The Honorable Judge Andrew M. Edison
United States District Court
601 Rosenberg, Seventh Floor
Galveston, TX 77550

January 25, 2023

Re: Petteway v. Galveston County, Consolidated Case No. 3:22-cv-57

Dear Judge Edison:

The parties seek a conference on discovery disputes concerning Defendants' assertions of attorney-client and work-product privilege in response to Plaintiffs' requests for production.

I. Summary of Dispute and Discussion

In August 2022, consolidated Plaintiffs served their first sets of written discovery on Defendants. On December 31, and by agreement between the parties, Defendants served their privilege log. Defendants provided a corrected version on January 2, 2023. Defendants withheld 468 documents based on attorney-client privilege and the work-product doctrine. Ex. A. On January 6, Plaintiffs sent Defendants an annotated excel version of Defendants' privilege log that included a row-by-row explanation of Plaintiffs' challenges to the asserted privileges for 353 documents on the log. Ex. B. Plaintiffs also provided the legal basis by category for each challenge and requested a meet-and-confer. Ex. C. Defendants agreed to meet over Zoom on January 12 at 3pm CT. Although after the meet and confer conference, Defendants made a few concessions, it remains clear that the Parties have a fundamental disagreement over the assertion and application of the attorney-client privilege and the attorney work-product protection. To reflect their concessions Defendants submitted a revised privilege log on January 20, 2023. Defs.' Ex. 1. After Plaintiffs requested an explanation of what changes were made in the revised privilege log, Defendants listed which entries had changed and the reason there were new entries in the revised log. Ex. F.

II. Plaintiffs' Positions

Defendants' invocations of the work product privilege are overbroad. *See* Exs. B, C. They have asserted work-product protections over virtually every document detailing the 2021 map-drawing legislative record, despite the fact that "[d]ocuments created in the ordinary course of drafting legislation—including redistricting legislation—are not covered by the work product doctrine"; this is true even if the Commissioners Court "may have reasonably believed that litigation would result from its redistricting efforts." *LULAC v. Abbott*, No. EP-21-CV-00259, 2022 U.S. Dist. LEXIS 144545, at *16 (W.D. Tex. Aug. 12, 2022) (cleaned up). What's more, Defendants continue to assert work-product privilege even after Commissioner Apffel testified that Defendants "[a]bsolutely" did not expect litigation. Ex. D.

Defendants' assertions of attorney-client privilege are likewise overbroad and without basis. The descriptive information Defendants have provided for many documents shows that the primary purpose was "advice on political, strategic, or policy issues," not legal advice which is Defendants' burden to substantiate. *LULAC*, 2022 U.S. Dist. LEXIS 144545, at *14. This issue remains despite Defendants' recent modifications to their reasons for asserting privilege. *Compare* Ex. F *with*

A. 80 or $90,000, but only 25,000 for mapping. And what I liked about that one was it -- it -- if there -- those people -- these two that you've shown me were just about mapping.

That one said not only will we draw the maps for you, we will handle your litigation as part of it.

Q. Did you expect litigation?

A. Absolutely not.

Q. So why was that a factor in hiring Oldham?

A. Because it -- it would make good business sense to me that not only did -- these people were putting their money where their mouth is to say, our maps were going to be within the bounds of the law, so much that we will -- we will handle any litigation as part of our fees.

Q. Did it strike you as odd, that they would include litigation -- expected litigation --

A. No. It struck --

Q. -- as part of their proposal?

A. -- it struck me as good, that, hey, look, it's a guarantee, a warranty of the work.

Q. What did you know about Mr. Oldham's background, at this time?

A. Nothing.

EXHIBIT E

Excerpts of January 17, 2023 Deposition of County Judge Henry

ROUGH DRAFT, NOT CERTIFIED.

CASE NAME: HONORABLE TERRY PETTEWAY, ET AL VS. GALVESTON COUNTY, TEXAS, ET AL

WITNESS: MARK HENRY

DATE OF DEPOSITION: JANUARY 17, 2023

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letter. That's -- and we can pull this down. And let's pull up Document 34. This is going to be Exhibit 20.

(Exhibit No. 20 was marked.)

Q. (BY MS. KLEIN) While we're waiting for it to load, let me ask you, what was your expectation for the scope of work your redistricting counsel would provide for you in the 2021 redistricting process?

A. What was my expectation about the scope of his work?

Q. What did you think Holtzman Vogel was going to do for you with respect to the 2021 redistricting process?

A. I want to be clear that my belief was that Dale was really the person that I was hiring. Holtzman Vogel comes with him I understand that. But that Dale would get us a legally compliant map that gets us in balance for the -- with the census data we have available.

Q. So your understanding was that Dale would draft the map for you?

A. Yes.

Q. Did you have the understanding he would draft several maps for you?

A. I don't know that I gave him an upper and lower limit. The more maps he drafts, the more he charges us. But it would be more than one.

EXHIBIT F

The Parties' Email Exchanges re Defendants' Privilege Log

Hilary Harris Klein

From: Shawn Sheehy <ssheehy@HoltzmanVogel.com>
Sent: Tuesday, January 24, 2023 6:25 PM
To: Hilary Harris Klein
Cc: Joseph Russo; Jason Torchinsky; Jordan Raschke Elton; Bernadette Reyes; Mark Gaber; neil@ngbaronlaw.com; Simone Leeper; Sonni Waknin; Valencia Richardson; Alexandra Copper; Chad Dunn; Adrianne Spoto; asilberstein@willkie.com; Vall-llobera, Diana; Hani Mirza; Joaquin Gonzalez; jsuriani@willkie.com; Garrett, Kathryn; Polizzano, Michelle; Zhu, Molly; nas@naslegal.com; rmancino@willkie.com; Sarah Chen; Gear, Bruce (CRT); Meza, Catherine (CRT); daniel.hu@usdoj.gov; Dallin Holt; jennifer.lowery@usdoj.gov; Robert.Berman@usdoj.gov; Newkirk, Zachary (CRT); Jayaraman, Tharuni (CRT)
Subject: RE: [External]Petteway v. Galveston County - 3:22cv57 - Consolidated Defendants' Privilege Log

Follow Up Flag: Follow up
Flag Status: Completed

Hilary,

First, here are the document numbers on the privilege log where we made substantive edits:

458
37
140
87
249
325
333
335
357
336
327
7
15
13
3
448
278
453
303

Second, the privilege log of January 20, 2023, does not contain any new documents that were not previously on the privilege log. Instead, the numbers changed because we included some duplicate entries on the latest privilege log that were not previously included. By this I mean that if two people were included on an email that was privileged, we have included that email twice.

Thank you,

Shawn Sheehy
Holtzman Vogel Baran Torchinsky & Josefiak PLLC
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From: Shawn Sheehy
Sent: Monday, January 23, 2023 7:22 PM
To: Hilary Harris Klein <hilaryhklein@scsj.org>
Cc: Joseph Russo <JRusso@greerherz.com>; Jason Torchinsky <jtorchinsky@HoltzmanVogel.com>; Jordan Raschke Elton <jraschkeelton@greerherz.com>; Bernadette Reyes <bernadette@uclavrp.org>; Mark Gaber <MGaber@campaignlegalcenter.org>; neil@ngbaronlaw.com; Simone Leeper <SLeeper@campaignlegalcenter.org>; Sonni Waknin <sonni@uclavrp.org>; Valencia Richardson <VRichardson@campaignlegalcenter.org>; Alexandra Copper <ACopper@campaignlegalcenter.org>; Chad Dunn <chad@brazilanddunn.com>; Adrianne Spoto <Adrianne@scsj.org>; asilberstein@willkie.com; Vall-llobera, Diana <DVall-llobera@willkie.com>; Hani Mirza <hani@texascivilrightsproject.org>; Joaquin Gonzalez <joaquin@texascivilrightsproject.org>; jsuriani@willkie.com; Garrett, Kathryn <KGarrett@willkie.com>; Polizzano, Michelle <mpolizzano@willkie.com>; Zhu, Molly <mzhu@willkie.com>; nas@naslegal.com; rmancino@willkie.com; Sarah Chen <schen@texascivilrightsproject.org>; Gear, Bruce (CRT) <Bruce.Gear@usdoj.gov>; Meza, Catherine (CRT) <Catherine.Meza@usdoj.gov>; daniel.hu@usdoj.gov; Dallin Holt <dholt@HoltzmanVogel.com>; jennifer.lowery@usdoj.gov; Robert.Berman@usdoj.gov; Newkirk, Zachary (CRT) <Zachary.Newkirk@usdoj.gov>; Jayaraman, Tharuni (CRT) <Tharuni.Jayaraman@usdoj.gov>
Subject: RE: [External]Petteway v. Galveston County - 3:22cv57 - Consolidated Defendants' Privilege Log

Hilary,

Thank you. I am reviewing your questions below and should be able to provide an answer by COB tomorrow.

Thank you,

Shawn Sheehy
Holtzman Vogel Baran Torchinsky & Josefiak PLLC
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From: Hilary Harris Klein <hilaryhklein@scsj.org>
Sent: Friday, January 20, 2023 9:46 PM
To: Shawn Sheehy <ssheehy@HoltzmanVogel.com>
Cc: Joseph Russo <JRusso@greerherz.com>; Jason Torchinsky <jtorchinsky@HoltzmanVogel.com>; Jordan Raschke Elton <jraschkeelton@greerherz.com>; Bernadette Reyes <bernadette@uclavrp.org>; Mark Gaber <MGaber@campaignlegalcenter.org>; neil@ngbaronlaw.com; Simone Leeper <SLeeper@campaignlegalcenter.org>; Sonni Waknin <sonni@uclavrp.org>; Valencia Richardson <VRichardson@campaignlegalcenter.org>; Alexandra Copper <ACopper@campaignlegalcenter.org>; Chad Dunn <chad@brazilanddunn.com>; Adrianne Spoto <Adrianne@scsj.org>; asilberstein@willkie.com; Vall-llobera, Diana <DVall-llobera@willkie.com>; Hani Mirza <hani@texascivilrightsproject.org>; Joaquin Gonzalez <joaquin@texascivilrightsproject.org>; jsuriani@willkie.com; Garrett, Kathryn <KGarrett@willkie.com>; Polizzano, Michelle <mpolizzano@willkie.com>; Zhu, Molly <mzhu@willkie.com>; nas@naslegal.com; rmancino@willkie.com; Sarah Chen <schen@texascivilrightsproject.org>; Gear, Bruce (CRT) <Bruce.Gear@usdoj.gov>; Meza, Catherine (CRT) <Catherine.Meza@usdoj.gov>; daniel.hu@usdoj.gov; Dallin Holt <dholt@HoltzmanVogel.com>; jennifer.lowery@usdoj.gov; Robert.Berman@usdoj.gov; Newkirk, Zachary (CRT) <Zachary.Newkirk@usdoj.gov>; Jayaraman, Tharuni (CRT) <Tharuni.Jayaraman@usdoj.gov>
Subject: RE: [External]Petteway v. Galveston County - 3:22cv57 - Consolidated Defendants' Privilege Log

Good evening Shawn,

I very much appreciate you emailing us to notify us of the production this time. Can you clarify how the production of documents you reference was made? I do not see any email from Celeste McDowell / box, and I do not see anything from Sharon Norwood.

I also have a few questions regarding Defendants updated privilege log, which I hope will facilitate productive exchanges between the parties on this issue:

- Have Defendants updated any of the "Privilege Note" comments in the log? If so, is there any way for Plaintiffs to see what changes were made to the privilege log, for example in a redline? I could not tell based on my initial review, and it is thus difficult to see where the parties may have found some common ground, which I think would greatly expedite our discussions of this issue.
- The second updated privilege log has 464 entries, whereas the original had 468. I understand you already produced on 1/17/23 6 documents that were on the original log, and your email indicates you are intending to produce more this evening. Does this mean some entries were added to the log, and is there any indication of which ones are new? Or are you expecting plaintiffs to manually compare the documents entry-by-entry to discover which entries are new?
- Also, if there are new entries, can Defendants clarify the reason for these additions and if, and on what timeline, defendants expect they may have more?

Many thanks,

Hilary Harris Klein
hilaryhklein@scsj.org

From: Shawn Sheehy <ssheehy@HoltzmanVogel.com>
Sent: Friday, January 20, 2023 8:05 PM
To: Hilary Harris Klein <hilaryhklein@scsj.org>
Cc: Joseph Russo <JRusso@greerherz.com>; Jason Torchinsky <jtorchinsky@HoltzmanVogel.com>; Jordan Raschke Elton <jraschkeelton@greerherz.com>; Bernadette Reyes <bernadette@uclavrp.org>; Mark Gaber <MGaber@campaignlegalcenter.org>; neil@ngbaronlaw.com; Simone Leeper <SLeeper@campaignlegalcenter.org>; Sonni Waknin <sonni@uclavrp.org>; Valencia Richardson <VRichardson@campaignlegalcenter.org>; Alexandra Copper <ACopper@campaignlegalcenter.org>; Chad Dunn <chad@brazilanddunn.com>; Adrianne Spoto <Adrianne@scsj.org>; asilberstein@willkie.com; Vall-llobera, Diana <DVall-llobera@willkie.com>; Hani Mirza <hani@texascivilrightsproject.org>; Joaquin Gonzalez <joaquin@texascivilrightsproject.org>; jsuriani@willkie.com; Garrett, Kathryn <KGarrett@willkie.com>; Polizzano, Michelle <mpolizzano@willkie.com>; Zhu, Molly <mzhu@willkie.com>; nas@naslegal.com; rmancino@willkie.com; Sarah Chen <schen@texascivilrightsproject.org>; Gear, Bruce (CRT) <Bruce.Gear@usdoj.gov>; Meza, Catherine (CRT) <Catherine.Meza@usdoj.gov>; daniel.hu@usdoj.gov; Dallin Holt <dholt@HoltzmanVogel.com>; jennifer.lowery@usdoj.gov; Robert.Berman@usdoj.gov; Newkirk, Zachary (CRT) <Zachary.Newkirk@usdoj.gov>; Jayaraman, Tharuni (CRT) <Tharuni.Jayaraman@usdoj.gov>
Subject: RE: [External]Petteway v. Galveston County - 3:22cv57 - Consolidated Defendants' Privilege Log

Hilary,

Good evening. Please find attached Defendants' updated privilege log.

Defendants reviewed all documents contained on the privilege log, reviewed all descriptions on the privilege log, and removed documents from the privilege log that have been produced. We have also made an additional production this evening removing additional documents from the privilege log. I don't believe a password is required for that production. If one is required, we will obtain it for you.

Defendants will respond to the issues raised in the discovery dispute letter by COB Monday, as requested.

Thank you,

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From: Hilary Harris Klein <hilaryhklein@scsj.org>
Sent: Friday, January 20, 2023 10:24 AM
To: Shawn Sheehy <ssheehy@HoltzmanVogel.com>
Cc: Joseph Russo <JRusso@greerherz.com>; Jason Torchinsky <jtorchinsky@HoltzmanVogel.com>; Jordan Raschke Elton <jraschkeelton@greerherz.com>; Bernadette Reyes <bernadette@uclavrp.org>; Mark Gaber <MGaber@campaignlegalcenter.org>; neil@ngbaronlaw.com; Simone Leeper <SLeeper@campaignlegalcenter.org>; Sonni Waknin <sonni@uclavrp.org>; Valencia Richardson <VRichardson@campaignlegalcenter.org>; Alexandra Copper <ACopper@campaignlegalcenter.org>; Chad Dunn <chad@brazilanddunn.com>; Adrianne Spoto <Adrianne@scsj.org>; asilberstein@willkie.com; Vall-llobera, Diana <DVall-llobera@willkie.com>; Hani Mirza <hani@texascivilrightsproject.org>; Joaquin Gonzalez <joaquin@texascivilrightsproject.org>; jsuriani@willkie.com; Garrett, Kathryn <KGarrett@willkie.com>; Polizzano, Michelle <mpolizzano@willkie.com>; Zhu, Molly <mzhu@willkie.com>; nas@naslegal.com; rmancino@willkie.com; Sarah Chen <schen@texascivilrightsproject.org>; Gear, Bruce (CRT) <Bruce.Gear@usdoj.gov>; Meza, Catherine (CRT) <Catherine.Meza@usdoj.gov>; daniel.hu@usdoj.gov; Dallin Holt <dholt@HoltzmanVogel.com>; jennifer.lowery@usdoj.gov; Robert.Berman@usdoj.gov; Newkirk, Zachary (CRT) <Zachary.Newkirk@usdoj.gov>; Jayaraman, Tharuni (CRT) <Tharuni.Jayaraman@usdoj.gov>
Subject: RE: [External]Petteway v. Galveston County - 3:22cv57 - Consolidated Defendants' Privilege Log

Shawn,

Thank you again for your time last week to meet and confer on this issue. Plaintiffs have not received the updated privilege log notes that Defendants agreed to provide by Monday, January 16, in our meet and confer. We also note that, to date, Defendants have only produced 6 of the communications on the privilege log for which Plaintiffs have challenged the asserted privilege, and not the 20 – 30 communications you forecasted. Please confirm whether, and on what timeline, Defendants will be producing additional communications from the privilege log.

As we understand the parties still have a disagreement regarding Defendants' assertion of privilege over 347 communications listed in the privilege log, we have attached a joint dispute letter for submission to the Court on this

issue. Plaintiffs' section is 328 words, and we ask that Defendants insert a section of substantially the same length (which should keep it to 2 pages) by close of business Monday, January 23.

Kind regards,

Hilary

Hilary Harris Klein
Pronouns: She, Her, Hers

Senior Counsel for Voting Rights
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From: Shawn Sheehy <ssheehy@HoltzmanVogel.com>
Sent: Monday, January 9, 2023 5:48 PM
To: Hilary Harris Klein <hilaryhklein@scsj.org>
Cc: Joseph Russo <JRusso@greerherz.com>; Jason Torchinsky <jtorchinsky@HoltzmanVogel.com>; Jordan Raschke Elton <jraschkeelton@greerherz.com>; Bernadette Reyes <bernadette@uclavrp.org>; Mark Gaber <MGaber@campaignlegalcenter.org>; neil@ngbaronlaw.com; Simone Leeper <SLeeper@campaignlegalcenter.org>; Sonni Waknin <sonni@uclavrp.org>; Valencia Richardson <VRichardson@campaignlegalcenter.org>; Alexandra Copper <ACopper@campaignlegalcenter.org>; Chad Dunn <chad@brazilanddunn.com>; Adrianne Spoto <Adrianne@scsj.org>; asilberstein@willkie.com; Vall-llobera, Diana <DVall-llobera@willkie.com>; Hani Mirza <hani@texascivilrightsproject.org>; Joaquin Gonzalez <joaquin@texascivilrightsproject.org>; jsuriani@willkie.com; Garrett, Kathryn <KGarrett@willkie.com>; Polizzano, Michelle <mpolizzano@willkie.com>; Zhu, Molly <mzhu@willkie.com>; nas@naslegal.com; rmancino@willkie.com; Sarah Chen <schen@texascivilrightsproject.org>; Gear, Bruce (CRT) <Bruce.Gear@usdoj.gov>; Meza, Catherine (CRT) <Catherine.Meza@usdoj.gov>; daniel.hu@usdoj.gov; Dallin Holt <dholt@HoltzmanVogel.com>; jennifer.lowery@usdoj.gov; Robert.Berman@usdoj.gov; Newkirk, Zachary (CRT) <Zachary.Newkirk@usdoj.gov>; Jayaraman, Tharuni (CRT) <Tharuni.Jayaraman@usdoj.gov>
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Hilary,

My obligations under the Rules are to meet and confer with opposing counsel to make efforts to see if we can come to an agreement and avoid litigation. I have consistently made every effort on meet and confer calls to find areas of agreement and avoid litigation. I will continue to do that with our call on Thursday.

The Rules do not require me to commit to providing opposing counsel a list of challenge categories and/or specific documents that we will no longer assert privilege or go through all 465 entries to provide a line-by-line response to the hundreds of objections Plaintiffs have lodged and all before 3pm central on Thursday.

As I have been in the past, I will be prepared to have a discussion with Plaintiffs about Plaintiffs' objections. Without waiving our assertion of privilege, in the spirit of compromise, I will be prepared to discuss the possibility of turning over some documents. Additionally, I will be prepared to explain why some documents should remain privileged and will not be turned over.

Thank you and talk to you on Thursday.

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From: Hilary Harris Klein <hilaryhklein@scsj.org>
Sent: Monday, January 9, 2023 12:30 PM
To: Shawn Sheehy <ssheehy@HoltzmanVogel.com>
Cc: Joseph Russo <JRusso@greerherz.com>; Jason Torchinsky <jtorchinsky@HoltzmanVogel.com>; Jordan Raschke Elton <jraschkeelton@greerherz.com>; Bernadette Reyes <bernadette@uclavrp.org>; Mark Gaber <MGaber@campaignlegalcenter.org>; neil@ngbaronlaw.com; Simone Leeper <SLeeper@campaignlegalcenter.org>; Sonni Waknin <sonni@uclavrp.org>; Valencia Richardson <VRichardson@campaignlegalcenter.org>; Alexandra Copper <ACopper@campaignlegalcenter.org>; Chad Dunn <chad@brazilanddunn.com>; Adrianne Spoto <Adrianne@scsj.org>; asilberstein@willkie.com; Vall-llobera, Diana <DVall-llobera@willkie.com>; Hani Mirza <hani@texascivilrightsproject.org>; Joaquin Gonzalez <joaquin@texascivilrightsproject.org>; jsuriani@willkie.com; Garrett, Kathryn <KGarrett@willkie.com>; Polizzano, Michelle <mpolizzano@willkie.com>; Zhu, Molly <mzhu@willkie.com>; nas@naslegal.com; rmancino@willkie.com; Sarah Chen <schen@texascivilrightsproject.org>; Gear, Bruce (CRT) <Bruce.Gear@usdoj.gov>; Meza, Catherine (CRT) <Catherine.Meza@usdoj.gov>; daniel.hu@usdoj.gov; Dallin Holt <dholt@HoltzmanVogel.com>; jennifer.lowery@usdoj.gov; Robert.Berman@usdoj.gov; Newkirk, Zachary (CRT) <Zachary.Newkirk@usdoj.gov>; Jayaraman, Tharuni (CRT) <Tharuni.Jayaraman@usdoj.gov>
Subject: RE: [External]Petteway v. Galveston County - 3:22cv57 - Consolidated Defendants' Privilege Log

Shawn,

I have sent zoom credentials for Thursday 3pm CT, however I did not see a response to our two requests in my prior email, specifically that Defendants provide Plaintiffs (1) with a list of challenge categories and/or specific documents, if

any, they will no longer be asserting privilege over, and (2) should Defendants intend to submit to Plaintiffs a line-by-line response to Plaintiffs' annotated Privilege Log at any point before we seek Court guidance, that Defendants provide this line-by-line response before the meet and confer.

Can you please tell us whether Defendants agree? If not, we then request Defendants provide their earliest availability Wednesday for a meet and confer.

Finally, while we disagree with much of what you have set forth below, it does not strike me as productive to rehash these items here. I look forward to speaking with you later this week.

Kind regards,

Hilary

Hilary Harris Klein
Pronouns: She, Her, Hers

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From: Shawn Sheehy <ssheehy@HoltzmanVogel.com>
Sent: Monday, January 9, 2023 9:40 AM
To: Hilary Harris Klein <hilaryhklein@scsj.org>
Cc: Joseph Russo <JRusso@greerherz.com>; Jason Torchinsky <jtorchinsky@HoltzmanVogel.com>; Jordan Raschke Elton <jraschkeelton@greerherz.com>; Bernadette Reyes <bernadette@uclavrp.org>; Mark Gaber <MGaber@campaignlegalcenter.org>; neil@ngbaronlaw.com; Simone Leeper <SLeeper@campaignlegalcenter.org>; Sonni Waknin <sonni@uclavrp.org>; Valencia Richardson <VRichardson@campaignlegalcenter.org>; Alexandra Copper <ACopper@campaignlegalcenter.org>; Chad Dunn <chad@brazilanddunn.com>; Adrianne Spoto <Adrianne@scsj.org>; asilberstein@willkie.com; Vall-llobera, Diana <DVall-llobera@willkie.com>; Hani Mirza <hani@texascivilrightsproject.org>; Joaquin Gonzalez <joaquin@texascivilrightsproject.org>; jsuriani@willkie.com; Garrett, Kathryn <KGarrett@willkie.com>; Polizzano, Michelle <mpolizzano@willkie.com>; Zhu, Molly <mzhu@willkie.com>; nas@naslegal.com; rmancino@willkie.com; Sarah Chen <schen@texascivilrightsproject.org>; Gear, Bruce (CRT) <Bruce.Gear@usdoj.gov>; Meza, Catherine (CRT) <Catherine.Meza@usdoj.gov>; daniel.hu@usdoj.gov; Dallin Holt <dholt@HoltzmanVogel.com>; jennifer.lowery@usdoj.gov; Robert.Berman@usdoj.gov; Newkirk, Zachary (CRT) <Zachary.Newkirk@usdoj.gov>; Jayaraman, Tharuni (CRT) <Tharuni.Jayaraman@usdoj.gov>
Subject: RE: [External]Petteway v. Galveston County - 3:22cv57 - Consolidated Defendants' Privilege Log

Hilary,

Thank you.

Yes, I am available at 3pm central on Thursday. Please send the Zoom credentials.

As for the remainder of your email, Plaintiffs and Defendants negotiated the deadlines for document production in good faith. We produced election related data for all Galveston County elections going back to 2006, shapefiles for the current map, and the 2012 map back in September. Plaintiffs three sets of overly broad document requests stretching back to 1992, and demands for communications concerning the 2011 redistricting process caused much of the delay. The initial document pool was over 3 million documents. The parties negotiated Plaintiffs' overly broad document requests, developed mutually agreeable search terms, agreed to a list of custodians, and negotiated a production schedule. This paired the document set down to more than 300,000 documents. This agreement was made on October 28, 2022. Defendants then took the next six weeks to review more than 300,000 documents. We have not delayed in anyway. In fact, it is Defendants who have afforded considerable accommodations to Plaintiffs. We could have simply filed objections to Plaintiffs' document requests as overly broad and unduly burdensome and argued it in Court. But we did not. We instead have collaborated with Plaintiffs in good faith and produced the requested documents.

We also negotiated that the privilege log was due within a couple of weeks after the last production. Plaintiffs suggested a rolling privilege log to accompany the rolling document production but that was not part of the final agreement. Defendants abided by the agreement and produce the log on December 31.

As for correcting the privilege log, nothing of substance was changed on the log. Some dates of shapefiles were missing, but not the description of what the document was and why it was being withheld. My apologies for that mistake, but I don't see how that disrupted Plaintiffs ability to object to Defendants' privilege assertions.

Finally, I have never seen a request for the native version of a privilege log. Obviously, Plaintiffs were able to convert the PDF to an excel. I don't see how the initial lack of a native version of a privilege log disrupted Plaintiffs' ability to review the privilege log and make objections.

Thank you.

Shawn Sheehy
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it sufficient to avoid tax-related penalties. If desired, Holtzman Vogel, PLLC would be pleased to perform the requisite research and provide you with a detailed written analysis. Such an engagement may be the subject of a separate engagement letter that would define the scope and limits of the desired consultation services.

From: Hilary Harris Klein <hilaryhklein@scsj.org>
Sent: Sunday, January 8, 2023 1:37 PM
To: Shawn Sheehy <ssheehy@HoltzmanVogel.com>
Cc: Joseph Russo <JRusso@greerherz.com>; Jason Torchinsky <jtorchinsky@HoltzmanVogel.com>; Jordan Raschke Elton <jraschkeelton@greerherz.com>; Bernadette Reyes <bernadette@uclavrp.org>; Mark Gaber <MGaber@campaignlegalcenter.org>; neil@ngbaronlaw.com; Simone Leeper <SLeeper@campaignlegalcenter.org>; Sonni Waknin <sonni@uclavrp.org>; Valencia Richardson <VRichardson@campaignlegalcenter.org>; Alexandra Copper <ACopper@campaignlegalcenter.org>; Chad Dunn <chad@brazilanddunn.com>; Adrianne Spoto <Adrianne@scsj.org>; asilberstein@willkie.com; Vall-llobera, Diana <DVall-llobera@willkie.com>; Hani Mirza <hani@texascivilrightsproject.org>; Joaquin Gonzalez <joaquin@texascivilrightsproject.org>; jsuriani@willkie.com; Garrett, Kathryn <KGarrett@willkie.com>; Polizzano, Michelle <mpolizzano@willkie.com>; Zhu, Molly <mzhu@willkie.com>; nas@naslegal.com; rmancino@willkie.com; Sarah Chen <schen@texascivilrightsproject.org>; Gear, Bruce (CRT) <Bruce.Gear@usdoj.gov>; Meza, Catherine (CRT) <Catherine.Meza@usdoj.gov>; daniel.hu@usdoj.gov; Dallin Holt <dholt@HoltzmanVogel.com>; jennifer.lowery@usdoj.gov; Robert.Berman@usdoj.gov; Newkirk, Zachary (CRT) <Zachary.Newkirk@usdoj.gov>; Jayaraman, Tharuni (CRT) <Tharuni.Jayaraman@usdoj.gov>
Subject: RE: [External]Petteway v. Galveston County - 3:22cv57 - Consolidated Defendants' Privilege Log

Shawn,

With apologies for multiple emails, I misread your initial availability as Wednesday 3pm CT instead of Thursday 3pm CT.

Plaintiffs are available Wednesday 3pm CT as well as Thursday 3pm CT for a meet and confer, and I will send zoom credentials for the earliest possible time Defendants are available.

Kind regards,

Hilary

Hilary Harris Klein
hilaryhklein@scsj.org

Shawn,

Plaintiffs are available Wednesday 3pm Central for a meet and confer and I will send zoom credentials momentarily to all counsel.

In light of the additional time before we meet, Plaintiffs request that Defendants come prepared (1) with a list of challenge categories and/or specific documents, if any, they will no longer be asserting privilege over, and (2) should Defendants intend to submit to Plaintiffs a line-by-line response to Plaintiffs' annotated Privilege Log at any point before we seek Court guidance, that Defendants provide this line-by-line response before the meet and confer.

We request these two items to ensure that the meet and confer is as productive as possible. We also note in making these requests that Plaintiffs have afforded in good faith considerable accommodations to Defendants throughout this process, including for the timing of rolling productions and the December 31 deadline for a privilege log in response to Plaintiffs' August requests. As you may remember, when NAACP Plaintiffs sought to confer with Defendants regarding privilege issues last year, Defendants asserted it would not be productive until documents were produced. Yet Defendants then decided not to provide rolling privilege logs with their rolling productions, and instead opted to provide a 108 page and 468-entry privilege log on December 31. This log had to be corrected on January 2 and was provided in PDF format instead of the native format that would more expeditiously facilitate Plaintiffs' annotating the privilege log to facilitate

conference. The two requests above thus ensure that, in light of these factors, the parties are able to meaningfully confer on Wednesday without further delay in resolving these issues with the Court, if that becomes necessary.

Kind regards,

Hilary Harris Klein
Pronouns: She, Her, Hers

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From: Shawn Sheehy <ssheehy@HoltzmanVogel.com>
Sent: Saturday, January 7, 2023 3:55 PM
To: Hilary Harris Klein <hilaryhklein@scsj.org>
Cc: Joseph Russo <JRusso@greerherz.com>; Jason Torchinsky <jtorchinsky@HoltzmanVogel.com>; Jordan Raschke Elton <jraschkeelton@greerherz.com>; Bernadette Reyes <bernadette@uclavrp.org>; Mark Gaber <MGaber@campaignlegalcenter.org>; neil@ngbaronlaw.com; Simone Leeper <SLeeper@campaignlegalcenter.org>; Sonni Waknin <sonni@uclavrp.org>; Valencia Richardson <VRichardson@campaignlegalcenter.org>; Alexandra Copper <ACopper@campaignlegalcenter.org>; Chad Dunn <chad@brazilanddunn.com>; Adrianne Spoto <Adrianne@scsj.org>; asilberstein@willkie.com; Vall-llobera, Diana <DVall-llobera@willkie.com>; Hani Mirza <hani@texascivilrightsproject.org>; Joaquin Gonzalez <joaquin@texascivilrightsproject.org>; jsuriani@willkie.com; Garrett, Kathryn <KGarrett@willkie.com>; Polizzano, Michelle <mpolizzano@willkie.com>; Zhu, Molly <mzhu@willkie.com>; nas@naslegal.com; rmancino@willkie.com; Sarah Chen <schen@texascivilrightsproject.org>; Gear, Bruce (CRT) <Bruce.Gear@usdoj.gov>; Meza, Catherine (CRT) <Catherine.Meza@usdoj.gov>; daniel.hu@usdoj.gov; Dallin Holt <dholt@HoltzmanVogel.com>; jennifer.lowery@usdoj.gov; Robert.Berman@usdoj.gov; Newkirk, Zachary (CRT) <Zachary.Newkirk@usdoj.gov>; Jayaraman, Tharuni (CRT) <Tharuni.Jayaraman@usdoj.gov>
Subject: RE: [External]Petteway v. Galveston County - 3:22cv57 - Consolidated Defendants' Privilege Log

Hilary,

Thank you.

I propose that we discuss Plaintiffs' objections to Defendants' privilege log on either Thursday afternoon at 3pm central or Friday, anytime after 12 noon central.

I propose this for two reasons:

First, I am not available at the times you propose on Monday or Tuesday.

Second, I also think it is prudent for the Parties to wait until later next week to have a meet and confer. We will likely receive guidance from the Court on our privilege issues this coming week. The Court's ruling on our pending discovery letter will better inform our meet and confer discussion.

Thank you very much,

Shawn Sheehy
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From: Hilary Harris Klein <hilaryhklein@scsj.org>
Sent: Friday, January 6, 2023 3:19 PM
To: Shawn Sheehy <ssheehy@HoltzmanVogel.com>
Cc: Joseph Russo <JRusso@greerherz.com>; Jason Torchinsky <jtorchinsky@HoltzmanVogel.com>; Jordan Raschke Elton <jraschkeelton@greerherz.com>; Bernadette Reyes <bernadette@uclavrp.org>; Mark Gaber <MGaber@campaignlegalcenter.org>; neil@ngbaronlaw.com; Simone Leeper <SLeeper@campaignlegalcenter.org>; Sonni Waknin <sonni@uclavrp.org>; Valencia Richardson <VRichardson@campaignlegalcenter.org>; Alexandra Copper <ACopper@campaignlegalcenter.org>; Chad Dunn <chad@brazilanddunn.com>; Adrianne Spoto <Adrianne@scsj.org>; asilberstein@willkie.com; Vall-llobera, Diana <DVall-llobera@willkie.com>; Hani Mirza <hani@texascivilrightsproject.org>; Joaquin Gonzalez <joaquin@texascivilrightsproject.org>; jsuriani@willkie.com; Garrett, Kathryn <KGarrett@willkie.com>; Polizzano, Michelle <mpolizzano@willkie.com>; Zhu, Molly <mzhu@willkie.com>; nas@naslegal.com; rmancino@willkie.com; Sarah Chen <schen@texascivilrightsproject.org>; Gear, Bruce (CRT) <Bruce.Gear@usdoj.gov>; Meza, Catherine (CRT) <Catherine.Meza@usdoj.gov>; daniel.hu@usdoj.gov; Dallin Holt <dholt@HoltzmanVogel.com>; jennifer.lowery@usdoj.gov; Robert.Berman@usdoj.gov; Newkirk, Zachary (CRT) <Zachary.Newkirk@usdoj.gov>; Jayaraman, Tharuni (CRT) <Tharuni.Jayaraman@usdoj.gov>
Subject: RE: [External]Petteway v. Galveston County - 3:22cv57 - Consolidated Defendants' Privilege Log

Dear Shawn,

We have had the opportunity to review the revised privilege log provided by Defendants on January 2, 2022. We have identified several areas of concern in the log that we raise here in an effort to resolve these issues without the need to involve the Court. To facilitate our discussions, we have attached an Excel transcription of the privilege log (which we converted from the pdf you provided), with columns featuring challenges and brief

explanations of why certain documents are not privileged and should be produced. The legal basis for each challenge category is included below my signature.

We propose a meet-and-confer during one of the following time ranges to help resolve these issues: Monday 3-5pm CT, or Tuesday 8-9am CT.

Kind regards,

Hilary

Privilege Challenge categories:

WP - Legislative Exception: "[D]ocuments created in the ordinary course of drafting legislation—including redistricting legislation—are not covered by the work product doctrine, even when the Legislature may have reasonably believed that litigation would result from its redistricting efforts." *LULAC v. Abbott*, No. EP-21-CV-00259-DCG-JES-JVB, 2022 U.S. Dist. LEXIS 144545, at *16 (W.D. Tex. Aug. 12, 2022) (internal quotations omitted) (granting motion to compel documents withheld due to work product doctrine). "That is 'because the legislature could *always* have a reasonable belief that *any* of its enactments would result in litigation.'" *Id.* (emphasis in original) (quoting *Bethune-Hill v. Va. State Bd. of Elections*, 114 F. Supp. 3d 323, 348 (E.D. Va. 2015)).

WP – Misc.: Where the primary motivation was not to aid in future litigation, since, to be covered by the work-product doctrine, "'the primary motivating purpose' behind the creation of the document must be to aid in possible future litigation." *SEC v. Microtune, Inc.*, 258 F.R.D. 310, 318 (N.D. Tex. 2009) (quoting *In re Kaiser Aluminum & Chem Co.*, 214 F.3d 586, 593 (5th Cir. 2000)).

A/C – Legal Advice Not Primary Purpose: "A communication must be for the *primary* purpose of *legal* advice for attorney-client privilege to attach. So documents that are instead concerning advice on political, strategic or policy issues are not shielded from disclosure by the attorney-client privilege." *LULAC v. Abbott*, No. EP-21-CV-00259-DCG-JES-JVB, 2022 U.S. Dist. LEXIS 144545, at *14 (W.D. Tex. Aug. 12, 2022) (cleaned up, internal citations omitted); *see also LULAC v. Abbott*, 342 F.R.D. 227, 232 (W.D. Tex. 2022). For dual-purpose documents—those that serve both legal-advice and political, strategic, or technical purposes—if the primary purpose is unclear the court may order *in camera* review to determine their purpose. *LULAC v. Abbott*, No. EP-21-CV-00259-DCG-JES-JVB, 2022 U.S. Dist. LEXIS 131217, at *27–28, 31–32 (W.D. Tex. July 25, 2022).

A/C – Boilerplate/Conclusory: "Under federal common law, the party invoking attorney-client privilege must prove: (1) that he made a confidential communication; (2) to a lawyer or his subordinate; (3) for the primary purpose of securing either a legal opinion or legal services, or assistance in some legal proceeding." *LULAC v. Abbott*, No. EP-21-CV-00259-DCG-JES-JVB, 2022 U.S. Dist. LEXIS 144545, at *12 (W.D. Tex. Aug. 12, 2022) (internal quotations omitted). "The proponent has the burden of demonstrating how each document satisfies all three elements of the privilege." *Id.* at *12-13 (cleaned up) (internal quotations omitted). "[C]ourts have stated that simply describing a lawyer's advice as 'legal,' without more, is conclusory and insufficient to carry out the proponent's burden of establishing attorney-client privilege." *EEOC v. BDO USA, L.L.P.*, 876 F.3d 690, 696 (5th Cir. 2017)

A/C – Underlying Facts: "[F]acts within the client's knowledge are not protected by the attorney-client privilege, 'even if the client learned those facts through communications with counsel.'" *LULAC v. Abbott*, No. EP-21-CV-00259-DCG-JES-JVB, 2022 U.S. Dist. LEXIS 144545, at *14 (W.D. Tex. Aug. 12, 2022); *see also LUPE v. Abbott*, SA-21-CV-00844-XR, 2022 U.S. Dist. LEXIS 93601, 2022 WL 1667687, at *7 (W.D. Tex. May 25, 2022). Likewise, "[d]ocuments do not become cloaked with the lawyer-client privilege merely by the fact of their being passed from client to lawyer." *LULAC v. Abbott*, No. EP-21-CV-00259-DCG-JES-JVB,

2022 U.S. Dist. LEXIS 131217, at *23 (W.D. Tex. July 25, 2022) (quoting *United States v. Robinson*, 121 F.3d 971, 975 (5th Cir. 1997)).

A/C – Logistical and Scheduling Documents:"[C]alendar entries and other scheduling materials relating to redistricting" are not categorically covered by the attorney-client privilege. *LULAC v. Abbott*, No. EP-21-CV-00259-DCG-JES-JVB, 2022 U.S. Dist. LEXIS 131217, at *23–24 (W.D. Tex. July 25, 2022). As with factual documents, to the extent "any annotations implicate bona fide legal advice or contain privileged material," the solution is to produce a redacted copy, not to withhold the document. *Id.* at *24.

A/C – Third Parties, or Third-Party (Thomas Bryan) or Third-Party (Neil Baron): "Under federal common law, the party invoking attorney-client privilege must prove: (1) that he made a confidential communication; (2) to a lawyer or his subordinate; (3) for the primary purpose of securing either a legal opinion or legal services, or assistance in some legal proceeding." *LULAC v. Abbott*, No. EP-21-CV-00259-DCG-JES-JVB, 2022 U.S. Dist. LEXIS 144545, at *12 (W.D. Tex. Aug. 12, 2022) (internal quotations omitted). We understand Thomas Bryan was the map-drawer hired by the county to fulfill a legislative function of drafting the maps. We understand Neil Baron did not serve as counsel for the County in the 2011 redistricting cycle, though he may have served as counsel for an individual Commissioner; therefore, we require an explanation of the *County*'s assertion of privilege over these documents.

A/C – Scope of Representation: Communications describing the scope of representation are not covered by the attorney-client privilege. *See, e.g.*, *Realtime Data, LLC v. Packeteer, Inc.*, No. 6:08-cv-144, 2009 U.S. Dist. LEXIS 132189, at *23 (E.D. Tex. May 8, 2009); *United States v. Moazzeni*, 906 F. Supp. 2d 505, 514 (E.D. Va. 2012).

A/C – Waiver: The attorney-client privilege may be waived when privileged material is shared outside the privileged relationship, and "disclosure of any significant portion of a confidential communication waives the privilege as to the whole." *See, e.g.*, *United States v. El Paso Co.*, 682 F.2d 530, 538 (5th Cir. 1982); *T&W Holding Co., LLC v. City of Kemah*, No. 3:22-cv-00007, 2022 U.S. Dist. LEXIS 206798 (S.D. Tex. Nov. 15, 2022) (privilege waived over documents produced to the opposing party).

Hilary Harris Klein
Pronouns: She, Her, Hers

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From: Shawn Sheehy <ssheehy@HoltzmanVogel.com>
Sent: Monday, January 2, 2023 10:55 PM
To: Hilary Harris Klein <hilaryhklein@scsj.org>; Dallin Holt <dholt@HoltzmanVogel.com>; Bernadette Reyes <bernadette@uclavrp.org>; Mark Gaber <MGaber@campaignlegalcenter.org>; neil@ngbaronlaw.com; Simone Leeper <SLeeper@campaignlegalcenter.org>; Sonni Waknin <sonni@uclavrp.org>; Valencia Richardson <VRichardson@campaignlegalcenter.org>; Alexandra Copper <ACopper@campaignlegalcenter.org>; Chad Dunn

<chad@brazilanddunn.com>; Adrianne Spoto <Adrianne@scsj.org>; asilberstein@willkie.com; Vall-llobera, Diana <DVall-llobera@willkie.com>; Hani Mirza <hani@texascivilrightsproject.org>; Joaquin Gonzalez <joaquin@texascivilrightsproject.org>; jsuriani@willkie.com; Garrett, Kathryn <KGarrett@willkie.com>; Polizzano, Michelle <mpolizzano@willkie.com>; Zhu, Molly <mzhu@willkie.com>; nas@naslegal.com; rmancino@willkie.com; Sarah Chen <schen@texascivilrightsproject.org>; Gear, Bruce (CRT) <Bruce.Gear@usdoj.gov>; Meza, Catherine (CRT) <Catherine.Meza@usdoj.gov>; daniel.hu@usdoj.gov; jennifer.lowery@usdoj.gov; Robert.Berman@usdoj.gov; Jayaraman, Tharuni (CRT) <Tharuni.Jayaraman@usdoj.gov>; Newkirk, Zachary (CRT) <Zachary.Newkirk@usdoj.gov>
Cc: Joseph Russo <JRusso@greerherz.com>; Jason Torchinsky <jtorchinsky@HoltzmanVogel.com>; Jordan Raschke Elton <jraschkeelton@greerherz.com>; Angela Olalde <aolalde@greerherz.com>
Subject: RE: [External]Petteway v. Galveston County - 3:22cv57 - Consolidated Defendants' Privilege Log

Hilary,

No, Defendants will not provide a native version of the privilege log.

Thank you,

Shawn Sheehy
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Subject: Re: [External]Petteway v. Galveston County - 3:22cv57 - Consolidated Defendants' Privilege Log

Thank you Shawn. Are Defendants able to provide a native version of the corrected document?

Hilary Harris Klein
hilaryhklein@scsj.org

From: Shawn Sheehy <ssheehy@HoltzmanVogel.com>
Sent: Monday, January 2, 2023, 9:34 PM
To: Hilary Harris Klein <hilaryhklein@scsj.org>; Dallin Holt <dholt@HoltzmanVogel.com>; Bernadette Reyes <bernadette@uclavrp.org>; Mark Gaber <MGaber@campaignlegalcenter.org>; neil@ngbaronlaw.com <neil@ngbaronlaw.com>; Simone Leeper <SLeeper@campaignlegalcenter.org>; Sonni Waknin <sonni@uclavrp.org>; Valencia Richardson <VRichardson@campaignlegalcenter.org>; Alexandra Copper <ACopper@campaignlegalcenter.org>; Chad Dunn <chad@brazilanddunn.com>; Adrianne Spoto <Adrianne@scsj.org>; asilberstein@willkie.com <asilberstein@willkie.com>; Vall-llobera, Diana <DVall-llobera@willkie.com>; Hani Mirza <hani@texascivilrightsproject.org>; Joaquin Gonzalez <joaquin@texascivilrightsproject.org>; jsuriani@willkie.com <jsuriani@willkie.com>; Garrett, Kathryn <KGarrett@willkie.com>; Polizzano, Michelle <mpolizzano@willkie.com>; Zhu, Molly <mzhu@willkie.com>; nas@naslegal.com <nas@naslegal.com>; rmancino@willkie.com <rmancino@willkie.com>; Sarah Chen <schen@texascivilrightsproject.org>; Gear, Bruce (CRT) <Bruce.Gear@usdoj.gov>; Meza, Catherine (CRT) <Catherine.Meza@usdoj.gov>; daniel.hu@usdoj.gov <daniel.hu@usdoj.gov>; jennifer.lowery@usdoj.gov <jennifer.lowery@usdoj.gov>; Robert.Berman@usdoj.gov <Robert.Berman@usdoj.gov>; Jayaraman, Tharuni (CRT) <Tharuni.Jayaraman@usdoj.gov>; Newkirk, Zachary (CRT) <Zachary.Newkirk@usdoj.gov>
Cc: Joseph Russo <JRusso@greerherz.com>; Jason Torchinsky <jtorchinsky@HoltzmanVogel.com>; Jordan Raschke Elton <jraschkeelton@greerherz.com>; Angela Olalde <aolalde@greerherz.com>
Subject: RE: [External]Petteway v. Galveston County - 3:22cv57 - Consolidated Defendants' Privilege Log

Hilary,

Happy New Year to you as well. Please find attached the privilege log with the issue you identified corrected. My apologies for that.

Thank you,

Shawn Sheehy
Holtzman Vogel Baran Torchinsky & Josefiak PLLC
Mobile:
202-941-6421

Washington DC Office
2300 N Street, NW, Ste 643-A
Washington, DC 20037
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Holtzman Vogel

HOLTZMAN VOGEL BARAN TORCHINSKY & JOSEFIAK PLLC

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From: Hilary Harris Klein <hilaryhklein@scsj.org>
Sent: Monday, January 2, 2023 9:50 AM
To: Dallin Holt <dholt@HoltzmanVogel.com>; Bernadette Reyes <bernadette@uclavrp.org>; Mark Gaber <MGaber@campaignlegalcenter.org>; neil@ngbaronlaw.com; Simone Leeper <SLeeper@campaignlegalcenter.org>; Sonni Waknin <sonni@uclavrp.org>; Valencia Richardson <VRichardson@campaignlegalcenter.org>; Alexandra Copper <ACopper@campaignlegalcenter.org>; Chad Dunn <chad@brazilanddunn.com>; Adrianne Spoto <Adrianne@scsj.org>; asilberstein@willkie.com; Vall-llobera, Diana <DVall-llobera@willkie.com>; Hani Mirza <hani@texascivilrightsproject.org>; Joaquin Gonzalez <joaquin@texascivilrightsproject.org>; jsuriani@willkie.com; Garrett, Kathryn <KGarrett@willkie.com>; Polizzano, Michelle <mpolizzano@willkie.com>; Zhu, Molly <mzhu@willkie.com>; nas@naslegal.com; rmancino@willkie.com; Sarah Chen <schen@texascivilrightsproject.org>; Gear, Bruce (CRT) <Bruce.Gear@usdoj.gov>; Meza, Catherine (CRT) <Catherine.Meza@usdoj.gov>; daniel.hu@usdoj.gov; jennifer.lowery@usdoj.gov; Robert.Berman@usdoj.gov; Jayaraman, Tharuni (CRT) <Tharuni.Jayaraman@usdoj.gov>; Newkirk, Zachary (CRT) <Zachary.Newkirk@usdoj.gov>
Cc: Joseph Russo <JRusso@greerherz.com>; Jason Torchinsky <jtorchinsky@HoltzmanVogel.com>; Shawn Sheehy <ssheehy@HoltzmanVogel.com>; Jordan Raschke Elton <jraschkeelton@greerherz.com>; Angela Olalde <aolalde@greerherz.com>
Subject: RE: [External]Petteway v. Galveston County - 3:22cv57 - Consolidated Defendants' Privilege Log

Dallin,

Happy New Year. I regret to have to reach out during the holiday, but NAACP Plaintiffs noticed that the privilege log you sent in the email below appears to be missing date data in several entries. I have included a screen shot below of page 93 as just one example.

Can Defendants please provide this document in Native (either excel or word) format at their earliest convenience? In addition to hopefully resolving this missing data issue, a native version would also help facilitate discussions between the parties regarding any disagreements on the assertion of privilege by allowing us, for example, to add on another column.

Many thanks,

Hilary

Document ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To
398	Cad	################	################			
399	Cad	################	################			
400	Cad	################	################			
401	Cad	################	################			
402	Cad	################	12/10/2021 9:27 AM			
403	Cad	################	################			
404	Cad	################	################			
405	Cad	################	12/10/2021 9:27 AM			

Hilary Harris Klein
Pronouns: She, Her, Hers

Senior Counsel for Voting Rights
Southern Coalition for Social Justice
1415 W. Hwy 54, Suite 101, Durham, NC 27707
hilaryhklein@scsj.org
scsj.org | @scsj | FB: @southerncoalition
(Admitted in NC and NY)

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From: Dallin Holt <dholt@HoltzmanVogel.com>
Sent: Saturday, December 31, 2022 11:49 PM
To: Bernadette Reyes <bernadette@uclavrp.org>; Mark Gaber <MGaber@campaignlegalcenter.org>; neil@ngbaronlaw.com; Simone Leeper <SLeeper@campaignlegalcenter.org>; Sonni Waknin <sonni@uclavrp.org>; Valencia Richardson <VRichardson@campaignlegalcenter.org>; Alexandra Copper <ACopper@campaignlegalcenter.org>; Chad Dunn <chad@brazilanddunn.com>; Adrianne Spoto <Adrianne@scsj.org>; asilberstein@willkie.com; Vall-llobera, Diana <DVall-llobera@willkie.com>; Hani Mirza <hani@texascivilrightsproject.org>; Hilary Harris Klein <hilaryhklein@scsj.org>; Joaquin Gonzalez <joaquin@texascivilrightsproject.org>; jsuriani@willkie.com; Garrett, Kathryn <KGarrett@willkie.com>; Polizzano, Michelle <mpolizzano@willkie.com>; Zhu, Molly <mzhu@willkie.com>; nas@naslegal.com; rmancino@willkie.com; Sarah Chen <schen@texascivilrightsproject.org>; Gear, Bruce (CRT) <Bruce.Gear@usdoj.gov>; Meza, Catherine (CRT) <Catherine.Meza@usdoj.gov>; daniel.hu@usdoj.gov; jennifer.lowery@usdoj.gov; Robert.Berman@usdoj.gov; Jayaraman, Tharuni (CRT) <Tharuni.Jayaraman@usdoj.gov>; Newkirk, Zachary (CRT) <Zachary.Newkirk@usdoj.gov>
Cc: Joseph Russo <JRusso@greerherz.com>; Jason Torchinsky <jtorchinsky@HoltzmanVogel.com>; Shawn Sheehy <ssheehy@HoltzmanVogel.com>; Jordan Raschke Elton <jraschkeelton@greerherz.com>; Angela Olalde <aolalde@greerherz.com>
Subject: [External]Petteway v. Galveston County - 3:22cv57 - Consolidated Defendants' Privilege Log

Counsel:

As agreed, please find attached Consolidated Defendants' Privilege Log. Hope everyone has a Happy New Year!

Thank you,

Dallin Holt
Holtzman Vogel Baran Torchinsky & Josefiak PLLC
dholt@HoltzmanVogel.com // www.HoltzmanVogel.com

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Holtzman Vogel
HOLTZMAN VOGEL BARAN TORCHINSKY & JOSEFIAK PLLC

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DISCLAIMER
Any accounting, business or tax advice contained in this communication, including attachments and enclosures, is not intended as a thorough, in-depth analysis of specific issues, nor a substitute for a formal opinion, nor is it sufficient to avoid tax-related penalties. If desired, Holtzman Vogel, PLLC would be pleased to perform the requisite research and provide you with a detailed written analysis. Such an engagement may be the subject of a separate engagement letter that would define the scope and limits of the desired consultation services.

EXHIBIT 1

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
1	Email	6/2/2011 9:58 AM	6/2/2011 9:58 AM	Galveston County Resolution	GCResolutionAdopCriteria Redistricting..doc	jnixon@bmpllp.com	Henry, Mark <Mark.Henry@co.galveston.tx.us>			Galveston County Resolution.msg		Attorney-Client	Communica ion from Judge Henry to redistricting counsel requesting legal review of draft redistricting criteria.
2	Word	6/2/2011 9:58 AM	6/2/2011 8:51 AM							GCResolutionAdopCriteria Redistricting..doc	Information Technology	Attorney-Client	Draft redistric ing criteria sent from Judge Henry to redistricting counsel for legal review.
3	Email	10/3/2011 11:58 AM	10/3/2011 11:58 AM	Information for Preclearance in Voting Procedures	Redistricting Notice-Judge's Office.pdf;REDISTRICTING GUIDELINES.pdf;Redistricting Public Notices.pdf	Nixon, Joe <jnixon@bmpllp.com>	Grady, Patricia <Patricia.Grady@co.galveston.tx.us>	Henry, Mark <Mark.Henry@co.galveston.tx.us>;Grady, Patricia <Patricia.Grady@co.galveston.tx.us>		Information for Preclearance in Voting Procedures.msg		Attorney-Client	Communica ion from Galveston County Legal Liaison to redistricting counsel responding to redistricting counsel's questions and advice re: DOJ preclearance.
4	Pdf	10/3/2011 11:58 AM	8/10/2011 2:30 PM							REDISTRICTING GUIDELINES.pdf	Information Technology	Attorney-Client	Attachment from Galveston County Legal Liaison to redistricting counsel sent in response to redistricting counsel's questions re: preclearance issues.
5	Pdf	10/3/2011 11:58 AM	10/3/2011 11:08 AM							Redistricting Notice-Judge's Office pdf		Attorney-Client	Attachment from Galveston County Legal Liaison to redistricting counsel sent in response to redistricting counsel's questions and advice re: DOJ preclearance.
6	Pdf	10/3/2011 11:58 AM	10/3/2011 11:05 AM							Redistricting Public Notices.pdf		Attorney-Client	Attachment from Galveston County Legal Liaison to redistricting counsel sent in response to redistricting counsel's questions and advice re: DOJ preclearance.
7	Email	10/7/2011 3:22 PM	10/7/2011 3:22 PM	RE: Needed information!		Grady, Patricia <Patricia.Grady@co.galveston.tx.us>	Chapman, Brandy <Brandy.Chapman@co galveston.tx.us>			RE Needed information!.msg		Attorney-Client;Work-Product	Communica ion from Galveston County Deputy Clerk to Galveston County Legal Liaison compiling documents requested by redistricting counsel for DOJ preclearance submission.
8	Pdf	10/7/2011 3:22 PM	10/7/2011 2:55 PM							08232011 pdf	chapma_b	Attorney-Client;Work-Product	Attachment containing informa ion for redistricting counsel's review and advice re: DOJ preclearance submission.
9	Pdf	10/7/2011 3:22 PM	10/7/2011 2:54 PM							08152011 pdf	chapma_b	Attorney-Client;Work-Product	Attachment containing informa ion for redistricting counsel's review and advice re: DOJ preclearance submission.
10	Pdf	10/7/2011 3:22 PM	10/7/2011 2:55 PM							08222011 pdf	chapma_b	Attorney-Client;Work-Product	Attachment containing informa ion for redistricting counsel's review and advice re: DOJ preclearance submission.
11	Pdf	10/7/2011 3:22 PM	10/7/2011 2:54 PM							08172011 pdf	chapma_b	Attorney-Client;Work-Product	Attachment containing informa ion for redistricting counsel's review and advice re: DOJ preclearance submission.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
12	Pdf	10/7/2011 3:22 PM	10/7/2011 2:54 PM							08162011 pdf	chapma_b	Attorney-Client;Work-Product	Attachment containing informa ion for redistricting counsel's review and advice re: DOJ preclearance submission.
13	Email	10/14/2011 2:14 PM	10/14/2011 2:14 PM	RE: minutes for August 30th		Grady, Patricia <Patricia.Grady@co.galveston.tx.us>	Chapman, Brandy <Brandy.Chapman@co galveston.tx.us>			RE minutes for August 30 h.msg		Attorney-Client;Work-Product	Email from Galveston County Deputy Clerk to Galveston County Legal Liaison compiling documents requested by redistricting counsel for DOJ preclearance submission.
14	Pdf	10/14/2011 2:14 PM	10/14/2011 2:09 PM							083011.pdf		Attorney-Client;Work-Product	Attachment containing informa ion for redistricting counsel's review and advice re: DOJ preclearance submission.
15	Email	10/14/2011 2:24 PM	10/14/2011 2:24 PM	RE: minutes for August 30th		Grady, Patricia <Patricia.Grady@co.galveston.tx.us>	Chapman, Brandy <Brandy.Chapman@co galveston.tx.us>			RE minutes for August 30 h.msg		Attorney-Client;Work-Product	Communica ion from Galveston County Deputy Clerk to Galveston County Legal Liaison compiling documents requested by redistricting counsel for DOJ preclearance submission.
16	Pdf	10/14/2011 2:24 PM	10/13/2011 5:42 PM							Scan001.pdf		Attorney-Client;Work-Product	Attachment containing informa ion for redistricting counsel's review and advice re: DOJ preclearance submission.
17	Email	12/21/2011 12:22 PM	12/21/2011 12:22 PM	Information for DOJ	Lette001 pdf	Holmes, Stephen <Stephen.Holmes@co.galveston.tx.us>	Reingold, Myrna <Myrna.Reingold@co.galveston.tx.us>	Nixon, Joe <jnixon@bmpllp.com>		Information for DOJ.msg		Attorney-Client;Work-Product	Communica ion from Galveston County attorney to Commissioner Holmes, copying redistricting counsel, requesting informa ion in response to request from the Department of Justice during preclearance process.
18	Pdf	12/21/2011 12:22 PM	12/21/2011 6:19 AM							Lette001.pdf		Attorney-Client;Work-Product	Attachment from Galveston County attorney to Commissioner Holmes, copying redistricting counsel; letter from Department of Justice requesting information regarding the 2011 redistricting plan for the Commissioners Court.
19	Email	12/21/2011 2:01 PM	12/21/2011 2:01 PM	Fwd: Information for DOJ		commissionerholmes@verizon.net	Holmes, Stephen <Stephen.Holmes@co.galveston.tx.us>			Fwd Information for DOJ.msg		Attorney-Client;Work-Product	Commissioner Holmes forwarding to his personal email account, communication from Galveston County attorney to Commissioner Holmes, copying redistricting counsel, requesting informa ion in response to request from the Department of Justice during preclearance process.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
20	Email	12/21/2011 3:44 PM	12/21/2011 3:44 PM	FW: Information for DOJ	Lette001 pdf	Grady, Patricia <Patricia.Grady@co.galveston.tx.us>	Reingold, Myrna <Myrna.Reingold@co.galveston.tx.us>			FW Information for DOJ.msg		Attorney-Client;Work-Product	Ms. Reingold forwarding to Galveston County Legal Liaison, her communication to Commissioner Holmes, copying redistricting counsel, requesting informa ion in response to request from the Department of Justice during preclearance process.
21	Pdf	12/21/2011 3:44 PM	12/21/2011 6:19 AM							Lette001.pdf		Attorney-Client;Work-Product	Attachment from Galveston County attorney to Galveston County Legal Liaison letter from Department of Justice requesting information regarding the 2011 redistricting plan for the Commissioners Court.
22	Email	8/22/2012 12:25 PM	8/22/2012 12:25 PM	FW: Voting Precincts (Splits)	House of Representatives Splits.xls;2012 vo ing, commissioner precincts (splits).xlsx;PCT-BY-COMM-04.xls;2012 Voting Precincts, Draft.xlsx	jnixon@bmpllp.com	Fitzgerald, Mike <Mike.Fitzgerald@co.galveston.tx.us>	Henry, Mark <Mark.Henry@co.galveston.tx.us>		FW Voting Precincts (Splits).msg		Attorney-Client	Communica ion from Galveston County GIS Engineer to redistricting counsel for legal review re: commissioner court precinct splits, vo ing precinct splits, and draft scenario to resolve the splits.
23	Excel	8/22/2012 12:25 PM	8/22/2012 11:31 AM							2012 voting, commissioner precincts (splits).xlsx	sigler_n	Attorney-Client	Attachment included in communication from Galveston County GIS Engineer to redistricting counsel for legal review re: commissioner court precinct splits.
24	Excel	8/22/2012 12:25 PM	8/22/2012 11:37 AM							2012 Voting Precincts, Draft.xlsx	sigler_n	Attorney-Client	Attachment included in communication from Galveston County GIS Engineer to redistricting counsel for legal review re: voting precinct splits.
25	Excel	8/22/2012 12:25 PM	8/22/2012 11:34 AM							House of Representatives Splits.xls	Information Technology	Attorney-Client	Attachment included in communication from Galveston County GIS Engineer to redistricting counsel for legal review re: split voter precincts in House of Representatives Proposal.
26	Excel	8/22/2012 12:25 PM	9/27/2001 2:24 PM							PCT-BY-COMM-04.xls	HOLCOM_P	Attorney-Client	Attachment included in communication from Galveston County GIS Engineer to redistricting counsel for legal review re: proposed resolution of splits.
27	Email	12/19/2013 3:28 PM	12/19/2013 3:28 PM	Petteway	No ice of Expiration Of Consent Decree.pdf;Consent Decree.pdf	Nixon, Joe <jnixon@bmpllp.com>;Trey Trainor <ttrainor@bmpllp.com>	Willey, Barry <Barry.Willey@co.galveston.tx.us>	Boemer, Bob <Bob.Boemer@co.galveston.tx.us>		Petteway.msg		Attorney-Client;Work-Product	Communica ion from Galveston County Attorney, copying another Galveston County Attorney to redistricting counsel re: the 2007 consent decree in U.S. v. Galveston County and providing redistricting counsel with explanation of allega ions made in that case.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
28	Pdf	12/19/2013 3:28 PM	12/19/2013 3:22 PM							Consent Decree.pdf		Attorney-Client;Work-Product	Attachment to communication from Galveston County Attorney to redistricting counsel re: the filed consent decree.
29	Pdf	12/19/2013 3:28 PM	12/19/2013 3:22 PM							Notice of Expiration Of Consent Decree.pdf		Attorney-Client;Work-Product	Attachment to communication from Galveston County Attorney to redistricting counsel containing the filed notice of expiration of consent decree.
30	Email	12/19/2013 5:58 PM	12/19/2013 5:58 PM	Re: Petteway		Willey, Barry <Barry.Willey@co.galveston.tx.us>	Nixon, Joe <jnixon@bmpllp.com>			Re Petteway.msg		Attorney-Client;Work-Product	Communica ion from redistricting counsel to Galveston County attorney with follow-up questions re: consent decree litigation.
31	Email	12/20/2013 8:29 AM	12/20/2013 8:29 AM	RE: Petteway		Nixon, Joe <jnixon@bmpllp.com>	Willey, Barry <Barry.Willey@co.galveston.tx.us>	Boemer, Bob <Bob.Boemer@co.galveston.tx.us>		RE Petteway.msg		Attorney-Client;Work-Product	Communica ion from Galveston County Attorney, copying another Galveston County Attorney, to redistricting counsel answering redistricting counsel's follow-up questions.
32	Email	12/27/2016 1:38 PM	12/27/2016 1:38 PM	FW: EEOC	460-2017-00745.York.F5.pdf	Willey, Barry <Barry.Willey@co.galveston.tx.us>;Aguillon, Francis <Francis.Aguillon@co.galveston.tx.us>	Boemer, Bob <Bob.Boemer@co.galveston.tx.us>			FW EEOC.msg		Attorney-Client;PII;Work-Product	Communica ion from Galveston County Attorney to another Galveston County Attorney and Galveston County Legal Assistant re: fact-finding communications with Galveston County employee re: pending EEOC compliant.
33	Pdf	12/27/2016 1:38 PM	12/27/2016 9:42 AM							460-2017-00745.York.F5.pdf		Attorney-Client;PII;Work-Product	Attachment (copy of EEOC Complaint) in communication from Galveston County Attorney to another Galveston County Attorney and Galveston County Legal Assistant re: fact-finding communications with Galveston County employee re: pending EEOC complaint.
34	Email	1/3/2017 11:20 AM	1/3/2017 11:20 AM	RE: Notice of Charge of Discrimination		Branch, Katherine <Katherine.Branch@co.galveston.tx.us>;Boemer, Bob <Bob.Boemer@co.galveston.tx.us>	Willey, Barry </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=D4697108C2EF4375902F3919F53E707A-WILLEY, BAR>			RE Notice of Charge of Discrimination msg		Attorney-Client;Work-Product	Communica ion from Galveston County Attorney to another Galveston County Attorney and Galveston County Legal Assistant and Galveston County HR employee re: response to EEOC notice of complaint.
35	Email	1/3/2017 11:33 AM	1/3/2017 11:33 AM	RE: Notice of Charge of Discrimination		Willey, Barry <Barry.Willey@co.galveston.tx.us>;Boemer, Bob <Bob.Boemer@co.galveston.tx.us>				RE Notice of Charge of Discrimination msg		Attorney-Client;Work-Product	Communica ion from Galveston County Attorney to another Galveston County Attorney and Galveston County Legal Assistant re: response to EEOC notice of complaint.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
36	Email	1/3/2017 11:33 AM	1/3/2017 11:33 AM	RE: Notice of Charge of Discrimination		Willey, Barry <Barry.Willey@co.galveston.tx.us>;Boemer, Bob <Bob.Boemer@co.galveston.tx.us>	Branch, Katherine <Katherine.Branch@co.galveston.tx.us>			RE Notice of Charge of Discrimination msg		Attorney-Client;Work-Product	Communica ion from Galveston County Attorney to another Galveston County Attorney and Galveston County Legal Assistant and Galveston County HR employee re: response to EEOC notice of complaint.
37	Email	1/3/2017 11:33 AM	1/3/2017 11:33 AM	RE: Notice of Charge of Discrimination		Willey, Barry <Barry.Willey@co.galveston.tx.us>;Boemer, Bob <Bob.Boemer@co.galveston.tx.us>	Branch, Katherine </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=23C0D966F05249A8979076C8AA61575A-BRANCH, KAT>			RE Notice of Charge of Discrimination msg		Attorney-Client;Work-Product	Communica ion from Galveston County attorney to ano her Galveston County Attorney regarding the county's response to an EEOC notice of complaint.
38	Email	1/3/2017 11:40 AM	1/3/2017 11:40 AM	FW: Notice of Charge of Discrimination (Tiffany Burgess)	eeoc_color_seal36785399 6183098699eeoc_color_seal;460-2017-00873.Burgess.F5.pdf;NoticeOfCharge- Burgess.pdf	Moore, Dan <Dan.Moore@co.galveston.tx.us>	Willey, Barry </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=D4697108C2EF4375902F3919F53E707A-WILLEY, BAR>	Bozeman, Kelly <Kelly.Bozeman@co.galveston.tx.us>		FW Notice of Charge of Discrimination (Tiffany Burgess) msg		Attorney-Client;PII;Work-Product	Communica ion from Galveston County Attorney to another Galveston County Attorney and Galveston County Legal Assistant re: response to EEOC notice of complaint.
39	Image	1/3/2017 11:40 AM	1/3/2017 11:40 AM							eeoc_color_seal36785399 6183098699eeoc_color_seal		Attorney-Client;PII;Work-Product	EEOC emblem attached to privileged email.
40	Pdf	1/3/2017 11:40 AM	1/3/2017 11:38 AM							460-2017-00873.Burgess.F5.pdf		Attorney-Client;PII;Work-Product	Attachment contained in communication from Galveston County Attorney to Galveston County employee re: seeking information about pending EEOC Complaint. Attachment is the EEOC Complaint.
41	Pdf	1/3/2017 11:40 AM	1/3/2017 11:38 AM							NoticeOfCharge-Burgess.pdf	sshay	Attorney-Client;PII;Work-Product	Attachment contained in communication from Galveston County Attorney to Galveston County employee re: seeking information about pending EEOC Complaint. Attachment is the EEOC Notice of Charge of Discrimination.
42	Email	1/3/2017 2:12 PM	1/3/2017 2:12 PM	RE: Notice of Charge of Discrimination (Tiffany Burgess)		Willey, Barry <Barry.Willey@co.galveston.tx.us>	Bozeman, Kelly <Kelly.Bozeman@co.galveston.tx.us>			RE Notice of Charge of Discrimination (Tiffany Burgess) msg		Attorney-Client;Work-Product	Communica ion from Galveston County employee to Galveston County attorney re: informa ion for providing a response to EEOC Complaint.
43	Email	1/3/2017 4:04 PM	1/3/2017 4:04 PM	RE: Notice of Charge of Discrimination (Tiffany Burgess)		Willey, Barry <Barry.Willey@co.galveston.tx.us>	Bozeman, Kelly <Kelly.Bozeman@co.galveston.tx.us>			RE Notice of Charge of Discrimination (Tiffany Burgess) msg		Attorney-Client;Work-Product	Communica ion from Galveston County employee to Galveston County Attorney re: meeting to discuss ongoing EEOC Complaint.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
44	Email	2/8/2018 7:00 PM	2/8/2018 7:00 PM	Position Statement.coverletter	Position Statement Exhibits.pdf;Position Statement.020918.docx;Posi ion Statement.coverletter doc x	Rose, Derreck <Derreck.Rose@co.galveston.tx.us>	West, Beverly <Beverly.West@galvestoncountytx.gov>	Branch, Katherine <Katherine.Branch@galvestoncountytx.gov>		Position Statement.coverletter.msg		Attorney-Client;Work-Product	Communica ion from Galveston County Attorney to Galveston County Constable with a copy to Galveston County HR employee re: draft responses to EEOC Complaint and asking client to review.
45	Pdf	2/8/2018 7:00 PM	2/8/2018 6:51 PM							Position Statement Exhibits.pdf		Attorney-Client;Work-Product	Attachment to communication from Galveston County Attorney to Galveston County Constable with a copy to Galveston County HR employee re: draft responses to EEOC Complaint and asking client to review. Attachment is exhibits for the draft response to EEOC Complaint for client to review.
46	Word	2/8/2018 7:00 PM	2/8/2018 6:53 PM							Position Statement 020918.docx	Information Technology	Attorney-Client;Work-Product	Attachment to communication from Galveston County Attorney to Galveston County Constable with a copy to Galveston County HR employee re: draft responses to EEOC Complaint and asking client to review. Attachment is draft response to EEOC Complaint for client review.
47	Word	2/8/2018 7:00 PM	2/8/2018 6:53 PM							Position Statement.coverletter.docx	Information Technology	Attorney-Client;Work-Product	Attachment to communication from Galveston County Attorney to Galveston County Constable with a copy to Galveston County HR employee re: draft responses to EEOC Complaint and asking client to review. Attachment is draft cover letter to response to EEOC Complaint for client review.
48	Email	2/9/2018 11:02 AM	2/9/2018 11:02 AM	Williams Position Statement	Position Statement.020918.docx;Posi ion Statement Exhibits.pdf;Position Statement.coverletter doc x	Rose, Derreck <Derreck.Rose@co.galveston.tx.us>;Branch, Katherine <Katherine.Branch@galvestoncountytx.gov>	West, Beverly <Beverly.West@galvestoncountytx.gov>			Williams Position Statement msg		Attorney-Client;Work-Product	Communica ion from Galveston County Attorney to Galveston County Constable with a copy to Galveston County HR employee re: draft responses to EEOC Complaint and asking client to review.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
49	Word	2/9/2018 11:02 AM	2/8/2018 6:53 PM							Position Statement.coverletter.docx	Information Technology	Attorney-Client;Work-Product	Attachment to communication from Galveston County Attorney to Galveston County Constable with a copy to Galveston County HR employee re: draft responses to EEOC Complaint and asking client to review. Attachment is draft cover letter to response to EEOC Complaint for client review.
50	Pdf	2/9/2018 11:02 AM	2/8/2018 6:51 PM							Position Statement Exhibits.pdf		Attorney-Client;Work-Product	Attachment to communication from Galveston County Attorney to Galveston County Constable with a copy to Galveston County HR employee re: draft responses to EEOC Complaint and asking client to review. Attachment is exhibits for the draft response to EEOC Complaint for client to review.
51	Word	2/9/2018 11:02 AM	2/8/2018 6:53 PM							Position Statement 020918.docx	Information Technology	Attorney-Client;Work-Product	Attachment to communication from Galveston County Attorney to Galveston County Constable with a copy to Galveston County HR employee re: draft responses to EEOC Complaint and asking client to review. Attachment is draft response to EEOC Complaint for client to review.
52	Email	1/25/2021 2:57 PM	1/25/2021 2:57 PM	Commissioners and redistricting		Henry, Mark <Mark.Henry@co.galveston.tx.us>	Paul Ready <paul@ready.law>			Commissioners and redistricting.msg		Attorney-Client;Work-Product	Communica ion from Galveston County General Counsel to Judge Henry responding to legal inquiry about Commissioners serving under new precinct lines.
53	Email	5/20/2021 2:06 PM	5/20/2021 2:06 PM	RE: Asked and Answered!		Paul Ready <paul@ready.law>	Drummond, Tyler <Tyler.Drummond@co.galveston.tx.us>	Johnson, Cheryl E <Cheryl.E.Johnson@co.galveston.tx.us>		RE Asked and Answered!.msg		Attorney-Client;Work-Product	Communica ion from Judge Henry's Chief of Staff to Galveston County General Counsel, with a copy to Galveston County Tax Assessor re: requesting update on redistricting counsel's progress.
54	Email	5/20/2021 2:21 PM	5/20/2021 2:21 PM	Re: Asked and Answered!		Drummond, Tyler <Tyler.Drummond@co galveston.tx.us>	Paul Ready <paul@ready.law>	Johnson, Cheryl E <Cheryl.E.Johnson@co.galveston.tx.us>		Re Asked and Answered!.msg		Attorney-Client;Work-Product	Communica ion from Galveston County General Counsel to Judge Henry's Chief of Staff revealing redistricting counsel's legal strategy concerning redistricting and how that legal strategy impacts the timing of redistricting.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
55	Email	5/20/2021 2:29 PM	5/20/2021 2:29 PM	RE: Asked and Answered!		Paul Ready <paul@ready.law>	Drummond, Tyler <Tyler.Drummond@co.galveston.tx.us>	Johnson, Cheryl E <Cheryl.E.Johnson@co.galveston.tx.us>		RE Asked and Answered!.msg		Attorney-Client;Work-Product	Communica ion from Judge Henry's Chief of Staff to Galveston County General Counsel re: follow-up question concerning redistricting counsel's legal strategy concerning redistricting.
56	Email	5/20/2021 3:25 PM	5/20/2021 3:25 PM	FW: Asked and Answered!		CPA Shawn A. Johnson <sjohnson@burfordperry.com>	Johnson, Cheryl E </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=0122EFF2BE614A50B727186FEF73AC62-JOHNSON, CH>			FW Asked and Answered!.msg		Attorney-Client;Work-Product	Correspondence from Galveston County Tax Assessor to attorney seeking a second legal opinion re: redistricting counsel's legal strategy and legal opinions.
57	Email	5/20/2021 3:56 PM	5/20/2021 3:56 PM	Re: Asked and Answered!		Drummond, Tyler <Tyler.Drummond@co galveston.tx.us>	Paul Ready <paul@ready.law>	Johnson, Cheryl E <Cheryl.E.Johnson@co.galveston.tx.us>		Re Asked and Answered!.msg		Attorney-Client;Work-Product	Communica ion from Galveston County General Counsel to Judge Henry's Chief of Staff responding to Mr. Drummond's question re: redistricting counsel's legal strategy.
58	Email	9/18/2021 6:55 PM	9/18/2021 6:55 PM	Redistricting		Paul Ready <paul@ready.law>	Drummond, Tyler </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2C5F9C72E05E4D9E8437FD599C045B6E-DRUMMOND, T>			Redistricting .msg		Attorney-Client;Work-Product	Communica ion from Judge Henry's Chief of Staff to Galveston County General Counsel re: concerns about redistricting legal strategy in relation to census data, and legal questions about redistricting's interplay with county public hearing requirements.
59	Email	10/15/2021 1:24 PM	10/15/2021 1:24 PM	Re: Galveston		Jason Torchinsky <jtorchinsky@holtzmanvogel.com>;Phil Gordon <pgordon@holtzmanvogel.com>	tom@bryangeodemo.com			Re Galveston.msg		Attorney-Client;Work-Product	Communica ion from map-drawer to redistricting counsel re: preparation of first draft map for legal review and posing questions re: redistricting constitutional requirements and traditional redistric ing criteria.
60	Email	10/15/2021 1:28 PM	10/15/2021 1:28 PM	Re: Galveston		tom@bryangeodemo.com	Phil Gordon <pgordon@HoltzmanVogel.com>	Jason Torchinsky <jtorchinsky@HoltzmanVogel.com>		Re Galveston.msg		Attorney-Client;Work-Product	Communica ion from redistricting counsel to map-drawer responding to questions re: cons itutional requirements for redistricting and tradi ional redistricting criteria.
61	Email	10/17/2021 5:05 PM	10/17/2021 5:05 PM	Re: Galveston	Galveston Optimal D Plan pdf;Galveston Min Change Plan pdf;Galveston_Analysis 10_17_21.xlsx;Galveston Original Plan.pdf	Jason Torchinsky <jtorchinsky@holtzmanvogel.com>;Phil Gordon <pgordon@HoltzmanVogel.com>;Dale Oldham <dloesq@aol.com>	tom@bryangeodemo.com			0008310.eml;Re Galveston.msg		Attorney-Client;Work-Product	Communica ion from map-drawer to redistricting counsel with first drafts of redistricting plan sent to redistricting counsel for legal review.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
62	Excel	10/17/2021 5:05 PM	10/17/2021 5:02 PM							Galveston_Analysis 10_17_21 xlsx	thomas bryan	Attorney-Client;Work-Product	Communica ion from map-drawer to redistricting counsel with first drafts of redistricting plan sent to redistricting counsel for legal review: attachment, excel spreadsheet with analysis and data of first draft of redistricting plan to assist in providing legal advice.
63	Pdf	10/17/2021 5:05 PM	12/31/9999 6:00 PM							Galveston Optimal D Plan.pdf		Attorney-Client;Work-Product	Communica ion from map-drawer to redistricting counsel with first drafts of redistricting plan sent to redistricting counsel for legal review: attachment, PDF image of draft plan to assist in the provision of legal analysis and opinion.
64	Pdf	10/17/2021 5:05 PM	12/31/9999 6:00 PM							Galveston Original Plan.pdf		Attorney-Client;Work-Product	Communica ion from map-drawer to redistricting counsel with first drafts of redistricting plan sent to redistricting counsel for legal review: attachment, PDF image of Benchmark Plan to assist in the provision of legal analysis and opinion.
65	Pdf	10/17/2021 5:05 PM	12/31/9999 6:00 PM							Galveston Min Change Plan.pdf		Attorney-Client;Work-Product	Communica ion from map-drawer to redistricting counsel with first drafts of redistricting plan sent to redistricting counsel for legal review: attachment, PDF image of draft plan to assist in the provision of legal analysis and opinion.
66	Email	10/19/2021 8:50 AM	10/19/2021 8:50 AM	Galveston Deliverables	Galveston Optimal Geo Plan 10_19.pdf;Galveston Optimal D Plan 10_19.pdf;Galveston_Analysis 10_17_21.xlsx	Dale Oldham <dloesq@aol.com>	tom@bryangeodemo.com			0008337.eml;Galveston Deliverables.msg		Attorney-Client;Work-Product	Communica ion from map-drawer to redistricting counsel with attached PDF's of draft plans and analysis to assist in the provision of legal analysis and opinion.
67	Pdf	10/19/2021 8:50 AM	12/31/9999 6:00 PM							Galveston Optimal Geo Plan 10_19.pdf		Attorney-Client;Work-Product	Communica ion from map-drawer to redistricting counsel with attached PDF's of draft plans and analysis to assist in the provision of legal analysis and opinion; attached PDF of draft plan to assist in the provision of legal analysis and opinion.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
68	Excel	10/19/2021 8:50 AM	10/19/2021 8:49 AM							Galveston_Analysis 10_17_21 xlsx	thomas bryan	Attorney-Client;Work-Product	Communica ion from map-drawer to redistricting counsel with attached PDF's of draft plans and analysis to assist in the provision of legal analysis and opinion; attachment is analysis and data submitted to redistricting counsel to assist in the provision of legal analysis and opinion.
69	Pdf	10/19/2021 8:50 AM	12/31/9999 6:00 PM							Galveston Optimal D Plan 10_19.pdf		Attorney-Client;Work-Product	Communica ion from map-drawer to redistricting counsel with attached PDF's of draft plans and analysis to assist in the provision of legal analysis and opinion; attached PDF of draft plan to assist in the provision of legal analysis and opinion.
70	Email	10/19/2021 9:18 AM	10/19/2021 9:18 AM	Optimal D Map	Galveston Optimal D Plan 10_19.pdf	Dale Oldham <dloesq@aol.com>	tom@bryangeodemo.com			Optimal D Map.msg;0008338.eml		Attorney-Client;Work-Product	Communica ion from map-drawer to redistricting counsel with attached PDF of draft plan to assist in the provision of legal analysis and opinion.
71	Pdf	10/19/2021 9:18 AM	12/31/9999 6:00 PM							Galveston Optimal D Plan 10_19.pdf		Attorney-Client;Work-Product	Communica ion from map-drawer to redistricting counsel with attached PDF of draft plan to assist in the provision of legal analysis and opinion; attached PDF of draft plan to assist in the provision of legal analysis and opinion.
72	Email	10/19/2021 1:52 PM	10/19/2021 1:52 PM	Updated table	Galveston_Analysis 10_17_21.xlsx	Dale Oldham <dloesq@aol.com>	tom@bryangeodemo.com			0008350.eml;Updated table.msg		Attorney-Client;Work-Product	Communica ion from map-drawer to redistricting counsel with attached data and analysis to assist in the provision of legal analysis and opinion.
73	Excel	10/19/2021 1:52 PM	10/19/2021 1:51 PM							Galveston_Analysis 10_17_21 xlsx	thomas bryan	Attorney-Client;Work-Product	Communica ion from map-drawer to redistricting counsel with attached data and analysis to assist in the provision of legal analysis and opinion; attached Excel spreadsheet with data and analysis to assist in the provision of legal analysis and opinion.
74	Email	10/19/2021 3:04 PM	10/19/2021 3:04 PM	Optimal Geo Map	Galveston Optimal Geo Plan 10_19.pdf	Dale Oldham <dloesq@aol.com>	tom@bryangeodemo.com			0008353.eml;Optimal Geo Map.msg		Attorney-Client;Work-Product	Communica ion from map-drawer to redistricting counsel with attached PDF of map to assist in the provision of legal analysis and opinion.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
75	Pdf	10/19/2021 3:04 PM	12/31/9999 6:00 PM							Galveston Optimal Geo Plan 10_19.pdf		Attorney-Client;Work-Product	Communica ion from map-drawer to redistricting counsel with attached PDF of map to assist in the provision of legal analysis and opinion; attached PDF of draft map to assist in the provision of legal analysis and opinion.
76	Email	10/22/2021 8:45 AM	10/22/2021 8:45 AM	Please use this 10-22 file	Galveston_Analysis 10_22_21.xlsx	Dale Oldham <dloesq@aol.com>	tom@bryangeodemo.com			Please use this 10-22 file.msg;0008403.eml		Attorney-Client;Work-Product	Communica ion between map-drawer and redistricting counsel re: Zoom meeting on October 22, 2021 to discuss updated redistricting data and analysis to assist in forming legal opinion and providing analysis.
77	Excel	10/22/2021 8:45 AM	10/22/2021 8:44 AM							Galveston_Analysis 10_22_21 xlsx	thomas bryan	Attorney-Client;Work-Product	Communica ion between map-drawer and redistricting counsel re: Zoom meeting on October 22, 2021 to discuss updated redistricting data and analysis to assist in forming legal opinion and providing analysis; attachment: updated redistricting data and analysis from map-drawer to counsel to assist in he provision of legal analysis and provision of legal opinion.
78	Email	10/22/2021 4:46 PM	10/22/2021 4:46 PM	Fwd: Current Voter Count by Precinct	Galveston County Voters by Precinct August 2021.xlsx	tom@bryangeodemo.com	dloesq@aol.com;<dloesq@aol.com>			0014956.eml;Fwd Current Voter Count by Precinct.msg		Attorney-Client;Work-Product	Communica ion from redistricting counsel to map-drawer re: legal analysis of voting precincts in relation to legal requirements for voting precinct size.
79	Excel	10/22/2021 4:46 PM	8/24/2021 1:03 PM							Galveston County Voters by Precinct August 2021.xlsx	Bleyle, Angela	Attorney-Client;Work-Product	Communica ion from redistricting counsel to map-drawer re: legal analysis of voting precincts in relation to legal requirements for voting precinct size; attachment: "Registered Voters by Commissioners Precinct" and identifying number of voters by vo ing precinct.
80	Email	10/22/2021 4:54 PM	10/22/2021 4:54 PM	Fw: Fwd: Current Voter Count by Precinct	4288FFAB-0A7D-4FE7-B544-ED5F463F9235.png	Phil Gordon <pgordon@hvjt.law>	Thomas Bryan <tom@bryangeodemo.com>			Fw Fwd Current Voter Count by Precinct.msg		Attorney-Client;Work-Product	Communica ion from map-drawer to redistricting counsel, forwarding Mr. Oldham's legal analysis of voting precinct in relation to voting precinct legal requirements.
81	Image	10/22/2021 4:54 PM	12/31/9999 6:00 PM							4288FFAB-0A7D-4FE7-B544-ED5F463F9235.png		Attorney-Client;Work-Product	Attached icon to privileged email.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
82	Email	10/25/2021 4:20 PM	10/25/2021 4:20 PM	Galveston County maps		Dale Oldham <dloesq@aol.com>	Paul Ready <paul@ready.law>	Veronica Van Horn <veronica.vanhorn@co.galveston.tx.us>		0008447.eml		Attorney-Client;Work-Product	Communica ion from Galveston County General Counsel to redistricting counsel re: progress of work on drawing proposed Commissioners Court precinct maps.
83	Email	10/26/2021 12:41 PM	10/26/2021 12:41 PM	Re: Current Voter Count by Precinct		tom@bryangeodemo.com; Dale Oldham <dloesq@aol.com>	Paul Ready <paul@ready.law>	Jason Torchinsky <jtorchinsky@holtzmanvogel.com>;Phil Gordon <pgordon@holtzmanvogel.com>		0008460.eml;Re Current Voter Count by Precinct.msg		Attorney-Client;Work-Product	Communica ion from Galveston County General Counsel to redistricting counsel and map-drawer concerning legal requirements for what is needed for adoptable formats.
84	Email	10/26/2021 12:45 PM	10/26/2021 12:45 PM	Fw: Current Voter Count by Precinct		Phil Gordon <pgordon@hvjt.law>	Thomas Bryan <tom@bryangeodemo.com>			Fw Current Voter Count by Precinct.msg		Attorney-Client;Work-Product	Communica ion from map-drawer to redistricting counsel re: Galveston County General Counsel's communication concerning legal requirements for adoptable formats.
85	Email	10/26/2021 4:55 PM	10/26/2021 4:55 PM	Re: Galveston Work Products		tom@bryangeodemo.com	Phil Gordon <pgordon@HoltzmanVogel.com>	Jason Torchinsky <jtorchinsky@HoltzmanVogel.com>;Dale Oldham <dloesq@aol.com>		Re Galveston Work Products.msg;0008471.eml		Attorney-Client;Work-Product	Communica ion from redistricting counsel to map-drawer and copying redistricting counsel requesting information in specific format to assist in conducting legal analysis and forming legal opinions.
86	Email	10/26/2021 5:56 PM	10/26/2021 5:56 PM	Re: Galveston Work Products	Galveston - Map 1 Precinct Inventory - 10_26_21.docx	tom@bryangeodemo.com	Phil Gordon <pgordon@HoltzmanVogel.com>	Jason Torchinsky <jtorchinsky@HoltzmanVogel.com>;Dale Oldham <dloesq@aol.com>		Re Galveston Work Products.msg		Attorney-Client;Work-Product	Communica ion from redistricting counsel to map-drawer, copying other redistricting counsel re: revisions to draft Map 1 precinct inventory to assist in providing legal advice and forming opinions.
87	Word	10/26/2021 5:56 PM	10/26/2021 5:55 PM							Galveston - Map 1 Precinct Inventory - 10_26_21 docx	thomas bryan	Attorney-Client;Work-Product	Attachment in communication from redistricting counsel to map-drawer, copying other redistricting counsel re: revisions to draft Map 1 precinct inventory. Attachment is a precinct inventory with edits necessary to assist in providing legal advice and forming opinions.
88	Email	10/26/2021 5:56 PM	10/26/2021 5:56 PM	Re: Galveston Work Products	image001.jpg;Galveston - Map 1 Precinct Inventory - 10_26_21.docx	tom@bryangeodemo.com	Phil Gordon <pgordon@HoltzmanVogel.com>	Jason Torchinsky <jtorchinsky@HoltzmanVogel.com>;Dale Oldham <dloesq@aol.com>		0008473.eml		Attorney-Client;Work-Product	Communica ion from redistricting counsel to map-drawer, copying other redistricting counsel re: revisions to draft Map 1 precinct inventory to assist in providing legal advice and forming opinions.
89	Image	10/26/2021 5:56 PM	12/31/9999 6:00 PM							image001.jpg		Attorney-Client;Work-Product	HVBTJ Icon attached to privileged email.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
90	Word	10/26/2021 5:56 PM	10/26/2021 5:55 PM							Galveston - Map 1 Precinct Inventory - 10_26_21 docx	thomas bryan	Attorney-Client;Work-Product	Attachment in communication from redistricting counsel to map-drawer, copying other redistricting counsel re: revisions to draft Map 1 precinct inventory. Attachment is a precinct inventory with edits necessary to assist in providing legal advice and forming opinions.
91	Word	10/26/2021 6:38 PM	10/26/2021 6:38 PM							Galveston - Map 1 Precinct Inventory - 10_26_21 TB.docx	thomas bryan	Attorney-Client;Work-Product	Draft precinct inventory with redistricting counsel edits; revisions made to assist in the formulation and provision of legal advice.
92	Email	10/26/2021 6:40 PM	10/26/2021 6:40 PM	Map1 Revised	Galveston - Map 1 Precinct Inventory - 10_26_21 TB.docx	Phil Gordon <pgordon@hvjt.law>	tom@bryangeodemo.com			Map1 Revised.msg		Attorney-Client;Work-Product	Communica ion from map-drawer to redistricting counsel re: revisions to draft Map 1 precinct inventory that redistricting counsel requested to assist in the formulation and provision of legal advice.
93	Word	10/26/2021 6:40 PM	10/26/2021 6:38 PM							Galveston - Map 1 Precinct Inventory - 10_26_21 TB.docx	thomas bryan	Attorney-Client;Work-Product	Attachment in communication from map-drawer to redistricting counsel re: revisions to draft Map 1 precinct inventory that redistricting counsel requested to assist in the formulation and provision of legal advice. Attachment is a precinct inventory with edits necessary to assist in providing legal advice and forming opinions.
94	Email	10/26/2021 7:20 PM	10/26/2021 7:20 PM	Re: Map1 Revised	Galveston - Map 2 Precinct Inventory - 10_26_21 TB.docx	Phil Gordon <pgordon@HoltzmanVogel.com>	tom@bryangeodemo.com			Re Map1 Revised.msg		Attorney-Client;Work-Product	Communica ion from map-drawer to redistricting counsel re: revisions to draft Map 2 precinct inventory that redistricting counsel requested to assist in the formulation and provision of legal advice.
95	Word	10/26/2021 7:20 PM	10/26/2021 7:19 PM							Galveston - Map 2 Precinct Inventory - 10_26_21 TB.docx	thomas bryan	Attorney-Client;Work-Product	Attachment in communication from map-drawer to redistricting counsel re: revisions to draft Map 2 precinct inventory that redistricting counsel requested to assist in the formulation and provision of legal advice. Attachment is a precinct inventory with edits necessary to assist in providing legal advice and forming opinions.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
96	Email	10/26/2021 7:29 PM	10/26/2021 7:29 PM	Re: Map1 Revised	Galveston - Map 1 Precinct Inventory Final - 10_26_21.docx	Phil Gordon <pgordon@HoltzmanVogel.com>	tom@bryangeodemo.com			Re Map1 Revised.msg		Attorney-Client;Work-Product	Communica ion from map-drawer to redistricting counsel re: revisions to draft Map 1 precinct inventory that redistricting counsel requested to assist in the formulation and provision of legal advice.
97	Word	10/26/2021 7:29 PM	10/26/2021 7:29 PM							Galveston - Map 1 Precinct Inventory Final - 10_26_21 docx	thomas bryan	Attorney-Client;Work-Product	Attachment in communication from map-drawer to redistricting counsel re: revisions to draft Map 1 precinct inventory that redistricting counsel requested to assist in the formulation and provision of legal advice. Attachment is a precinct inventory with edits necessary to assist in providing legal advice and forming opinions
98	Email	10/26/2021 7:37 PM	10/26/2021 7:37 PM	Galveston Precinct Inventory	Galveston - Map 1 Precinct Inventory Final - 10_26_21.docx;image001.jpg;Galveston - Map 2 Precinct Inventory Final - 10_26_21.docx	Dale Oldham <dloesq@aol.com>	Phil Gordon <pgordon@HoltzmanVogel.com>	Jason Torchinsky <jtorchinsky@HoltzmanVogel.com>		0008474.eml		Attorney-Client;Work-Product	Communica ion from Mr. Gordon, redistricting counsel, to Mr. Oldham, redistricting counsel, forwarding precinct inventories for Map 1 and Map 2 for discussion to formulate legal advice; attachment with precinct inventory for Map 2.
99	Word	10/26/2021 7:37 PM	10/26/2021 7:26 PM							Galveston - Map 2 Precinct Inventory Final - 10_26_21 docx	thomas bryan	Attorney-Client;Work-Product	Attachment in communication from Mr. Gordon, redistricting counsel, to Mr. Oldham, redistricting counsel, forwarding precinct inventories for Map 1 and Map 2 for discussion to formulate legal advice. Attachment is precinct inventory for Map 2.
100	Word	10/26/2021 7:37 PM	10/26/2021 7:35 PM							Galveston - Map 1 Precinct Inventory Final - 10_26_21 docx	thomas bryan	Attorney-Client;Work-Product	Attachment in communication from Mr. Gordon, redistricting counsel, to Mr. Oldham, redistricting counsel, forwarding precinct inventories for Map 1 and Map 2 for discussion to formulate legal advice. Attachment is precinct inventory for Map 2.
101	Image	10/26/2021 7:37 PM	12/31/9999 6:00 PM							image001.jpg		Attorney-Client;Work-Product	HVBTJ Icon attached to privileged communica ion.
102	Email	10/26/2021 7:48 PM	10/26/2021 7:48 PM	Re: Galveston Precinct Inventory	.jpg	pgordon@HoltzmanVogel. com	<dloesq@aol.com>			0014958.eml		Attorney-Client;Work-Product	Communica ion from Mr. Oldham, redistricting counsel, to Mr. Gordon, redistricting counsel, providing legal analysis regarding formatting for adoptability, and asking question about data to provide accurate and complete legal advice to client.
103	Image	10/26/2021 7:48 PM	12/31/9999 6:00 PM							.jpg		Attorney-Client;Work-Product	HVBTJ Icon attached to privileged communica ion.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
104	Email	10/26/2021 7:55 PM	10/26/2021 7:55 PM	Re: Galveston Precinct Inventory	image001.jpg;image002.jpg	dloesq@aol.com	Phil Gordon <pgordon@HoltzmanVogel.com>	Jason Torchinsky <jtorchinsky@HoltzmanVogel.com>		0008475.eml		Attorney-Client;Work-Product	Communica ion from Mr. Gordon, redistricting counsel, to Mr. Oldham, copying Mr. Torchinsky, redistricting counsel, re: strategy for turning redistricting data into a legally adoptable format for the Commissioners Court.
105	Image	10/26/2021 7:55 PM	12/31/9999 6:00 PM							image002.jpg		Attorney-Client;Work-Product	HVBTJ Icon attached to privileged communica ion.
106	Image	10/26/2021 7:55 PM	12/31/9999 6:00 PM							image001.jpg		Attorney-Client;Work-Product	HVBTJ icon attached to privileged communica ion.
107	Email	10/26/2021 8:00 PM	10/26/2021 8:00 PM	Fwd: Galveston Precinct Inventory	Galveston - Map 1 Precinct Inventory Final - 10_26_21.docx;.jpg;Galveston - Map 2 Precinct Inventory Final - 10_26_21.docx	paul@ready.law	<dloesq@aol.com>			0014959.eml		Attorney-Client;Work-Product	Communica ion from redistricting counsel to Galveston County General Counsel concerning whether the attached documents are legally sufficient as an adoptable order for the Commissioners Court.
108	Image	10/26/2021 8:00 PM	12/31/9999 6:00 PM							.jpg		Attorney-Client;Work-Product	HVBTJ Icon attached to a privileged communica ion.
109	Word	10/26/2021 8:00 PM	10/26/2021 7:26 PM							Galveston - Map 2 Precinct Inventory Final - 10_26_21 docx	thomas bryan	Attorney-Client;Work-Product	Attachment in communication from redistricting counsel to Galveston County General Counsel concerning whether the attached documents are legal sufficient for adoptable order for the Commissioners Court. Attachment is a Map 2 precinct inventory.
110	Word	10/26/2021 8:00 PM	10/26/2021 7:35 PM							Galveston - Map 1 Precinct Inventory Final - 10_26_21 docx	thomas bryan	Attorney-Client;Work-Product	Attachment in communication from redistricting counsel to Galveston County General Counsel concerning whether the attached documents are legal sufficient for adoptable order for the Commissioners Court. Attachment is a Map 1 precinct inventory.
111	Email	10/26/2021 9:57 PM	10/26/2021 9:57 PM	Fwd: Galveston Precinct Inventory	Galveston - Map 2 Precinct Inventory Final - 10_26_21.docx;Galveston - Map 1 Precinct Inventory Final - 10_26_21.docx	Drummond, Tyler <Tyler.Drummond@co.galveston.tx.us>	Paul Ready <paul@ready.law>			Fwd Galveston Precinct Inventory.msg		Attorney-Client;Work-Product	Communica ion from Galveston County General Counsel to Mr. Drummond re: what Mr. Ready will send to demonstrate what is legally sufficient for a legally adoptable order.
112	Word	10/26/2021 9:57 PM	10/26/2021 7:35 PM							Galveston - Map 1 Precinct Inventory Final - 10_26_21 docx	thomas bryan	Attorney-Client;Work-Product	Attachment in communication from Galveston County General Counsel to Mr. Drummond re: what Mr. Ready will send to demonstrate what is legally sufficient for a legally adoptable order. Attachment is a Map 1 precinct inventory.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
113	Word	10/26/2021 9:57 PM	10/26/2021 7:26 PM							Galveston - Map 2 Precinct Inventory Final - 10_26_21 docx	thomas bryan	Attorney-Client;Work-Product	Attachment in communication from Galveston County General Counsel to Mr. Drummond re: what Mr. Ready will send to demonstrate what is legally sufficient for a legally adoptable order. Attachment is a Map 2 precinct inventory.
114	Word	10/27/2021 7:03 AM	10/27/2021 7:03 AM							Galveston - Map 1 Precinct Inventory Final - 10_26_21 docx	thomas bryan	Attorney-Client;Work-Product	Attachment between redistricting counsel containing information on voting precincts by Commissioners Court precincts in proposed Map 1
115	Email	10/27/2021 12:27 PM	10/27/2021 12:27 PM	Re: Galveston Precinct Inventory	Order approving Redistricting Plan pdf;Order Establishing Boundaries of Election Precinct Lines in GC effective 01012014.pdf	Dale Oldham <dloesq@aol.com>	Paul Ready <paul@ready.law>	jtorchinsky@holtzmanvogel.com;pgordon@holtzmanvogel.com;Drummond, Tyler <Tyler.Drummond@co.galveston.tx.us>		Re Galveston Precinct Inventory.msg		Attorney-Client;Work-Product	Communica ion from Galveston County General Counsel to redistricting counsel, Mr. Oldham re: precinct inventories for adoptable order and what is legally required for an adoptable order.
116	Pdf	10/27/2021 12:27 PM	3/22/2013 9:28 AM							Order approving Redistricting Plan.pdf		Attorney-Client;Work-Product	Attachment in communication from Galveston County General Counsel to redistricting counsel, Mr. Oldham re: precinct inventories for adoptable order and what is legally required for an adoptable order. Attachment is an exemplar adoptable order from 2012 redistricting.
117	Pdf	10/27/2021 12:27 PM	9/30/2013 12:05 PM							Order Establishing Boundaries of Election Precinct Lines in GC effective 01012014.pdf		Attorney-Client;Work-Product	Attachment in communication from Galveston County General Counsel to redistricting counsel, Mr. Oldham re: precinct inventories for adoptable order and what is legally required for an adoptable order. Attachment is an exemplar adoptable order from 2013 redistricting.
118	Email	10/27/2021 12:27 PM	10/27/2021 12:27 PM	Re: Galveston Precinct Inventory	.htm;Order approving Redistricting Plan pdf;Order Establishing Boundaries of Election Precinct Lines in GC effective 01012014.pdf	Dale Oldham <dloesq@aol.com>	Paul Ready <paul@ready.law>	<jtorchinsky@holtzmanvogel.com>;<pgordon@holtzmanvogel.com>;Drummond, Tyler <Tyler.Drummond@co.galveston.tx.us>		0008487.eml		Attorney-Client;Work-Product	Communica ion from Galveston County General Counsel to redistricting counsel, Mr. Oldham re: precinct inventories for adoptable order and what is legally required for an adoptable order.
119	Pdf	10/27/2021 12:27 PM	9/30/2013 12:05 PM							Order Establishing Boundaries of Election Precinct Lines in GC effective 01012014.pdf		Attorney-Client;Work-Product	Attachment in communication from Galveston County General Counsel to redistricting counsel, Mr. Oldham re: precinct inventories and what is legally required for an adoptable order. Attachment is an exemplar of a legally adoptable order from 2013 redistricting.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
120	Pdf	10/27/2021 12:27 PM	3/22/2013 9:28 AM							Order approving Redistricting Plan.pdf		Attorney-Client;Work-Product	Attachment in communication from Galveston County General Counsel to redistricting counsel, Mr. Oldham re: precinct inventories and what is legally required for an adoptable order. Attachment is an exemplar of a legally adoptable order from 2012 redistricting.
121	Html	10/27/2021 12:27 PM	12/31/9999 6:00 PM							.htm		Attorney-Client;Work-Product	Communica ion from redistricting counsel to Galveston County General Counsel concerning whether the attached documents are legal sufficient for adoptable order for the Commissioners Court.
122	Html	10/27/2021 12:27 PM	12/31/9999 6:00 PM							.htm		Attorney-Client;Work-Product	Blank page attached to privileged communica ion.
123	Email	10/28/2021 11:59 AM	10/28/2021 11:59 AM	RE: Galveston Precinct Inventory	image006.png;image005.png;image004.png	Dale Oldham <dloesq@aol.com>;jtorchinsky@holtzmanvogel.com;pgordon@holtzmanvogel.com	Drummond, Tyler <Tyler.Drummond@co.galveston.tx.us>	Paul Ready <paul@ready.law>		0008503.eml		Attorney-Client;Work-Product	Communica ion from Judge Henry's Chief of Staff to all redistricting counsel, and copying Galveston County General Counsel, asking about timing on final adoptable redistricting plans.
124	Image	10/28/2021 11:59 AM	12/31/9999 6:00 PM							image004.png		Attorney-Client;Work-Product	Galveston County Icon attached to privileged communication.
125	Image	10/28/2021 11:59 AM	12/31/9999 6:00 PM							image006.png		Attorney-Client;Work-Product	Twitter icon attached to privileged communica ion.
126	Image	10/28/2021 11:59 AM	12/31/9999 6:00 PM							image005.png		Attorney-Client;Work-Product	Facebook icon attached to privileged communica ion.
127	Email	10/28/2021 11:59 AM	10/28/2021 11:59 AM	RE: Galveston Precinct Inventory		Dale Oldham <dloesq@aol.com>;jtorchinsky@holtzmanvogel.com;pgordon@holtzmanvogel.com	Drummond, Tyler </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2C5F9C72E05E4D9E8437FD599C045B6E-DRUMMOND, T>	Paul Ready <paul@ready.law>		RE Galveston Precinct Inventory.msg		Attorney-Client;Work-Product	Communica ion from Judge Henry's Chief of Staff to all redistricting counsel, and copying Galveston County General Counsel, asking about timing on final adoptable redistricting plans.
128	Email	10/28/2021 12:30 PM	10/28/2021 12:30 PM	modified invetory	tx.Galv.Map 2 Precinct Inventory Final - 10_26_21.docx;tx.gal.preclist10.27.21.docx	pgordon@holtzmanvogel.com;tom@bryangeodemo.com	dloesq@aol.com;<dloesq@aol.com>			0014960.eml;modified invetory.msg		Attorney-Client;Work-Product	Communica ion from Mr. Oldham, redistricting counsel, to Mr. Gordon, redistricting counsel, and Mr. Bryan, map-drawer, with attachments where Mr. Oldham , as redistricting counsel, provides his edits regarding compliance with traditional redistric ing criteria.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
129	Word	10/28/2021 12:30 PM	10/28/2021 12:16 PM							tx.Galv.Map 2 Precinct Inventory Final - 10_26_21 docx	thomas bryan	Attorney-Client;Work-Product	Communica ion from Mr. Oldham, redistricting counsel, to Mr. Gordon, redistricting counsel, and Mr. Bryan, map-drawer, with attachments where Mr. Oldham , as redistricting counsel, provides his edits regarding compliance with traditional redistric ing criteria; attachment, Map 2 precinct inventory containing Mr. Oldham's edits.
130	Word	10/28/2021 12:30 PM	10/27/2021 11:21 PM							tx.gal.preclist10.27.21.docx	thomas bryan	Attorney-Client;Work-Product	Communica ion from Mr. Oldham, redistricting counsel, to Mr. Gordon, redistricting counsel, and Mr. Bryan, map-drawer, with attachments where Mr. Oldham , as redistricting counsel, provides his edits regarding compliance with traditional redistric ing criteria; attachment, Map 1 precinct inventory containing Mr. Oldham's edits.
131	Email	10/28/2021 12:35 PM	10/28/2021 12:35 PM	FW: Galveston Precinct Inventory	Order approving Redistricting Plan docx;image002.jpg;Order Establishing Boundaries of Election Precinct Lines in GC effective 01012014.docx;image001.jpg	Dale Oldham <dloesq@aol.com>	Phil Gordon <pgordon@HoltzmanVogel.com>			0008505.eml		Attorney-Client;Work-Product	Communica ion from Mr. Gordon, redistricting counsel, to Mr. Oldham, redistricting counsel re: exemplar legally sufficient adoptable orders from the 2012 and 2013 redistricting.
132	Image	10/28/2021 12:35 PM	12/31/9999 6:00 PM							image001.jpg		Attorney-Client;Work-Product	HVBTJ icon attached to privileged communica ion.
133	Word	10/28/2021 12:35 PM	10/28/2021 12:31 PM							Order Establishing Boundaries of Election Precinct Lines in GC effective 01012014.docx	Sharon Norwood	Attorney-Client;Work-Product	Attachment in communication from Mr. Gordon, redistricting counsel, to Mr. Oldham, redistricting counsel re: exemplar legally sufficient adoptable orders from the 2012 and 2013 redistricting. Attachment is a legally adoptable order from the 2013 redistricting.
134	Word	10/28/2021 12:35 PM	10/28/2021 12:32 PM							Order approving Redistricting Plan.docx	Sharon Norwood	Attorney-Client;Work-Product	Attachment in communication from Mr. Gordon, redistricting counsel, to Mr. Oldham, redistricting counsel re: exemplar legally sufficient adoptable orders from the 2012 and 2013 redistricting. Attachment is a legally adoptable order from the 2012 redistricting.
135	Image	10/28/2021 12:35 PM	12/31/9999 6:00 PM							image002.jpg		Attorney-Client;Work-Product	HVBTJ icon attached to privileged communica ion.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
136	Email	10/28/2021 12:39 PM	10/28/2021 12:39 PM	Re: Galveston Precinct Inventory	.jpg	pgordon@HoltzmanVogel.com	<dloesq@aol.com>			0014961.eml		Attorney-Client;Work-Product	Communica ion from Mr. Oldham, redistricting counsel, to Mr. Gordon, redistricting counsel responding to Mr. Gordon's exemplar legally sufficient adoptable orders from the 2012 and 2013 redistricting.
137	Image	10/28/2021 12:39 PM	12/31/9999 6:00 PM							.jpg		Attorney-Client;Work-Product	HVBTJ icon attached to privileged communica ion.
138	Image	10/28/2021 12:39 PM	12/31/9999 6:00 PM							.jpg		Attorney-Client;Work-Product	HVBTJ icon attached to privileged communica ion.
139	Word	10/28/2021 2:00 PM	10/28/2021 2:00 PM							Map1 tx.gal.preclist10.27.21.docx	thomas bryan	Attorney-Client;Work-Product	Document containing legal edits from Mr. Oldham, redistricting counsel, to ensure compliance with traditional redistric ing criteria.
140	Email	10/28/2021 3:59 PM	10/28/2021 3:59 PM	Re: modified invetory	Galveston Map 1 10_28.pdf;Galveston_Analysis 10_28_21.xlsx;Galveston Map 1 Precincts 10_28.pdf;Galveston Map 2 Precincts 10_28.pdf;Galveston Map 2 10_28.pdf	pgordon@holtzmanvogel.com;dloesq@aol.com	tom@bryangeodemo.com			Re modified invetory.msg;0008509.eml		Attorney-Client;Work-Product	Communica ion from map-drawer to Mr. Gordon and Mr. Oldham, redistric ing counsel, describing modifications to precincts so that Mr. Oldham and Mr. Gordon could formulate and provide legal opinions.
141	Pdf	10/28/2021 3:59 PM	12/31/9999 6:00 PM							Galveston Map 1 10_28.pdf		Attorney-Client;Work-Product	Attachment in communication from map-drawer to Mr. Gordon and Mr. Oldham, redistric ing counsel, describing modifications to precincts so that Mr. Oldham and Mr. Gordon could formulate and provide legal opinions. Attachment is a PDF of Map 1.
142	Pdf	10/28/2021 3:59 PM	12/31/9999 6:00 PM							Galveston Map 1 Precincts 10_28 pdf		Attorney-Client;Work-Product	Attachment in communication from map-drawer to Mr. Gordon and Mr. Oldham, redistric ing counsel, describing modifications to precincts so that Mr. Oldham and Mr. Gordon could formulate and provide legal opinions. Attachment is PDF of Map 1 with voting precincts identified.
143	Pdf	10/28/2021 3:59 PM	12/31/9999 6:00 PM							Galveston Map 2 10_28.pdf		Attorney-Client;Work-Product	Attachment in communication from map-drawer to Mr. Gordon and Mr. Oldham, redistric ing counsel, describing modifications to precincts so that Mr. Oldham and Mr. Gordon could formulate and provide legal opinions. Attachment is PDF of Map 2.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
144	Pdf	10/28/2021 3:59 PM	12/31/9999 6:00 PM							Galveston Map 2 Precincts 10_28 pdf		Attorney-Client;Work-Product	Attachment in communication from map-drawer to Mr. Gordon and Mr. Oldham, redistric ing counsel, describing modifications to precincts so that Mr. Oldham and Mr. Gordon could formulate and provide legal opinions. Attachment is a PDF of Map 2 with voting precincts identified.
145	Excel	10/28/2021 3:59 PM	10/28/2021 3:55 PM							Galveston_Analysis 10_28_21 xlsx	thomas bryan	Attorney-Client;Work-Product	Attachment in communication from map-drawer to Mr. Gordon and Mr. Oldham, redistric ing counsel, describing modifications to precincts so that Mr. Oldham and Mr. Gordon could formulate and provide legal opinions. Attachment is an Excel spreadsheet containing data and analysis for Mr. Oldham and Mr. Gordon to formulate their legal opinions.
146	Word	10/28/2021 4:04 PM	10/28/2021 4:04 PM							Map2 tx.gal.preclist10.27.21.docx	thomas bryan	Attorney-Client;Work-Product	Document containing precinct inventory with legal edits from Mr. Oldham concerning compliance with traditional redistricting criteria.
147	Email	11/1/2021 2:05 PM	11/1/2021 2:05 PM	Fwd: Galveston County Redistricting	Letter to Galveston County.pdf;.htm	Dale Oldham <dloesq@aol.com>	Paul Ready <paul@ready.law>	<jtorchinsky@holtzmanvogel.com>;<pgordon@holtzmanvogel.com>		0008562.eml		Attorney-Client;Work-Product	Communica ion from Galveston County General Counsel, to Mr. Oldham, redistricting counsel, Mr. Gordon, redistricting counsel, and Mr. Torchinsky, redistricting counsel, re: letter from League of Women Voters of Texas, seeking redistricting counsel's legal opinion of the letter.
148	Pdf	11/1/2021 2:05 PM	12/31/9999 6:00 PM							Letter to Galveston County pdf		Attorney-Client	Attachment in Communica ion from Galveston County General Counsel, to Mr. Oldham, redistricting counsel, Mr. Gordon, redistricting counsel, and Mr. Torchinsky, redistricting counsel, re: letter from League of Women Voters of Texas, seeking redistricting counsel's legal opinion of the letter; attachment, letter from League of Women Voters of Texas.
149	Html	11/1/2021 2:05 PM	12/31/9999 6:00 PM							.htm		Attorney-Client	Blank page attached to privileged communica ion

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
150	Email	11/1/2021 2:18 PM	11/1/2021 2:18 PM	Fwd: Galveston County Redistricting	Letter to Galveston County.pdf	Dale Oldham <dloesq@aol.com>;Phil Gordon <pgordon@HoltzmanVogel.com>	Jason Torchinsky <jtorchinsky@HoltzmanVogel.com>			0008563.eml		Attorney-Client;Work-Product	Communica ion from Mr. Torchinsky to Mr. Oldham and Mr. Gordon, all redistricting counsel, expressing his legal opinion of the potential implications of the letter from League of Women Voters of Texas.
151	Pdf	11/1/2021 2:18 PM	12/31/9999 6:00 PM							Letter to Galveston County pdf		Attorney-Client;Work-Product	Communica ion from Mr. Torchinsky to Mr. Oldham and Mr. Gordon, all redistricting counsel, expressing his legal opinion of the potential implications of the letter from League of Women Voters of Texas. Attachment is a letter from League of Women Voters of Texas.
152	Email	11/2/2021 3:30 PM	11/2/2021 3:30 PM	RE: MASS EMAIL ADVISORY (County Judges-326) Advisory 2021-14 - Impact of Redistricting on Certain Election Deadlines and Procedures	image001.png	Drummond, Tyler <Tyler.Drummond@co galveston.tx.us>;Dale Oldham <dloesq@aol.com>	Sigler, Nathan <Nathan.Sigler@co.galveston.tx.us>			0008582.eml		Attorney-Client;Work-Product	Communica ion from Mr. Sigler, GIS Engineer for Galveston County to Mr. Oldham, redistricting counsel, and Mr. Drummond, Chief of Staff to County Judge Henry re: status of revisions to Map 2's voting precincts.
153	Image	11/2/2021 3:30 PM	12/31/9999 6:00 PM							image001.png		Attorney-Client;Work-Product	VoteTexas.Gov icon attached to privileged communication.
154	Email	11/2/2021 4:24 PM	11/2/2021 4:24 PM	revised list	Legal Descriptions (Votin Precincts).xlsx	dloesq@aol.com'	Sigler, Nathan </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E97B2BF3B13B48EDBB01CC0F9F39E47D-SIGLER, NAT>			revised list.msg		Attorney-Client;Work-Product	Communica ion from Mr. Sigler, GIS Engineer for Galveston County to Mr. Oldham, redistricting counsel, re: revised legal descriptions for Map 1 and Map 2 voting precincts. Submitted to Mr. Oldham for review and to assist in the provision of legal advice.
155	Excel	11/2/2021 4:24 PM	11/2/2021 4:23 PM							Legal Descriptions (Vo in Precincts).xlsx	Sigler, Nathan	Attorney-Client;Work-Product	Communica ion from Mr. Sigler, GIS Engineer for Galveston County to Mr. Oldham, redistricting counsel, re: revised legal descriptions for Map 1 and Map 2 voting precincts. Submitted to Mr. Oldham for review and to assist in the provision of legal advice; attachment with Map 1 and Map 2 revised legal descriptions for voting precincts.
156	Email	11/3/2021 5:44 PM	11/3/2021 5:44 PM	pct 4	SnipImage.JPG	dloesq@aol.com'	Sigler, Nathan </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E97B2BF3B13B48EDBB01CC0F9F39E47D-SIGLER, NAT>			pct 4.msg		Attorney-Client;Work-Product	Communica ion from Mr. Sigler, GIS Engineer for Galveston County, to Mr. Oldham, redistricting counsel, bringing to Mr. Oldham's attention an issue for his legal analysis and opinion.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
157	Image	11/3/2021 5:44 PM	8/23/2022 3:17 AM							SnipImage.JPG		Attorney-Client;Work-Product	Communica ion from Mr. Sigler, GIS Engineer for Galveston County, to Mr. Oldham, redistricting counsel, bringing to Mr. Oldham's attention an issue for his legal analysis and opinion; attachment Commissioner Precinct 4 boundaries.
158	Email	11/5/2021 10:29 AM	11/5/2021 10:29 AM	Map 2 descriptions	Map 2 (VTD 193) Description.docx;Map 2 (VTD 263 B) Description.docx;Map 2 (VTD 278) Description.docx;Voting Precinct Number Changes (Map 2).docx;Map 2 (VTD 258) Description.docx;Map 2 (VTD 263, A) Description.docx;Map 2 (VTD 490) Description.docx;Map 2 (VTD 263) Description.docx;Map 2 (VTD 336) Description.docx;Map 2 (VTD 169) Description.docx	Drummond, Tyler <Tyler.Drummond@co galveston.tx.us>	Sigler, Nathan <Nathan.Sigler@co.galveston.tx.us>	Paul Ready <paul@ready.law>		Map 2 descriptions.msg		Attorney-Client;Work-Product	Communica ion from Mr. Sigler to Mr. Drummond, with a copy to Mr. Ready, Galveston County General Counsel, submitting attachments showing voting precinct changes, and metes and bounds descriptions for Map 2, submitted for Mr. Ready's legal opinion as to the legal sufficiency for adoptable order.
159	Word	11/5/2021 10:29 AM	11/5/2021 9:23 AM							Map 2 (VTD 193) Description docx	Sigler, Nathan	Attorney-Client;Work-Product	Communica ion from Mr. Sigler to Mr. Drumond, with a copy to Mr. Ready, Galveston County General Counsel, submitting attachments showing voting precinct changes, and metes and bounds descriptions for Map 2, submitted for Mr. Ready's legal opinion as to the legal sufficiency for adoptable order. Attachment is voting precinct boundary description for Voting Precinct 193.
160	Word	11/5/2021 10:29 AM	11/5/2021 9:15 AM							Map 2 (VTD 490) Description docx	Sigler, Nathan	Attorney-Client;Work-Product	Communica ion from Mr. Sigler to Mr. Drumond, with a copy to Mr. Ready, Galveston County General Counsel, submitting attachments showing voting precinct changes, and metes and bounds descriptions for Map 2, submitted for Mr. Ready's legal opinion as to the legal sufficiency for adoptable order; attachment voting precinct boundary description for Voting Precinct 490.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
161	Word	11/5/2021 10:29 AM	11/5/2021 9:21 AM							Map 2 (VTD 263, A) Description docx	Sigler, Nathan	Attorney-Client;Work-Product	Communica ion from Mr. Sigler to Mr. Drumond, with a copy to Mr. Ready, Galveston County General Counsel, submitting attachments showing voting precinct changes, and metes and bounds descriptions for Map 2, submitted for Mr. Ready's legal opinion as to the legal sufficiency for adoptable order; attachment voting precinct boundary description for Voting Precinct 263-A.
162	Word	11/5/2021 10:29 AM	11/5/2021 9:20 AM							Map 2 (VTD 278) Description docx	Sigler, Nathan	Attorney-Client;Work-Product	Communica ion from Mr. Sigler to Mr. Drumond, with a copy to Mr. Ready, Galveston County General Counsel, submitting attachments showing voting precinct changes, and metes and bounds descriptions for Map 2, submitted for Mr. Ready's legal opinion as to the legal sufficiency for adoptable order. Attachment is a voting precinct boundary description for Voting Precinct 278.
163	Word	11/5/2021 10:29 AM	11/5/2021 9:22 AM							Map 2 (VTD 263) Description docx	Sigler, Nathan	Attorney-Client;Work-Product	Communica ion from Mr. Sigler to Mr. Drumond, with a copy to Mr. Ready, Galveston County General Counsel, submitting attachments showing voting precinct changes, and metes and bounds descriptions for Map 2, submitted for Mr. Ready's legal opinion as to the legal sufficiency for adoptable order. Attachment is a voting precinct boundary description for Voting Precinct 263.
164	Word	11/5/2021 10:29 AM	11/5/2021 9:20 AM							Map 2 (VTD 263 B) Description docx	Sigler, Nathan	Attorney-Client;Work-Product	Communica ion from Mr. Sigler to Mr. Drumond, with a copy to Mr. Ready, Galveston County General Counsel, submitting attachments showing voting precinct changes, and metes and bounds descriptions for Map 2, submitted for Mr. Ready's legal opinion as to the legal sufficiency for adoptable order. Attachment is a voting precinct boundary description for Voting Precinct 263-B.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
165	Word	11/5/2021 10:29 AM	11/5/2021 9:15 AM							Map 2 (VTD 258) Description docx	Sigler, Nathan	Attorney-Client;Work-Product	Communica ion from Mr. Sigler to Mr. Drumond, with a copy to Mr. Ready, Galveston County General Counsel, submitting attachments showing voting precinct changes, and metes and bounds descriptions for Map 2, submitted for Mr. Ready's legal opinion as to the legal sufficiency for adoptable order. Attachment is a voting precinct boundary description for Voting Precinct 258.
166	Word	11/5/2021 10:29 AM	11/5/2021 10:10 AM							Voting Precinct Number Changes (Map 2).docx	Sigler, Nathan	Attorney-Client;Work-Product	Communica ion from Mr. Sigler to Mr. Drummond, with a copy to Mr. Ready, Galveston County General Counsel, submitting attachments showing voting precinct changes, and metes and bounds descriptions for Map 2, submitted for Mr. Ready's legal opinion as to the legal sufficiency for adoptable order; attachment voting precinct number changes for Map 2.
167	Word	11/5/2021 10:29 AM	11/5/2021 9:19 AM							Map 2 (VTD 336) Description docx	Sigler, Nathan	Attorney-Client;Work-Product	Communica ion from Mr. Sigler to Mr. Drummond, with a copy to Mr. Ready, Galveston County General Counsel, submitting attachments showing voting precinct changes, and metes and bounds descriptions for Map 2, submitted for Mr. Ready's legal opinion as to the legal sufficiency for adoptable order; attachment voting precinct boundary description for Voting Precinct 336.
168	Word	11/5/2021 10:29 AM	11/5/2021 10:28 AM							Map 2 (VTD 169) Description docx	Sigler, Nathan	Attorney-Client;Work-Product	Communica ion from Mr. Sigler to Mr. Drummond, with a copy to Mr. Ready, Galveston County General Counsel, submitting attachments showing voting precinct changes, and metes and bounds descriptions for Map 2, submitted for Mr. Ready's legal opinion as to the legal sufficiency for adoptable order. Attachment is a voting precinct boundary description for Voting Precinct 169.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
169	Email	11/5/2021 10:29 AM	11/5/2021 10:29 AM	Map 2 descriptions	Map 2 (VTD 490) Description.docx;Map 2 (VTD 263) Description.docx;Map 2 (VTD 278) Description.docx;Map 2 (VTD 263 B) Description.docx;Map 2 (VTD 263, A) Description.docx;Map 2 (VTD 258) Description.docx;Map 2 (VTD 193) Description.docx;Map 2 (VTD 169) Description.docx;Map 2 (VTD 336) Description.docx;Voting Precinct Number Changes (Map 2).docx	Drummond, Tyler <Tyler.Drummond@co galveston.tx.us>	Sigler, Nathan </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=E97B2BF3B13B48EDBB01CC0F9F39E47D-SIGLER, NAT>	Paul@ready.law'			Map 2 descriptions.msg		Attorney-Client;Work-Product	Communica ion from Mr. Sigler to Mr. Drummond, with a copy to Mr. Ready, Galveston County General Counsel, submitting attachments showing voting precinct changes, and metes and bounds descriptions for Map 2, submitted for Mr. Ready's legal opinion as to the legal sufficiency for adoptable order.
170	Word	11/5/2021 10:29 AM	11/5/2021 9:20 AM							Map 2 (VTD 263 B) Description docx	Sigler, Nathan	Attorney-Client;Work-Product	Communica ion from Mr. Sigler to Mr. Drummond, with a copy to Mr. Ready, Galveston County General Counsel, submitting attachments showing voting precinct changes, and metes and bounds descriptions for Map 2, submitted for Mr. Ready's legal opinion as to the legal sufficiency for adoptable order; attachment voting precinct boundary description for Voting Precinct 263-B.
171	Word	11/5/2021 10:29 AM	11/5/2021 10:10 AM							Voting Precinct Number Changes (Map 2).docx	Sigler, Nathan	Attorney-Client;Work-Product	Communica ion from Mr. Sigler to Mr. Drummond, with a copy to Mr. Ready, Galveston County General Counsel, submitting attachments showing voting precinct changes, and metes and bounds descriptions for Map 2, submitted for Mr. Ready's legal opinion as to the legal sufficiency for adoptable order; attachment voting precinct number changes for Map 2.
172	Word	11/5/2021 10:29 AM	11/5/2021 9:21 AM							Map 2 (VTD 263, A) Description docx	Sigler, Nathan	Attorney-Client;Work-Product	Communica ion from Mr. Sigler to Mr. Drummond, with a copy to Mr. Ready, Galveston County General Counsel, submitting attachments showing voting precinct changes, and metes and bounds descriptions for Map 2, submitted for Mr. Ready's legal opinion as to the legal sufficiency for adoptable order; attachment voting precinct boundary description for Voting Precinct 263-A.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
173	Word	11/5/2021 10:29 AM	11/5/2021 9:15 AM							Map 2 (VTD 258) Description docx	Sigler, Nathan	Attorney-Client;Work-Product	Communica ion from Mr. Sigler to Mr. Drummond, with a copy to Mr. Ready, Galveston County General Counsel, submitting attachments showing voting precinct changes, and metes and bounds descriptions for Map 2, submitted for Mr. Ready's legal opinion as to the legal sufficiency for adoptable order; attachment voting precinct boundary description for Voting Precinct 258.
174	Word	11/5/2021 10:29 AM	11/5/2021 9:23 AM							Map 2 (VTD 193) Description docx	Sigler, Nathan	Attorney-Client;Work-Product	Communica ion from Mr. Sigler to Mr. Drummond, with a copy to Mr. Ready, Galveston County General Counsel, submitting attachments showing voting precinct changes, and metes and bounds descriptions for Map 2, submitted for Mr. Ready's legal opinion as to the legal sufficiency for adoptable order; attachment voting precinct boundary description for Voting Precinct 193.
175	Word	11/5/2021 10:29 AM	11/5/2021 9:22 AM							Map 2 (VTD 263) Description docx	Sigler, Nathan	Attorney-Client;Work-Product	Communica ion from Mr. Sigler to Mr. Drummond, with a copy to Mr. Ready, Galveston County General Counsel, submitting attachments showing voting precinct changes, and metes and bounds descriptions for Map 2, submitted for Mr. Ready's legal opinion as to the legal sufficiency for adoptable order; attachment voting precinct boundary description for Voting Precinct 263.
176	Word	11/5/2021 10:29 AM	11/5/2021 9:19 AM							Map 2 (VTD 336) Description docx	Sigler, Nathan	Attorney-Client;Work-Product	Communica ion from Mr. Sigler to Mr. Drummond, with a copy to Mr. Ready, Galveston County General Counsel, submitting attachments showing voting precinct changes, and metes and bounds descriptions for Map 2, submitted for Mr. Ready's legal opinion as to the legal sufficiency for adoptable order; attachment voting precinct boundary description for Voting Precinct 336.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
177	Word	11/5/2021 10:29 AM	11/5/2021 9:15 AM							Map 2 (VTD 490) Description docx	Sigler, Nathan	Attorney-Client;Work-Product	Communica ion from Mr. Sigler to Mr. Drummond, with a copy to Mr. Ready, Galveston County General Counsel, submitting attachments showing voting precinct changes, and metes and bounds descriptions for Map 2, submitted for Mr. Ready's legal opinion as to the legal sufficiency for adoptable order; attachment voting precinct boundary description for Voting Precinct 490.
178	Word	11/5/2021 10:29 AM	11/5/2021 9:20 AM							Map 2 (VTD 278) Description docx	Sigler, Nathan	Attorney-Client;Work-Product	Communica ion from Mr. Sigler to Mr. Drummond, with a copy to Mr. Ready, Galveston County General Counsel, submitting attachments showing voting precinct changes, and metes and bounds descriptions for Map 2, submitted for Mr. Ready's legal opinion as to the legal sufficiency for adoptable order; attachment voting precinct boundary description for Voting Precinct 278.
179	Word	11/5/2021 10:29 AM	11/5/2021 10:28 AM							Map 2 (VTD 169) Description docx	Sigler, Nathan	Attorney-Client;Work-Product	Communica ion from Mr. Sigler to Mr. Drummond, with a copy to Mr. Ready, Galveston County General Counsel, submitting attachments showing voting precinct changes, and metes and bounds descriptions for Map 2, submitted for Mr. Ready's legal opinion as to the legal sufficiency for adoptable order; attachment voting precinct boundary description for Voting Precinct 169.
180	Email	11/5/2021 10:39 AM	11/5/2021 10:39 AM	Re: Map 2 descriptions	Order Establishing Boundaries of Election Precinct Lines in GC effective 01012014.pdf	Sigler, Nathan <Nathan.Sigler@co.galveston.tx.us>	Paul Ready <paul@ready.law>	Drummond, Tyler <Tyler.Drummond@co.galveston.tx.us>		Re Map 2 descriptions.msg		Attorney-Client;Work-Product	Communica ion from Mr. Ready, Galveston County General Counsel, to Mr. Sigler, with a copy to Mr. Drummond, providing legal opinion regarding the legal adequacy of Mr. Sigler's metes and bounds descriptions, and providing an exemplar metes and bounds description from the 2013 redistricting.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
181	Pdf	11/5/2021 10:39 AM	9/30/2013 12:05 PM							Order Establishing Boundaries of Election Precinct Lines in GC effective 01012014.pdf		Attorney-Client;Work-Product	Communica ion from Mr. Ready, Galveston County General Counsel, to Mr. Sigler, with a copy to Mr. Drummond, providing legal opinion regarding the legal adequacy of Mr. Sigler's metes and bounds descriptions, and providing an exemplar metes and bounds description from the 2013 redistricting; attachment: metes and bounds descriptions from the 2013 redistricting.
182	Email	11/5/2021 11:06 AM	11/5/2021 11:06 AM	RE: Map 2 descriptions		Paul Ready <paul@ready.law>	Sigler, Nathan <Nathan.Sigler@co.galveston.tx.us>	Drummond, Tyler <Tyler.Drummond@co.galveston.tx.us>		RE Map 2 descriptions.msg		Attorney-Client;Work-Product	Communica ion from Mr. Sigler to Galveston County General Counsel, with a copy to Mr. Drummond, re: metes and bounds descriptions in light of Mr. Ready's legal advice.
183	Email	11/5/2021 6:08 PM	11/5/2021 6:08 PM	map 2	M&B map 2 258 A.docx;M&B map 2 263.docx;M&B map 336.docx;M&B 490 A.docx;M&B 490.docx;M&B map 2 263 A.docx;Map 2 Commissioner Precinct By Current Voting Precincts & Splits.docx;M&B 336 A.docx;MB map 2 258.docx	Drummond, Tyler <Tyler.Drummond@co galveston.tx.us>;Paul Ready <paul@ready.law>	Sigler, Nathan <Nathan.Sigler@co.galveston.tx.us>	Martinez, Dianna <Dianna.Martinez@co.galveston.tx.us>;Van Horn, Veronica <Veronica.VanHorn@co.galveston.tx.us>		map 2.msg		Attorney-Client;Work-Product	Communica ion from Mr. Sigler to Mr. Drummond and Galveston County General Counsel, wi h a copy to Dianna Martinez, senior policy and constituent advisor to County Judge Mark Henry, and Veronica Van Horn, legal services manager for Galveston County, submitting attachments showing voting precinct changes, and metes and bounds descriptions for Map 2, and voting precinct splits by Map 2, submitted for Mr. Ready's legal opinion as to he legal sufficiency for adoptable order.
184	Word	11/5/2021 6:08 PM	11/5/2021 3:12 PM							M&B map 2 258 A.docx	Sigler, Nathan	Attorney-Client;Work-Product	Communica ion from Mr. Sigler to Mr. Drummond and Galveston County General Counsel, wi h a copy to Dianna Martinez, senior policy and constituent advisor to County Judge Mark Henry, and Veronica Van Horn, legal services manager for Galveston County, submitting attachments showing voting precinct changes, and metes and bounds descriptions for Map 2, and voting precinct splits by Map 2, submitted for Mr. Ready's legal opinion as to he legal sufficiency for adoptable order; attachment, metes and bounds description for voting precinct 258-A.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
185	Word	11/5/2021 6:08 PM	11/5/2021 3:14 PM							M&B 336 A.docx	Sigler, Nathan	Attorney-Client;Work-Product	Communica ion from Mr. Sigler to Mr. Drummond and Galveston County General Counsel, wi h a copy to Dianna Martinez, senior policy and constituent advisor to County Judge Mark Henry, and Veronica Van Horn, legal services manager for Galveston County, submitting attachments showing voting precinct changes, and metes and bounds descriptions for Map 2, and voting precinct splits by Map 2, submitted for Mr. Ready's legal opinion as to he legal sufficiency for adoptable order; attachment, metes and bounds description for voting precinct 336-A.
186	Word	11/5/2021 6:08 PM	11/5/2021 3:15 PM							M&B 490.docx	Sigler, Nathan	Attorney-Client;Work-Product	Communica ion from Mr. Sigler to Mr. Drummond and Galveston County General Counsel, wi h a copy to Dianna Martinez, senior policy and constituent advisor to County Judge Mark Henry, and Veronica Van Horn, legal services manager for Galveston County, submitting attachments showing voting precinct changes, and metes and bounds descriptions for Map 2, and voting precinct splits by Map 2, submitted for Mr. Ready's legal opinion as to he legal sufficiency for adoptable order; attachment, metes and bounds description for voting precinct 490.
187	Word	11/5/2021 6:08 PM	11/5/2021 5:54 PM							Map 2 Commissioner Precinct By Current Voting Precincts & Splits.docx	Sigler, Nathan	Attorney-Client;Work-Product	Communica ion from Mr. Sigler to Mr. Drummond and Galveston County General Counsel, wi h a copy to Dianna Martinez, senior policy and constituent advisor to County Judge Mark Henry, and Veronica Van Horn, legal services manager for Galveston County, submitting attachments showing voting precinct changes, and metes and bounds descriptions for Map 2, and voting precinct splits by Map 2, submitted for Mr. Ready's legal opinion as to he legal sufficiency for adoptable order; attachment, Map 2 Commissioners Precinct By Current Voting Precincts and Splits.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
188	Word	11/5/2021 6:08 PM	11/5/2021 3:14 PM							MB map 2 258.docx	Sigler, Nathan	Attorney-Client;Work-Product	Communica ion from Mr. Sigler to Mr. Drummond and Galveston County General Counsel, wi h a copy to Dianna Martinez, senior policy and constituent advisor to County Judge Mark Henry, and Veronica Van Horn, legal services manager for Galveston County, submitting attachments showing voting precinct changes, and metes and bounds descriptions for Map 2, and voting precinct splits by Map 2, submitted for Mr. Ready's legal opinion as to he legal sufficiency for adoptable order; attachment, metes and bounds description for voting precinct 258.
189	Word	11/5/2021 6:08 PM	11/5/2021 3:13 PM							M&B map 2 263 docx	Sigler, Nathan	Attorney-Client;Work-Product	Communica ion from Mr. Sigler to Mr. Drummond and Galveston County General Counsel, wi h a copy to Dianna Martinez, senior policy and constituent advisor to County Judge Mark Henry, and Veronica Van Horn, legal services manager for Galveston County, submitting attachments showing voting precinct changes, and metes and bounds descriptions for Map 2, and voting precinct splits by Map 2, submitted for Mr. Ready's legal opinion as to he legal sufficiency for adoptable order; attachment, metes and bounds description for voting precinct 263.
190	Word	11/5/2021 6:08 PM	11/5/2021 3:13 PM							M&B map 2 263 A.docx	Sigler, Nathan	Attorney-Client;Work-Product	Communica ion from Mr. Sigler to Mr. Drummond and Galveston County General Counsel, wi h a copy to Dianna Martinez, senior policy and constituent advisor to County Judge Mark Henry, and Veronica Van Horn, legal services manager for Galveston County, submitting attachments showing voting precinct changes, and metes and bounds descriptions for Map 2, and voting precinct splits by Map 2, submitted for Mr. Ready's legal opinion as to he legal sufficiency for adoptable order; attachment, metes and bounds description for voting precinct 263-A.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
191	Word	11/5/2021 6:08 PM	11/5/2021 2:55 PM							M&B map 336.docx	Sigler, Nathan	Attorney-Client;Work-Product	Communica ion from Mr. Sigler to Mr. Drummond and Galveston County General Counsel, wi h a copy to Dianna Martinez, senior policy and constituent advisor to County Judge Mark Henry, and Veronica Van Horn, legal services manager for Galveston County, submitting attachments showing voting precinct changes, and metes and bounds descriptions for Map 2, and voting precinct splits by Map 2, submitted for Mr. Ready's legal opinion as to he legal sufficiency for adoptable order; attachment, metes and bounds description for voting precinct 336.
192	Word	11/5/2021 6:08 PM	11/5/2021 3:14 PM							M&B 490 A.docx	Sigler, Nathan	Attorney-Client;Work-Product	Communica ion from Mr. Sigler to Mr. Drummond and Galveston County General Counsel, wi h a copy to Dianna Martinez, senior policy and constituent advisor to County Judge Mark Henry, and Veronica Van Horn, legal services manager for Galveston County, submitting attachments showing voting precinct changes, and metes and bounds descriptions for Map 2, and voting precinct splits by Map 2, submitted for Mr. Ready's legal opinion as to he legal sufficiency for adoptable order; attachment, metes and bounds description for voting precinct 490-A.
193	Email	11/5/2021 6:09 PM	11/5/2021 6:09 PM	Map 1	M&B map 1 192.docx;M&B map 1 192 A.docx;Map 1 Commissioner Precinct By Current Voting Precincts and Splits.docx;M&B map 1 263 A docx;M&B map 1 144 A.docx;M&B map 1 263.docx;M&B map 1 144.docx	Paul Ready <paul@ready.law>;Drummond, Tyler <Tyler.Drummond@co galveston.tx.us>	Sigler, Nathan <Nathan.Sigler@co.galveston.tx.us>	Martinez, Dianna <Dianna.Martinez@co.galveston.tx.us>;Van Horn, Veronica <Veronica.VanHorn@co.galveston.tx.us>		Map 1 .msg		Attorney-Client;Work-Product	Communica ion from Mr. Sigler to Mr. Drummond and Galveston County General Counsel, wi h a copy to Dianna Martinez, senior policy and constituent advisor to County Judge Mark Henry, and Veronica Van Horn, legal services manager for Galveston County, submitting attachments showing voting precinct changes, and metes and bounds descriptions for Map 1, and voting precinct splits by Map 1, submitted for Mr. Ready's legal opinion as to he legal sufficiency for adoptable order.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
194	Word	11/5/2021 6:09 PM	11/5/2021 4:27 PM							M&B map 1 192 docx	Sigler, Nathan	Attorney-Client;Work-Product	Communica ion from Mr. Sigler to Mr. Drummond and Galveston County General Counsel, wi h a copy to Dianna Martinez, senior policy and constituent advisor to County Judge Mark Henry, and Veronica Van Horn, legal services manager for Galveston County, submitting attachments showing voting precinct changes, and metes and bounds descriptions for Map 1, and voting precinct splits by Map 1, submitted for Mr. Ready's legal opinion as to he legal sufficiency for adoptable order; attachment, metes and bounds description for voting precinct 192.
195	Word	11/5/2021 6:09 PM	11/5/2021 5:49 PM							Map 1 Commissioner Precinct By Current Voting Precincts and Splits.docx	Sigler, Nathan	Attorney-Client;Work-Product	Communica ion from Mr. Sigler to Mr. Drummond and Galveston County General Counsel, wi h a copy to Dianna Martinez, senior policy and constituent advisor to County Judge Mark Henry, and Veronica Van Horn, legal services manager for Galveston County, submitting attachments showing voting precinct changes, and metes and bounds descriptions for Map 1, and voting precinct splits by Map 1, submitted for Mr. Ready's legal opinion as to he legal sufficiency for adoptable order; attachment, document displaying Commissioner Precincts by Current Voting Precincts and Splits.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
196	Word	11/5/2021 6:09 PM	11/5/2021 4:52 PM							M&B map 1 263 A.docx	Sigler, Nathan	Attorney-Client;Work-Product	Communica ion from Mr. Sigler to Mr. Drummond and Galveston County General Counsel, wi h a copy to Dianna Martinez, senior policy and constituent advisor to County Judge Mark Henry, and Veronica Van Horn, legal services manager for Galveston County, submitting attachments showing voting precinct changes, and metes and bounds descriptions for Map 1, and voting precinct splits by Map 1, submitted for Mr. Ready's legal opinion as to he legal sufficiency for adoptable order; attachment, metes and bounds description for voting precinct 263-A.
197	Word	11/5/2021 6:09 PM	11/5/2021 4:25 PM							M&B map 1 144 A.docx	Sigler, Nathan	Attorney-Client;Work-Product	Communica ion from Mr. Sigler to Mr. Drummond and Galveston County General Counsel, wi h a copy to Dianna Martinez, senior policy and constituent advisor to County Judge Mark Henry, and Veronica Van Horn, legal services manager for Galveston County, submitting attachments showing voting precinct changes, and metes and bounds descriptions for Map 1, and voting precinct splits by Map 1, submitted for Mr. Ready's legal opinion as to he legal sufficiency for adoptable order; attachment, metes and bounds description for voting precinct 144-A.
198	Word	11/5/2021 6:09 PM	11/5/2021 4:43 PM							M&B map 1 263 docx	Sigler, Nathan	Attorney-Client;Work-Product	Communica ion from Mr. Sigler to Mr. Drummond and Galveston County General Counsel, wi h a copy to Dianna Martinez, senior policy and constituent advisor to County Judge Mark Henry, and Veronica Van Horn, legal services manager for Galveston County, submitting attachments showing voting precinct changes, and metes and bounds descriptions for Map 1, and voting precinct splits by Map 1, submitted for Mr. Ready's legal opinion as to he legal sufficiency for adoptable order; attachment, metes and bounds description for voting precinct 263.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
199	Word	11/5/2021 6:09 PM	11/5/2021 4:29 PM							M&B map 1 192 A.docx	Sigler, Nathan	Attorney-Client;Work-Product	Communica ion from Mr. Sigler to Mr. Drummond and Galveston County General Counsel, wi h a copy to Dianna Martinez, senior policy and constituent advisor to County Judge Mark Henry, and Veronica Van Horn, legal services manager for Galveston County, submitting attachments showing voting precinct changes, and metes and bounds descriptions for Map 1, and voting precinct splits by Map 1, submitted for Mr. Ready's legal opinion as to he legal sufficiency for adoptable order; attachment, metes and bounds description for voting precinct 192-A.
200	Word	11/5/2021 6:09 PM	11/5/2021 4:26 PM							M&B map 1 144 docx	Sigler, Nathan	Attorney-Client;Work-Product	Communica ion from Mr. Sigler to Mr. Drummond and Galveston County General Counsel, wi h a copy to Dianna Martinez, senior policy and constituent advisor to County Judge Mark Henry, and Veronica Van Horn, legal services manager for Galveston County, submitting attachments showing voting precinct changes, and metes and bounds descriptions for Map 1, and voting precinct splits by Map 1, submitted for Mr. Ready's legal opinion as to he legal sufficiency for adoptable order; attachment, metes and bounds description for voting precinct 144.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
201	Email	11/7/2021 7:56 PM	11/7/2021 7:56 PM	Galveston County Texas Commissioner Redistricting Orders	Galveston Map 2 10_28.pdf;Galveston Map 1 10_28.pdf;Galveston Map 1 Precincts 10_28.pdf;Legal Descriptions Map 1.pdf;Order Establishing Election Precinct Boundaries - Map 1.docx;Galveston Map 2 Precincts 10_28.pdf;Notice of Publication - Map 2 - attach to Order Establishing Boundaries when complete.docx;Order Establishing Elec ion Precinct Boundaries - Map 2.docx;Notice of Publication - Map 1 - attach to Order Establishing Boundaries when complete.docx;Legal Descriptions Map 2.pdf;Order Establishing New Commissioner Precinct Boundaries.docx	Dale Oldham <dloesq@aol.com>;jtorchinsky@holtzmanvogel.com;pgordon@holtzmanvogel.com	Paul Ready <paul@ready.law>	Drummond, Tyler <Tyler.Drummond@co.galveston.tx.us>;Martinez, Dianna <Dianna.Martinez@co.galveston.tx.us>;Van Horn, Veronica <Veronica.VanHorn@co.galveston.tx.us>;Erin Jensen <erin@ready.law>		Galveston County Texas Commissioner Redistricting Orders.msg		Attorney-Client;Work-Product	Communica ion from Galveston County General Counsel advising redistricting counsel, Mr. Oldham, Mr. Torchinsky, and Mr. Gordon re: what is legally required for the Commissioners Court to consider and vote on Map 1 and Map 2.
202	Word	11/7/2021 7:56 PM	11/6/2021 4:46 PM							Order Establishing New Commissioner Precinct Boundaries.docx	Erin Jensen	Attorney-Client;Work-Product	Attachment in email from Galveston County General Counsel to redistricting counsel containing proposed order adopting new Commissioners Court precinct maps providing an example of what is legally required for the Commissioners Court to consider and vote on Map 1 and Map 2.
203	Pdf	11/7/2021 7:56 PM	11/7/2021 7:56 PM							Galveston Map 1 10_28.pdf		Attorney-Client;Work-Product	Attachment in email from Galveston County General Counsel to redistricting counsel containing proposed order adopting new Commissioners Court precinct maps providing an example of what is legally required for the Commissioners Court to consider and vote on Map 2 with a PDF of Map 1 containing the Commissioners Court precinct lines.
204	Word	11/7/2021 7:56 PM	11/7/2021 6:45 PM							Order Establishing Election Precinct Boundaries - Map 1.docx	Erin Jensen	Attorney-Client;Work-Product	Attachment in email from Galveston County General Counsel to redistricting counsel containing proposed order adopting new Commissioners Court precinct maps providing an example of what is legally required for the Commissioners Court to consider and vote on new voting precinct lines.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
205	Word	11/7/2021 7:56 PM	11/7/2021 6:52 PM							Notice of Publication - Map 2 - attach to Order Establishing Boundaries when complete.docx	Erin Jensen	Attorney-Client;Work-Product	Attachment in email from Galveston County General Counsel to redistricting counsel containing proposed order adopting new Commissioners Court precinct maps providing an example of what is legally required for the Commissioners Court to consider and vote new voting precinct lines.
206	Pdf	11/7/2021 7:56 PM	11/7/2021 3:42 PM							Legal Descriptions Map 2.pdf		Attorney-Client;Work-Product	Attachment in email from Galveston County General Counsel to redistricting counsel containing proposed order adopting new Commissioners Court precinct maps providing an example of what is legally required for the Commissioners Court to consider and vote on the metes and bounds descriptions of new voting precincts for Map 2.
207	Word	11/7/2021 7:56 PM	11/7/2021 3:26 PM							Notice of Publication - Map 1 - attach to Order Establishing Boundaries when complete.docx	Erin Jensen	Attorney-Client;Work-Product	Attachment in email from Galveston County General Counsel to redistricting counsel containing proposed order adopting new Commissioners Court precinct maps providing an example of what is legally required for the Commissioners Court to consider and vote on new voting precinct lines.
208	Pdf	11/7/2021 7:56 PM	11/7/2021 7:56 PM							Galveston Map 2 Precincts 10_28.pdf		Attorney-Client;Work-Product	Attachment in email from Galveston County General Counsel to redistricting counsel containing proposed order adopting new Commissioners Court precinct maps providing an example of what is legally required for the Commissioners Court to consider and vote on Map 2 with the voting precinct lines within the Commissioners Court precinct lines.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
209	Pdf	11/7/2021 7:56 PM	11/7/2021 3:34 PM							Legal Descriptions Map 1.pdf		Attorney-Client;Work-Product	Attachment in email from Galveston County General Counsel to redistricting counsel containing proposed order adopting new Commissioners Court precinct maps providing an example of what is legally required for the Commissioners Court to consider and vote on the metes and bounds descriptions of new voting precincts for Map 1.
210	Pdf	11/7/2021 7:56 PM	11/7/2021 7:56 PM							Galveston Map 2 10_28.pdf		Attorney-Client;Work-Product	Attachment in email from Galveston County General Counsel to redistricting counsel containing proposed order adopting new Commissioners Court precinct maps providing an example of what is legally required for the Commissioners Court to consider and vote on Map 2 with a PDF of Map 2 containing the Commissioners Court precinct lines.
211	Pdf	11/7/2021 7:56 PM	11/7/2021 7:56 PM							Galveston Map 1 Precincts 10_28.pdf		Attorney-Client;Work-Product	Attachment in email from Galveston County General Counsel to redistricting counsel containing proposed order adopting new Commissioners Court precinct maps providing an example of what is legally required for the Commissioners Court to consider and vote on Map 1 with the voting precinct lines within the Commissioners Court precinct lines.
212	Word	11/7/2021 7:56 PM	11/7/2021 6:44 PM							Order Establishing Election Precinct Boundaries - Map 2.docx	Erin Jensen	Attorney-Client;Work-Product	Attachment in email from Galveston County General Counsel to redistricting counsel containing proposed order adopting new Commissioners Court precinct maps providing an example of what is legally required for the Commissioners Court to consider and vote on the voting precinct boundaries for Map 2.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
213	Email	11/7/2021 8:00 PM	11/7/2021 8:00 PM	Fwd: Galveston County Texas Commissioner Redistricting Orders	Galveston Map 1 10_28.pdf;Galveston Map 2 Precincts 10_28.pdf;Legal Descriptions Map 1.pdf;Order Establishing Election Precinct Boundaries - Map 2.docx;Notice of Publication - Map 2 - attach to Order Establishing Boundaries when complete.docx;Galveston Map 1 Precincts 10_28.pdf;Order Establishing Elec ion Precinct Boundaries - Map 1.docx;Galveston Map 2 10_28.pdf;Notice of Publication - Map 1 - attach to Order Establishing Boundaries when complete.docx;Legal Descriptions Map 2.pdf;Order Establishing New Commissioner Precinct Boundaries.docx	Dale Oldham <dloesq@aol.com>	Jason Torchinsky <jtorchinsky@HoltzmanVogel.com>	Phil Gordon <pgordon@HoltzmanVogel.com>		0008641.eml		Attorney-Client;Work-Product	Communica ion between redistricting counsel discussing communication from Galveston County General Counsel re: upcoming special session and needed legal advise prior to, and following, special session and generally how to best achieve client's expectations.
214	Pdf	11/7/2021 8:00 PM	12/31/9999 6:00 PM							Galveston Map 2 10_28.pdf		Attorney-Client;Work-Product	Attachment in email between redistric ing counsel containing image of proposed Map 2.
215	Word	11/7/2021 8:00 PM	11/7/2021 3:26 PM							Notice of Publication - Map 1 - attach to Order Establishing Boundaries when complete.docx	Erin Jensen	Attorney-Client;Work-Product	Attachment in email between redistric ing counsel containing proposed notice of new voter precincts by Commissioners Court precinct.
216	Word	11/7/2021 8:00 PM	11/7/2021 6:52 PM							Notice of Publication - Map 2 - attach to Order Establishing Boundaries when complete.docx	Erin Jensen	Attorney-Client;Work-Product	Attachment in email between redistric ing counsel containing proposed notice of new voting precincts by Commissioners Court precincts.
217	Pdf	11/7/2021 8:00 PM	11/7/2021 3:34 PM							Legal Descriptions Map 1.pdf		Attorney-Client;Work-Product	Attachment in email between redistric ing counsel containing metes and bounds description of voting precinct 103.
218	Pdf	11/7/2021 8:00 PM	12/31/9999 6:00 PM							Galveston Map 1 10_28.pdf		Attorney-Client;Work-Product	Attachment in email between redistric ing counsel containing image of proposed Map 1.
219	Word	11/7/2021 8:00 PM	11/7/2021 6:44 PM							Order Establishing Election Precinct Boundaries - Map 2.docx	Erin Jensen	Attorney-Client;Work-Product	Attachment in email between redistric ing counsel containing proposed order adopting new Commissioners Court precincts.
220	Pdf	11/7/2021 8:00 PM	12/31/9999 6:00 PM							Galveston Map 2 Precincts 10_28.pdf		Attorney-Client;Work-Product	Attachment in email between redistric ing counsel containing image of proposed Map 2 with voting precincts overlaid.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
221	Word	11/7/2021 8:00 PM	11/7/2021 6:45 PM							Order Establishing Election Precinct Boundaries - Map 1.docx	Erin Jensen	Attorney-Client;Work-Product	Attachment in email between redistric ing counsel containing proposed order adopting new Commissioners Court precincts.
222	Pdf	11/7/2021 8:00 PM	11/7/2021 3:42 PM							Legal Descriptions Map 2.pdf		Attorney-Client;Work-Product	Attachment in email between redistric ing counsel containing metes and bounds description of voting precinct 103.
223	Pdf	11/7/2021 8:00 PM	12/31/9999 6:00 PM							Galveston Map 1 Precincts 10_28.pdf		Attorney-Client;Work-Product	Attachment in email between redistric ing counsel containing an image of proposed Map 1 with voting precincts overlaid.
224	Word	11/7/2021 8:00 PM	11/6/2021 4:46 PM							Order Establishing New Commissioner Precinct Boundaries.docx	Erin Jensen	Attorney-Client;Work-Product	Attachment in email between redistric ing counsel containing proposed order adopting new Commissioners Court precincts.
225	Email	11/8/2021 10:19 AM	11/8/2021 10:19 AM	Fwd: modified invetory	Galveston Map 2 Precincts 10_28.pdf;Galveston_Analysis 10_28_21.xlsx;Galveston Map 2 10_28.pdf;Galveston Map 1 Precincts 10_28.pdf;Galveston Map 1 10_28.pdf	pgordon@holtzmanvogel.com	<dloesq@aol.com>			0014970.eml		Attorney-Client;Work-Product	Mr. Oldham forwarding to Mr. Gordon, communication from Mr. Byran to Mr. Gordon and Mr. Oldham describing modifications to precincts so that Mr. Oldham and Mr. Gordon could formulate and provide legal opinions.
226	Excel	11/8/2021 10:19 AM	10/28/2021 3:55 PM							Galveston_Analysis 10_28_21 xlsx	thomas bryan	Attorney-Client;Work-Product	Mr. Oldham forwarding to Mr. Gordon, communication from Mr. Byran to Mr. Gordon and Mr. Oldham describing modifications to precincts so that Mr. Oldham and Mr. Gordon could formulate and provide legal opinions; attachment, Excel spreadsheet containing data and analysis for Mr. Oldham and Mr. Gordon to formulate their legal opinions.
227	Pdf	11/8/2021 10:19 AM	12/31/9999 6:00 PM							Galveston Map 1 10_28.pdf		Attorney-Client;Work-Product	Mr. Oldham forwarding to Mr. Gordon, communication from Mr. Byran to Mr. Gordon and Mr. Oldham describing modifications to precincts so that Mr. Oldham and Mr. Gordon could formulate and provide legal opinions; attachment, PDF of Map 1.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
228	Pdf	11/8/2021 10:19 AM	12/31/9999 6:00 PM							Galveston Map 2 Precincts 10_28.pdf		Attorney-Client;Work-Product	Mr. Oldham forwarding to Mr. Gordon, communication from Mr. Byran to Mr. Gordon and Mr. Oldham describing modifications to precincts so that Mr. Oldham and Mr. Gordon could formulate and provide legal opinions; attachment, PDF of Map 2 with voting precinct identified.
229	Pdf	11/8/2021 10:19 AM	12/31/9999 6:00 PM							Galveston Map 2 10_28.pdf		Attorney-Client;Work-Product	Mr. Oldham forwarding to Mr. Gordon, communication from Mr. Byran to Mr. Gordon and Mr. Oldham describing modifications to precincts so that Mr. Oldham and Mr. Gordon could formulate and provide legal opinions; attachment, PDF of Map 2.
230	Pdf	11/8/2021 10:19 AM	12/31/9999 6:00 PM							Galveston Map 1 Precincts 10_28.pdf		Attorney-Client;Work-Product	Mr. Oldham forwarding to Mr. Gordon, communication from Mr. Byran to Mr. Gordon and Mr. Oldham describing modifications to precincts so that Mr. Oldham and Mr. Gordon could formulate and provide legal opinions; attachment, PDF of Map 1 with voting precincts identified.
231	Email	11/8/2021 10:41 AM	11/8/2021 10:41 AM	Re: Galveston County Texas Commissioner Redistricting Orders	11.pdf	Dale Oldham <dloesq@aol.com>;jtorchinsky@holtzmanvogel.com;pgordon@holtzmanvogel.com	Paul Ready <paul@ready.law>	Drummond, Tyler <Tyler.Drummond@co.galveston.tx.us>;Martinez, Dianna <Dianna.Martinez@co.galveston.tx.us>;Van Horn, Veronica <Veronica.VanHorn@co.galveston.tx.us>;Erin Jensen <erin@ready.law>		Re Galveston County Texas Commissioner Redistricting Orders.msg		Attorney-Client;Work-Product	Communica ion between Galveston County General Counsel and redistricting counsel discussing the scope of redistricting representation.
232	Pdf	11/8/2021 10:41 AM	4/5/2021 12:14 PM							11 pdf		Attorney-Client;Work-Product	Attachment to email between Galveston County General Counsel and redistricting counsel discussing scope of engagement, which contains a copy of the engagement letter wi h redistricting counsel.
233	Email	11/8/2021 10:41 AM	11/8/2021 10:41 AM	Re: Galveston County Texas Commissioner Redistricting Orders	11.pdf;.htm	Dale Oldham <dloesq@aol.com>;<jtorchinsky@holtzmanvogel.com>;<pgordon@holtzmanvogel.com>	Paul Ready <paul@ready.law>	Drummond, Tyler <Tyler.Drummond@co.galveston.tx.us>;Martinez, Dianna <Dianna.Martinez@co.galveston.tx.us>;Van Horn, Veronica <veronica.vanhorn@co.galveston.tx.us>;Erin Jensen <erin@ready.law>		0008649.eml		Attorney-Client;Work-Product	Communica ion between Galveston County General Counsel and redistricting counsel discussing the scope of redistricting representation pursuant to the engagement letter with Galveston County.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
234	Pdf	11/8/2021 10:41 AM	4/5/2021 12:14 PM							11 pdf		Attorney-Client;Work-Product	Attachment to email between Galveston County General Counsel and redistricting counsel discussing scope of engagement, which contains a copy of the engagement letter wi h redistricting counsel.
235	Html	11/8/2021 10:41 AM	12/31/9999 6:00 PM							.htm		Attorney-Client;Work-Product	Communica ion from Galveston County General Counsel advising redistricting counsel, Mr. Oldham, Mr. Torchinsky, and Mr. Gordon re: upcoming special session and needed legal advise prior to, and following, special session.
236	Email	11/8/2021 2:35 PM	11/8/2021 2:35 PM	Galveston	Galveston_Map2 10_28_21.shp;Galveston_ Map2 10_28_21.sbn;Galveston_ Map2 10_28_21.sbx;Galveston_ Map1 10_28_21.shp.xml;Galvest on_Map1 10_28_21.sbn;Galveston_ Map2 10_28_21.shp.xml;Galvest on_Map1 10_28_21.sbx;Galveston_ Map1 10_28_21.dbf;Galveston_ Map2 10_28_21.dbf;Galveston_ Map2 10_28_21.shx;Galveston_ Map1 10_28_21.shx;Galveston_ Map1 10_28_21.shp	Jason Torchinsky <jtorchinsky@hvjt.law>	tom@bryangeodemo.com			Galveston.msg		Attorney-Client;Work-Product	Communica ion between Mr. Bryan and redistricting counsel passing along several documents related to Map 1 and 2 proposals for the purpose of obtaining redistricting counsel's legal advice and analysis.
237	Cad	11/8/2021 2:35 PM	10/28/2021 11:32 AM							Galveston_Map2 10_28_21 shp		Attorney-Client;Work-Product	Attachment to email from Mr. Bryan to redistricting counsel containing informa ion related to Map 1 and 2 proposals for the purpose of obtaining legal advice and analysis.
238	Text	11/8/2021 2:35 PM	10/28/2021 10:32 AM							Galveston_Map1 10_28_21 shp.xml		Attorney-Client;Work-Product	Attachment to email from Mr. Bryan to redistricting counsel containing informa ion related to Map 1 and 2 proposals for the purpose of obtaining legal advice and analysis.
239	Cad	11/8/2021 2:35 PM	10/28/2021 11:32 AM							Galveston_Map2 10_28_21 sbn		Attorney-Client;Work-Product	Attachment to email from Mr. Bryan to redistricting counsel containing informa ion related to Map 1 and 2 proposals for the purpose of obtaining legal advice and analysis.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
240	Cad	11/8/2021 2:35 PM	10/28/2021 11:32 AM							Galveston_Map2 10_28_21 sbx		Attorney-Client;Work-Product	Attachment to email from Mr. Bryan to redistricting counsel containing informa ion related to Map 1 and 2 proposals for the purpose of obtaining legal advice and analysis.
241	Cad	11/8/2021 2:35 PM	10/28/2021 10:32 AM							Galveston_Map1 10_28_21 sbx		Attorney-Client;Work-Product	Attachment to email from Mr. Bryan to redistricting counsel containing informa ion related to Map 1 and 2 proposals for the purpose of obtaining legal advice and analysis.
242	Cad	11/8/2021 2:35 PM	10/28/2021 11:32 AM							Galveston_Map2 10_28_21 shx		Attorney-Client;Work-Product	Attachment to email from Mr. Bryan to redistricting counsel containing informa ion related to Map 1 and 2 proposals for the purpose of obtaining legal advice and analysis.
243	Database	11/8/2021 2:35 PM	10/28/2021 10:32 AM							Galveston_Map1 10_28_21 dbf		Attorney-Client;Work-Product	Attachment to email from Mr. Bryan to redistricting counsel containing informa ion related to Map 1 and 2 proposals for the purpose of obtaining legal advice and analysis.
244	Cad	11/8/2021 2:35 PM	10/28/2021 10:32 AM							Galveston_Map1 10_28_21 shx		Attorney-Client;Work-Product	Attachment to email from Mr. Bryan to redistricting counsel containing informa ion related to Map 1 and 2 proposals for the purpose of obtaining legal advice and analysis.
245	Cad	11/8/2021 2:35 PM	10/28/2021 10:32 AM							Galveston_Map1 10_28_21 sbn		Attorney-Client;Work-Product	Attachment to email from Mr. Bryan to redistricting counsel containing informa ion related to Map 1 and 2 proposals for the purpose of obtaining legal advice and analysis.
246	Text	11/8/2021 2:35 PM	10/28/2021 11:32 AM							Galveston_Map2 10_28_21 shp.xml		Attorney-Client;Work-Product	Attachment to email from Mr. Bryan to redistricting counsel containing informa ion related to Map 1 and 2 proposals for the purpose of obtaining legal advice and analysis.
247	Database	11/8/2021 2:35 PM	10/28/2021 11:32 AM							Galveston_Map2 10_28_21 dbf		Attorney-Client;Work-Product	Attachment to email from Mr. Bryan to redistricting counsel containing informa ion related to Map 1 and 2 proposals for the purpose of obtaining legal advice and analysis.
248	Cad	11/8/2021 2:35 PM	10/28/2021 10:32 AM							Galveston_Map1 10_28_21 shp		Attorney-Client;Work-Product	Attachment to email from Mr. Bryan to redistricting counsel containing informa ion related to Map 1 and 2 proposals for the purpose of obtaining legal advice and analysis.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
249	Email	11/8/2021 2:51 PM	11/8/2021 2:51 PM	Galveston Block Assignments	Galveston M1M2 Assignments.xlsx	Jason Torchinsky <jtorchinsky@hvjt.law>	tom@bryangeodemo.com			Galveston Block Assignments.msg		Attorney-Client;Work-Product	Communica ion between Mr. Bryan and redistricting counsel passing along document related to Map 1 and 2 proposals for the purpose of obtaining redistricting counsel's legal advice and analysis.
250	Excel	11/8/2021 2:51 PM	11/8/2021 2:50 PM							Galveston M1M2 Assignments.xlsx	thomas bryan	Attorney-Client;Work-Product	Attachment to email from Mr. Bryan to redistricting counsel containing informa ion related to Map 1 and 2 proposals for the purpose of obtaining legal advice and analysis.
251	Email	11/8/2021 3:09 PM	11/8/2021 3:09 PM	Re: Galveston	Order Establishing Commissioner Precinct (District) Boundaries - Galveston Map 2 - 11_8_21 docx;Galveston Commissioner Precincts (Districts) - Map 2 - 8_11_21 pdf;Order Establishing Commissioner Precinct (District) Boundaries - Galveston Map 1 - 11_8_21 docx;Galveston Commissioner Precincts (Districts) - Map 1 - 8_11_21 pdf;image001.jpg	Jason Torchinsky <jtorchinsky@HoltzmanVogel.com>	Phil Gordon <pgordon@HoltzmanVogel.com>	Dale Oldham <dloesq@aol.com>		0008653.eml		Attorney-Client;Work-Product	Communica ion between Mr. Gordon and other redistricting counsel passing along several documents related to Map 1 and 2 proposals for the purpose of furnishing legal advice and analysis.
252	Pdf	11/8/2021 3:09 PM	12/31/9999 6:00 PM							Galveston Commissioner Precincts (Districts) - Map 1 - 8_11_21.pdf		Attorney-Client;Work-Product	Attachment to email from Mr. Gordon to other redistricting counsel containing information related to Map 1 and 2 proposals for the purpose of furnishing legal advice and analysis.
253	Image	11/8/2021 3:09 PM	12/31/9999 6:00 PM							image001.jpg		Attorney-Client;Work-Product	HVBTJ logo attached to email from Mr. Gordon to other redistricting counsel containing information related to Map 1 and 2 proposals for the purpose of furnishing legal advice and analysis.
254	Word	11/8/2021 3:09 PM	11/8/2021 3:08 PM							Order Establishing Commissioner Precinct (District) Boundaries - Galveston Map 2 - 11_8_21.docx	Jason Torchinsky	Attorney-Client;Work-Product	Attachment in email from Mr. Gordon to other redistricting counsel containing information related to Map 1 and 2 proposals for the purpose of furnishing legal advice and analysis.
255	Word	11/8/2021 3:09 PM	11/8/2021 3:07 PM							Order Establishing Commissioner Precinct (District) Boundaries - Galveston Map 1 - 11_8_21.docx	Jason Torchinsky	Attorney-Client;Work-Product	Attachment in email from Mr. Gordon to other redistricting counsel containing information related to Map 1 and 2 proposals for the purpose of furnishing legal advice and analysis.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
256	Pdf	11/8/2021 3:09 PM	12/31/9999 6:00 PM							Galveston Commissioner Precincts (Districts) - Map 2 - 8_11_21.pdf		Attorney-Client;Work-Product	Attachment in email from Mr. Gordon to other redistricting counsel containing information related to Map 1 and 2 proposals for the purpose of furnishing legal advice and analysis.
257	Email	11/8/2021 3:10 PM	11/8/2021 3:10 PM	Re: Galveston	image001.jpg	Phil Gordon <pgordon@HoltzmanVogel.com>	Jason Torchinsky <jtorchinsky@HoltzmanVogel.com>	Dale Oldham <dloesq@aol.com>		0008654.eml		Attorney-Client;Work-Product	Communica ion between Mr. Torchinsky and other redistricting counsel discussing and approving several documents related to Map 1 and 2 proposals for the purpose of furnishing legal advice and analysis.
258	Image	11/8/2021 3:10 PM	12/31/9999 6:00 PM							image001.jpg		Attorney-Client;Work-Product	Attachment to email between Mr. Torchinsky and other redistricting counsel containing law firm's logo.
259	Email	11/8/2021 3:59 PM	11/8/2021 3:59 PM	Re: Galveston	Galveston_Map1 10_28_21.dbf;Order Establishing Commissioner Precinct (District) Boundaries - Galveston Map 2 - 11_8_21 docx;Galveston_Map1 10_28_21.shp;image001.jpg;Galveston_Map2 10_28_21.shx;Galveston_Map1 10_28_21.sbx;image002.jpg;Galveston_Map2 10_28_21.dbf;Galveston Commissioner Precincts (Districts) - Map 1 - 8_11_21 pdf;Galveston_Map2 10_28_21.sbn;Galveston_Map1 10_28_21.shx;Galveston_Map2 10_28_21.sbx;Galveston_Map1 10_28_21.sbn;Order Establishing Commissioner Precinct (District) Boundaries - Galveston Map 1 - 11_8_21 docx;Galveston Commissioner Precincts	Jason Torchinsky <jtorchinsky@HoltzmanVogel.com>	Phil Gordon <pgordon@HoltzmanVogel.com>	Dale Oldham <dloesq@aol.com>		0008655.eml		Attorney-Client;Work-Product	Communica ion between Mr. Gordon and other redistricting counsel passing along several documents related to Map 1 and 2 proposals for the purpose of furnishing legal advice and analysis.
260	Text	11/8/2021 3:59 PM	10/28/2021 11:32 AM							Galveston_Map2 10_28_21 shp.xml		Attorney-Client;Work-Product	Attachment in email from Mr. Gordon to other redistricting counsel containing information related to Map 1 and 2 proposals for the purpose of furnishing legal advice and analysis.
261	Database	11/8/2021 3:59 PM	10/28/2021 10:32 AM							Galveston_Map1 10_28_21 dbf		Attorney-Client;Work-Product	Attachment in email from Mr. Gordon to other redistricting counsel containing information related to Map 1 and 2 proposals for the purpose of furnishing legal advice and analysis.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
262	Cad	11/8/2021 3:59 PM	10/28/2021 10:32 AM							Galveston_Map1 10_28_21 shp		Attorney-Client;Work-Product	Attachment in email from Mr. Gordon to other redistricting counsel containing information related to Map 1 and 2 proposals for the purpose of furnishing legal advice and analysis.
263	Pdf	11/8/2021 3:59 PM	12/31/9999 6:00 PM							Galveston Commissioner Precincts (Districts) - Map 2 - 8_11_21.pdf		Attorney-Client;Work-Product	Attachment in email from Mr. Gordon to other redistricting counsel containing information related to Map 1 and 2 proposals for the purpose of furnishing legal advice and analysis.
264	Database	11/8/2021 3:59 PM	10/28/2021 11:32 AM							Galveston_Map2 10_28_21 dbf		Attorney-Client;Work-Product	Attachment in email from Mr. Gordon to other redistricting counsel containing information related to Map 1 and 2 proposals for the purpose of furnishing legal advice and analysis.
265	Text	11/8/2021 3:59 PM	10/28/2021 10:32 AM							Galveston_Map1 10_28_21 shp.xml		Attorney-Client;Work-Product	Attachment in email from Mr. Gordon to other redistricting counsel containing information related to Map 1 and 2 proposals for the purpose of furnishing legal advice and analysis.
266	Image	11/8/2021 3:59 PM	12/31/9999 6:00 PM							image002.jpg		Attorney-Client;Work-Product	HVBTJ logo attached to email from Mr. Gordon to other redistricting counsel containing information related to Map 1 and 2 proposals for the purpose of furnishing legal advice and analysis.
267	Cad	11/8/2021 3:59 PM	10/28/2021 10:32 AM							Galveston_Map1 10_28_21 shx		Attorney-Client;Work-Product	Attachment in email from Mr. Gordon to other redistricting counsel containing information related to Map 1 and 2 proposals for the purpose of furnishing legal advice and analysis.
268	Cad	11/8/2021 3:59 PM	10/28/2021 11:32 AM							Galveston_Map2 10_28_21 shx		Attorney-Client;Work-Product	Attachment in email from Mr. Gordon to other redistricting counsel containing information related to Map 1 and 2 proposals for the purpose of furnishing legal advice and analysis.
269	Word	11/8/2021 3:59 PM	11/8/2021 3:07 PM							Order Establishing Commissioner Precinct (District) Boundaries - Galveston Map 1 - 11_8_21.docx	Jason Torchinsky	Attorney-Client;Work-Product	Attachment in email from Mr. Gordon to other redistricting counsel containing information related to Map 1 and 2 proposals for the purpose of furnishing legal advice and analysis.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
270	Image	11/8/2021 3:59 PM	12/31/9999 6:00 PM							image001.jpg		Attorney-Client;Work-Product	HVBTJ logo attached to email from Mr. Gordon to other redistricting counsel containing information related to Map 1 and 2 proposals for the purpose of furnishing legal advice and analysis.
271	Cad	11/8/2021 3:59 PM	10/28/2021 11:32 AM							Galveston_Map2 10_28_21 sbn		Attorney-Client;Work-Product	Attachment in email from Mr. Gordon to other redistricting counsel containing information related to Map 1 and 2 proposals for the purpose of furnishing legal advice and analysis.
272	Word	11/8/2021 3:59 PM	11/8/2021 3:08 PM							Order Establishing Commissioner Precinct (District) Boundaries - Galveston Map 2 - 11_8_21.docx	Jason Torchinsky	Attorney-Client;Work-Product	Attachment in email from Mr. Gordon to other redistricting counsel containing information related to Map 1 and 2 proposals for the purpose of furnishing legal advice and analysis.
273	Cad	11/8/2021 3:59 PM	10/28/2021 10:32 AM							Galveston_Map1 10_28_21 sbx		Attorney-Client;Work-Product	Attachment in email from Mr. Gordon to other redistricting counsel containing information related to Map 1 and 2 proposals for the purpose of furnishing legal advice and analysis.
274	Cad	11/8/2021 3:59 PM	10/28/2021 10:32 AM							Galveston_Map1 10_28_21 sbn		Attorney-Client;Work-Product	Attachment in email from Mr. Gordon to other redistricting counsel containing information related to Map 1 and 2 proposals for the purpose of furnishing legal advice and analysis.
275	Cad	11/8/2021 3:59 PM	10/28/2021 11:32 AM							Galveston_Map2 10_28_21 shp		Attorney-Client;Work-Product	Attachment in email from Mr. Gordon to other redistricting counsel containing information related to Map 1 and 2 proposals for the purpose of furnishing legal advice and analysis.
276	Pdf	11/8/2021 3:59 PM	12/31/9999 6:00 PM							Galveston Commissioner Precincts (Districts) - Map 1 - 8_11_21.pdf		Attorney-Client;Work-Product	Attachment in email from Mr. Gordon to other redistricting counsel containing information related to Map 1 and 2 proposals for the purpose of furnishing legal advice and analysis.
277	Cad	11/8/2021 3:59 PM	10/28/2021 11:32 AM							Galveston_Map2 10_28_21 sbx		Attorney-Client;Work-Product	Attachment in email from Mr. Gordon to other redistricting counsel containing information related to Map 1 and 2 proposals for the purpose of furnishing legal advice and analysis.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
278	Email	11/8/2021 4:37 PM	11/8/2021 4:37 PM	Re: Galveston County Texas Commissioner Redistricting Orders	Galveston_Map2 10_28_21.dbf;Galveston_ Map1 10_28_21.shp;Galveston_ Map2 10_28_21.sbx;Galveston_ Map2 10_28_21.shx;Galveston_ Map2 10_28_21.shp.xml;Order Establishing Commissioner Precinct (District) Boundaries - Galveston Map 1 - 11_8_21 docx;Order Establishing Commissioner Precinct (District) Boundaries - Galveston Map 2 - 11_8_21 docx;Galveston_ Map1 10_28_21.dbf;Galveston_ Map2 10_28_21.shp;Galveston_ Map2 10_28_21.sbn;Galveston Commissioner Precincts (Districts) - Map 1 - 8_11_21 pdf;Galveston Commissioner Precincts (Districts) - Map 2 - 8_11_21 pdf;Galveston_M	Paul Ready <paul@ready.law>;Drummond, Tyler <Tyler.Drummond@co galveston.tx.us>;Martinez, Dianna <Dianna Martinez@co.galveston.tx.us>;Van Horn, Veronica <Veronica.VanHorn@co.galveston.tx.us>;Erin Jensen <erin@ready.law>	Phil Gordon <pgordon@HoltzmanVogel.com>	Dale Oldham <dloesq@aol.com>;Jason Torchinsky <jtorchinsky@HoltzmanVogel.com>		Re Galveston County Texas Commissioner Redistricting Orders.msg		Attorney-Client;Work-Product	
279	Cad	11/8/2021 4:37 PM	10/28/2021 11:32 AM							Galveston_Map2 10_28_21 sbx			Communica ion from Mr. Gordon to Galveston County General Counsel, redistricting counsel, and other Galveston County employees containing legal advice, instructions for adoption of redistricting order, and supporting documents relating to Map 1 and 2 proposals.
280	Text	11/8/2021 4:37 PM	10/28/2021 10:32 AM							Galveston_Map1 10_28_21 shp.xml			Attachment in communication from Mr. Gordon to Galveston County General Counsel and other Galveston County employees containing legal advice and supporting documents relating to Map 1 and 2 proposals.
281	Text	11/8/2021 4:37 PM	10/28/2021 11:32 AM							Galveston_Map2 10_28_21 shp.xml			Attachment in communication from Mr. Gordon to Galveston County General Counsel and other Galveston County employees containing legal advice and supporting documents relating to Map 1 and 2 proposals.
282	Database	11/8/2021 4:37 PM	10/28/2021 10:32 AM							Galveston_Map1 10_28_21 dbf			Attachment in communication from Mr. Gordon to Galveston County General Counsel and other Galveston County employees containing legal advice and supporting documents relating to Map 1 and 2 proposals.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
283	Pdf	11/8/2021 4:37 PM	11/8/2021 4:37 PM							Galveston Commissioner Precincts (Districts) - Map 1 - 8_11_21.pdf		Attorney-Client;Work-Product	Attachment in communication from Mr. Gordon to Galveston County General Counsel and other Galveston County employees containing legal advice and supporting documents relating to Map 1 and 2 proposals.
284	Word	11/8/2021 4:37 PM	11/8/2021 3:07 PM							Order Establishing Commissioner Precinct (District) Boundaries - Galveston Map 1 - 11_8_21.docx	Jason Torchinsky	Attorney-Client;Work-Product	Attachment in communication from Mr. Gordon to Galveston County General Counsel and other Galveston County employees containing legal advice and supporting documents relating to Map 1 and 2 proposals; draft order sent to Galveston County General Counsel for legal review.
285	Pdf	11/8/2021 4:37 PM	11/8/2021 4:37 PM							Galveston Commissioner Precincts (Districts) - Map 2 - 8_11_21.pdf			Attachment in communication from Mr. Gordon to Galveston County General Counsel and other Galveston County employees containing legal advice and supporting documents relating to Map 1 and 2 proposals.
286	Cad	11/8/2021 4:37 PM	10/28/2021 11:32 AM							Galveston_Map2 10_28_21 shx			Attachment in communication from Mr. Gordon to Galveston County General Counsel and other Galveston County employees containing legal advice and supporting documents relating to Map 1 and 2 proposals.
287	Cad	11/8/2021 4:37 PM	10/28/2021 10:32 AM							Galveston_Map1 10_28_21 shp			Attachment in communication from Mr. Gordon to Galveston County General Counsel and other Galveston County employees containing legal advice and supporting documents relating to Map 1 and 2 proposals.
288	Database	11/8/2021 4:37 PM	10/28/2021 11:32 AM							Galveston_Map2 10_28_21 dbf			Attachment in communication from Mr. Gordon to Galveston County General Counsel and other Galveston County employees containing legal advice and supporting documents relating to Map 1 and 2 proposals.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
289	Cad	11/8/2021 4:37 PM	10/28/2021 11:32 AM							Galveston_Map2 10_28_21 shp			Attachment in communication from Mr. Gordon to Galveston County General Counsel and other Galveston County employees containing legal advice and supporting documents relating to Map 1 and 2 proposals.
290	Cad	11/8/2021 4:37 PM	10/28/2021 10:32 AM							Galveston_Map1 10_28_21 sbn			Attachment in communication from Mr. Gordon to Galveston County General Counsel and other Galveston County employees containing legal advice and supporting documents relating to Map 1 and 2 proposals.
291	Word	11/8/2021 4:37 PM	11/8/2021 3:08 PM							Order Establishing Commissioner Precinct (District) Boundaries - Galveston Map 2 - 11_8_21.docx	Jason Torchinsky	Attorney-Client;Work-Product	Attachment in communication from Mr. Gordon to Galveston County General Counsel and other Galveston County employees containing legal advice and supporting documents relating to Map 1 and 2 proposals; attachment, draft order sent to Galveston County General Counsel for legal review.
292	Cad	11/8/2021 4:37 PM	10/28/2021 11:32 AM							Galveston_Map2 10_28_21 sbn			Attachment in communication from Mr. Gordon to Galveston County General Counsel and other Galveston County employees containing legal advice and supporting documents relating to Map 1 and 2 proposals.
293	Cad	11/8/2021 4:37 PM	10/28/2021 10:32 AM							Galveston_Map1 10_28_21 sbx			Attachment in communication from Mr. Gordon to Galveston County General Counsel and other Galveston County employees containing legal advice and supporting documents relating to Map 1 and 2 proposals.
294	Cad	11/8/2021 4:37 PM	10/28/2021 10:32 AM							Galveston_Map1 10_28_21 shx			Attachment in communication from Mr. Gordon to Galveston County General Counsel and other Galveston County employees containing legal advice and supporting documents relating to Map 1 and 2 proposals.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
295	Email	11/8/2021 6:08 PM	11/8/2021 6:08 PM	Re: Galveston County Texas Commissioner Redistricting Orders		Phil Gordon <pgordon@HoltzmanVogel.com>;Martinez, Dianna <Dianna Martinez@co.galveston.tx.us>	Paul Ready <paul@ready.law>	Drummond, Tyler <Tyler.Drummond@co.galveston.tx.us>;Van Horn, Veronica <Veronica.VanHorn@co.galveston.tx.us>;Erin Jensen <erin@ready.law>;Dale Oldham <dloesq@aol.com>;Jason Torchinsky <jtorchinsky@HoltzmanVogel.com>;Van Horn, Veronica <veronica.vanhorn@co.galveston.tx.us>		Re Galveston County Texas Commissioner Redistricting Orders.msg;0008658.eml		Attorney-Client;Work-Product	Communica ion from Galveston County General Counsel to redistricting counsel and Galveston County employees coordinating Map 1 and 2 proposals for the 11/12/21 hearing pursuant to legal advice.
296	Email	11/8/2021 8:50 PM	11/8/2021 8:50 PM	Re: Galveston County Texas Commissioner Redistricting Orders		Paul Ready <paul@ready.law>;Phil Gordon <pgordon@HoltzmanVogel.com>;Martinez, Dianna <Dianna Martinez@co.galveston.tx.us>	Drummond, Tyler <Tyler.Drummond@co.galveston.tx.us>	Van Horn, Veronica <Veronica.VanHorn@co.galveston.tx.us>;Erin Jensen <erin@ready.law>;Dale Oldham <dloesq@aol.com>;Jason Torchinsky <jtorchinsky@HoltzmanVogel.com>		Re Galveston County Texas Commissioner Redistricting Orders.msg;0008659.eml		Attorney-Client;Work-Product	Communica ion from Mr. Drummond to Galveston County General Counsel, redistricting counsel and Galveston County employees coordinating Map 1 and 2 proposals for the 11/12/21 hearing pursuant to legal advice.
297	Email	11/8/2021 8:50 PM	11/8/2021 8:50 PM	Re: Galveston County Texas Commissioner Redistricting Orders		Paul Ready <paul@ready.law>;Phil Gordon <pgordon@HoltzmanVogel.com>;Martinez, Dianna <Dianna Martinez@co.galveston.tx.us>	Drummond, Tyler </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=2c5f9c72e05e4d9e8437fd599c045b6e-Drummond, T>	Van Horn, Veronica <Veronica.VanHorn@co.galveston.tx.us>;Erin Jensen <erin@ready.law>;Dale Oldham <dloesq@aol.com>;Jason Torchinsky <jtorchinsky@HoltzmanVogel.com>		Re Galveston County Texas Commissioner Redistricting Orders.msg		Attorney-Client;Work-Product	Communica ion from Mr. Drummond to Galveston County General Counsel, redistricting counsel and Galveston County employees coordinating Map 1 and 2 proposals for the 11/12/21 hearing pursuant to legal advice.
298	Email	11/8/2021 9:26 PM	11/8/2021 9:26 PM	Re: Galveston County Texas Commissioner Redistricting Orders		Drummond, Tyler <Tyler.Drummond@co.galveston.tx.us>	Paul Ready <paul@ready.law>	Phil Gordon <pgordon@holtzmanvogel.com>;Martinez, Dianna <Dianna.Martinez@co.galveston.tx.us>;Van Horn, Veronica <Veronica.VanHorn@co.galveston.tx.us>;Erin Jensen <erin@ready.law>;Dale Oldham <dloesq@aol.com>;Jason Torchinsky <jtorchinsky@holtzmanvogel.com>		Re Galveston County Texas Commissioner Redistricting Orders.msg;0008660.eml		Attorney-Client;Work-Product	Communica ion from Galveston County General Counsel to Mr. Drummond, redistricting counsel, and other Galveston County employees coordinating Map 1 and 2 proposals for the 11/12/21 hearing pursuant to legal advice.
299	Email	11/9/2021 12:01 AM	11/9/2021 12:01 AM	Re: Galveston County Texas Commissioner Redistricting Orders		Paul Ready <paul@ready.law>	Phil Gordon <pgordon@HoltzmanVogel.com>	Drummond, Tyler <Tyler.Drummond@co.galveston.tx.us>;Martinez, Dianna <Dianna.Martinez@co.galveston.tx.us>;Van Horn, Veronica <Veronica.VanHorn@co.galveston.tx.us>;Erin Jensen <erin@ready.law>;Dale Oldham <dloesq@aol.com>;Jason Torchinsky <jtorchinsky@HoltzmanVogel.com>;Van Horn, Veronica <veronica.vanhorn@co.galveston.tx.us>		0008661.eml;Re Galveston County Texas Commissioner Redistricting Orders.msg		Attorney-Client;Work-Product	Communica ion from Mr. Gordon to Galveston County General Counsel with Mr. Drummond, other redistricting counsel and Galveston County employees copied, coordinating Map 1 and 2 proposals for the 11/12/21 hearing pursuant to legal advice.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
300	Email	11/9/2021 10:46 AM	11/9/2021 10:46 AM	RE: Special Meeting DRAFT	TD DRAFT 11-12-21.pdf;Order Establishing Commissioner Precinct (District) Boundaries - Galvest....docx	Drummond, Tyler <Tyler.Drummond@co galveston.tx.us>	Martinez, Dianna <Dianna.Martinez@co.galveston.tx.us>			RE Special Mee ing DRAFT .msg		Attorney-Client	Communica ion from Ms. Martinez to Mr. Drummond coordinating Map 1 and 2 proposals for the 11/12/21 hearing pursuant to legal advice provided by redistricting counsel. Draft documents prepared by redistricting counsel containing legal advice are attached as exhibits.
301	Word	11/9/2021 10:46 AM	11/8/2021 3:08 PM							Order Establishing Commissioner Precinct (District) Boundaries - Galvest....docx	Jason Torchinsky	Attorney-Client	Attachment to communication from Ms. Martinez to Mr. Drummond coordinating Map 1 and 2 proposals for 11/12/21 hearing pursuant to legal advice provided by redistricting counsel. Attachment was prepared by redistricting counsel containing legal advice.
302	Word	11/9/2021 10:46 AM	11/8/2021 3:07 PM							Order Establishing Commissioner Precinct (District) Boundaries - Galvest....docx	Jason Torchinsky	Attorney-Client	Attachment to communication from Ms. Martinez to Mr. Drummond coordinating Map 1 and 2 proposals for 11/12/21 hearing pursuant to legal advice provided by redistricting counsel. Attachment was prepared by redistricting counsel containing legal advice.
303	Pdf	11/9/2021 10:46 AM	11/9/2021 10:40 AM							TD DRAFT 11-12-21.pdf	LOANER	Attorney-Client	Attachment to communication from Ms. Martinez to Mr. Drummond coordinating Map 1 and 2 proposals for 11/12/21 hearing pursuant to legal advice provided by redistricting counsel. Attachment is a draft meeting agenda.
304	Email	11/9/2021 10:46 AM	11/9/2021 10:46 AM	RE: Special Meeting DRAFT	Order Establishing Commissioner Precinct (District) Boundaries - Galvest....docx;TD DRAFT 11-12-21.pdf	Drummond, Tyler <Tyler.Drummond@co galveston.tx.us>	Martinez, Dianna </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=D18222B5FD744C689C5BF7759AA6838B-MARTINEZ, D>			RE Special Mee ing DRAFT .msg		Attorney-Client	Communica ion from Ms. Garza-Martinez to Mr. Drummond coordinating Map 1 and 2 proposals for the 11/12/21 hearing pursuant to legal advice provided by redistricting counsel. Draft documents prepared by redistricting counsel containing legal advice are attached as exhibits.
305	Word	11/9/2021 10:46 AM	11/8/2021 3:07 PM							Order Establishing Commissioner Precinct (District) Boundaries - Galvest....docx	Jason Torchinsky	Attorney-Client	Attachment to communication from Ms. Garza-Martinez to Mr. Drummond coordinating Map 1 and 2 proposals for 11/12/21 hearing pursuant to legal advice provided by redistricting counsel. Attachment was prepared by redistricting counsel containing legal advice.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
306	Word	11/9/2021 10:46 AM	11/8/2021 3:08 PM							Order Establishing Commissioner Precinct (District) Boundaries - Galvest....docx	Jason Torchinsky	Attorney-Client	Attachment to communication from Ms. Garza-Martinez to Mr. Drummond coordinating Map 1 and 2 proposals for 11/12/21 hearing pursuant to legal advice provided by redistricting counsel. Attachment was prepared by redistricting counsel containing legal advice.
307	Pdf	11/9/2021 10:46 AM	11/9/2021 10:40 AM							TD DRAFT 11-12-21.pdf	LOANER	Attorney-Client	Attachment to communication from Ms. Garza-Martinez to Mr. Drummond coordinating Map 1 and 2 proposals for 11/12/21 hearing pursuant to legal advice provided by redistricting counsel. Attachment is draft meeting agenda.
308	Email	11/9/2021 1:13 PM	11/9/2021 1:13 PM	FW: Galveston County Texas Commissioner Redistricting Orders	Galveston_Map1 10_28_21.shp;Galveston_Map1 10_28_21.sbn;Order Establishing Commissioner Precinct (District) Boundaries - Galveston Map 2 - 11_8_21 docx;Galveston_Map1 10_28_21.shx;Galveston_Map2 10_28_21.shx;Galveston_Map2 10_28_21.sbn;Galveston_Map2 10_28_21.sbx;Order Establishing Commissioner Precinct (District) Boundaries - Galveston Map 1 - 11_8_21 docx;Galveston Commissioner Precincts (Districts) - Map 1 - 8_11_21 pdf;Galveston_Map1 10_28_21.dbf;Galveston_Map2 10_28_21.shp;Galveston Commissioner Precincts (Districts) - Map 2 - 8_11_21 pdf;Galveston_Map1	Liechty, Linda <Linda.Liechty@co galveston.tx.us>;Martinez, Dianna <Dianna Martinez@co.galveston.tx.us>	Drummond, Tyler <Tyler.Drummond@co.galveston.tx.us>			FW Galveston County Texas Commissioner Redistricting Orders.msg		Attorney-Client;Work-Product	Email from Mr. Drummond to Ms. Martinez and Ms. Liechty passing along legal guidance from redistricting counsel and documents related to Map 1 and 2 proposals for 11/12/2021 hearing.
309	Cad	11/9/2021 1:13 PM	10/28/2021 10:32 AM							Galveston_Map1 10_28_21 shx		Attorney-Client;Work-Product	Attachment to email from Mr. Drummond to Ms. Garza-Martinez and Ms. Liechty passing along legal guidance from redistricting counsel and documents related to Map 1 and 2 proposals for 11/12/2021 hearing.
310	Cad	11/9/2021 1:13 PM	10/28/2021 11:32 AM							Galveston_Map2 10_28_21 shx		Attorney-Client;Work-Product	Attachment to email from Mr. Drummond to Ms. Garza-Martinez and Ms. Liechty passing along legal guidance from redistricting counsel and documents related to Map 1 and 2 proposals for 11/12/2021 hearing.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
311	Cad	11/9/2021 1:13 PM	10/28/2021 11:32 AM							Galveston_Map2 10_28_21 shp		Attorney-Client;Work-Product	Attachment to email from Mr. Drummond to Ms. Garza-Martinez and Ms. Liechty passing along legal guidance from redistricting counsel and documents related to Map 1 and 2 proposals for 11/12/2021 hearing.
312	Cad	11/9/2021 1:13 PM	10/28/2021 11:32 AM							Galveston_Map2 10_28_21 sbx		Attorney-Client;Work-Product	Attachment to email from Mr. Drummond to Ms. Garza-Martinez and Ms. Liechty passing along legal guidance from redistricting counsel and documents related to Map 1 and 2 proposals for 11/12/2021 hearing.
313	Pdf	11/9/2021 1:13 PM	11/9/2021 1:13 PM							Galveston Commissioner Precincts (Districts) - Map 1 - 8_11_21.pdf		Attorney-Client;Work-Product	Attachment to email from Mr. Drummond to Ms. Garza-Martinez and Ms. Liechty passing along legal guidance from redistricting counsel and documents related to Map 1 and 2 proposals for 11/12/2021 hearing.
314	Cad	11/9/2021 1:13 PM	10/28/2021 10:32 AM							Galveston_Map1 10_28_21 sbx		Attorney-Client;Work-Product	Attachment to email from Mr. Drummond to Ms. Garza-Martinez and Ms. Liechty passing along legal guidance from redistricting counsel and documents related to Map 1 and 2 proposals for 11/12/2021 hearing.
315	Cad	11/9/2021 1:13 PM	10/28/2021 11:32 AM							Galveston_Map2 10_28_21 sbn		Attorney-Client;Work-Product	Attachment to email from Mr. Drummond to Ms. Garza-Martinez and Ms. Liechty passing along legal guidance from redistricting counsel and documents related to Map 1 and 2 proposals for 11/12/2021 hearing.
316	Word	11/9/2021 1:13 PM	11/8/2021 3:08 PM							Order Establishing Commissioner Precinct (District) Boundaries - Galveston Map 2 - 11_8_21.docx	Jason Torchinsky	Attorney-Client;Work-Product	Attachment to email from Mr. Drummond to Ms. Garza-Martinez and Ms. Liechty passing along legal guidance from redistricting counsel and documents related to Map 1 and 2 proposals for 11/12/2021 hearing; draft order sent to Galveston County General Counsel for legal review.
317	Cad	11/9/2021 1:13 PM	10/28/2021 10:32 AM							Galveston_Map1 10_28_21 sbn		Attorney-Client;Work-Product	Attachment to email from Mr. Drummond to Ms. Garza-Martinez and Ms. Liechty passing along legal guidance from redistricting counsel and documents related to Map 1 and 2 proposals for 11/12/2021 hearing.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
318	Pdf	11/9/2021 1:13 PM	11/9/2021 1:13 PM							Galveston Commissioner Precincts (Districts) - Map 2 - 8_11_21.pdf		Attorney-Client;Work-Product	Attachment to email from Mr. Drummond to Ms. Garza-Martinez and Ms. Liechty passing along legal guidance from redistricting counsel and documents related to Map 1 and 2 proposals for 11/12/2021 hearing.
319	Text	11/9/2021 1:13 PM	10/28/2021 10:32 AM							Galveston_Map1 10_28_21 shp.xml		Attorney-Client;Work-Product	Attachment to email from Mr. Drummond to Ms. Garza-Martinez and Ms. Liechty passing along legal guidance from redistricting counsel and documents related to Map 1 and 2 proposals for 11/12/2021 hearing.
320	Cad	11/9/2021 1:13 PM	10/28/2021 10:32 AM							Galveston_Map1 10_28_21 shp		Attorney-Client;Work-Product	Attachment to email from Mr. Drummond to Ms. Garza-Martinez and Ms. Liechty passing along legal guidance from redistricting counsel and documents related to Map 1 and 2 proposals for 11/12/2021 hearing.
321	Word	11/9/2021 1:13 PM	11/8/2021 3:07 PM							Order Establishing Commissioner Precinct (District) Boundaries - Galveston Map 1 - 11_8_21.docx	Jason Torchinsky	Attorney-Client;Work-Product	Attachment to email from Mr. Drummond to Ms. Garza-Martinez and Ms. Liechty passing along legal guidance from redistricting counsel and documents related to Map 1 and 2 proposals for 11/12/2021 hearing; draft order sent to Galveston County General Counsel for legal review.
322	Database	11/9/2021 1:13 PM	10/28/2021 10:32 AM							Galveston_Map1 10_28_21 dbf		Attorney-Client;Work-Product	Attachment to email from Mr. Drummond to Ms. Garza-Martinez and Ms. Liechty passing along legal guidance from redistricting counsel and documents related to Map 1 and 2 proposals for 11/12/2021 hearing.
323	Database	11/9/2021 1:13 PM	10/28/2021 11:32 AM							Galveston_Map2 10_28_21 dbf		Attorney-Client;Work-Product	Attachment to email from Mr. Drummond to Ms. Garza-Martinez and Ms. Liechty passing along legal guidance from redistricting counsel and documents related to Map 1 and 2 proposals for 11/12/2021 hearing.
324	Text	11/9/2021 1:13 PM	10/28/2021 11:32 AM							Galveston_Map2 10_28_21 shp.xml		Attorney-Client;Work-Product	Attachment to email from Mr. Drummond to Ms. Garza-Martinez and Ms. Liechty passing along legal guidance from redistricting counsel and documents related to Map 1 and 2 proposals for 11/12/2021 hearing.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
325	Email	11/10/2021 11:05 AM	11/10/2021 11:05 AM	Galveston Update	image001.jpg	Jason Torchinsky <jtorchinsky@HoltzmanVogel.com>;Dale Oldham <dloesq@aol.com>	Phil Gordon <pgordon@HoltzmanVogel.com>	Jonathan Lienhard <jlienhard@HoltzmanVogel.com>		0008691.eml		Attorney-Client;Work-Product	Communica ion from Mr. Gordon to other redistricting counsel discussing legal strategy, updates, and questions from Galveston County General Counsel and Mr. Drummond re: 11/12/2021 hearing.
326	Image	11/10/2021 11:05 AM	12/31/9999 6:00 PM							image001.jpg		Attorney-Client;Work-Product	Attachment in email from Mr. Gordon to other redistricting counsel containing law firm logo.
327	Email	11/10/2021 11:09 AM	11/10/2021 11:09 AM	Re: Galveston Update	image001.jpg	Phil Gordon <pgordon@HoltzmanVogel.com>	Jill Holtzman Vogel <jh@HoltzmanVogel.com>	Jason Torchinsky <jtorchinsky@HoltzmanVogel.com>;Dale Oldham <dloesq@aol.com>;Jonathan Lienhard <jlienhard@HoltzmanVogel.com>		0008693.eml		Attorney-Client;Work-Product	Communica ion between redistricting counsel discussing legal strategy, updates, and questions from Mr. Ready and Mr. Drummond re: 11/12/2021 hearing.
328	Image	11/10/2021 11:09 AM	12/31/9999 6:00 PM							image001.jpg		Attorney-Client;Work-Product	Attachment in email from Mr. Gordon to other redistricting counsel containing law firm logo.
329	Email	11/27/2021 7:08 PM	11/27/2021 7:08 PM	Fwd: Galveston County redistricting		Jason Torchinsky <jtorchinsky@holtzmanvogel.com>;Phil Gordon <pgordon@holtzmanvogel.com>;Dale Oldham <dloesq@aol.com>	Paul Ready <paul@ready.law>	Drummond, Tyler <Tyler.Drummond@co.galveston.tx.us>;Henry, Mark <Mark.Henry@co.galveston.tx.us>;Van Horn, Veronica <Veronica.VanHorn@co.galveston.tx.us>		Fwd Galveston County redistricting.msg		Attorney-Client;Work-Product	Communica ion from Galveston County General Counsel to redistricting counsel seeking legal guidance on demands received by the Department of Justice concerning the new Commissioners Court precinct map.
330	Word	11/27/2021 7:08 PM	11/24/2021 11:42 AM							Format guidance.docx	rsb	Attorney-Client;Work-Product	Attachment in communication from Galveston County General Counsel to redistricting counsel seeking legal guidance on demands received by the Department of Justice concerning the new Commissioners Court precinct map.
331	Email	11/28/2021 8:22 PM	11/28/2021 8:22 PM	Fwd: Galveston County redistricting	Format guidance.docx	Mark Henry <mark@talonairservices.com>	Mark.Henry@co.galveston.tx.us			Fwd Galveston County redistricting.msg		Attorney-Client;Work-Product	County Judge Mark Henry forwarding to himself a communication from Galveston County General Counsel to redistricting counsel seeking legal guidance on demands received by the Department of Justice concerning the new Commissioners Court precinct map.
332	Word	11/28/2021 8:22 PM	11/24/2021 11:42 AM							Format guidance.docx	rsb	Attorney-Client;Work-Product	Attachment in communication from Galveston County General Counsel to redistricting counsel seeking legal guidance on demands received by the Department of Justice concerning the new Commissioners Court precinct map.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
333	Email	11/29/2021 6:59 AM	11/29/2021 6:59 AM	FW: Galveston County redistricting		Jason Torchinsky <jtorchinsky@HoltzmanVogel.com>;Dale Oldham <dloesq@aol.com>	Phil Gordon <pgordon@HoltzmanVogel.com>	Jonathan Lienhard <jlienhard@HoltzmanVogel.com>		0008955.eml		Attorney-Client;Work-Product	Communica ion from Mr. Gordon to Mr. Torchinsky and Mr. Oldham, all redistricting counsel, with his legal analysis of the Department of Justice's demands concerning the new Commissioners Court precinct map.
334	Image	11/29/2021 6:59 AM	12/31/9999 6:00 PM							image001.jpg		Attorney-Client;Work-Product	HVJT law firm logo attached to privileged communication.
335	Word	11/29/2021 6:59 AM	11/24/2021 11:42 AM							Format guidance.docx	rsb	Attorney-Client;Work-Product	Attachment in email from Mr. Gordon to other redistricting counsel containing information on demands received by the Department of Justice concerning the new Commissioners Court precinct map.
336	Email	11/29/2021 7:15 AM	11/29/2021 7:15 AM	Re: Galveston County redistricting		Phil Gordon <pgordon@HoltzmanVogel.com>;Dale Oldham <dloesq@aol.com>	Jason Torchinsky <jtorchinsky@HoltzmanVogel.com>	Jonathan Lienhard <jlienhard@HoltzmanVogel.com>		0008959.eml		Attorney-Client;Work-Product	Communica ion from Mr. Torchinsky to Mr. Gordon and Mr. Oldham, all redistricting counsel, re: legal analysis of the Department of Justice's demands concerning the new Commissioners Court precinct map.
337	Image	11/29/2021 7:15 AM	12/31/9999 6:00 PM							image001.jpg		Attorney-Client;Work-Product	HVJT law firm logo attached to privileged communication.
338	Email	11/29/2021 12:52 PM	11/29/2021 12:52 PM	Re: Galveston County redistricting		Paul Ready <paul@ready.law>	Phil Gordon <pgordon@HoltzmanVogel.com>	Drummond, Tyler <Tyler.Drummond@co.galveston.tx.us>;Henry, Mark <Mark.Henry@co.galveston.tx.us>;Van Horn, Veronica <Veronica.VanHorn@co.galveston.tx.us>;Jason Torchinsky <jtorchinsky@HoltzmanVogel.com>;Dale Oldham <dloesq@aol.com>		Re Galveston County redistricting.msg		Attorney-Client;Work-Product	Communica ion from Mr. Gordon to Galveston County General Counsel, with a copy to Mr. Drummond, County Judge Henry, Ms. Van Horn, Mr. Torchinsky and Mr. Oldham, providing Mr. Gordon's legal advice for how to respond to the Department of Justice's demands concerning the new Commissioners Court precinct map.
339	Email	11/30/2021 7:05 PM	11/30/2021 7:05 PM	Fwd: Re: Galveston County redistricting numbers		Paul Ready <paul@ready.law>	Clark, Ken </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=540F7E2AC4074A4FA1478F399AFE6B84-CLARK, KEN>;<Ken.Clark@co.galveston.tx.us>			Fwd Re Galveston County redistricting numbers.msg		Attorney-Client;Work-Product	Commissioner Clark's communication wi h Mr. Ready, Galveston County General Counsel, requesting legal assistance in responding to question.
340	Email	11/30/2021 7:25 PM	11/30/2021 7:25 PM	Re: Galveston County redistricting numbers		Clark, Ken <Ken.Clark@co galveston.tx.us>	Paul Ready <paul@ready.law>			Re Galveston County redistricting numbers.msg		Attorney-Client;Work-Product	Communica ion from Mr. Ready, Galveston County General Counsel, to Commissioner Clark responding to Commissioner Clark's question by providing legal strategy and analysis.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
341	Email	12/7/2021 1:17 PM	12/7/2021 1:17 PM	Fwd: Records Preserva ion Notice		Drummond, Tyler <Tyler.Drummond@co galveston.tx.us>;Paul Ready <paul@ready.law>	Mark.Henry@co.galveston .tx.us			Fwd Records Preservation Notice msg		Attorney-Client;Work-Product	Email from County Judge Henry to Mr. Drummond, chief of staff, and Galveston County General Counsel re: preserva ion notice from Texas Civil Rights Project, seeking opinion regarding legal obligations imposed by letter.
342	Pdf	12/7/2021 1:17 PM	12/7/2021 12:32 PM							Preserva ion Letter Galveston County Redistricting 12-7-21.pdf	Chris	Attorney-Client;Work-Product	Attachment to email from County Judge Henry to Mr. Drummond, chief of staff, and Galveston County General Counsel re: preservation notice from Texas Civil Rights Project, seeking opinion regarding legal obligations imposed by letter; attachment: preservation letter from Texas Civil Rights Project.
343	Email	12/7/2021 1:17 PM	12/7/2021 1:17 PM	Fwd: Records Preserva ion Notice		Drummond, Tyler <Tyler.Drummond@co galveston.tx.us>;Paul Ready <paul@ready.law>	Henry, Mark </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B0B75B0806394269A16AC189BEAD91EA-HENRY, MARK>			Fwd Records Preservation Notice msg		Attorney-Client;Work-Product	Email from County Judge Henry to Mr. Drummond, chief of staff, and Galveston County General Counsel re: preserva ion notice from Texas Civil Rights Project, seeking opinion regarding legal obligations imposed by letter.
344	Pdf	12/7/2021 1:17 PM	12/7/2021 12:32 PM							Preserva ion Letter Galveston County Redistricting 12-7-21.pdf	Chris	Attorney-Client;Work-Product	Attachment to email from County Judge Henry to Mr. Drummond, chief of staff, and Galveston County General Counsel re: preservation notice from Texas Civil Rights Project, seeking opinion regarding legal obligations imposed by letter; attachment: preservation letter from Texas Civil Rights Project.
345	Email	12/7/2021 1:27 PM	12/7/2021 1:27 PM	FW: Records Preservation Notice		Phil Gordon <pgordon@HoltzmanVogel.com>	Drummond, Tyler </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2C5F9C72E05E4D9E8437FD599C045B6E-DRUMMOND, T>			FW Records Preservation Notice msg		Attorney-Client;Work-Product	Email from Mr. Drummond, chief of staff to County Judge Henry to Mr. Gordon, redistricting counsel, forwarding Texas Civil Rights Project's preservation letter, seeking legal advice regarding legal obligations imposed by letter.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
346	Pdf	12/7/2021 1:27 PM	12/7/2021 12:32 PM							Preserva ion Letter Galveston County Redistricting 12-7-21.pdf	Chris	Attorney-Client;Work-Product	Attachment to email from Mr. Drummond, chief of staff to County Judge Henry to Mr. Gordon, redistricting counsel, forwarding Texas Civil Rights Project's preservation letter, seeking legal advice regarding legal obligations imposed by letter; attachment, preservation letter from Texas Civil Rights Project.
347	Email	12/7/2021 1:29 PM	12/7/2021 1:29 PM	FW: Records Preservation Notice	Preservation Letter Galveston County Redistricting 12-7-21.pdf;image002.png;image003.png;image001.jpg;image004.png	Jason Torchinsky <jtorchinsky@HoltzmanVogel.com>	Phil Gordon <pgordon@HoltzmanVogel.com>	Dale Oldham <dloesq@aol.com>		0009127.eml		Attorney-Client;Work-Product	Communica ion between redistricting counsel re: document preservation notice from Texas Civil Rights Project to formulate response concerning legal obligations.
348	Image	12/7/2021 1:29 PM	12/31/9999 6:00 PM							image002.png		Attorney-Client;Work-Product	Galveston County icon attached to privileged communication.
349	Pdf	12/7/2021 1:29 PM	12/7/2021 12:32 PM							Preserva ion Letter Galveston County Redistricting 12-7-21.pdf	Chris	Attorney-Client;Work-Product	Attachment to communication between redistricting counsel re: document preservation notice from Texas Civil Rights Project to formulate response concerning legal obligations; attachment, letter from Texas Civil Rights Project.
350	Image	12/7/2021 1:29 PM	12/31/9999 6:00 PM							image004.png		Attorney-Client;Work-Product	Twitter icon attached to privileged communica ion.
351	Image	12/7/2021 1:29 PM	12/31/9999 6:00 PM							image001.jpg		Attorney-Client;Work-Product	HVBTJ icon attached to privileged communica ion.
352	Image	12/7/2021 1:29 PM	12/31/9999 6:00 PM							image003.png		Attorney-Client;Work-Product	Facebook icon attached to privileged communica ion.
353	Email	12/7/2021 1:58 PM	12/7/2021 1:58 PM	Fwd: Records Preserva ion Notice	Preservation Letter Galveston County Redistricting 12-7-21.pdf	Jason Torchinsky <jtorchinsky@holtzmanvogel.com>;pgordon@holtzmanvogel.com;Dale Oldham <dloesq@aol.com>;Van Horn, Veronica <Veronica.VanHorn@co.galveston.tx.us>;Drummond, Tyler <Tyler.Drummond@co galveston.tx.us>	Paul Ready <paul@ready.law>			Fwd Records Preservation Notice msg	Attorney-Client;Work-Product	Correspondence from Galveston County General Counsel to redistricting counsel, Ms. Van Horn, legal services manager for Galveston County, and Mr. Drummond, Chief of Staff to County Judge Henry, asking for legal advice concerning legal obligations imposed by preservation letter from Texas Civil Rights Project.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
354	Pdf	12/7/2021 1:58 PM	12/7/2021 12:32 PM							Preserva ion Letter Galveston County Redistricting 12-7-21.pdf	Chris	Attorney-Client;Work-Product	Attachment to correspondence from Galveston County General Counsel, to redistric ing counsel, Ms. Van Horn, legal services manager for Galveston County, and Mr. Drummond, Chief of Staff to County Judge Henry, asking for legal advice concerning legal obligations imposed by preservation letter from Texas Civil Rights Project; attachment: preservation letter from Texas Civil Rights Project.
355	Email	12/7/2021 2:03 PM	12/7/2021 2:03 PM	FW: Records Preservation Notice	image001.jpg;Preservation Letter Galveston County Redistricting 12-7-21.pdf	Jason Torchinsky <jtorchinsky@HoltzmanVogel.com>	Phil Gordon <pgordon@HoltzmanVogel.com>	Dale Oldham <dloesq@aol.com>;Jonathan Lienhard <jlienhard@HoltzmanVogel.com>		0009130.eml		Attorney-Client;Work-Product	Communica ion from Mr. Gordon, redistricting counsel, to other redistricting counsel, offering his legal opinion and legal strategy in response to preservation letter from Texas Civil Rights Project.
356	Image	12/7/2021 2:03 PM	12/31/9999 6:00 PM							image001.jpg		Attorney-Client;Work-Product	HVBTJ icon attached to privileged communica ion.
357	Pdf	12/7/2021 2:03 PM	12/7/2021 12:32 PM							Preserva ion Letter Galveston County Redistricting 12-7-21.pdf	Chris	Attorney-Client;Work-Product	Attachment to communication from Mr. Gordon, redistricting counsel, to other redistricting counsel, offering his legal opinion and legal strategy in response to preservation letter from Texas Civil Rights Project; attachment: Texas Civil Rights Project preservation letter.
358	Email	12/7/2021 2:04 PM	12/7/2021 2:04 PM	Re: Records Preservation Notice	image001[35].jpg	Phil Gordon <pgordon@HoltzmanVogel.com>	Jason Torchinsky <jtorchinsky@HoltzmanVogel.com>	Dale Oldham <dloesq@aol.com>;Jonathan Lienhard <jlienhard@HoltzmanVogel.com>		0009131.eml		Attorney-Client;Work-Product	Communica ion from Mr. Torchinsky, redistricting counsel, to other redistricting counsel, responding to Mr. Gordon's legal opinion and legal strategy in response to preservation letter from Texas Civil Rights Project.
359	Image	12/7/2021 2:04 PM	12/31/9999 6:00 PM							image001[35].jpg		Attorney-Client;Work-Product	HVBTJ icon attached to privileged communica ion.
360	Email	12/7/2021 2:45 PM	12/7/2021 2:45 PM	Re: Records Preservation Notice	image001[35].jpg	Jason Torchinsky <jtorchinsky@HoltzmanVogel.com>	Phil Gordon <pgordon@HoltzmanVogel.com>	Dale Oldham <dloesq@aol.com>;Jonathan Lienhard <jlienhard@HoltzmanVogel.com>		0009133.eml		Attorney-Client;Work-Product	Communica ion from Mr. Gordon, redistricting counsel, to other redistricting counsel, offering his legal opinion and legal strategy regarding possible legal obligations under preservation letter from Texas Civil Rights Project.
361	Image	12/7/2021 2:45 PM	12/31/9999 6:00 PM							image001[35].jpg		Attorney-Client;Work-Product	HVBTJ icon attached to privileged communica ion.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
362	Email	12/7/2021 2:50 PM	12/7/2021 2:50 PM	Re: Records Preservation Notice		Phil Gordon <pgordon@HoltzmanVogel.com>	Jason Torchinsky <jtorchinsky@HoltzmanVogel.com>	Dale Oldham <dloesq@aol.com>;Jonathan Lienhard <jlienhard@HoltzmanVogel.com>		0009134.eml		Attorney-Client;Work-Product	Communica ion from Mr. Torchinsky, redistricting counsel, to other redistricting counsel, responding to Mr. Gordon's legal opinion and legal strategy re: possible legal obligations under preservation letter from Texas Civil Rights Project.
363	Email	12/7/2021 2:58 PM	12/7/2021 2:58 PM	Re: Records Preservation Notice		Jason Torchinsky <jtorchinsky@HoltzmanVogel.com>	Phil Gordon <pgordon@HoltzmanVogel.com>	Dale Oldham <dloesq@aol.com>;Jonathan Lienhard <jlienhard@HoltzmanVogel.com>		0009135.eml		Attorney-Client;Work-Product	Communica ion from Mr. Gordon, redistricting counsel, to other redistricting counsel, coordinating communicating to client its possible legal obligations under preservation letter from Texas Civil Rights Project.
364	Email	12/7/2021 3:00 PM	12/7/2021 3:00 PM	Re: Records Preservation Notice		Phil Gordon <pgordon@HoltzmanVogel.com>	Jason Torchinsky <jtorchinsky@HoltzmanVogel.com>	Dale Oldham <dloesq@aol.com>;Jonathan Lienhard <jlienhard@HoltzmanVogel.com>		0009136.eml		Attorney-Client;Work-Product	Communica ion from Mr. Torchinsky, redistricting counsel, to other redistricting counsel, coordinating communicating to client its possible legal obligations under preservation letter from Texas Civil Rights Project.
365	Email	12/7/2021 3:03 PM	12/7/2021 3:03 PM	Re: Records Preservation Notice		Jason Torchinsky <jtorchinsky@HoltzmanVogel.com>	Phil Gordon <pgordon@HoltzmanVogel.com>	Dale Oldham <dloesq@aol.com>;Jonathan Lienhard <jlienhard@HoltzmanVogel.com>		0009137.eml		Attorney-Client;Work-Product	Communica ion from Mr. Gordon, redistricting counsel, to other redistricting counsel, offering his legal opinion and legal strategy regarding possible legal obligations under preservation letter from Texas Civil Rights Project.
366	Email	12/7/2021 4:22 PM	12/7/2021 4:22 PM	Re: Records Preservation Notice		Paul Ready <paul@ready.law>;Phil Gordon <pgordon@HoltzmanVogel.com>;Dale Oldham <dloesq@aol.com>;Van Horn, Veronica <Veronica.VanHorn@co.galveston.tx.us>;Drummond, Tyler <Tyler.Drummond@co galveston.tx.us>;Veronica Van Horn <Veronica.VanHorn@co.galveston.tx.us>;Tyler Drummond <Tyler.Drummond@co galveston.tx.us>	Jason Torchinsky <jtorchinsky@HoltzmanVogel.com>			0009140.eml;Re Records Preserva ion No ice.msg		Attorney-Client;Work-Product	Communica ion from Mr. Torchinsky, redistricting counsel to Galveston County General Counsel, Ms. Van Horn, manager of legal services for Galveston County, and Mr. Drummond, chief of staff to County Judge Henry providing legal advice concerning legal obligations imposed by preservation letter from Texas Civil Rights Project.
367	Email	12/7/2021 4:31 PM	12/7/2021 4:31 PM	RE: Records Preservation Notice	image006.png;image005.png;image004.png	Jason Torchinsky <jtorchinsky@HoltzmanVogel.com>;Paul Ready <paul@ready.law>;Phil Gordon <pgordon@HoltzmanVogel.com>;Dale Oldham <dloesq@aol.com>;Van Horn, Veronica <Veronica.VanHorn@co.galveston.tx.us>	Drummond, Tyler <Tyler.Drummond@co.galveston.tx.us>			0009141.eml		Attorney-Client;Work-Product	Communica ion from Mr. Drummond to Mr. Torchinsky responding to Mr. Torchinsky's legal advice concerning the legal obligations imposed by the preservation letter from Texas Civil Rights Project.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
368	Image	12/7/2021 4:31 PM	12/31/9999 6:00 PM							image004.png		Attorney-Client;Work-Product	Icon of Galveston County attached to privileged communication.
369	Image	12/7/2021 4:31 PM	12/31/9999 6:00 PM							image005.png		Attorney-Client;Work-Product	Facebook icon attached to privilleged communication.
370	Image	12/7/2021 4:31 PM	12/31/9999 6:00 PM							image006.png		Attorney-Client;Work-Product	Twitter icon attached to privileged communica ion.
371	Email	12/7/2021 4:31 PM	12/7/2021 4:31 PM	RE: Records Preservation Notice		Jason Torchinsky <jtorchinsky@HoltzmanVogel.com>;Paul Ready <paul@ready.law>;Phil Gordon <pgordon@HoltzmanVogel.com>;Dale Oldham <dloesq@aol.com>;Van Horn, Veronica <Veronica.VanHorn@co.galveston.tx.us>	Drummond, Tyler </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=2C5F9C72E05E4D9E8437FD599C045B6E-DRUMMOND, T>			RE Records Preservation Notice msg		Attorney-Client;Work-Product	Communica ion from Mr. Drummond to Mr. Torchinsky responding to Mr. Torchinsky's legal advice concerning the legal obligations imposed by the preservation letter from Texas Civil Rights Project.
372	Email	12/9/2021 11:57 AM	12/9/2021 11:57 AM	Fwd: Records Preserva ion Notice	.htm;Preservation Letter Galveston County Redistricting 12-7-21.pdf	Jason Torchinsky <jtorchinsky@holtzmanvogel.com>;Phil Gordon <pgordon@holtzmanvogel.com>;Dale Oldham <dloesq@aol.com>	Paul Ready <paul@ready.law>	Van Horn, Veronica <veronica.vanhorn@co.galveston.tx.us>		0009190.eml		Attorney-Client;Work-Product	Communica ion from Galveston County General Counsel to redistricting counsel re: communicating the legal obligations of preservation notice.
373	Html	12/9/2021 11:57 AM	12/31/9999 6:00 PM							.htm		Attorney-Client;Work-Product	Blank page attached to privileged communica ion.
374	Pdf	12/9/2021 11:57 AM	12/7/2021 12:32 PM							Preserva ion Letter Galveston County Redistricting 12-7-21.pdf	Chris	Attorney-Client;Work-Product	Attachment to communication from Galveston County General Counsel to redistricting counsel re: communicating the legal obligations of preservation notice; attachment: preservation letter from Texas Civil Rights Project.
375	Email	12/9/2021 12:44 PM	12/9/2021 12:44 PM	Fwd: Records Preserva ion Notice	Preservation Letter Galveston County Redistricting 12-7-21.pdf	Henry, Mark <Mark.Henry@co.galveston.tx.us>;Apffel, Darrell <Darrell.Apffel@co.galveston.tx.us>;Giusti, Joseph <Joseph.Giusti@co.galveston.tx.us>;Holmes, Stephen <Stephen.Holmes@co.galveston.tx.us>;Clark, Ken <Ken.Clark@co galveston.tx.us>	Paul Ready <paul@ready.law>	Van Horn, Veronica <Veronica.VanHorn@co.galveston.tx.us>;Liechty, Linda <Linda.Liechty@co.galveston.tx.us>;Drummond, Tyler <Tyler.Drummond@co.galveston.tx.us>;Sigler, Nathan <Nathan.Sigler@co.galveston.tx.us>;Webb, Jed <Jed.Webb@galvestoncountytx.gov>;Jason Torchinsky <jtorchinsky@holtzmanvogel.com>;Phil Gordon <pgordon@holtzmanvogel.com>;Dale Oldham <dloesq@aol.com>;Martinez, Dianna <Dianna.Martinez@co.galveston.tx.us>;Davidson, Zach <Zach.davidson@co.galveston.tx.us>		Fwd Records Preservation Notice msg		Attorney-Client;Work-Product	Communica ion from Galveston County General Counsel to members of the Commissioners Court, redistricting counsel, and other Galveston County officials and employees re: legal obligation to preserve documents due to preservation notice.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
376	Pdf	12/9/2021 12:44 PM	12/7/2021 12:32 PM							Preserva ion Letter Galveston County Redistricting 12-7-21.pdf	Chris	Attorney-Client;Work-Product	Attachment to communication from Galveston County General Counsel to members of the Commissioners Court, redistricting counsel, and other Galveston County officials and employees re: legal obligation to preserve documents due to preservation notice; attachment: preservation letter from the Texas Civil Rights Project.
377	Email	12/9/2021 12:44 PM	12/9/2021 12:44 PM	Fwd: Records Preserva ion Notice	Preservation Letter Galveston County Redistricting 12-7-21.pdf;.htm	Henry, Mark <Mark.Henry@co.galveston.tx.us>;Apffel, Darrell <Darrell.Apffel@co.galveston.tx.us>;Giusti, Joseph <Joseph.Giusti@co.galveston.tx.us>;Holmes, Stephen <Stephen.Holmes@co.galveston.tx.us>;Ken Clark <ken.clark@co.galveston.tx.us>	Paul Ready <paul@ready.law>	Van Horn, Veronica <veronica.vanhorn@co.galveston.tx.us>;Linda Liechty <Linda.Liechty@co.galveston.tx.us>;Tyler Drummond <Tyler.Drummond@co.galveston.tx.us>;Sigler, Nathan <Nathan.Sigler@co.galveston.tx.us>;Jed Webb <Jed.Webb@Galvestoncountytx.gov>;Jason Torchinsky <jtorchinsky@holtzmanvogel.com>;Phil Gordon <pgordon@holtzmanvogel.com>;Dale Oldham <dloesq@aol.com>;Martinez, Dianna <Dianna.Martinez@co.galveston.tx.us>;Davidson, Zach <zach.davidson@co.galveston.tx.us>		0009191.eml		Attorney-Client;Work-Product	Communica ion from Galveston County General Counsel to members of the Commissioners Court, redistricting counsel, and other Galveston County officials and employees re: legal obligation to preserve documents due to preservation notice.
378	Html	12/9/2021 12:44 PM	12/31/9999 6:00 PM							.htm		Attorney-Client;Work-Product	Blank page attached to privileged communica ion.
379	Pdf	12/9/2021 12:44 PM	12/7/2021 12:32 PM							Preserva ion Letter Galveston County Redistricting 12-7-21.pdf	Chris	Attorney-Client;Work-Product	Attachment to communication from Galveston County General Counsel to members of the Commissioners Court, redistricting counsel, and other Galveston County officials and employees re: legal obligation to preserve documents due to preservation notice; attachment: preservation letter from the Texas Civil Rights Project.
380	Email	12/9/2021 2:56 PM	12/9/2021 2:56 PM	Preserva ion Letter Galveston County Redistricting 12-7-21[44].pdf	Preservation Letter Galveston County Redistricting 12-7-21[44].pdf	tom@bryangeodemo.com	Jason Torchinsky <jtorchinsky@HoltzmanVogel.com>	Phil Gordon <pgordon@HoltzmanVogel.com>		Preserva ion Letter Galveston County Redistricting 12-7-21[44].pdf msg		Attorney-Client;Work-Product	Communica ion from Mr. Torchinsky, redistricting counsel, to Mr. Bryan, map-drawer and technical expert, communicating legal obligations imposed upon Mr. Bryan by preservation letter from Texas Civil Rights Project.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
381	Pdf	12/9/2021 2:56 PM	12/7/2021 12:32 PM							Preserva ion Letter Galveston County Redistricting 12-7-21[44].pdf	Chris	Attorney-Client;Work-Product	Attachment to communication from Mr. Torchinsky, redistricting counsel, to Mr. Bryan, map-drawer and technical expert, communicating legal obligations imposed upon Mr. Bryan by preservation letter from Texas Civil Rights Project; attachment: preservation letter from Texas Civil Rights Project.
382	Email	12/9/2021 5:25 PM	12/9/2021 5:25 PM	Re: Preservation Letter Galveston County Redistricting 12-7-21[44].pdf		Jason Torchinsky <jtorchinsky@HoltzmanVogel.com>	tom@bryangeodemo.com	Phil Gordon <pgordon@holtzmanvogel.com>		Re Preservation Letter Galveston County Redistricting 12-7-21[44].pdf msg		Attorney-Client;Work-Product	Communica ion from Mr. Bryan to Mr. Torchinsky, re: legal obligations imposed on him by preservation letter.
383	Email	12/10/2021 12:42 PM	12/10/2021 12:42 PM	Proposed DOJ Response	Commissioner_Precincts_(Historical).shx;Galveston_Map1 10_28_21.shp.xml;Galveston_Map1 10_28_21.sbx;Galveston_Map1 10_28_21.shp;Galveston_Map2 10_28_21.sbn;Commissioner_Precincts_(Historical).dbf;Galveston_Map1 10_28_21.dbf;Commissioner_Precincts_(Historical).shp;Galveston_Map1 10_28_21.sbn;Commissioner_Precincts_(Historical).sbx;Galveston_Map2 10_28_21.shx;Commissioner_Precincts_(Historical).prj;Galveston_Map2 10_28_21.shp;Commissioner_Precincts_(Historical).shp.xml;Galveston_Map2 10_28_21.shp.xml;Galveston_Map2 10_28_21.dbf;Galveston_Map1 10_28_21.shx;Commissioner_Precincts_(Historical).sbn;Galveston_Map2 10_28_21.sbx	Drummond, Tyler <Tyler.Drummond@co galveston.tx.us>	Phil Gordon <pgordon@HoltzmanVogel.com>	Jason Torchinsky <jtorchinsky@HoltzmanVogel.com>		Proposed DOJ Response.msg		Attorney-Client;Work-Product	Communica ion from Mr. Gordon and Mr. Torchinsky, redistricting counsel, to Mr. Drummond providing legal advice and a proposed response to DOJ requests for informa ion about Maps 1 and 2.
384	Cad	12/10/2021 12:42 PM	12/10/2021 9:27 AM							Commissioner_Precincts_(Historical).sbn		Attorney-Client;Work-Product	Attachment to communication from Mr. Gordon and Mr. Torchinsky, redistricting counsel, to Mr. Drummond providing legal advice and a proposed response to DOJ requests for informa ion about Maps 1 and 2.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
385	Cad	12/10/2021 12:42 PM	12/10/2021 9:27 AM							Commissioner_Precincts_(Historical).sbx		Attorney-Client;Work-Product	Attachment to communication from Mr. Gordon and Mr. Torchinsky, redistricting counsel, to Mr. Drummond providing legal advice and a proposed response to DOJ requests for informa ion about Maps 1 and 2.
386	Cad	12/10/2021 12:42 PM	10/28/2021 10:32 AM							Galveston_Map1 10_28_21 shx		Attorney-Client;Work-Product	Attachment to communication from Mr. Gordon and Mr. Torchinsky, redistricting counsel, to Mr. Drummond providing legal advice and a proposed response to DOJ requests for informa ion about Maps 1 and 2.
387	Cad	12/10/2021 12:42 PM	10/28/2021 10:32 AM							Galveston_Map1 10_28_21 sbx		Attorney-Client;Work-Product	Attachment to communication from Mr. Gordon and Mr. Torchinsky, redistricting counsel, to Mr. Drummond providing legal advice and a proposed response to DOJ requests for informa ion about Maps 1 and 2.
388	Text	12/10/2021 12:42 PM	12/10/2021 9:27 AM							Commissioner_Precincts_(Historical).shp.xml		Attorney-Client;Work-Product	Attachment to communication from Mr. Gordon and Mr. Torchinsky, redistricting counsel, to Mr. Drummond providing legal advice and a proposed response to DOJ requests for informa ion about Maps 1 and 2.
389	Text	12/10/2021 12:42 PM	10/28/2021 11:32 AM							Galveston_Map2 10_28_21 shp.xml		Attorney-Client;Work-Product	Attachment to communication from Mr. Gordon and Mr. Torchinsky, redistricting counsel, to Mr. Drummond providing legal advice and a proposed response to DOJ requests for informa ion about Maps 1 and 2.
390	Cad	12/10/2021 12:42 PM	10/28/2021 11:32 AM							Galveston_Map2 10_28_21 sbx		Attorney-Client;Work-Product	Attachment to communication from Mr. Gordon and Mr. Torchinsky, redistricting counsel, to Mr. Drummond providing legal advice and a proposed response to DOJ requests for informa ion about Maps 1 and 2.

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392	Cad	12/10/2021 12:42 PM	10/28/2021 11:32 AM							Galveston_Map2 10_28_21 sbn		Attorney-Client;Work-Product	Attachment to communication from Mr. Gordon and Mr. Torchinsky, redistricting counsel, to Mr. Drummond providing legal advice and a proposed response to DOJ requests for informa ion about Maps 1 and 2.
393	Cad	12/10/2021 12:42 PM	10/28/2021 11:32 AM							Galveston_Map2 10_28_21 shx		Attorney-Client;Work-Product	Attachment to communication from Mr. Gordon and Mr. Torchinsky, redistricting counsel, to Mr. Drummond providing legal advice and a proposed response to DOJ requests for informa ion about Maps 1 and 2.
394	Database	12/10/2021 12:42 PM	12/10/2021 9:27 AM							Commissioner_Precincts_ (Historical).dbf		Attorney-Client;Work-Product	Attachment to communication from Mr. Gordon and Mr. Torchinsky, redistricting counsel, to Mr. Drummond providing legal advice and a proposed response to DOJ requests for informa ion about Maps 1 and 2.
395	Cad	12/10/2021 12:42 PM	12/10/2021 9:27 AM							Commissioner_Precincts_ (Historical).shp		Attorney-Client;Work-Product	Attachment to communication from Mr. Gordon and Mr. Torchinsky, redistricting counsel, to Mr. Drummond providing legal advice and a proposed response to DOJ requests for informa ion about Maps 1 and 2.
396	Database	12/10/2021 12:42 PM	10/28/2021 10:32 AM							Galveston_Map1 10_28_21 dbf		Attorney-Client;Work-Product	Attachment to communication from Mr. Gordon and Mr. Torchinsky, redistricting counsel, to Mr. Drummond providing legal advice and a proposed response to DOJ requests for informa ion about Maps 1 and 2.

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397	Cad	12/10/2021 12:42 PM	12/10/2021 9:27 AM							Commissioner_Precincts_(Historical).shx		Attorney-Client;Work-Product	Attachment to communication from Mr. Gordon and Mr. Torchinsky, redistricting counsel, to Mr. Drummond providing legal advice and a proposed response to DOJ requests for informa ion about Maps 1 and 2.
398	Text	12/10/2021 12:42 PM	12/10/2021 9:27 AM							Commissioner_Precincts_(Historical).prj		Attorney-Client;Work-Product	Attachment to communication from Mr. Gordon and Mr. Torchinsky, redistricting counsel, to Mr. Drummond providing legal advice and a proposed response to DOJ requests for informa ion about Maps 1 and 2.
399	Cad	12/10/2021 12:42 PM	10/28/2021 10:32 AM							Galveston_Map1 10_28_21 shp		Attorney-Client;Work-Product	Attachment to communication from Mr. Gordon and Mr. Torchinsky, redistricting counsel, to Mr. Drummond providing legal advice and a proposed response to DOJ requests for informa ion about Maps 1 and 2.
400	Cad	12/10/2021 12:42 PM	10/28/2021 10:32 AM							Galveston_Map1 10_28_21 sbn		Attorney-Client;Work-Product	Attachment to communication from Mr. Gordon and Mr. Torchinsky, redistricting counsel, to Mr. Drummond providing legal advice and a proposed response to DOJ requests for informa ion about Maps 1 and 2.
401	Text	12/10/2021 12:42 PM	10/28/2021 10:32 AM							Galveston_Map1 10_28_21 shp.xml		Attorney-Client;Work-Product	Attachment to communication from Mr. Gordon and Mr. Torchinsky, redistricting counsel, to Mr. Drummond providing legal advice and a proposed response to DOJ requests for informa ion about Maps 1 and 2.
402	Database	12/10/2021 12:42 PM	10/28/2021 11:32 AM							Galveston_Map2 10_28_21 dbf		Attorney-Client;Work-Product	Attachment to communication from Mr. Gordon and Mr. Torchinsky, redistricting counsel, to Mr. Drummond providing legal advice and a proposed response to DOJ requests for informa ion about Maps 1 and 2.

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403	Email	12/10/2021 2:01 PM	12/10/2021 2:01 PM	Fwd: Proposed DOJ Response	Commissioner_Precincts_(Historical).sbx;Galveston_Map1 10_28_21.shp;Commissioner_Precincts_(Historical).prj;Galveston_Map2 10_28_21.sbn;Commissioner_Precincts_(Historical).shp.xml;Galveston_Map1 10_28_21.dbf;Galveston_Map1 10_28_21.shp.xml;Commissioner_Precincts_(Historical).shx;Galveston_Map2 10_28_21.dbf;Galveston_Map2 10_28_21.shx;Galveston_Map2 10_28_21.shp;Galveston_Map2 10_28_21.sbx;Galveston_Map1 10_28_21.sbn;Galveston_Map1 10_28_21.sbx;Commissioner_Precincts_(Historical).shp;Galveston_Map2 10_28_21.shp.xml;Commissioner_Precincts_(Historical).dbf;Galveston_Map1 10_28_21.shx;Commissioner_Precincts_(Historical).	Henry, Mark <Mark.Henry@co.galveston.tx.us>;Paul Ready <paul@ready.law>	Drummond, Tyler <Tyler.Drummond@co.galveston.tx.us>			Fwd Proposed DOJ Response.msg		Attorney-Client;Work-Product	Communica ion from Mr. Drummond to County Judge Mark Henry and Galveston County General Counsel, forwarding redistricting counsel's legal advice and proposed response to DOJ requests for information about Maps 1 and 2.
404	Database	12/10/2021 2:01 PM	12/10/2021 9:27 AM							Commissioner_Precincts_(Historical).dbf		Attorney-Client;Work-Product	Attachment in communication from Mr. Drummond to County Judge Mark Henry and Galveston County General Counsel, forwarding redistricting counsel's legal advice and proposed response to DOJ requests for information about Maps 1 and 2.
405	Text	12/10/2021 2:01 PM	12/10/2021 9:27 AM							Commissioner_Precincts_(Historical).shp.xml		Attorney-Client;Work-Product	Attachment in communication from Mr. Drummond to County Judge Mark Henry and Galveston County General Counsel, forwarding redistricting counsel's legal advice and proposed response to DOJ requests for information about Maps 1 and 2.
406	Text	12/10/2021 2:01 PM	10/28/2021 11:32 AM							Galveston_Map2 10_28_21 shp.xml		Attorney-Client;Work-Product	Attachment in communication from Mr. Drummond to County Judge Mark Henry and Galveston County General Counsel, forwarding redistricting counsel's legal advice and proposed response to DOJ requests for information about Maps 1 and 2.

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408	Cad	12/10/2021 2:01 PM	12/10/2021 9:27 AM							Commissioner_Precincts_(Historical).sbn		Attorney-Client;Work-Product	Attachment in communication from Mr. Drummond to County Judge Mark Henry and Galveston County General Counsel, forwarding redistricting counsel's legal advice and proposed response to DOJ requests for information about Maps 1 and 2.
409	Cad	12/10/2021 2:01 PM	10/28/2021 11:32 AM							Galveston_Map2 10_28_21 shp		Attorney-Client;Work-Product	Attachment in communication from Mr. Drummond to County Judge Mark Henry and Galveston County General Counsel, forwarding redistricting counsel's legal advice and proposed response to DOJ requests for information about Maps 1 and 2.
410	Cad	12/10/2021 2:01 PM	12/10/2021 9:27 AM							Commissioner_Precincts_(Historical).shx		Attorney-Client;Work-Product	Attachment in communication from Mr. Drummond to County Judge Mark Henry and Galveston County General Counsel, forwarding redistricting counsel's legal advice and proposed response to DOJ requests for information about Maps 1 and 2.
411	Cad	12/10/2021 2:01 PM	12/10/2021 9:27 AM							Commissioner_Precincts_(Historical).shp		Attorney-Client;Work-Product	Attachment in communication from Mr. Drummond to County Judge Mark Henry and Galveston County General Counsel, forwarding redistricting counsel's legal advice and proposed response to DOJ requests for information about Maps 1 and 2.
412	Cad	12/10/2021 2:01 PM	10/28/2021 11:32 AM							Galveston_Map2 10_28_21 shx		Attorney-Client;Work-Product	Attachment in communication from Mr. Drummond to County Judge Mark Henry and Galveston County General Counsel, forwarding redistricting counsel's legal advice and proposed response to DOJ requests for information about Maps 1 and 2.

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413	Database	12/10/2021 2:01 PM	10/28/2021 11:32 AM							Galveston_Map2 10_28_21 dbf		Attorney-Client;Work-Product	Attachment in communication from Mr. Drummond to County Judge Mark Henry and Galveston County General Counsel, forwarding redistricting counsel's legal advice and proposed response to DOJ requests for information about Maps 1 and 2.
414	Cad	12/10/2021 2:01 PM	10/28/2021 11:32 AM							Galveston_Map2 10_28_21 sbn		Attorney-Client;Work-Product	Attachment in communication from Mr. Drummond to County Judge Mark Henry and Galveston County General Counsel, forwarding redistricting counsel's legal advice and proposed response to DOJ requests for information about Maps 1 and 2.
415	Database	12/10/2021 2:01 PM	10/28/2021 10:32 AM							Galveston_Map1 10_28_21 dbf		Attorney-Client;Work-Product	Attachment in communication from Mr. Drummond to County Judge Mark Henry and Galveston County General Counsel, forwarding redistricting counsel's legal advice and proposed response to DOJ requests for information about Maps 1 and 2.
416	Text	12/10/2021 2:01 PM	10/28/2021 10:32 AM							Galveston_Map1 10_28_21 shp.xml		Attorney-Client;Work-Product	Attachment in communication from Mr. Drummond to County Judge Mark Henry and Galveston County General Counsel, forwarding redistricting counsel's legal advice and proposed response to DOJ requests for information about Maps 1 and 2.
417	Cad	12/10/2021 2:01 PM	12/10/2021 9:27 AM							Commissioner_Precincts_ (Historical).sbx		Attorney-Client;Work-Product	Attachment in communication from Mr. Drummond to County Judge Mark Henry and Galveston County General Counsel, forwarding redistricting counsel's legal advice and proposed response to DOJ requests for information about Maps 1 and 2.
418	Cad	12/10/2021 2:01 PM	10/28/2021 10:32 AM							Galveston_Map1 10_28_21 shx		Attorney-Client;Work-Product	Attachment in communication from Mr. Drummond to County Judge Mark Henry and Galveston County General Counsel, forwarding redistricting counsel's legal advice and proposed response to DOJ requests for information about Maps 1 and 2.

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420	Cad	12/10/2021 2:01 PM	10/28/2021 11:32 AM							Galveston_Map2 10_28_21 sbx		Attorney-Client;Work-Product	Attachment in communication from Mr. Drummond to County Judge Mark Henry and Galveston County General Counsel, forwarding redistricting counsel's legal advice and proposed response to DOJ requests for information about Maps 1 and 2.
421	Cad	12/10/2021 2:01 PM	10/28/2021 10:32 AM							Galveston_Map1 10_28_21 sbx		Attorney-Client;Work-Product	Attachment in communication from Mr. Drummond to County Judge Mark Henry and Galveston County General Counsel, forwarding redistricting counsel's legal advice and proposed response to DOJ requests for information about Maps 1 and 2.
422	Cad	12/10/2021 2:01 PM	10/28/2021 10:32 AM							Galveston_Map1 10_28_21 sbn		Attorney-Client;Work-Product	Attachment in communication from Mr. Drummond to County Judge Mark Henry and Galveston County General Counsel, forwarding redistricting counsel's legal advice and proposed response to DOJ requests for information about Maps 1 and 2.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
423	Email	12/10/2021 2:01 PM	12/10/2021 2:01 PM	Fwd: Proposed DOJ Response	Commissioner_Precincts_(Historical).shx;Galveston_Map2 10_28_21.sbn;Galveston_Map2 10_28_21.dbf;Commissioner_Precincts_(Historical).shp.xml;Commissioner_Precincts_(Historical).prj;Galveston_Map2 10_28_21.shx;Galveston_Map2 10_28_21.shp;Galveston_Map1 10_28_21.shx;Galveston_Map1 10_28_21.sbn;Galveston_Map1 10_28_21.shp;Galveston_Map2 10_28_21.sbx;Commissioner_Precincts_(Historical).sbx;Galveston_Map1 10_28_21.dbf;Galveston_Map2 10_28_21.shp.xml;Galveston_Map1 10_28_21.shp.xml;Commissioner_Precincts_(Historical).sbn;Commissioner_Precincts_(Historical).dbf;Commissioner_Precincts_(Hi	Henry, Mark <Mark.Henry@co.galveston.tx.us>;Paul Ready <paul@ready.law>	Drummond, Tyler </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=2c5f9c72e05e4d9e8437fd599c045b6e-Drummond, T>			Fwd Proposed DOJ Response.msg		Attorney-Client;Work-Product	Communica ion from Mr. Drummond to County Judge Mark Henry and Galveston County General Counsel, forwarding redistricting counsel's legal advice and proposed response to DOJ requests for information about Maps 1 and 2.
424	Cad	12/10/2021 2:01 PM	10/28/2021 10:32 AM							Galveston_Map1 10_28_21 sbx		Attorney-Client;Work-Product	Attachment in communication from Mr. Drummond to County Judge Mark Henry and Galveston County General Counsel, forwarding redistricting counsel's legal advice and proposed response to DOJ requests for information about Maps 1 and 2.
425	Database	12/10/2021 2:01 PM	10/28/2021 11:32 AM							Galveston_Map2 10_28_21 dbf		Attorney-Client;Work-Product	Attachment in communication from Mr. Drummond to County Judge Mark Henry and Galveston County General Counsel, forwarding redistricting counsel's legal advice and proposed response to DOJ requests for information about Maps 1 and 2.
426	Cad	12/10/2021 2:01 PM	12/10/2021 9:27 AM							Commissioner_Precincts_(Historical).shp		Attorney-Client;Work-Product	Attachment in communication from Mr. Drummond to County Judge Mark Henry and Galveston County General Counsel, forwarding redistricting counsel's legal advice and proposed response to DOJ requests for information about Maps 1 and 2.

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428	Cad	12/10/2021 2:01 PM	12/10/2021 9:27 AM							Commissioner_Precincts_ (Historical).shx		Attorney-Client;Work-Product	Attachment in communication from Mr. Drummond to County Judge Mark Henry and Galveston County General Counsel, forwarding redistricting counsel's legal advice and proposed response to DOJ requests for information about Maps 1 and 2.
429	Cad	12/10/2021 2:01 PM	10/28/2021 11:32 AM							Galveston_Map2 10_28_21 sbn		Attorney-Client;Work-Product	Attachment in communication from Mr. Drummond to County Judge Mark Henry and Galveston County General Counsel, forwarding redistricting counsel's legal advice and proposed response to DOJ requests for information about Maps 1 and 2.
430	Database	12/10/2021 2:01 PM	12/10/2021 9:27 AM							Commissioner_Precincts_ (Historical).dbf		Attorney-Client;Work-Product	Attachment in communication from Mr. Drummond to County Judge Mark Henry and Galveston County General Counsel, forwarding redistricting counsel's legal advice and proposed response to DOJ requests for information about Maps 1 and 2.
431	Cad	12/10/2021 2:01 PM	10/28/2021 11:32 AM							Galveston_Map2 10_28_21 sbx		Attorney-Client;Work-Product	Attachment in communication from Mr. Drummond to County Judge Mark Henry and Galveston County General Counsel, forwarding redistricting counsel's legal advice and proposed response to DOJ requests for information about Maps 1 and 2.
432	Text	12/10/2021 2:01 PM	10/28/2021 10:32 AM							Galveston_Map1 10_28_21 shp.xml		Attorney-Client;Work-Product	Attachment in communication from Mr. Drummond to County Judge Mark Henry and Galveston County General Counsel, forwarding redistricting counsel's legal advice and proposed response to DOJ requests for information about Maps 1 and 2.

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433	Text	12/10/2021 2:01 PM	12/10/2021 9:27 AM							Commissioner_Precincts_(Historical).prj		Attorney-Client;Work-Product	Attachment in communication from Mr. Drummond to County Judge Mark Henry and Galveston County General Counsel, forwarding redistricting counsel's legal advice and proposed response to DOJ requests for information about Maps 1 and 2.
434	Cad	12/10/2021 2:01 PM	10/28/2021 11:32 AM							Galveston_Map2 10_28_21 shp		Attorney-Client;Work-Product	Attachment in communication from Mr. Drummond to County Judge Mark Henry and Galveston County General Counsel, forwarding redistricting counsel's legal advice and proposed response to DOJ requests for information about Maps 1 and 2.
435	Cad	12/10/2021 2:01 PM	12/10/2021 9:27 AM							Commissioner_Precincts_(Historical).sbx		Attorney-Client;Work-Product	Attachment in communication from Mr. Drummond to County Judge Mark Henry and Galveston County General Counsel, forwarding redistricting counsel's legal advice and proposed response to DOJ requests for information about Maps 1 and 2.
436	Cad	12/10/2021 2:01 PM	10/28/2021 10:32 AM							Galveston_Map1 10_28_21 sbn		Attorney-Client;Work-Product	Attachment in communication from Mr. Drummond to County Judge Mark Henry and Galveston County General Counsel, forwarding redistricting counsel's legal advice and proposed response to DOJ requests for information about Maps 1 and 2.
437	Cad	12/10/2021 2:01 PM	10/28/2021 10:32 AM							Galveston_Map1 10_28_21 shx		Attorney-Client;Work-Product	Attachment in communication from Mr. Drummond to County Judge Mark Henry and Galveston County General Counsel, forwarding redistricting counsel's legal advice and proposed response to DOJ requests for information about Maps 1 and 2.
438	Database	12/10/2021 2:01 PM	10/28/2021 10:32 AM							Galveston_Map1 10_28_21 dbf		Attorney-Client;Work-Product	Attachment in communication from Mr. Drummond to County Judge Mark Henry and Galveston County General Counsel, forwarding redistricting counsel's legal advice and proposed response to DOJ requests for information about Maps 1 and 2.

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440	Text	12/10/2021 2:01 PM	10/28/2021 11:32 AM							Galveston_Map2 10_28_21 shp.xml		Attorney-Client;Work-Product	Attachment in communication from Mr. Drummond to County Judge Mark Henry and Galveston County General Counsel, forwarding redistricting counsel's legal advice and proposed response to DOJ requests for information about Maps 1 and 2.
441	Cad	12/10/2021 2:01 PM	10/28/2021 11:32 AM							Galveston_Map2 10_28_21 shx		Attorney-Client;Work-Product	Attachment in communication from Mr. Drummond to County Judge Mark Henry and Galveston County General Counsel, forwarding redistricting counsel's legal advice and proposed response to DOJ requests for information about Maps 1 and 2.
442	Text	12/10/2021 2:01 PM	12/10/2021 9:27 AM							Commissioner_Precincts_ (Historical).shp.xml		Attorney-Client;Work-Product	Attachment in communication from Mr. Drummond to County Judge Mark Henry and Galveston County General Counsel, forwarding redistricting counsel's legal advice and proposed response to DOJ requests for information about Maps 1 and 2.
443	Email	12/10/2021 2:17 PM	12/10/2021 2:17 PM	Re: Proposed DOJ Response		Drummond, Tyler <Tyler.Drummond@co galveston.tx.us>	Paul Ready <paul@ready.law>	Henry, Mark <Mark.Henry@co.galveston.tx.us>;Phil Gordon <pgordon@holtzmanvogel.com>;Jason Torchinsky <jtorchinsky@holtzmanvogel.com>		Re Proposed DOJ Response.msg		Attorney-Client;Work-Product	Communica ion from Galveston County General Counsel to County Judge Mark Henry, Mr. Drummond, and redistricting counsel discussing legal guidance and proposed response to DOJ demands re: Maps 1 and 2.
444	Email	12/10/2021 2:18 PM	12/10/2021 2:18 PM	Re: Proposed DOJ Response		Paul Ready <paul@ready.law>	Drummond, Tyler <Tyler.Drummond@co.galveston.tx.us>	Henry, Mark <Mark.Henry@co.galveston.tx.us>;Phil Gordon <pgordon@holtzmanvogel.com>;Jason Torchinsky <jtorchinsky@holtzmanvogel.com>;Davidson, Zach <Zach.davidson@co.galveston.tx.us>		Re Proposed DOJ Response.msg		Attorney-Client;Work-Product	Communica ion from Mr. Drummond to County Judge Mark Henry, Galveston County General Counsel and redistricting counsel discussing legal guidance and proposed response to DOJ demands re: Maps 1 and 2.

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445	Email	12/10/2021 2:18 PM	12/10/2021 2:18 PM	Re: Proposed DOJ Response		Paul Ready <paul@ready.law>	Drummond, Tyler </o=ExchangeLabs/ou=Exchange Administrative Group (FYDIBOHF23SPDLT)/cn=Recipients/cn=2c5f9c72e05e4d9e8437fd599c045b6e-Drummond, T>	Henry, Mark <Mark.Henry@co.galveston.tx.us>;Phil Gordon <pgordon@holtzmanvogel.com>;Jason Torchinsky <jtorchinsky@holtzmanvogel.com>;Davidson, Zach <Zach.davidson@co.galveston.tx.us>		Re Proposed DOJ Response.msg		Attorney-Client;Work-Product	Communica ion from Mr. Drummond to County Judge Mark Henry, Galveston County General Counsel and redistricting counsel discussing legal guidance and proposed response to DOJ demands re: Maps 1 and 2.
446	Email	12/10/2021 2:20 PM	12/10/2021 2:20 PM	Re: Proposed DOJ Response		Paul Ready <paul@ready.law>;Drummond, Tyler <Tyler.Drummond@co galveston.tx.us>	Phil Gordon <pgordon@HoltzmanVogel.com>	Henry, Mark <Mark.Henry@co.galveston.tx.us>;Jason Torchinsky <jtorchinsky@HoltzmanVogel.com>		Re Proposed DOJ Response.msg		Attorney-Client;Work-Product	Communica ion from Mr. Gordon, redistricting counsel, wi h County Judge Mark Henry, Galveston County General Counsel, and Mr. Drummond discussing legal guidance and proposed response to DOJ demands re: Maps 1 and 2.
447	Email	12/10/2021 2:20 PM	12/10/2021 2:20 PM	Re: Proposed DOJ Response		Drummond, Tyler <Tyler.Drummond@co galveston.tx.us>;Paul Ready <paul@ready.law>	Phil Gordon <pgordon@HoltzmanVogel.com>	Henry, Mark <Mark.Henry@co.galveston.tx.us>;Jason Torchinsky <jtorchinsky@HoltzmanVogel.com>;Davidson, Zach <Zach.davidson@co.galveston.tx.us>		Re Proposed DOJ Response.msg		Attorney-Client;Work-Product	Communica ion from Mr. Gordon, redistricting counsel, wi h County Judge Mark Henry, Galveston County General Counsel, and Mr. Drummond discussing legal guidance and proposed response to DOJ demands re: Maps 1 and 2.
448	Email	12/10/2021 2:43 PM	12/10/2021 2:43 PM	RE: Proposed DOJ Response	comments.pdf;11-9-2021.pdf;11-3-2021.pdf;Screenshot of Comment Submittal Page.PNG	Drummond, Tyler <Tyler.Drummond@co galveston.tx.us>;Paul Ready <paul@ready.law>	Davidson, Zach <Zach.davidson@co.galveston.tx.us>	Henry, Mark <Mark.Henry@co.galveston.tx.us>;Phil Gordon <pgordon@holtzmanvogel.com>;Jason Torchinsky <jtorchinsky@holtzmanvogel.com>		RE Proposed DOJ Response.msg		Attorney-Client;Work-Product	Communica ion from Mr. Davidson, Galveston County Communications Director, to County Judge Mark Henry, Galveston County General Counsel, Mr. Drummond, and redistricting counsel providing additional informa ion in response to legal guidance and proposed response to DOJ demands re: Maps 1 and 2.
449	Image	12/10/2021 2:43 PM	12/10/2021 2:43 PM							Screenshot of Comment Submittal Page.PNG		Attorney-Client;Work-Product	Attachment to communication from Mr. Davidson, Galveston County Communications Director, to County Judge Mark Henry, Galveston County General Counsel, Mr. Drummond, and redistricting counsel providing additional informa ion in response to legal guidance and proposed response to DOJ demands re: Maps 1 and 2.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
450	Pdf	12/10/2021 2:43 PM	12/10/2021 2:24 PM							11-3-2021.pdf		Attorney-Client;Work-Product	Attachment to communication from Mr. Davidson, Galveston County Communications Director, to County Judge Mark Henry, Galveston County General Counsel, Mr. Drummond, and redistricting counsel providing additional informa ion in response to legal guidance and proposed response to DOJ demands re: Maps 1 and 2.
451	Pdf	12/10/2021 2:43 PM	12/10/2021 2:26 PM							11-9-2021.pdf		Attorney-Client;Work-Product	Attachment to communication from Mr. Davidson, Galveston County Communications Director, to County Judge Mark Henry, Galveston County General Counsel, Mr. Drummond, and redistricting counsel providing additional informa ion in response to legal guidance and proposed response to DOJ demands re: Maps 1 and 2.
452	Email	12/10/2021 2:43 PM	11/12/2021 2:28 PM	*NEW SUBMISSION* Public Comment		Redistricting	Galveston County			comments.pdf		Attorney-Client;Work-Product	Attachment to communication from Mr. Davidson, Galveston County Communications Director, to County Judge Mark Henry, Galveston County General Counsel, Mr. Drummond, and redistricting counsel providing additional informa ion in response to legal guidance and proposed response to DOJ demands re: Maps 1 and 2.
453	Email	12/10/2021 2:43 PM	12/10/2021 2:43 PM	RE: Proposed DOJ Response	comments.pdf;11-3-2021.pdf;Screenshot of Comment Submittal Page.PNG;11-9-2021.pdf	Drummond, Tyler <Tyler.Drummond@co galveston.tx.us>;Paul Ready <paul@ready.law>	Davidson, Zach </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=F8C40B000DB84CEDB3DECE867F09EEA7-DAVIDSON, Z>	Henry, Mark <Mark.Henry@co.galveston.tx.us>;Phil Gordon <pgordon@holtzmanvogel.com>;Jason Torchinsky <jtorchinsky@holtzmanvogel.com>		RE Proposed DOJ Response.msg		Attorney-Client;Work-Product	Communica ion from Mr. Davidson, Galveston County Communications Director, to County Judge Mark Henry, Galveston County General Counsel, Mr. Drummond, and redistricting counsel providing additional informa ion in response to legal guidance and proposed response to DOJ demands re: Maps 1 and 2.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
454	Pdf	12/10/2021 2:43 PM	12/10/2021 2:24 PM							11-3-2021.pdf		Attorney-Client;Work-Product	Attachment to communication from Mr. Davidson, Galveston County Communications Director, to County Judge Mark Henry, Galveston County General Counsel, Mr. Drummond, and redistricting counsel providing additional informa ion in response to legal guidance and proposed response to DOJ demands re: Maps 1 and 2.
455	Email	12/10/2021 2:43 PM	11/12/2021 2:28 PM	*NEW SUBMISSION* Public Comment		Redistricting	Galveston County			comments.pdf		Attorney-Client;Work-Product	Attachment to Communica ion from Mr. Davidson, Galveston County Communications Director, to County Judge Mark Henry, Galveston County General Counsel, Mr. Drummond, and redistricting counsel providing additional informa ion in response to legal guidance and proposed response to DOJ demands re: Maps 1 and 2.
456	Image	12/10/2021 2:43 PM	12/10/2021 2:43 PM							Screenshot of Comment Submittal Page.PNG		Attorney-Client;Work-Product	Attachment to communication from Mr. Davidson, Galveston County Communications Director, to County Judge Mark Henry, Galveston County General Counsel, Mr. Drummond, and redistricting counsel providing additional informa ion in response to legal guidance and proposed response to DOJ demands re: Maps 1 and 2.
457	Pdf	12/10/2021 2:43 PM	12/10/2021 2:26 PM							11-9-2021.pdf		Attorney-Client;Work-Product	Attachment to communication from Mr. Davidson, Galveston County Communications Director, to County Judge Mark Henry, Galveston County General Counsel, Mr. Drummond, and redistricting counsel providing additional informa ion in response to legal guidance and proposed response to DOJ demands re: Maps 1 and 2.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
458	Email	12/10/2021 2:47 PM	12/10/2021 2:47 PM	Re: Proposed DOJ Response		Davidson, Zach <Zach.davidson@co.galveston.tx.us>	Paul Ready <paul@ready.law>	Drummond, Tyler <Tyler.Drummond@co.galveston.tx.us>;Henry, Mark <Mark.Henry@co.galveston.tx.us>;Phil Gordon <pgordon@holtzmanvogel.com>;Jason Torchinsky <jtorchinsky@holtzmanvogel.com>		Re Proposed DOJ Response.msg		Attorney-Client;Work-Product	Communica ion from Galveston County General Counsel to County Judge Mark Henry, Mr. Drummond, and redistricting counsel discussing legal advice and strategy and additional information provided by Mr. Davidson for inclusion in proposed response to DOJ demands.
459	Email	12/10/2021 2:50 PM	12/10/2021 2:50 PM	Re: Proposed DOJ Response		Paul Ready <paul@ready.law>;Davidson, Zach <Zach.davidson@co.galveston.tx.us>	Phil Gordon <pgordon@HoltzmanVogel.com>	Drummond, Tyler <Tyler.Drummond@co.galveston.tx.us>;Henry, Mark <Mark.Henry@co.galveston.tx.us>;Jason Torchinsky <jtorchinsky@HoltzmanVogel.com>		Re Proposed DOJ Response.msg		Attorney-Client;Work-Product	Communica ion from Mr. Gordon, redistricting counsel, wi h County Judge Mark Henry, Galveston County General Counsel, Mr. Drummond, and other redistricting counsel confirming final guidance and response to DOJ demands re: Maps 1 and 2.
460	Email	5/10/2022 11:07 AM	5/10/2022 11:07 AM	Order - Appointment of Commissioner	Appointment of Commissioner.docx	Paul Ready' <paul@ready.law>	Liechty, Linda </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B96C1DB7FD324A26AEC676ED21FB837B-LIECHTY, LI>			Order - Appointment of Commissioner.msg		Attorney-Client;Work-Product	Communica ion from Ms. Linda Liechty to Galveston County General Counsel, seeking legal advice and edits to proposed appointment order of Dr. Robin Armstrong to the Commissioners Court.
461	Word	5/10/2022 11:07 AM	5/10/2022 11:01 AM							Appointment of Commissioner.docx	Drummond, Tyler	Attorney-Client;Work-Product	Attachment to communication from Ms. Linda Liechty to Galveston County General Counsel, seeking legal advice and edits to proposed appointment order of Dr. Robin Armstrong to the Commissioners Court.
462	Email	5/10/2022 11:34 AM	5/10/2022 11:34 AM	Re: Order - Appointment of Commissioner	Appointment of Commissioner-1-1.docx	Liechty, Linda <Linda.Liechty@co galveston.tx.us>	Paul Ready <paul@ready.law>			Re Order - Appointment of Commissioner.msg		Attorney-Client;Work-Product	Response from Galveston County General Counsel re: communication from Ms. Linda Liechty to Galveston County General Counsel, seeking legal advice and edits to proposed appointment order of Dr. Robin Armstrong to the Commissioners Court.
463	Word	5/10/2022 11:34 AM	5/10/2022 11:01 AM							Appointment of Commissioner-1-1.docx	Drummond, Tyler	Attorney-Client;Work-Product	Attachment to response from Galveston County General Counsel re: communication from Ms. Linda Liechty to Galveston County General Counsel, seeking legal advice and edits to proposed appointment order of Dr. Robin Armstrong to the Commissioners Court.

Doc ID	Document Type	Family Date	Date (DISCO Date)	Subject	Plog Attachment Names	To	From	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
464	Email	5/10/2022 11:40 AM	5/10/2022 11:40 AM	RE: Order - Appointment of Commissioner		Paul Ready' <paul@ready.law>	Liechty, Linda </O=EXCHANGELABS/OU=EXCHANGE ADMINISTRATIVE GROUP (FYDIBOHF23SPDLT)/CN=RECIPIENTS/CN=B96C1DB7FD324A26AEC676ED21FB837B-LIECHTY, LI>			RE Order - Appointment of Commissioner.msg		Attorney-Client;Work-Product	Reply communication from Ms. Linda Liechty to Galveston County General Counsel re: response from Galveston County General Counsel re: communication from Ms. Liechty to Galveston County General Counsel, seeking legal advice and edits to proposed appointment order of Dr. Robin Armstrong to the Commissioners Court.

EXHIBIT 2

HVJT PLLC
Attorneys at Law

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January 20, 2021

VIA EMAIL
paul@ready.law
Galveston County, Texas
c/o Paul Ready
Ready Law Firm, PLLC
1300 McGowen Street
Suite 120
Houston, TX 77004

Re: Holtzman Vogel Josefiak Torchinsky PLLC Engagement Letter

Dear Mr. Ready:

We are very pleased to provide legal services to you and to provide this engagement letter which will set forth the current fee arrangement and terms under which Holtzman Vogel Josefiak Torchinsky, PLLC ("Counsel" or the "Firm") will represent Galveston County, Texas ("Client") in connection with legal advice relating to the creation of the Galveston County Commission map.

Specifically, the Firm has been engaged to provide legal representation and advice regarding redistricting in Galveston County, Texas, including provision of a technical expert to draw the map. The firm will be associated with Dale Oldham, P.C. in representation on this matter.

The terms of our engagement, which shall apply to all matters pertaining to this engagement and the relationship between Client and the Firm, are set forth on the following pages. If you approve of the terms, please execute this agreement in the space provided and return it to my office.

At this time, our Texas Bar attorney Phil Gordon (Of Counsel at HVJT), assisted by Dale Oldham and Jason Torchinsky will be primarily responsible for overseeing representation and will serve as your principal contacts with respect to this engagement. Other partners, associates and professional staff will also be engaged to assist as may be appropriate. Please contact us with any questions or concerns that you may have about our work or any other aspect of our representation.

We look forward to working with you and appreciate your confidence in our firm.

Sincerely,

Jill Holtzman Vogel

Commencement of Representation

To protect both Client and Counsel, this agreement will not take effect until Client returns a signed copy of this Agreement.

Legal Fees

Counsel is charging Client a flat fee of Eighty Thousand Dollars ($80,000) plus any authorized expenses for which Counsel will provide the representation set forth above. This one-time flat fee is to be paid on the following schedule:

- $10,000 upon execution of this engagement letter;
- $15,000 per month beginning the month the Texas PL 94 data is released for each of 4 months;
- $10,000 upon adoption of the maps.

Any additional legal work outside the scope of the representation set forth above will be charged at Counsel's usual and customary hourly fees, including legal fees and expenses to be charged for any litigation over the maps. Hourly fees range from $350 per hour for junior associates to $1,300 for senior partners (billed in .25 hour increments). Billable rates are established by the rate for services as measured by the local Washington-area market. Our statements for professional services will be based upon the amount of time spent by partners, associates, paralegals, and other professionals who perform services on your behalf and their respective hourly rates as then in effect

Costs and Expenses

Counsel will bill separately for any out-of-pocket expenses arising out of this agreement, including costs and expenses incurred for computer research, delivery charges, agency costs and filing fees.

Client Discharge or Counsel Withdrawal

Client may discharge Counsel at any time and Counsel may withdraw at any time at Counsel's discretion. In either such circumstance, Client agrees to sign the documents necessary to permit Counsel to withdraw.

Client has been informed that among the events that should be expected to cause Counsel's withdrawal from this matter are Client's breach of any portion of this Agreement (including its payment provisions), Client's refusal to cooperate with Counsel, or to follow Counsel's advice on a material matter, or any other fact or circumstance that would render Counsel's continuing representation unlawful, unethical, or impractical.

Disclaimer of Guarantee

Nothing in this Agreement and nothing in Counsel's statements to Client will be construed as a promise or guarantee regarding any outcome in Client's legal matters.

No advice is given regarding tax consequences, and Counsel specifically is not providing tax advice, although questions relating to tax matters may very well come up during the course of representation. Client agrees to seek tax advice elsewhere, and to hold Counsel harmless from any tax effects.

Effective Date and Severability

This agreement will take effect when Client has performed the conditions stated in paragraph one, but its effective date will be retroactive to the date Counsel first provided services, if earlier. Even if this Agreement does not take effect, Client will be obligated to pay Counsel the reasonable value of any services Counsel may have performed for Client.

The provision of this Agreement is severable. This means that if one or more provisions of this Agreement are found to be void or unenforceable for any reason, the remaining provisions of this Agreement will still apply.

Scope of Client Engagement

Unless otherwise noted, the client for purposes of this representation is the Client , and not any affiliates of such person or entity.

Counsel represents many other companies and individuals in a variety of matters. It is possible that during the course of the representation, other present or future clients will have disputes with you. As a condition to undertaking the current representation, it is agreed that Counsel may continue to represent or in the future undertake to represent existing or new clients in matters not substantially related to the current representation, even if the interests of such other clients are directly adverse to your interests. This consent shall not apply in the event that during the course of representation Counsel has obtained sensitive, proprietary, or other confidential information, of a non-public nature, that could be used to the advantage of such other client or to your disadvantage in any matter for which Counsel is approached for representation by that client.

Termination of Representation

Client has the right at any time to terminate representation upon notice to Counsel. Such termination does not, however, relieve Client of the obligation to pay for all services rendered and expenses paid or incurred on behalf of the client prior to or in connection with such termination.

Conclusion of Representation

The Counsel-client relationship is terminated upon completion of the services that Counsel has been retained to perform. If Counsel is later retained to perform further or additional services, the Counsel-client relationship will be revived subject to these terms of engagement, as they may be supplemented or changed at that time.

Agreed to and Accepted:

Name: Galveston County, Texas

By:

Mark Henry, County Judge

Date: April 5, 2021

EXHIBIT 3

* * * ROUGH DRAFT * * *

THE VIDEOGRAPHER: Good morning. We're going on record at 9:17 a.m. Today's date is January 5, 2023. This is Media 1 of the video recorded deposition of Darrell Apffel.

Ms. Court Reporter, please swear in the witness.

DARRELL APFFEL,

having been first duly sworn, testified as follows:

EXAMINATION

BY MS. VALL-LLOBERA:

Q. Good morning, Mr. Apffel.

A. Good morning.

Q. Could you please state your name for the record and spell it?

A. Darrell Apffel, D-A-R-R-E-L-L, A-P-F-F-E-L.

Q. Good morning, thank you for your time today. My name is Diana Vall-Llobera, I work at the law firm, of Wilkie Farr & Gallgher? And I'm joined by co-counsel Sarah Chen, from Texas civil rights project, and Andrew Silberstein, who is also working for Wilkie Farr.

We are the attorneys for the Plaintiff, in Dickinson bay area branch, NAACP Galveston branch,

11:40:50 1 1965 so that minority residents twin the
11:40:54 2 jurisdiction compose a sizable portion of the
11:40:56 3 overall population, the boundaries drawn to
11:41:00 4 accomplish numerical neither fragment, dilute or
11:41:03 5 unfairly impact that minority population to
11:41:06 6 restrict the minority's ability to have an impact
11:41:09 7 on the outcome of an election within the
11:41:13 8 commissioner precinct where the minority population
11:41:14 9 is located.
11:41:16 10 Did I read that correctly?
11:41:16 11 A. You did.
11:41:16 12 Q. What did you understand by this paragraph?
11:41:23 13 A. Well, it's referring to the Voting Rights
11:41:24 14 Act of 1965, that I still am not clear on. But
11:41:32 15 what I understood that to mean is we have to follow
11:41:34 16 the law in redistricting, and so while I didn't
11:41:42 17 break down the law specifically, I knew that that's
11:41:45 18 what we were hiring people to do, and we did.
11:41:49 19 Q. Beneath that, 2-A, 2-B, and 2-C, there are
11:41:59 20 three -- there's a few definitions. Could you read
11:42:01 21 the first one out loud, for the record?
11:42:05 22 A. What about talking about, A.
11:42:09 23 Q. A?
11:42:09 24 A. Cracked for fragment. Order meaning, large
11:42:14 25 portions of minorities could not be divided into

several commissioner precincts, rather than left intact in a single or even multiple commissioner courts or precincts.

Did I read that correctly?

Q. Yes. Did that definition -- did you understand that definition?

A. That all goes to the law. And so, I didn't -- I didn't -- I trusted the people that we hired to -- to look at the population and draw the maps, in as equal as we could get them and follow the bounds of the law.

Q. Did you understand what packed or stacked mean?

A. I do not.

Q. In the context of redistricting?

Returning to page 5 of their proposal, towards the top, there is a heading that says, steps in redistricting.

Do you see that?

A. I do.

Q. This has a proposal -- you know, a proposed timeline, did you review this at the time?

A. Same answer. I don't remember specifically.

Q. Were --

A. Again this is -- this is two firms, touting

shown me, were just about mapping. That one said not only will we draw the maps for you, we will handle your litigation, as part of it.

Q. Did you expect litigation?

A. Absolutely not.

Q. So why was that a factor in hiring Oldham?

A. Because it would make good business sense to me, that not only -- these people were putting their money where their mouth is to say our maps were going to be within the bounds of law, so much that we will -- we will handle any litigation as part of our fees.

Q. Did it strike you as odd that they would include litigation -- expected litigation?

A. No.

Q. Assistant part of their proposal?

A. It struck me, it struck me as good, that, hey, look, it's a guarantee, a warranty of the work.

Q. (BY MS. VALL-LLOBERA) What did you know Mr. Mr. Oldham's background, at this time?

A. Nothing.

Q. Did -- did you --

A. I knew that he had assisted the county in the maps before. That's what I had found out.

how -- how to proceed. Wait, was that -- that was...

Q. (BY MS. VALL-LLOBERA) Did you -- did you seek out any information regarding the redistricting process?

A. No.

Q. What steps did you take to -- to fill in this knowledge gap of yours, regarding the redistricting process?

A. I asked Judge Henry -- typically, in the past, I believe that Ken Clark was the one commissioner that assisted with the redistricting and so I asked, Judge Henry, hey, when redistricting kicks off, if it kicks off, would you include me, because I wanted to be included.

Q. What did Judge Henry say?

A. Absolutely, we need to schedule a meeting with Dale Oldham, and when that happens, I'll let you know.

Q. Did that meeting take place?

A. It did.

Q. When did that meeting take place?

A. I don't remember -- I'm -- I'm guessing at or about -- after the census data came out, a phone conference was set up between me, and Dale Oldham,

and our other attorney, Paul Ready, and mark Henry, and Tyler Drummond.

And I participated in that call.

Q. So did this meeting occur at your request?

A. No.

Q. So they were including you in a meeting, at --

A. At my request. The way I understood it was okay, at some point, I had said I would like to be the in redistricting with you, Judge Henry, if -- as things move along, and so, he set up a first phone conference to get started, sometime after that, and they included me.

Q. Did you prepare for that phone conference?

A. No.

Q. What other steps did you take to learn more about redistricting, other than asking Judge Henry to be included?

A. That's it.

Q. Did you reach out to Mr. Oldham, about redistricting, once the contract was signed?

A. Only -- only that call that I have just previously referenced.

Q. Did you request that call with Mr. Oldham?

A. No, no. So are you saying did I reach out

12:30:03 1 Q. (BY MS. VALL-LLOBERA) Did Mr. Oldham
12:30:04 2 discuss any factors?
12:30:08 3 MR. RUSSO: Objection; I'll instruct
12:30:09 4 the witness not to answer, based upon
12:30:11 5 attorney-client privilege.
12:30:12 6 Q. (BY MS. VALL-LLOBERA) If a constituent
12:30:18 7 asked you about the redistricting process and asked
12:30:20 8 what kind of things you were thinking about in
12:30:23 9 redrawing the maps, what would you have said --
12:30:28 10 what would you say?
12:30:28 11 A. I would say our county grew by whatever
12:30:33 12 number, 80,000 people. Whatever the number was. I
12:30:36 13 don't remember the number. And the law requires us
12:30:41 14 to balance the precincts, based on that population,
12:30:47 15 and we've hired a law firm, and a demographer to
12:30:51 16 do -- to do that for us the best way possible to be
12:30:55 17 within the bounds of law.
12:30:56 18 Q. Did you discuss the Voting Rights Act?
12:31:03 19 A. Never.
12:31:05 20 MR. RUSSO: Objection. What -- what
12:31:06 21 are you talking about? Are you talking about a
12:31:08 22 meeting were who are -- with who?
12:31:11 23 Q. Referring, still, to the September 8, 2021,
12:31:14 24 meeting, and your other meeting with Mr. Oldham,
12:31:19 25 the in person conference? Did you discuss the

EXHIBIT 4

meeting, the five public hearings, and the August 30th hearing, does that comport with your memory?

A. To the extent I have a memory, yes.

Q. Is there any reason you think that was not accurate?

A. No.

Q. Okay. Do you recall if you reviewed this letter and its exhibits before it was submitted to the Department of Justice?

A. I do not remember.

Q. Okay. Would you have reviewed this letter before it was submitted on the county's behalf?

A. I would probably have gotten a copy of it. But if we we're -- if they're saying that -- that they're under -- if they're racing against the clock, I may not have. I just don't remember.

Q. Okay. But you have seen -- do you recall just seeing this letter in general?

A. No, not in general. I mean, again, I'm going to say I probably saw it, but I sure don't remember it.

Q. Okay.

MS. KLEIN: Can we go to Page 3, please?

Q. (BY MS. KLEIN) What about these tables on page 3, do those look familiar to you?

A. No. I mean, I know what they are by looking at

them, but they don't -- they're not familiar to me.

Q. What are they?

A. They are demographic makeup of -- the first one says existing districts total population. The second one says 2011 adopted districts total population.

Q. So you would have reviewed this letter at some point. That was your testimony before?

MR. RUSSO: Objection, misstates prior testimony. Asked and answered.

THE WITNESS: Yeah, not necessarily. I mean, this is, you know, why we pay the lawyers to make sure it's legally compliant.

Q. (BY MS. KLEIN) Would you have let your lawyers submit something without you reviewing it first for accuracy?

MR. RUSSO: Objection, calls for speculation.

THE WITNESS: I certainly wouldn't prefer that. But if they were getting close to the deadline as it looks like they might have been, they might have done it without my being able to review it first.

Q. (BY MS. KLEIN) Would you have reviewed it afterwards to make sure it was accurate?

A. Probably. Probably.

Q. All right. Turning to the map that was passed

to do. And so if they told us to adopt criteria, we did. If they didn't, I didn't.

Q. Okay. And it sounds like from your previous statement there were criteria used to evaluate the maps, though, correct?

A. Legally compliant and that encompasses a lot of things, certainly the DRA in 2011. But also the population redistribution and, like I said, legal, has to be legally compliant and legally defense able.

Q. Let me ask you a little bit about that. What was your understanding back in 2011 of what the Voting Rights Act would require?

A. I have no way of knowing. That's why I hire lawyers.

Q. All right. Let's go to -- let's pull up Tab 4. I'm going to show you a document that hopefully will jog your memory. This will be Exhibit 10.

(Exhibit No. 10 was marked.)

Q. (BY MS. KLEIN) All right. So this is an email from Patricia Grady to you, correct?

A. Correct.

Q. And that's August 2011?

A. Yes.

Q. That's during the process we talked about earlier?

MS. KLEIN: We'll send that to the court reporter. We'll copy defense counsel, obviously, on that email to the court reporter and defense counsel can let us know if the slip sheet is not acceptable.

MR. RUSSO: I appreciate that. Thank you.

MS. KLEIN: I guess it will go in the Zoom chat.

Q. (BY MS. KLEIN) All right. Moving on.

What was your understanding at the time of the 2011 redistricting processing, so specifically August 2011, of what the Voting Rights Acts would require?

A. I don't know if I had an understanding. And again, that's why we hired attorneys who knew it inside and out and knew to keep us compliant.

Q. So it's your duty to -- we talked about this earlier. It's your responsibility to preside over the proceedings of redistricting the county commissioners' districts, correct?

A. Correct.

Q. And so you -- in order to exercise that legislative function of new commissioners' precincts, you had to have an understanding of what maps would be legally compliant and what weren't, correct?

A. No. That's why I hired these lawyers. I mean,

there's -- that -- my understanding that is a area of practice all unto itself, that people specialize in just that area. And that's why we hired lawyers who knew that area very well.

Q. You at least had an understanding that the Voting Rights Act in 2011 would require maintaining at least one majority/minority precinct, Precinct 3, right?

A. I think that I knew that, yes, because they told me that.

Q. 2011 enacted --

MR. RUSSO: Be careful not to disclose communications --

THE WITNESS: Oh, yeah. Right.

MR. RUSSO: -- between counsel and the county in terms of legal services being provided.

THE WITNESS: Okay.

Q. (BY MS. KLEIN) That 2011 active map, was it ever used in an election?

A. We had -- we had adopted another map in 2013, right?

Q. Do you remember why you did that?

A. Because of a settlement with DOJ.

Q. Correct.

A. Okay.

Q. Do you remember that the DOJ -- well, I guess

entry 1, the first right up there, it says the family date is June 2, 2011. And -- oh, if you could -- You're -- the screen -- if you could zoom out a little bit because a little bit of the screen is covered by -- there we go.

Q. (BY MS. KLEIN) It says, (Reading:) Communication from Judge Henry to redistricting counsel requesting legal review of draft redistricting criteria. Correct?

MR. RUSSO: Do you see that?

THE WITNESS: Uh-huh. Yes.

Q. (BY MS. KLEIN) Is it -- would it make sense that the document, Exhibit 12 that we just went over, was the criteria you sent for your counsel to review?

MR. RUSSO: Objection, calls for speculation.

THE WITNESS: I -- I don't know.

Q. (BY MS. KLEIN) Do you remember -- well, strike that. We can take this down.

So we've talked about how the DOJ objected to that and you mentioned something about a settlement, I think, earlier. Do you remember that the Commissioner's Court precinct map was redrawn in 2012?

A. I remember it was redrawn. I thought it was '13, but it could have been '12.

Q. In 2012 or 2013?
A. Yes.
Q. Were you involved in that redrawing process?
A. No.
Q. Who was?
A. The lawyers, Dale Oldham, Joe Nixon.
Q. Did you provide input on it?
A. I doubt it.
Q. Okay. Did you approve it before it was submitted for --
A. I'm sure they would have said this is -- this will be accepted by Justice. So that's what I need to hear.
Q. Are you aware of the 2013 Supreme Court opinion called Shelby County v. Holder?
A. I hear them talking about it. I do not pretend to know what it deals with.
Q. Did that decision change in any way your expectations for what would be required in county commissioner redistricting?
MR. RUSSO: Objection, calls for speculation. Calls for a legal conclusion.
THE WITNESS: Yeah, I -- I know it's a landmark case. That's about all I know about it. So no, it could not have changed my idea of what we're

going to do.

Q. (BY MS. KLEIN) Do you remember saying that that opinion made it easier to redistrict?

MR. RUSSO: Objection, asked and answered, calls for speculation, asks for a legal conclusion.

THE WITNESS: I said it would make it easier?

Q. (BY MS. KLEIN) Yeah, do you remember saying that?

A. Only if the lawyer said it would make it easier.

Q. And just to be clear, I'm not asking you for a legal conclusion.

A. Okay.

Q. Just your personal understanding.

A. Okay.

Q. I don't want to know whether you agree with what your lawyers told you or you don't. I don't want to know any of that stuff, just your understanding of what was going on.

A. I'm guessing they conveyed to me that this would make it somewhat easier.

Q. I mean, do you remember being told at the time to hold off on new precincts -- after Shelby to hold off on new precincts for the justice of the peace because

received your retainer yet." Yeah, you're not going to.

Q. Did you share this solicitation with any of the other commissioners?

A. I think they sent it to all of them individually.

Q. Did you ever discuss this -- retaining or not retaining Allison, Bass & Magee for redistricting with the other commissioners?

A. No.

Q. And why specifically don't -- did you not want to retain this specific law firm?

MR. RUSSO: Objection, asked and answered.

THE WITNESS: He's probably my lawyer on another case and so I'm trying to be careful not to discuss that. So can I just leave it at I don't think he does a good job?

Q. (BY MS. KLEIN) Sure. So the county ended up retaining the firm Holtzman, Vogel, Josefiak, Torchinsky to assist with the 2021 redistricting in April of 2021; is that correct?

A. That's sounds right, yes.

Q. Holtzman Vogel, I'm going to refer to them just with those two first names, if that makes sense.

A. Absolutely.

Q. Holtzman Vogel are the same counsel

representing you in this litigation, correct?

A. Correct.

Q. I'm going to refer to them as redistricting counsel going forward. Make sense?

A. Yes.

Q. And they were also working with Dale Oldham at your request, correct?

A. Basically, yes. I can't recall if Dale and them worked together already or if when we retained Dale, they agreed to work. I can't remember exactly how it happened. But essentially, yes.

Q. And so what was your -- how would you characterize your role in coordinating the retention of Holtzman Vogel and Dale Oldham for the 2021 redistricting process?

A. I would have -- I know that we had discussions with Dale and then -- again, I can't recall exactly how it all worked together. But then there would have been a retention with redistricting counsel to include Dale. Is that your -- is that your question?

Q. My question is a little bit different. What was your role specifically distinguishing among other commissioners?

A. Re-coordinating the effort.

Q. Do you remember that retaining counsel was put

Q. (BY MS. KLEIN) Other than Dale Oldham, do you know of any other counsel who worked -- who represented you in the 2021 process that also specifically had worked with you in 2011 on the redistricting process?

A. No, I -- no.

Q. Do you remember what discussion, if any, there was in the April 2021 meeting where you decided to retain counsel what discussion there was at that meeting about retaining counsel?

A. There was no discussion. It's on consent.

Q. Which means it just goes to a vote?

A. Right.

Q. Do you remember the vote on this item?

A. I do not. Unless someone pulled it off, it was everyone present, but I don't know who was present at that meeting.

Q. Let's go to the meeting minutes for this. That's Tab 33. And this will be Exhibit 19.

(Exhibit No. 19 was marked.)

Q. (BY MS. KLEIN) Do you want to guess who voted for and who voted against?

A. Was it --

MR. RUSSO: Objection, calls for speculation.

THE WITNESS: Was it removed from consent

MR. RUSSO: Objection, calls for impartial and incomplete hypothetical.

You can answer.

And asked and answered.

Q. (BY MS. KLEIN) It's possible is your answer?

A. Possible.

Q. And what about the third one -- the second one from the top, (Reading:) Whereas, redistricting criteria will assist the County in its efforts to comply with all applicable federal and state laws.

Do you agree with that statement in light of the criteria you just read?

MR. RUSSO: Object, incomplete hypothetical and assumes -- I'm sorry, asked and answered.

THE WITNESS: I don't see how that criteria would assist the county in its efforts to comply with the federal law.

Q. (BY MS. KLEIN) Why not?

A. Because I don't know the federal law well enough to know -- again, that's why we hire lawyers.

Q. Okay. Let's scroll down to .9 of the criteria. .9 says, (Reading:) The redistricting plan should not fragment a geographically compact minority community or pack minority voters in a presence of a -- of polarized voters so as to create liability under Section 2 of the

Q. (BY MS. KLEIN) So I apologize for how small this is. But this is an Excel file that was attached to that. And you'll see below -- you see those tabs below there?

A. Tabs below where?

Q. On the bottom of the document.

A. Oh, yes. Yes.

Q. And let's look at -- do you remember seeing any data sheet like this?

A. No.

Q. Okay. Were you aware that data sheets like this were being run for the maps that were being proposed?

A. No.

Q. And can we -- are you surprised to learn that these types of statistics were being run for the maps being proposed?

A. No, I'm not surprised.

Q. Why aren't you surprised?

A. Why am I not -- I mean, I assume that this is kind of something that Dale might do. I don't know.

Q. So what kind of data analysis did you expect Dale to do?

A. Population.

Q. Anything else?

A. Voting age population. Again, that's why I hired him. I don't -- I don't know what he does or how to do it.

Q. And what about -- let's go to the sixth tab from the left called VTD political pivot. All the way, the sixth from the left.

A. Sixth from the left.

Q. VTD political pivot. Actually, maybe -- maybe let's go to pop pivot first. So this document -- the columns G, H, and I, you can see BNH VAP. Do you know what that means?

MR. RUSSO: Objection, calls for speculation.

THE WITNESS: I think it's voting age population.

Q. (BY MS. KLEIN) Do you know what the BNH mean?

A. I do not.

Q. And what about HISP VAP in column H, do you know what that means?

A. I'm going to guess Hispanic, but I don't know that for sure.

Q. And then BNH, does black non-Hispanic, is that a term you're familiar with?

A. No.

Q. But Hispanic VAP that's -- these are racial

MR. RUSSO: Misstates prior testimony.

THE WITNESS: I will say maybe. The map that got rejected, I don't recall it that well. So I mean, the one that gotten enacted I do.

Q. (BY MS. KLEIN) So are you saying that -- so what about during the process that happened in 2021? Did you go back to look at what had been rejected by the DOJ in --

A. No, I would have left that to the attorneys.

Q. You completely left that to attorneys?

A. Yes.

Q. You weren't worried that the only alternative to your Map Proposal 2 was a map that resembled the 2011 rejected map?

MR. RUSSO: Objection, calls for speculation. Asked and answered. And misstates prior testimony.

THE WITNESS: I went off the attorneys that we hired to do a constitutionally compliant job. Whether that requires them to go back and review maps that were rejected or not, that's for them to do.

Q. (BY MS. KLEIN) But you didn't take it upon yourself to make sure the county didn't repeat the same mistake it made back in 2011?

A. I did not take it upon myself.

MR. RUSSO: Objection, mischaracterizes prior testimony.

You can answer.

Q. (BY MS. KLEIN) The 2011 process that -- that litigation cost the county money, right?

A. Correct.

Q. And the litigations that were filed -- the first Petteway cases, those also cost the county a pretty penny, right?

A. Cost money, yes.

Q. And one of your platforms, as I understand it, is to, you know, cut taxes for the county, right?

A. Which we've done 12 years in a row.

Q. But adding cost like litigation, that adds to the -- that adds to the county budget, right?

A. It's included in the budget already. And believe me, if I could get people to stop suing us, I would do it.

Q. So you're saying that in light of all that, you never went back to make sure you weren't repeating the same mistakes that you had made in 2011?

MR. RUSSO: Objection, misstates prior testimony.

THE WITNESS: We hire attorneys and we expect them to do their job.

know when they were finalized?

A. No, I don't.

Q. Okay. Do you know if these criteria 1 to 6 are listed in order of priority?

A. Only -- I mean, I would say that No. 1 is the highest priority, make sure they don't do anything that they can't do. Other than that, I haven't -- I haven't seen the others to see if they are or not.

Q. Okay. We'll go through them and then I'll ask you the question at the end.

A. Okay.

Q. So the first factor that you said, (Reading:) Compliance with the requirements under the 14th Amendment to the US Constitution and Voting Rights Act, what was your understanding of the requirements of the Voting Rights Act in adopting the 2021 plan?

A. I wouldn't have one. That's, again, why we're going pay to lawyers to do their job.

Q. So you didn't have an understanding of what the Voting Rights Act would require when you were considering whether to adopt Map 2 or Map 1?

MR. RUSSO: Objection, misstates prior testimony.

THE WITNESS: My understanding is that the Voting Rights Act has changed some. So, no, this is not

something that I keep track of. And this is why we have a lawyer who are well versed in this area of the law.

Q. (BY MS. KLEIN) The second sentence says, (Reading:) In particular, the most important factor in crafting the redistricting lines for the Commissioners Court precincts was the equalization of population and to make the four Commissioners Court precincts geographically sound.

A. Okay.

Q. What does geographically sound mean?

A. As compact as you can get them is how I interpret this. Understanding this is a document from the court, not just from me.

Q. It's from your counsel.

A. Correct. But I think -- well, I believe on behalf of the court, not just me.

Q. Okay.

MR. RUSSO: Court meaning?

THE WITNESS: Commissioner's Court.

Q. (BY MS. KLEIN) Commissioner's Court, yeah.

Okay. The second factor is unified representation on Galveston Island and Bolivar Peninsula.

MS. KLEIN: If we scroll down, Alexa. Just make sure I got that right.

to have been true for the other commissioners?

A. Do not know.

Q. And then the goal was to have -- the last sentence says, (Reading:) There was a sense that the prior map looked gerrymandered.

Do you agree with that statement?

A. I do.

Q. What does "gerrymandered" mean to you?

A. Moving lines in a -- in not necessarily in a sensible manner in order to achieve a specific goal.

Q. And which part of the prior map looked gerrymandered?

A. Precinct 3. And I understand it had to be so...

Q. What do you mean it had to be?

A. My understanding from the 2011 redistricting is we had to make every effort to keep a majority/minority precinct. And the only way we could achieve that was to have the precinct look like it did.

Q. So you knew that by changing things the way you did in Map Proposal 2 you were getting rid of that majority/minority precinct, right?

MR. RUSSO: Objection, calls for speculation.

THE WITNESS: And what I know would have

come to me through one of my lawyers.

MR. RUSSO: Object on the basis of attorney-client privilege. To the extent the conversations she asked about happened with your lawyers, do not disclose it.

Q. (BY MS. KLEIN) Were you aware -- I'm not asking you what your lawyers told you or whether you agreed with it or whether you -- any of those discussions.

But when you chose Map Proposal 2, at that moment in time you were aware, weren't you, that that majority/minority Precinct 3 that you had to keep in 2011 that you were breaking that up between all four remaining precincts, right?

MR. RUSSO: Objection to the extent it calls for a legal conclusion. And same objection related to attorney-client privilege.

THE WITNESS: Yeah, the information would have come from an attorney working on our behalf.

MS. KLEIN: Okay. I'm going -- I'm just going to preserve for the record that I dispute that privilege objection and we're going to reserve the right to call the commissioner back once we get a court determination on it.

MS. RICHARDSON: Petteway will join.

MR. RUSSO: Yeah. I'm sorry. I'm just -- which conversation are you speaking about?

Q. (BY MS. KLEIN) Right before the break I was asking, you know, with respect to your awareness of, you know, racial breakdown by Map Proposal 2 district and your awareness of that.

And you said that you couldn't answer -- if I remember correctly, you said you couldn't answer because it was told to you, whatever you knew was told to you by your attorneys. Do you remember that?

A. Yes.

Q. So which is who, which attorneys is what I'm asking?

MR. RUSSO: You can answer that.

THE WITNESS: Dale Oldham primarily. To a lesser extent Joe Nixon in 2011-2012.

Q. (BY MS. KLEIN) Okay. And Just to clarify the privilege objection and whether or not you're going to answer, so you -- your position is you are not willing to confirm whether you were aware of any of these, you know, racial data or partisan data facts at a later date after learning them from an attorney, correct?

MR. RUSSO: Well, let me just tell you what my objection is. It's not to reveal conversations that he or information he got from the attorney. If he got

EXHIBIT 5

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

HONORABLE TERRY PETTEWAY, et al.	)	
	)	
Plaintiff	)	
	)	
vs.	)	C.A. No. 3:22-cv-00057
	)	
GALVESTON COUNTY, et al.	)	
	)	
Defendants.	)	

ORAL VIDEO CONFERENCE DEPOSITION

ROXY HALL WILLIAMSON

DECEMBER 5, 2022

ORAL VIDEO CONFERENCE DEPOSITION OF ROXY HALL WILLIAMSON, produced as a witness at the instance of the Defendant and duly sworn, was taken in the above-styled and numbered cause on the 5th day of December, 2022, from 10:07 a.m. to 4:16 p.m., before Anne F. Sitka, Certified Shorthand Reporter in and for the State of Texas, reported by computerized stenotype machine at the offices of Burwell Nebout Trial Lawyers, 565 Egret Bay Boulevard, League City, Texas 77573, pursuant to the Federal Rules of Civil Procedure and the provisions stated on the record or attached hereto.

A. No. It was just a flat fellowship rate.

Q. And -- and when you started it, was it under the impression that it was going to last for the one-year term?

A. Yes.

Q. And you referenced the -- the meeting that was held at Pastor King's church. Do you remember that?

A. Yes.

Q. Who was it that organized that meeting?

A. It was actually a combination of community people. It was Miss Lucille McGaskey, myself -- I don't remember her name, but she actually opened up the church for us. She worked for the church. She didn't -- she just handled the facility. We handled coordinating the people.

Q. Whose idea was it to have the meeting in the first place?

A. Mine.

Q. And do you remember approximately when this meeting was held?

A. Hmmm. September, 2021?

Q. And you had said it was held via Zoom?

A. Well, that was in person. That was an in-person meeting at the church.

Q. Was there a computer there that allowed people to

watch remotely?

A. No, no. It was in person.

Q. Do you know if this was recorded?

A. No, it wasn't recorded.

Q. And you mentioned that the Texas Civil Rights Project presented, correct?

A. Well, they had representation there.

Q. Were they the ones -- did they offer -- did they get -- provide a presentation?

A. Not a presentation but they were there to answer any questions that the community had, especially if it was anything dealing with any legalities of what the redistricting looked like.

Q. Did you ask them to come participate in this meeting?

A. Yes I did.

Q. By "them" I mean Texas Civil Rights Project.

A. Yes. Yes.

Q. Were there any type of printed materials that were handed out at the meeting?

A. No, not at that meeting.

Q. Was there any types of PowerPoint presentations that were used?

A. No.

MR. HOLT: Sorry. Just going through my

notes here.

Q. (By Mr. Holt) You had shared that you don't have a good, positive view of Commissioner Armstrong, correct?

MS. RICHARDSON: Objection to form.

A. I don't know if I would say it's not a positive. I don't know him well enough to really have any real opinions on him personally; but what I've seen of him, especially dealing with the community, he's not well known -- he's not known well enough to offer any kind of ad- -- ad- -- advocacy for the community.

Q. (By Mr. Holt) Do you --

A. They know of him, but they don't know him.

Q. Have you ever tried to speak with him?

A. I have not.

Q. Has he done anything that gives you the impression that he does not want to represent the minority voters in Galveston County?

A. He hasn't done anything; so, I haven't seen him do anything in the community at all. So, I don't know how to answer that question.

Q. Do you think it would be fair to give him the opportunity to serve before individuals form opinions on how he will act as a commissioner?

MS. RICHARDSON: Objection to form.

MS. VALL-LLOBERA: Objection to form.

A. Well, I believe since he was appointed as opposed to elected, that would be up to the community how they receive him.

Q. (By Mr. Holt) Okay. And you would agree that Mr. Armstrong identifies as black, correct?

A. I do. And I also know that he identifies as Republican.

Q. Okay. What is it about him being a Republican that made you want to -- to add that?

A. That's just some -- some of -- if I were to say any criticism at all that I've heard from the community, that would be one because his appointment means that there are no -- there's no Democratic representation. And for the people that we're talking about, many of them lean Democratic.

Q. Do you feel that black Republicans somehow betray their community?

A. Not at all. That's part of the history of politics in Galveston. A majority of the population that we're talking about started out as Lincoln Republicans. So, that doesn't make a difference here nor there.

Q. And what is it about Commissioner Armstrong's political ideology that -- that makes you uncomfortable?

A. Me personally? None at all but from the community, it's mainly based on how he responded to the

COVID epidemic.

Q. And he's a doctor, correct?

A. Yes, he is.

Q. Have you ever visited him --

A. No, I haven't.

Q. -- in a medical capacity?

A. No, I haven't.

Q. Now, you had said earlier that -- and I'm paraphrasing here -- that the November meeting was the only time residents could provide comment on the -- the maps. Do you remember saying something rough- -- roughly along those lines?

A. I do.

MS. RICHARDSON: Objection to form.

A. I do. I do.

Q. (By Mr. Holt) But you would agree that the weeks and months prior to this meeting that the public had the ability to comment through a Web site and Facebook, correct?

A. Yes.

Q. So, would you agree that prior to the November meeting there were opportunities for the public to comment on the maps?

A. I would say that there was ample opportunity for them to respond and participate as they saw fit.

Q. Did you know of anyone who attempted to leave a comment on the Web site that was unable to do so?

A. No, but I do know some elderly constituents who did not have access to computers that wanted to participate; and there weren't enough in-person opportunities for them to do that.

Q. Okay. Were they able to attend the in-person meeting?

A. The one in November, yes.

Q. And you mentioned --

A. But there weren't any prior to that that they were able to attend, no.

Q. And you mentioned earlier that everyone who wanted to speak at the November meeting was given an opportunity to speak?

A. If they were on the sign-in list, they were allowed to speak, yes.

Q. So, are you aware of anyone, either at the November meeting or in the prior Internet comment period, that was -- that wanted to leave a comment that was unable to do so?

A. Not that I know of, no.

Q. Okay. Now, Commissioner Holmes is still an elected county commissioner, correct?

A. Yes.

Q. And he won't be up for reelection until the end of 2024, correct?

A. Correct.

Q. Do you know who was going to run to replace him as a commissioner?

A. Have no idea.

Q. Do you know if that individual who will run will or will not represent the interests of the minority community in Galveston County?

A. I would hope that they would. However, I think that's contingent on how the maps are laid out who would be eligible or who would step up into that space to run.

Q. So, you would -- would you agree that at this stage it's too early to know exactly who's going to be there come January of 2025 and what their relationship with the minority community will be?

MS. RICHARDSON: Objection to form.

A. Hmmm. Interesting. I could agree to that. It would be too hard to know at this point.

Q. (By Mr. Holt) You would agree that there are many differences between the Republican party and the Democratic party, correct?

A. Today --

MR. GEAR: Objection, form.

A. Today, yes.

THE WITNESS: Oh, sorry.

A. Today, yes.

Q. (By Mr. Holt) What are some of those differences?

A. Hmmm. That's a good question. I don't know if I can name them all right here, but what stands out in my mind right now is just the -- how constituents feel they are able to be represented by either party.

Q. Okay. You would agree they would have different tax policies, for example?

A. I can agree there are some policy differences, yes.

Q. Different strategies regarding foreign policy, correct?

A. Yes.

Q. Or different social policies, correct?

A. Correct.

Q. You would agree that there are many reasons -- many different reasons by -- why someone would identify themselves as a Republican or a Democrat, correct?

A. Correct.

Q. And would you also agree that it's -- there's never -- there's not one, single issue that can easily explain one political ideology versus the other?

A. I can agree with that.

Q. But it's complicated to explain why someone is a

Democrat versus a Republican?

A. I can agree with that.

Q. Okay. So, do you think it's a fair assessment to make blanket statements regarding either political party on what they do -- what those members of that party do or do not believe?

A. I can agree.

MR. GEAR: Objection to form.

Q. (By Mr. Holt) You doing okay?

A. I am.

Q. So, I'm going to jump into some documents here; and I'll do my best for those on Zoom to e-mail these out as we discuss them.

MR. HOLT: So, I think we are on 3? Is that correct?

THE REPORTER: Yes.

(Exhibit 3 marked)

MR. HOLT: And some of these I have enough copies; some of them I don't. I apologize. But I will e-mail this out right now. Just respond to Sarah's e-mail. Sorry, guys. Give me a sec. Okay. I just e-mailed that out to everyone on Zoom. Okay.

Q. (By Mr. Holt) Okay, Roxy. Do you recognize what this is?

A. I recognize the e-mail.

Q. It is an e-mail from you to various individuals; is that correct?

A. Correct.

Q. It looks like you sent it on Thursday, November 4th, 2021; is that correct?

A. Correct.

Q. Now, I want to go through -- sorry. This might be kind of tedious, but I want to try to understand who those individuals are that you e-mailed this to. Okay?

A. Okay.

Q. And so, to the extent you know, wonderful. To the extent you don't know, I'm not asking you to try to divine what someone's e-mail is from an e-mail back in 2021.

So, who is Ruth12340992?

A. I do not remember.

Q. Okay. What about musemm@sbcglobal.net?

A. I do not know.

Q. Okay. What about bjrice@academicplanet.com?

A. I don't remember.

Q. Stholmes1@aol.com?

A. That would be Stephen Holmes.

Q. Is that his personal e-mail address?

A. I believe it is.

Q. Okay. And then following that, it says Holmes,

Stephen. Would that -- would that have populated as his official e-mail address?

A. Yes, it would have.

Q. And then the next one is sharonlewis@GalvestonTX.gov.

A. Yes, that's city councilwoman Sheryl -- Sharon Lewis.

Q. Okay. And going on to the carbon copy folks here, kimjyancy@gmail.com?

A. Yes. That would be city councilwoman Yancy in La Marque.

Q. And that's her personal e-mail address?

A. It is.

Q. Jonathan Warren?

A. A community member.

Q. Do you often work with Mr. Warren?

A. On some other community efforts, I do.

Q. And what type of activities do you engage with Mr. Warren?

A. He works a lot with the youth in Nia cultural center in Galveston.

Q. Okay. What does he do professionally?

A. I'm not exactly sure. I know that he works with the youth. That's all I know.

Q. Okay. Did you engage with him regularly on

redistricting for Galveston County for the 2021 cycle?

A. He was one of the people that were int- -- that was interested in the process in order to explain it to some of his students and their parents.

Q. Okay. Now, going on the next one, djjohnson_76@yahoo.com, do you remember who that is?

A. I can't remember right off the top of my head, no.

Q. Patriciatoliver67@gmail.com, do you know who that is?

A. I do. Patricia Toliver, she is one of the nurses in the Gulf Coast -- Galveston County Gulf Coast Black Nurses Association.

Q. Forgive me. I said "Patricia T. Oliver." You just said her hame is Patricia Toliver?

A. Toliver. It is.

Q. Okay. Excellent.

And you do you speak with her often regarding redistricting in Galveston County?

A. I did.

Q. The next one is lmcgrewl@sbcglobal. Who is that?

A. Yes. That would be Lillian McGrew. She's another black nurse.

Q. Okay. And then shawnp?

A. That's actually a friend of mine, Miss Shawn

Patton Mitchell, just a community member, interested community member.

Q. Okay. Brittneywalker@live.com?

A. Brittney is a part of my sorority, Alpha Kappa Alpha Sorority, Incorporated; and she was on one of our committees, our political action committees in the sorority.

Q. Okay. Do you engage with her often about redistricting in Galveston County?

A. Not often. Another individual that was interested in the process, in assisting me in disseminating information to the sorority about the process.

Q. Going on, the next one there is jreneaka24@gmail.com?

A. Another sorority member.

Q. Okay. And Janice Matthews?

A. Janice Matthews is actually the grand lady of my ladies auxiliary group at church and another interested community member.

Q. Okay. And what church is that at?

A. Holy Rosary Catholic Church.

Q. Okay. And lillian@hotmail.com?

A. I'm not sure which Lillian that would be.

Q. That's a great e-mail address. She got in early

on Hotmail.

J.compian@gmail.com?

A. Joe Compian.

Q. Who is Joe?

A. He is actually -- he was -- he is or was a city council member with La Marque as well, Hispanic and a part of Lulac I believe.

Q. Did you speak with him often about redistricting in 2021?

A. Not often but a couple of times. He was one of the people that I reached out to to help us bridge the gap with the Hispanic community to get their input for the maps.

Q. So, ins- -- aside from including him as a carbon copy on e-mails, do you recall any times you spoke with him or engaged with him?

A. I spoke with him in person at a Tejano Democrats meeting once during that era, during that time.

Q. Okay. Any other times?

A. No.

Q. Okay. The next one is lthierry@utmb.edu?

A. Mr. Hank Thierry.

Q. Okay. Who is Mr. Hank?

A. He's a member of the Alpha Phi Alpha fraternity in the area and another concerned citizen that was helping

with disseminating information.

Q. Okay. And then Ian C. Barrett?

A. I can't remember who that is.

Q. Okay. Lawanda Ward?

A. Miss Ward, yes. She -- community member, coordinates Juneteenth in her "Ujamaa," "Ujamaa" festival that she has during the fall. Community member as well.

Q. And you spoke about Ms. Ward earlier in the deposition today, correct?

A. Yes.

Q. And this is that same --

A. That's the same Miss Ward, yes.

Q. Okay. And Corlie Jackson?

A. Yes. Miss Jackson, good friends, community member, knows a lot of the history of Galveston. She and her husband used to do a lot of work with St. Vincent's House. She's very active in the community, very involved in the process.

Q. Okay. And then riversgalveston@gmail.com?

A. That would be Miss Connie Rivers, who is currently the president of the Galveston Island Democrats.

Q. Okay. And do you engage with her often in your work as a fellow?

A. Not as often as I would have liked to. She's another one that is rich with information about Galveston

and Galveston County, but she was one of the people that were -- was interested in the redistricting process.

Q. Okay. Then mcafee.manessa1 -- vanessa1?

A. Vanessa McAfee, yes. She's another one, used to be a part of the county Democratic party, very involved with voter registration, was very interested in the redistricting process.

Q. Okay. And I'm looking here at whking --

A. That would be Pastor William King whose church I mentioned earlier.

Q. Got it.

Then keith@henryactiontoday?

A. That would be Mr. Keith Henry who just recently ran for office, the House District 23 seat that Miss Terry Wilson just won [sic].

Q. Okay. Did you work on his campaign?

A. I did not work on his campaign, but he was another point of contact with whom -- contacting the community members in Precinct 3, and he did a lot of work with helping with mobilizing that community as well.

Q. Okay. And I apologize for the redundancy on this. It will be --

A. No worries.

Q. We won't do this on everything.

Looks like pdrjvj@aol.com?

A. And actually that is Miss Deborah Jones, ex-schoolteacher, very involved in the community, very knowledgable community member as well; and I believe she lives in the precinct in question.

Q. Then Henry Keith, is that just a second --

A. That's just a --

Q. -- e-mail?

A. -- second e-mail for him, yes.

Q. And then Heidi Gordon?

A. Heidi Gordon used to be a president of the Texas Democratic Women of Galveston County, another concerned citizen and very active in the community.

Q. And then ibc@gitx@gmail?

A. I don't remember. Oh, yes, I do. If I'm correct, that is Mr. Ken McPherson, another community activist.

Q. Okay. Brandon Williams?

A. Brandon Williams and Jonathan Warren used to work together. And I'm not exactly sure what they each do with the youth, but they work extensively with the youth in Galveston.

Q. Okay. Jesse Gaines?

A. Mr. Gaines is NAACP, one of the officers with the Texas state NAACP.

Q. Stephanie Swanson?

A. League of Women Voters.

Q. And then Hilary Harris Klein?

A. One of the attorneys for the Southern Coalition for Social Justice.

Q. How did you become associated with Ms. Klein?

A. She is -- was on my coalition team with my fellowship.

Q. And regarding your 2021 redistricting work, did you often communicate with Ms. Klein?

A. I did.

Q. Was she a supervisor?

A. No, just a team member.

Q. Okay. Is there -- what do you recall about those conversations with Ms. Klein?

A. Not a lot. Again, she was a part of the legal counsel. So, we had a little communication but not a lot just one-on-one with me and her. It was typically with the team at large.

Q. Okay. Did she help organize the meeting at Pastor King's church?

A. No, she didn't help organize that.

Q. Was she there? Was she present at the meeting?

A. She wasn't present, no.

Q. Okay. And then Candela Cerpa?

A. She is one of the trainers with the Southern

Coalition for Social Justice. She was one of the redistricting trainers.

Q. Okay. Now, just a few more names; and then we'll get into some more substance here. I want to go through some of the plaintiffs in this litigation, and just let me know if you know them. We'll kind of explore your relationship with them.

A. Okay.

Q. Terry Petteway, do you know who Terry Petteway is?

A. I've only met the Petteways a couple of times.

Q. What comes --

A. I don't know them well.

Q. And what comes to mind when you think of -- when you hear "Terry Petteway"?

A. We've done some Democratic work together.

Q. Are they -- are the Petteways active in the Democratic party?

MS. RICHARDSON: Object to form.

A. As far as I know, they were.

Q. (By Mr. Holt) Is there any reason they still wouldn't be?

A. I would have no idea. I don't know them personally that way.

Q. Okay. How about Derreck Rose?

A. Derreck Rose is a constable in Galveston County.

Q. Do you -- have you communicated with Mr. Rose?

A. Not specifically about redistricting but we have worked together. I used to be a part of the black coalition that he was a part of.

Q. Okay. And as far as you know, is he a member of the Democratic party?

A. As far as I know? I don't really know.

Q. Okay. A Michael Montez?

A. I don't know that name.

Q. Penny Pope?

A. I know Ms. Pope; but that's a family connection, not necessarily anything dealing with the redistricting work.

Q. You never had a conversation with her regarding the 2021 redistricting in --

A. Not with her --

Q. -- Galveston County?

A. -- personally, no.

Q. Okay. All I would ask is -- I know you can probably anticipate what I'm going to say in my questions, but if you would just -- it's easier for the court reporter if we don't talk over each other. I will do my best to not talk over you. I think she'll just be grateful for that.

How about Sonny James? Do you know Sonny James?

A. I don't.

Q. A Roosevelt Henderson?

A. I don't.

Q. Okay. And are you involved with the Dickinson-Bay Area Branch of the NAACP?

A. I've visited them a few times, yes.

Q. Okay. How about the Galveston branch of the NAACP?

A. I'm a member.

Q. And the Mainland branch of the NAACP?

A. I know of them, but I don't know any of them.

Q. How do these different branches coordinate their work one with another?

A. That, I couldn't tell you because I don't -- I don't work between the branches. I visited the Dickinson one before I became a member of the one in Galveston. That's as much as I know.

MS. RICHARDSON: Mr. Holt, I just want to put on -- just to clarify the record: Roosevelt Henderson isn't a party to the current complaint as he died before the filing of this current complaint.

MR. HOLT: Understood.

MS. RICHARDSON: Yeah.

MR. HOLT: Thank you.
The Court has him listed as a plaintiff --
MS. RICHARDSON: Yeah. It's clear they haven't --
MR. HOLT: -- in the new litigation but --
MS. RICHARDSON: They didn't remove his name. Yeah.
MR. HOLT: -- yeah. Anyway, yeah. Thank for that clarification.
MS. RICHARDSON: Yeah.

Q. (By Mr. Holt) How about Edna Courville?
A. I don't know Miss Courville.
Q. And Joe Compian, you had mentioned he was on this --
A. Yes.
Q. -- e-mail?
A. Yes.
Q. Again, how often did you -- do you communicate with Joe?
A. Not very often. Again, he was one of the people that it was advised that I contact if I wanted to get more information about the Hispanic community and how we could get them involved in the redistricting process.
Q. Who advised you to contact Joe?
A. My mother did actually. She used to work with

him on the Interfaith Council some years ago.

Q. Okay. Did you ever speak with Joe about this litigation?

A. No. Not the litigation, no.

Q. Leon Phillips?

A. I know Mr. Phillips, yes.

Q. In what capacity do you know Mr. Phillips?

A. Community activism.

Q. Have you worked with him directly on redistricting in --

A. No.

Q. -- Galveston County?

A. Not directly. We spoke a couple times about the city redistricting but not the county redistricting.

Q. What -- what did he speak to regarding the city redistricting?

A. We had spoke specifically about District 1, Councilwoman Lewis' district, and just making sure that they understood what redistricting was and how the process worked.

Q. So, you helped educate Mr. Phillips?

A. I did.

Q. Okay. And what interactions have you had with the U.S. Department of Justice regarding redistricting in Galveston?

A. Other than speaking with Mr. Gear and his colleagues, that's all.

Q. How many times did you speak with Mr. Gear?

A. A few times?

Q. Who was it that initiated --

A. Once in person.

Q. -- that?

Who was it that initiated that conversation?

A. He did.

Q. How did he first reach out to you?

A. E-mail.

Q. Do you know how he got your e-mail?

A. Probably from my complaint that I sent in, and I wouldn't be surprised if he spoke to other community members that my name came up.

Q. So, prior to submitting your complaint, had you ever communicated with the Department of Justice regarding redistricting?

A. No.

Q. In your conversations with Mr. Gear, did he discuss any potential future ligation surrounding the maps in Galveston?

A. No, our first interview was just talking to me about what I knew about the process and what I knew about Galveston.

Q. And then did he follow up again with you?

A. We met when he was here in person. I interviewed with him by myself. And then I was able to take part in another meeting, but it was not just myself. It was me and some other community members.

Q. But approximately when was Mr. Gear in Galveston?

A. Oh, I don't remember. It was -- I don't remember. I'd have to look at my calendar. I don't remember.

Q. Do you remember --

A. I would have to look it up.

Q. Do you remember if anyone else came with him from the Department of Justice?

A. He had another attorney with him, I believe, yes.

Q. Okay. Do you know -- did they record your conversations?

A. I'm not sure.

Q. Approximately how long was the conversation that you had with them?

A. About an hour.

Q. Did he give you any representations of why it was that he was in Galveston?

A. Well, I know it was primarily from the complaints that several of us had lodged; and he was doing his due diligence.

Q. Okay. Did he say what he was going to do with the information that you provided him?

A. Not to me, no.

Q. Did he say to somebody else?

A. I wouldn't know. I don't know.

Q. Approximately how many people do you know -- do you know -- strike that.

Do you know how many people he met with when he visited here?

A. I have no idea.

Q. Do you know how many days he was in Galveston?

A. A few.

Q. Two or three?

A. Maybe three.

Q. Okay. Are you doing okay? You want to keep going?

A. Yeah.

Q. Okay. Just let me know when you need to take a break.

Okay. I want to go back to Exhibit 3. Do you still have that in front of you?

A. I do.

Q. At the top of the e-mail in the text -- the text of the body, it says "the Galveston city council redistricting workshop." Do you see that?

A. I do.

Q. What is -- what was the Galveston city council redistricting workshop?

A. City council was doing their own city redistricting at the time as well.

Q. Okay. So, this was a -- a meeting hosted by the Galveston city council?

A. It was. I was sharing the link.

Q. Okay. Did you participate in this video -- I mean in this training?

A. I want to say that I did while I'm watching Zoom.

Q. Okay. Now, as you go lower in the e-mail, looks like this was -- you were doing a "reply all" earlier to and earlier e-mail where it says "Good afternoon, Galveston County." Do you see that?

A. Uh-huh. I do.

Q. Okay. And then the first asterisk there, it says: For those of you prepared to sign onto the advocacy letter, please forward your logos and signatories to me or Steph Swanson. Do you see that?

A. I do.

Q. What is this advocacy letter that you refer to in here?

A. We were preparing ourselves -- me mainly and the community members that I was working with at the time --

to possibly do a sign-on to a letter stating our -- how do I -- how do I put that -- stating our support of getting a map that was -- how did I say the -- a community map that was agreed to by the community to be advocated for as we were preparing for the next -- whenever this next meeting was supposed to come about -- for us to have our public comment and possibly build a map that we could possibly present as well as the letter with all the different groups -- League of Women Voters, NAACP, the other organizations that we were working with -- to advocate for a good map to present.

Q. Okay. And then you say at the end of that, first asterisk: This assists with establishing important information for litigation if necessary. Do you see that?

A. I do.

Q. What did you mean by that?

A. At this point we had been told that there was a possibility that everything that we did in the meeting may not come out as we were hoping and if not that there was a possibility to have the community members advocate and possibly fight the maps that were eventually approved.

Q. Who had told you those things?

THE WITNESS: (Coughing.) Excuse me.

A. Well, within my coalition they had talked about if the maps -- if it came down to it, the maps would have

to be -- would have to go to court, that the community would have to be prepared to advocate if it were possible that we go to court behind the maps.

Q. (By Mr. Holt) Do you know who specifically was telling you those things?

A. Not specifically but I know that it was a part of the training that we were doing with the fellowship; and that's why we were working on community-based things, to prepare the community to fight for a map if they didn't like the ones that were being presented.

Q. Okay. In this group that we went through on the two on the cc lines on this e-mail, aside from Ms. Klein is there another attorney that was part of this -- your e-mail group?

A. No. No, not this particular group. No.

Q. Was Ms. Klein --

A. Well, Mr. Gaines is an attorney with the NAACP. He is an attorney by trade, but I don't believe that was the capacity that he was in in this particular e-mail.

Q. Okay. Was Ms. Klein asking you to help gather information that would be important for litigation?

A. I don't believe it was her specifically. Again, I want to say it just came from our coalition group that we were talking in generals [sic] about, you know, how would we prepare the community moving forward.

Q. Are you an attorney?

A. I am not.

Q. How do you know what important information is needed for litigation?

A. Well, basically it was whatever Steph Swanson was having me and Bindu work on at the time.

Q. Do you know who Steph Swanson was working with regard -- in regards to potential future litigation?

A. Well, other than Ms. Klein here, Ms. Sarah Chen and whoever they were talking to with her group of League of Women Voters, I couldn't tell you specifically who those people were.

Q. So, is it safe to say that at least a week prior to voting on the maps that there was already talk about preparing for litigation?

MS. RICHARDSON: Objection, form.

MS. VALL-LLOBERA: Objection, privilege.

A. It wasn't --

MS. VALL-LLOBERA: And if you could, actually pause --

THE WITNESS: Okay.

MS. VALL-LLOBERA: -- before answering.

But object to privilege, too, and to the sidebar.

MR. HOLT: I don't think you guys represent

her, then any communication you had with her would be -- would have been waived from your organizations.

MS. VALL-LLOBERA: There --

MS. CHEN: We'll -- we'll save that objection for when -- for anything that he addresses to the clients.

MS. PRATHER: Could you --

MR. HOLT: Are we okay?

MS. RICHARDSON: -- repeat the question.

THE WITNESS: Thank you. I was going to ask that.

MS. RICHARDSON: If you can, pause for a second before you answer.

MR. HOLT: Can you read back, please? It got a little intense there for a sec.

THE REPORTER: "QUESTION: Is it safe to say that at least a week prior to voting on the maps that there was already talk about preparing for litigation?"

MS. CHEN: Objection, form.

MS. RICHARDSON: Objection to form.

MR. GEAR: Objection, form.

MR. HOLT: Anybody else?

MS. VALL-LLOBERA: Objecting based on privilege.

MR. HOLT: I assume --

THE WITNESS: Do I answer it?
MR. HOLT: Yeah.
MS. CHEN: For now we'll instruct you not to answer.
And can we ask for a quick recess?
MR. HOLT: Yeah, but she's not your client at all. I don't -- you can't really instruct her not to answer. You don't have privilege with her. That's what I don't understand here.
MS. CHEN: Let's --
MR. HOLT: We can talk. We can -- if we want to have any type of substantive discussion, I'd prefer that we have it on the record regarding privilege.
MS. PRATHER: Well, since there is a question about privilege, then I instruct you not to answer the question; and we'll let the Court decide -- resolve whether that -- the privilege communication should prevent her from answering this question.
MR. HOLT: I'd just like to know the legal basis for the privilege objection.
MS. VALL-LLOBERA: She was a contractor with the NAACP.
MR. HOLT: She was a contractor with the NAACP?
MS. VALL-LLOBERA: And you're asking about

potential litigation conversations between her and her coalition, which includes the NAACP, during a time which she was employed by them.

Q. (By Mr. Holt) Okay. Aside from any conversations you had with the NAACP --

MS. PRATHER: Or her attorney.

Q. (By Mr. Holt) -- or your attorney or -- were you aware of any efforts to prepare for litigation?

MS. PRATHER: Objection, form.

MS. RICHARDSON: I'll also object to form.

MR. HOLT: I'm just -- I mean, she talks about preparing for litigation in this e-mail that she clearly sent to members that were not part of the NAACP. I'm just trying to explore what it is she's saying in this communication where she brings up litigation where there are many people that are not covered by NAACP's privilege.

MS. CHEN: You were asking about other communications, not this one involving litigation.

MR. HOLT: Okay.

Q. (By Mr. Holt) The litigation that is referenced in your e-mail, what type of litigation are you preparing -- that you reference in Exhibit 3?

A. And from my point of view and from this e-mail, I didn't have any idea what kind of litigation. All I knew was if litigation were to become necessary that my job was

to help the community get themselves together in order to be prepared for whatever was coming down the line.

Q. Okay. Your second asterisk here, you say: The Honorable Commissioner Stephen Holmes will be speaking on redistricting this evening.

Do you see that?

A. I do.

Q. Did you attend that meeting?

A. I did not actually. It wasn't a meeting that I coordinated. I want to say that was something that was done by the county chair, and she asked that I share the information.

Q. Was this a Zoom meeting?

A. I want to say it was a Zoom meeting.

Q. Do you know if anyone recorded this meeting?

A. I don't know.

Q. Who was it that set it up? You said the Democratic party chair?

A. I think Tierr'ishia Gibson set up that meeting.

Q. Okay. Who was it that arranged for Commissioner Holmes to speak at the meeting? Do you have that information?

A. I don't. All I know is I received the information from Tierr'ishia Gibson.

Q. If you turn to the next page, it says "talking

points on map proposals." Do you see that?

A. I do.

Q. And then it has a link to where you can comment, to submit public comments. Do you see that there?

A. Yes.

Q. Are you aware of anyone that clicked on this link that was unable to leave a comment that wanted to?

A. I don't know.

Q. Who wrote these talking points?

A. I want to say that Miss Swanson composed them. I shared them.

Q. Were you involved in the drafting of these at all, editing or commenting on them?

A. No. I just shared the information.

Q. Okay. Do you know if Commissioner Holmes gave input on these talking points?

A. I don't remember.

Q. Do you believe that a black Republican running for office in Galveston County supports the interests of the black community?

MS. RICHARDSON: Object to form.

MS. VALL-LLOBERA: Object to form.

MR. GEAR: Objection, form.

Q. (By Mr. Holt) Let me rephrase that: Is it possible that a black Republican running for office in

Galveston County could support the interests of the black community in Galveston?

MS. RICHARDSON: Object to form.

MR. GEAR: Objection, form.

A. I suppose anything's possible.

Q. (By Mr. Holt) Okay. What about Hispanic Republicans?

MS. RICHARDSON: Object to form.

Q. (By Mr. Holt) Latino Republicans?

MR. GEAR: Objection.

A. Again, I suppose any of it is possible. Whether it's likely or not, I don't know.

Q. (By Mr. Holt) Okay.

(Exhibit 4 marked)

MR. HOLT: Now, pass out another exhibit here. This is Exhibit 4. I apologize. I didn't print off as many copies of this one. I can send it out on an e-mail here.

THE WITNESS: Okay. This was the meeting here.

MR. HOLT: Give me just a second here.

Okay. Just sent that out.

Q. (By Mr. Holt) Do you recognize what this is?

A. I do.

Q. What is it?

A. It was the notice about the meeting that I was e-mailing about. That was -- that was the asterisk, No. 2.

Q. Okay. So, this is the Commissioner Holmes meeting?

A. Uh-huh.

Q. And you did not --

A. Yes.

Q. You did not attend this meeting?

A. I did not.

Q. So, are you aware of what Commissioner Holmes said at that meeting? Was it ever communicated to you?

MS. VALL-LLOBERA: Objection, form.

A. I can't speak on what he said specifically, no.

MS. RICHARDSON: I'm sorry. I'm doing this a little late, but I'm also going to object to the lack of foundation to this exhibit. I'm not sure what we -- if we laid the foundation about what this is or who it came from.

Q. (By Mr. Holt) Would you agree that this message was attached to the exhibit we marked as Exhibit 3?

A. This looks more like a text message between me and Heidi. It wasn't attached to this original e-mail, no.

Q. Okay. But this is the meeting that you were

referencing, Exhibit 3?

A. But -- right. I did make a reference to it under Asterisk 2. That was the meeting that I was asked to share the information about in the e-mail.

Q. Looking back at Exhibit 3 on the e-mail that was sent at 3:08 p.m. on November 4th -- do you see that?

A. Yes.

Q. -- was this attached to that e-mail?

A. This document?

Q. Yes.

A. Again, it appears to me to be a text message, not an e-mail.

Q. So, a screen shot of a text message, correct?

A. A screen shot of a text message, yes.

Q. Okay. And you don't recall attaching it to --

A. No.

Q. -- the e-mail on November 4th at 3:08 p.m.?

A. No.

MS. RICHARDSON: Okay. I'm going to maintain my objection for lack of foundation to this exhibit.

A. Yeah. No, it's not a part of that original e-mail.

MR. HOLT: Okay. We got one more here. Marking this as Exhibit 5.

(Exhibit 5 marked)

MR. HOLT: I'll e-mail this one out here. Just give me one second.

Q. (By Mr. Holt) Do you recognize what the e-mail is?

A. Yes.

Q. What is it?

A. It is one of my attempts to get information to and from the community about redistricting.

Q. Is this in reference to the redistricting in Galveston County or a different redistricting?

A. Actually this seems to refer to the Texas legislative process. I want to say this is another special session called, and we were getting ready to submit redistricting testimony.

Q. Okay. And you said --

A. Not just for Galveston County but for the process in general.

Q. Okay. And did you send this e-mail?

A. I did.

Q. And you would agree that Stephen Holmes is cc'd on this e-mail, correct?

A. Yes.

Q. So, you would agree that as early as September 11th, 2021, you had communications with

Commissioner Holmes regarding redistricting in Texas?

A. Well, I wasn't directly speaking with him, though I did cc him on all of my communications as I was working through the community so he would be aware of what I was doing.

Q. Okay. Okay.

MR. HOLT: Let's move on to another one here. I'll mark this one as Exhibit 6.

(Exhibit 6 marked)

MR. HOLT: I'll e-mail this out. Just give me a moment.

And for those on Zoom, I may or may not have attached the wrong e-mail to the last one; but there's two September 11th e-mails. So, I apologize. So, the one that I'm sending out now is another September 11th e-mail. I apologize.

Q. (By Mr. Holt) Okay. Do you recognize the e-mail that has been given to you marked as Exhibit 6?

A. I do.

Q. And what is it?

A. It is me requesting information about the redistricting, the city council discussions on redistricting and any open hearings and dates and locations for redistricting.

Q. Okay. So, let's first look at the forwarded

message that was sent on Saturday, September 11th, at 3:22 p.m. Do you see that?

A. I do.

Q. And this looks like an e-mail that you sent to citymanager@GalvestonTX.gov and Mbarnett@GalvestonTX.gov. Do you --

A. Yes.

Q. Do you agree with that?

A. Yes.

Q. Do you remember sending this e-mail?

A. I do.

Q. What is it that you're specifically requesting from the County?

A. I'm requesting, No. 1, city council discussions about redistricting; No. 2, open hearings, dates and locations for redistricting. And I say, "We hope to encourage the community in this important discussion. Will there be any opportunity for Zoom testimony given the enormously high COVID rates we are experiencing?"

And I'm thanking them for any information, guidance and updates.

Q. Okay. And then in -- approximately two minutes after this e-mail was sent, you forwarded it to Commissioner Holmes, correct?

A. I did.

Q. And it looks like this is sent to Holmes, Stephen; and based on Exhibit 3, you had stated that was his official e-mail address.

A. Yes.

Q. Do you remember that?

A. Yes.

Q. Okay. So, you would agree that you sent this to Commissioner Holmes officially --

A. To his office, yes.

Q. When did you send something -- was there -- when would you send something to his personal e-mail address versus his official e-mail address?

A. Hmmm. I would make no distinction. I just -- however it populated in my -- as I was sending e-mails is where I sent it. I didn't make any real distinction about that.

Q. Okay. And you said to Commissioner Holmes, "Thank you for any information you can provide."

A. Right. I was requesting information from all of those entities in the e-mail.

Q. Had you communicated with him in person or over the telephone that this was coming before you forwarded it to him?

A. No. I want to say I might have spoken to his secretary. I did most of my communications with her as

far as trying to get any information; or if I needed to contact him or pass him a message from the coalition, I would go through his secretary.

Q. Okay. So, you would agree that at least, you know, as early as September 11th, 2021, you were communicating with Commissioner Holmes regarding --

A. I was gathering --

Q. -- redis- --

A. -- information from him and whoever would give me information, yes.

Q. Okay. And you just had stated earlier that the first time you spoke with Commissioner Holmes about redistricting was the week before the --

A. That I spoke --

Q. -- the public meeting?

A. -- with him personally, yes; but I had been trying to work with everyone I could work with to get the information, yes.

Q. How long before the November, 2021, meeting had you been communicating with Commissioner Holmes through e-mail?

A. I want to say maybe since that July, August -- probably that August.

Q. Okay. And was -- did he provide you any helpful information?

A. No, because as I mentioned before, most of the information that he could give me, we were all getting it about the same time, his office along with my coalition. He wasn't -- he wasn't any help as far as having any information coming straight for the commissioners court, no. I was not able to get that information.

Q. Okay. And prior to the November special meeting, were you aware of any time where Commissioner Holmes attempted to place the topic of Galveston County redistricting on the agenda for a commiss- -- county commission meeting?

A. I'm not sure about that.

Q. Have you ever --

A. I know that we had asked him to, but I'm not sure.

Q. Do you know if that ever happened?

A. If he -- I'm not sure how that would have worked out.

Q. What did you --

A. I would have to go back and look at my notes from meetings.

Q. When did you ask him to do that?

A. Probably about August before I started really gathering the information that I needed for my work that I was doing with the Maptitude and my coalition.

Q. And you mentioned you also get alerts for meetings for Galveston County.

A. Uh-huh.

Q. Were you aware of any meeting --

A. Yeah.

Q. -- prior to the November, 2021, meeting where redistricting was discussed?

A. No. That would be the purpose for this e-mail because I was still trying to get information about a timeline or how they were going about setting up the meetings for those discussions.

Q. So, you would agree that Commissioner Holmes did not put redistricting on an agenda for the Galveston County meeting?

A. I don't know --

MS. VALL-LLOBERA: Objection, form.

A. -- if I can agree to that.

MR. GEAR: Objection, form.

A. I don't know if I can agree to that because I know that, again, he was one voice against four others; so, him attempting to do it in -- whether it made the agenda or not, I couldn't speak on any of that.

Q. (By Mr. Holt) Okay.

MR. HOLT: Okay. We'll move on to what I'm marking as Exhibit 7.

Q. (By Mr. Holt) You doing okay, Ms. Williamson?
A. I'm good. Thank you.
(Exhibit 7 marked)
MS. RICHARDSON: I might actually need a break soon.
(Discussion off the written record)
THE VIDEOGRAPHER: Off the record at 2:49.
(Recess taken)
THE VIDEOGRAPHER: Back on the record at 3:09.
Q. (By Mr. Holt) While we were on break, Ms. Williamson, did you speak with anyone besides your attorney about your deposition?
A. No.
Q. I'm going to hand you what's been marked as Exhibit 7.
MR. HOLT: I've sent that out to e-mail already. Oh, sorry, guys. There's two pages to this. I think I handed you the second page. Did I?
MS. RICHARDSON: You handed us this.
MR. HOLT: There's that back, page 2 of it; so. There you go.
Q. (By Mr. Holt) Okay. Do you recognize what has been marked at Exhibit 7?
A. The one page? Yeah.

MR. HOLT: My apologies. I thought I had stapled everything together. Okay. I think everyone's got it now.

Q. (By Mr. Holt) Do you recognize what's been marked as Exhibit 7?

A. I do.

Q. What is that?

A. An invitation to the Zoom meeting.

Q. And what is that Zoom meeting?

A. Not saying much.

Q. Do you remember? It looks like Stephanie Swanson scheduled a Zoom meeting regarding Galveston County. Is that what -- is that what it says there?

A. Yes.

Q. And this is an e-mail that you received from Stephanie Swanson?

A. Yes.

Q. And then you just a few minutes after receiving this e-mail from Ms. Swanson forwarded it to Commissioner Holmes, correct?

A. Yes.

Q. Why -- do you remember why you forwarded it to Commissioner Holmes?

A. I don't remember other than -- I don't remember.

Q. And do you remember attending this meeting?

A. I do.

Q. Do you remember what was said there or who spoke?

A. I don't. I want to -- I don't. I know that Miss Swanson was talking about what we were -- the work we were doing here, but I don't remember specifics.

Q. Did Miss Swanson typically record her Zoom meetings?

A. Hmmm. Maybe? I'm not sure about this one.

Q. Would they ever -- Miss Swanson ever circulate a recording of a meeting or a training after the fact for those people who are not able to attend it live?

A. Sometimes --

Q. And you don't --

A. -- yes.

Q. -- you don't -- do you recall if it was done for this meeting?

A. I don't. I would need more context.

Q. Did you ever receive any of those recorded meetings that you were unable to attend --

A. Occasionally.

Q. -- regarding redistricting in Galveston County?

A. Not necessarily redistricting but different trainings, yes.

Q. Okay. And you don't remember why you forwarded this to Commissioner Holmes?

A. I don't.

Q. But you agree that you did, correct?

A. I did.

(Exhibit 8 marked)

Q. (By Mr. Holt) Okay. I'm going to hand you what's marked as Exhibit 8.

MR. HOLT: Let me get this circulated real fast. Okay. I just sent that out through e-mail.

Okay. Sorry.

MS. RICHARDSON: It's all right.

MR. HOLT: Did it again.

MS. RICHARDSON: Oh, that makes more sense now.

MR. HOLT: Mind if I see that back there? I'm sorry. There's a second page. When I printed it, it looks like it -- someone unchecked the box here.

There you go, ma'am.

MS. VALL-LLOBERA: Thank you.

Q. (By Mr. Holt) Okay. Do you recognize this, Ms. Williamson?

A. I do.

Q. What is it?

A. It is an e-mail where we -- hmmm. Give me a minute.

This looks like it has to do with the ad- --

advocacy groups we were trying to get together for -- oh -- the ad- -- advocacy letter we were sending to the commissioners court.

Q. Let's look at this, the first e-mail underneath the forwarded message. Do you see that?

A. Uh-huh.

Q. And it's an e-mail from Stephanie Swanson to yourself and Sarah Chen. Do you see that?

A. I do.

Q. And do you believe this to be the Sarah Chen that's sitting with us today at this -- at the deposition?

A. I do.

Q. Okay. Did you engage with Ms. Chen often regarding redistricting of Galveston County?

MS. VALL-LLOBERA: Objection, privilege.

MR. HOLT: Is the Texas Civil Rights Project the same as NAACP?

MS. VALL-LLOBERA: The NAACP is a client.

MR. HOLT: Okay. Help me understand here. So, NAACP is a client of --

MS. VALL-LLOBERA: The Texas Civil Rights Project.

MR. HOLT: The Texas Civil Rights Project? And you're claiming that -- that --

MS. VALL-LLOBERA: Ms. Williamson --

MR. HOLT: -- that therefore makes communications with Ms. Williams -- Ms. Williamson privileged?

MS. VALL-LLOBERA: Yes.

MR. HOLT: Okay.

Q. (By Mr. Holt) Okay. We'll just talk about this communication here. You would agree that this was an e-mail from Ms. Swanson to yourself and Ms. Chen, correct?

A. Yes.

Q. And it -- it says, "Here is the letter to send to Galveston County commissioners court. Do we want to add a reference to the 2011 retrogression?"

What did you mean by that? I mean, what do you believe Ms. Swanson meant by that?

MS. PRATHER: Objection, form.

You can answer if you can.

A. From what I understood, this was in reference to the last redistricting cycle.

Q. (By Mr. Holt) Okay. And I will represent that I did click on the Google doc that's on the second page, and it was no longer there. Do you remember what that document was?

A. Verbatim, no, I don't.

Q. Okay. And there in the last paragraph it says, "Roxy, how many groups do you think would be interested in

signing on?" Do you recall how many groups were interested in signing on?

MS. VALL-LLOBERA: Objection, privilege.

MR. HOLT: I mean, I just -- I mean, you're not representing her at this deposition. I don't see how you -- I understand you can bring that objection, but I don't think you can instruct her not to answer. This is in an e-mail that she forwarded to Commissioner Holmes. So, any type of privilege would have been waived. I just -- I think I should be able to talk about this e-mail specifically. That's all I'm trying to do.

MS. RICHARDSON: What was the question again?

MR. GEAR: Excuse me, and for the record, are we talking about Exhibit 8?

MR. HOLT: Yes.

MS. VALL-LLOBERA: I -- I believe that is the --

MR. HOLT: Did I e-mail the wrong exhibit here?

MR. GEAR: I think you did.

MR. HOLT: Tuesday, October 26th?

MS. RICHARDSON: I -- the e-mail we're looking at is from -- is a forwarded e-mail to Stephen Holmes on Tuesday, October 26th.

MR. HOLT: And on the bottom of that page, there is an e-mail she forwarded, right? No, nope.

MR. GEAR: No.

MR. HOLT: Give me one minute here, guys, I am so sorry.

MS. RICHARDSON: Oh, yeah, the one that you put in the e-mail is different than the one that you just gave us.

MR. HOLT: Oh, goodness. Okay. Let me just break for two minutes here. I'm going to make sense of this. My apologies, guys. I'm really sorry.

THE VIDEOGRAPHER: Off the record at 3:20.

(Recess taken)

THE VIDEOGRAPHER: We're back on the record at 3:24.

MR. HOLT: Okay. I apologize for my lack of organization. I had circulated the correct exhibit in the conference room but attached the incorrect exhibit. And I have now sent out an e-mail titled "Corrected Exhibit 8." It's my understanding that that matches with the conversation that we've been having; is that correct? Any objections to that?

THE PLAINTIFFS: (No response.)

MR. HOLT: Hearing none, we'll move forward here. And that --

MS. VALL-LLOBERA: Counsel, before we proceed, can the court reporter read the last question that I objected to?

MR. HOLT: Sure.

THE REPORTER: QUESTION" -- sorry.

"QUESTION: And there in the last paragraph it says, 'Roxy, how many groups do you think would be interested in signing on?' Do you recall how many groups were interested in signing on?"

MS. VALL-LLOBERA: I withdraw my objection.

MR. HOLT: Okay. Thank you.

Q. (By Mr. Holt) Do you remember how many groups signed onto this letter?

A. I do not.

Q. Do you remember what this letter was?

A. Not specifically but what I remember is it was definitely a letter asking about the timeline of the redistricting and possibly what would be the opportunities for the public to have their input.

Q. Okay. And let's look up at the top e-mail, an e-mail that you sent to Commissioner Holmes on October 26th, 2021. Do you see that?

A. I do.

Q. And is this -- is this an e-mail -- is this the correct e-mail that you sent to Commissioner Holmes on

that day?

A. It is.

Q. Why did you forward this e-mail to Commissioner Holmes?

A. I was asked to.

Q. By whom?

A. Stephanie Swanson.

Q. And you say, "Here's the original e-mail." Had you spoken with him about this on the telephone or somewhere else that he had requested the original e-mail?

A. No. That was just -- that's my form of how I conduct my business. I didn't assume that he knew what I was talking about; so, I wanted to include the original e-mail so he would know what I was referring to.

Q. You hadn't had a prior conversation with him about this letter?

A. No, not with the letter. I think I was just getting in touch with him to let him know that the letter was coming and this is what I was asking along with giving him information about possibly the letter that we were working on.

Q. Okay. And you said, "I'm hoping to get enough Galveston County citizen groups to step up and sign on. I was hoping you could offer some suggestions."

Do you recall any suggestions that

Commissioner Holmes gave you of groups that would sign onto this?

A. I do not.

Q. And this e-mail was on October 26th, 2021, correct?

A. Yes.

Q. So, you would agree that as early as October 26th, 2021, you were communicating with Commissioner Holmes regarding redistricting in Galveston County?

A. Yes. I was attempting to let him know the work that I was doing and the efforts we were making to galvanize the community, yes.

(Exhibit 9 marked)

MR. HOLT: Now I'm going to move on to Ex- -- what I have marked as Exhibit 9. And I believe I already e-mailed this out, but I will send another e-mail properly identifying it. Just give me one minute here.

Okay. I just sent that out.

Q. (By Mr. Holt) Do you recognize this e-mail, Ms. Williamson?

A. Yes. Now it's making sense.

Q. What is this e-mail that's dated Tuesday, October 26th, 2021, at 2:27 p.m. Central Time?

A. As I said before, I was alerting him of the

letter that we were working on and getting as much information as I could. And as stated in the previous e-mail by Miss Swanson, we were asking if he knew of any other groups or people that we needed to include in distributing this letter or getting them to take part and participate in the ad- -- advocacy that was going on.

Q. Okay. So -- so, let's look down at Exhibit 9 to the first e-mail there. Looks like it was sent on October 26th at 6:55 a.m. Do you see that?

A. Uh-huh. I do.

Q. You say, "Good morning, Commissioner Holmes. Steph Swanson and the groups are putting together a letter of advocacy to be distributed to the county judge and commissioners. Are there any community leaders you would recommend to assist and possibly sign onto the letter? I appreciate any information you can provide. Thank you. Yours in service, Roxy."

Would you agree that's an accurate reflection of what is in the e-mail?

A. I agree.

Q. And then Commissioner Holmes responded on October 26th at 2:27 p.m. Central Time: "Hey, Roxy. I don't have anyone in particular" -- I'm assuming he wanted to say I want the letter sent to. "Do you have a copy of the letter?" Do you see that?

A. I do.

Q. And then that -- so, that was at 2:27 p.m. Let's go back to Exhibit 8 where you forwarded him the e-mail from October 25th. You forwarded that at 2:57 p.m. on October 26th saying "Here's the original e-mail."

A. Right.

Q. Do you see that?

A. I do.

Q. So, would you agree that the e-mail at the top of the page on Exhibit 8 is in response to the request for more information from Commissioner Holmes on Exhibit 9?

A. Yes.

Q. Okay. And do you remember what was in that letter?

A. Again, not specifically other than we were advocating to have an opportunity to present better maps.

Q. Okay. What --

A. Possibly.

Q. What input did you get from Commissioner Holmes on this letter?

A. That, I cannot recall. I don't remember me personally getting any information from him.

Q. Were there times that you would e-mail Commissioner Holmes and then he would follow up with a

phone call?

A. No. Typically if I e-mailed, he would respond in kind like he did here.

Q. But you don't recall any edits or comments Commissioner Holmes provided for this letter?

A. No, I don't remember anything like that. No.

Q. Do you know if you still have a copy of the letter that you sent to Commissioner Holmes?

A. I would have to look. I don't know.

Q. Were you instructed by someone to send this letter to Commissioner Holmes?

A. It was between Steph Swanson and I that -- as she asked in the e-mail -- I responded how she asked me in the e-mail.

Q. And did you regularly engage with Commissioner Holmes regarding proposed communications to his colleagues on the commission?

A. No, I want to belie- -- I want to say that this was the one time that we did the letter to the whole commissioner -- the judge and the commissioners.

Q. Was the letter -- do you remember if it was also addressed to Commissioner Holmes?

A. I'm not sure if it was addressed individually or how it was addressed or sent. I would have to see the letter to --

Q. Was he --

A. -- tell you.

Q. Did he sign onto the letter?

A. No, I don't believe he signed onto it.

Q. But he saw it and had an opportunity to input on it before it was submitted to his colleagues on the commission?

A. Or at least he had a chance to see it, yes.

Q. Okay.

(Exhibit 10 marked)

Q. (By Mr. Holt) I'm going to hand you what's marked as Exhibit 10.

MR. HOLT: I'll send that out through e-mail here. Just give me one moment.

So, I'm going to attach, everyone, just ECF 48. It's a copy of defendants' motion to dismiss that was filed against the United States on the 14th of June, 2022; and what I have marked as Exhibit 10 was Exhibit B to that filing. For reference that's pages 60 through 62 of the PDF as we view it in the PDF reader.

Just waiting for that to send.

Q. (By Mr. Holt) Okay, Ms. Williamson. Do you recognize what has been marked as Exhibit 10?

A. Not really.

Q. If I represent to you that it is a article

From: Roxy D Hall Williamson
Sent: Thursday, November 4, 2021 2:33 PM CDT
To: ruth12340992@att.net; musemm@sbcglobal.net; bjrice@academicplanet.com; sdholmes1@aol.com; Holmes, Stephen; sharonlewis@galvestontx.gov
CC: kimjyancy@gmail.com; Jonathan Warren; djohnson_76@yahoo.com; patriciatoliver67@gmail.com; lmcgrewl@sbcglobal.net; shawn p.; brittneywalker@live.com; jreneaka24@gmail.com; Janis Matthews; lillian@hotmail.com; JCompian@gmail.com; lthierry@utmb.edu; iancbarrett@gmail.com; Lawanda Ward; Corlie Jackson; riversgalveston@gmail.com; McAfee.vanessa1@gmail.com; WHKINGIII@gmail.com; keith@henryactiontoday.com; pdrjvj@aol.com; henry.keith2@gmail.com; Heidi Gordon; ibcgitx@gmail.com; Brandon Williams; Jesse Gaines; Stephanie Swanson; Hilary Harris Klein; Candela Cerpa
Subject: Re: Galveston Redistricting Coalition

The Galveston City Council Redistricting workshop, October 28, 2021
https://galvestontx.new.swagit.com/videos/142478

Roxy D. Hall Williamson
CROWD Fellow Texas
P.O. Box 3286
Galveston, Texas 77552
(409) 502-2912

CROWD ACADEMY

"The imperative is to define what is right and do it."

-Barbara Jordan.

On Thu, Nov 4, 2021 at 3:08 PM Roxy D Hall Williamson <roxydhallwilliamson@gmail.com> wrote:

Good afternoon Galveston County!
Quite a bit going on... Here are a few updates as we prepare:

* For those of you prepared to sign on to the advocacy letter, please forward your logos and signatories to me or Steph Swanson so we can update the letter illustrating the depth of our community support. This assists with establishing important information for litigation, if necessary.

* The Honorable County Commissioner Stephen Holmes will be speaking on Redistricting this evening (signup information attached). Please sign up if you are available. I'm hoping he can speak to the timelines of the hearings, especially opportunities for Public Comment during his presentation.

* There is an article in the Galveston Daily News today by John Wayne Ferguson (409-683-5226; john.ferguson@galvnews.com; Twitter: @johnwferguson) "County redistricting might

cut out lone Democrat." There are three maps, the current precincts map, and two proposed maps (picture of article is attached). Please see the talking points sent from Steph Swanson (LWV):

Talking Points on Map Proposals:

To view the current map proposals and to submit public comments: https://www.galvestoncountytx.gov/our-county/county-judge/redistricting

***Please note that the most compelling testimony will be based on personal familiarity with the area. For example, why La Marque shouldn't be split in three, or why the west side of Dickinson has more in common with La Marque than with League City or Friendswood. **And if you've ever faced issues with county government, such as problems with election polling places, COVID response, or county officials or employees who haven't responded to your requests, please mention those.**

- I support Map Proposal 1. This map keeps Commissioner Holmes' district somewhat intact. However, I do object to the Bolivar Peninsula being included in Precinct 3. The Bolivar Peninsula is a drastically different community that is predominantly white. This community has little in common with the residents that currently reside in Precinct 3, which has a large, diverse population of LatinX and African American residents.
- I am also deeply concerned that the same mapping firm, Geographic Strategies, has been hired by the County once again to draw the county's maps after the maps that this firm produced in 2011 were found to discriminate against voters of color by the Department of Justice. It should also be noted that the Department of Justice objected to including the Bolivar Peninsula in Precinct 3 in 2011.
- We are disappointed that the public has not been included more in this process. We are also concerned that Commissioner Holmes was not afforded the opportunity to provide input on the map proposals.
- Map Proposal 2 cracks communities of color apart and destroys an existing coalition precinct of Black and Latino voters in Precinct 3.

Please review the enclosed information and share with your networks. Thank you for your time and attention to this advocacy work. Have an amazing afternoon.

Yours in service
Roxy

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CROWD Fellow Texas
P.O. Box 3286
Galveston, Texas 77552
(409) 502-2912

"The imperative is to define what is right and do it."

-Barbara Jordan.

From: Roxy D Hall Williamson
Sent: Monday, October 11, 2021 4:14 PM CDT
To: Holmes, Stephen
Subject: Fwd: Zoom info

---------- Forwarded message ---------
From: **Stephanie Swanson** <steph.swanson.lwvtx@gmail.com>
Date: Mon, Oct 11, 2021 at 4:03 PM
Subject: Zoom info
To: Roxy D Hall Williamson <roxydhallwilliamson@gmail.com>

Stephanie Swanson is inviting you to a scheduled Zoom meeting.

Topic: Galveston Co.
Time: Oct 11, 2021 04:00 PM Central Time (US and Canada)

Join Zoom Meeting
https://us02web.zoom.us/j/81211234598?pwd=elRzQzBzdzI2aThrQ3FqUWtjUmkwUT09

Meeting ID: 812 1123 4598
Passcode: 181414
One tap mobile
+13462487799,,81211234598#,,,,*181414# US (Houston)
+14086380968,,81211234598#,,,,*181414# US (San Jose)

Dial by your location
+1 346 248 7799 US (Houston)
+1 408 638 0968 US (San Jose)
+1 669 900 6833 US (San Jose)
+1 253 215 8782 US (Tacoma)
+1 312 626 6799 US (Chicago)
+1 646 876 9923 US (New York)
+1 301 715 8592 US (Washington DC)
Meeting ID: 812 1123 4598
Passcode: 181414
Find your local number: https://us02web.zoom.us/u/kvs46PEmY

--
Stephanie Swanson
Issue Chair of Redistricting & Census

League of Women Voters of Texas
281.795.0011

"We must be even more committed in this time...Nothing would be more tragic than for us to turn back at this point, because we must declare normalcy never again."
—Rev. Dr. William Barber II

--

Roxy D. Hall Williamson
CROWD Fellow Texas
P.O. Box 3286
Galveston, Texas 77552
(409) 502-2912

From: Roxy D Hall Williamson
Sent: Monday, October 11, 2021 4:10 PM CDT
To: Holmes, Stephen
Subject: Fwd: Zoom info

Link below
---------- Forwarded message ---------
From: **Stephanie Swanson** <steph.swanson.lwvtx@gmail.com>
Date: Mon, Oct 11, 2021 at 4:03 PM
Subject: Zoom info
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Meeting ID: 812 1123 4598
Passcode: 181414
One tap mobile
+13462487799,,81211234598#,,,,*181414# US (Houston)
+14086380968,,81211234598#,,,,*181414# US (San Jose)

Dial by your location
+1 346 248 7799 US (Houston)
+1 408 638 0968 US (San Jose)
+1 669 900 6833 US (San Jose)
+1 253 215 8782 US (Tacoma)
+1 312 626 6799 US (Chicago)
+1 646 876 9923 US (New York)
+1 301 715 8592 US (Washington DC)
Meeting ID: 812 1123 4598
Passcode: 181414
Find your local number: https://us02web.zoom.us/u/kvs46PEmY

--
Stephanie Swanson
Issue Chair of Redistricting & Census

League of Women Voters of Texas
281.795.0011

"We must be even more committed in this time...Nothing would be more tragic than for us to turn back at this point, because we must declare normalcy never again."
—Rev. Dr. William Barber II

--

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P.O. Box 3286
Galveston, Texas 77552
(409) 502-2912

Texas Democratic Women of Galveston County
September Membership Meeting Agenda
November 4, 2021
7:00 pm Via Zoom

I. **7:00 pm Meeting Called to Order** [redacted]

II. **7:00 pm Pledge of Allegiance** [redacted]

III. **7:01 pm Housekeeping Rules** [redacted]

IV. **7:02 pm Welcome Members and Guests Speakers** [redacted]

V. **7:05 pm Guest Speaker, Hon. Stephen Holmes, Galveston County Commissioner of Precinct 3 will discuss the two proposed maps put out by the GCCC and how you can provide feedback. Commissioner Holmes will take questions.**

VI. **7:40 pm Club Business**

A. **Adopting of Oct Membership Meeting Minutes** [redacted] (1 Min)
B. **Treasurer's Report** [redacted] (2 Min)
   1. Cash on Hand, Monthly Sustaining Donations, Sign up to become a Sustaining Donor: (https://secure.actblue.com/donate/tdw-gc)
C. **Finance/Fundraising** [redacted] (2 Min)
   1. Board Meeting: Decided to postpone the Minnie Fisher fundraiser until after the new year due to major life changes among board members during Oct.
   2. We are still accepting Silent Auction Donations for the event (contact: angiedwilson2@gmail.com)
D. **Legislative Committee** [redacted] (6 Min)
   1. Supreme Ct Hearings on TX Abortion Ban (CTA / Questions if any)
   2. Greg Abbott Banned Book List (CTA / Questions if any)
E. **Membership Committee** [redacted] (2 Min)
   1. Current Members/Join TDW-GC: https://secure.actblue.com/donate/tdwgcjoin)
   2. Happy Birthdays for the Month November
F. **Help Wanted: Communications Help Needed** [redacted] (Contact stefania.sardo11@gmail.com) (1 Min)
   1. Social Media Person
   2. Newsletter Person
   3. Organizational Messaging
   4. Graphics Person
G. **Training Opportunity: Annie's List Candidate Training Workshop** [redacted] (1 Min) Available to us if we have enough WOMEN interested they will do a special

class for us on Sunday 11/14. It's great for Candidates and Campaign Staffers. Men are welcome too but we need a good women turnout to make it a go. Interested? Email Heidi asap at heidigordon2018@gmail.com. Alternatively you can sign up for their virtual workshop being held this Saturday from 10-4 over Zoom (Cost $75) https://secure.actblue.com/donate/virtual201

H. **TDW-GC Annual Meeting** [redacted] (5 Min)

Executive Board set the date for Thursday Jan 24, 2022: Every year we update bylaws and elect a new executive board in accordance with the organization's bylaws. In preparation for that, we have formed three ad-hoc (temporary committees now)

1. **Nominations Committee:** [redacted] receives executive board member nominations and runs the election at the Annual Meeting. (Note: serving on the Nominations Committee does not preclude you from running for a board position) If interested in joining the committee, contact: Jasmine Tolhurst at jasminetolhurst@gmail.com
2. **Bylaws Committee:** [redacted] every year we solicit changes, additions or deletions to our bylaws from our membership and from our executive board. (We have attached bylaws to the agenda email for your review) We begin soliciting these changes 60-90 days out from the annual meeting with a deadline for submissions no later than 30 days before the annual meeting. The bylaws committee will go through the submissions, present them to the board to vote on and incorporate them into our new bylaws to be voted on by the membership at the annual meeting. (We will send a draft out in advance of the meeting to save time). If you would like to help with revising the bylaws or if you would like to submit changes, please reach out to Stefania Sardo at stefania.sardo11@gmail.com
3. **Annual Meeting Planning Committee:** [redacted] our annual meeting was held via Zoom last year due to Covid, but it's usually a lovely dinner event with speakers, presentations, an election and a changing of the guard. This year we would like to again have a Covid conscious event with a virtual option for members who do not want to attend in person. This will take a combination of good event planning skills combined with technical A/V skills to ensure our members at home are able to hear everything through their computer. If you would like to join the planning committee, please contact [redacted] at mimimontgomery@yahoo.com

VII. 8:00 pm [redacted] **with Party updates**

VIII. 8:10 pm Candidates' Corner (Candidates speak for 2 min or less each)

IX. 8:20 pm Member Announcements

X. 8:30 pm Meeting Adjourned