

# Exhibit A

Proposed Consent Judgment

**UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF TEXAS  
AMARILLO DIVISION**

CHIP HUNT AND REPUBLICAN PARTY OF  
TEXAS,

*Plaintiffs,*

v.

STATE OF TEXAS AND JANE NELSON, IN HER  
OFFICIAL CAPACITY AS TEXAS SECRETARY OF  
STATE,

*Defendants.*

CASE NO. 2:25-cv-00200-Z

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**ORDER AND FINAL JUDGMENT**

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Before the Court is Plaintiffs' and Defendant State of Texas's Joint Motion for Entry of a Consent Judgment. Having considered the Motion, the Complaint, and applicable law, the Court GRANTS the Motion.

The Court hereby **DECLARES** that the Texas Election code requiring the Republican Party of Texas to select its general election candidates through an open primary election in which a registered voter may affiliate with the Republican Party simply by appearing to vote in that primary election, violates Chip Hunt's First Amendment right of association and the Republican Party of Texas's First Amendment right to determine who is entitled to participate in the selection of its general election candidates.

The Court **DECLARES** further that the Republican Party of Texas is entitled to identify those who associate with the Party, and to exclude those who do not associate with the Party from participating in the Party's process for selecting general election candidates.

The Court **DECLARES** further that Texas Election Code sections 162.002, 003, 172.001 and .002 are unconstitutional to the extent that they interfere with the rights of the Republican Party of Texas and Chip Hunt as declared herein.

This final judgment with respect to Plaintiffs and the State of Texas is issued pursuant to Federal Rule of Civil Procedure 58(a). The Clerk of the Court shall transmit a true copy of this judgment to the parties.

SO ORDERED on this \_\_\_\_\_ day of \_\_\_\_\_ 2025.

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MATTHEW J. KACSMARYK  
United States District Judge