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BROCK C. AKERS

BOARD CERTIFIED PERSONAL INJURY
AND CIVIL TRIAL LAW
TEXAS BOARD OF LEGAL SPECIALIZATION
CIVIL TRIAL ADVOCACY
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DIRECT DIAL
713/552-0232
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November 4, 2016

Via e-file

Blake A. Hawthorne, Clerk
The Supreme Court of Texas
P O 12248
Austin, Texas 78711

Re: King Street Patriots, et. al. v. Texas Democratic Party, No. 15-0320, In the Supreme
Court of Texas
Court of Appeals Number 03-12-00255-CV
Trial Court Number D-1-GN-11-002363

Dear Mr. Hawthorne:

Pursuant to the Court's instructions, I am filing the attached letter of August 8, 2011 that was sent on behalf of Petitioners, then Plaintiffs, to the Attorney General identifying the nature of the constitutional challenge we were raising, and continue to raise in our current Petition. I also took the liberty of sending the Attorney General a new letter and notice, and included a copy of the brief that we have filed with the Court where our challenges are more particularly outlined.

I believe that we had previously provided proper notice to the Attorney General, and now the update may be worthwhile as well. If you have any questions or need anything further from us, please let me know.

Sincerely,

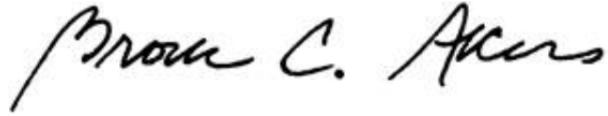


Brock C. Akers

Enclosures

CERTIFICATE OF SERVICE

I hereby certify that a true copy of the foregoing document has been served to all counsel of record in compliance with T.R.A.P. 9.5(d)(e) and served by the Court's Electronic Case Filing System on this 4th day of November, 2016.

A handwritten signature in black ink that reads "Brock C. Akers". The signature is written in a cursive, flowing style.

Brock C. Akers

LIBERTY INSTITUTE

August 8, 2011

VIA CERTIFIED MAIL, RETURN RECEIPT REQUESTED

The Honorable Greg Abbott
Office of the Attorney General
P.O. Box 12548
Austin, Texas 78711

Re: *King Street Patriots, et al v. Texas Democratic Party*, Cause Number D-1-GN-11-002363, in the 261st Judicial District of Travis County, Texas.

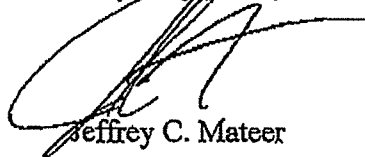
Dear General Abbott:

Please be advised that Plaintiffs are asserting constitutional claims challenging the constitutionality of certain provisions of the Texas Election Code in the above-referenced matter.

In that regard, for your convenience, please find enclosed copies of the parties' Rule 11 Agreement, Agreed Order Severing Certain Claims, and Defendants' Motion to Transfer Venue, and Subject Thereto, Motion for Severance, Plea to the Jurisdiction, Original Answer and Counterclaim, which sets forth Plaintiffs' constitutional claims in the counterclaim section of the pleading (pages 8-42). The constitutional claims are now being litigated in the above-referenced matter. Specifically, Plaintiffs are making a facial challenge to the constitutionality of several provisions of Titles 15 and 16 of the Texas Election Code, including sections 251.001(2), (3), (4), (5), (6), (7), (8), (9), (10), (12), (14), 253.031(c), 253.037(a)(1) and (b), 253.062, 253.094, 253.097, 253.104, 253.132, and 273.081.

If you require any additional information, please let me know.

Very truly yours,



Jeffrey C. Mateer

Enclosures

cc: Chad Dunn (*via facsimile w/o enclosures*)
Dickie Grigg (*via facsimile w/o enclosures*)
Mike Hull (*via facsimile w/o enclosures*)
James Bopp, Jr. (*via facsimile w/o enclosures*)
Brock Akers (*via facsimile w/o enclosures*)
Margaret Wilson (*via facsimile w/o enclosures*)

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e-mail: bca@akersfirm.com

November 4, 2016

The Honorable Ken Paxton
Attorney General for State of Texas
Office of the Attorney General
P.O. Box 12548
300 W. 15th Street
Austin, TX 78701

by Federal Express

Re: King Street Patriots, et. al. v. Texas Democratic Party, No. 15-0320, In the Supreme
Court of Texas

Dear General Paxton:

Please be advised that Petitioners/Plaintiffs in the above referenced matter are asserting constitutional claims challenging the constitutionality of certain provisions of the Texas Election Code. This matter was originally filed in the 261st Judicial District Court of Travis County. The rulings from the trial court were appealed to the Court of Appeals, and that decision has been appealed to the Texas Supreme Court, which has granted Petition. Oral arguments are scheduled for November 9, 2016.

A copy of the notice provided to the Office of the Attorney General at the time this matter was in its commencement stage is attached to this letter. We are also providing, for your convenience, a copy of the Brief on the Merits filed by Petitioners where the claims are fully discussed.

Specifically, Petitioners/Plaintiffs are making facial challenges to the constitutionality of several provisions of Titles 15 and 16 of the Texas Election Code.

If you require any additional information please let me know so we may comply.

Sincerely,



Brock C. Akers

Enclosures

cc: Chad Dunn
Dicky Grigg
Mike Hull
James Bopp, Jr.
Margaret Wilson
Jeffrey C. Mateer
(All without enclosure of brief)

Also copied: Blake A. Hawthorne, Clerk, Supreme Court of Texas (by electronic filing,
without enclosure of brief)