

Date Filed 5.14.26



Rebecca Huerta
City Secretary

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

PETITIONERS' MOTION TO SCHEDULE

NOW COME Petitioners, and make and file this Petitioners' Motion to Schedule (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. In support of the orderly administration of justice, Petitioners request imposition of a schedule of pre-hearing (pre-trial) and hearing (trial) deadlines. Petitioners are flexible, but suggest the following schedule:
 - a) offering party's deadline to exchange deposition excerpts: May 26, 2026
 - b) responding party's deadline to exchange rebuttal deposition: June 2, 2026
 - c) all parties' deadline to submit final deposition excerpts: June 5, 2026
 - d) all parties' deadline to issue summons of documents/records: May 26, 2026
 - e) all parties' deadline to issue summons for witnesses to appear: May 26, 2026
 - f) all parties' deadline to submit draft of proposed "Presiding Officer's Charge to Members of the City Council:" June 15, 2026

- g) Pre-hearing/pre-trial matters considered by Presiding Officer: June 15, 2026
- h) date for commencement of Mayor's removal hearing/trial: June 22, 2026.
3. For scheduling purposes, Petitioners request that copies of documents/records subject to summons or subpoena shall be provided to counsel for Petitioners and counsel for Mayor within ten (10) days of date of summons or subpoena. A party may request an instruction that the opposing party's refusal to produce documents/records allows for an instruction that a negative inference may be drawn.
4. At time of pre-hearing/pre-trial hearing, Petitioners request that exhibits be considered for pre-admission into evidence.

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 14th day of May 2026.

/s/ Douglas A. Allison

DOUGLAS A. ALLISON