

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

MARC VEASEY, *et al.*,

Plaintiffs,

v.

GREG ABBOTT, *et al.*,

Defendants.

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

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-263 (NGR)

TEXAS STATE CONFERENCE OF NAACP
BRANCHES, *et al.*,

Plaintiffs,

v.

CARLOS CASCOS, *et al.*,

Defendants.

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

LENARD TAYLOR, *et al.*,

Plaintiffs,

v.

STATE OF TEXAS, *et al.*,

Defendants

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

JOINT SUBMISSION OF AGREED TERMS

Pursuant to this Court's July 21 Order (ECF No. 859) and July 26 Order (ECF No. 869), the parties jointly propose that the Court incorporate the following terms in its interim remedy order:

1. Voters who appear on the official list of registered voters and present documentation that is acceptable photo identification under Section 63.0101 of the Texas Election Code (SB 14 ID) or SB 14 ID that has expired by no more than four years shall be permitted to vote using a regular ballot.
2. Voters who appear on the official list of registered voters and present a valid voter registration certificate, a certified birth certificate, a current utility bill, a bank statement, a government check, a paycheck, or any other government document that displays the

voter's name and an address and complete and sign a reasonable impediment declaration shall be permitted to vote using a regular ballot.

3. Defendants shall use the document attached to this Order as Exhibit 1 as the English-language reasonable impediment declaration.
4. Defendants shall ensure that the reasonable impediment declaration is translated into Spanish, Chinese, and Vietnamese for use in appropriate jurisdictions. Defendants shall also inform the Elections Administrators in El Paso County and Maverick County in writing of the need to include the reasonable impediment declaration in the list of documents that need to be orally translated in accordance with Section 203 of the Voting Rights Act, 52 U.S.C. § 10503.
5. The reasonableness of a voter's impediment to obtain SB 14 ID shall not be questioned by election officials.
6. After asking a voter if he or she has SB 14 ID, election officials shall not question or challenge voters concerning the voter's lack of SB 14 ID and the voter's claimed impediment to obtaining SB 14 ID prior to allowing a voter to cast a regular ballot with a reasonable impediment declaration.
7. A signed reasonable impediment declaration shall be rejected only upon conclusive evidence that the person completing the declaration is not the person in whose name the ballot will be cast.
8. No identification document provided pursuant to Paragraphs 1 or 2 shall be rejected based on the fact that the address on such document does not match the address recorded in the official list of registered voters.

9. Pursuant to Section 33.058 of the Texas Election Code, poll watchers shall not be permitted to communicate in any manner with any voter concerning the procedures outlined in this Order, presentation of identification, or the validity of a voter's impediment to obtain identification.
10. Defendants shall develop a detailed voter education plan, including timetables, for the November 2016 general election by no later than August 15, 2016. This plan shall include a statement of the total planned expenditure, in an amount equal to or greater than \$2,500,000.
11. Commencing with any elections held after the entry of this Order and until further order of the Court, Defendants shall continue to educate voters in subsequent elections concerning both voter identification requirements and the opportunity for voters who do not possess SB 14 ID and cannot reasonably obtain it to cast a regular ballot.
12. Defendants shall develop a detailed election official training program for the November 2016 general election by no later than August 15, 2016.
13. Defendants shall not modify the English-language reasonable impediment declaration attached to this Order as Exhibit 1 without either submission of a Notice to this Court including both a copy of the document and a statement indicating that all Plaintiffs have consented to the modification or an order of this Court.
14. These procedures shall remain in place until further order of this Court. Nothing in this order shall prevent any party from seeking relief based on future events, including but not limited to legislative action.

A copy of the proposed reasonable impediment declaration is attached to this submission as Exhibit 1. The parties will separately submit brief filings concerning any limited remaining terms upon which we have not been able to reach agreement.

Date: August 3, 2016

Respectfully submitted.

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VANITA GUPTA
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/s/ Daniel J. Freeman _____

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CERTIFICATE OF SERVICE

I hereby certify that on August 3, 2016, a true and correct copy of the foregoing document was served via the Court's ECF system to all counsel of record.

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