

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

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STATE OF TEXAS, *et al.*,

Plaintiffs,

v.

JOSEPH R. BIDEN JR., in his official  
capacity as President of the United States, *et al.*,

Defendants.

Civil Action No. 3:22-cv-00780-M

**JOINT NOTICE OF STIPULATIONS**

Plaintiff States, Federal Defendants, and Defendant-Intervenors (the “Parties”) adopt the following stipulations:

**Stipulation No. 1:** Subject to Stipulation No. 2, Plaintiffs stipulate that they will only seek to establish Article III injury based on alleged injuries to Texas and that they will not submit any evidence as to injury for any other State Plaintiff. Plaintiffs further stipulate that they will only seek to establish irreparable injury for purposes of any equitable relief based on alleged harm to Texas and that they will not submit any evidence as to irreparable harm for any other State Plaintiff. Subject to the limitations above, this stipulation does not prejudice the right of any Party to argue the proper scope of any relief or whether Article III standing is satisfied in this case. Federal Defendants stipulate that their currently propounded discovery requests are limited to Texas.

**Stipulation No. 2:** The Parties stipulate that Plaintiffs may not attempt to introduce new evidence of injury or irreparable harm to any State other than Texas absent new reciprocal discovery regarding injuries or harm to any such State for purposes of standing or scope of relief. This applies to any attempt by Plaintiffs to introduce such new evidence at any stage of this case, including after any remand should Plaintiffs prevail in district court but that decision is reversed by a higher court.

Dated: August 15, 2023

Respectfully submitted,

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**Certificate of Service**

I certify that a true and accurate copy of the foregoing document was filed and served electronically (via CM/ECF) on August 15, 2023.

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