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Rebecca Huerta  
City Secretary

**IN THE MATTER OF  
PETITIONERS' ARTICLES OF  
IMPEACHMENTS OF  
MAYOR PAULETTE GUAJARDO**

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**PETITIONERS' MOTION TO MODIFY / AMEND CITY'S  
RULES OF PROCEDURE FOR CITY COUNCIL HEARING  
FOR REMOVAL ACTION UNDER THE CITY CHARTER**

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NOW COME Petitioners, and make and file this Petitioners' Motion to Modify / Amend City's Rules of Procedure for City Council Hearing for Removal Action Under the City Charter (the "Motion"), and in support would show:

1. Petitioners are committed to assuring that Mayor Paulette Guajardo receives due process of law in all proceedings contemplated pursuant to City of Corpus Christi ("City") Charter ("Charter"), Article II sections 10 and 11 (and pursuant to all provisions of the City's Charter, Texas law, and federal law).
2. Petitioner has confidence that all the City's Rules of Procedure for City Council Hearing for Removal Action Under the City Charter ("City's Procedures") meet or exceed all due process requirements of law (both state and federal law). Notwithstanding, and only out of an abundance of precaution, Petitioners recommend modification/amendment of the City's Procedures, as follows:
  - a) Section I: delete "The City Attorney's Office will advise the City Council in the hearing pursuant to the duties and responsibilities established by the City Charter, Article IV, Sec 10(a)," and replace with "The presiding officer, who may confer with legal counsel of his/her choosing, will advise the City Council in the hearing pursuant to the duties and responsibilities established by the City Charter."

- b) Section III.D: delete “Objections to evidence may be made by any party,” and replace with “Objections to evidence may be made by any party or the party’s attorney;” and delete “but if any other member of the Council requests with regard to particular evidence, a vote of the Council shall determine whether the evidence will be admitted.”
  - c) Section IV.B: delete “Council” and replace with “presiding officer.”
  - d) Section IV.D: delete “the witness may be examined by members of the Council.”
  - e) Section IV.E: delete.
  - f) Section VI: Add “Any party may pay a court reporter to make a certified reporter’s record which shall be part of the formal record of the matter.”
3. These proposed modifications/amendments to City’s Procedures may tend to address the City Legal Department’s possible conflict of interest, and Mayor’s due process concerns; and are thus requested.

WHEREFORE, PREMISES CONSIDERED, Petitioners pray for all relief requested herein, and for such other and further relief to which Petitioners may be justly entitled, both at law and in equity.

/s/ Douglas A. Allison  
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**ATTORNEY FOR PETITIONER  
AJIT DAVID**

**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the foregoing was electronically sent to all counsel of record via e-mail with City Secretary, Rebecca Huerta, on this the 14<sup>th</sup> day of May 2026.

/s/ Douglas A. Allison  
DOUGLAS A. ALLISON