

**UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
VICTORIA DIVISION**

STATE OF TEXAS, et al.)	
)	
)	
Plaintiffs)	
v.)	No. 6:23-cv-00007
)	
DEPARTMENT OF HOMELAND)	
SECURITY., et al.)	
)	
Defendants)	
)	
and)	
)	
VALERIE LAVEUS, et al.)	
)	
Intervenors.)	

JOINT ADVISORY ON POST-TRIAL SUBMISSIONS

In response to the Court’s request at the conclusion of trial on August 25, 2023, the Parties present the following proposals for post-trial submissions. Plaintiffs and Federal Defendants propose the following schedule:

1. No later than September 29, 2023, the Parties shall file Proposed Findings of Fact and Conclusions of Law with citations to the record from trial. The Parties shall also file post-trial memoranda of law addressing the questions on which the Court requested further briefing at the conclusion of trial, and any other matter they may wish to address, no later than this date.
2. No later than October 27, 2023, the Parties shall file responses addressing any issues they may wish to address in any other Party’s Proposed Findings of Fact and Conclusions of Law, and any responses to the post-trial memoranda of law.

Intervenor Defendants propose the following schedule:

1. No later than September 29, 2023, the Parties shall file post-trial memoranda of law addressing the questions on which the Court requested further briefing at the conclusion of trial, and any other matter they may wish to address.
2. No later than October 13, 2023, the Parties shall file responses to the post-trial memoranda of law.
3. No later than October 27, 2023, the Parties shall file Proposed Findings of Fact and Conclusions of Law with citations to the record from trial.
4. No later than November 10, 2023, the Parties shall file responses addressing any issues they may wish to address in any other Party's Proposed Findings of Fact and Conclusions of Law, and any further responses to the post-trial memoranda of law.

Intervenor Defendants propose this schedule so that the Parties and the Court may benefit from more fulsome briefing on the questions posed by the Court at the conclusion of trial—including issues raised by Plaintiffs for the first time at or just before trial, such as the major questions doctrine and the scope of the requested remedy—before the Parties submit Proposed Findings of Fact and Conclusions of Law.

Dated: August 29, 2023

Respectfully submitted,

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