

**IN THE UNITED STATES DISTRICT COURT
FOR THE WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION**

La Unión Del Pueblo Entero, *et al.*,

Plaintiffs,

v.

Gregory W. Abbott, *et al.*,

Defendants.

No. 5:21-cv-00844-XR

**HARRIS COUNTY REPUBLICAN PARTY, DALLAS COUNTY REPUBLICAN PARTY,
REPUBLICAN NATIONAL COMMITTEE, NATIONAL REPUBLICAN SENATORIAL
COMMITTEE, AND NATIONAL REPUBLICAN CONGRESSIONAL COMMITTEE’S
[PROPOSED] ANSWER TO SECOND AMENDED COMPLAINT**

Intervenor-Defendants Harris County Republican Party, Dallas County Republican Party, Republican National Committee, National Republican Senatorial Committee, and National Republican Congressional Committee (the “Republican Committees”) respectfully answer Plaintiffs’ Complaint. Any allegation in the Complaint not explicitly responded to in this Answer is hereby denied.

INTRODUCTION

1. The Republican Committees support free and fair elections for all Texans and for all voters across the country. The statements of public officials speak for themselves and do not require a response. To the extent that a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the remaining allegations in Paragraph 1 and so deny them.

2. The Republican Committees admit that the Texas Legislature enacted SB 1. The Republican Committees deny that SB 1 “suppress[es] Texas voters” or that Plaintiffs’ descriptions

of the law and its effects are accurate. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 2 and so deny them. The statute speaks for itself and does not require a response. Paragraph 2 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

3. The Republican Committees admit that Gregory W. Abbott is the Governor of Texas. The Republican Committees deny that SB 1 was enacted for “pretextual” reasons and deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford v. Marion County Election Board*, 553 U.S. 181, 196 (2008). Legislative history speaks for itself and does not require a response. Paragraph 3 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 3 and so deny them.

4. The Republican Committees deny that SB 1 is a “reaction” to any demographic changes in the electorate, that claims of threats to election integrity are “baseless,” that it is hard to vote in Texas elections, or that SB 1 makes it “harder” to vote. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 4 and so deny them.

5. The statutes speak for themselves and do not require a response. Paragraph 5 states legal conclusions and/or statements of what the law provides or should provide, to which no

response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 5 and so deny them.

6. The Republican Committees deny that Plaintiffs are entitled to relief.

JURISDICTION AND VENUE

7. Paragraph 7 states legal conclusions that do not require a response. To the extent a response is required, the Republican Committees deny these allegations.

8. Paragraph 8 states a legal conclusion that does not require a response. To the extent a response is required, the Republican Committees do not contest venue; and, except as expressly admitted, the Republican Committees deny any remaining allegations in Paragraph 8.

PARTIES

9. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 9 and so deny them.

10. Paragraph 10 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 10 and so deny them.

11. Paragraph 11 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 11 and so deny them.

12. Paragraph 12 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 12 and so deny them.

13. Paragraph 13 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 13 and so deny them.

14. Paragraph 14 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 14 and so deny them.

15. Paragraph 15 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 15 and so deny them.

16. Paragraph 16 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information

sufficient to form a belief about the truth of the remaining allegations in Paragraph 16 and so deny them.

17. Paragraph 17 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 17 and so deny them.

18. Paragraph 18 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 18 and so deny them.

19. Paragraph 19 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 19 and so deny them.

20. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 20 and so deny them.

21. The Republican Committees admit that the State of Texas is one of the States of the United States of America.

22. The Republican Committees admit that Defendant Scott is the Secretary of State of Texas. Statutes and court decisions speak for themselves and do not require a response. Paragraph

22 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

23. Court decisions speak for themselves and do not require a response. Paragraph 23 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 23 and so deny them.

24. The statutes speak for themselves and do not require a response. Paragraph 24 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

25. Statutes and court decisions speak for themselves and do not require a response. Paragraph 25 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

26. The statute speaks for itself and does not require a response. Paragraph 26 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 26 and so deny them.

27. Statutes and court decisions speak for themselves and do not require a response. Paragraph 27 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

28. The statutes speak for themselves and do not require a response. Paragraph 28 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

29. The statute speaks for itself and does not require a response. Paragraph 29 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

30. The statute speaks for itself and does not require a response. Paragraph 30 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

31. The statutes speak for themselves and do not require a response. Paragraph 31 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 31 and so deny them.

32. The statute speaks for itself and does not require a response. Paragraph 32 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

33. Statements on a government website speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 33 and so deny them.

34. Statutes and statements on a government website speak for themselves and do not require a response. Paragraph 34 states legal conclusions and/or statements of what the law

provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 34 and so deny them.

35. The statute speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 35 and so deny them.

36. The Republican Committees admit that Defendant Paxton is the Attorney General of Texas and that Plaintiffs purport to sue him in his official capacity.

37. Court decisions speak for themselves and do not require a response. Paragraph 37 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

38. Statements on a government website and in press releases speak for themselves and do not require a response. Paragraph 38 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 38 and so deny them.

39. Court decisions, statutes, and court filings speak for themselves and do not require a response. Paragraph 39 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 39 and so deny them.

40. The statutes speak for themselves and do not require a response. Paragraph 40 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

41. Court decisions and filings speak for themselves and do not require a response. Paragraph 41 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 41 and so deny them.

42. The statements of public officials speak for themselves and do not require a response. Paragraph 42 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 42 and so deny them.

43. The Republican Committees admit that Defendant Scarpello is the Elections Administrator of Dallas County and that Plaintiffs purport to sue him in his official capacity.

44. The Republican Committees admit that Defendant Wise is the Elections Administrator of El Paso County and that Plaintiffs purport to sue her in her official capacity.

45. The statutes speak for themselves and do not require a response. Paragraph 45 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 45 and so deny them.

46. The statute speaks for itself and does not require a response. Paragraph 46 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

47. The statute speaks for itself and does not require a response. Paragraph 47 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

48. The Republican Committees admit that Defendant Creuzot is the Dallas County District Attorney and that Plaintiffs purport to sue him in his official capacity.

49. The Republican Committees admit that Defendant Rosales is the El Paso County District Attorney and that Plaintiffs purport to sue her in her official capacity.

50. The Republican Committees admit that Defendant Garza is the Travis County District Attorney and that Plaintiffs purport to sue him in his official capacity.

51. The statutes speak for themselves and do not require a response. Paragraph 51 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

52. Paragraph 52 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

FACT BACKGROUND

53. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history. The Republican Committees deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. Court decisions speak for themselves. Paragraph 53 states legal conclusions and/or statements of what the law provides or should

provide, to which no response is required. To the extent a response is required, these allegations are denied.

54. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history. The Republican Committees deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 54 and so deny them.

55. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history. The Republican Committees deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. Paragraph 55 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. Court decisions speak for themselves and do not require a response. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 55 and so deny them.

56. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history. The Republican Committees deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. Paragraph 56 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 56 and so deny them.

57. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history. The Republican Committees deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 57 and so deny them.

58. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history. The Republican Committees deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 58 and so deny them.

59. Court decisions speak for themselves and do not require a response. Paragraph 59 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

60. Court decisions speak for themselves and do not require a response. Paragraph 60 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

61. Court decisions and statements made in media articles speak for themselves and do not require a response. Paragraph 61 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 61 and so deny them.

62. The Republican Committees deny that Texas voting procedures are “onerous.” Statements made in media articles speak for themselves and do not require a response. Paragraph 62 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 62 and so deny them.

63. The referenced report and statutes speak for themselves and do not require a response. Paragraph 63 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 63 and so deny them.

64. Voter turnout and Census Bureau data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 64 and so deny them.

65. Voter turnout data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 65 and so deny them.

66. Voter turnout data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 66 and so deny them.

67. Statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 67 and so deny them.

68. Voter turnout data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 68 and so deny them.

69. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 69 and so deny them.

70. The referenced guidance speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 70 and so deny them.

71. The referenced guidance speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 71 and so deny them.

72. The referenced proclamation speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 72 and so deny them.

73. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 73 and so deny them.

74. Statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge

or information sufficient to form a belief about the truth of the allegations in Paragraph 74 and so deny them.

75. Voter turnout data and statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 75 and so deny them.

76. Statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 76 and so deny them.

77. The Republican Committees deny that Governor Abbott or Attorney General Paxton “impos[ed] obstacles that limited exercise of the franchise.” The statements of public officials speak for themselves and do not require a response. Paragraph 77 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 77 and so deny them.

78. The statements of public officials speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 78 and so deny them.

79. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,”

voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. The statements of public officials and statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 79 and so deny them.

80. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. Statements made in media articles speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 80 and so deny them.

81. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 81 and so deny them.

82. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the

legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. The referenced source speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 82 and so deny them.

83. The Republican Committees deny that SB 1 contains any “restrictions designed to intimidate and discourage Texas voters and, in particular, Texas’s minority voters.” Legislative history speaks for itself and does not require a response. Paragraph 83 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

84. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 84 and so deny them.

85. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 85 and so deny them.

86. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 86 and so deny them.

87. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 87 and so deny them.

88. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 88 and so deny them.

89. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 89 and so deny them.

90. The statements of public officials speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 90 and so deny them.

91. The Republican Committees admit that Governor Abbott signed SB 1 into law on September 7, 2021.

92. Paragraph 92 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

93. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 93 and so deny them.

94. The statements of public officials speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 94 and so deny them.

95. The statements of public officials and on a government website speak for themselves and do not require a response. To the extent a response is required, the Republican

Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 95 and so deny them.

96. The statements of public officials and on a government website speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 96 and so deny them.

97. The statements of public officials and on a government website speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 97 and so deny them.

98. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. The statements of public officials and press releases speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 98 and so deny them.

99. The statements of public officials speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 99 and so deny them.

100. The statements of public officials speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 100 and so deny them.

101. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 101 and so deny them.

102. The Republican Committees deny the allegations in Paragraph 102.

103. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. Legislative history speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 103 and so deny them.

104. The Republican Committees deny that SB 1 “targets” any eligible voter. The statute speaks for itself and does not require a response. Paragraph 104 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 104 and so deny them.

105. The referenced data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 105 and so deny them.

106. Government health data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 106 and so deny them.

107. The Republican Committees deny that SB 1 “imposes . . . new restrictions” on voter assistance. The statute speaks for itself and does not require a response. Paragraph 107 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

108. The Republican Committees deny that the assistor’s oath is “onerous” or “intimidating.” The statute speaks for itself and does not require a response. Paragraph 108 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

109. The Republican Committees deny that the assistor’s oath will deter voters who need assistance or individuals from serving as assistors. The statute speaks for itself and does not require a response. Paragraph 109 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

110. The statute speaks for itself and does not require a response. Paragraph 110 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

111. The statute speaks for itself and does not require a response. Paragraph 111 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 111 and so deny them.

112. The statutes speak for themselves and do not require a response. Paragraph 112 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 112 and so deny them.

113. The Republican Committees deny that SB 1 will burden the right to vote of those seeking assistance. The statutes speak for themselves and do not require a response. Paragraph 113 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 113 and so deny them.

114. The statutes speak for themselves and do not require a response. Paragraph 114 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 114 and so deny them.

115. The Republican Committees deny that SB 1 will “reduc[e] access to voting for voters who need assistance,” “depriv[e] them of assistance by their chosen assistors,” or “deter

voter assistance.” The statutes speak for themselves and do not require a response. Paragraph 115 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 115 and so deny them.

116. Paragraph 116 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

117. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 117 and so deny them.

118. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. Statements made in a video speak for themselves and do not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 118 and so deny them.

119. The statute speaks for itself and does not require a response. The Republican Committees deny that SB 1 makes the work of election workers harder. Paragraph 119 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

120. The statute speaks for itself and does not require a response. The Republican Committees deny that SB 1 limits the ability of election officials and election judges to manage

unruly poll watchers. Paragraph 120 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

121. The statute speaks for itself and does not require a response. Paragraph 121 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

122. The statute speaks for itself and does not require a response. The Republican Committees deny that SB 1 permits poll watchers to intimidate voters or cause disruptions. Paragraph 122 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

123. The statute speaks for itself and does not require a response. Paragraph 123 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

124. The statutes speak for themselves and do not require a response. Paragraph 124 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

125. The statute speaks for itself and does not require a response. Paragraph 125 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

126. The Republican Committees deny the allegations in Paragraph 126.

127. The statutes speak for themselves and do not require a response. Paragraph 127 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

128. The statute speaks for itself and does not require a response. Paragraph 128 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

129. Paragraph 129 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

130. Paragraph 130 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 130 and so deny them.

131. The Republican Committees deny that SB 1 imposes burdens on voters. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 131 and so deny them.

132. Paragraph 132 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 132 and so deny them.

133. The statutes and referenced article speak for themselves and do not require a response. Paragraph 133 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 133 and so deny them.

134. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. The statute and referenced report speak for themselves and do not require a response. Paragraph 134 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 134 and so deny them.

135. The statutes speak for themselves and do not require a response. Paragraph 135 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

136. The statutes speak for themselves and do not require a response. Paragraph 136 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

137. The Republican Committees deny that SB 1 “takes aim at community-based organizations.” The statute speaks for itself and does not require a response. Paragraph 137 states

legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

138. The statutes speak for themselves and do not require a response. Paragraph 138 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

139. The statute speaks for itself and does not require a response. Paragraph 139 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

140. The statute speaks for itself and does not require a response. Paragraph 140 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

141. The statutes speak for themselves and do not require a response. Paragraph 141 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 141 and so deny them.

142. Paragraph 142 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 142 and so deny them.

143. The Republican Committees deny that “SB 1 will reduce voter participation.” Paragraph 143 states legal conclusions and/or statements of what the law provides or should

provide, to which no response is required. To the extent a response is required, these allegations are denied.

144. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. Paragraph 144 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 144 and so deny them.

145. The Republican Committees deny that SB 1 will have a chilling effect on voter registration. The statute speaks for itself and does not require a response. Paragraph 145 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 145 and so deny them.

146. The statute speaks for itself and does not require a response. Paragraph 146 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 146 and so deny them.

147. The statutes speak for themselves and do not require a response. Paragraph 147 states legal conclusions and/or statements of what the law provides or should provide, to which no

response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 147 and so deny them.

148. The statutes speak for themselves and do not require a response. Paragraph 148 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 148 and so deny them. Footnote 130 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

149. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 149 and so deny them.

150. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 150 and so deny them.

151. Paragraph 151 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 151 and so deny them.

152. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 152 and so deny them.

153. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 153 and so deny them.

154. Paragraph 154 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 154 and so deny them.

155. Paragraph 155 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 155 and so deny them.

156. Paragraph 156 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 156 and so deny them.

157. Paragraph 157 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 157 and so deny them.

158. Paragraph 158 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information

sufficient to form a belief about the truth of the remaining allegations in Paragraph 158 and so deny them.

159. The Republican Committees deny that SB 1 permits poll watchers to intimidate voters. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 159 and so deny them.

160. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 160 and so deny them.

161. The Republican Committees deny that SB 1 will deter anyone from serving as an assistor. Paragraph 161 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 161 and so deny them.

162. The Republican Committees deny that SB 1 has negative effects. Paragraph 162 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 162 and so deny them.

163. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 163 and so deny them.

164. The Republican Committees deny that SB 1 will reduce the number of people available to assist voters, reduce turnout of voters who rely on assistance, or subject anyone to felony prosecution for assisting voters in accordance with the law. Paragraph 164 states legal

conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 164 and so deny them.

165. The Republican Committees deny that SB 1 will reduce the number of people available to assist voters, reduce turnout of voters who rely on assistance, or subject anyone to felony prosecution for assisting voters in accordance with the law. Paragraph 165 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 165 and so deny them.

166. The Republican Committees deny that SB 1 will reduce the number of people available to assist voters, reduce turnout of voters who rely on assistance, or subject anyone to felony prosecution for assisting voters in accordance with the law. Paragraph 166 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 166 and so deny them.

167. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 167 and so deny them.

168. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 168 and so deny them.

169. The Republican Committees deny that Plaintiff's alleged confusion or fears about SB 1 are reasonable. Paragraph 169 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 169 and so deny them.

170. The Republican Committees deny that SB 1's provisions are confusing or vague. Paragraph 170 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 170 and so deny them.

171. Paragraph 171 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 171 and so deny them.

172. The Republican Committees deny that SB 1 "criminalize[s]" voter assistance and deny that Plaintiff's concerns are reasonable. Paragraph 172 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 172 and so deny them.

173. The Republican Committees deny that SB 1's provisions are confusing or vague. Paragraph 173 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 173 and so deny them.

174. Paragraph 174 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 174 and so deny them.

175. The Republican Committees deny that SB 1 has negative effects. The statute speaks for itself and does not require a response. Paragraph 175 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 175 and so deny them.

176. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 176 and so deny them.

177. Paragraph 177 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 177 and so deny them.

178. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 178 and so deny them.

179. The Republican Committees deny that SB 1 will deter anyone from serving as an assistor. Paragraph 179 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 179 and so deny them.

180. The Republican Committees deny that SB 1 will reduce the number of people available to assist voters, reduce turnout of voters who rely on assistance, or subject anyone to felony prosecution for assisting voters in accordance with the law. Paragraph 180 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 180 and so deny them.

181. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 181 and so deny them.

182. Paragraph 182 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 182 and so deny them.

183. Paragraph 183 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 183 and so deny them.

184. The Republican Committees deny that SB 1 imposes burdens on mail voting. Paragraph 184 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 184 and so deny them.

185. The Republican Committees deny that SB 1 will deter anyone from assisting eligible voters. Paragraph 185 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 185 and so deny them.

186. The Republican Committees deny that SB 1's provisions are onerous, confusing, or vague. Paragraph 186 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 186 and so deny them.

187. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 187 and so deny them.

188. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 188 and so deny them.

189. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 189 and so deny them.

190. The Republican Committees deny that SB 1 will deter anyone from serving as an assistor. Paragraph 190 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 190 and so deny them.

191. The Republican Committees deny that SB 1 will injure anyone. Paragraph 191 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 191 and so deny them.

192. The Republican Committees deny that SB 1 has negative effects. Paragraph 192 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 192 and so deny them.

193. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 193 and so deny them.

194. Paragraph 194 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 194 and so deny them.

195. The Republican Committees deny that SB 1 has negative effects. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 195 and so deny them.

196. Paragraph 196 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 196 and so deny them.

197. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 197 and so deny them. The Republican Committees specifically deny that SB 1 permits poll watchers to intimidate voters.

198. The Republican Committees deny that SB 1 imposes “barriers” on mail voting. Paragraph 198 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 198 and so deny them.

199. The Republican Committees deny that SB 1 permits poll watchers to intimidate or harass voters. Paragraph 199 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 199 and so deny them.

200. The Republican Committees deny that SB 1 “suppress[es] Latino voters,” “depress[es] Latino turnout,” or decreases the interest in or convenience of voting. Paragraph 200 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 200 and so deny them.

201. Paragraph 201 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 201 and so deny them.

202. The Republican Committees deny that SB 1 has negative effects. Paragraph 202 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 202 and so deny them.

203. The statute speaks for itself and does not require a response. Paragraph 203 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 203 and so deny them.

204. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 204 and so deny them.

205. The Republican Committees deny that SB 1 will deter anyone from serving as an assistor. Paragraph 205 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 205 and so deny them.

206. The Republican Committees deny that SB 1 will reduce the number of people available to assist voters, reduce turnout of voters who rely on assistance, or subject anyone to felony prosecution for assisting voters in accordance with the law. Paragraph 206 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 206 and so deny them.

207. Paragraph 207 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information

sufficient to form a belief about the truth of the remaining allegations in Paragraph 207 and so deny them.

208. The Republican Committees deny that SB 1's provisions are confusing or vague. Paragraph 208 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 208 and so deny them.

209. Paragraph 209 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 209 and so deny them.

210. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 210 and so deny them.

211. Paragraph 211 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 211 and so deny them.

212. The Republican Committees deny that SB 1 will deter anyone from serving as an assistor. Paragraph 212 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information

sufficient to form a belief about the truth of the remaining allegations in Paragraph 212 and so deny them.

213. The Republican Committees deny that SB 1 will reduce the number of people available to assist voters, reduce turnout of voters who rely on assistance, or subject anyone to felony prosecution for assisting voters in accordance with the law. Paragraph 213 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 213 and so deny them.

214. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 214 and so deny them.

215. Paragraph 215 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 215 and so deny them.

216. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the allegations in Paragraph 216 and so deny them.

217. The statute speaks for itself and does not require a response. Paragraph 217 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 217 and so deny them.

COUNT I

218. The Republican Committees incorporate their responses to the preceding paragraphs.

219. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees deny that SB 1 unlawfully infringes on the right to vote.

220. Court decisions speak for themselves and do not require a response. Paragraph 220 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

221. Court decisions speak for themselves and do not require a response. Paragraph 221 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

222. The statutes speak for themselves and do not require a response. Paragraph 222 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

223. The Republican Committees deny that SB 1 “imposes severe burdens on” or denies the right to vote. Paragraph 223 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 223 and so deny them.

224. The Republican Committees deny that SB 1 “imposes severe burdens on” or denies the right to vote. Paragraph 224 states legal conclusions and/or statements of what the law provides

or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 224 and so deny them.

225. The Republican Committees deny that SB 1 “imposes severe burdens on” or denies the right to vote. Paragraph 225 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 225 and so deny them.

226. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. Paragraph 226 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 226 and so deny them.

227. The Republican Committees deny that SB 1 will disenfranchise anyone. Paragraph 227 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 227 and so deny them.

228. The Republican Committees deny that SB 1 will deter election officials from taking action against “intimidating behavior” or make it more likely that anyone “will be subject to abuse in and around polling places.” Paragraph 228 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 228 and so deny them.

229. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. The Republican Committees deny that SB 1 was “pretext[ual].” Paragraph 229 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

COUNT II

230. The Republican Committees incorporate their responses to the preceding paragraphs.

231. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees deny that SB 1 unlawfully infringes on the right to vote.

232. The Fourteenth Amendment speaks for itself and does not require a response.

233. The Fourteenth Amendment and court decisions speak for themselves and do not require a response. Paragraph 233 states legal conclusions and/or statements of what the law

provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

234. The Republican Committees deny that SB 1 was enacted “with the intent to discriminate against voters of color, on the basis of race and national origin.” Paragraph 234 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

235. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. The Republican Committees deny that SB 1 was “pretext[ual].” Paragraph 235 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

236. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history. The Republican Committees deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. Court decisions speak for themselves and do not require a response. Paragraph 236 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

237. Voter turnout data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 237 and so deny them.

238. The Republican Committees deny that SB 1 “target[s]” or “disproportionately burden[s]” anyone. Paragraph 238 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

239. The Republican Committees deny that SB 1 has a “disparate racial impact.” Legislative history speaks for itself and does not require a response. Paragraph 239 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

240. The Republican Committees deny that SB 1 “burdens” anyone’s right to vote. Paragraph 240 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

241. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history. The Republican Committees deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. Paragraph 241 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

COUNT III

242. The Republican Committees incorporate their responses to the preceding paragraphs.

243. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees deny that SB 1 unlawfully infringes on the right to vote.

244. The Fifteenth Amendment to the U.S. Constitution speaks for itself and does not require a response.

245. The Fifteenth Amendment and court decisions speak for themselves and do not require a response. Paragraph 245 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

246. Court decisions speak for themselves and do not require a response. Paragraph 246 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

247. The Republican Committees deny that SB 1 was enacted “with the intent to discriminate against voters of color, on the basis of race and national origin.” Paragraph 247 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

248. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. The Republican Committees deny that SB 1 was “pretext[ual].” Paragraph 248 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

249. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history. The Republican Committees deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. Paragraph 249 states legal conclusions and/or

statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

250. Voter turnout data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 250 and so deny them.

251. The Republican Committees deny that SB 1 “target[s]” or “disproportionately burden[s]” anyone. Paragraph 251 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

252. The Republican Committees deny that SB 1 has a “disparate racial impact.” Legislative history speaks for itself and does not require a response. Paragraph 252 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

253. The Republican Committees deny that SB 1 “burdens” anyone’s right to vote. Paragraph 253 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

254. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history. The Republican Committees deny that this history is relevant to SB 1 or that SB 1 was motivated by racial discrimination. Paragraph 254 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

COUNT IV

255. The Republican Committees incorporate their responses to the preceding paragraphs.

256. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees deny that SB 1 unlawfully infringes on the right to vote.

257. The Voting Rights Act speaks for itself and does not require a response.

258. The Voting Rights Act and court decisions speak for themselves and do not require a response. Paragraph 258 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

259. Court decisions speak for themselves and do not require a response. Paragraph 259 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

260. The Republican Committees deny that there is not a substantial risk of fraud in Texas elections. According to the United States Supreme Court, the “risk of voter fraud” is “real,” voter fraud “could affect the outcome of a close election,” and “[t]here is no question about the legitimacy or importance of the State’s interest” in combatting it. *Crawford*, 553 U.S. at 196. The Republican Committees deny that SB 1 was “pretext[ual].” Paragraph 260 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

261. The Republican Committees do not doubt that racial discrimination occurred in Texas during its history. The Republican Committees deny that this history is relevant to SB 1 or

that SB 1 was motivated by racial discrimination. Paragraph 261 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

262. Voter turnout data speaks for itself and does not require a response. To the extent a response is required, the Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 262 and so deny them.

263. The Republican Committees deny that SB 1 “target[s]” or “disproportionately burden[s]” anyone. Paragraph 263 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

264. The Republican Committees deny that SB 1 “burdens” anyone’s right to vote. Paragraph 264 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

265. The Republican Committees deny that SB 1 “burdens” anyone’s right to vote. Paragraph 265 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

COUNT V

266. The Republican Committees incorporate their responses to the preceding paragraphs.

267. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees deny that SB 1 unlawfully infringes on the right to vote.

268. The Voting Rights Act speaks for itself and does not require a response.

269. The Voting Rights Act speaks for itself and does not require a response. Paragraph 269 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

270. The Republican Committees deny that SB 1 “imped[e]” voters’ ability to get assistance or deters individuals from providing assistance to voters. Paragraph 270 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

271. The Republican Committees deny that SB 1 violates Section 208 of the Voting Rights Act. Court decisions speak for themselves and do not require a response. Paragraph 271 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

COUNT VI

272. The Republican Committees incorporate their responses to the preceding paragraphs.

273. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees deny that SB 1 unlawfully infringes on the right to vote.

274. The Americans with Disabilities Act (ADA) speaks for itself and does not require a response. Paragraph 274 states legal conclusions and/or statements of what the law provides or

should provide, to which no response is required. To the extent a response is required, these allegations are denied.

275. The ADA and regulations speak for themselves and do not require a response. Paragraph 275 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

276. The ADA speaks for itself and does not require a response. Paragraph 276 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

277. The ADA and court decisions speak for themselves and do not require a response. Paragraph 277 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

278. Paragraph 278 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

279. The ADA speaks for itself and does not require a response. Paragraph 279 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 279 and so deny them.

280. The Republican Committees deny that SB 1 “burdens” any voter, “den[ies] voters with disabilities equal access to the franchise,” or “prevent[s] voters from exercising their

fundamental right to vote.” Paragraph 280 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

281. The Republican Committees deny that SB 1 “discriminate[s]” against any qualified voters. The statutes speak for themselves and do not require a response. Paragraph 281 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

282. The Republican Committees deny that SB 1 “discriminate[s]” against Plaintiffs. Paragraph 282 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 282 and so deny them.

283. Paragraph 283 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 283 and so deny them.

284. Paragraph 284 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 284 and so deny them.

285. Paragraph 285 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied. The Republican Committees are without knowledge or information sufficient to form a belief about the truth of the remaining allegations in Paragraph 285 and so deny them.

COUNT VII

286. The Republican Committees incorporate their responses to the preceding paragraphs.

287. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees deny that SB 1 unlawfully infringes on the right to vote.

288. The Fourteenth Amendment and court decisions speak for themselves and do not require a response. Paragraph 288 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

289. The First Amendment and court decisions speak for themselves and do not require a response. Paragraph 289 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

290. The Republican Committees deny that SB 1 is unconstitutional. Paragraph 290 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

291. The Republican Committees deny that SB 1 is unconstitutional. The statutes speak for themselves and do not require a response. Paragraph 291 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

292. The Republican Committees deny that SB 1 is unconstitutional. The statute speaks for itself and does not require a response. Paragraph 292 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

293. The Republican Committees deny that SB 1 is unconstitutional. Paragraph 293 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

294. The Republican Committees deny that SB 1 is unconstitutional. The statute speaks for itself and does not require a response. Paragraph 294 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

295. The Republican Committees deny that SB 1 is unconstitutional. The statute speaks for itself and does not require a response. Paragraph 295 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

296. The First and Fourteenth Amendments and court decisions speak for themselves and do not require a response. Paragraph 296 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

297. The Republican Committees deny that SB 1 is unconstitutional. The statute and court decisions speak for themselves and do not require a response. Paragraph 297 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

298. The Republican Committees deny that SB 1 “will have a chilling effect” on organizations that “employ paid canvassers and conduct GOTV activities.” Paragraph 298 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

299. The Republican Committees deny that SB 1 is unconstitutional. The statutes speak for themselves and do not require a response. Paragraph 299 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

300. The Republican Committees deny that SB 1 is unconstitutional. Paragraph 300 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

COUNT VIII

301. The Republican Committees incorporate their responses to the preceding paragraphs.

302. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees deny that SB 1 unlawfully infringes on the right to vote.

303. The statute speaks for itself and does not require a response. Paragraph 303 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

304. The statute speaks for itself and does not require a response. Paragraph 304 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

305. The Republican Committees deny that SB 1 is unconstitutional. The statute speaks for itself and does not require a response. Paragraph 305 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

306. The Republican Committees deny that SB 1 is unconstitutional. Paragraph 306 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

307. The statute speaks for itself and does not require a response. Paragraph 307 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

308. The statute speaks for itself and does not require a response. Paragraph 308 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

309. The Republican Committees deny that SB 1 is unconstitutional or that Plaintiffs are entitled to relief. Paragraph 309 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

COUNT IX

310. The Republican Committees incorporate their responses to the preceding paragraphs.

311. The Republican Committees admit that Plaintiffs purport to challenge certain amendments to the Texas Election Code enacted through SB 1. The Republican Committees deny that SB 1 unlawfully infringes on the right to vote.

312. The Republican Committees deny that SB 1 is unconstitutional. Paragraph 312 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

313. The Republican Committees deny that SB 1 is unconstitutional. Paragraph 313 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

314. The Republican Committees deny that SB 1 is unconstitutional or that Plaintiffs are entitled to relief. Paragraph 314 states legal conclusions and/or statements of what the law provides or should provide, to which no response is required. To the extent a response is required, these allegations are denied.

PRAYER FOR RELIEF

The Republican Committees deny that Plaintiffs are entitled to the relief requested.

AFFIRMATIVE AND OTHER DEFENSES

Without assuming the burden of proof, and while reserving the right to assert all applicable affirmative defenses supported in law and fact, the Republican Committees assert the following affirmative defenses:

FIRST AFFIRMATIVE DEFENSE

The Court lacks subject matter jurisdiction over Plaintiffs' claims.

SECOND AFFIRMATIVE DEFENSE

The Complaint fails to allege sufficient facts upon which a claim for relief may be granted.

THIRD AFFIRMATIVE DEFENSE

Plaintiffs lack standing to assert their claims in the Complaint.

FOURTH AFFIRMATIVE DEFENSE

Plaintiffs' claims are barred by the applicable statutes of limitations.

FIFTH AFFIRMATIVE DEFENSE

Plaintiffs' claims are barred by the equitable doctrines of laches, estoppel, unclean hands, and/or waiver.

SIXTH AFFIRMATIVE DEFENSE

Plaintiffs have failed to join indispensable parties to this action.

CONCLUSION

The Republican Committees respectfully request that the Court (1) dismiss Plaintiffs' claims with prejudice and enter judgment for Defendants; (2) deny Plaintiffs' prayer for relief; and (3) grant other such relief as the Court may deem proper.

May 11, 2022

Respectfully submitted,

/s/ John M. Gore

John M. Gore

E. Stewart Crosland*

Stephen J. Kenny*

Charles E.T. Roberts**

JONES DAY

51 Louisiana Avenue, N.W.

Washington, D.C. 20001

Phone: (202) 879-3939

Fax: (202) 626-1700

jmgore@jonesday.com

scrosland@jonesday.com

skenny@jonesday.com

cetroberts@jonesday.com

Counsel for Proposed Intervenor-Defendants

**Pro hac vice* applications forthcoming

**Application for admission to the Western

District of Texas pending

Admitted in Pennsylvania

Not admitted in D.C. (directly supervised by

John M. Gore, a licensed D.C. Bar member)