

CAUSE NO. D-1-GN-11-003130

THE TEXAS TAXPAYER & STUDENT
FAIRNESS COALITION, et al;
CALHOUN COUNTY ISD, et al;
EDGEWOOD ISD, et al;
FORT BEND ISD, et al.,

Plaintiffs,

JOYCE COLEMAN, et al.,

Intervenors,

vs.

ROBERT SCOTT, COMMISSIONER
OF EDUCATION, IN HIS OFFICIAL
CAPACITY; SUSAN COMBS,
TEXAS COMPTROLLER OF PUBLIC
ACCOUNTS, IN HER OFFICIAL
CAPACITY; TEXAS STATE BOARD
OF EDUCATION,

Defendants.

IN THE DISTRICT COURT

TRAVIS COUNTY, TEXAS

250th JUDICIAL DISTRICT

AMENDED MOTION TO APPEAR PRO HAC VICE

I, Miguel A. Pérez Vargas, file this motion *pro hac vice* to appear before the court, under the authority of the Rules Governing Admission to the Bar of Texas, Rule XIX.

A. Facts

1. I am associated with David G. Hinojosa, who will personally participate in the trial of this case. David G. Hinojosa is a practicing attorney and a member of the State Bar of

Texas. His State Bar card number is 24010689 and his office address, telephone number, and fax number is: MALDEF, 110 Broadway, Suite 300, San Antonio, TX 78205, 210-224-5476, 210-224-5382.

2. I am an active member in good standing with the State Bar of Puerto Rico and the federal courts of the District of Puerto Rico and the Court of Appeals for the First Circuit.

3. I have not been the subject of disciplinary action in the last five years by the bar or courts of any jurisdiction in which I have been licensed.

4. I have not been denied admission to the courts of any state or to any federal courts during the last five years.

5. I am familiar with the State Bar Act, the State Bar Rules, and the Texas Disciplinary Rules of Professional Conduct governing conduct of members of the State Bar of Texas. I will at all times abide by and comply with those rules as long as this cause of action is pending, and I have not withdrawn as counsel from the proceeding.

6. The cases and causes in which I have appeared or sought leave to appear in Texas courts in the last two years are: None.

7. My office address, telephone number and fax number are indicated below my signature.

8. As Exhibits to the present motion I included a Non-Resident Acknowledgement Letter by the Board of Law Examiners of Texas and a Motion Requesting Approval of Pro Hac Vice Appearance by David G. Hinojosa as required by Rule XIX of the current *Rules Governing Admission to the Bar of Texas*.

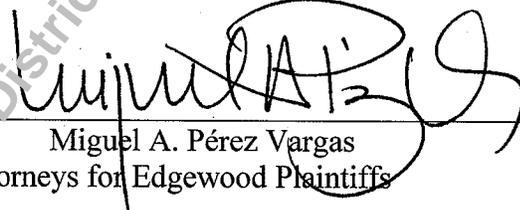
B. Prayer

8. For these reasons, I ask this court to grant my motion *pro hac vice* and allow me to appear before this court until the conclusion of this case.

DATED: November 6, 2012

Respectfully submitted,

Miguel A. Pérez Vargas
Supreme Court of PR No. 9578
META, Inc.
240 "A" Elm Street, Suite 22
Somerville MA 02144
617-628-2226
617-628-0322 Fax
perezvargasmiguel@gmail.com

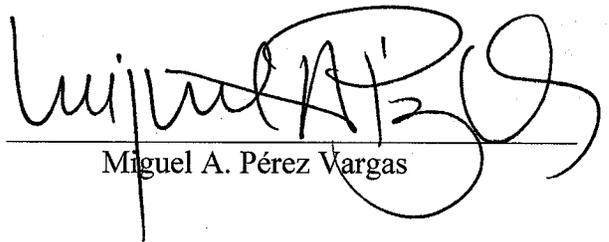
By: 

Miguel A. Pérez Vargas
Attorneys for Edgewood Plaintiffs

Sworn Statement

I, Miguel A. Perez Vargas, of legal age, attorney and resident of the State of Massachusetts, state under penalty of perjury that the statements contained in the present Motion are the truth and nothing but the truth.

On, Somerville, Massachusetts this 6th day of November, 2012.


Miguel A. Pérez Vargas

CERTIFICATE OF SERVICE

I certify that on November 8, 2012, I served the foregoing document via electronic mail

to all parties listed below:

GREG ABBOTT

Attorney General of Texas

DANIEL T. HODGE

First Assistant Attorney General

DAVID C. MATTAX

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ROBERT B. O'KEEFE

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Attorneys for Charter School Group

By: s/David G. Hinojosa
David G. Hinojosa

Unofficial copy Travis Co. District Clerk Velda L. Price

THE TEXAS TAXPAYER & STUDENT
FAIRNESS COALITION, et al;
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OF EDUCATION,

Defendants.

IN THE DISTRICT COURT

TRAVIS COUNTY, TEXAS

250th JUDICIAL DISTRICT

MOTION TO RECOMMEND APPROVAL OF PRO HAC VICE APPEARANCE

I, David G. Hinojosa file this motion as required by the Rules Governing Admission to the Bar of Texas, Rule XIX.

A. Facts

1. I, David G. Hinojosa, participate in the trial of this case on behalf of the Edgewood plaintiffs. My State Bar card number is 24010689 and my office address, telephone number, and fax number is: MALDEF, 110 Broadway, Suite 300, San Antonio, TX 78205, 210-224-5476, 210-224-5382 - fax.

2. Mr. Miguel A. Pérez Vargas is an active member in good standing with the State Bar of Puerto Rico and the U.S. Courts for the Districts of Puerto Rico and Colorado and the Court of Appeals for the First Circuit.

3. Mr. Pérez-Vargas has asked this Honorable Court to appear Pro Hac Vice as co-counsel for the Edgewood Plaintiffs in the present case.

4. As to best of my knowledge and belief I find Mr. Pérez-Vargas to be a reputable attorney and recommend that his Amended Motion to Appear Pro Hac Vice be GRANTED.

B. Prayer

8. For these reasons, I ask this court to grant Mr. Pérez-Vargas Amended Motion to Appear Pro Hac Vice and allow him to appear before this court until the conclusion of this case.

DATED: November 6, 2012

Respectfully submitted,

**Mexican American Legal Defense and
Educational Fund, Inc.**

David G. Hinojosa
State Bar No. 24010689
110 Broadway, Suite 300
San Antonio, Texas 78205
(210) 224-5476
(210) 224-5382 Fax

By: /s/David G. Hinojosa
David G. Hinojosa
Attorneys for Edgewood Plaintiffs

CERTIFICATE OF SERVICE

I certify that on November 8, 2012, I served the foregoing document via electronic mail

to all parties listed below:

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Attorneys for Charter School Group

By: s/David G. Hinojosa
David G. Hinojosa

Unofficial copy Travis Co. District Clerk Velda L. Price

Board of Law Examiners

Appointed by the Supreme Court of Texas

Non-Resident Acknowledgment Letter

November 05, 2012

MIGUEL A. PEREZ-VARGAS
MULTICULTURAL EDUCATION, TRAINING & ADVOCACY INC.
240 A ELM STREET SUITE 22
SOMERVILLE MA 02144-

Application Received: 12/05/12

Cause/Texas Court of Record: D-1-GN-11-003130 TRAVIS CO. 250TH JUDICIAL DISTRICT

FROM: Patty Bourgeois, Administrative Assistant, 512-463-8930

This letter acknowledges receipt of your Application for Pro Hac Vice admission and serves as your Proof of Payment of Fee.

Filing the Application for Pro Hac Vice Admission and fee is the mandatory first step in your request for permission to participate in proceedings in a Texas Court. The next step is to file a sworn motion, in compliance with Rule XIX of the current *Rules Governing Admission to the Bar of Texas*, in the Texas Court in which you request to participate, which must be accompanied by this acknowledgment letter. The decision to grant or deny your application is ultimately made by the Texas Court in which you request to participate.

Mailing Address

Post Office Box 13486
Austin, Texas 78711-3486

Telephone: 512-463-1621

Facsimile: 512-463-5300

WebSite: www.ble.state.tx.usStreet Address

205 West 14th Street, 5th Floor
Austin, Texas 78701