

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

MEHDI CHERKAOUI, Individually and on behalf
of his two minor children,

Plaintiff(s),

v.

KEN PAXTON, in his official capacity as
Attorney General of Texas; KELLY HANCOCK,
in his official capacity as Acting Comptroller of
Public Accounts of the State of Texas, and MIKE
MORATH, in his official capacity as
Commissioner of Education of the State of
Texas,

Defendants.

Civil Action No. 4:26-cv-1675

**DEFENDANTS' ADVISORY TO THE COURT REGARDING
CONSOLIDATION OF 4:26-cv-1675 and 4:26-cv-1960**

Defendants Ken Paxton, in his official capacity as the Attorney General of Texas, Kelly Hancock, in his official capacity as Acting Comptroller of Public Accounts of the State of Texas, and Mike Morath, in his official capacity as Commissioner of Education of the State of Texas (collectively Defendants) file this advisory to the Court, as requested in the Court's March 13, 2026 Minute Entry ("Counsel has until the close of business Monday, March 16th to advise the court if a motion will be filed to consolidate case 4:26cv1675 and 4:26cv1960.")

Defendants respectfully advise the Court that they are unopposed to consolidating this matter with *Bayaan Academy, et al. v. Hancock, et al.*, No. 4:26cv1960 should the Court deem it necessary.

Dated: March 16, 2026

KEN PAXTON
Attorney General of Texas

BRENT WEBSTER
First Assistant Attorney General

RALPH MOLINA
Deputy First Assistant Attorney General

RYAN D. WALTERS
Deputy Attorney General for Legal Strategy

RYAN G. KERCHER
Chief, Special Litigation Division

OFFICE OF THE ATTORNEY GENERAL OF
TEXAS
Special Litigation Division
P.O. Box 12548, Capitol Station
Austin, Texas 78711-2548
(512) 463-2100

Respectfully submitted,

/s/ Zachary L. Rhines
ZACHARY L. RHINES
Special Counsel
Texas State Bar No. 24116957
zachary.rhines@oag.texas.gov

ALI M. THORBURN
Special Counsel
Texas State Bar No. 24125064
ali.thorburn@oag.texas.gov

GREY W. JOHNSTON
Assistant Attorney General
Texas State Bar No. 24149107
grey.johnston@oag.texas.gov
COUNSEL FOR STATE DEFENDANTS

Certificate of Service

Pursuant to Federal Rule of Civil Procedure 5(a), I hereby certify that on March 16, 2026, a true and correct copy of the above and foregoing document was filed and served electronically via CM/ECF.

MEHDI CHERKAOUI
Southern District of Texas ID No. 2101221
Texas Bar No. 24086077
CHERKAOUI & ASSOCIATES P.L.L.C.
700 Louisiana Street Suite 3950
Houston, TX 77002

Phone: 281-946-9466
Fax: 877-282-7874
mehdi@cherkaouilawfirm.com
COUNSEL FOR PLAINTIFFS

/s/ Zachary L. Rhines
ZACHARY L. RHINES
Special Counsel