

IN THE
Supreme Court of the United States

GREG ABBOTT, *et al.*,

Applicants,

v.

LEAGUE OF UNITED LATIN AMERICAN CITIZENS, *et al.*,

Respondents.

ON APPLICATION FOR AN EMERGENCY STAY PENDING APPEAL

**BRIEF FOR *AMICI CURIAE* SIX TEXAS LOCAL
ELECTION OFFICIALS AND OFFICEHOLDERS
IN SUPPORT OF APPLICANTS**

GARRETT GREENE
Counsel of Record
NICK WANIC
LEIGH ANN O'NEILL
GINA D'ANDREA
ANDREW ZIMMITTI
AMERICA FIRST POLICY INSTITUTE
1455 Pennsylvania Avenue NW, Suite 225
Washington, DC 20004
(703) 637-3690
ggreene@americafirstpolicy.com

Counsel for Amici Curiae



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INTEREST OF *AMICI CURIAE*¹

Amici are six Texas local election officials and officeholders charged by state law with administering federal, state, and local elections on a day-to-day basis.² Several of the *amici* are responsible for implementing changes to their precincts at the behest of the State legislature. This includes preparing, programming, and printing ballots, providing required notices to candidates, voters, and the Secretary of State, managing polling places and election records, and ensuring that elections are conducted in compliance with Texas statutes and valid court orders. Other *amici* serve as presiding officers of commissioners courts and members of county election commissions, oversee election administration and ensure proper allocation of resources for conducting elections.

Before they “enter upon the duties of their offices,” *amici* swear to “preserve, protect, and defend the Constitution and laws of the United States and of this State.” Tex. Const. art. XVI, § 1. In discharging the duties of their office, *amici* must adhere to Texas’s voluminous elections code, under penalty of civil and criminal law.

Amici submit this brief to explain how the injunction, as written, is (1) legally incoherent under Texas’s anti-repealer statute; (2) impermissibly vague and internally inconsistent so that it is confusing; and (3) practically unworkable, forcing local officials to choose between violating Texas law—including criminal statutes—

¹ No counsel for a party authored this brief, in whole or in part, and no person or entity other than amicus curiae made a monetary contribution to the preparation or submission of the brief. Sup. Ct. R. 37.6.

² A full list of *amici* is attached as an appendix to this brief.

and risking contempt of court. The unique concerns of *amici* further support Applicants’ showing that a stay pending appeal is warranted.

SUMMARY OF ARGUMENT

The Court is familiar with the stay standard and with *Purcell*. *Amici* do not revisit the merits of the racial-gerrymandering claims or this Court’s decision in *Alexander*. Instead, they raise valid concerns grounded in the realities they face in administering elections. Essentially, as explained in more detail, below, the injunction leaves *amici* in the untenable position of having no viable congressional district map to follow as a matter of Texas law.

H.B.4 did more than adopt a new congressional map: Plan C2333; it repealed the 2021 map. But even more importantly, it repealed *all* prior law *and* court orders defining congressional districts. *See* H.B. 4, 89th Leg., 2d Spec. Sess., art. III, § 3(a). App. 182–84.³ (“[S]upersed[ing] all previous enactments or orders adopting congressional districts for the State of Texas.”). The separate repeal of old previous laws is crucial in this case because of Texas’s “anti-repealer statute.” App. 251. Under the statute, “[t]he repeal of a repealing statute does not revive the statute originally repealed.” Tex. Gov’t Code § 312.007. Accordingly, even if H.B.4—or just Plan C2333—were fully enjoined, the 2021 map cannot “spring back into life” as a matter of Texas law. App. 255. Yet the injunction somehow orders the State to “use the 2021 Map” without addressing HB 4’s repealing sections or § 312.007. *See generally* App. 1–160. For local election officials and officeholders who swore to follow “the laws of

³ All citations to “App.” reference the appendix submitted by Applicants.

this State,” there is now no coherent answer to a basic question: What map is actually law in Texas?

That ambiguity is compounded by the Orders’ silence with respect to many of Texas’s laws regarding election administration, which forces *amici* to navigate complex issues related to precinct changes and notice requirements without any meaningful instruction.

This creates a true no-win scenario for local election officials and officeholders, who now face conflicting commands backed by serious sanctions: civil and criminal penalties under Texas law and open-ended civil-contempt sanctions, including incarceration, from the District Court . *See* Tex. Elec. Code Ann. § 276.013(a)(3)(A)–(B) (West 2025); *Int’l Union, United Mine Workers of Am. v. Bagwell*, 512 U.S. 821, 828 (1994).

Because H.B.4 repealed the 2021 map and Texas law forbids revival of repealed statutes, *amici* are unable to advise voters, candidates, and fellow elections officials on the correct state of their districts and precincts.

The District Court’s preliminary-injunction order puts *amici* in an impossible position. They face irreparable harm and mass confusion: exposure to criminal prosecution, potential loss of office, and the threat of civil contempt for failing to comply with an order whose meaning is unclear and whose commands may be impossible to perform before critical deadlines. Those harms are independent of—and reinforce—the State’s showing under *Purcell* and the traditional stay factors. A stay is needed to restore a coherent legal framework for election administration.

ARGUMENT

I. The District Court Ordered Texas to Use a Map That No Longer Exists Under State Law.

A. H.B.4 repealed the 2021 map and abrogated prior law and orders.

The District Court recounts that Texas moved from its 2021 congressional map (Plan C2193) to a mid-decade 2025 map (Plan C2333), enacted through H.B.4 in 2025. App. 35–50. But H.B.4 did more than swap one set of lines for another. In addition to codifying Plan C2333, article III, § 3 of HB 4⁴ expressly repeals the prior statutory map and abrogates earlier enactments and court orders defining congressional districts. *Id.*; App. 245–46.

The District Court never meaningfully engaged with that repeal provision. Instead, it described the 2021 map as “already a viable congressional map that was drawn by the Legislature” and asserted that “reverting” to that map “will not preempt the Legislature’s authority to draw its congressional districts.” App. 159. That framing assumes away the key premise: the Legislature has already exercised that authority by repealing the 2021 map and replacing it with HB 4. *See Ayotte v. Planned Parenthood of N. New Eng.*, 546 U.S. 320, 330 (2006) (“[A] court cannot ‘use its remedial powers to circumvent the intent of the legislature.’”) (quoting *Califano v. Westcott*, 443 U.S. 76, 94 (1979) (Powell, J., concurring in part and dissenting in part)).

⁴ Relating to the composition of the districts for the election of members of the United States House of Representatives from the State of Texas, Tex. H.B. 4, 89th Leg. 2d Spec. Sess., Art.III § 3 (2025).

B. Texas’s anti-repealer statute prevents courts from reviving a repealed map.

Under Texas law, “[t]he repeal of a repealing statute does not revive the statute originally repealed.” Tex. Gov’t Code § 312.007. Congress has adopted an analogous rule for federal law. *See* 1 U.S.C. § 108. Judge Smith correctly notes that, under § 312.007, the 2021 maps cannot be “brought back from the dead” by the District Court’s enjoining of H.B.4. App. 255. Indeed, the District Court points to case where a previously enacted—but now repealed—redistricting map was reanimated by the enjoining of a bill. *Id.* To the contrary, courts that have struck down legal provisions as wholly unconstitutional have declined to resurrect prior versions of such laws that had already been abandoned by the Legislature and rendered obsolete *Cf. Murphy v. NCAA*, 584 U.S. 453 (2018) (holding that an entire federal statute on sports gambling was unconstitutional and neither reviving an earlier version of the statute nor declaring that previous statutory enactments return into effect).

The District Court’s preliminary relief does not declare H.B.4 void *ab initio*, it simply enjoins “the 2025 congressional map” and “ORDERS the State to use the 2021 Map, as it did in the 2022 and 2024 elections.” App. 160. But under Texas law, that command does not correspond to any existing statute.

Amici cannot resolve this conflict. They can, however, attest to its practical effect: there is no single, coherent set of statutory district boundaries that the clerks can honestly treat as “the. . . laws. . . of this State” to which they swore their oath to uphold. Tex. Const. art. XVI, § 1.

C. The District Court’s Injunction Forces Counties to Administer Elections Under a Court-Created Map Untethered to Any Texas Statute.

This Court has long emphasized that “[r]eapportionment is primarily a matter for legislative consideration and determination” and that courts should “not preempt the legislative task nor intrude upon state policy any more than necessary.” *White v. Weiser*, 412 U.S. 783, 794–95 (1973). To that end, courts must “follow the policies and preferences of the State . . . in the reapportionment plans proposed by the state legislature, whenever adherence to state policy does not detract from the requirements of the Federal Constitution.” *Id.* at 795.

The District Court did the opposite. Rather than give the Legislature any opportunity to enact a new map, it “ORDERS the State to use the 2021 Map”—a map the Legislature expressly repealed. App. 158–60, 295. In effect, the District Court has usurped the Legislature’s authority by installing a set of lines with no grounding in any operative Texas statute, resting solely on the court’s own injunction.

Amici are left in a true conundrum—how to comply with the injunction by conducting elections under lines drawn by the District Court but without meaning or existence in Texas law. Again, the District Court rendered such order without respect for H.B.4’s broad repeal: eliminating all previous enactments and orders adopting congressional districts. *See supra* at 4 (I.A).

The order thus forces county officials and officeholders—whose duties are defined by legislatively enacted maps and whose oaths run to the Constitution and the “*laws*” of both the United States and Texas—to administer elections under a plan

untethered to any Texas law whatsoever. *See* Tex. Const. art. XVI, § 1 (emphasis added).

The District Court’s instruction to “use the 2021 Map, as it did in the 2022 and 2024 elections,” App. 160, also does not solve this problem. Those elections were conducted after a full redistricting cycle in which counties had time to align precincts with the 2021 districts. *Amici* also had sufficient time to satisfy timing and notice requirements under Chapter 42 of Texas Election Code,⁵ and to coordinate with other jurisdictions whose districts are built between county election precincts. By contrast, counties have now spent “more than 75 days,” App. 246, implementing the 2025 map, including re-precincting where needed, updating polling-place plans, and programming equipment to reflect H.B. 4’s lines. Simply telling *amici* to administer the 2026 elections “as” the 2022 and 2024 elections were administered under the 2021 map ignores significant reliance interests and the practical reality that the logistical preconditions for those earlier elections cannot be recreated on this truncated timeline. In short, the injunction forces local officials to abandon the statutory framework they have already implemented and to conduct elections under a court-created plan that state law does not recognize.

These practical realities create an urgent and compelling case for a stay. Until this Court clarifies which map governs and on what legal basis, *amici* cannot perform their statutory duties. A stay is essential to avert mounting confusion and ensure

⁵ *See infra* at 10–13 (II.C).

that the 2026 elections proceed under a map that implements—rather than overrides—the Legislature’s will as the elected representatives of the people of Texas.

II. The Injunction is Completely Unworkable and Keeps Election Officials and Officeholders Guessing About What They Must Do and When.

A. The District Court Granted Four Motions for Preliminary Injunctions “As to Racial Gerrymandering” But Never Said What Specific Relief It Was Ordering.

At the end of its 160-page opinion, the District Court states:

For the foregoing reasons, the Court GRANTS the Plaintiff Groups’ motions for preliminary injunction as to their racial-gerrymandering claims. . . .

App. 160. It then lists four motions (NAACP, Green/Crockett, Gonzales, and Brooks/LULAC/MALC), adding:

The Court thereby ENJOINS the State of Texas from using the 2025 congressional map and ORDERS the State to use the 2021 Map, as it did in the 2022 and 2024 elections.

App. 159–60. The court expressly limits its ruling to Plaintiffs’ “racial-gerrymandering claims,” signaling that the motions are granted only in part. App. 160. But it never explains which requested remedies fall within that partial grant.

That omission matters because the plaintiffs asked for meaningfully different relief:

- The Green/Crockett intervenors moved to “enjoin the implementation of Texas Congressional redistricting Plan C2333” (the 2025 map). Dis. Ct. ECF No. 1143 at 1, 16.
- The Brooks, LULAC, and MALC plaintiffs asked the court to “issue a preliminary injunction against HB 4, in full,” including to “enjoin its repealer provision and therefore necessarily revive Plan C2193.” Dist. Ct. ECF No. 1150 at 43.
- The Gonzales plaintiffs sought to “preliminarily enjoin the use of HB 4’s districts and order Texas to continue to use the prior congressional districts for the 2026 election.” Dist. Ct. ECF No. 1149 at 27.

The District Court never says whether it enjoins Plan C2333 only, H.B.4 as a whole, or some hybrid. It also does not address the Brooks, LULAC, and MALC plaintiffs’ “revival” theory, which conflicts with § 312.007. And it gives county officials no guidance on whether HB 4’s timing and administrative provisions remain in force. This is precisely the sort of ambiguity that causes confusion close to an election, and why a stay of the District Court’s order is necessary.

B. The Vagueness of the District Court’s Order Only Sows Confusion Among Texas Election Officials and Officeholders.

At first blush, there are several unanswered questions presented by the District Court’s order:

- What acts are required? The order does not specify whether counties must restore their precinct boundaries “as they were in 2022 and 2024,” redraw precincts to follow the 2021 districts, or retain the precincts drawn for the 2025 map while merely reassigning congressional districts.
- How do statutory deadlines apply? The order never mentions the statutory timelines that govern “re-precincting” after redistricting, including the requirement that commissioners courts order precinct changes in a redistricting year “not later than October 1.” *See* Tex. Elec. Code Ann. §§ 42.031, 42.033 (West 2025).
- What about notice and coordination? The order is silent about the dense web of notice and coordination requirements in Subchapter B of Chapter 42—precisely the provisions that make last-minute changes so disruptive.

These unanswered questions are emblematic of the challenges *amici* face and why some have sought guidance and clarification from the Texas Secretary of State.⁶

⁶ For example, after the District Court issued its Order, *amici* Brenda Sanchez, County and District Clerk for Hudspeth County, sent a letter to the Secretary of State—the State’s “chief election officer,” Tex. Elec. Code Ann. § 31.001—on how to reconcile H.B. 4’s repeal of the 2021 maps, Tex. Gov’t Code § 312.007, and the injunction’s directive to conduct the 2026 election “under the 2021 map.” The difficulty in translating the injunction into concrete administrative directives underscores the complexity facing local election officials. If the

Without answers to these questions, and many others, Texas’s election officials and officeholders will find it difficult to protect themselves against the possible entry of a contempt citation on a decree too vague to be understood.⁷

C. The Order ignores Texas’s detailed precinct-change and notice requirements.

Chapter 42 does not just authorize precinct changes; it also dictates when they may occur and how they must be communicated to the people. For example, commissioners courts must review precinct boundaries in March or April of each odd-numbered year to ensure compliance with the precinct line and population rules and may order changes by May 1 of that year. *See* Tex. Elec. Code Ann. §§ 42.031–42.033 (West 2025). Outside that window, changes are permitted only for narrow

State’s chief election officer faces challenges in determining what the injunction requires, it is unreasonable to expect 254 county clerks—on pain of contempt on the one hand and potential felony liability on the other—to independently divine what the order requires for their precinct lines, ballot formats, and voter communications. A copy of the letter is included in the appendix attached to this brief.

⁷ Indeed, the District Court’s order is so vague that it likely violates Fed. R. Civ. P. 65(d)(1)—which requires every order granting an injunction must: “(A) state the reasons why it issued; (B) state its terms specifically; and (C) describe in reasonable detail—and *not by referring to the complaint or other document*—the act or acts restrained or required.” Fed. R. Civ. P. 65(d)(1) (emphasis added). This Court has stressed that these are not “mere technical requirements;” an injunction must function as a stand-alone directive that tells affected parties what they must do or refrain from doing. *See Schmidt v. Lessard*, 414 U.S. 473, 476 (1974). The entire point of Rule 65’s specificity requirements is to “prevent uncertainty and confusion on the part of those faced with injunctive orders, and to avoid the possible founding of a contempt citation on a decree too vague to be understood.” *Id.* at 476. Worse yet, the District Court’s injunction is internally inconsistent. As described above, the District Court’s order simultaneously “GRANTS” four different preliminary injunction motions “as to their racial gerrymandering claims”—without specifying which requested relief it grants, what portions of H.B.4 are enjoined, if any, or how its remedy interacts with H.B.4’s repeal of the 2021 maps. *See supra* at 8–9 (II.A).

reasons, such as aligning precincts with new districts or public-building lines or correcting population problems. *Id.*

When precinct changes are needed to implement legislative redistricting, they must be ordered “before October 1 of the year in which the redistricting is done.” *Id.* §§ 42.032. By the District Court’s order of November 18, that deadline had long since passed. The District Court’s order therefore requires counties to implement a different set of congressional districts on an expedited timeline that bears no relationship to the schedule Texas law prescribes. The candidate-filing period for the 2026 cycle has already opened, and candidates have begun filing, gathering signatures, and raising funds based on the 2025 map. *See generally* App. 144, 257–59, 289. Yet commissioners courts were required to order any precinct changes needed to implement redistricting “not later than October 1.” *See* Tex. Elec. Code Ann. § 42.032 (West 2025); *see also id.* §§ 42.031–.033. The injunction thus asks counties to undo and re-do precinct changes outside the narrow window the Legislature created for exactly that purpose, while simultaneously managing an active candidate-filing period keyed to a different map.

Once precinct lines change, commissioners courts must give notice to (1) the voter registrar, (2) the public, and (3) the Secretary of State, and large counties have additional notice duties. *Id.* §§ 42.034–.037. Local political subdivisions that later change their own boundaries must, in turn, notify the voter registrar within 30 days and provide a mapping-compatible description. *Id.* § 42.0615. Election-day

polling-place changes trigger still more notice obligations, including posting signs directing voters to the new locations. *See generally id.* §§ 4.003, 43.062.

These notice provisions are designed to ensure that voters, candidates, and other political subdivisions receive timely, accurate information about where they vote, which districts they inhabit, and how precinct changes affect their rights and obligations. They also presuppose that commissioners courts can plan precinct adjustments in advance, hold public meetings where required, generate the necessary mapping-compatible descriptions, and transmit them to the voter registrar and Secretary of State on a schedule the Code prescribes. The District Court’s order does not acknowledge that process, let alone explain how counties are supposed to compress into a few weeks the “re-precincting” process and notice procedures that ordinarily unfold over many months

Much of this work has already been done for the 2025 map. Counties have reviewed and, where necessary, redrawn precinct boundaries to conform to H.B. 4, transmitted new precinct descriptions to the voter registrar and Secretary of State, updated voter-registration databases and election-management systems, coordinated with cities, school districts, and other political subdivisions whose own districts are built from county precincts, and begun planning polling locations and ballot formats accordingly. To “re-precinct” the counties again to match the 2021 districts would require repeating each of those steps—new commissioners court action, new mapping and data work, new notices, new coordination with local jurisdictions, and new voter communications—on a timeline that Texas law neither contemplates nor permits.

Here, reasonable election officials could read the injunction in incompatible ways. One county might conclude that the Order enjoins only the congressional plan (Plan C2333), leaving H.B. 4’s precinct changes and other implementation provisions intact. Another might infer that the injunction sweeps more broadly—freezing all of H.B. 4, including its clause repealing the 2021 maps—and that the pre-2025 statutes somehow revive despite Tex. Gov’t Code § 312.007. A third might decide that, given the hard statutory deadlines for precinct adjustments and notice in Tex. Elec. Code Ann. §§ 42.031–42.034 (West 2025), the safest course is to make no changes at all and await clarification. Any of those approaches could later be deemed contemptuous by a court reading the injunction differently. In an election system built on statewide uniformity, that is untenable. Only a stay and clear guidance from this Court can prevent a patchwork of conflicting interpretations.

III. Texas Election Officials and Officeholders Could Face Criminal Liability for Failing to Follow State Law or Contempt for Disobeying the Injunction.

The Texas Election Code makes it an offense for a person knowingly to cause false information to be provided on an official election-related form or to an election official. § 276.013(a)(3)(A)–(B). These provisions apply directly to the routine work of county clerks—assigning voters to districts and precincts, advising candidates which district they reside in, preparing ballots, rosters, and pollbooks, and responding to questions from the Secretary of State and commissioners courts. For instance, if the 2021 maps were voided by the 2025 maps and cannot be revived under § 312.007, then telling a voter or candidate that he resides in “Congressional District X” under the 2021 map may be legally false information. But if the injunction is read to

invalidate the 2025 map and require immediate use of the 2021 map “as law,” then continuing to rely on H.B. 4’s districts may itself be treated as causing false information to appear on official documents. Because the injunction does not address § 312.007 or the status of the 2021 map, *amici* cannot reliably distinguish “true” from “false” election information for purposes of § 276.013.

At the same time, failure to follow the Order risks open-ended civil contempt. *See generally Int’l Union, United Mine Workers of Am.* at 828 (1994). If a county clerk or other officeholder, acting in good faith, concludes that she must continue to administer elections under H.B. 4 because the 2021 map cannot lawfully be revived, she risks being held in contempt for failing to “use the 2021 Map” as the injunction commands. *See App.* 160. If she instead attempts to implement the 2021 map, she risks later accusations that she knowingly caused false legal information to be provided on election documents.

The State’s stay motion below documented how the injunction “has thrown the State’s electoral system into immediate chaos.” *App.* 279. In that environment, missteps are inevitable. County clerks will field questions from candidates who filed under the 2025 map, from voters whose precincts have already been changed to implement H.B. 4, and from local jurisdictions whose own districts were keyed to congressional lines. Any mistaken answer risks later being characterized as “knowingly” causing false information to be provided.

Absent a stay from this Court, Texas election officials and officeholders are in a classic no-win scenario: violate Texas law and risk felony prosecution or violate a federal injunction and risk civil contempt.

Conclusion

“When an election is close at hand, the rules of the road must be clear and settled.” *Merrill v. Milligan*, 142 S. Ct. 879, 880–81 (2022) (Kavanaugh, J., concurring in grant of application for stays). The District Court’s injunction achieves neither, creating confusion rather than clarity and unsettling established procedures. Because the injunction is legally incoherent and unworkable for those charged with administering Texas elections, Texas’s application should be granted, and the case should be stayed pending appeal.

Respectfully submitted,

GARRETT GREENE
Counsel of Record
NICK WANIC
LEIGH ANN O’NEILL
GINA D’ANDREA
ANDREW ZIMMITTI
AMERICA FIRST POLICY INSTITUTE
1455 Pennsylvania Avenue NW, Suite 225
Washington, DC 20004
(703) 637-3690
ggreene@americafirstpolicy.com

Counsel for Amici Curiae

APPENDIX

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APPENDIX-A-LIST OF *AMICUS CURIAE* SIX TEXAS LOCAL
ELECTION OFFICIALS AND OFFICEHOLDERS

APPENDIX-B-NOVEMBER 23, 2025, LETTER FROM BRENDA
SANCHEZ, COUNTY & DISTRICT CLERK OF HUDSPETH COUNTY,
TO TEXAS SECRETARY OF STATE JANE NELSON

APPENDIX-A-List of *Amicus Curiae* Six Texas Local Election Officials and Officeholders

Brenda Sanchez
County and District Clerk, Hudspeth County

Mattie Martinez
County and District Clerk, McMullen County

Tim O'Hare
Chairman of the Tarrant County Election Commission, and Tarrant County Judge

Dwight Sullivan
County Clerk, Galveston County

Schelana Hock
County Clerk, Polk County

L. Brandon Steinmann
County Clerk, Montgomery County

**APPENDIX-B-November 23, 2025, Letter from Brenda Sanchez, County &
District Clerk of Hudspeth County, to Texas Secretary of State Jane
Nelson**



Brenda Sanchez
County & District Clerk
Hudspeth County

November 23, 2025

The Honorable Jane Nelson
Secretary of State of Texas
1019 Brazos Street
Austin, Texas 78701

Dear Secretary Nelson:

I am writing to respectfully request guidance from your office regarding how Texas County Clerks should lawfully proceed in light of the recent decision issued by the U.S. District Court for the Western District of Texas concerning the State's congressional maps.

As you know, before assuming office, every County Clerk in Texas takes an oath to "*preserve, protect, and defend the Constitution and laws of the United States and of this State.*" Tex. Const. art. XVI, § 1. That oath is my governing duty. It is also the standard by which I must evaluate any directive that affects the administration of elections in our county.

House Bill 4 repealed Texas's previous congressional map and enacted a new one. *See* HB 4, § 3(b). The Legislature went further still, explicitly abrogating *any* other laws or court orders that previously governed or affected Texas's congressional districting. *Id.* § 3(a). Under Texas law, therefore, there is only one valid set of congressional maps, and those maps form the legal foundation for every downstream component of the election process: candidate qualification, precinct alignment, ballot preparation, and all election administration duties carried out by County Clerks and Elections Administrators.

However, the District Court's recent 160-page decision and order issuing a preliminary injunction does not address, acknowledge, or reconcile the directive to "use the 2021 Map" with Texas's anti-repealer statute. Tex. Gov't Code § 312.007. As the dissenting opinion notes, Texas's anti-repealer statute means that "even if the act were enjoined or otherwise repealed, the repealed 2021 maps cannot spring back into life." *LULAC v. Abbott*, No. 3:21-CV-259 (W.D. Tex. 2025) (Smith, J., Dissenting). In other words, the operative order appears to require implementation of a set of maps that, as a matter of Texas law, no longer exists. At the same time, the order's directives are vague and incomplete, leaving large gaps that make compliance, in practice, impossible. The Court's order lacks specificity and the statutory deadlines for election administration, which are already underway, should be addressed.

This uncertainty places county clerks statewide in an untenable and legally perilous position. Without clear direction, we are forced into an impossible choice of violating Texas law or being held in contempt of court.

I cannot fulfill my oath without a clear, authoritative understanding of how to reconcile these conflicting directives. County clerks need immediate, uniform guidance from the Secretary of State to ensure that we conduct the upcoming election lawfully, consistently, and with the integrity the voters of Texas deserve.

Accordingly, I respectfully request that your office issue formal written guidance at the earliest possible opportunity. Specifically, county clerks need clear direction on how to reconcile HB 4's repeal of the 2021 maps with the District Court's injunction, particularly in light of Texas Government Code § 312.007's prohibition on reviving repealed statutes. We also need guidance on the legally proper steps to take as we continue preparing for upcoming election deadlines.

Thank you for your attention to this urgent matter and for your continued leadership in ensuring the orderly administration of Texas elections. I stand ready to assist in any way that would be helpful as your office evaluates these issues.

Respectfully,

A handwritten signature in black ink that reads "Brenda Sanchez". The signature is written in a cursive, flowing style.

Brenda Sanchez
County Clerk
Hudspeth County