

**IN THE 346th JUDICIAL DISTRICT COURT  
EL PASO COUNTY, TEXAS**

**THE STATE OF TEXAS  
EX REL. Omar Carmona,**

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**Relator-Plaintiff**

v.

**Cause No. 2022DCV2472**

**YVONNE ROSALES  
In her Official Capacity as  
District Attorney of the 34th  
Judicial District**

**Respondent-Defendant**

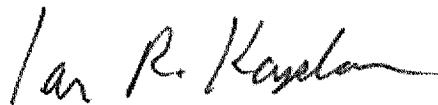
**NOTICE OF INTENT TO PROCEED IN THE REMOVAL OF THE DISTRICT  
ATTORNEY FOR THE 34th JUDICIAL DISTRICT, YVONNE ROSALES**

PLEASE TAKE NOTICE that on November 1, 2022, EL PASO COUNTY ATTORNEY JO ANNE BERNAL, on behalf of the State of Texas, files this notice of intent to proceed and to prosecute this removal action against the District Attorney for the 34<sup>th</sup> Judicial District, Yvonne Rosales, from office pursuant to Chapter 87 of the Local Government Code.

The State of Texas hereby requests that this case be set for a status hearing to determine a trial date and enter a scheduling order.

**Respectfully submitted,**

**JO ANNE BERNAL  
EL PASO COUNTY ATTORNEY  
500 East San Antonio, Room 503  
El Paso, Texas 79901  
Bus: (915) 546-2050  
Fax: (915) 546-2133  
Tex. Bar No. 02208720**



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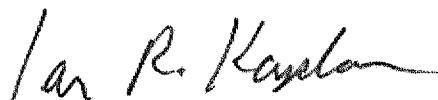
**BY: JOSE M. GONZALEZ**  
Assistant County Attorney  
Tex. Bar No. 08129225

**BY: IAN R. KAPLAN**  
Assistant County Attorney  
Tex. Bar No. 24043747

**BY: JOHN E. UNTEREKER**  
Assistant County Attorney  
Tex. Bar No. 24080627

**CERTIFICATE OF SERVICE**

I certify that a true copy of the above was served via electronic mail on Luis Yanez ([luis@yanezlawfirm.com](mailto:luis@yanezlawfirm.com)), The Law Office of Luis Yañez, 1015 Magoffin Ave, El Paso, TX 79901, lead counsel for El Paso District Attorney Yvonne Rosales, in accordance with the Texas Rules of Civil Procedure on November 1, 2022. I further certify that a copy was sent through electronic mail to Omar Carmona ([omar@clmfirm.com](mailto:omar@clmfirm.com)) who filed the removal petition and other counsel, via electronic mail David Chavez ([dchavez@yanezlawfirm.com](mailto:dchavez@yanezlawfirm.com)) and Patrick Wilson ([Patrick@wilsondiebel.com](mailto:Patrick@wilsondiebel.com)).



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IAN R. KAPLAN