

Cause No. **2019CI18637**

**Patrick Von Dohlen; Brian Greco;
Kevin Jason Khattar; Michael
Knuffke; and Daniel Petri,**

Plaintiffs,

v.

**City of San Antonio and Paradies
Lagardère @ SAT LLC,**

Defendants

IN THE DISTRICT COURT

BEXAR COUNTY, TEXAS

438th JUDICIAL DISTRICT

**PLAINTIFFS' ORIGINAL PETITION AND
APPLICATION FOR TEMPORARY INJUNCTION**

The law of Texas prohibits governmental entities from taking “adverse action” against corporations based on their contributions to a religious organization. *See* Texas Gov’t Code § 2400.002. The City of San Antonio is violating this statutory command by excluding Chick-fil-A from the San Antonio airport on account of its donations to Christian organizations such as the Salvation Army and the Fellowship of Christian Athletes. The plaintiffs seek declaratory and injunctive relief against this unlawful and continuing exclusion of Chick-fil-A from the San Antonio airport.

DISCOVERY CONTROL PLAN

1. The plaintiffs intend to conduct discovery under Level 3 of the rules set forth in Rule 190 of the Texas Rules of Civil Procedure.

PARTIES

2. Plaintiff Patrick Von Dohlen resides in the city of San Antonio in Bexar County, Texas.

3. Plaintiff Brian Greco resides in the city of San Antonio in Bexar County, Texas.

4. Plaintiff Kevin Jason Khattar resides in Kendall County, Texas.

5. Plaintiff Michael Knuffke resides in Comal County, Texas.

6. Plaintiff Daniel Petri resides in the city of San Antonio in Bexar County, Texas.

7. Defendant the City of San Antonio is a home-rule municipality in Bexar County, Texas. It may be served with civil process by serving Leticia M. Vacek, City Clerk, at 114 West Commerce, San Antonio, Texas 78205. *See* Tex. Civ. Prac. & Rem. Code § 17.024(b); Charter of the City of San Antonio, Art. 2, § 10.

8. Defendant Paradies Lagardère @ SAT LLC (“Paradies Lagardère”) is a Texas limited liability company. Its headquarters are located at 2849 Paces Ferry Road, Overlook 1, Suite 400, Atlanta, Georgia, 30339. It may be served with civil process by serving Corporation Service Company, d/b/a CSC—Lawyers Incorporating Service Company, 211 East Seventh Street, Suite 620, Austin, Texas 78701.

JURISDICTION AND VENUE

9. The Court has subject-matter jurisdiction under the Texas Constitution, Article V, § 8, as the amount in controversy exceeds the minimum jurisdictional limits of the court exclusive of interest. The plaintiffs seek relief that can be granted by courts of law or equity.

10. The Court has jurisdiction over the plaintiffs’ request for declaratory and injunctive relief under section 2400.003 of the Texas Government Code because section 2400.004 of the Texas Government Code waives the city’s governmental immunity for such claims

11. Plaintiff Patrick Von Dohlen has standing to seek declaratory and injunctive relief because he uses the San Antonio airport for travel and would patronize Chick-fil-A if the city had not banned it from the airport. *See* Affidavit of Patrick Von Dohlen (attached as Exhibit 15).

12. Plaintiff Brian Greco has standing to seek declaratory and injunctive relief because he uses the San Antonio airport for travel and would patronize Chick-fil-A if

the city had not banned it from the airport. *See* Affidavit of Brian Greco (attached as Exhibit 16).

13. Plaintiff Kevin Jason Khattar has standing to seek declaratory and injunctive relief because he uses the San Antonio airport for travel and would patronize Chick-fil-A if the city had not banned it from the airport. *See* Affidavit of Kevin Jason Khattar (attached as Exhibit 17).

14. Plaintiff Michael Knuffke has standing to seek declaratory and injunctive relief because he uses the San Antonio airport for travel and would patronize Chick-fil-A if the city had not banned it from the airport. *See* Affidavit of Michael Knuffke (attached as Exhibit 18).

15. Plaintiff Daniel Petri has standing to seek declaratory and injunctive relief because he uses the San Antonio airport for travel and would patronize Chick-fil-A if the city had not banned it from the airport. *See* Affidavit of Daniel Petri (attached as Exhibit 19).

16. Although each of the plaintiffs is asserting a particularized injury that distinguishes them from the general public, there is no need for any of the plaintiffs to allege these injuries because section 2400.004 empowers any “person who alleges a violation of section 2400.002” to “sue the governmental entity for the relief provided under Section 2400.003.” *See* Tex. Gov’t Code § 2400.004 (“A person who alleges a violation of Section 2400.002 may sue the governmental entity for the relief provided under Section 2400.003.”). This statute confers standing on any person who alleges a violation of section 2400.002, and there is no need for a plaintiff to have suffered a particularized injury. *See, e.g., Andrade v. Venable*, 372 S.W.3d 134, 137 (Tex. 2012) (“Unless standing is conferred by statute, a plaintiff must show that he has suffered a particularized injury distinct from the general public.”); *see also Spence v. Fenchler*, 107 Tex. 443, 180 S.W. 597 (1915) (allowing private litigants to sue

under a statute conferred standing upon “any citizen” to bring an action to enjoin the operation of a bawdyhouse, without any need to show individualized injury).

17. The plaintiffs bring their claims exclusively under state law, and they disclaim any reliance on federal law or any federal cause of action.

18. The Court has personal jurisdiction over each of the defendants.

19. Venue is proper because a substantial portion of the events giving rise to the claims occurred in Bexar County, Texas. *See* Tex. Civ. Prac. & Rem. Code §§ 15.002, 15.003, 15.005, 15.035.

FACTUAL ALLEGATIONS

20. For years, liberal activists have been attacking Chick-fil-A because it gives money to Christian organizations that accept the Bible as the Word of God.

21. Because these Bible-believing Christian organizations derive their notions of morality from the Bible rather than modern-day cultural fads, they oppose homosexual behavior and same-sex marriage.

22. Chick-fil-A has long supported Bible-believing Christian organizations of this sort. In 2010, Chick-fil-A gave over \$8 million to the WinShape Foundation, a charitable organization run by the family of S. Truett Cathy, the founder of Chick-fil-A.¹ WinShape, in turn, has donated money to Bible-believing Christian organizations such as the Family Research Council, the Marriage & Family Foundation, and Exodus International.²

23. In 2011, activists began to publicly denounce Chick-fil-A and WinShape for donating to these Christian organizations. On March 22, 2011, an organization called Equality Matters published a report entitled, “Investigation Reveals Depth of Chick-

1. <https://pdf.guidestar.org/PDF/Images/2010/581/595/2010-581595471-07c2a7b1-F.pdf> (last visited on September 5, 2019).

2. *See* Clare O'Connor, *Meet The Cathys: Your Guide To The Billionaires Behind Chick-fil-A*, *Forbes* (Aug. 3, 2012), available at <https://www.forbes.com/sites/clareoconnor/2012/08/03/meet-the-cathys-your-guide-to-the-billionaires-behind-chick-fil-a/#23502faa33a7> (last visited on September 5, 2019).

Fil-A's Ties to Anti-Gay Causes." *See* Exhibit 1 (available at <http://equalitymatters.org/blog/201103220005#6>). The document criticized Chick-fil-A for donating to WinShape, and criticized WinShape for donating \$1.1 million to Bible-believing Christian organizations. The document specifically called out the following charitable contributions that WinShape made:

- \$631,600 to the National Christian Foundation
- \$480,000 to the Fellowship of Christian Athletes
- \$15,000 to Serving Marriages, Inc.
- \$5,000 to the Alliance Defense Fund
- \$5,000 Christian Camp and Conference Association
- \$2,850 to the Campus Crusade for Christ
- \$2,000 to the Georgia Family Council
- \$1,000 to the Family Research Council

See Exhibit 1.

24. The 2011 report from Equality Matters was publicized by left-wing blogs and news outlets, including the Huffington Post. *See* Exhibit 2 (available at https://www.huffpost.com/entry/chick-fil-a-donated-anti-gay-groups-2009_n_1069429).

25. On July 2, 2012, Equality Matters published another report criticizing Chick-fil-A and WinShape for charitable contributions made to Bible-believing Christian organizations in 2010. *See* Exhibit 3 (available at <http://equalitymatters.org/factcheck/201207020001> (last visited on September 5, 2019)). This time Equality Matters called out the following donations that WinShape made to Christian organizations:

- \$1,188,380 to the Marriage & Family Foundation
- \$480,000 to the Fellowship of Christian Athletes
- \$247,500 to the National Christian Foundation
- \$54,000 to the New Mexico Christian Foundation
- \$2,500 to the Georgia Family Council
- \$1,000 to Exodus International
- \$1,000 to the Family Research Council

See Exhibit 3.

26. This 2012 report from Equality Matters was propagated by left-wing news outlets such as The Advocate and the Huffington Post. *See* Exhibit 4 (available at <https://www.advocate.com/business/2012/07/02/chick-fil-donates-2-mil-antigay-groups> (last visited on September 5, 2019)); Exhibit 5 (available at https://www.huffpost.com/entry/chick-fil-a-anti-gay-group-donations_n_1644609 (last visited on September 5, 2019)).

27. In 2012, Dan T. Cathy, the chief operating officer of Chick-fil-A, publicly declared his opposition to same-sex marriage. On June 16, 2012, Mr. Cathy made the following statements on a radio show:

I think we are inviting God's judgment on our nation when we shake our fist at Him and say, "We know better than you as to what constitutes a marriage." I pray God's mercy on our generation that has such a prideful, arrogant attitude to think that we have the audacity to define what marriage is about.

28. On July 2, 2012, Biblical Recorder published an interview with Mr. Cathy in which he made the following remarks:

"We are very much supportive of the family—the biblical definition of the family unit. We are a family-owned business, a family-led business, and we are married to our first wives. We give God thanks for that. . . . We want to do anything we possibly can to strengthen families. We are very much committed to that," Cathy emphasized. "We intend to stay the course," he said. "We know that it might not be popular with everyone, but thank the Lord, we live in a country where we can share our values and operate on biblical principles."

29. Later in 2012, big-city mayors started threatening Chick-fil-A in response to its charitable donations and Mr. Cathy's comments. On July 12, 2012, Thomas Menino, the mayor of Boston, wrote to Mr. Cathy and threatened to ban Chick-fil-A from opening new stores in Boston:

I was angry to learn on the heels of your prejudiced statements about your search for a site to locate in Boston. There is no place for discrimination on Boston's Freedom Trail and no place for your company alongside it. When Massachusetts became the first state in the country

to recognize equal marriage rights, I personally stood on City Hall Plaza to greet same sex couples coming here to be married. It would be an insult to them and to our city's long history of expanding freedom to have a Chick-fil-A across the street from that spot.

See Exhibit 6.

30. On July 26, 2012, Ed Lee, the mayor of San Francisco, sent out a threatening tweet that said:

Closest #ChickFilA to San Francisco is 40 miles away & I strongly recommend that they not try to come any closer.

See Exhibit 7 (available at <https://twitter.com/mayoredlee/status/228635058636992512?lang=en> (last visited on September 5, 2019)).

31. On July 25, 2012, a Chicago alderman named Joe Moreno announced that he would exercise his “aldermanic privilege” to block Chick-fil-A from opening in the first ward. Then-mayor Rahm Emanuel backed the alderman’s stance, declaring that “Chick-fil-A values are not Chicago values,” and that “[t]hey disrespect our fellow neighbors and residents. This would be a bad investment, since it would be empty.” *See* Exhibit 8 (available at <https://www.chicagotribune.com/business/ct-met-chicago-chick-fil-a-20120725-story.html> (last visited on September 5, 2019)).

32. The threats had their desired effect, for the most part. In response to Alderman Moreno’s threat, Chick-fil-A wrote the alderman a letter promising that WinShape “is now taking a much closer look at the organizations it considers helping, and in that process will remain true to its stated philosophy of not supporting organizations with political agendas.” Kim Severson, *Chick-fil-A and Chicago Alderman Reach Agreement*, N.Y. Times (Sept. 19, 2012) (available at <https://www.nytimes.com/2012/09/20/us/chick-fil-a-and-chicago-alderman-reach-agreement.html> (last visited on September 5, 2019)) (attached as Exhibit 9). WinShape also dropped its financial support of Focus on the Family and Exodus International. *See id.* Chick-fil-A also issued a statement announcing that Mr. Cathy and company officials would no

longer opine on the issue of same-sex marriage, stating: “[G]oing forward, our intent is to leave the policy debate over same-sex marriage to the government and political arena.” *See id.*

33. But these changes haven’t been enough to satisfy the most militant of the anti-Chick-fil-A activists, because WinShape continues to support the Salvation Army and the Fellowship of Christian Athletes. On March 3, 2014, a story in “QNotes” noted with approval that Chick-fil-A and WinShape had ceased their financial support of the Marriage & Family Foundation, the National Christian Foundation, Family Research Council, and Exodus International. *See* Exhibit 10 (available at <https://goqnotes.com/27860/new-chick-fil-a-filings-show-decrease-in-anti-lgbt-funding> (last visited on September 5, 2019)). But the story nevertheless observed:

Only one arguably anti-LGBT group remains, the Fellowship of Christian Athletes, which holds some anti-LGBT leadership policies and religious doctrines. But, that group received just \$25,390 in 2012, down from nearly a half-million dollars in funds it received in 2010.

See id.

34. On July 6, 2017, a story in Think Progress criticized Chick-fil-A and WinShape for their 2015 donations to the Salvation Army and the Fellowship of Christian Athletes. *See* Exhibit 11 (available at <https://thinkprogress.org/chick-fil-a-still-anti-gay-970f079bf85> (last visited on September 5, 2019)).

35. On March 20, 2019, another story in ThinkProgress denounced Chick-fil-A and WinShape for their 2017 donations to the Salvation Army and the Fellowship of Christian Athletes. *See* Exhibit 13 (available at <https://thinkprogress.org/chick-fil-a-anti-lgbtq-donations-tax-filings-62ca15281f17> (last visited on September 5, 2019)). According to this report, which analyzed the foundation’s tax filings:

The donations—\$1,653,416 to the Fellowship of Christian Athletes, \$6,000 to the Paul Anderson Youth Home, and \$150,000 to the Salvation Army—actually represent a slight increase from the previous

year. The foundation's funding comes almost entirely from the corporate treasury and shares leadership with the company.

The Fellowship of Christian Athletes is a religious organization that seeks to spread an anti-LGBTQ message to college athletes and requires a strict "sexual purity" policy for its employees that bars any "homosexual acts." Paul Anderson Youth Home, a "Christian residential home for trouble youth," teaches boys that homosexuality is wrong and that same-sex marriage is "rage against Jesus Christ and His values."

The Salvation Army has a long record of opposing legal protections for LGBTQ Americans and at the time of the donations had a written policy of merely complying with local "relevant employment laws." The organization's website has since changed to indicate a national policy of non-discrimination based on sexual orientation and gender identity.

See Exhibit 11.

36. The 2019 report from ThinkProgress was picked up by many other news outlets, including Fox News, Vox, Business Insider, and the Huffington Post.

37. Chick-fil-A continues to defend WinShape's donations to the Salvation Army and the Fellowship of Christian Athletes in response to this recent criticism. *See* Kate Taylor, *For Chick-fil-A, impact trumps 'any political or cultural war' when it comes to controversial donations*, Business Insider (May 15, 2019) (available at <https://www.businessinsider.com/chick-fil-a-explains-donations-groups-considered-anti-gay-2019-5> (last visited on September 5, 2019)) (attached as Exhibit 14).

38. On March 21, 2019, the City Council of San Antonio considered whether to approve an agreement that would allow Paradies Lagardère to operate concessions in the San Antonio airport. *See* Exhibit 14 (available at <https://sanantonio.legistar.com/View.ashx?M=M&ID=671873&GUID=C5EEC666-2EA5-45EF-8FA5-91C9A3121181> (last visited on September 5, 2019)). Under the terms of this agreement, Paradies Lagardère would install a Chick-fil-A restaurant in a 985-square-foot space across from Gate A6.

39. At the meeting, Councilmember Roberto C. Treviño announced that he wanted Chick-fil-A banned from the San Antonio airport and read aloud the following prepared statement:

The inclusion of Chick-fil-A as a national brand tenant is something I cannot support. The heart of the LGBTQ community is in District One and the community has come together to voice its disapproval of this proposal because it includes a company with a legacy of anti-LGBTQ behavior. The work our city has done to become a champion of equality and inclusion should not be undone so easily, which is why I cannot support the staff recommendation today. Perhaps the Office of Equity and Inclusion should be involved in the vetting of economic deals to ensure they align with our core values as a city. I therefore move to approve staff recommendation with the following amendment: Directing staff to work with the concessionaire to secure another concept other than Chick-fil-A consistent with the requirements of the RFP, which will not change the MAG and will not decrease the percentage rent.

City Council A Session Video, Mar. 21, 2019, at 3:53:25, at <https://sanantoniotx.new.swagit.com/videos/26748> (last visited on September 5, 2019).

40. Councilmember Treviño then moved to approve the agreement with Paradies Lagardère, but with an amendment would direct the city's staff to work with Paradies Lagardère in replacing Chick-fil-A with another vendor. *See* Exhibit 14, page 17 (available at <https://sanantonio.legistar.com/View.ashx?M=M&ID=671873&GUID=C5EEC666-2EA5-45EF-8FA5-91C9A3121181> (last visited on September 5, 2019)).

41. Councilmember Manny Pelaez seconded Treviño's motion, and explicitly stated that he wanted Chick-fil-A banned from the airport because of its donations to certain religious organizations that oppose homosexual behavior:

Let me tell you why I seconded this motion. For many years, Chick-fil-A corporate has been funding anti-LGBTQ organizations . . . I also think it would be abhorrent and a violation of my conscience and certainly a violation of the city's values, if we help, by bringing in a restaurant like that, if we help them fund those efforts, by making

money off of our airport. And if we've got a choice by indirectly helping fund efforts to continue conversion therapy or continue discriminating against people and really just harming fellow human beings, then I will always choose on the side of trying to not enable that. And that's all this does. It would enable that.

City Council A Session Video, Mar. 21, 2019, at 4:54:45, at <https://sanantoniotx.new.swagit.com/videos/26748> (last visited on September 5, 2019).

42. Later in his remarks, Councilmember Pelaez stated that Chick-fil-A should be banned from the San Antonio airport because some people regard Chick-fil-A as a “symbol of hate.”

I want to make to sure that when people traverse our airport, the first thing that they see is a San Antonio that is welcoming, and that they not see a symbol that for many people is a symbol of hate.

City Council A Session Video, Mar. 21, 2019, at 4:56:35, at <https://sanantoniotx.new.swagit.com/videos/26748> (last visited on September 5, 2019).

43. Councilmember Pelaez also said that he wanted Chick-fil-A banned from the San Antonio airport because it is closed on Sundays:

I don't want a restaurant that isn't available on Sundays either. I don't care why it is that they're not open on Sundays, but I want to make sure that every single one of our guests gets the full panoply of items available to them on every day of the week, including Sundays.

City Council A Session Video, Mar. 21, 2019, at 4:57:13, at <https://sanantoniotx.new.swagit.com/videos/26748> (last visited on September 5, 2019).

44. Finally, Councilmember Pelaez said:

[I]f Chick-fil-A wants to make people feel unwelcome, they're certainly welcome to do that at their own restaurants, just not in my airport and my constituents' airport.

City Council A Session Video, Mar. 21, 2019, at 4:58:49, at <https://sanantoniotx.new.swagit.com/videos/26748> (last visited on September 5, 2019). Councilmember Pelaez never explained how Chick-fil-A “makes people feel unwelcome,” apart from its donations to Christian organizations that disapprove of homosexual behavior.

45. Several members of the City Council spoke in opposition to Treviño and Pelaez's efforts to ban Chick-fil-A from the airport. Councilmember Courage said:

I just am concerned that if we start picking and choosing based on social issues, does that mean we don't want to have a certain health group go into the medical center? Or we don't want to rent a space to a business on the river walk because of what their owner has done in the past? Or are we not going to go ahead and allow a building to be rezoned or something because it's going to be housed by atheists or humanists or agnostics or whatever? I think that is going down a very wrong path for the city council to take. So I'm going to reiterate my opposition to his motion and I just hope that the other council members will give that their consideration too.

City Council A Session Video, Mar. 21, 2019, at 5:22:38, at <https://sanantoniotx.new.swagit.com/videos/26748> (last visited on September 5, 2019).

46. Councilmember Perry also opposed the Chick-fil-A ban:

I want to echo those same exact words from Councilmember Courage. I think this is the wrong thing to do at this point in the process.

City Council A Session Video, Mar. 21, 2019, at 5:23:33, at <https://sanantoniotx.new.swagit.com/videos/26748> (last visited on September 5, 2019).

47. After these remarks, the council voted 6-4, with one abstention, to approve the contract with Councilmember Treviño's amendment to ban Chick-fil-A from the airport. *See* Exhibit 14.

CAUSE OF ACTION

48. Section 2400.002 of the Texas Government Code provides:

Notwithstanding any other law, a governmental entity may not take any adverse action against any person based wholly or partly on the person's membership in, affiliation with, or contribution, donation, or other support provided to a religious organization.

49. The city of San Antonio is violating section 2400.002 by banning Chick-fil-A from its airport. The city's continued exclusion of Chick-fil-A is based "wholly or partly" on Chick-fil-A's past and present contributions, donations, and support for

certain religious organizations, including the Salvation Army and the Fellowship of Christian Athletes, which it provides through its WinShape, its charitable foundation.

50. Section 2400.004 of the Texas Government Code abrogates the city's governmental immunity and permits "any person who alleges a violation of section 2400.002" to "sue the governmental entity for the relief provided under Section 2400.003." *See* Tex. Gov't Code § 2400.004 ("A person who alleges a violation of Section 2400.002 may sue the governmental entity for the relief provided under Section 2400.003.").

51. Each of the plaintiffs has standing to sue the city over its decision to ban Chick-fil-A from the San Antonio airport because they use the San Antonio airport for travel and would patronize Chick-fil-A at the airport if it were allowed to operate there. This particularized injury distinguishes the plaintiffs from the general public.

52. Even if the plaintiffs lacked a particularized injury, they would have statutory standing to sue the city under section 2400.004, which empowers "a person who alleges a violation of section 2400.002" to "sue the governmental entity for the relief provided under Section 2400.003." Tex. Gov't Code § 2400.004. Section 2400.004 confers standing on any person who alleges a violation of section 2400.002, without regard to whether that plaintiff has suffered a particularized injury.

53. The plaintiffs bring suit under the cause of action established in section 2400.004, and they seek declaratory and injunctive relief, along with court costs and attorneys' fees, under section 2400.003.

54. Because Paradies Lagardère is implementing the city's instructions to exclude Chick-fil-A from the San Antonio airport, it should be joined as a party under Rule 39 of the Texas Rules of Civil Procedure.

GROUND FOR TEMPORARY INJUNCTION

55. To obtain a temporary injunction, an applicant must plead and prove: “(1) a cause of action against the defendant; (2) a probable right to the relief sought; and (3) a probable, imminent, and irreparable injury in the interim.” *Butnaru v. Ford Motor Co.*, 284 S.W.3d 198, 205 (Tex. 2002).

56. Section 2400.004 of the Texas Government Code provides a cause of action against the city of San Antonio. Paradies Lagardère is joined under Rule 39 as a party needed for just adjudication.

57. The plaintiffs have a probable right to relief because Councilmember Treviño and Pelaez’s statements show that the city’s exclusion of Chick-fil-A from the San Antonio airport is at least “partly” based on Chick-fil-A’s donations to a religious organization.

58. The plaintiffs will suffer probable, imminent, and irreparable injury absent a temporary injunction.

DEMAND FOR JUDGMENT

The plaintiffs demand the following relief:

- a. a declaration that the city of San Antonio violated and continues to violate section 2400.002 of the Texas Government Code by banning Chick-fil-A from the San Antonio airport;
- b. a temporary and permanent injunction that prevents the city and Paradies Lagardère from excluding Chick-fil-A from the San Antonio airport;
- c. a temporary and permanent injunction that compels the city and Paradies Lagardère to install a Chick-fil-A restaurant in the San Antonio airport, consistent with the proposal submitted by Paradies Lagardère before the Treviño amendment;
- d. a temporary and permanent injunction that prohibits the city from taking any adverse action against Chick-fil-A or any other person or entity, which is based wholly or partly on that person or entity’s support for religious organizations that oppose homosexual behavior;

- e. all costs of suit and reasonable attorneys' fees; and
- f. all other relief that this Court deems appropriate.

Respectfully submitted.

H. DUSTIN FILLMORE III
Texas Bar No. 06996010
CHARLES W. FILLMORE
Texas Bar No. 00785861
The Fillmore Law Firm, LLP
1200 Summit Avenue, Suite 860
Fort Worth, Texas 76102
(817) 332-2351 (phone)
(817) 870-1859 (fax)
dusty@fillmorefirm.com
chad@fillmorefirm.com

/s/ Jonathan F. Mitchell
JONATHAN F. MITCHELL
Texas Bar No. 24075463
Mitchell Law PLLC
111 Congress Avenue, Suite 400
Austin, Texas 78701
(512) 686-3940 (phone)
(512) 686-3941 (fax)
jonathan@mitchell.law

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Counsel for Plaintiffs