

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

BAY AREA UNITARIAN)
UNIVERSALIST CHURCH; DRINK)
HOUSTON BETTER, LLC d/b/a)
ANTIDOTE COFFEE; PERK YOU)
LATER, LLC,)

Plaintiffs,

v.

CIVIL ACTION NO. 4:20-cv-03081

KEN PAXTON, Attorney General for the)
State of Texas, in his official capacity; KIM)
OGG, District Attorney for Harris County, in)
her official capacity; CHRISTIAN)
MENEFEE, County Attorney for Harris)
County, in his official capacity; ED)
GONZALEZ, County Sheriff for Harris)
County, in his official capacity; PETE)
BACON, Acting Chief of Police for the)
Webster Police Department, in his official)
capacity; TROY FINNER, Chief of the)
Houston Police Department, in his official)
capacity; KIM LEMAUX, Presiding Officer)
for the Texas Commission on Law)
Enforcement, in her official capacity,

Defendants.

DECLARATION OF WILLIAM R. TAYLOR, ESQ.

I, William R. Taylor, declare that I am over the age of eighteen years and of sound mind to make this declaration. I have personal knowledge of the facts set forth below. If called as a witness, I could and would testify to the statements and facts contained herein, all of which are true and accurate to the best of my knowledge and belief:

I am an attorney admitted in the above-captioned matter, and a partner in the law firm Jones Day, co-counsel to Plaintiffs. I submit this declaration to transmit to the Court the following

documents submitted in opposition to Harris County's Rule 12(c) Motion for Judgment on the Pleadings, filed in the above-captioned matter on November 22, 2022.

1. Exhibit 2 is a true and accurate copy of an email thread between Plaintiffs' and Defense counsel, dated October 12, 2022 to October 17, 2022.

2. Exhibit 3 is a true and accurate copy of a Google Review of Antidote Coffee, as it appeared at <https://bit.ly/3FEBFuW> as of November 22, 2022.

3. Exhibit 4 is a true and accurate copy of the "Meet the Team" subpage of the Texas3006.com online forum, as it appeared at <https://bit.ly/3t33aHr> as of November 22, 2022.

4. Exhibit 5 is a true and accurate copy of the "Search" subpage of the Texas3006.com online forum after entering "Antidote Coffee" into the "Business Name" search field, as it appeared at <https://bit.ly/3sIyuuy> as of November 22, 2022.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on November 22, 2022.

/s/ William R. Taylor

William R. Taylor
TX State Bar No. 24070727
wrtaylor@jonesday.com
JONES DAY
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Houston, Texas 77002
Telephone: (832) 239-3860
Facsimile: (832) 239-3600

From: Ryan Gerber <rgerber@everytown.org>
Sent: Monday, October 17, 2022 5:58 PM
To: Alla Lefkowitz
Cc: Kepadia, Heena (CAO); Laura Keeley; Andrew Nellis; Taylor, Charlotte H.; Taylor, William R.; Roe, Lesley E.
Subject: Re: Bay Area Unitarian Universalist Church et al. v. Ogg. et al., Case No. 4:20-cv-3081 (S.D. Tex.)

**** External mail ****

Hi Heena,

I tried you by phone this morning but I was unable to get a hold of you.

Please let us know by tomorrow, *10/18, at 2pm CST* whether Harris County will consent to removing the current motions deadline from the calendar.

Because we are now only 2 weeks away from the motions deadline, we intend to file our motion to remove that deadline by COB tomorrow.

Thanks,
Ryan

On Fri, Oct 14, 2022 at 8:57 AM Alla Lefkowitz <alefkowitz@everytown.org> wrote:
Hi Heena,

I hope you're doing well. I wanted to follow up on Ryan's email from Wednesday (he's out of the office today). Will Harris County consent to removing the current motions deadline from the calendar in anticipation of us filing a motion for leave to file an amended complaint?

The second question is whether Harris county would consent to us filing an amended complaint, but that is less urgent.

Thanks,
Alla

On Wed, Oct 12, 2022 at 11:29 AM Ryan Gerber <rgerber@everytown.org> wrote:
Hi Heena,

Thanks for speaking with me this morning. Just to reiterate, we intend to file an amended complaint in response to the Judge's recent order. We are open to working out schedules for responses to that complaint that are efficient and reasonable for all parties.

To that end, we have two specific questions. First, do you consent to us moving the Court to remove the current motions deadline of 11/1? We would like to get that on file ASAP. And second, do you consent to Plaintiffs filing an amended complaint?

Thanks,
Ryan

--

RYAN GERBER | COUNSEL

RGERBER@EVERYTOWN.ORG | (646) 324-8198

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ALLA LEFKOWITZ | SENIOR DIRECTOR, AFFIRMATIVE LITIGATION

ALEFKOWITZ@EVERYTOWN.ORG 202-545-3257 ext. 1007

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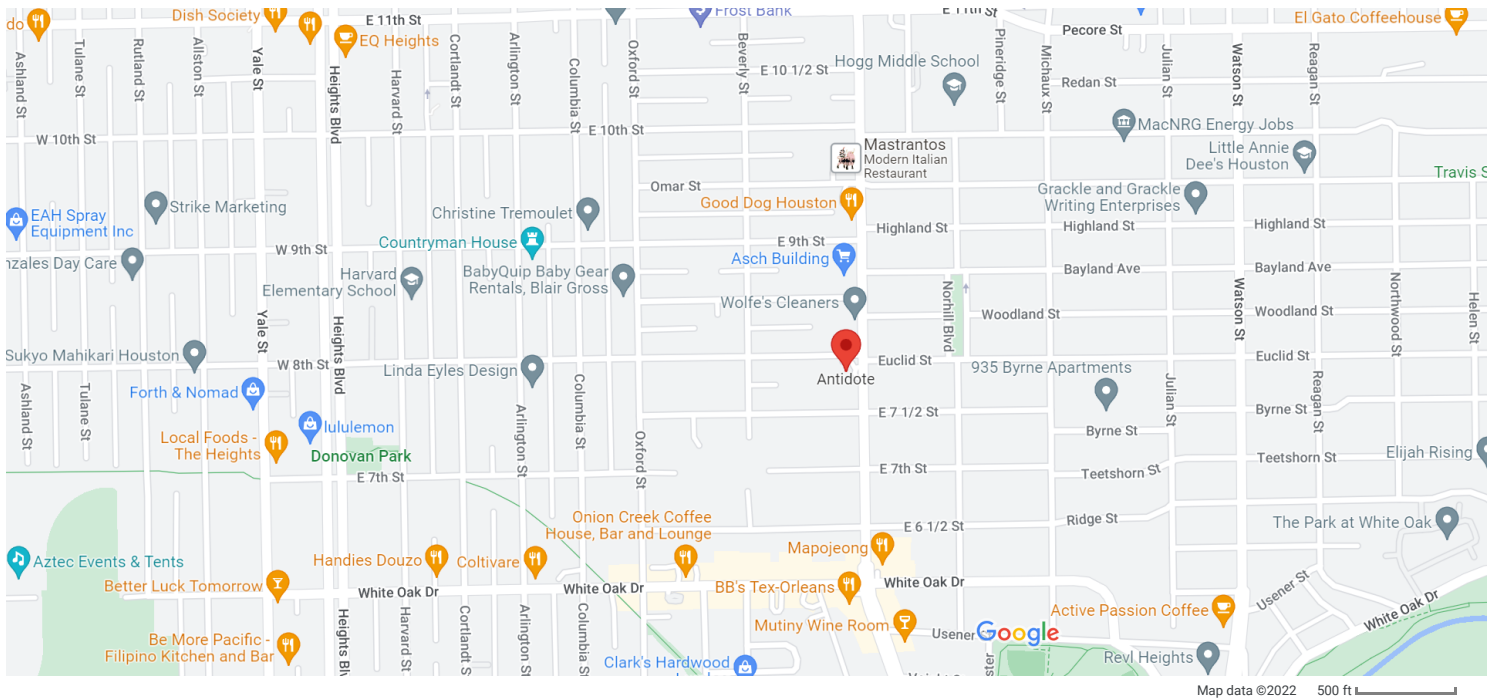
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RYAN GERBER | COUNSEL

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Antidote

Coffee shop · \$
Greater Heights

[PLACE DETAILS](#)

 David Daniel Turner

★ ★ ★ ★ ★ 2 years ago ⋮

The coffee shop posts 30.06 and 30.07 signage.

 2  Share

Wall of Shame:

Business Name	Total 30.06 Entries
Shell	73
Chevron	64
Sprouts	
Farmers Market	46



Username:
Password:

Forgot your username or password? [Click here](#)

[Home](#) [Search](#) [Submit](#) [Map](#) [Signs](#) [Help](#) [Forum](#) [Mobile Apps](#) [Donate](#)



Russell Jones

Founder, Web and Mobile API Development

Russell is a graduate of Sam Houston State University, with a bachelor's degree in Management Information Systems. He's a High Performance Computing specialist, and enjoys creating and working on web applications in his free time.

He created this website after noticing that Texas CHL holders lacked a centralized location for reporting and retrieving businesses and other facilities that deny our right to defend both ourselves and our families from criminals; the same criminals that by definition don't care what the laws say. The CHL community gave a **wonderful** response to the website, making it what it is today by submitting thousands of entries and comments about businesses restricting our right to self defense all across Texas.



Arthur Garza

iOS Development

Arthur is a graduate of the University of Texas at San Antonio (UTSA), with a Bachelors of Science in Computer Science and a concentration in Software Engineering. He is currently enrolled at Colorado State University in pursuit of a Master's degree in Computer Science and is employed as a Software Developer for the iOS platform.

Arthur had this to say: "I had been looking into ideas for developing iOS apps for a while, but couldn't find anything I thought was worthwhile. At the same time, I was new to concealed carry and wanted to know if there was a resource somewhere online that will show me where I couldn't carry. That's when I stumbled upon Texas3006.com and loved the concept! I quickly realized that the website did not have an accompanying iOS app and I thought, "Man, wouldn't it be great to have all of these resources in an app on my phone that is enabled with GPS technology?" I emailed Russell, the webmaster, and after a couple of emails, finally convinced him to let me work with him!"

Arthur started development on Texas3006 for iPhone in June of 2015 and released v1.0 of the app to the Appstore on January 14, 2016. The app is written in Swift, utilizing XCode 7 and uses many great open-source plugins such as Alamofire Networking, SlackTextViewController and MBProgressHUD.



Ruben Macias

Android Development

Ruben Macias is a professional software engineering consultant that specializes in the Microsoft .NET Framework. He has over 13 years experience in building a variety of applications including desktop apps, web apps, and web services. He has designed and written applications and systems for companies in different industries including digital image processing, manufacturing, retail, and insurance.

Though Ruben has a versatile technology background, he recently found his "calling" in building mobile apps for both Android and iOS. For the past several years, Ruben has been exclusively building internal mobile app for enterprise companies, and for consumer/retail companies. He has won numerous awards from the consulting company he is employed with for the work he has done. He decided to join the Texas3006.com team because he saw an opportunity to combine two of his passions - mobile app development, and the right to self defense.



Keith B.

Content Moderation

Since retiring in 2015 after over 36 years in the Telecommunications industry, Keith has been busy teaching Concealed Carry courses, working as a handyman doing home repairs, flying his hot air balloon and singing and playing with a bluegrass band. His passion for shooting and the shooting sports started at age 5 and over 50 years later he is still dedicated to teaching others how to shoot and be safe with firearms. He serves as a moderator for both Texas3006.com and TexasCHLForum.com.

Chris D.



Content Moderation

As his screen-name (Vol_Texan) suggests, Chris is a native of east Tennessee. He is a former Cavalry platoon leader and also spent four years as a reserve deputy for the local sheriff's office in Tennessee before moving to Texas in early 1993. He is a graduate of Park University with a bachelor's degree in Management & Management Information Systems. He works as a project management professional in the energy industry in Houston, TX.

He and his wife both have their LTC. His daughter started shooting at age 4, and by age 6 she was a common fixture at several of her favorite shooting ranges around west Houston.

Chris stumbled across the Texas3006.com site around 2012, and was impressed with Russell's idea to crowd-source sign info so concealed carriers in Texas would be able to carry and spend responsibly. He joined the Texas3006.com team in 2016 and looks forward to the day when the site becomes obsolete (because then 30.06/30.07 signs no longer have the weight of law in Texas!)



John D.

Content Moderation

John is a graduate of Pan American University (now UT-RGV) with a bachelor's degree in History and a minor in Geology. He has been employed by the McAllen Public Library System since 1978 and has specialized in library technology systems administration since 1985. This involved arcana like writing production programs in COBOL, tweaking Cisco router configs, crawling through ceilings installing CAT5 cable, and torturing innocent databases with SQL commands to name a few, all on hardware platforms many of which now are only seen in computer museums!

When not at work, at the gun range, or prospecting for .06/.07/51% signs he is often found mountain biking or road cycling.

Wall of Shame:

Business Name	Total 30.06 Entries
Shell	73
Chevron	64
Sprouts Farmers Market	46



Username:
Password:

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Business Name	Category	Street Address	City	Restriction Type	Search
<input type="text" value="Antidote Coffee"/>	<input type="text" value=""/>	<input type="text" value=""/>	<input type="text" value=""/>	<input type="text" value=""/>	

[Prev](#) [1](#) [Next](#) [All](#)

Business Name	Category	Address	City	Type	Location	Valid	Comments	Date	Username
Antidote Coffee Shop	Restaurant	729 Studewood St	Houston	30.06 & 30.07 Sign	At both entrances.	Yes	I guess I have to go somewhere else for coffee.	2017-06-03	Texas12Gauge
Map		Report					0 additional comments		

[Prev](#) [1](#) [Next](#) [All](#)

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