

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
GALVESTON DIVISION**

TERRY PETTEWAY, THE  
HONORABLE DERRECK ROSE,  
MICHAEL MONTEZ, SONNY  
JAMES and PENNY POPE,

*Plaintiffs,*

v.

GALVESTON COUNTY, TEXAS,  
and HONORABLE MARK HENRY,  
in his official capacity as Galveston  
County Judge,

*Defendants.*

Civil Action No. 3:22-cv-57

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UNITED STATES OF AMERICA,

*Plaintiff,*

v.

GALVESTON COUNTY, TEXAS,  
GALVESTON COUNTY  
COMMISSIONERS COURT, and  
HONORABLE MARK HENRY, in  
his official capacity as Galveston  
County Judge,

*Defendants.*

Civil Action No. 3:22-cv-93

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Dickinson Bay Area Branch NAACP,  
GALVESTON BRANCH NAACP,  
MAINLAND BRANCH NAACP,  
GALVESTON LULAC COUNCIL  
151, EDNA COURVILLE, JOE A.  
COMPIAN, and LEON PHILLIPS,

Civil Action No. 3:22-cv-117

*Plaintiffs,*

v.

GALVESTON COUNTY, TEXAS,  
HONORABLE MARK HENRY, in  
his official capacity as Galveston  
County Judge, and DWIGHT D.  
SULLIVAN, in his official capacity as  
Galveston County Clerk

*Defendants.*

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**CONSENT MOTION FOR ENTRY OF STIPULATION AND ORDER  
REGARDING DISCOVERY OF DOCUMENTS AND  
ELECTRONICALLY STORED INFORMATION**

Consolidated Plaintiffs move, with the consent of all Consolidated Defendants, for entry of a proposed stipulation and order governing the discovery of documents and electronically stored information (“ESI”), pursuant to Federal Rule of Civil Procedure 26(c). The parties to the above-captioned consolidated action have met and conferred and anticipate production of ESI in the course of this action. Good cause exists to enter an ESI agreement to facilitate the just, speedy, and cost-efficient conduct of discovery involving ESI and privilege, and to promote, to the fullest extent possible, the resolution of disputes regarding the discovery of ESI without Court intervention. Accordingly, the parties have negotiated and reached agreement on the proposed Stipulation and Order attached as Exhibit 1.

In order for discovery to proceed without any unnecessary delay, Consolidated Plaintiffs, with the consent of Consolidated Defendants, respectfully request that the

Court enter the proposed stipulation and order regarding discovery of documents and ESI filed contemporaneously herewith.

Respectfully submitted this 12th day of August, 2022.

JENNIFER B. LOWERY  
United States Attorney  
Southern District of Texas

KRISTEN CLARKE  
Assistant Attorney General  
Civil Rights Division

DANIEL D. HU  
Civil Chief  
United States Attorney's Office  
Southern District of Texas  
Texas Bar No. 10131415  
SDTX ID: 7959  
1000 Louisiana Ste. 2300  
Houston, TX 77002  
713-567-9000 (telephone)  
713-718-3303 (fax)  
daniel.hu@usdoj.gov

/s/ Catherine Meza  
T. CHRISTIAN HERREN, JR.

ROBERT S. BERMAN\*  
CATHERINE MEZA\*  
Attorney-In-Charge  
BRUCE I. GEAR\*  
THARUNI A. JAYARAMAN\*  
ZACHARY J. NEWKIRK\*  
Attorneys, Voting Section  
Civil Rights Division  
U.S. Department of Justice  
950 Pennsylvania Avenue NW  
Washington, DC 20530  
202-307-2767 (telephone)  
202-307-3961 (fax)  
catherine.meza@usdoj.gov

\* *Admitted pro hac vice*

*Counsel for the United States*

/s/ Valencia Richardson

Mark P. Gaber\*  
Simone Leeper\*  
Valencia Richardson\*  
Orion de Nevers\*\*  
Campaign Legal Center  
1101 14th St. NW, Ste. 400  
Washington, DC 20005  
202-736-2200  
mgaber@campaignlegal.org  
cjackson@campaignlegal.org  
sleeper@campaignlegal.org  
vrichardson@campaignlegal.org  
odenevers@campaignlegal.org

Sonni Waknin\*  
Bernadette Reyes\*  
UCLA Voting Rights Project  
3250 Public Affairs Building  
Los Angeles, CA 90095  
310-400-6019  
sonni@uclavrp.org

*\*admitted pro hac vice*  
*\*\*admitted pro hac vice; licensed to practice in CA only, supervised by Mark Gaber, a member of the D.C. bar Counsel for Petteway Plaintiffs*

/s/ Sarah Xiyi Chen

**TEXAS CIVIL RIGHTS PROJECT**

Mimi M.D. Marziani  
Texas Bar No. 24091906  
Hani Mirza  
Texas Bar No. 24083512  
Joaquin Gonzalez\*  
Texas Bar No. 24109935  
Sarah Xiyi Chen\*  
California Bar No. 325327  
1405 Montopolis Drive

Chad W. Dunn (Tex. Bar No. 24036507)  
Brazil & Dunn  
4407 Bee Cave Road  
Building 1, Ste. 111  
Austin, TX 78746  
512-717-9822  
chad@brazilanddunn.com

Neil G. Baron  
Law Office of Neil G. Baron  
1010 E Main Street, Ste. A  
League City, TX 77573  
281-534-2748  
neil@ngbaronlaw.com

**SOUTHERN COALITION FOR SOCIAL JUSTICE**

Hilary Harris Klein\*  
North Carolina Bar No. 53711  
1415 W. Hwy 54, Suite 101  
Durham, NC 27707  
919-323-3380 (telephone)  
919-323-3942 (fax)  
hilaryhklein@scsj.org

Austin, TX 78741  
512-474-5073 (telephone)  
512-474-0726 (fax)  
mimi@texascivilrightsproject.org  
hani@texascivilrightsproject.org  
joaquin@texascivilrightsproject.org  
schen@texascivilrightsproject.org

**SPENCER & ASSOCIATES, PLLC**

Nickolas Spencer  
Texas Bar No. 24102529  
9100 Southwest Freeway, Suite 122  
Houston, TX 77074  
713-863-1409  
nas@naslegal.com

**WILLKIE FARR & GALLAGHER LLP**

Richard Mancino\*  
New York Bar No. 1852797  
Michelle Anne Polizzano\*  
New York Bar No. 5650668  
Andrew J. Silberstein\*  
New York Bar No. 5877998  
Molly Linda Zhu\*  
New York Bar No. 5909353  
Kathryn Carr Garrett\*  
New York Bar No. 5923909  
787 Seventh Avenue  
New York, New York 10019  
212-728-8000 (telephone)  
212-728-8111 (fax)  
rmancino@willkie.com  
mpolizzano@willkie.com  
asilberstein@willkie.com  
mzhu@willkie.com  
kgarrett@willkie.com

JoAnna Suriani\*  
DC Bar No. 1645212  
1875 K Street, N.W.  
Washington, DC 20006-1238  
202-303-1000 (telephone)  
202-303-2000 (fax)  
jsuriani@willkie.com

*\*admitted pro hac vice  
Counsel for NAACP Plaintiffs*

**CERTIFICATE OF CONFERENCE**

I hereby certify that on August 9, 2022 counsel for all parties conferred regarding the Stipulation and Order that is the subject of this Motion. I further certify that on August 11 and August 12, 2022, counsel for the United States conferred with counsel for the Petteway Plaintiffs, counsel for the NAACP Plaintiffs, and counsel for the Defendants who indicated that they do not oppose this Motion.

/s/ Catherine Meza  
CATHERINE MEZA  
*Counsel for the United States*

**CERTIFICATE OF SERVICE**

I hereby certify that on August 12, 2022, I filed the foregoing with the Clerk of Court using the CM/ECF system, which will send a notification to all counsel of record in this case.

/s/ Catherine Meza  
CATHERINE MEZA

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
GALVESTON DIVISION**

TERRY PETTEWAY, THE  
HONORABLE DERRECK ROSE,  
MICHAEL MONTEZ, SONNY  
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GALVESTON COUNTY, TEXAS,  
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Civil Action No. 3:22-cv-93

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Dickinson Bay Area Branch NAACP,  
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151, EDNA COURVILLE, JOE A.  
COMPIAN, and LEON PHILLIPS,

Civil Action No. 3:22-cv-117

<i>Plaintiffs,</i>	§
	§
v.	§
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GALVESTON COUNTY, TEXAS,	§
HONORABLE MARK HENRY, in	§
his official capacity as Galveston	§
County Judge, and DWIGHT D.	§
SULLIVAN, in his official capacity as	§
Galveston County Clerk	§
	§
<i>Defendants.</i>	§
	§

**STIPULATION AND ORDER REGARDING DISCOVERY**

Pursuant to Rule 26(f) of the Federal Rules of Civil Procedure, the undersigned Parties have entered into this Stipulation and Order to reduce the time, expense, and other burdens of discovery of documents, things, and electronically stored information (“ESI”), and to govern discovery obligations in this action.

**I. GENERAL PROVISIONS**

- A. The Parties, as well as their officers, directors, employees, and agents are referred to as the “Parties” solely for purposes of this stipulation.
- B. “Plaintiff” or “Plaintiffs” as used herein shall mean the parties listed in Appendix A.
- C. “Plaintiff Group” refers to the Plaintiff Groups defined in Appendix A.
- D. “Defendant” or “Defendants” as used herein shall mean the parties listed in Appendix B.



## **II. PRESERVATION AND PRODUCTION OF DOCUMENTS**

### **A. Preservation**

1. The Parties agree that by preserving documents, things, and ESI for the purpose of this litigation, they are not conceding that such material is discoverable, nor are they waiving any claim of privilege.
2. This Stipulation and Order does not modify any Party's obligation to maintain and preserve documents, things, and ESI where otherwise required by law, pursuant to a court order or administrative order, or in response to other anticipated litigation.

### **B. Limitations on Obligation to Preserve and Produce**

Subject to § II.D.1.b, for purposes of this action, the Parties agree to limit the scope of preservation as described in this section.

1. The Parties agree that they do not need to take specific, affirmative steps to preserve for purposes of this litigation the following categories of ESI:
  - a. Delivery or read receipts of e-mail to the extent such read receipts are not stored in the ordinary course in a custodian's e-mailbox;
  - b. Logs or other data from video-conferencing (including, *e.g.*, Teams or Zoom) or instant messaging tools involving (i) counsel of record for the Plaintiffs in this case (and their staff) and/or (ii) counsel of record for Defendants in this case (and their staff);
  - c. Temporary or cache files, including internet history, web browser cache, and cookie files, wherever located;

- d. Internally facing server system logs;
  - e. Externally facing or hosted file sharing system logs;
  - f. System data from photocopiers or fax machines;
  - g. Auto-saved copies of electronic documents;
  - h. Deleted, slack, fragmented, or other data only accessible by forensics; and
  - i. Random access memory (“RAM”), temporary files, or other ephemeral data that are difficult to preserve without disabling the operating system.
  - j. Logs of or other data from audio calls (including, *e.g.*, landline phones, mobile devices, and Voice Over Internet Protocol (“VOIP”)) made to or from (i) counsel of record for the Plaintiffs in this case (and their staff) and/or (ii) counsel of record for Defendant(s) in this case (and their staff);
  - k. Voicemail messages on the voicemail systems of (i) counsel of record for the Plaintiffs in this case (and their staff) and/or (ii) counsel of record for Defendants in this case (and their staff);
2. When duplicate copies<sup>1</sup> of relevant ESI exist in more than one location, this Order does not require a Party to preserve all duplicates as follows:
- a. ESI on backup tapes, continuity of operations or disaster recovery systems, data or system mirrors or shadows, and other systems that are used primarily for the purpose of system recovery or information restoration and are not reasonably accessible (“Backup Systems”) need

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<sup>1</sup> A “duplicate” in the context of this Order means a copy of an identical document, identified by matching hash values, as described in paragraph II.E.2.f, below.

not be preserved pursuant to this Order *provided that* duplicate copies of relevant ESI have been preserved in another reasonably accessible location.

3. The Parties agree that they do not need to take specific, affirmative steps to preserve for purposes of this litigation relevant documents, things, and ESI (including internal communications, drafts, versions, and collaboration on case-related work) created by and, if shared with any other(s), exchanged *solely* among: (1) counsel of record for the Plaintiffs in this case (and their staff) and/or (2) counsel of record for the Defendants in this case (and their staff).
4. The Parties agree not to seek discovery of documents, things, and ESI that they have agreed not to preserve pursuant to § II.B.1-2 above. As provided in § II.D.1 below, the Parties do not need to list such items on a privilege log prepared and served in connection with discovery in this case.

**C. Identification & Production of Documents, Things, and ESI**

1. Search Process and Criteria
  - a. It is the responsibility of the Party responding to a discovery request to identify and produce responsive information including ESI. The Parties agree to meet and confer within 14 days of the receipt of production requests (unless the Parties agree to a later date) if either believes that date ranges or the use of keyword search criteria or analytic tools should be used to identify responsive ESI. The Parties will also meet and confer prior to

the use of any advance culling or technology assisted review methodologies.

- b. The Parties shall produce responsive, non-privileged ESI and hard copy materials from custodians likely to have responsive information in their possession, custody, or control. The Parties agree to meet and confer within 14 days of the receipt of production requests (unless Parties agree to a later date) if either Party believes a list of agreed-to custodians should be used to identify responsive ESI. In addition, the Parties will be responsible for identifying, searching, and producing from all non-custodial data sources (including but not limited to databases, information archives, shared drives, etc.) reasonably likely to have requested information.
  - c. The Parties agree that the use of an agreed-to search process or set of search criteria shall not be construed as a waiver of any Party's right to request subsequent searches and productions, where there is a showing that the agreed-to search process and criteria have resulted in inadequate productions or failed to identify relevant materials. The Parties also reserve their right to object to any additional requests or subsequent searches.
2. Production Format
- a. ESI and hard copy paper documents will be produced as specified herein.
  - b. Each hard copy paper document must be scanned and produced in electronic form as specified herein.

- c. Except as provided in § II.C.2.n below, ESI must be processed with eDiscovery software that extracts metadata and text and converts the document to an image format that accurately represents the full contents of the document.
- d. Unless the Parties agree to a different production format, for ESI and scanned hard copy paper documents, content shall be scanned or converted to single-page, Tagged Image File Format (“TIFF”), using CCITT Group IV compression at 300 d.p.i. and that accurately reflects the full and complete information contained in the original document. One image file shall represent one page of the document. Notwithstanding the foregoing, hard copy documents that cannot be accurately represented in black and white or that are primarily in color shall be scanned in color to JPEG files using a high-quality setting. Parties need not, in the first instance, produce ESI containing color in color format. A receiving Party may request that the producing Party consent to production of such ESI in color format by (1) providing a list of the Bates numbers of the document(s); and (2) explaining the need for production of the documents in color format. Consent to produce in color shall not be unreasonably withheld.
- e. For ESI and scanned hard copy paper documents, the text of all pages in the document must be saved as one file. For ESI, the text must be extracted from the native file. If the extracted text of a native document does not exist or does not represent the entire document, Optical Character

Recognition (“OCR”) will be provided instead. For hard copy documents and for any redacted documents, OCR text will be provided.

- f. Metadata, if originally available, must be preserved and produced for the fields listed in Appendix C.
- g. Deduplication will be used to remove exact duplicate documents from the production at the family level: *i.e.*, the Parties will take reasonable steps to not remove or delete attachments even if duplicated elsewhere in the production. The Parties agree to use MD-5 hash values for deduplication and calculate those values for all ESI at the time of collection or processing.
- h. All productions will provide a consistent load file with the same number and order of fields regardless of the types of documents in the production.
- i. All images (*e.g.*, TIFF, JPEG) will be produced in a directory labeled IMAGES. Subdirectories may be created so that one directory does not contain more than 5000 files.
- j. All native files (with the proper Windows-associated extension) will be produced in a directory labeled NATIVE. Subdirectories may be created so that one directory does not contain more than 5000 files.
- k. An image cross reference file (a file in Concordance Opticon/Relativity .log format that contains Bates Numbers, paths to images, and document break indicators for all ESI in each production) and a load file containing all required metadata fields will be produced in a directory labeled DATA.

- l. All extracted text and/or OCR will be produced in a directory labeled TEXT. OCR is searchable text generated for scanned documents or native files that is in ASCII format, where all pages in the document will be represented in one file. The Parties agree to provide a text file for all documents, even if the size of the file is zero. Subdirectories may be created so that one directory does not contain more than 5000 files.
- m. Except for native files, the Parties will produce responsive documents Bates-stamped with a prefix to indicate the Party producing the documents. The Bates numbering convention shall be in the format “XXX#####” where “XXX” represents the short character abbreviation for the producing Party and “#####” represents the eight-digit sequential number of the page being produced by that Party. Each Party will use a unique abbreviation. For native files, which cannot be Bates-stamped, the Parties will rename the file as [Bates Number].[extension] with a single-page placeholder image in the production containing the original name of the file and stamped with the corresponding Bates number.
- n. Specifications for Specific File Types:
  - (i) Text Messages. The Parties will meet and confer to seek agreement on an appropriate production format if a Party identifies text messages that are potentially responsive to a request. Any such conference shall be held within fourteen (14) days (unless the Parties agree to a later date) of identification of such messages.

- (ii) Audio files and video files shall be produced as native files unless the native form is a proprietary format, in which case the file(s) should be converted into a non-proprietary format such .mp4. For each audio or video file, a placeholder image containing the file name shall be included in the production.
- (iii) Excel or other types of spreadsheets shall be produced as native files with all cells unlocked. For each Excel or spreadsheet file, a placeholder image containing the file name shall be included in the production.
- (iv) Presentations (e.g., PowerPoint) shall be produced as both (1) color images without speaker notes and with extracted text and (2) native files with all notes unaltered and viewable. For each native file, a placeholder image containing the file name shall be included in the production.
- (v) Social media content (including comments, “likes,” sharing, and other interactions with the post(s)) should be produced as individual images with extracted text, including information identifying the participants and the date and time of the communications.
- (vi) GIS map files or similar data applications. The Parties will meet and confer to seek agreement on an appropriate production format if a Party identifies mapping files that are potentially responsive to a request. Any such conference shall be held within fourteen (14)



days (unless the Parties agree to a later date) of identification of such files.

(vii) Databases. The Parties will meet and confer regarding the production of records or data from systems of record or databases in an agreed upon format. Any such conference shall be held within fourteen (14) days (unless the Parties agree to a later date) of identification of such databases, and any such conference shall include the technicians with sufficient knowledge to explain the content and format of the databases.

- o. The Parties agree to meet and confer regarding alternative production formats, including native files or pdf, should the producing Party find that it is unduly burdensome to adhere to the production format specified in this section for certain documents, in light of the format in which the documents are maintained in the ordinary course of business.

3. Production Media

- a. Except for records or data produced from large databases or database systems (*e.g.*, state voter files), responsive documents and ESI will be produced via .zip file(s) uploaded to an electronic file transfer site, or as otherwise agreed by the Parties. Productions produced via an electronic file transfer site will be divided into .zip files of no more than 20 gigabytes each. In the case of documents and ESI produced by the

United States, responsive information will be produced via .zip file(s) uploaded to the Justice Enterprise File Sharing System (JEFS).

- b. Productions via electronic file transfer will be uploaded in a manner (or otherwise clearly labeled) to indicate (1) the Party producing the information, (2) the date of the production, and (3) the Bates-range(s).
- c. Records or data produced from large databases or database systems (*e.g.*, state voter files, etc.) will be produced on CD, DVD, thumb drive, or hard drive appropriate to the size of the production via overnight delivery to counsel for the requesting Party. Such production media will be clearly labeled to indicate (1) the Party producing the information, (2) the date of the production, and (3) the Bates-range(s).
- d. The Parties agree to remove all encryption or password protection for all ESI produced or, if applicable, to provide passwords or assistance needed to open encrypted files.

**D. Privileged Documents, Things and ESI**

1. Privilege Logs and Redactions
  - a. Where a producing Party has any document that contains both privileged and non-privileged responsive information, the responsive information shall be produced, but the privileged information may be redacted. For all documents withheld in whole based on privilege, the Parties agree to furnish logs which comply with the legal requirements under the Federal Rules of Civil Procedure. At minimum, the privilege log must contain a

Bates range, the type of document, the date of the creation or last modification or transmission of the document, the author or authors of the document, the recipients of the document (including individuals copied or blind-copied, when such information is available), whether the document contains attachments, the privilege or privileges claimed, and the basis for the assertion of privilege or protection.

- b. If any discovery request appears to call for the production of documents, things or ESI covered by § II.B, the responding Party is not required to produce or identify such information on a privilege log. However, if a Party preserves relevant documents, things, or ESI covered by § II.B in order to support a claim or defense in this case, the Party shall produce such information or identify it on a privilege log notwithstanding this subsection.

(i) For clarity, this subsection shall include, but is not limited to, the following categories of documents:

1. Privileged documents or documents subject to the work product protection created after commencement of the action;
2. Communications solely between a Party and its respective counsel of record;
3. Privileged communications solely between in-house counsel of a Party; and
4. Internal communications within a law firm.

2. Disclosure of Privileged or Protected Information

- a. Pursuant to Federal Rule of Evidence 502(d), if a producing Party discloses information (including both hard copy documents and ESI) subject to protection by the attorney-client privilege, the work-product, joint defense or other similar doctrine, and/or applicable governmental privileges (such as deliberative process privilege), such disclosure shall not constitute a waiver of any privilege or other protection.
- b. If the producing Party inadvertently discloses information that it asserts is privileged or protected, it will notify the receiving Party within 14 days of discovery of inadvertent disclosure and provide the production date, number, and volume of the disc or drive on which the production was produced, if applicable, (“production media”), and the Bates number(s) or Document ID (for native files) of all material that it believes contains the inadvertently disclosed information.
- c. If a production contains information that the receiving Party believes is privileged or protected and was inadvertently produced, it will promptly notify the producing Party and provide the Bates number(s) or Document ID (for native files) of the item it believes was inadvertently produced. Within 14 days after receiving notification, the producing Party may make a written request for return of the material. If the producing Party does not send a written request for return of the material to the receiving Party within 14 days of the notification, the

producing Party waives all claims of privilege or protection as to the material, but this still does not operate as a subject matter waiver.

- d. When the receiving Party receives a written demand for return of the material, it will make reasonable, good faith efforts to promptly sequester, return or destroy all inadvertently produced material identified by the producing Party. If copies of inadvertently produced materials are located or stored on the receiving Party's Backup or Archival System(s), those copies need not be affirmatively removed but, rather, the receiving Party may overwrite those copies according to its normal records management procedures.
- e. If the receiving Party must destroy or delete production media (*e.g.*, CD, DVD, thumb drive, or downloaded file(s)) in order to destroy or delete inadvertently produced material, the producing Party will provide a duplicate copy of the production media minus only the inadvertently produced material within 14 days of its written request for return of the material to the receiving Party.
- f. If the receiving Party intends to challenge the claim of privilege or protection or the inadvertence of the production, it will sequester and retain the inadvertently produced material while seeking a ruling from the Court. Nothing in this Stipulation prevents access by a receiving Party's information technology or security personnel from accessing, in

the normal course of their work, systems or locations where inadvertently produced material is sequestered.

- g. This stipulated agreement set forth in this section and its subparts does not constitute a concession by any Party that any documents are subject to protection by the attorney-client privilege, the work-product, joint defense or other similar doctrine, and/or applicable governmental privileges (such as deliberative process privilege). This agreement also is not intended to waive or limit in any way any Party's right to contest any privilege claims that may be asserted with respect to any of the documents produced except to the extent stated in the agreement.

**E. Costs of Document Production**

Without waiver of objection to over breadth, harassment or scope or as otherwise ordered by the Court, each Party shall bear the costs of producing its own documents, things, and ESI.

**III. MISCELLANEOUS**

- A. The Stipulation may be executed in counterparts.
- B. The terms of this Stipulation and Order are not exhaustive. Each Party reserves the right to subsequently request to meet and confer to address any discovery matters, including forms of production and other matters not addressed herein.
- C. None of the meet and confer provisions of this Stipulation shall be construed to extend the time within which a Party must respond to a discovery request.

**D.** The Parties agree that discovery requests may be served to a Party by email to counsel representing that Party, with a copy to counsel for other Parties.

Agreed to by counsel for the Parties:

For the United States:

          /s/ Catherine Meza          

Date: August 12, 2022

For Petteway Plaintiff Group:

          /s/ Valencia Richardson          

Date: August 12, 2022

For NAACP/LULAC Plaintiff Group:

          /s/ Sarah Xiyi Chen          

Date: August 12, 2022

For Consolidated Defendants:

          /s/ Dallin B. Holt          

Date: August 12, 2022

So ORDERED:

DATED: \_\_\_\_\_

\_\_\_\_\_

## **APPENDIX A**

The Plaintiffs in this action are:

1. The United States;
2. The “Petteway Plaintiff Group” consists of Terry Petteway, the Honorable Derrick Rose, Michael Montez, Penny Pope, and Sonny James; and
3. The “NAACP/LULAC Plaintiff Group” consists of the Dickinson Bay Area Branch NAACP, Galveston Branch NAACP, Mainland Branch NAACP, Galveston League of United Latin American Citizens (“LULAC”) Council 151, Edna Courville, Joe Compian, and Leon Phillips.



**APPENDIX B**

The Defendants are:

1. Galveston County, Texas;
2. Galveston County Commissioners Court;
3. The Honorable Mark Henry, in his official capacity as Galveston County Judge;  
and
4. Dwight D. Sullivan, in his official capacity as Galveston County Clerk.

## APPENDIX C

Field Name	Definition	Include for Emails and Text Messages	Include for other electronic files (including email attachments)	Include for Paper documents
<b>Begin_Bates</b>	Bates number for the first image of a document (or the Bates number of the placeholder page for a native document).	Y	Y	Y
<b>End_Bates</b>	Bates number for the last image of a document (or the Bates number of the placeholder page for a native document).	Y	Y	Y
<b>Begin_Attach</b>	<u>Only</u> for document families, <sup>2</sup> provide Bates number for the first image of the first attachment or embedded file. Leave this field blank if there is no document family.	Y	Y	Y

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<sup>2</sup> Document Family means a group of related documents, including: (1) paper documents that were grouped together or physically attached by clips, staples, binding, folder, etc.; (2) email with its attachment(s); and (3) files with embedded documents.

<b>Field Name</b>	<b>Definition</b>	<b>Include for Emails and Text Messages</b>	<b>Include for other electronic files (including email attachments)</b>	<b>Include for Paper documents</b>
<b>End_Attach</b>	<u>Only</u> for document families, provide Bates number for the last image of the last attachment or embedded file. Leave this field blank if there is no document family.	Y	Y	Y
<b>Parent ID</b>	Bates number of the parent document (filled in only for “child” documents).	Y	Y	Y
<b>Record Type</b>	Reflecting one of the following four values: Email, Attachment, eDoc, or Hard Copy	Y	Y	Y
<b>From</b>	“From” field in email.	Y		
<b>To</b>	“To” field in email.	Y		
<b>CC</b>	“CC” field in email.	Y		

<b>Field Name</b>	<b>Definition</b>	<b>Include for Emails and Text Messages</b>	<b>Include for other electronic files (including email attachments)</b>	<b>Include for Paper documents</b>
<b>BCC</b>	“BCC” field in email.	Y		
<b>Subject</b>	“Subject” field in email.	Y		
<b>Attachments</b>	File names of the attachments.	Y		
<b>DateSent</b>	Date sent field from email (format: yyyyymmdd)..	Y		
<b>TimeSent</b>	Time sent field from email (format: hh:mm:ss).			
<b>Redacted</b>	“Yes” if the document has been redacted.	Y	Y	Y
<b>Confidential</b>	Confidential Designation (if any).	Y	Y	Y
<b>MD5Hash</b>	The MD5 hash value calculated when the file was collected or processed.	Y	Y	
<b>Prod_FilePath</b>	The path to the native file on the production media.	Y	Y	
<b>Native_filename</b>	Original name of the native file when the file was	Y	Y	

<b>Field Name</b>	<b>Definition</b>	<b>Include for Emails and Text Messages</b>	<b>Include for other electronic files (including email attachments)</b>	<b>Include for Paper documents</b>
	collected or processed.			
<b>Text File Path</b>	Path to the text file on the production media.	Y	Y	Y
<b>All_Custodians</b>	Additional custodians who had a copy of the document prior to de-deduplication, including duplicate custodians.	Y	Y	
<b>Custodian</b>	Name of custodian associated to original produced file (Last Name, First Name format) Where redundant names occur, individuals should be distinguished by an initial which is kept constant throughout productions. For instance: Smith, John A. and Smith, John B.	Y	Y	Y

<b>Field Name</b>	<b>Definition</b>	<b>Include for Emails and Text Messages</b>	<b>Include for other electronic files (including email attachments)</b>	<b>Include for Paper documents</b>
<b>Author</b>	Author of document		Y	Y
<b>LastAuthor</b>	Last author or editor of document, from document properties		Y	
<b>DateCreated</b>	Date the document was created (format: yyyyymmdd)		Y	
<b>TimeCreated</b>	Time at which document was created (format: hh:mm:ss)		Y	
<b>DateLastModified</b>	Date an electronic document was last modified (format: yyyyymmdd)		Y	
<b>TimeLastModified</b>	Time at which document was last modified		Y	

<b>Field Name</b>	<b>Definition</b>	<b>Include for Emails and Text Messages</b>	<b>Include for other electronic files (including email attachments)</b>	<b>Include for Paper documents</b>
	(format hh:mm:ss)			
<b>FileName</b>	File name of an electronic document		Y	
<b>FileExt</b>	File extension	Y	Y	
<b>FileSize</b>	The original file size of the produced document		Y	
<b>ProdVolume</b>	The production volume associated with the produced file	Y	Y	Y