

Atty. Gen.

JUL 27 2023

CLERK OF THE COURT

THE SENATE OF THE STATE OF TEXAS  
SITTING AS A HIGH COURT OF IMPEACHMENT

IN THE MATTER OF §  
WARREN KENNETH §  
PAXTON, JR. §

HOUSE MANAGERS' NOTICE REGARDING  
WARREN KENNETH PAXTON JR.'S  
MOTION TO QUASH AND REQUEST FOR BILL OF PARTICULARS

To the Honorable Dan Patrick:

The Texas House of Representatives Board of Managers (“House Managers”) are in receipt of Kenneth Warren Paxton Jr.’s Motion to Quash and Request for a Bill of Particulars (“Motion and Request”). The House Managers oppose the Motion and Request. Mr. Paxton is wrong in equating the impeachment to a criminal proceeding and invoking criminal procedures in this forum,<sup>1</sup> And he is wrong in professing puzzlement over the charges against him.<sup>2</sup>

As previously stated, the House Managers have an expectation that all pre-trial motions and responses will be considered according to the time frames set forth in Rule 15. Unless the Senate instructs otherwise, the House Managers will fully respond to the Motion and Request no later than August 15, 2023.

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<sup>1</sup> See *Ferguson v. Maddox*, 114 Tex. 85, 97, 263 S.W. 888, 892 (1924); *Ferguson v. Wilcox*, 119 Tex. 280, 301, 28 S.W.2d 526, 536 (Tex. 1930); TEX. CONST. Art. XV, § 4; *Mecham v. Gordon*, 156 Ariz. 297, 303 (Ariz. 1988); *Hastings v. United States Senate*, 716 F. Supp. 38, 41 (D.D.C. 1989), *aff’d mem. on other grounds*, 887 F.2d 332 (D.C. Cir. 1989).

<sup>2</sup> See, e.g., Transcript from House Impeachment Proceedings, dated May 27, 2023; Transcript from House General Investigating Committee hearing, dated May 24, 2023; See OAG’s original response to former employees’ lawsuit against Mr. Paxton for abuses of office; Lewis Brisbois report regarding former employees’ lawsuit, dated May 24, 2023.

Respectfully submitted,



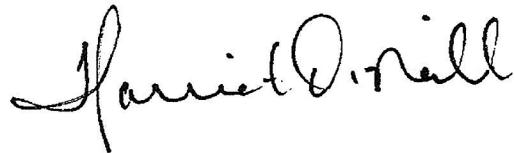
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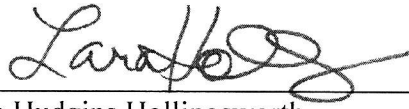
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**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing was served on the following counsel  
for Paxton on July 26, 2023:

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