

**IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
SHERMAN DIVISION**

STATE OF TEXAS,

Plaintiff,

PLANO CHAMBER OF COMMERCE, *et al.*,

Plaintiffs,

v.

U.S. DEPARTMENT OF LABOR, *et al.*,

Defendants.

Case No. 4:24-cv-499-SDJ  
(Lead Case)

Case No. 4:24-cv-468-SDJ

**JOINT PROPOSED BRIEFING SCHEDULE**

Pursuant to the Court's July 1, 2024 Order, ECF No. 40, the parties have conferred and submit the following:

Defendants will file a certified index of the administrative record by July 9, 2024.

Texas, Plano Chamber of Commerce, *et al.*, (the "Business Plaintiffs"), and Defendants jointly propose the following briefing schedule to resolve the claims presented in 4:24-cv-499 and 4:24-cv-468:

- 1) The Business Plaintiffs will file a motion for summary judgment by July 18, 2024;
- 2) Texas will file a motion for summary judgment by July 25, 2024;
- 3) Defendants will file an opposition and a cross motion by August 8, 2024;
- 4) Plaintiffs will file oppositions and replies by August 29, 2024;
- 5) Defendants will file a reply by September 19, 2024.

Date: July 8, 2024

**KEN PAXTON**  
Attorney General

**BRENT WEBSTER**  
First Assistant Attorney General

**RALPH MOLINA**  
Deputy Attorney General for Legal Strategy

**RYAN D. WALTERS**  
Chief, Special Litigation Division

Respectfully submitted.

/s/KATHLEEN T. HUNKER  
**KATHLEEN T. HUNKER**  
Special Counsel  
Tex. State Bar No. 24118415

**SUSANNA DOKUPIL**  
Special Counsel  
Tex. State Bar No. 24034419

**GARRETT GREENE**  
Special Counsel  
Tex. State Bar No. 24096217

**MUNERA AL-FUHAID**  
Special Counsel  
Tex. State Bar No. 24094501

OFFICE OF THE ATTORNEY GENERAL OF TEXAS  
Special Litigation Division  
P.O. Box 12548, Capitol Station  
Austin, Texas 78711-2548  
Tel.: (512) 463-2100  
Kathleen.Hunker@oag.texas.gov  
Susanna.Dokupil@oag.texas.gov  
Garrett.Greene@oag.texas.gov  
Munera.Al-fuhaid@oag.texas.gov

**COUNSEL FOR STATE OF TEXAS**

/s/ Robert F. Friedman  
Robert F. Friedman  
LITTLER MENDELSON, P.C.  
2001 Ross Avenue, Suite 1500  
Dallas, TX 75201  
(214) 880-8100  
(214) 880-8101 (Fax)  
rfriedman@littler.com

Maurice Baskin (pro hac vice)  
James A. Paretti, Jr. (pro hac vice)  
LITTLER MENDELSON, P.C.  
815 Connecticut Ave., N.W.  
Washington, D.C. 20006  
(202) 772-2526  
mbaskin@littler.com

Counsel for the Business Plaintiffs

BRIAN M. BOYNTON  
Principal Deputy Assistant Attorney General

JULIE STRAUS HARRIS  
Assistant Director, Federal Programs Branch

/s/ Brian Rosen-Shaud  
BRIAN C. ROSEN-SHAUD  
CHRISTINE L. COOGLE  
Trial Attorneys  
U.S. Department of Justice  
Civil Division, Federal Programs Branch  
1100 L. Street NW  
Washington, D.C. 20005  
(202) 305-7667  
brian.c.rosen-shaud@usdoj.gov

Counsel for Defendants