

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

LEAGUE OF UNITED LATIN  
AMERICAN CITIZENS, ET AL.

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vs.

CIVIL ACTION NO. 2:03-CV-354

RICK PERRY, GOVERNOR OF TEXAS  
ET.AL.

Consolidated

**AFFIDAVIT OF LUIS ROBERTO VERA, Jr.**

STATE OF TEXAS

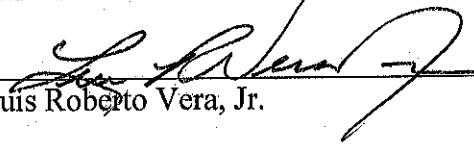
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COUNTY OF BEXAR

BEFORE ME, the undersigned Notary Public, on this day personally appeared,

Luis Roberto Vera, Jr., who being first duly sworn, deposed as stated, the following:

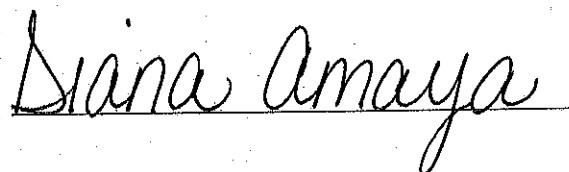
My name is Luis Roberto Vera, Jr. I am 50 years of age, of sound mind and capable of making this affidavit. I am an attorney licensed in Texas and several federal jurisdictions. I have been licensed since May 1992 and have extensive experience in federal court both at the district and appellate levels. I have been co-counsel or lead counsel on cases in the federal appeals courts and amicus counsel in the US Supreme Court. I am the National General Counsel for LULAC. To the best of my recollection and belief these time records reflect the time and effort I exerted in this case.

  
Luis Roberto Vera, Jr.

SUBSCRIBED TO AND SWORN TO BEFORE ME on this the 17 day of

August, 2006



  
Diana Amaya

Luis Roberto Vera, Jr.  
1325 Riverview Towers Building  
111 Soledad Street  
San Antonio, Texas 78205-2260

(210) 225-3300 office  
(210) 225-2060 facsimile

- PROFESSION: \* Attorney and Counselor at Law  
The Law Offices of Luis Roberto Vera, Jr. & Associates, P.C.  
\* Adjunct Professor of Political Science - St. Mary's University  
(San Antonio, Texas)
- EDUCATION: Western New England College School of Law (Massachusetts)  
Saint Mary's University - graduate studies in political science.  
Saint Mary's University - undergraduate studies in political science.
- PROFESSIONAL LICENSE: Licensed by the Supreme Court of Texas  
United States Court of Appeals (5<sup>th</sup> Circuit)  
Federal District Court (Western Dist. of Texas)  
Federal District Court (Southern Dist. of Texas)  
Pro-Hac Vice admittance in several states and fed. courts.
- PROFESSIONAL ASSOCIATIONS: American Bar Association  
National Association of Criminal Defense Lawyers  
Texas Association of Criminal Defense Lawyers  
Texas Trial Lawyers Association  
San Antonio Trial Lawyers Association  
Mexican American Bar Association  
College of the State Bar
- DIRECTORSHIPS: University Hospital System - Board of Managers  
Texas Air Life / San Antonio Air Life - Board of Directors  
Community First (HMO) - Board of Directors
- OTHER INTEREST: League of United Latin American Citizens - Council 4625, President.  
League of United Latin American Citizens - General Counsel  
National Association of Public Employees - founder

Mr. Vera is one of a handfull of lawyers litigating civil rights cases, pursuant to 42 USC §1983. This has earned Mr. Vera designations and honors in Texas and at the national level as an advocate and protector of civil rights. He has been named attorney of the year by the League of United Latin American Citizens (1998), received the Azteca Award for his work in civil rights at the national convention of LULAC in Washington, D.C. (2000), the Harlandale Independent School District Hall of Fame (2001), the Texas Diabetic Institute Wall of Honor (2002) and La Prensa Foundation (Hispanic Heritage Award 2004). Mr. Vera has been a guest speaker at High Schools, Universities, and organizations in and out of Texas. As general counsel for LULAC, Mr. Vera litigates education, discrimination, and civil rights issues throughout the country. St. Mary's University has honored Mr. Vera with induction into the President's and Adela societies. Upon his graduation from law school, Mr. Vera was awarded the Deans Award.

**LUIS ROBERT VERA, JR & ASSOCIATES  
ATTORNEYS AT LAW  
LULAC NATIONAL GENERAL COUNCIL  
111 SOLEDAD, SUITE 1325  
SAN ANTONIO, TX 78205-2260**

**TIME RECORDS FOR LUIS ROBERTO VERA, JR.  
LULAC v. PERRY ...et.al.**

<u>DATE</u>	<u>ACTIVITY</u>	<u>ATTY</u>	<u>TIME</u>
10-23-03	Confer with Jose Garza about representation, potential Problems with new cong. Red. Plan. Review data.	LRV	2.5
10-26-03	Confer with Orlando Rios; analysis of State plan	LRV	3.5
10-28-03	Confer with Orlando Rios; anaysis of State plan. Work of Section 5 pleadings.	LRV	2.5
10-29-03	Confer with Jose Garza re: meeting with DOJ.	LRV	.25
	Phone conference with Richard Gladden, Em; Andy Taylor; Jose Garza & Rolando Rios.	LRV	2.5
10-30-03	Meeting with Orlando Rios; analysis of State Plan.	LRV	3.25
10-31-03	Meeting with Orlando Rios; analysis of State Plan. Phone conference with co-counsel.	LRV	2.5
11-02-03	Confer with Rolando Rios on preparation for trial. Review complaint.	LRV	2.0
11-03-03	Confer with Rolando Rios, Jose Garza and George Corbell.	LRV	2.5
11-04-03	Confer with Rolando Rios and other co-counsel on strategy.	LRV	3.00
11-05-03	Confer with co-counsel on strategy; conference with the Dept. of Justice and reschedule meeting with DOJ for Nov. 21, 03; work on election charts; organize legal file and review State of Texas memo.	LRV	3.00
11-06-03	Meeting with all counsel; respond to Texas memo on procedures pending preclearance; phone conference	LRV	5.00

	with all counsel.		
11-07-03	Phone conference with all counsel.	LRV	.75
11-11-03	Phone conference with Rolando Rios regarding review of witness list; trial strategy and exhibits.	LRV	.75
	Review all documents, pleadings, exhibits to date.	LRV	2.5
11-16-03	Research recent decisions on Section 5 and Section 2 standards. Review expert reports from other parties.	LRV	3.00
11-19-03	Meeting with Rolando Rios; asst. prepare document for presentation to DOJ; asst. work on memo for DOJ finalize for DOJ comment and prepare and send out discovery; gis.	LRV	4.0
11-20-03	Preparation for meeting with DOJ. Travel to D.C. Assist Jose Garza with potential witnesses Margaret Gomez, (Austin) and Homero Ramirez (Laredo), interview and work with witness Jim Solis, and go over possible testimony of Hector Flores and Joe May, Review submission brief from State to DOJ. Asst. in Prepare statement for DOJ presentation.	LRV	9.00
11-21-03	Confer with DOJ officials and submit oral and written testimony; confer with clients and meet with press and LULAC staff at LULAC national office; Travel back to SA.	LRV	11.5
11-24-03	Trial Team Strategy Conference and phone conference with potential witnesses.	LRV	2.0
11-25-03	Reviewing trial briefs; pretrial orders; reviewing exhibits meetings with co-counsel and working / reviewing plans.	LRV	2.0
11-26-03	Reviewing trial briefs; pretrial orders; reviewing exhibits meetings with co-counsel and working / reviewing plans.	LRV	2.0
11-27-03	Reviewing trial briefs; pretrial orders; reviewing exhibits meetings with co-counsel and working / reviewing plans.	LRV	2.0
11-28-03	Reviewing trial briefs; pretrial orders; reviewing exhibits meetings with co-counsel and working / reviewing plans.	LRV	2.0
11-29-03	Reviewing trial briefs; pretrial orders; reviewing exhibits	LRV	2.0

	meetings with co-counsel and working / reviewing plans.		
12-01-03	Reviewing trial briefs; pretrial orders; reviewing exhibits meetings with co-counsel and working / reviewing plans.	LRV	2.0
12-02-03	Reviewing trial briefs; pretrial orders; reviewing exhibits meetings with co-counsel and working / reviewing plans.	LRV	2.0
12-03-03	Conference with counsel regarding trial strategy and review of work	LRV	2.5
12-04-03	Conference with counsel regarding trial strategy and review of work	LRV	2.5
12-05-03	Asst with research remedy questions and Section 2 redistricting issues. Review Holder, Voinavich, Section 5 cases, Beer and Lockhart.	LRV	5.0
12-07-03	Trial preparation. Review D's response to PI motion. Read and review Upham, Ketchum, Wesley v. Collins, Cromartie, Bossier Parish, Ashroft and Johnson. <del>Work on exhibits, make</del>	LRV	4.0
12-08-03	Review exhibits, suggest changes, ideas and travel to Austin to confer with all Plaintiffs counsel.	LRV	6.0
12-09-03	Attend Pre-Trial conference. Meet and confer with Plaintiffs' counsel trial presentation and presentation of Plaintiffs' dispositive motions. Asst in preparation for motions hearing.	LRV	6.0
12-10-03	Asst. in trial preparation. Review Upham district ct case, and remand. Review election dates, Monterrey, Clark, Branch v. Smith, Abrams, and Balderas. Asst. in outline of presentation.	LRV	4.0
12-11-03	Asst. in trial preparation, prepare outline of presentation, review Upham district court dec. review election date schedule. Trial.	LRV	4.0
12-12-03	Trial prep. Confer with counsel. Review state's trial brief.	LRV	9.0
12-13-03	Client meeting. Confer with LULAC state executive comm. confer with National President. Discuss status of case and status of DOJ review. Trial Prep.	LRV	4.0

12-14-03	Asst. with trial preparation.	LRV 3.0
12-15-03	Trial and trial preparation.	LRV 9.0
12-16-03	Trial and trial preparation.	LRV 9.0
12-17-03	Trial and trial preparaton.	LRV 9.0
12-19-03	Trial and trial preparation. Review pre-clearance letter. Confer with LULAC officers and co-counsel.	LRV 9.0
12-22-03	Confer with Rolando Rios reg. Final argument.	LRV 2.0
12-23-03	Prepare and asst in presenting final argument.	LRV 6.0
01-07-04	Review Court's order and confer with co-counsel.	LRV 1.25
1-12-04 To 8-01-04	Confer on work for appeal review briefs, confer with co-counsel and LULAC on status	LRV 20.0
10-25-04	Review Vieth, confer with co-counsel.	LRV 1.5
11-19-04	Reviw Vieth. Confer with co-counsel. Set up meeting with LULAC to discuss status, cost...etc.	LRV 1.5
11-23-04	Phone confer with Paul Smith, R. Rios, and Gerry Hebert and George Korbel, discuss positions of parties on remand and possible evidence relevant to remand.	LRV 1.5
11-29-04	Meeting with potential experts on areas to cover on remand.	LRV 1.0
12-01-04	Meeting with co-counsel. Asst in remand brief.	LRV 2.0
12-02-04	Asst in review trial record, district court's opinion. Confer with co-counsel on remand brief.	LRV 3.0
12-03-04	Asst on in draft of remand brief.	LRV 2.0
12-05-04	Confer as to revisions, change sections of brief.	LRV 2.0
12-06-04	Confer as to changes per George Korbel's suggestions, review estimates of pop by district for 2003 prepared by	LRV 2.0

George.

1-04-05.1	Confer with co-counsel on status of discussions with expert(s) on status of district by district pop. Analysis, discussion with R. Hicks on need to coordinate argument and with Nina Perales on MALDEF's position and argument.	LRV 2.0
1-05-05	Status report to LULAC.	LRV .5
1-06-05	Confer with co-counsel to review State's Initial Brief, review Travis County's brief, review law professors' brief, review Demo's and MALDEF brief etc.	LRV 2.0
1-12-06	Confer with co-counsel on final amended complaint; motion and order for same. Status of aff'd. and prep. for hearing next Friday.	LRV 2.0
1-12-07	Confer with co-counsel on final amended complaint; motion and order for same. Status of aff'd. and prep. for hearing next Friday.	LRV 2.0
1-19-05	Review state's initial brief and response brief; review Briefs filed by travis county and law prof. Prepare for hearing.	LRV 3.0
1-20-05	Conference and Prepare for oral argument with co-counsel regarding; Review Larios and Vieth, review population data for different districts, do moot ct with co-counsel, review state's opposition to motion to amend and to supplement the record. Review Rule 15b and cases on amendment post trial.	LRV 5.0
6-4-05	Begin review of post trial briefs filed by parties. Telephone calls with RR and JG.	LRV 2.5
6-5-05	Confer with co-counsel and LULAC on status of case.	LRV 1.5
6-9-05	Review district court's memorandum opinion; confer with LULAC and co-counsel. Discuss merits of potential appeal.	LRV 3.5
6-10-05	Conger with co-counsel regarding notice of appeal. Confer with LULAC.	LRV 1.5
6-27-05.1	Phone conference with RR and JG in regards to jurisdictional statement, Veith Review 2004 order,	LRV .75

trial exhibits and transcript of original trial.

6-28-06 and 6-29-06	Telephone conversations with JG and RR	LRV .50
6-30-05	Confer with co-counsel on issues and work	LRV 2.0.
7-02-05	Meet with LULAC leadership and delegates- update on status of appeal, issues involved etc.	LRV 3.0
7-12-05	Confer with RR and LULAC.	LRV 2.0
7-14-06 to 8-01-06	Various telephone conference regarding Juris Statement data, expert affidavits, appendix, cost issues, printing.	LRV 5.5
8-02-05.1	Confer with JG, GK and RR. review appendix, Section 2 issues.	LRV 2.5
8-03-05.1	Confer with counsel on Larios, impact districts, min. vote dilution.	LRV 1.5
8-04-05	Confer with RR on juris statement and modify issues.	LRV 2.0
8-05-05	Confer with JG regarding Balderas, modify statement of case to include Balderas findings.	LRV 1.0
8-07-05	Review juris state drafts.	LRV 2.0
8-08-05	Review juris state drafts.	LRV 2.0
8-09-05	Review juris state drafts.	LRV 2.0.
9-4-05 to 9-20-05	Review briefs, juris state filed by all plaintiffs.	LRV 10
12-05-05	Review DOJ memo on redistricting plan.	LRV 2.0
12-12-05	Confer with co-counsel and LULAC regarding status of case, discuss deadlines, schedules, press	LRV 2.0
12-14-05	Review JS of other parties to appeal. Asst research.	LRV 2.75
12-16-05	Phone conferece with co-counsel.	LRV .75
12-19-05	Phone conference wth co-counsel reg. argument	LRV 2.0

12-29-05	Confer with co-counsel on briefs, status, review.	LRV 2.0
12-30-05	Confer with co-counsel, brief, statement of issues.	LRV 1.0
1-02-06	Confer with counsel, review issues Larios, one person One vote.	LRV 2.0
1-03-06	Confer with counsel reg. revisions, review record at initial trial.	LRV 2.0
1-06-05.1	Review proofs, modify, confer with co-counsel and review relevant facts.	LRV 3.0
1-17-06	Review Jackson, Travis, and GI Forum briefs.	LRV 2
2-10-06	Review State's Brief, review U. S. brief.	LRV 2.75
2-10-06	Confer with co-counsel on reply brief issues.	LRV 1.25
2-15-06	Confer on reply brief, update and review.	LRV 1.0
2-16-06	Confer reply brief, issues raised by state. Review briefs – summarize State's position.	LRV 2.0
2-17-06	Phone conference with RR and LULAC, make Arrangements for DC trip,	LRV 1.0
2-18-06	Review final drafts of reply brief.	LRV 2.0
2-19-06	Review and comment on final draft reply brief.	LRV 2.0
to 2-20-06		
6-28-06	Review Court's decision, confer with clients and co- counsel	LRV 3
6-29-06	Begin research on potential remedy plan.	LRV 3
7-06-06.1	Confer with outside counsel for remedy research. Confer with GK negotiations with parties, discussions with LULAC. Continue research on potential remedy.	LRV 4.0
7-07-06	Confer with RR on status of meetings and negotiations.	LRV .25

7-10-06	Meet and confer on status of potential remedy plans. Make suggestions for modifications. Discuss strategy and logistics for negotiation meetings. Research.	LRV	2.0
7-11-06	Meet and confer with client and co-counsel, travel to Austin. Meeting with Tex. A. G. on possible areas of negotiation and compromise. Work with GK on mod. to potential remedy plans. Travel to San Antonio. Continue research.	LRV	7.75
7-16-06	Begin review of submissions by parties. Analysis of plans Submitted by parties to court.	LRV	4.0
7-17-06	Analyze Kennedy opinion and prepare charts on Compliance with plans.	LRV	4.0
7-18-06	Confer with counsel; update charts with plan data For use in briefs.	LRV	4.0
7-24-06.1	Review briefs of other parties for challenge. Submit Challenges to co-counsel.	LRV	2.0
7-28-06	Confer with GK on possible settlement plans. Work with RR on presentation.	LRV	1.0
8-01-06	Work with RR on presentation for remedy hearing.- Emphasize move Webb to 28 <sup>th</sup> , numbers in 23 <sup>rd</sup> with south bexar county, standards announced in Vera.etc.	LRV	2.0
8-03-05.2	Travel to Austin and back. Participate and assist in Hearing.	LRV	6.0
8-04-06	Review court order and plan. Confer with co-counsel and LULAC.	LRV	1.0
8-08-06.1 To 8-16-06	Work on fee application.	LRV	5.0

Total = 356.5 hours

I have submitted no expense record as most if not all my expenses were paid by LULAC and will be reflected in their reimbursement bill.