

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

MARANDA LYNN O'DONNELL,	§	
et al., on behalf of themselves and all	§	
others similarly situated,	§	
Plaintiffs,	§	
	§	CIVIL ACTION NO. H-16-1414
vs.	§	
	§	
HARRIS COUNTY, TEXAS, et al.,	§	
Defendants.	§	

**AMICI CURIAE HOUSTON AREA POLICE  
CHIEFS ASSOCIATION AND TEXAS SCHOOL DISTRICT  
POLICE CHIEF'S ASSOCIATION'S OPPOSED MOTION  
FOR ADDITIONAL TIME TO FILE AMICUS CURIAE BRIEFING**

TO THE HONORABLE JUDGE OF SAID COURT:

Amici, Houston Area Police Chiefs Association and Texas School District Police Chief's Association, request additional time, eleven days, to submit amicus curiae briefing regarding the proposed consent decree and settlement agreement.

**A. The Current Scheduling Order**

1. The Court, on August 8, 2019, entered an order resetting the fairness hearing to September 19, 2019 and setting the deadline for oppositions to August 22, 2019.

**B. The Amici Curiae**

2. The Houston Area Police Chiefs Association, a Texas nonprofit corporation, is an organization comprised of the chiefs of police of various Houston area law

enforcement agencies. Members also include command staff and line officers. The organization promotes public safety and law enforcement in the Houston area.

3. The Texas School District Police Chiefs' Association, a Texas nonprofit corporation, is an organization comprised of the chiefs of police of various educational institution law enforcement agencies, including public schools and public and private universities. The organization promotes public safety and law enforcement of educational institutions, including students and staff.

**C. Request for Additional time**

4. Amici recently became aware of the proposed consent decree and settlement. Amici have an interest in the terms of the consent decree and settlement because they will impact law enforcement and public safety. Amici, as organizations comprised of police chiefs and law enforcement officers, believe that they can offer the Court their unique law enforcement perspective. Amici request additional time so that they can consult with their membership and formulate a joint position. Amici request an additional eleven days, until Monday, September 2, 2019, to submit briefing.

**PRAYER**

WHEREFORE, PREMISES CONSIDERED, Amici, Houston Area Police Chiefs Association and Texas School District Police Chief's Association, request an

additional eleven days, until Monday, September 2, 2019, to file amicus curiae briefing.

Respectfully submitted,

STOGER LAW FIRM, P.C.

/s/ Jonathan S. Stoger  
JONATHAN S. STOGER  
Texas Bar No. 00797504  
Federal Bar No. 20715  
2301 Morse  
Houston, Texas 77019  
Tel: (713) 522-2848  
Fax: (713) 522-1120  
[jstoger@stogerlaw.com](mailto:jstoger@stogerlaw.com)

Attorneys for Amici Houston  
Area Police Chiefs Association  
and Texas School District  
Police Chief's Association

### CERTIFICATE OF CONFERENCE

This is to certify that on August 22, 2019 at 3:57 p.m., I emailed counsel for participants in this case. I was advised via email from attorney Neil S. Manne that Plaintiffs are **opposed** to this request. I also emailed Melissa L. Spinks (counsel for Harris County, Texas), G. Allen Van Fleet (counsel for Harris County Criminal Court Judges), and Murray Fogler (counsel for Sheriff Ed Gonzales). I have not yet received an email response, but given the pressing deadline and the opposition by Plaintiffs, Amici feel compelled to file this motion immediately.

/s/ Jonathan S. Stoger  
JONATHAN S. STOGER

**CERTIFICATE OF SERVICE**

I certify that on August 22, 2019, I electronically filed the foregoing with the Clerk of the Court for the United States District Court for the Southern District of Texas by using the CM/ECF System. Participants in the case will be served by the CM/ECF system. The undersigned is not aware of any participants who are not registered with the CM/ECF system.

*/s/ Jonathan S. Stoger*  
JONATHAN S. STOGER