

No. \_\_\_\_\_

**IN THE SUPREME COURT OF TEXAS**

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IN RE RANYA KHANOYAN,	§
ALAN VERA, DAVID LUGO,	§
TOM S. RAMSEY AND	§
R. JACK CAGLE	§
	§
RELATORS.	§

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**RELATORS' EMERGENCY MOTION FOR EXPEDITED  
RELIEF**

TO THE HONORABLE SUPREME COURT JUSTICES:

COME NOW, IN RE RANYA KHANOYAN, ALAN VERA, DAVID LUGO, TOM S. RAMSEY AND R. JACK CAGLE, (hereinafter "Relators"), in the above-referenced matter and file this Emergency Motion for Expedited Relief and, as such, will show as follows:

1. Simultaneous to the filing of this Emergency Motion for Expedited Relief, Relator has filed an Emergency Petition for Writ of Mandamus.

2. In this case, Relators challenge the constitutionality and legality of the redistricting plan adopted by the Harris County Commissioner's Court on October 28, 2021, which reapportions voters among Harris County's four commissioner precincts (the "Ellis 3 Plan"). Under the plan which was under effect for the past decade (the "Benchmark Plan"), voters residing in Precincts 2 and 4 were

constitutionally entitled to vote for their candidates of choice in the next round of primary and general Harris County Commissioners Court elections in the Spring and Fall of 2022. By moving registered voters from even-numbered precincts into odd-numbered precincts, the Ellis 3 Plan illegally and unconstitutionally stripped those specific Harris County registered voters of their constitutionally protected right to vote under the Texas Constitution. More specifically, Relators claim that the Ellis 3 Plan not only abrogates Plaintiffs' constitutionally guaranteed right to vote, but it likewise destroys the voting rights of 1,125,937 innocent Harris County voters in total.

3. This emergency proceeding presents the question of whether Respondents clearly abused their discretion by enacting the Ellis 3 Plan and whether they should be ordered to stop implementation on the basis that it unconstitutionally strips the right to vote under Article I, Section 3 and Article VI, Section 2(a) of the Texas Constitution. More specifically, the Ellis 3 Plan strips 1,125,937 Harris County registered voters of their right to vote in the upcoming 2022 primary and general elections for the Harris County Commissioner elections for Precincts 2 and 4.

4. Because the primary election is set for March 1, 2021, and because ballots must be presented well in advance of that deadline, this Court must act swiftly. Because of the extreme urgency presented by these facts, Relators bring this

Emergency Motion for Expedited Relief to invalidate the Ellis 3 Plan and to stop the implementation of that plan for the upcoming round of 2022 elections for County Commissioner elections.

Respectfully Submitted,

BY: /s/ Andy Taylor

ANDY TAYLOR & ASSOCIATES, P.C.

Andy Taylor  
State Bar No. 19727600  
2628 Highway 36S, #288  
Brenham, Texas 77833  
713-222-1817 (telephone)  
713-222-1855 (facsimile)  
**ataylor@andytaylorlaw.com**

Joseph O. Slovacek  
State Bar No. 18512300  
Hoover Slovacek LLP  
5051 Westheimer, Suite 1200  
Houston, Texas 77056  
(713) 977-8686 Telephone  
(713) 977-5395 Facsimile  
slovacek@hooverslovacek.com

Chris Gober  
The Gober Group PLLC  
State Bar No. 24048499  
14425 Falconhead Blvd. E-100  
Suite 226  
Austin, TX 78738  
(512) 354-1783  
cg@gobergroup.com

ATTORNEYS FOR RELATORS  
RANYA KHANOYAN,  
ALAN VERA, DAVID LUGO,

TOM S. RAMSEY AND  
R. JACK CAGLE

CERTIFICATE OF SERVICE

By affixing my signature above, I, Andy Taylor, hereby certify that a true and correct copy of the above Emergency Motion for Expedited Relief has been delivered via the electronic filing system to the parties below on the 23rd day of December, 2021.

Chad W. Dunn  
Texas Bar No. 24036507  
K. Scott Brazil  
Texas Bar No. 02934050  
Brazil & Dunn  
4407 Bee Caves Road Building 1, Ste. 111  
Austin, TX 78746  
(512) 717-9822  
chad@brazilanddunn.com  
scott@brazilanddunn.com

Karla J. Aghedo  
State Bar Number: 24074359  
The Aghedo Firm PLLC  
405 Main Street, Suite 707  
Houston, TX 77002  
(903) 521-4837  
aghedolaw@gmail.com

Rolando O. Rios  
State Bar No. 1693590  
Rolando Rios & Associates, PLLC  
110 Broadway, Suite 335  
San Antonio, TX 78205  
(210) 222-2102  
rrios@rolandorioslaw.com