY COMMISSIONERS, et al.,

Plaintiff-Intervenors,

STATE OF TEXAS, et al.,

٧.

Defendants.

Civil Action No. 2:13-cv-193 (NGR)

Plaintiffs,

Civil Action No. 2:13-cv-291 (NQR)

NANDITA BERRY, et al.,

٧.

Defendants.

BELINDA ORTIZ, et al.,

Plaintiffs,

STATE OF TEXAS, et al.,

٧.

Defendants

Civil Action No. 2:13-cv-348 (NGR)

#### **DECLARATION OF TERESA ALTMAN**

- I, Teresa Altman, pursuant to 28 U.S.C. § 1746, hereby declare as follows:
- I make this declaration based on personal knowledge and am competent to do so. If 1. called as a witness and placed under oath, I could and would testify thereto.
- 2. I am a resident of Hall County, Texas.
- I am employed by Hall County, where I serve as the Tax Assessor-Collector. As part of 3. my responsibilities. I accept and process applications for election identification certificates ("EICs") received by the Hall County Tax Assessor-Collector's office.
- 4. I was appointed Tax Assessor-Collector on January 1, 2014.
- I have no knowledge of Hall County's practices related to EICs prior to January 1, 2014. 5.

- 6. My office first became available to accept and process EIC applications sometime before January 1, 2014, but I do not know the specific date. My office possessed equipment necessary to accept and process EIC applications at the time of my appointment.
- I received training from the Texas Department of Public Safety regarding how to accept and process EIC applications on February 12, 2014.
- 8. My office currently accepts applications for EICs. Applicants must appear in person to submit their application.
- 9. Hall County does not have an operational driver license office.
- 10. My office is located at 512 W. Main Street, Suite 5, Memphis, Texas 79245. It is open Monday through Friday, from 8:30 am to noon, and from 1:00 pm to 5:00 pm.
- Between the dates of January 1, 2014, to the present, my office received a total of zero complete EIC applications.
- 12. Between the dates of January 1, 2014, to the present, my office received a total of zero incomplete or otherwise incorrect EIC applications.
- 13. The Hall County Tax Assessor-Collector's office does not currently have plans to change its location or hours of operation prior to the November 4, 2014, general election.

Executed on this the 15 day of May 2014.

Teresa Altman

resa altrian

MARC VEASEY, et al.,

Plaintiffs,

V

RICK PERRY. et al.,

Defendants.

UNITED STATES OF AMERICA,

Plaintiff,

TEXAS LEAGUE OF YOUNG VOTERS EDUCATION FUND, et al.,

Plaintiff-Intervenors.

TEXAS ASSOCIATION OF HISPANIC COUNTY JUDGES AND COUNTY COMMISSIONERS, et al.,

Plaintiff-Intervenors,

V.

STATE OF TEXAS, et al.,

Defendants.

Civil Action No. 2:13-cv-193 (NGR)

Plaintiffs,

٧.

NANDITA BERRY, et al.,

Defendants.

BELINDA ORTIZ, et al.,

Plaintiffs.

v.

STATE OF TEXAS, et al.,

Defendants

Civil Action No. 2:13-cv-291 (NGR)

Civil Action No. 2:13-cv-348 (NGR)

#### DECLARATION OF LINDA CUMMINGS

- I, Linda Cummings, pursuant to 28 U.S.C. § 1746, hereby declare as follows:
- I make this declaration based on personal knowledge and am competent to do so. If
  called as a witness and placed under oath, I could and would testify thereto.
- I am a resident of Hansford County, Texas.
- I am employed by Hansford County, where I serve as the Tax Assessor-Collector. As
  part of my responsibilities, I accept and process applications for election identification
  certificates ("EICs") received by the Hansford County Tax Assessor-Collector's office.
- My office accepts applications for EICs. Applicants must appear in person to submit their application.
- 5. Hansford County does not currently have an operational driver license office.

- My office is located at 14 Northwest Court, Spearman, Texas 79081. It is open Monday through Friday, from 8:00 am to 4:45 pm; the office receives EIC applications between 8:00 am and noon.
- Between the dates of June 25, 2013, to the present, my office received a total of zero complete EIC applications.
- Between the dates of June 25, 2013, to the present, my office received a total of eight incomplete or otherwise incorrect EIC applications.
- To the best of my knowledge, the Hansford County Tax Assessor-Collector's office does not have any plans to change its location or hours of operation prior to the November 4.
   2014, general election.

Executed on this the 29 day of April 2014.

Linda Cummings

MARC VEASBY, et al.

Plaintiffs,

٧.

RICK PERRY, et al.,

Defendants.

UNITED STATES OF AMERICA,

Plaintiff.

TEXAS LEAGUE OF YOUNG VOTERS EDUCATION FUND, et al.,

Plaintiff-Intervenors,

TEXAS ASSOCIATION OF HISPANIC COUNTY JUDGES AND COUNTY COMMISSIONERS, et al.,

Plaintiff-Intervenors,

V.

STATE OF TEXAS, et al.,

Defendants.

Civil Action No. 2:13-cv-193 (NGR)

Plaintiffs,

٧.

NANDITA BERRY, et al.,

Defendants.

BELINDA ORTIZ, et al.,

Plaintiffs,

v.

STATE OF TEXAS, et al.,

Defendants

Civil Action No. 2:13-cv-291 (NGR)

Civil Action No. 2:13-cv-348 (NGR)

# DECLARATION OF JOYCE GRAY

I, Joyce Gray, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

- I make this declaration based on personal knowledge and am competent to do so. If called as a witness and placed under oath, I could and would testify thereto.
- 2. I am a resident of Irion County, Texas.
- 3. I am employed by Irion County, where I serve as the Tax Assessor-Collector. As part of my responsibilities, I accept and process applications for election identification certificates ("EICs") received by the Irion County Tax Assessor-Collector's office.
- 4. My office accepts applications for EICs. Applicants must appear in person to submit their application.
- 5. Irion County does not currently have an operational driver license office.

- 6. My office is located at 209 N. Parkview, Mertzon, Texas 76941. It is open Monday through Friday, from 8:00 am to noon, and from 1:15 pm to 5:00 pm.
- 7. Between the dates of June 25, 2013, to the present, my office received a total of zero complete EIC applications.
- 8. Between the dates of June 25, 2013, to the present, my office received a total of zero incomplete or otherwise incorrect EIC applications.
- To the best of my knowledge, the Irion County Tax Assessor-Collector's office does not have any plans to change its location or hours of operation prior to the November 4, 2014, general election.

Executed on this the 571 day of 2014.

Joyce Gray

MARC VEASEY, et al.,

Plaintiffs,

V.

RICK PERRY, et al.,

Defendants.

UNITED STATES OF AMERICA,

Plaintiff,

TEXAS LEAGUE OF YOUNG VOTERS EDUCATION FUND, et al.,

Plaintiff-Intervenors,

TEXAS ASSOCIATION OF HISPANIC COUNTY JUDGES AND COUNTY COMMISSIONERS, et al.,

Plaintiff-Intervenors,

V.

STATE OF TEXAS, et al.,

Defendants.

Civil Action No. 2:13-cv-193 (NGR)

Plaintiffs,

V.

NANDITA BERRY, et al.,

Defendants.

BELINDA ORTIZ, et al.,

Plaintiffs,

V.

STATE OF TEXAS, et al.,

Defendants

Civil Action No. 2:13-cv-291 (NGR)

Civil Action No. 2:13-cv-348 (NGR)

## **DECLARATION OF BARBARA WILLIAMS**

I, Barbara Williams, pursuant to 28 U.S.C. § 1746, hereby declare as follows:

- I make this declaration based on personal knowledge and am competent to do so. If called as a witness and placed under oath, I could and would testify thereto.
- I am a resident of Jackson County, Texas.
- I am employed by Jackson County, where I serve as the County Clerk. As part of my
  responsibilities, I accept and process applications for election identification certificates
  ("EIC") received by the Jackson County Clerk's office.
- My office accepts applications for EICs. Applicants must appear in person to submit their application.
- Jackson County does not currently have an operational driver license office.

- My office is located at 115 West Main Street Room 101, Edna, Texas 77957. It is open Monday through Friday, from 8:00 am to 5:00 pm.
- Between the dates of June 25, 2013, to the present, my office received a total of zero complete EIC applications.
- Between the dates of June 25, 2013, to the present, my office received a total of zero incomplete or otherwise incorrect EIC applications.
- To the best of my knowledge, the Jackson County Clerk's office does not have any plans to change its location or hours of operation prior to the November 4, 2014, general election.

Executed on this the 2 2 day of April 2014.

Barbara Williams

MARC VEASEY, et al.,

Plaintiffs,

v.

RICK PERRY, et al.,

Defendants.

UNITED STATES OF AMERICA,

Plaintiff,

TEXAS LEAGUE OF YOUNG VOTERS EDUCATION FUND, et al.,

Plaintiff-Intervenors,

TEXAS ASSOCIATION OF HISPANIC COUNTY JUDGES AND COUNTY COMMISSIONERS, et al.,

Plaintiff-Intervenors,

V.

STATE OF TEXAS, et al.,

Defendants.

Civil Action No. 2:13-cv-193 (NGR)

Plaintiffs,

٧.

NANDITA BERRY, et al.,

Defendants.

BELINDA ORTIZ, et al.,

Plaintiffs,

v.

STATE OF TEXAS, et al.,

Defendants

Civil Action No. 2:13-cv-291 (NGR)

Civil Action No. 2:13-cv-348 (NGR)

### **DECLARATION OF NORMA L. HINOJOSA**

- I, Norma L. Hinojosa, pursuant to 28 U.S.C. § 1746, hereby declare as follows:
- I make this declaration based on personal knowledge and am competent to do so. If called as a witness and placed under oath, I could and would testify thereto.
- 2. I am a resident of Jim Hogg County, Texas.
- 3. I am employed by Jim Hogg County, where I serve as the Tax Assessor-Collector. As part of my responsibilities, I accept and process applications for election identification certificates ("EIC") received by the Jim Hogg County Tax Assessor-Collector's office.
- 4. My office accepts applications for EICs. Applicants must appear in person to submit their application.
- 5. Jim Hogg County does not currently have an operational driver license office.

- My office is located at 205 E. Tilley, Hebbronville, Texas 78361. It is open Monday through Friday, from 9:00 am to noon, and 1:00 pm to 5:00 pm.
- Between the dates of June 25, 2013, to the present, my office received a total of seven complete EIC applications.
- Between the dates of June 25, 2013, to the present, my office received a total of zero incomplete or otherwise incorrect EIC applications.
- To the best of my knowledge, the Jim Hogg County Tax Assessor-Collector's office does not have any plans to change its location or hours of operation prior to the November 4, 2014, general election.

Executed on this the 25th day of April 2014.

Norma L. Hinojosa

MARC VEASEY, et al.,

Plaintiffs,

v.

RICK PERRY, et al.,

Defendants.

UNITED STATES OF AMERICA,

Plaintiff,

TEXAS LEAGUE OF YOUNG VOTERS EDUCATION FUND, et al.,

Plaintiff-Intervenors,

TEXAS ASSOCIATION OF HISPANIC COUNTY JUDGES AND COUNTY COMMISSIONERS, et al.,

Plaintiff-Intervenors,

V.

STATE OF TEXAS, et al.,

Defendants.

Civil Action No. 2:13-cv-193 (NGR)

Plaintiffs,

V.

NANDITA BERRY, et al.,

Defendants.

BELINDA ORTIZ, et al.,

Plaintiffs,

V.

STATE OF TEXAS, et al.,

Defendants

Civil Action No. 2:13-cv-291 (NGR)

Civil Action No. 2:13-cv-348 (NGR)

### **DECLARATION OF KAREN L. OPIELA**

- I, Karen L. Opiela, pursuant to 28 U.S.C. § 1746, hereby declare as follows:
- I make this declaration based on personal knowledge and am competent to do so. If called as a witness and placed under oath, I could and would testify thereto.
- 2. I am a resident of Wilson County, Texas.
- 3. I am employed with the Karnes County Elections Office, where I serve as the Elections Administrator. As part of my responsibilities, I accept and process applications for election identification certificates ("EIC") received by the Karnes County Elections Office.
- 4. My office accepts applications for EICs. Applicants must appear in person to submit their application.

- 5. Karnes County does not currently have an operational driver license office.
- 6. My office is located at 210 W. Calvert Street, Suite 140, Karnes City, Texas 78118. It is open Monday through Thursday, from 9:00 am to 4:00 pm, and on Friday from 9:00 am to noon.
- 7. Between the dates of June 25, 2013, to the present, my office received a total of zero complete EIC applications.
- 8. Between the dates of June 25, 2013, to the present, my office received a total of zero incomplete or otherwise incorrect EIC applications.
- 9. To the best of my knowledge, the Karnes County Elections Office does not have any plans to change its location or hours of operation prior to the November 4, 2014, general election.

Executed on this the 22nd day of April 2014.

Karen L. Opiela

