

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

RICHMOND DIVISION

DAWN CURRY PAGE, an individual;
GLORIA PERSONHUBALLAH, an
individual; JAMES FARKAS, an individual,
Plaintiffs,

v.

CHARLIE JUDD, in his capacity as Chairman
of the Virginia State Board of Elections;
KIMBERLY BOWERS, in her capacity as
Vice-Chair of the Virginia State Board of
Elections; DON PALMER, in his capacity as
Secretary of the Virginia State Board of
Elections,

Defendant.

Civil Action No. 3:13-cv-678

PLAINTIFFS' COMBINED OPPOSITION
TO MOTION TO QUASH AND/OR FOR A
PROTECTIVE ORDER AND
MEMORANDUM IN SUPPORT OF
MOTION TO ENFORCE COMPLIANCE
WITH SUBPOENA

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Plaintiffs Dawn Curry Page, Gloria Personhuballah, and James Farkas (“Plaintiffs”), respectfully submit this opposition to the motion to quash and/or for a protective order (“Motion to Quash”) filed by third-party Christopher Marston. This submission also serves as Plaintiffs’ memorandum in support of their motion to enforce subpoena.¹

Mr. Marston’s Motion to Quash and Plaintiffs’ Motion to Enforce Subpoena arise from a subpoena for documents issued to Mr. Marston on March 5, 2014. Although he is neither a member nor an employee of the Virginia General Assembly, Mr. Marston asserts he is entitled to withhold nearly 500 highly relevant documents relating to Virginia’s 2011-2012 Congressional redistricting process based on a sweeping claim of legislative privilege. But Mr. Marston has failed to put forth the facts he must prove to meet *his burden* of establishing that these privileges apply. Most glaringly, his claim of legislative privilege relies on nothing more than a few sentences in the Motion to Quash asserting that he was operating in a “legislative capacity.” He fails to provide a declaration, an affidavit, or any supporting documents -- such as a retainer letter -- to demonstrate the terms of his relationship with the General Assembly and his role in the redistricting process. Instead, he asks the Court to simply take him at his word that he functioned in the same capacity as a member or staffer of the General Assembly and that hundreds of documents -- all of which he concedes are relevant -- should be kept from Plaintiffs based on this vague invocation of the legislative privilege. This is patently insufficient. Mr. Marston must provide facts to support the claim of privilege, and his failure to do so requires rejecting the claim.

Mr. Marston’s sweeping claim of attorney-client privilege fares no better. This claim, which Mr. Marston uses to withhold dozens of relevant documents, rests on nothing more than

¹Plaintiffs have withdrawn their deposition notices and subpoenas issued to Robert Bell and William Robert Janis. Accordingly, this memorandum focuses on only the subpoena for documents issued to Mr. Marston and does not address the arguments in the Motion to Quash relating to Bell and Janis.

one sentence in the Motion to Quash asserting that Mr. Marston is a member of the Virginia Bar who “provided legal counsel to the Virginia General Assembly during the 2010 redistricting process.” Dkt. #62 at 7. Again, Mr. Marston fails to provide a declaration, an affidavit, or any documents to demonstrate that he was retained *as an attorney* by the General Assembly and functioned in that capacity during the redistricting process by providing legal advice to the General Assembly. Indeed, the cryptic descriptions in his privilege log directly contradict Mr. Marston’s claim that he was counsel to the General Assembly. The log entries repeatedly describe Mr. Marston as “Counsel to Virginia House Republican Campaign Committee.” *See, e.g.*, Ex. A, 000018, 000044, 000051. That Campaign Committee is an arm of the Virginia Republican Party and is of course not an extension of the Virginia General Assembly. Contrary to the claim in his brief, Mr. Marston’s privilege log does not include *any* entries in which he describes himself as counsel to the General Assembly, and the attorney-client privilege therefore cannot apply to Mr. Marston’s communications with members and employees of the General Assembly.²

Even if Mr. Marston had provided the necessary factual foundation to support his legislative privilege claim, the objection should nonetheless be denied. First, when the attenuated nature of Mr. Marston’s relationship to the General Assembly is weighed against Plaintiff’s compelling need for the documents, the need for the documents clearly should prevail. Second, as described below, the General Assembly has waived any claim of legislative privilege by relying on an expert witness in this case -- John Morgan -- who was involved in drawing the Congressional map and has selectively disclosed internal deliberations of the General Assembly in his expert report. The General Assembly cannot use legislative privilege as both a shield and

²Mr. Marston’s disclosure that he was working for the Virginia Republican Party also casts serious doubt on his claim that he was a consultant to the Virginia General Assembly and was working in a legislative capacity.

a sword. Having permitted Morgan to disclose internal thought processes, the General Assembly cannot now sanction Mr. Marston's attempt to prevent other internal deliberations from seeing the light of day.

I. BACKGROUND

Plaintiffs filed this action on October 2, 2013, to challenge the constitutionality of Virginia's Congressional District 3 ("CD 3") as a racial gerrymander in violation of the Equal Protection Clause. Dkt. #1. The Virginia General Assembly passed the current map of congressional districts in January 2012, which includes the bizarrely shaped CD 3. *Id.* at ¶¶ 23, 25-26. A prior version of CD 3 was found to be the result of an unconstitutional gerrymander, and the current version bears striking similarities. *Id.* at ¶¶ 28-30. Notably, CD 3 completely disregards traditional districting principles--it is not at all compact and disregards important political subdivisions and geographical boundaries. *Id.* at ¶¶ 33-34.

Plaintiffs contend that the unusual shape of CD 3 is once again the result of a practice known as "racial packing." *Id.* at ¶ 33. By moving more African-American voters into a congressional district that is already predominately African-American, lawmakers can dilute their influence from surrounding districts with no countervailing consequences. In this case, the 2012 congressional plan increased the African-American voting age population in CD 3 from 53.1% to 56.3%. *Id.* at ¶ 31.

In order to substantiate the claim that CD 3 is in fact the result of an unconstitutional gerrymander, Plaintiffs sought discovery from multiple sources, including Mr. Marston. Mr. Marston came to Plaintiffs' attention as a consultant to the Virginia Republican Party who communicated with members and staffers of the General Assembly in connection with the redistricting process. On March 5, 2014, Plaintiffs issued a subpoena duces tecum to Mr. Marston, Dkt. #62-1, at 9, seeking the following categories of documents: draft maps related

to the 2012 congressional redistricting; communications with the General Assembly relating to the 2012 congressional redistricting; and communications with the Republican National Committee and National Republican Congressional Committee relating to the 2012 congressional redistricting. *Id.* at 13. To date, Mr. Marston has not produced any documents. On April 2, 2014, this Court ordered Mr. Marston to serve a privilege log detailing with specificity the basis for withholding documents from Plaintiffs. Dkt. # 70. On April 10, 2014, Mr. Marston submitted the privilege log to Plaintiffs. It shows that he is withholding nearly 500 documents on a claim of legislative privilege, including more than 60 documents that he is also withholding on the claim of attorney-client privilege.

Based on the descriptions in the privilege log, it is clear that the documents Mr. Marston is withholding relate directly to the Congressional redistricting process and are highly relevant. For example, several entries describe email chains “between Republican members of House of Delegates and consultant advising House Republicans regarding redistricting,” and were sent to or from Bill Janis, the self-proclaimed lead drafter of Virginia’s 2012 congressional redistricting. *See, e.g.*, Ex. A. 000006, 000035, 000055. The log contains dozens of references to Mr. Marston’s role as a representative of the Virginia House Republican Campaign Committee, making it clear that he was acting on behalf of the Virginia Republican Party in the redistricting process.

II. ARGUMENT

A. Mr. Marston Has Failed To Establish That Either The Legislative Privilege Or The Attorney-Client Privilege Applies.

“Courts disfavor assertions of evidentiary privilege because they shield evidence from the truth-seeking process.” *RLI Ins. Co. v. Conseco, Inc.*, 477 F. Supp. 2d 741, 748 (E.D. Va. 2007) (*citing Herbert v. Lando*, 441 U.S. 153, 175 (1979); *In re Grand Jury Proceedings*, 727 F.2d

1352, 1355 (4th Cir. 1984)). Thus, evidentiary privileges are construed narrowly, and sweeping, unsupported assertions of privilege do not shield documents from the discovery process. “A party asserting privilege has the burden of demonstrating its applicability.” *N.L.R.B. v. Interbake Foods, LLC*, 637 F.3d 492, 501 (4th Cir. 2011). Furthermore, a “conclusory allegation” that a document is protected will not suffice. *RLI Ins. Co.*, 477 F. Supp. 2d at 751. The proponent of the privilege must “demonstrate specific facts showing that the communications were privileged.” *Id.*

Weighed against these standards, Mr. Marston has failed to carry that burden and barely attempts the task. The Motion to Quash says only that “Marston is an attorney admitted to practice in the Commonwealth of Virginia who provided legal and consulting services to the Virginia House of Delegates in connection with the 2010 redistricting cycle,” and subsequently claims that he “advised members of the General Assembly concerning the redistricting process.” Dkt. #62, at 2, 7. This bald assertion of both attorney-client and legislative privilege falls woefully short of the mark. Perhaps worse, the assertion is simply inaccurate. Quite apart from whether he provided legal and consulting services to the “Virginia House of Delegates,” as he initially claimed (albeit without evidentiary support), Mr. Marston’s privilege log instead asserts that he represented the “Virginia House Republican Campaign Committee.” Thus, Mr. Marston apparently operated as a Republican political consultant, but now seeks to shroud his admittedly responsive documents with either attorney-client or legislative privilege. He is entitled to neither.

1. Mr. Marston Is Not Entitled to Claim The Attorney-Client Privilege.

First, to establish the attorney-client privilege, Mr. Marston must demonstrate not only that he is a lawyer, but that he provided “legal” advice in confidence to a “client.” Merely because a lawyer was involved in a communication is, of course, far from sufficient to establish

the privilege. But neither Mr. Marston's Motion to Quash, nor his belated privilege log provides any insight into the alleged legal advice, as the entries simply assert that either an attorney-client relationship or a legislative relationship exists, and that the subject of the documents is "redistricting." Given that the subpoena at issue asked exclusively for documents concerning redistricting, these entries give no information that would tend to confirm or rebut Mr. Marston's privilege assertion. *See, e.g.*, Ex. A. 000138 ("Email communication between attorney and clients regarding redistricting."); 000013 ("Email communications between staff and consultant advising House Republicans regarding redistricting.").

This is plainly insufficient. To establish the appropriate application of the attorney-client privilege, Mr. Marston must demonstrate not only that he was a lawyer but that he was providing actual "legal advice" to a "client" in confidence. As the Fourth Circuit has made plain "[t]his Circuit has adopted the 'classic test' for determining the existence of attorney-client privilege: 'The privilege applies only if (1) the asserted holder of the privilege is or sought to become a client; (2) the person to whom the communication was made (a) is a member of the bar of a court, or his subordinate and (b) in connection with this communication is acting as a lawyer; (3) the communication relates to a fact of which the attorney was informed (a) by his client (b) without the presence of strangers (c) for the purpose of securing primarily either (i) an opinion on law or (ii) legal services or (iii) assistance in some legal proceeding, and not (d) for the purpose of committing a crime or tort; and (4) the privilege has been (a) claimed and (b) not waived by the client.'" *Hawkins v. Stables*, 148 F.3d 379, 383 (4th Cir. 1998) (quoting *United States v. Jones*, 696 F.2d 1069, 1072 (4th Cir.1982)). "The burden is on the proponent of the attorney-client privilege to demonstrate its applicability." *Id.* (quoting *Jones*, 696 F.2d at 1072).³

³Virginia law is in accord. "As a general rule, confidential communications between an attorney and his or her client made in the course of that relationship and concerning the subject matter of the attorney's representation are

Mr. Marston has fallen far short of the showing necessary to demonstrate the appropriate application of the privilege. Despite his assertion that he was counsel to the Virginia House Republican Campaign Committee, Mr. Marston has not demonstrated that an attorney-client relationship existed with any of the individual legislators or staff members with whom he corresponded. Furthermore, his generic descriptions regarding “redistricting” fail to show communications “for the purpose of securing . . . legal services,” particularly because Mr. Marston also worked in a non-legal capacity as a redistricting consultant. An attorney giving non-legal advice--or even advice where legal issues are incidental to non-legal issues--is not entitled to claim attorney-client privilege. *See Neuberger Berman Real Estate Income Fund, Inc. v. Lola Brown Trust No. 1B*, 230 F.R.D. 398, 411 (D. Md. 2005). On this record, his objection necessarily fails. Plaintiffs’ respectfully submit that his motion should be denied and this Court should order him to produce all responsive documents.

2. Mr. Marston Is Not Entitled To Claim Legislative Privilege.

a. The Legislative Privilege Has No Application to Political Consultants

As a general matter, privilege--including the legislative privilege--must be construed narrowly. Privileges “are not lightly created nor expansively construed.” *United States v. Nixon*, 418 U.S. 683, 710 (1974); *Walton*, 280 Va. at 122, 694 S.E.2d at 549 (“[T]he privilege is an exception to the general duty to disclose, is an obstacle to investigation of the truth, and should be strictly construed.”). While legislative privilege can, under certain circumstances, extend to non-legislators such as staff members, such expansion should not be granted lightly and there is no basis to do so in this case.

privileged from disclosure. . . . The objective of the attorney-client privilege is to encourage clients to communicate with attorneys freely, without fearing disclosure of those communications made in the course of representation, thereby enabling attorneys to provide informed and thorough legal advice. . . . Nevertheless, the privilege is an exception to the general duty to disclose, is an obstacle to investigation of the truth, and should be strictly construed.” *Walton v. Mid-Atl. Spine Specialists, P.C.*, 280 Va. 113, 122, 694 S.E.2d 545, 549 (2010) (internal citations omitted).

The production of evidence from a non-legislator is a much less serious threat to the interests underpinning legislative privilege. The privilege exists to “promote[] a healthier, more thriving class of politicians by ensuring that legislative offices are not limited only to those individuals who are willing to withstand a lawsuit.” *McCray v. Maryland Dep't of Transp., Maryland Transit Admin.*, 741 F.3d 480, 485 (4th Cir. 2014). Non-legislators, however, are a step removed from this concern. Thus, when faced with facts similar to this case, the court in *Rodriguez v. Pataki*, 280 F. Supp. 2d 89, 101 *aff'd*, 293 F. Supp. 2d 302 (S.D.N.Y. 2003), ordered the production of documents from an advisory task force on redistricting, stating that the existence of non-legislators in the group “tends to weaken any claim that the disclosure of [the task force]’s deliberations and documents would cause future members of the Legislature not to engage in frank discussions of proposed legislation. *See also Comm. for a Fair & Balanced Map v. Illinois State Bd. of Elections*, 11 C 5065, 2011 WL 4837508 (N.D. Ill. Oct. 12, 2011) (“A contrary ruling would allow a legislator to cloak any communication with legislative privilege by simply retaining an outsider in some capacity.”) (internal alterations and quotation marks omitted).

In this case, Mr. Marston has not even attempted to justify the novel extension of legislative privilege to himself. At the very least, non-legislators must be “properly acting in a legislative capacity” before they can seek to assert legislative privilege. *Kensington Volunteer Fire Dep't, Inc. v. Montgomery Cnty., Md.*, 684 F.3d 462, 470 (4th Cir. 2012). The Motion to Quash, however, merely recites that “Marston is an attorney admitted to practice in the Commonwealth of Virginia who provided legal and consulting services to the Virginia House of Delegates in connection with the 2010 redistricting cycle,” and claims that he “advised members of the General Assembly concerning the redistricting process.” Dkt. #62, at 2, 7. These generic

descriptions are a far cry from demonstrating that Mr. Marston was acting “in a legislative capacity.” Indeed, as detailed above, Mr. Marston is described in the log as “counsel to the Virginia House Republican Campaign Committee,” which (at the risk of stating the obvious) is not a part of the General Assembly. It strains credulity to assert that a consultant to a political organization was “perform[ing] legislative functions.” *Kensington Volunteer Fire Dep’t, Inc. v. Montgomery Cnty., Md.*, 684 F.3d 462, 470 (4th Cir. 2012). Even under the most favorable assumptions, Mr. Marston acted only as an outside political consultant whose correspondence is “more akin to a conversation between legislators and knowledgeable outsiders, such as lobbyists, to mark up legislation—a session for which no one could seriously claim privilege.” *Pataki*, 280 F. Supp. 2d at 101. Mr. Marston, accordingly, is not entitled to claim legislative privilege.

b. A Balance of the Hardships Favors Production of the Documents.

Even if the legislative privilege were otherwise applicable under these circumstances, it would nonetheless have to yield here. In addressing legislative privilege, the Supreme Court has held that “where important federal interests are at stake,” legislative privilege “yields.” *U.S. v. Gillock*, 445 U.S. 360, 373 (1980). Consistent with *Gillock*, most federal courts to consider the issue hold that legislative privilege for state officials is a “qualified” privilege, which may be overcome with a showing of substantial need. *See In re Grand Jury*, 821 F.2d 946, 957 (3d Cir. 1987) (“[S]uch privilege must be qualified, not absolute, and must therefore depend on a balancing of the legitimate interests on both sides.”); *Doe v. Nebraska*, 788 F. Supp. 2d 975, 984 (D. Neb. 2011) (observing that state legislators have “a very narrow and qualified” privilege regarding document productions).

The Fourth Circuit has given little guidance on “legislative privilege,” but has applied the related doctrine of “legislative immunity” to shield legislators from being sued over or testifying in court about actions taken within the scope of their legislative duties. *See, e.g., Burtnick v.*

McLean, 76 F.3d 611, 613 (4th Cir. 1996). Like legislative privilege, this doctrine also has limits. In particular, it does not apply with equal force to requests for document production. See *Miles-Un-Ltd., Inc. v. Town of New Shoreham, R.I.*, 917 F. Supp. 91, 100 (D.N.H. 1996) (“Although the doctrine of legislative immunity does apply in the personal testimony realm, the immunity does not extend to certain types of documentation requests.”); *Marylanders for Fair Representation, Inc. v. Schaefer*, 144 F.R.D. 292, 302 n.20 (D. Md. 1992) (legislative immunity is “personal immunity from liability as well as an evidentiary and testimonial privilege. It does not, however, extend to certain types of documentation.”). The production of documents imposes a significantly lesser burden, and therefore does not implicate the primary motivation for legislative immunity, which is “to prevent legislators from having to *testify* regarding matters of legislative conduct.” *Schlitz v. Commonwealth of Virginia*, 854 F.2d 43, 46 (4th Cir.1988) (emphasis added), *overruled on other grounds by Berkley v. Common Council of City of Charleston*, 63 F.3d 295, 303 (4th Cir. 1995).

Given that the present controversy concerns only a request for documents rather than testimony, this Court should--consistent with *Gillock*--look to the guidance of other federal courts in balancing the interests at stake. The relevance of Mr. Marston’s documents to this proceeding can hardly be doubted. The critical issue to be addressed and resolved by the Court in the trial of this matter is the General Assembly’s intent and purpose in preparing and enacting the current configuration of CD3 and increasing the African-American voting age population by no less than three full percentage points. Mr. Marston, by his own admission, communicated extensively and directly with those charged with drawing the map. These contemporaneous emails are likely to be highly relevant to the purpose and intent behind this map’s design -- issues that are central to this litigation.

The stakes, moreover, could hardly be higher. An action challenging the constitutionality of redistricting goes to the core rights of citizens to have a say in their government. “No right is more precious in a free country than that of having a voice in the election of those who make the laws under which, as good citizens, we must live.” *Wesberry v. Sanders*, 376 U.S. 1, 17-18 (1964). Indeed, Congress has specifically authorized special procedures for such cases. 28 U.S.C. § 2284. Yet litigating a redistricting case necessarily pulls back the curtain on legislative proceedings, and an expansive view of legislative immunity would never permit such lawsuits to succeed.

For this reason, several courts have specifically held that even a *legislator’s* interest in avoiding discovery is outweighed by the public’s interest in protecting voting rights. *See, e.g., Baldus v. Members of Wis. Gov’t Accountability Bd.*, Nos. 11-CV-562, 11-CV-1011, 2011 WL 6122542, at *2 (E.D. Wis. Dec. 8, 2011) (“[G]iven the serious nature of the issues in this case and the government’s role in crafting the challenged redistricting plans, the Court finds that legislative privilege simply does not apply to the documents and other items the plaintiffs seek in the subpoenas they have issued.”); *Comm. for a Fair & Balanced Map v. Ill. State Bd. of Elections*, No. 11 C 5065, 2011 WL 4837508, at *6 (N.D. Ill. Oct. 12, 2011) (“Voting rights cases, although brought by private parties, seek to vindicate public rights. In this respect, they are akin to criminal prosecutions.”); *Pataki*, 280 F. Supp. 2d at 102 (“[T]here can be no question that [this redistricting case] raises serious charges about the fairness and impartiality of some of the central institutions of our state government,” which “suggests that the qualified legislative or deliberative process privilege should be accorded only limited deference.”). Plaintiffs in this lawsuit have already agreed not to seek discovery from legislators. Obtaining documents from Mr. Marston is the least intrusive method possible to ensure meaningful discovery in this action.

Finally, as noted in the previous section, Mr. Marston is a private citizen rather than a legislator. Thus, a request for documents from him is a far cry from encroachment on the “right of legislators to be free from arrest or civil process for what they do or say in legislative proceedings.” *Equal Emp’t Opportunity Comm’n v. Wash. Suburban Sanitary Comm’n*, 631 F.3d 174, 180 (4th Cir. 2011) (internal quotation marks omitted). In *Marylanders for Fair Representation*, two of the panel judges noted that even where non-legislators are theoretically entitled to invoke legislative immunity, the concerns underlying this doctrine are simply not as pressing where private citizens are concerned. “[I]nquiry through [private citizens on a redistricting committee] into the factors which were taken into account by the Committee in formulating its redistricting plan would provide a means for learning pertinent information without directly impacting upon legislative sovereignty.” 144 F.R.D. at 305 (Murnaghan and Motz, JJ., concurring). Thus, even if Mr. Marston were entitled to assert legislative privilege as a general matter--which he is not--his status as a non-legislator weighs in favor of disclosure here.

Plaintiffs have a demonstrably great need for Mr. Marston’s documents and disclosing them will have, at most, a minimal effect on legislative sovereignty. Under these circumstances, plaintiffs respectfully submit, legislative privilege must yield to the fundamental rights at stake in this suit.

c. Legislative Privilege Has Been Waived.

Finally, even if the legislative privilege could have been properly invoked in these circumstances, and even if it were not so plainly outweighed by the need for these materials, it has nonetheless been waived by (a) the communication of these materials to third-party consultants, and (b) by the selective use of these materials against plaintiffs.

First, even if these materials were otherwise protected by the legislative privilege, their transmission to third-party consultants operates to waive the privilege.

Evidentiary privileges, including the legislative privilege, are waived when the privileged information is disclosed to third parties. *See Trombetta v. Bd. of Educ., Proviso Twp. High Sch. Dist. 209*, 02 C 5895, 2004 WL 868265 at *5 (N.D. Ill. Apr. 22, 2004). For this reason, courts have held in the redistricting context that disclosure of information to outside consultants waives the privilege. *See Comm. for a Fair & Balanced Map v. Illinois State Bd. of Elections*, 11 C 5065, 2011 WL 4837508 at *10 (N.D. Ill. Oct. 12, 2011) (“[T]o the extent [legislators] relied on reports or recommendations generated by outside consultants to draft the 2011 Map, they waived their legislative privilege as to these documents.”); *Baldus v. Brennan*, 11-CV-562 JPS-DPW, 2011 WL 6122542 at *2 (E.D. Wis. Dec. 8, 2011) *order clarified*, 11-CV-562 JPS-DPW, 2011 WL 6385645 (E.D. Wis. Dec. 20, 2011) (“The Legislature has waived its legislative privilege to the extent that it relied on such outside experts for consulting services.”). Here, the communication of allegedly “privileged” material by the General Assembly to third-party consultants necessarily operates to waive the application of whatever legislative privilege might have otherwise applied to these communications.

Second, even if that disclosure did not itself waive legislative privilege, Defendants waived the privilege by using the information in their case against Plaintiffs. It is axiomatic that “[s]elective disclosure for tactical purposes waives the privilege.” *United States v. Jones*, 696 F.2d 1069, 1072 (4th Cir. 1982). For this reason, legislatures must disclose information to a party where it has already been disclosed for use by the opposing party. *See Comm. for a Fair & Balanced Map* 2011 WL 4837508 at *11 (legislators “cannot invoke the privilege as to themselves yet allow others to use the same information against plaintiffs at trial”).

This case represents a particularly striking example of selective disclosure. By all appearances, Mr. Marston occupied a similar position in the redistricting process as Defendants' expert witness, John B. Morgan. Mr. Morgan's curriculum vitae states that he "[w]orked on statewide congressional, legislative, and local [redistricting] plans" in the 2011-2012 Virginia redistricting cycle. Ex. B. Virginia is also listed as a state in which, for that same cycle, "[p]lans drafted by Morgan [were] adopted in whole or part." Yet while Mr. Marston claims legislative privilege over nearly all the documents Plaintiffs have requested, Defendants put forth Mr. Morgan as their expert witness to show that the 2012 congressional redistricting plan was constitutionally sound. Mr. Morgan has even submitted a report detailing, among other things, the thought process behind the legislature's drawing of CD 3. *See* Ex. B, Supplemental Expert Report at 26 (General Assembly "had ample reason to believe that legislators of both parties, including black legislators, viewed the 55% black VAP for the House of Delegates districts as appropriate to obtain Section 5 preclearance.").

The Fourth Circuit has made clear that disclosure of privileged information "not only waives the privilege as to the specific information revealed, but also waives the privilege as to the subject matter of the disclosure." *Hawkins v. Stables*, 148 F.3d 379, 384 n.4 (4th Cir. 1998). Thus, the expert designation of Mr. Morgan and his accompanying report vitiate any claim of privilege with respect to the 2012 congressional redistricting, at the very least, insofar as it involves legislative communications with outside consultants such as Mr. Morgan or Mr. Marston. Mr. Marston should therefore be required to produce all documents withheld solely on the basis of legislative privilege.

B. Production of Documents Would Not Present an Undue Burden.

Finally, Mr. Marston claims in his Motion to Quash that producing responsive documents would constitute an undue burden. *See* Dkt. #62, at 8. That position is no longer tenable.

Plaintiffs have narrowed the request to documents concerning only the congressional redistricting, which must alleviate Mr. Marston's concern about producing state house and senate documents. Furthermore, all documents requested by Plaintiffs have already been collected and reviewed in preparing the privilege log, so producing them will not present any additional burden.

III. CONCLUSION

For all of the foregoing reasons, Plaintiffs respectfully request that the Court deny the Motion to Quash, grant Plaintiffs' Motion to enforce, and order Mr. Marston to turn over all documents withheld on the basis of legislative privilege and attorney-client privilege.

Dated: April 14, 2014

Respectfully submitted,

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Exhibit A

Document ID	Subject	From	To	Cc	Bcc	Date	Privilege	Description
000001	Congressional Redistricting	Bill Howell, Speaker, Virginia House of Delegates	Chris Marston, Esq.			8/14/2011	Legislative	Email communications between Republican member of House of Delegates and consultant advising House Republicans regarding congressional redistricting.
000006	Congressional Redistricting	Chris Marston, Esq.	Bill Janis, Member, Virginia House of Delegates			6/1/2011	Legislative	Email chain containing communications between Republican members of House of Delegates and consultant advising House Republicans regarding redistricting.
000013	WP Blog - National GOP says Va. GOP to delay Redistricting; Richmond says Not so Fast	G. Paul Nardo, Staff, Virginia House of Delegates	G. Paul Nardo, Staff, Virginia House of Delegates		Chris Marston, Esq.	6/2/2011	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
000014	WP Blog - National GOP says Va. GOP to delay Redistricting; Richmond says Not so Fast	G. Paul Nardo, Staff, Virginia House of Delegates	G. Paul Nardo, Staff, Virginia House of Delegates		Chris Marston, Esq.	6/2/2011	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
000018	Congratulations; Wrap Up	Chris Marston, Esq., Counsel to Virginia House Republican Campaign Committee	Paul Haughton, Staff, Virginia House Republican Campaign Committee			12/15/2011	Legislative; Attorney-client	Email chain containing communications between Republican member of House of Delegates and staff and consultant/legal counsel advising House Republicans regarding redistricting and other matters.
000020	Calls	Chris Marston, Esq.	Kathy Roberts, Staff, Virginia House of Delegates			7/22/2011	Legislative	Email communication between staff and consultant advising House Republicans regarding congressional redistricting.
000025	Congressional Redistricting	Glenn Oder, Member, Virginia House of Delegates	Chris Marston, Esq.			6/1/2011	Legislative	Email communications between Republican member of House of Delegates and consultant advising House Republicans regarding congressional redistricting.
000026	Congressional Redistricting	Chris Marston, Esq.	Glenn Oder, Member, Virginia House of Delegates			6/1/2011	Legislative	Email communications between Republican member of House of Delegates and consultant advising House Republicans regarding congressional redistricting.
000031	Calls	Kathy Roberts, Staff, Virginia House of Delegates	Chris Marston, Esq.			7/22/2011	Legislative	Email communications between staff and consultant advising House Republicans regarding congressional redistricting.
000033	WP Blog - National GOP says Va. GOP to delay Redistricting; Richmond says Not so Fast	Tim Hugo, Member, Virginia House of Delegates	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.		6/2/2011	Legislative	Email communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
000035	Congressional Redistricting	Bill Janis, Member, Virginia House of Delegates	Chris Marston, Esq.			6/1/2011	Legislative	Email chain containing communications between Republican members of House of Delegates and consultant advising House Republicans regarding redistricting.
000037	Congressional Redistricting	Bill Janis, Member, Virginia House of Delegates	Chris Marston, Esq.			6/1/2011	Legislative	Email chain containing communications between Republican members of House of Delegates and consultant advising House Republicans regarding redistricting.
000039	Calls	Chris Marston, Esq.	Kathy Roberts, Staff, Virginia House of Delegates			7/22/2011	Legislative	Email communications between staff and consultant advising House Republicans regarding congressional redistricting.
000041	Congressional Redistricting	Paul Haughton, Staff, Virginia House Republican Campaign Committee	Chris Marston, Esq.			8/14/2011	Legislative	Email chain containing communications between Republican member of House of Delegates and staff and consultant advising House Republicans regarding redistricting.

000042	Congressional Redistricting	Glenn Oden, Member, Virginia House of Delegates	Chris Marston, Esq.			6/2/2011	Legislative	Email communications between Republican member of House of Delegates and consultant advising House Republicans regarding congressional redistricting.
000044	Library	Dan Leydorf	Chris Marston, Esq., Counsel to Virginia House Republican Campaign Committee			9/16/2011	Attorney-client; Work Product	Email communications between legal counsel to and representatives of Republican legislators regarding and in anticipation of redistricting litigation.
000051	Convention Financing	Leslie Rutledge, Esq., Counsel to Republican National Committee	Chris Marston, Esq., Counsel to Virginia House Republican Campaign Committee			9/14/2011	Attorney-client Common Interest	Email communications between legal counsel to Republican legislators regarding and in anticipation of redistricting litigation.
000053	Congratulations; Wrap Up	Paul Haughton, Staff, Virginia House Republican Campaign Committee	Chris Marston, Esq., Counsel to Virginia House Republican Campaign Committee			12/15/2011	Legislative; Attorney-client	Email chain containing communications between Republican member of House of Delegates and staff and consultant/legal counsel advising House Republicans regarding redistricting and other matters.
000055	Congressional Redistricting	Glenn Oder, Member, Virginia House of Delegates	Bill Janis, Member, Virginia House of Delegates	Chris Marston, Esq.		6/2/2011	Legislative	Email chain containing communications between Republican members of the House of Delegates and consultant advising House Republicans regarding redistricting.
000057	Congratulations: Wrap Up	Chris Marston, Esq., Counsel to Virginia House Republican Campaign Committee	Bill Howell, Speaker, Virginia House of Delegates			11/21/2011	Legislative; Attorney-client	Email communications between Republican member of House of Delegates and consultant/legal counsel advising House Republicans regarding redistricting and other matters.
000058	Congressional Redistricting	Chris Marston, Esq.	Bill Howell, Speaker, Virginia House of Delegates			8/14/2011	Legislative	Email communication between Republican member of House of Delegates and consultant advising House Republicans regarding congressional redistricting.

000059	WP Blog - National GOP says Va. GOP to delay Redistricting; Richmond says Not so Fast	Paul Nardo, Staff, Virginia House of Delegates	Tim Hugo, Member, Virginia House of Delegates; Chris Jones, Member, Virginia House of Delegates; Rob Bell, Member, Virginia House of Delegates; Bill Howell, Speaker, Virginia House of Delegates; Kirk Cox, Member, Virginia House of Delegates; Bill Janis, Member, Virginia House of Delegates, and Chris Marston, Esq.			6/2/2011	Legislative	Email communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
000060	WP Blog - National GOP says Va. GOP to delay Redistricting; Richmond says Not so Fast	Paul Nardo, Staff, Virginia House of Delegates	Tim Hugo, Member, Virginia House of Delegates; Chris Jones, Member, Virginia House of Delegates; Robert Bell, Member, Virginia House of Delegates; Bill Howell, Speaker, Virginia House of Delegates; Kirk Cox, Member, Virginia House of Delegates; Bill Janis, Member, Virginia House of Delegates; and Chris Marston, Esq.			6/2/2011	Legislative	Email communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.

000083	Washington Post	S. Chris Jones, Member, Virginia House of Delegates	Rob Bell, Member, Virginia House of Delegates; Chris Marston, Esq.; and G. Paul Nardo, Staff, Virginia House of Delegates			4/22/2011	Legislative	Email communication between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
000111	REMINDER - Caucus Meeting	G. Paul Nardo, Staff, Virginia House of Delegates	G. Paul Nardo, Staff, Virginia House of Delegates		Chris Marston, Esq.	4/27/2011	Legislative	Email communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
000114	IMPORTANT - Va. General Assembly Special Session I	G. Paul Nardo, Staff, Virginia House of Delegates	G. Paul Nardo, Staff, Virginia House of Delegates		Chris Marston, Esq.	5/13/2011	Legislative	Email chain containing communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
000121	REMINDER - Caucus Conf. Call	G. Paul Nardo, Staff, Virginia House of Delegates	G. Paul Nardo, Staff, Virginia House of Delegates		Chris Marston, Esq.	4/21/2011	Legislative	Email communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
000127	WVTF Public Radio	G. Paul Nardo, Staff, Virginia House of Delegates	David Nutter, Member, Virginia House of Delegates	Chris Marston, Esq.		4/19/2011	Legislative	Email communications between Republican member of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
000138	Litigation	Chris Marston, Esq., Counsel to Virginia House Republican Campaign Committee	Bill Howell, Speaker, Virginia House of Delegates; Bill Janis, Member, Virginia House of Delegates; Kirk Cox, Member, Virginia House of Delegates; Tim Hugo, Member, Virginia House of Delegates			4/19/2011	Attorney-client	Email communication between attorney and clients regarding redistricting.
000147	House & Senate meeting on Cong. Redistricting Bill (HB 5004)	G. Paul Nardo, Staff, Virginia House of Delegates	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.		5/12/2011	Legislative	Email communication between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.

000153	Litigation	Tim Hugo, Member, Virginia House of Delegates	Chris Marston, Esq., Counsel to Virginia House Republican Campaign Committee; Bill Howell, Speaker, Virginia House of Delegates; G. Paul Nardo, Staff, Virginia House of Delegates; Robert Bell, Member, Virginia House of Delegates; Bill Janis, Member, Virginia House of Delegates; Kirk Cox, Member, Virginia House of Delegates			4/19/2011	Attorney-client	Email communications between attorney and clients regarding redistricting.
000162	Governor's Mobile Number	G. Paul Nardo, Staff, Virginia House of Delegates	G. Paul Nardo, Staff, Virginia House of Delegates		Chris Marston, Esq.	4/21/2011	Legislative	Email chain containing communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
000168	Meeting and RTD's Tyler Whitley Inquiry	G. Paul Nardo, Staff, Virginia House of Delegates	Bill Howell, Speaker, Virginia House of Delegates; Bill Janis, Member, Virginia House of Delegates; Tim Hugo, Member, Virginia House of Delegates; Kirk Cox, Member, Virginia House of Delegates; Chris Jones, Member, Virginia House of Delegates	Chris Marston, Esq.		4/22/2011	Legislative	Email communication between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.

000210	Redistricting Update	Steve Ellis, Consultant, Virginia House of Delegates	Chris Marston, Esq., Counsel to Virginia House Republican Campaign Committee			4/22/2011	Legislative; Attorney-client	Email communications between consultants and legal counsel advising House Republicans regarding and reflecting legal advice concerning redistricting.
000245	Redistricting Update	Clark Bensen, Consultant to Republican Members of Virginia House of Delegates	Chris Marston, Esq., Counsel to Virginia House Republican Campaign Committee			4/19/2011	Attorney-client; Legislative	Email communications between consultants and legal counsel advising House Republicans regarding and reflecting legal advice concerning redistricting.
000272	Redistricting Update	Chris Marston, Esq., Counsel to Virginia House Republican Campaign Committee	Clark Bensen, Consultant to Republican Members of Virginia House of Delegates			4/19/2011	Attorney-client; Legislative	Email communications between consultants and legal counsel advising House Republicans regarding and reflecting legal advice concerning redistricting.
000291	Redistricting Update	Chris Marston, Esq., Counsel to Virginia House Republican Campaign Committee	John Morgan, Consultant, Virginia House of Delegates; Clark Bensen, Consultant to Republican Members of Virginia House of Delegates; Steve Ellis, Consultant to Republican Members of Virginia House of Delegates			4/19/2011	Attorney-client; Legislative	Email communication between consultants and legal counsel advising House Republicans regarding and reflecting legal advice concerning redistricting.
000306	Redistricting Update	Clark Bensen, Consultant to Republican Members of Virginia House of Delegates	Chris Marston, Esq., Counsel to Virginia House Republican Campaign Committee; John Morgan, Consultant to Republican Members of Virginia House of Delegates; Steve Ellis, Consultant to Republican Members of Virginia House of Delegates			4/19/2011	Attorney-client; Legislative	Email communications between consultants and legal counsel advising House Republicans regarding and reflecting legal advice concerning redistricting.

000329	Redistricting Update	Clark Bensen, Consultant to Republican Members of Virginia House of Delegates	Chris Marston, Esq., Counsel to Virginia House Republican Campaign Committee			4/19/2011	Attorney-client; Legislative	Email communications between consultants advising House Republicans regarding redistricting.
000333	Va Pilot Op-Ed Oppty	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.			4/13/2011	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
000340	Comments on Not Larry Sabato Blog	Paul Haughton, Staff, Virginia House Republican Campaign Committee	S. Chris Jones, Member, Virginia House of Delegates; Chris Marston, Esq.; Robert Bell, Member, Virginia House of Delegates			4/7/2011	Legislative	Email communication between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
000353	Va Pilot Op-Ed Oppty	Chris Marston, Esq.	G. Paul Nardo, Staff, Virginia House of Delegates			4/13/2011	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
000358	Stone Email	G. Paul Nardo, Staff, Virginia House of Delegates	Paul Haughton, Staff, Virginia House Republican Campaign Committee			4/11/2011	Legislative	Email chain containing communications between Republican member of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
000361	Greg Stone Response - A Few Tweaks	G. Paul Nardo, Staff, Virginia House of Delegates	Paul Haughton, Staff, House Republican Campaign Committee; Chris Marston, Esq.			4/11/2011	Legislative	Email communication between staff and consultant advising House Republicans regarding redistricting.
000364	Advice Redux	Jason Torchinsky, Esq., Counsel to Republican Members of the Virginia Senate	Chris Marston, Esq., Counsel to Virginia House Republican Campaign Committee			4/5/2011	Attorney-client Common Interest	Email communications between legal counsel to House Republicans and legal counsel to Senate Republicans regarding redistricting.
000366	Advice Redux	Jason Torchinsky, Esq., Counsel to Republican Members of the Virginia Senate	Chris Marston, Esq., Counsel to Virginia House Republican Campaign Committee			4/5/2011	Attorney-client Common Interest	Email communications between legal counsel to House Republicans and legal counsel to Senate Republicans regarding redistricting.
000373	Stone email	Paul Haughton, Staff, Virginia House Republican Campaign Committee	Bill Howell, Speaker, Virginia House of Delegates	Chris Marston, Esq.		4/11/2011	Legislative	Email communication between Republican member of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
000377	Do we have a suggested letter on redistricting for us to use??	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.			4/12/2011	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.

000385	Advice Redux	Jason Torchinsky, Esq., Counsel to Republican Members of the Virginia Senate	Chris Marston, Esq., Counsel to Virginia House Republican Campaign Committee			4/5/2011	Attorney-client Common Interest	Email communications between legal counsel to House Republicans and legal counsel to Senate Republicans regarding redistricting.
000390	Greg Stone Response - A Few Tweaks	Paul Haughton, Staff, Virginia House Republican Campaign Committee	G. Paul Nardo, Staff, Virginia House of Delegates; Chris Marston, Esq.			4/11/2011	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
000391	Status Update - House Redistricting	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.			4/7/2011	Legislative	Email communications between Republican member of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
000394	Advice redux	Chris Marston, Esq., Counsel to Virginia House Republican Campaign Committee	Jason Torchinsky, Esq., Counsel to Republican Members of the Virginia Senate			4/4/2011	Attorney-client Common Interest	Email communications between legal counsel to House Republicans and legal counsel to Senate Republicans regarding redistricting.
000408	FYI	Paul Haughton, Staff, Virginia House Republican Campaign Committee	Chris Marston, Esq.			4/2/2011	Legislative	Email communication between staff and consultant advising House Republicans regarding redistricting.
000409	FYI	Chris Marston, Esq.	Paul Haughton, Staff, Virginia House Republican Campaign Committee			4/2/2011	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
000410	Gov's Redistricting Commission Report	G. Paul Nardo, Staff, Virginia House of Delegates	Steven Jones, Staff, Independent Bipartisan Redistricting Commission	Chris Marston, Esq.		4/1/2011	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
000426	Governor's Redistricting Commission Report	Paul Haughton, Staff, Virginia House Republican Campaign Committee	Chris Marston, Esq.; G. Paul Nardo, Staff, Virginia House of Delegates			4/2/2011	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
000427	FYI	Paul Haughton, Staff, Virginia House Republican Campaign Committee	Chris Marston, Esq.			4/2/2011	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.

000445	Governor's Redistricting Commission Report	Chris Marston, Esq., Counsel to Virginia House Republican Campaign Committee	S. Chris Jones, Member, Virginia House of Delegates; Robert Bell, Member, Virginia House of Delegates; John Morgan, Consultant to Republican Members of Virginia House of Delegates; Clark Bensen, Consultant to Republican Members of Virginia House of Delegates; Dale Oldham, Esq., Counsel to Republican Members of Virginia House of Delegates		4/2/2011	Legislative; Attorney-client privilege	Email communication between legal counsel to House Republicans and consultants and attorneys advising clients regarding redistricting.
000472	Quotes on Redistricting	G. Paul Nardo, Staff, Virginia House of Delegates	S. Chris Jones, Member, Virginia House of Delegates; Robert Bell, Member, Virginia House of Delegates; Chris Marston, Esq.		4/4/2011	Legislative	Email communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
000475	FYI -- Morrissey Press Conference	G. Paul Nardo, Staff, Virginia House of Delegates	S. Chris Jones, Member, Virginia House of Delegates; Robert Bell, Member, Virginia House of Delegates; Chris Marston, Esq.		4/1/2011	Legislative	Email communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
000482	Great Job	Paul Haughton, Staff, Virginia House Republican Campaign Committee	Chris Marston, Esq.		3/30/2011	Legislative	Email communication between staff and consultant advising House Republicans regarding redistricting.
000486	Lawyers	Chris Marston, Esq., Counsel to Virginia House of Delegates	S. Chris Jones, Member, Virginia House of Delegates		3/31/2011	Attorney-client; Legislative	Email communication between legal counsel to Virginia House Republican Caucus and client regarding redistricting.

000487	Great Job	Chris Marston, Esq.	Paul Haughton, Staff, Virginia House Republican Campaign Committee			3/30/2011	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
000491	Conference Call	Chris Marston, Esq., Counsel to Virginia House Republican Campaign Committee	Dale Oldham, Esq., Counsel to Republican Members of Virginia House of Delegates			3/30/2011	Attorney-client	Email communications between legal counsel House Republicans regarding congressional redistricting.
000495	Reminder for your input on response	Chris Marston, Esq., Counsel to Virginia House Republican Campaign Committee	G. Paul Nardo, Staff, Virginia House of Delegates			3/29/2011	Attorney-client; Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
000498	Conference Call	Chris Marston, Esq., Counsel to Virginia House Republican Campaign Committee	Dale Oldham, Esq., Counsel to Republican Members of Virginia House of Delegates			3/30/2011	Attorney-client	Email communication between legal counsel to House Republicans regarding congressional redistricting.
000499	Conference Call	Dale Oldham, Esq., Counsel to Republican Members of Virginia House of Delegates	Chris Marston, Esq., Counsel to Virginia House Republican Campaign Committee			3/30/2011	Attorney-client	Email communication between legal counsel to House Republicans regarding congressional redistricting

000500	CONF. CALL on Cong. Redistricting Issues	G. Paul Nardo, Staff, Virginia House of Delegates	Bill Howell, Speaker, Virginia House of Delegates; Kirk Cox, Member, Virginia House of Delegates; S. Chris Jones, Member, Virginia House of Delegates; Robert Bell, Member, Virginia House of Delegates; Chris Marston, Esq., Counsel to Virginia House Republican Campaign Committee; Dale Oldham, Esq., Counsel to Republican Members of Virginia House of Delegates			3/30/2011	Attorney-client; Legislative	Email communication between Republican members of House of Delegates and staff and legal counsel advising House Republicans regarding congressional redistricting.
000517	Old Opening Remarks	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.			3/31/2011	Legislative	Email communication between staff and consultant advising House Republicans regarding redistricting.
000519	Conference Call	Chris Marston, Esq., Counsel to Virginia House Republican Campaign Committee	Dale Oldham, Esq., Counsel to Republican Members of Virginia House of Delegates			3/30/2011	Attorney-client	Email communication between legal counsel to House Republicans regarding congressional redistricting.
000520	Reminder for your input for response	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq., Counsel to Virginia House Republican Campaign Committee			3/29/2011	Attorney-client; Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
000524	USE THIS VERSION -- Remarks	G. Paul Nardo, Staff, Virginia House of Delegates	S. Chris Jones, Member, Virginia House of Delegates	Chris Marston, Esq.		3/31/2011	Legislative	Email communications between Republican member of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
000525	Old Opening Remarks	Chris Marston, Esq.	G. Paul Nardo, Staff, Virginia House of Delegates			3/31/2011	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.

000526	House-Senate-Gov Meeting with AG	Chris Marston, Esq., Counsel to Virginia House Republican Campaign Committee	Steve Newman, Member, Virginia Senate			3/18/2011	Attorney-client Common Interest; Legislative	Email communication between legal counsel to the House Republicans and a Republican member of the Virginia Senate regarding redistricting.
000533	Letter from the Dem Caucus	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.			3/23/2011	Legislative	Email chain containing communications between Republican members of House of Delegates and staff consultant advising House Republicans regarding redistricting.
000538	current draft of Redistricting preamble & map drawing directions	Cameron Quinn	Chris Marston, Esq.			3/20/2011	Legislative	Email communications between consultant advising House Republicans and representative of the Governor's Bipartisan Redistricting Commission regarding redistricting.
000540	Letter from the Dem Caucus	Chris Marston, Esq.	G. Paul Nardo, Staff, Virginia House of Delegates			3/23/2011	Legislative	Email chain containing communications between Republican members of House of Delegates and staff consultant advising House Republicans regarding redistricting.
000554	current draft of Redistricting preamble & map-drawing directions	Cameron Quinn	Cameron Quinn	Chris Marston, Esq.		3/20/2011	Legislative	Email communications between consultant advising House Republicans and representative of the Governor's Bipartisan Redistricting Commission regarding redistricting.
000555	Response to Delegate	Susan, Staff, Virginia House of Delegates	Chris Marston, Esq.			3/23/2011	Legislative	Email communications between consultant advising House Republicans and staff and members of House of Delegates regarding redistricting. Email communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
000561	Re:	Chris Marston, Esq.	Chris Peace, Member, Virginia House of Delegates			3/24/2011	Legislative; Attorney-client	Email communications between Republican member of House of Delegates and consultant/legal counsel advising House Republicans regarding redistricting.
000563	redistricting	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq., Counsel to Virginia House Republican Campaign Committee			3/28/2011	Attorney-client; Legislative	Email communication between legal counsel to Virginia House Republican Caucus and client regarding redistricting.
000565	Letter from the Dem Caucus	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.			3/24/2011	Legislative	Email chain containing communications between Republican members of House of Delegates and staff consultant advising House Republicans regarding redistricting.
000569	Letter for Delegate	Chris Marston, Esq.	Karen Stuber, Staff, Virginia House of Delegates			3/24/2011	Legislative	Email communications between consultant advising House Republicans and staff of House of Delegates regarding redistricting.
000571	Delegate Response to Delegate	G. Paul Nardo, Staff, Virginia House of Delegates	Bruce Jamerson, Staff, Virginia House of Delegates	Chris Marston, Esq.		3/24/2011	Legislative	Email communication between staff of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
000572	Re:	Chris Marston, Esq.	Chris Peace, Member, Virginia House of Delegates			3/24/2011	Legislative; Attorney-client	Email communications between Republican member of House of Delegates and consultant/legal counsel advising House Republicans regarding redistricting.
000574	Redistricting document - corrected	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.			3/17/2011	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.

000575	current draft of Redistricting preamble & map-drawing directions	Chris Marston, Esq.	Cameron Quinn			3/20/2011	Legislative	Email communications between consultant advising House Republicans and representative of the Governor's Bipartisan Redistricting Commission regarding redistricting.
000582	Letter from the Dem Caucus	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.			3/23/2011	Legislative	Email chain containing communications between Republican members of House of Delegates and staff consultant advising House Republicans regarding redistricting.
000584	Redistricting	Chris Peace, Member, Virginia House of Delegates	Chris Marston, Esq.; S. Chris Jones, Member, Virginia House of Delegates			3/24/2011	Legislative	Email communications between Republican members of House of Delegates and consultant advising House Republicans regarding redistricting.
000586	RE:	Chris Peace, Member, Virginia House of Delegates	Chris Marston, Esq.			3/24/2011	Legislative; Attorney-client	Email communications between Republican member of House of Delegates and consultant/legal counsel advising House Republicans regarding redistricting.
000598	Bruce Text	Chris Marston, Esq.	G. Paul Nardo, Staff, Virginia House of Delegates			3/24/2011	Legislative	Email communication between consultant and staff advising House Republicans regarding redistricting.
000606	Re:	Chris Marston, Esq.	Chris Peace, Member, Virginia House of Delegates			3/24/2011	Legislative; Attorney-client	Email communications between Republican member of House of Delegates and consultant/legal counsel advising House Republicans regarding redistricting.
000608	Response to Delegate	Chris Marston, Esq.	S. Chris Jones, Member, Virginia House of Delegates			3/23/2011	Legislative	Email communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
000609	Re:	Chris Marston, Esq.	Chris Peace, Member, Virginia House of Delegates			3/24/2011	Legislative; Attorney-client	Email communication between Republican member of House of Delegates and consultant/legal counsel advising House Republicans regarding redistricting.
000610	Re:	Chris Peace, Member, Virginia House of Delegates	Chris Marston, Esq.			3/24/2011	Legislative; Attorney-client	Email communications between Republican member of House of Delegates and consultant/legal counsel advising House Republicans regarding redistricting.
000612	House-Senate-Gov Meeting with AG	Chris Marston, Esq., Counsel to Virginia House Republican Campaign Committee	Steve Newman, Member, Virginia Senate			3/21/2011	Attorney-client Common Interest; Legislative	Email communications between legal counsel to the House Republicans and a Republican member of the Virginia Senate regarding redistricting.
000614	Re:	Chris Peace, Member, Virginia House of Delegates	Chris Marston, Esq.			3/24/2011	Legislative; Attorney-client	Email communications between Republican member of House of Delegates and consultant/legal counsel advising House Republicans regarding redistricting.
000617	Technology allows citizens to be part of redistricting process - USATODAY.com	Susan, Staff, Virginia House of Delegates	G. Paul Nardo, Staff, Virginia House of Delegates; John Morgan, Consultant to Republican Members of Virginia House of Delegates; Chris Marston, Esq.			3/21/2011	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.

000618	Re:	Chris Peace, Member, Virginia House of Delegates	Chris Marston, Esq.			3/24/2011	Legislative; Attorney-client	Email communications between Republican member of House of Delegates and consultant/legal counsel advising House Republicans regarding redistricting.
000621	Letter from the Dem Caucus	G. Paul Nardo, Staff, Virginia House of Delegates	Mark Cole, Member, Virginia House of Delegates	Chris Marston, Esq.		3/23/2011	Legislative	Email chain containing communications between Republican members of House of Delegates and staff consultant advising House Republicans regarding redistricting.
000622	Technology allows citizens to be part of redistricting process - USATODAY.com	G. Paul Nardo, Staff, Virginia House of Delegates	Susan, Staff, Virginia House of Delegates	Chris Marston, Esq.		3/21/2011	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
000624	House-Senate-Gov Meeting with AG	Steve Newman, Member, Virginia Senate	Chris Marston, Esq., Counsel to Virginia House Republican Campaign Committee			3/21/2011	Attorney-client Common Interest; Legislative	Email communications between legal counsel to the House Republicans and a Republican member of the Virginia Senate regarding redistricting.
000629	Re:	Chris Marston, Esq.	Chris Peace, Member, Virginia House of Delegates			3/24/2011	Legislative; Attorney-client	Email communications between Republican member of House of Delegates and consultant/legal counsel advising House Republicans regarding redistricting.
000633	Letter from the Dem Caucus	Chris Marston, Esq.	G. Paul Nardo, Staff, Virginia House of Delegates			3/23/2011	Legislative	Email chain containing communications between Republican members of House of Delegates and staff consultant advising House Republicans regarding redistricting.
000634	Congressional	Chris Marston, Esq., Counsel to Virginia House Republican Campaign Committee	Dale Oldham, Esq., Counsel to Republican Members of Virginia House of Delegates			3/11/2011	Attorney-client	Email communications between legal counsel to House Republicans regarding congressional redistricting.
000656	NOTES from Governor Redistricting Panel Meeting	Chris Marston, Esq.	G. Paul Nardo, Staff, Virginia House of Delegates			3/8/2011	Legislative	Email communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
000671	NOTES	Katharine Kruk, Staff, Virginia House of Delegates	Chris Marston, Esq.			3/8/2011	Legislative	Email communication between staff and consultant advising House Republicans regarding redistricting.
000688	Redistricting Public Hearing	G. Paul Nardo, Staff, Virginia House of Delegates	Scott Maddrea, Staff, Virginia House of Delegates	Chris Marston, Esq.		3/17/2011	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
000711	Redistricting Hearings - Locations	G. Paul Nardo, Staff, Virginia House of Delegates	S. Chris Jones, Member, Virginia House of Delegates	Chris Marston, Esq.		3/8/2011	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
000746	NOTES from Governor Redistricting Panel Meeting	G. Paul Nardo, Staff, Virginia House of Delegates	S. Chris Jones, Member, Virginia House of Delegates; Robert Bell, Member, Virginia House of Delegates	Chris Marston, Esq.		3/8/2011	Legislative	Email communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.

000766	Redistricting Procedural Resolution DRAFT	Chris Marston, Esq.	G. Paul Nardo, Staff, Virginia House of Delegates			2/21/2011	Legislative; Attorney-client Common Interest	Email chain containing communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
000770	Post-Session Schedule	Bill Flanagan, Staff, Virginia House of Delegates	Chris Marston, Esq.			2/28/2011	Legislative	Email chain containing communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
000772	Post-Session Schedule	Chris Marston, Esq.	Kirk Cox, Member, Virginia House of Delegates			2/27/2011	Legislative	Email communication between Republican member of House of Delegates and consultant advising House Republicans regarding redistricting.
000775	Response to Delegates Letter on Redistricting	G. Paul Nardo, Staff, Virginia House of Delegates	Mark Cole, Member, Virginia House of Delegates	Chris Marston, Esq.		3/2/2011	Legislative	Email communication between Republican member of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
000776	Post-Session Schedule	Bill Flanagan, Staff, Virginia House of Delegates	Chris Marston, Esq.			2/27/2011	Legislative	Email chain containing communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
000780	Response to Delegate Process Inquiries	Chris Marston, Esq.	Dale Oldham, Esq., Counsel to Republican Members of Virginia House of Delegates			3/2/2011	Legislative; Attorney-client	Email chain containing communications between legal counsel advising House Republicans and between Republican members of House of Delegates and staff, consultant, and legal counsel advising House Republicans regarding redistricting.
000783	DOJ v. District Court Article	Chris Marston, Esq.	Bill Howell, Speaker, Virginia House of Delegates; S. Chris Jones, Member, Virginia House of Delegates; Robert Bell, Member, Virginia House of Delegates			2/23/2011	Legislative	Email communication between Republican members of House of Delegates and consultant advising House Republicans regarding redistricting.
000787	Letters - Delegate Inquiry and Responses on Redistricting	G. Paul Nardo, Staff, Virginia House of Delegates	All Members of Virginia House of Delegates	Chris Marston, Esq.		3/4/2011	Legislative	Email communication between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
000788	Feedback on Letter	Chris Marston, Esq., Counsel to Virginia House Republican Campaign Committee	Dale Oldham, Esq., Counsel to Republican Members of Virginia House of Delegates			3/2/2011	Attorney-client	Email communication between legal counsel to House Republicans regarding redistricting.
000789	Post-Session Schedule	Chris Marston, Esq.	Bill Flanagan, Staff, Virginia House of Delegates			3/1/2011	Legislative	Email chain containing communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
000792	Post-Session Schedule	Bill Flanagan, Staff, Virginia House of Delegates	Chris Marston, Esq.			3/1/2011	Legislative	Email chain containing communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.

B000001	Post-Session Schedule	Bill Flanagan, Staff, Virginia House of Delegates	Chris Marston, Esq.			3/1/2011	Legislative	Email chain containing communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B000006	gov redistricting commission	G. Paul Nardo, Staff, Virginia House of Delegates	David Nutter, Member, Virginia House of Delegates	Chris Marston, Esq.		3/5/2011	Legislative	Email communications between Republican member of House of Delegates and staff consultant advising House Republicans regarding redistricting.
B000007	TIME SENSITIVE - Response to Delegate Redistricting Process Inquiries	Chris Marston, Esq.	G. Paul Nardo, Staff, Virginia House of Delegates			3/2/2011	Attorney-client; Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting and seeking legal advice.
B000009	Quick Check-In Call	Chris Marston, Esq.	Kirk Cox, Member, Virginia House of Delegates			3/1/2011	Legislative	Email communication between Republican member of House of Delegates and consultant advising House Republicans regarding redistricting.
B000010	Post-Session Schedule	Bill Flanagan, Staff, Virginia House of Delegates	Chris Marston, Esq.			3/1/2011	Legislative	Email chain containing communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B000012	TIME SENSITIVE - Response to Delegate Redistricting Process Inquiries	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.			3/2/2011	Legislative; Attorney-client	Email communications between staff and consultant advising House Republicans regarding redistricting and seeking legal advice.
B000015	Quick Check-in Call	Chris Marston, Esq.	Bill Flanagan, Staff, Virginia House of Delegates			3/1/2011	Legislative	Email communications between Republican member of House of Delegates and consultant advising House Republicans regarding redistricting.
B000016	TIME SENSITIVE - Response to Delegate Redistricting Process Inquiries	Chris Marston, Esq.	Dale Oldham, Esq., Counsel to Republican Members of Virginia House of Delegates			3/2/2011	Attorney-client; Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting and seeking legal advice.
B000018	Response to Delegate Process Inquiries	Chris Marston, Esq.	G. Paul Nardo, Staff, Virginia House of Delegates S. Chris Jones, Member, Virginia House of Delegates Robert Bell, Member, House of Delegates Dale Oldham, Esq., Counsel to Virginia House of Delegates			2/26/2011	Legislative; Attorney-client	Email communication between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B000019	Post-Session Schedule	Bill Flanagan, Staff, Virginia House of Delegates	Chris Marston, Esq.			3/1/2011	Legislative	Email chain containing communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B000021	Quick Check-In Call	Kirk Cox, Member, Virginia House of Delegates	Chris Marston, Esq.			3/1/2011	Legislative	Email communications between Republican member of House of Delegates and consultant advising House Republicans regarding redistricting.

B000022	Quick Check-In Call	Bill Flanagan, Staff, Virginia House of Delegates	Chris Marston, Esq.			3/1/2011	Legislative	Email communications between Republican member of House of Delegates and consultant advising House Republicans regarding redistricting.
B000024	Redistricting Procedural Resolution DRAFT -- Attached is LD 11105509D.doc	G. Paul Nardo, Staff, Virginia House of Delegates	Jeff Finch, Staff, Virginia House of Delegates	Chris Marston, Esq.		2/21/2011	Legislative	Email chain containing communications between Republican member of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B000025	TIME SENSITIVE - Response to Delegate Redistricting Process Inquiries	Dale Oldham, Esq., Counsel to Republican Members of Virginia House of Delegates	Chris Marston, Esq.			3/2/2011	Attorney-client; Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting and reflecting legal advice.
B000027	Post-Session Schedule	Chris Marston, Esq.	Paul Haughton, Staff, Virginia House Republican Campaign Committee			2/27/2011	Legislative	Email chain containing communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B000029	Post-Session Schedule	Chris Marston, Esq.	Bill Flanagan, Staff, Virginia House of Delegates			3/1/2011	Legislative	Email chain containing communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B000031	Post-Session Schedule	Chris Marston, Esq.	G. Paul Nardo, Staff, Virginia House of Delegates			2/28/2011	Legislative	Email chain containing communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B000035	Redistricting and the Justice Department	Jason Torchinsky, Esq., Counsel to Republican Members of the Virginia Senate	Jasen Eige, Esq., Counsel to Virginia Governor; Jill Holtzman, Esq., Member, Virginia Senate; Chris Marston, Esq., Counsel to House Republican Campaign Committee			2/23/2011	Attorney-client Common Interest	Email communication between legal counsel advising House Republicans, Senate Republicans, and the Governor and client regarding redistricting.
B000045	Redist. Call	Jasen Eige, Esq., Counsel to Virginia Governor	Chris Marston, Esq., Counsel to Virginia House Republican Campaign Committee			2/25/2011	Attorney-client Common Interest	Email chain containing communications between legal counsel advising House Republicans, Senate Republicans, and the Governor regarding redistricting.
B000047	IMPORTANT: Conference Call	Chris Marston, Esq., Counsel to Virginia House Republican Campaign Committee	Dale Oldham, Counsel to Republican Members of Virginia House of Delegates			2/8/2011	Attorney-client	Email communication between legal counsel to House Republicans regarding redistricting

B000053	FYI - Thinking about when to have Joint Rules meet next week, and the Redistricting Procedural Resolution	G. Paul Nardo, Staff, Virginia House of Delegates	Kirk Cox, Member, Virginia House of Delegates S. Chris Jones, Member, Virginia House of Delegates Robert Bell, Member, Virginia House of Delegates	Chris Marston, Esq.		2/16/2011	Legislative	Email communication between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B000055	REMINDER - Dates to Avoid in April - Redistricting Special Session in Mind	G. Paul Nardo, Staff, Virginia House of Delegates	G. Paul Nardo, Staff, Virginia House of Delegates		Chris Marston, Esq.	2/18/2011	Legislative	Email communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B000070	Sunday Meeting	Chris Marston, Esq.	G. Paul Nardo, Staff, Virginia House of Delegates			2/18/2011	Attorney-client; Legislative	Email communication between staff and consultant advising House Republicans regarding redistricting.
B000071	Redist. Call	Chris Marston, Esq.	Jason Torchinsky, Esq., Counsel to Republican Members of the Virginia Senate			2/19/2011	Legislative; Attorney-client Common Interest	Email communications between legal counsel to House Republicans and legal counsel to Senate Republicans regarding redistricting.
B000078	Pls call	Paul Haughton, Staff, Virginia House Republican Campaign Committee	Chris Marston, Esq.			2/16/2011	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B000084	Redist. Call	Jason Torchinsky, Esq., Counsel to Republican Members of the Virginia Senate	Jasen Eige, Esq., Counsel to Virginia Governor	Chris Marston, Esq., Counsel to Virginia House Republican Campaign Committee		2/18/2011	Attorney-client Common Interest	Email chain containing communications between legal counsel advising House Republicans, Senate Republicans, and the Governor regarding redistricting.
B000093	Amdt to HB 1507	Jeff Palmore, Esq., Counsel to Virginia Governor	G. Paul Nardo, Staff, Virginia House of Delegates; Chris Marston, Esq.			2/9/2011	Legislative	Email communication between staff of House of Delegates, legal counsel to House Republicans, and legal counsel to the Governor regarding redistricting.
B000096	Sunday Meeting	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.			2/18/2011	Attorney-client Common Interest; Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.

B000105	IMPORTANT: Conference Call	Dale Oldham, Esq., Counsel to Republican Members of Virginia House of Delegates	Chris Marston, Esq., Counsel to Virginia House Republican Campaign Committee			2/9/2011	Attorney-client	Email communication between legal counsel to House Republicans regarding redistricting.
B000108	Redist. Call	Jasen Eige, Esq., Counsel to Virginia Governor	Jason Torchinsky, Counsel to Republican Members of the Virginia Senate; Chris Marston, Esq., Counsel to House Republican Campaign Committee			2/18/2011	Attorney-client Common Interest	Email chain containing communications between legal counsel advising House Republicans, Senate Republicans, and the Governor regarding redistricting.
B000133	Redist. Call	Jasen Eige, Esq., Counsel to Virginia Governor	Chris Marston, Esq., Counsel to Virginia House Republican Campaign Committee			2/25/2011	Attorney-client Common Interest	Email chain containing communications between legal counsel advising House Republicans, Senate Republicans, and the Governor regarding redistricting.
B000142	DOJ Memo	John Morgan, Consultant to Republican Members of Virginia House of Delegates	Chris Marston, Esq.			2/16/2011	Legislative	Email communications between consultants advising House Republicans regarding redistricting.
B000144	Talking Points	Chris Marston, Esq., Counsel to Virginia House Republican Campaign Committee	G. Paul Nardo, Staff, Virginia House of Delegates; Katharine Kruk, Staff, Virginia House of Delegates			1/31/2011	Attorney-client Legislative	Email communication between staff advising House Republicans and legal counsel to the Virginia House Republican Caucus regarding redistricting.
B000149	REMINDER - Meeting with Governor	Chris Marston, Esq.	G. Paul Nardo, Staff, Virginia House of Delegates			1/28/2011	Legislative	Email communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B000152	Special Session Q	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq., Counsel to Virginia House Republican Campaign Committee			1/24/2011	Attorney-client Legislative	Email communication between legal counsel to the Virginia House Republican Caucus and staff advising House Republicans regarding redistricting legislation.

B000162	Dr. Holsworth and Governor's Bipartisan Redistricting Panel	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.; Bill Howell, Speaker, Virginia House of Delegates; Kirk Cox, Member, Virginia House of Delegates; S. Chris Jones, Member, Virginia House of Delegates; Rob Bell, Member, Virginia House of Delegates; Paul Haughton, Staff, Virginia House Republican Campaign Committee			1/19/2011	Legislative	Email chain containing communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B000167	Approved Delegate News Release on Census Data for Redistricting	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.; Mark Cole, Member, Virginia House of Delegates			2/3/2011	Legislative	Email communication between Republican member of House of Delegates and consultant and staff advising House Republicans regarding redistricting.
B000173	Dr. Holsworth and Governor's Bipartisan Redistricting Panel	Chris Marston, Esq., Counsel to Virginia House Republican Campaign Committee	Paul Haughton, Staff, Virginia House Republican Campaign Committee			1/19/2011	Attorney-client; Legislative	Email communication between legal counsel to and staff of House Republicans reflecting legal advice regarding redistricting.
B000187	Talking Points	Chris Marston, Esq.	Jeff Ryer, Staff, Virginia House of Delegates			1/31/2011	Attorney-client; Legislative	Email communications between staff advising House Republicans and legal counsel to the Virginia House Republican Caucus regarding redistricting.
B000191	Delegate meeting	Paul Haughton, Staff, Virginia House Republican Campaign Committee	Chris Marston, Esq.			1/23/2011	Legislative	Email communication between staff and consultant advising House Republicans regarding redistricting..
B000192	Special Session Q	Chris Marston, Esq., Counsel to Virginia House Republican Campaign Committee	G. Paul Nardo, Staff, Virginia House of Delegates			1/24/2011	Attorney-client Legislative	Email communication between legal counsel to the Virginia House Republican Caucus and staff advising House Republicans regarding redistricting legislation.
B000200	Today's Daily Press	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.			1/16/2011	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting legislation.

B000213	REMINDER - Meeting with Governor	G. Paul Nardo, Staff, Virginia House of Delegates	Bill Howell, Speaker, Virginia House of Delegates; Kirk Cox, Member, Virginia House of Delegates; Tim Hugo, Member, Virginia House of Delegates; Bill Janis, Member, Virginia House of Delegates; Chris Marston, Esq.			1/28/2011	Legislative	Email communication between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B000215	Special Session Q	Chris Marston, Esq., Counsel to Virginia House Republican Campaign Committee	G. Paul Nardo, Staff, Virginia House of Delegates			1/24/2011	Attorney-client Legislative	Email communication between legal counsel to the Virginia House Republican Caucus and staff advising House Republicans regarding redistricting legislation.
B000217	Dr. Holsworth and Governor's Bipartisan Redistricting Panel	Chris Marston, Esq., Counsel to Virginia House Republican Campaign Committee	G. Paul Nardo, Staff, Virginia House of Delegates			1/19/2011	Attorney-client; Legislative	Email communication between legal counsel to and staff of House Republicans reflecting legal advice regarding redistricting.
B000223	Today's Daily Press	Paul Haughton, Staff, Virginia House Republican Campaign Committee	G. Paul Nardo, Staff, Virginia House of Delegates; Chris Marston, Esq.			1/16/2011	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting legislation.
B000227	Redistricting Info	Chris Marston, Esq.	Bill Howell, Speaker, Virginia House of Delegates			1/22/2011	Legislative	Email communications between Republican member of House of Delegates and consultant advising House Republicans regarding redistricting.
B000230	Census 2010 Data	Chris Marston, Esq.	Mark Cole, Member, Virginia House of Delegates			2/3/2011	Legislative	Email communication between Republican member of House of Delegates and consultant advising House Republicans regarding redistricting.
B000234	College teams compete to redraw Va political map	Paul Haughton, Staff, Virginia House Republican Campaign Committee	G. Paul Nardo, Staff, Virginia House of Delegates; Chris Marston, Esq.			1/20/2011	Legislative	Email communication between staff and consultant advising House Republicans regarding redistricting.
B000235	Delegate meeting	Chris Marston, Esq.	Paul Haughton, Staff, Virginia House Republican Campaign Committee			1/23/2011	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.

B000239	Special Session Q	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq., Counsel to Virginia House Republican Campaign Committee			1/24/2011	Attorney-client Legislative	Email communication between legal counsel to the Virginia House Republican Caucus and staff advising House Republicans regarding redistricting legislation.
B000243	Special Session Q	Chris Marston, Esq., Counsel to Virginia House Republican Campaign Committee	G. Paul Nardo, Staff, Virginia House of Delegates			1/22/2011	Attorney-client Legislative	Email communication between legal counsel to the Virginia House Republican Caucus and staff advising House Republicans regarding redistricting legislation.
B000244	Delegate meeting	Paul Haughton, Staff, Virginia House Republican Campaign Committee	Chris Marston, Esq.			1/23/2011	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B000250	Meeting with Delegate	Paul Haughton, Staff, Virginia House Republican Campaign Committee	Robert Bell, Member, Virginia House of Delegates; S. Chris Jones, Member, Virginia House of Delegates; Chris Marston, Esq.			1/25/2011	Legislative	Email communication between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B000253	Today's Daily Press	G. Paul Nardo, Staff, Virginia House of Delegates	Paul Haughton, Staff, Virginia House Republican Campaign Committee	Chris Marston, Esq.		1/16/2011	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting legislation.
B000257	Special Session Q	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq., Counsel to Virginia House Republican Campaign Committee			1/24/2011	Attorney-client Legislative	Email communication between legal counsel to the Virginia House Republican Caucus and staff advising House Republicans regarding redistricting legislation.
B000263	Dr. Holsworth and Governor's Bipartisan Redistricting Panel	Paul Haughton, Staff, Virginia House Republican Campaign Committee	Chris Marston, Esq., Counsel to Virginia House Republican Campaign Committee			1/19/2011	Attorney-client; Legislative	Email communication between legal counsel to and staff of House Republicans reflecting legal advice regarding redistricting.
B000269	Talking Points	Jeff Ryer, Staff, Virginia Senate	Chris Marston, Esq.			2/2/2011	Attorney-client; Legislative	Email communications between staff advising House Republicans and legal counsel to the Virginia House Republican Caucus regarding redistricting.
B000274	Redistricting Contract Authority	Chris Marston, Esq.	G. Paul Nardo, Staff, Virginia House of Delegates			1/7/2011	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.

B000279	Redistricting	Paul Haughton, Staff, Virginia House Republican Campaign Committee	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.		12/28/2010	Legislative	Email chain containing communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B000286	Atkinson Update; RPV	Chris Marston, Esq.	Paul Haughton, Staff, House Republican Campaign Committee			1/7/2011	Legislative	Email communication between staff and consultant advising House Republicans regarding redistricting.
B000287	"Ethnic Community Seminar"	Chris Marston, Esq.	David Albo, Member, Virginia House of Delegates			1/3/2011	Attorney-client; Legislative	Email communications between consultant advising House Republicans and Republican member of the House of Delegates regarding redistricting.
B000294	"Ethnic Community Seminar"	David Albo, Member, Virginia House of Delegates	Chris Marston, Esq.			1/3/2011	Attorney-client; Legislative	Email communications between consultant advising House Republicans and Republican member of the House of Delegates regarding redistricting.
B000298	No Gov Redistricting Commission Announcement Tomorrow	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.			12/20/2010	Legislative	Email chain containing communications between Republican members of the House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B000304	Redistricting	Chris Marston, Esq.	Paul Haughton, Staff, House Republican Campaign Committee			12/29/2010	Legislative	Email communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B000316	Next Week	John Morgan, Consultant to Republican Members of Virginia House of Delegates	Chris Marston, Esq.			1/12/2011	Legislative	Email communications between consultants advising House Republicans regarding redistricting.
B000324	@Redistricting	Chris Marston, Esq.	Chris Marston, Esq.			12/29/2010	Legislative	Email chain containing communications between Republican member of House of Delegates and consultant advising House Republicans regarding redistricting.
B000333	No Gov Redistricting Commission Announcement Tomorrow	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.			12/20/2010	Legislative	Email chain containing communications between Republican members of the House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B000340	JRC Follow Up	Chris Marston, Esq.	S. Chris Jones, Member, Virginia House of Delegates			12/17/2010	Legislative	Email communication between Republican member of House of Delegates and consultant advising House Republicans regarding redistricting.
B000353	Constitution on Redistricting	Chris Marston, Esq., Counsel to Virginia House Republican Campaign Committee	Jackson Miller, Member, Virginia House of Delegates			12/23/2010	Attorney-client; Legislative	Email communication between Republican member of House of Delegates and legal counsel to House Republicans regarding redistricting.
B000355	Atkinson Update; RPV	Paul Haughton, Staff, House Republican Campaign Committee	Chris Marston, Esq.			1/7/2011	Legislative	Email communication between staff and consultant advising House Republicans regarding redistricting.
B000359	Redistricting Background	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.			1/7/2011	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.

B000364	Redistricting Contract Authority	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.			1/7/2011	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B000369	Redistricting Meeting	Chris Marston, Esq.	George Faatz, Staff, Virginia House of Delegates			1/3/2011	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B000371	Redistricting Background	Chris Marston, Esq.	G. Paul Nardo, Staff, Virginia House of Delegates			1/7/2011	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B000373	Atkinson Update; RPV	Chris Marston, Esq.	Paul Haughton, Staff, House Republican Campaign Committee			1/7/2011	Attorney-client; Legislative	Email communication between staff and consultant advising House Republicans regarding and reflecting legal counsel's advice concerning redistricting.
B000378	No Gov Redistricting Commission Announcement Tomorrow	Chris Marston, Esq.	G. Paul Nardo, Staff, Virginia House of Delegates			12/20/2010	Legislative	Email chain containing communications between Republican members of the House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B000394	Redistricting Meeting	George Faatz, Staff, Virginia House of Delegates	Chris Marston, Esq.			1/3/2011	Legislative	Email communication between staff and consultant advising House Republicans regarding redistricting.
B000408	P&E Redistricting Hearing(s)	Chris Marston, Esq.	G. Paul Nardo, Staff, Virginia House of Delegates			12/15/2010	Legislative	Email communication between staff and consultant advising House Republicans regarding redistricting.
B000418	Agenda for Friday's Joint Reappointment Committee	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.			12/14/2010	Legislative	Email communications between staff and consultant advising the House Republicans regarding redistricting.
B000420	Agenda for Friday's Joint Reappointment Committee	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.			12/14/2010	Legislative	Email communications between staff and consultant advising the House Republicans regarding redistricting.
B000428	Joint Reapportionment Committee Meeting	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.			12/15/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B000430	Mtg at Cabin	G. Paul Nardo, Staff, Virginia House of Delegates	Bill Howell, Speaker, Virginia House of Delegates; Paul Haughton, Staff, House Republican Campaign Committee; Chris Marston, Esq; G. Paul Nardo, Staff, Virginia House of Delegates			12/17/2010	Legislative	Email communication between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B000435	Friday's Redistricting-Related Hearings and Meetings	Rob Bell, Member, Virginia House of Delegates	Chris Marston, Esq.			12/16/2010	Legislative	Email chain containing communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.

B000438	Follow-up on Redistricting	Chris Marston, Esq.	Jasen Eige, Esq., Counsel to Virginia Governor			12/11/2010	Attorney-client Common Interest	Email communication between legal counsel to House Republicans and legal counsel to the Governor regarding redistricting.
B000439	STAFF QUESTIONS -- Agenda for Friday's Joint Reappointment Committee	G. Paul Nardo, Staff, Virginia House of Delegates	Mark Cole, Member, Virginia House of Delegates	Chris Marston, Esq.		12/15/2010	Legislative	Email communications between staff of General Assembly and staff and consultant advising House Republicans regarding redistricting.
B000443	Friday Meetings	Dave Albo, Member, Virginia House of Delegates	Chris Marston, Esq.			12/15/2010	Legislative	Email communications between Republican member of House of Delegates and consultant advising House Republicans regarding redistricting.
B000463	Agenda for Friday's Joint Reappointment Committee	G. Paul Nardo, Staff, Virginia House of Delegates	Jack Austin, Staff, Virginia Division of Legislative Services	Chris Marston, Esq.		12/14/2010	Legislative	Email communications between staff of General Assembly and consultant and staff advising House Republicans regarding redistricting.
B000468	Friday's Redistricting-Related Hearings and Meetings	Chris Marston, Esq.	Dave Albo, Member, Virginia House of Delegates; Rob Bell, Member, Virginia House of Delegates; S. Chris Jones, Member, Virginia House of Delegates; Jackson Miller, Member, Virginia House of Delegates			12/15/2010	Legislative	Email communication between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B000472	STAFF QUESTION -- Agenda for Friday's Joint Reapportionment Committee	G. Paul Nardo, Staff, Virginia House of Delegates	Jack Austin, Staff, Virginia Division of Legislative Services; Mary Spain, Staff, Virginia House of Delegates	Chris Marston, Esq.		12/15/2010	Legislative	Email communications between staff of General Assembly and staff and consultant advising House Republicans regarding redistricting.
B000483	Follow-Up on Redistricting	Jasen Eige, Esq., Counsel to Virginia Governor	Chris Marston, Esq., Counsel to Virginia House Republican Campaign Committee			12/11/2010	Attorney-client Common Interest	Email communication between legal counsel to House Republicans and legal counsel to the Governor regarding redistricting.
B000491	Friday meetings	Dave Albo, Member, Virginia House of Delegates	Chris Marston, Esq.			12/15/2010	Legislative	Email communications between Republican member of House of Delegates and consultant advising House Republicans regarding redistricting.
B000493	Friday meetings	Chris Marston, Esq.	Dave Albo, Member, Virginia House of Delegates			12/15/2010	Legislative	Email communications between Republican member of House of Delegates and consultant advising House Republicans regarding redistricting.

B000495	Friday meetings	Chris Marston, Esq.	Dave Albo, Member, Virginia House of Delegates			12/14/2010	Legislative	Email communication between Republican member of House of Delegates and consultant advising House Republicans regarding redistricting.
B000514	Friday's Redistricting-Related Hearings and Meetings	Dave Albo, Member, Virginia House of Delegates	Chris Marston, Esq.			12/15/2010	Legislative Privilege	Email chain containing communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B000522	Agenda for Friday's Joint Reapportionment Committee	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.			12/15/2010	Legislative	Email communications between staff and consultant advising the House Republicans regarding redistricting.
B000525	Agenda for Friday's Joint Reapportionment Committee	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.			12/15/2010	Legislative	Email communications between staff and consultant advising the House Republicans regarding redistricting.
B000556	Redistricting Stuff	Chris Marston, Esq.	Kate Kruk, Staff, Virginia House of Delegates			12/16/2010	Legislative Privilege	Email communication between staff and consultant advising House Republicans regarding redistricting.
B000568	Agenda for Friday's Joint Reapportionment Committee	Chris Marston, Esq.	G. Paul Nardo, Staff, Virginia House of Delegates			12/15/2010	Legislative	Email communications between staff and consultant advising the House Republicans regarding redistricting.
B000574	Mtg on at Cabin	Paul Haughton, Staff, House Republican Campaign Committee	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.		12/17/2010	Legislative Privilege	Email communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B000579	Redistricting Meetings	Chris Marston, Esq.	G. Paul Nardo, Staff, Virginia House of Delegates			12/6/2010	Legislative Privilege	Email communication between staff and consultant advising House Republicans regarding redistricting.
B000580	Dec 17 Hearing	Chris Marston, Esq.	Mark Cole, Member, Virginia House of Delegates			11/30/2010	Legislative	Email communication between Republican member of House of Delegates and consultant advising House Republicans regarding redistricting.
B000587	Redistricting Meetings	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.			12/7/2010	Legislative Privilege	Email communications between staff and consultant advising House Republicans regarding redistricting.
B000590	meeting	Dickie Bell, Member, Virginia House of Delegates	Chris Marston, Esq.			12/11/2010	Legislative Privilege	Email communications between Republican member of House of Delegates and consultant advising House Republicans regarding redistricting.
B000591	Redistricting - Map Drawing Feature at DLS	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.			11/30/2010	Legislative Privilege	Email communications between staff and consultant advising House Republicans regarding redistricting.
B000596	Dec 17 Hearing	Chris Marston, Esq.	Mark Cole, Member, Virginia House of Delegates			11/30/2010	Legislative	Email communications between Republican member of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B000604	Check in Visit on Redistricting	Bill Howell, Speaker, Virginia House of Delegates	Chris Marston, Esq.			11/30/2010	Legislative	Email communications between Republican member of House of Delegates and consultant advising House Republicans regarding redistricting.
B000607	Check in Visit on Redistricting	Chris Marston, Esq.	Bill Howell, Speaker, Virginia House of Delegates			11/30/2010	Legislative	Email communications between Republican member of House of Delegates and consultant advising House Republicans regarding redistricting.

B000608	Redistricting Hearing	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.			12/7/2010	Legislative Privilege	Email communications between staff and consultant advising House Republicans regarding redistricting.
B000621	Dec 17 Redistricting Hearing	Chris Marston, Esq.	Bill Howell, Speaker, Virginia House of Delegates			11/30/2010	Legislative	Email communications between Republican member of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B000623	Dec 17 Hearing	Chris Marston, Esq.	Karen Stuber, Staff, Virginia House of Delegates			11/30/2010	Legislative	Email communications between Republican member of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B000631	Congressional Delegation meeting	Paul Haughton, Staff, House Republican Campaign Committee	Bill Howell, Speaker, Virginia House of Delegates	Chris Marston, Esq.		12/9/2010	Legislative Privilege	Email communication between Republican member of House of Delegates and staff and consultant advising House Republicans congressional redistricting.
B000638	Check in Visit on Redistricting	Chris Marston, Esq.	Bill Howell, Speaker, Virginia House of Delegates			11/30/2010	Legislative	Email communications between Republican member of House of Delegates and consultant advising House Republicans regarding redistricting.
B000640	Check in Visit on Redistricting	Bill Howell, Speaker, Virginia House of Delegates	Chris Marston, Esq.			11/30/2010	Legislative	Email communications between Republican member of House of Delegates and consultant advising House Republicans regarding redistricting.
B000642	MW CRs	Kathy Roberts, Staff, Virginia House of Delegates	Chris Marston, Esq.			12/6/2010	Legislative Privilege	Email communications between staff and consultant advising House Republicans regarding redistricting.
B000643	meeting	Dickie Bell, Member, Virginia House of Delegates	Chris Marston, Esq.			12/11/2010	Legislative Privilege	Email communications between Republican member of House of Delegates and consultant advising House Republicans regarding redistricting.
B000644	Follow-up on Redistricting	Chris Marston, Esq., Counsel to Virginia House Republican Campaign Committee	Jason Eige, Counsel to Virginia Governor			12/11/2010	Attorney-client Common Interest	Email communications between legal counsel advising House Republicans and the Governor regarding redistricting.
B000645	Redistricting Hearing	Chris Marston, Esq.	G. Paul Nardo, Staff, Virginia House of Delegates			12/6/2010	Legislative	Email communication between staff and consultant advising House Republicans regarding redistricting.
B000661	Dec 17 Hearing	Mark Cole, Member, Virginia House of Delegates	Chris Marston, Esq.			11/30/2010	Legislative	Email communications between Republican member of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B000663	MW CRs	Kathy Roberts, Staff, Virginia House of Delegates	Chris Marston, Esq.			12/6/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B000674	Check in Visit on Redistricting	Chris Marston, Esq.	Bill Howell, Speaker, Virginia House of Delegates			11/30/2010	Legislative	Email communications between Republican member of House of Delegates and consultant advising House Republicans regarding redistricting.
B000675	Joint P&E Redistricting Hearing on Dec. 17	G. Paul Nardo, Staff, Virginia House of Delegates	Scott Maddrea, Staff, Virginia House of Delegates	Chris Marston, Esq.		12/7/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.

B000677	meeting	Chris Marston, Esq.	Dickie Bell, Member, Virginia House of Delegates			12/11/2010	Legislative	Email communications between Republican member of House of Delegates and consultant advising House Republicans regarding redistricting.
B000684	meant to tell you...	Paul Haughton, Staff, Virginia House Republican Campaign Committee	Chris Marston, Esq.			12/9/2010	Legislative	Email communication between staff and consultant advising House Republicans regarding redistricting.
B000693	P&E Redistricting Hearing on Friday, Dec. 17	G. Paul Nardo, Staff, Virginia House of Delegates	Scott Maddrea, Staff, Virginia House of Delegates	Chris Marston, Esq.		12/8/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B000707	NCSL meeting- DELEGATE	Chris Marston, Esq.	G. Paul, Nardo, Staff, Virginia House of Delegates			11/15/2010	Legislative	Email communications between Republican member of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B000710	Delayed Primary Legislation	G. Paul, Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.			11/29/2010	Legislative	Email communications between Republican member of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B000715	Redistricting- Telephone Call	Bill Flanagan, Staff, Virginia House of Delegates	Paul Haughton, Staff, Virginia House of Republican Campaign Committee	Chris Marston, Esq.		11/18/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B000718	Delayed Primary Legislation	Mark Cole, Member, Virginia House of Delegates	Chris Marston, Esq.; Karen Stuber, Staff, Virginia House of Delegates			11/16/2010	Legislative	Email communications between Republican member of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B000728	Interesting Virginia Schools Competition	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.			11/29/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B000749	Interesting Virginia Schools Competition	Paul Haughton, Staff, Virginia House of Republican Campaign Committee	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.		11/30/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B000758	Interesting Virginia Schools Competition	Chris Marston, Esq.	Paul Haughton, Staff, Virginia House of Republican Campaign Committee			11/30/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B000780	Redistricting-Telephone Call	Paul Haughton, Staff, Virginia House of Republican Campaign Committee	Bill Flanagan, Staff, Virginia House of Delegates	Chris Marston, Esq.		11/18/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.

B000794	Delayed Primary Legislation	Chris Marston, Esq.	G. Paul Nardo, Staff, Virginia House of Delegates			11/30/2010	Legislative	Email communications between Republican member of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B000809	Redistricting - What Va Constitution says	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.			11/11/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B000811	Delayed Primary Legislation	Chris Marston, Esq.	Mark Cole, Member, Virginia House of Delegates; Karen Stuber, Staff, Virginia House of Delegates			11/16/2010	Legislative	Email communication between Republican member of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B000821	Redistricting - What Va Constitution says	Chris Marston, Esq.	G. Paul Nardo, Staff, Virginia House of Delegates			11/11/2010	Legislative; Attorney-client	Email communications between staff and consultant/legal counsel advising House Republicans regarding redistricting.
B000823	Redistricting - time for nonpartisan approach	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.			10/5/2010	Legislative	Email communications between Republican members of the House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B000826	Transcript of Redistricting Public Hearing	G. Paul Nardo, Staff, Virginia House of Delegates	Scott Maddrea, Staff, Virginia House of Delegates	Chris Marston, Esq.		9/29/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B000827	online presence	Susan, Staff, Virginia House of Delegates	G. Paul Nardo, Staff, Virginia House of Delegates; Chris Marston, Esq.			10/18/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B000828	Virginia Tomorrow - Thunder on the Right	G. Paul Nardo, Staff, Virginia House of Delegates	Bill Howell, Speaker, Virginia House of Delegates; Paul Haughton, Staff, Virginia House Republican Campaign Committee	Chris Marston, Esq.		10/18/2010	Legislative	Email communications between Republican member of House of Delegates and staff and consultant advising House Republicans regarding redistricting.

B000830	Griffith on redistricting	Paul Haughton, Staff, Virginia House Republican Campaign Committee	Bill Howell, Speaker, Virginia House of Delegates; Kirk Cox, Member, Virginia House of Delegates; S. Chris Jones, Member, Virginia House of Delegates; Robert Bell, Member, Virginia House of Delegates	Chris Marston, Esq.		10/15/2010	Legislative	Email communication between staff and consultant advising House Republicans regarding redistricting.
B000831	Delegate Opening for File	Chris Marston, Esq.	G. Paul Nardo, Staff, Virginia House of Delegates			10/5/2010	Legislative	Email communication between staff and consultant advising House Republicans regarding redistricting.
B000832	FINAL AGENDA -- Speaker's Retreat on Monday	G. Paul Nardo, Staff, Virginia House of Delegates	Bill Howell, Speaker, Virginia House of Delegates; Robert Bell, Member, Virginia House of Delegates; Kirk Cox, Member, Virginia House of Delegates; Tim Hugo, Member, Virginia House of Delegates; Paul Haughton, Staff, Virginia House Republican Campaign Committee; Chris Marston, Esq.			10/7/2010	Legislative	Email communication between Republican members of the House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B000834	Monday, Oct. 18 Hearing in Danville	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.			10/15/2010	Legislative	Email chain containing communications between Republican member of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B000836	Monday, Oct. 18 Hearing in Danville	Chris Marston, Esq.	Mark Cole, Member, Virginia House of Delegates			10/15/2010	Legislative	Email communication between Republican member of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B000837	NCSL Redistricting Seminar in Rhode Island	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.			9/27/2010	Legislative	Email communications between Republican member of House of Delegates and staff and consultant advising House Republicans regarding redistricting.

B000838	VPAP Launches Redistricting Portal	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.			11/8/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B000840	Caucus Retreat AGENDA - Please look it over and give me any feedback	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.; Paul Haughton, Staff, Virginia House Republican Campaign Committee			10/7/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B000843	Griffith on redistricting	Paul Haughton, Staff, Virginia House Republican Campaign Committee	Chris Marston, Esq.			10/15/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B000844	LATEST DRAFT AGENDAs - Speaker's Retreat	G. Paul Nardo, Staff, Virginia House of Delegates	Judy Dunigan, Staff, Virginia House of Delegates	Chris Marston, Esq.		9/28/2010	Legislative	Email communication between staff and consultant advising House Republicans regarding redistricting.
B000845	Caucus Retreat AGENDA - Please look it over and give me any feedback	Paul Haughton, Staff, Virginia House Republican Campaign Committee	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.		10/7/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B000847	Transportation Work Group - House Members	G. Paul Nardo, Staff, Virginia House of Delegates	Martin Kent, Chief-of-Staff, Governor of Virginia	Chris Marston, Esq.		10/15/2010	Legislative; Attorney-client Common Interest	Email communications between staff of Republican member of the House and staff of Governor regarding redistricting and advice of counsel.
B000855	Fun	Chris Marston, Esq.	G. Paul Nardo, Staff, Virginia House of Delegates			10/5/2010	Legislative	Email communication between staff of Speaker of the House of Delegates and consultant advising House Republicans regarding redistricting.
B000858	VPAP Launches Redistricting Portal	G. Paul Nardo, Staff, Virginia House of Delegates	G. Paul Nardo, Staff, Virginia House of Delegates		Chris Marston, Esq.	11/8/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B000860	Redistricting	Chris Marston, Esq.	Archer McGiffin, Staff, Virginia House of Delegates			10/11/2010	Legislative	Email communication between staff and consultant advising House Republicans regarding redistricting.
B000861	Griffith on redistricting	Chris Marston, Esq.	Paul Haughton, Staff, Virginia House Republican Campaign Committee			10/15/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B000862	Redistricting - time for nonpartisan approach	Chris Marston, Esq.	G. Paul Nardo, Staff, Virginia House of Delegates			10/4/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.

B000865	LATEST DRAFT AGENDAs - Speaker's Retreat	Paul Haughton, Staff, Virginia House Republican Campaign Committee	Chris Marston, Esq.			10/1/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B000867	Transcripts - OK to Post Online... but let's wait and hopefully get the first one from Roanoke	G. Paul Nardo, Staff, Virginia House of Delegates	Scott Maddrea, Staff, Virginia House of Delegates	Chris Marston, Esq.		10/5/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B000869	Caucus Retreat AGENDA - Please look it over and give me any feedback	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.			10/7/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B000874	TRANSCRIPT - House Redistricting Subcommittee Public Hearing - NORFOLK, Sept. 2, 2010	G. Paul Nardo, Staff, Virginia House of Delegates	S. Chris Jones, Member, Virginia House of Delegates; Dave Albo, Member, Virginia House of Delegates; Mark Cole, Member, Virginia House of Delegates; Robert Bell, Member, Virginia House of Delegates; Jackson Miller, Member, Virginia House of Delegate	Chris Marston, Esq.		10/4/2010	Legislative	Email communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B000875	TRANSCRIPT - House Redistricting Subcommittee Public Hearing - NORFOLK, Sept. 22, 2010	Mark Cole, Member, Virginia House of Delegates	S. Chris Jones, Member, Virginia House of Delegates; Dave Albo, Member, Virginia House of Delegates; Robert Bell, Member, Virginia House of Delegates; Jackson Miller, Member, Virginia House of Delegates; G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.		10/4/2010	Legislative	Email communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.

B000877	Caucus Retreat AGENDA - Please look it over and give me any feedback	Chris Marston, Esq.	Paul Haughton, Staff, Virginia House Republican Campaign Committee			10/7/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B000879	TRANSCRIPT - House Redistricting Subcommittee Public Hearing - NORFOLK, Sept. 22, 2010	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.			10/6/2010	Legislative	Email communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B000883	Monday, Oct. 18 Hearing in Danville	Dave Albo, Member, Virginia House of Delegates	Chris Marston, Esq.; Mark Cole, Member, Virginia House of Delegates			10/15/2010	Legislative	Email chain containing communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B000885	Monday, Oct. 18 Hearing in Danville	Mark Cole, Member, Virginia House of Delegates	Chris Marston, Esq.			10/15/2010	Legislative	Email chain containing communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B000888	Materials for 2d Public Hearing on Redistricting	Dave Albo, Member, Virginia House of Delegates	Chris Marston, Esq.			9/20/2010	Legislative	Email chain containing communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B000889	Status of 2-Pager on Redistricting	Chris Marston, Esq.	G. Paul Nardo, Staff, Virginia House of Delegates			9/20/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B000892	2ND DRAFT - Speaker's Retreat	Paul Haughton, Staff, Virginia House Republican Campaign Committee	G. Paul Nardo, Staff, Virginia House of Delegates; Bill Howell, Speaker, Virginia House of Delegates; Tim Hugo, Member, Virginia House of Delegates; Kirk Cox, Member, Virginia House of Delegates	Chris Marston, Esq.		9/24/2010	Legislative	Email chain containing communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.

B000895	Materials for 2d Public Hearing on Redistricting	Chris Marston, Esq.	Bill Howell, Speaker, Virginia House of Delegates; Robert Bell, Member, Virginia House of Delegates; S. Chris Jones, Member, Virginia House of Delegates; Jackson Miller, Member, Virginia House of Delegates; Dave Albo, Member, Virginia House of Delegates; Kirk Cox, Member, Virginia House of Delegates; G. Paul Nardo, Staff, Virginia House of Delegates; Paul Haughton, Staff, Virginia House Republican Campaign Committee			9/20/2010	Legislative	Email chain containing communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B000915	RECAP - Friday's P&E Subcommittee Conf. Call	G. Paul Nardo, Staff, Virginia House of Delegates	Dave Albo, Member, Virginia House of Delegates	Chris Marston, Esq.		9/11/2010	Legislative	Email communications between Republican member of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B000917	Materials for 2d Public Hearing on Redistricting	Chris Marston, Esq.	Dave Albo, Member, Virginia House of Delegates			9/20/2010	Legislative	Email chain containing communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B000918	Materials for 2d Public Hearing on Redistricting	Chris Marston, Esq.	Dave Albo, Member, Virginia House of Delegates			9/20/2010	Legislative	Email chain containing communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.

B000922	IMPORTANT MATERIALS FOR 1ST PUBLIC HEARING ON REDISTRICTING in Roanoke next Wed., Sept. 8	G. Paul Nardo, Staff, Virginia House of Delegates	Mark Cole, Member, Virginia House of Delegates; Rob Bell, Member, House of Delegates; S. Chris Jones, Member, Virginia House of Delegates; Jackson Miller, Member, Virginia House of Delegates; Dave Albo, Member, Virginia House of Delegates	Chris Marston, Esq.		9/3/2010	Legislative	Email communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B000924	Materials for 2d Public Hearing on Redistricting	Rob Bell, Member, House of Delegates	Chris Marston, Esq.			9/21/2010	Legislative	Email chain containing communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B000943	REVISED Redistricting Facts Handout for House P&E Subcommittee on Redistricting Public Hearings	G. Paul Nardo, Staff, Virginia House of Delegates	Ellen Porter, Staff, Virginia Division of Legislative Services	Chris Marston, Esq.		9/23/2010	Legislative	Email communications between staff of General Assembly and staff and consultant advising House Republicans regarding redistricting.
B000947	Redistricting, Public Input, Peaches, and McDonnell	Chris Marston, Esq.	G. Paul Nardo, Staff, Virginia House of Delegates			9/8/2010	Legislative	Email communication between staff and consultant advising House Republicans regarding redistricting.
B000948	REVISED Redistricting Facts Handout for House P&E Subcommittee on Redistricting Public Hearings	G. Paul Nardo, Staff, Virginia House of Delegates	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.		9/21/2010	Legislative	Email communications between staff of General Assembly and staff and consultant advising House Republicans regarding redistricting.

B000951	TIME CHANGE FOR P&E Subcommittee CONF. CALL	G. Paul Nardo, Staff, Virginia House of Delegates	Mark Cole, Member, Virginia House of Delegates; Rob Bell, Member, Virginia House of Delegates; S. Chris Jones, Member, Virginia House of Delegates; Jackson Miller, Member, Virginia House of Delegates; Dave Albo, Member, Virginia House of Delegates	Chris Marston, Esq.		9/21/2010	Legislative	Email communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B000956	Redistricting Inquiry - Delegate	G. Paul Nardo, Staff, Virginia House of Delegates	Christen Smith, Staff, Virginia House of Delegates	Chris Marston, Esq.		9/22/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B000961	PE Hearing - Roanoke	Chris Marston, Esq.	G. Paul Nardo, Staff, Virginia House of Delegates			9/8/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B000963	Materials for 2d Public Hearing on Redistricting	Chris Marston, Esq.	Dave Albo, Member, Virginia House of Delegates			9/21/2010	Legislative	Email chain containing communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B000967	1ST DRAFT - Retreat Agenda	Paul Haughton, Staff, Virginia House Republican Campaign Committee	G. Paul Nardo, Staff, Virginia House of Delegates; Judy Dunigan, Staff, Virginia House of Delegates	Chris Marston, Esq.		9/21/2010	Legislative	Email communication between staff and consultant advising House Republicans regarding redistricting.
B000969	2ND DRAFT - Speaker's Retreat	G. Paul Nardo, Staff, Virginia House of Delegates	Bill Howell, Speaker, Virginia House of Delegates; Kirk Cox, Member, Virginia House of Delegates; Tim Hugo, Member, Virginia House of Delegates	Chris Marston, Esq.		9/24/2010	Legislative	Email chain containing communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B000971	REVISED OPENING STATEMENT FOR TONIGHT'S P&E Redistricting Hearing	G. Paul Nardo, Staff, Virginia House of Delegates	S. Chris Jones, Member, Virginia House of Delegates	Chris Marston, Esq.		9/22/2010	Legislative	Email communication between Republican member of House of Delegates and staff and consultant advising House Republicans regarding redistricting.

B000972	PE Hearing - Roanoke	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.			9/8/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B000973	Redistricting Presentations	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.			9/17/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B000980	1ST DRAFT - Retreat Agenda	G. Paul Nardo, Staff, Virginia House of Delegates	Judy Dunigan, Staff, Virginia House of Delegates	Chris Marston, Esq.		9/21/2010	Legislative	Email communication between staff and consultant advising House Republicans regarding redistricting.
B000981	Materials for 2d Public Hearing on Redistricting	Dave Albo, Member, Virginia House of Delegates	Chris Marston, Esq.			9/20/2010	Legislative	Email chain containing communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B000982	Redistricting Presentations	G. Paul Nardo, Staff, Virginia House of Delegates	Jack Austin, Staff, Virginia Division of Legislative Services	Chris Marston, Esq.		9/17/2010	Legislative	Email communications between staff of the General Assembly and staff and consultant advising House Republicans regarding redistricting.
B000994	Materials for 2d Public Hearing on Redistricting	Dave Albo, Member, Virginia House of Delegates	Chris Marston, Esq.			9/21/2010	Legislative	Email chain containing communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B000998	Redistricting Special Session	Chris Marston, Esq.	G. Paul Nardo, Staff, Virginia House of Delegates			9/10/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B000999	Redistricting, Public Input, Peaches and McDonnell	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.			9/9/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B001001	Status of 2-Pager on Redistricting	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.			9/20/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B001006	SAMPLE CONSTITUENT LETTER on Redistricting	G. Paul Nardo, Staff, Virginia House of Delegates	G. Paul Nardo, Staff, Virginia House of Delegates		Chris Marston, Esq.	8/31/2010	Legislative	Email communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B001009	Sample Q&A on Redistricting	Chris Marston, Esq.	G. Paul Nardo, Staff, Virginia House of Delegates			9/3/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B001010	Redistricting Hearings	G. Paul Nardo, Staff, Virginia House of Delegates	Jack Austin, Staff, Virginia Division of Legislative Services	Chris Martin, Esq.		9/2/2010	Legislative	Email communications between staff of General Assembly and staff and consultant advising House Republicans regarding redistricting.

B001018	FF Times - McDonnell Quote on Redistricting Criteria	G. Paul Nardo, Staff, Virginia House of Delegates	Bill Howell, Speaker, Virginia House of Delegates; Kirk Cox, Member, Virginia House of Delegates; S. Chris Jones, Member, Virginia House of Delegates; Robert Bell, Member, Virginia House of Delegates; Paul Haughton, Staff, Virginia House Republican Campaign Committee; Chris Marston, Esq.		8/31/2010	Legislative	Email communication between Republican members of the House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B001019	today's Times Dispatch Story on Redistricting and Delegate Comments	G. Paul Nardo, Staff, Virginia House of Delegates	Bill Howell, Speaker, Virginia House of Delegates; Kirk Cox, Member, Virginia House of Delegates; S. Chris Jones, Member, Virginia House of Delegates; Paul Haughton, Staff, Virginia House Republican Campaign Committee; Robert Bell, Member, Virginia House of Delegates; Chris Marston, Esq.; S. Chris Jones, Member, Virginia House of Delegates; Chris Marston, Esq.		8/29/2010	Legislative	Email communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.

B001021	Sample Q&A on Redistricting	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.			9/3/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B001033	Vm	Chris Marston, Esq.	Paul Haughton, Staff, Virginia House Republican Campaign Committee			9/3/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B001034	REVISED FINAL - Delegate Opening Statement at Public Hearings on Redistricting	G. Paul Nardo, Staff, Virginia House of Delegates	Mark Cole, Member, Virginia House of Delegates	Chris Marston, Esq.		9/3/2010	Legislative	Email communication between Republican member of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B001035	HEADS UP - Wed's Public Hearing	G. Paul Nardo, Staff, Virginia House of Delegates	Robert Bell, Member, Virginia House of Delegates; S. Chris Jones, Member, Virginia House of Delegates	Chris Marston, Esq.		9/3/2010	Legislative	Email communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B001044	Q&A	Chris Marston, Esq.	G. Paul Nardo, Staff, Virginia House of Delegates			9/3/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B001045	Principles for Transparency and Public Participation in Redistricting	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.			9/2/2010	Legislative	Email communications between staff of General Assembly and staff and consultant advising House Republicans regarding redistricting.
B001050	Vm	Paul Haughton, Staff, Virginia House Republican Campaign Committee	Chris Marston, Esq.			9/3/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B001053	New voicemail from Delegate	Paul Haughton, Staff, Virginia House Republican Campaign Committee	Chris Marston, Esq.			9/2/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B001054	P&E Public Hearings - FEEDBACK TO DLS STAFF	G. Paul Nardo, Staff, Virginia House of Delegates	Mark Cole, Member, Virginia House of Delegates	Chris Marston, Esq.		9/3/2010	Legislative	Email communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B001060	Vm	Chris Marston, Esq.	Paul Haughton, Staff, Virginia House Republican Campaign Committee			9/3/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.

B001062	Wash Post Blog -- Senator: House Snubbed Senate on Redistricting Hearings	G. Paul Nardo, Staff, Virginia House of Delegates	Bill Howell, Speaker, Virginia House of Delegates; Robert Bell, Member, Virginia House of Delegates; S. Chris Jones, Member, Virginia House of Delegates; Kirk Cox, Member, Virginia House of Delegates; Chris Marston, Esq.; Paul Haughton, Staff, Virginia House Republican Campaign Committee			8/31/2010	Legislative	Email communication between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B001067	New voicemail	Paul Haughton, Staff, Virginia House Republican Campaign Committee	Chris Marston, Esq.			9/2/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B001068	Redistricting Hearings - Please give direction to DLS Staff	G. Paul Nardo, Staff, Virginia House of Delegates	Mark Cole, Member, Virginia House of Delegates	Chris Marston, Esq.		9/2/2010	Legislative	Email communications between Republican member of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B001072	REVISED DRAFT Statement for Delegate at P&E Redistricting Public Hearings	G. Paul Nardo, Staff, Virginia House of Delegates	Bill Howell, Speaker, Virginia House of Delegates	Chris Marston, Esq.		9/1/2010	Legislative	Email communication between staff and consultant advising House Republicans regarding redistricting.
B001073	REVISED Sample Redistricting Constituent Letter - PLEASE REVIEW & OFFER YOUR INPUT	G. Paul Nardo, Staff, Virginia House of Delegates	Bill Howell, Speaker, Virginia House of Delegates	Chris Marston, Esq.		8/31/2010	Legislative	Email communication between Republican member of House of Delegates and staff and consultant advising House Republicans regarding redistricting.

B001075	P&E Hearing Press Release - Membership Additions by Delegate - NEED PRE-PUBLIC HEARING MEETING	G. Paul Nardo, Staff, Virginia House of Delegates	Bill Howell, Speaker, Virginia House of Delegates; Kirk Cox, Member, Virginia House of Delegates; Paul Haughton, Staff, Virginia House Republican Campaign Committee; Chris Marston, Esq.; S. Chris Jones, Member, Virginia House of Delegates; Robert Bell, Member, Virginia House of Delegates		8/19/2010	Legislative	Email communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B001078	Redistricting	Susan Clark, Staff, Virginia House of Delegates	Paul Haughton, Staff, Virginia House Republican Campaign Committee; G. Paul Nardo, Staff, Virginia House of Delegates; Chris Marston, Esq.		8/26/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B001080	Redistricting - Need updated Caucus response letters	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.		8/27/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B001088	Cavalier article on redistricting	Paul Haughton, Staff, Virginia House Republican Campaign Committee	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.	8/26/2010	Legislative	Email communication between staff and consultant advising House Republicans regarding redistricting.

B001089	SPEAKER REQUEST -- Meeting with You	G. Paul Nardo, Staff, Virginia House of Delegates	Bill Howell, Speaker, Virginia House of Delegates; Kirk Cox, Member, Virginia House of Delegates; Mark Cole, Member, Virginia House of Delegates; S. Chris Jones, Member, Virginia House of Delegates; Robert Bell, Member, Virginia House of Delegates; Jackson Miller, Member, Virginia House of Delegates; Dave Albo, Member, Virginia House of Delegates	Chris Marston, Esq.		8/24/2010	Legislative	Email communication between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B001092	DRAFT News Release for House P&E Redistricting Public Hearings Announcement	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.			8/18/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B001095	Hearings	Mark Cole, Member, Virginia House of Delegates	Chris Marston, Esq.			8/26/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B001097	P&E Hearing Press Release - Membership Additions by Cole - NEED PRE-PUBLIC HEARING MEETING	Chris Marston, Esq.	G. Paul Nardo, Staff, Virginia House of Delegates			8/20/2010	Legislative	Email communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B001098	Hearings	Chris Marston, Esq.	Mark Cole, Member, Virginia House of Delegates			8/26/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B001100	Hearing Schedule	Chris Marston, Esq.	Jackson Miller, Member, Virginia House of Delegates			8/23/2010	Legislative	Email communication between Republican member of House of Delegates and consultant advising House Republicans regarding redistricting.

B001101	Redistricting	Paul Haughton, Staff, Virginia House Republican Campaign Committee	S. Chris Jones, Member, Virginia House of Delegates; Robert Bell, Member, Virginia House of Delegates; Chris Marston, Esq.			8/26/2010	Legislative	Email communications between Republican member of House of Delegates and staff consultant advising House Republicans regarding redistricting.
B001104	Gov's Office and Redistricting	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.			8/20/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B001105	Barry DuVal Lunch & Redistricting	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.			8/23/2010	Legislative	Email chain containing communications between Republican members of the House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B001107	Barry DuVal Lunch & Redistricting	Chris Marston, Esq.	Bill Howell, Speaker, Virginia House of Delegates	G. Paul Nardo, Staff, Virginia House of Delegates; Paul Haughton, Staff, Virginia House Republican Campaign Committee		8/23/2010	Legislative	Email communication between Republican member of the House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B001108	P&E Hearing Press Release - Membership Additions by Delegate - NEED PRE-PUBLIC HEARING MEETING	G. Paul Nardo, Staff, Virginia House of Delegates	Paul Haughton, Staff, Virginia House Republican Campaign Committee	Chris Marston, Esq.		8/19/2010	Legislative	Email communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B001110	Redistricting	S. Chris Jones, Member, Virginia House of Delegates	Chris Marston, Esq.; Paul Haughton, Staff, Virginia House Republican Campaign Committee; Robert Bell, Member, Virginia House of Delegates			8/26/2010	Legislative	Email communications between Republican member of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B001113	Hearings	Chris Marston, Esq.	Karen Stuber, Staff, Virginia House of Delegates			8/23/2010	Legislative	Email communication between staff and consultant advising House Republicans regarding redistricting.
B001119	Gov's Office and Redistricting	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.			8/20/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.

B001124	P&E Hearing Press Release - Membership Additions by Delegate - NEED PRE-PUBLIC HEARING MEETING	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.			8/20/2010	Legislative	Email communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B001127	DRAFT News Release for House P & E Redistricting Public Hearings Announcement	Chris Marston, Esq.	G. Paul Nardo, Staff, Virginia House of Delegates			8/18/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B001129	Sample Constituent Response on Redistricting	Chris Marston, Esq.	G. Paul Nardo, Staff, Virginia House of Delegates; Paul Haughton, Staff, Virginia House Republican Campaign Committee; Robert Bell, Member, Virginia House of Delegates			8/28/2010	Legislative	Email communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B001132	House P&E Redistricting Subcommittee - 6 PUBLIC HEARINGS SCHEDULE FOR THIS FALL	G. Paul Nardo, Staff, Virginia House of Delegates	S. Chris Jones, Member, Virginia House of Delegates; Paul Haughton, Staff, Virginia House Republican Campaign Committee; Chris Marston, Esq.; Kirk Cox, Member, Virginia House of Delegates, Robert Bell, Member, Virginia House of Delegates, Bill Howell, Speaker, Virginia House of Delegates			8/17/2010	Legislative	Email communication between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B001136	Redistricting	Chris Marston, Esq.	Matt Burning, Staff, Virginia Governor			8/20/2010	Legislative	Email communication between consultant advising House Republicans and policy staff of Governor regarding redistricting.

B001137	Hearing Press Release - Membership Additions by Delegate - NEED PRE-PUBLIC HEARING MEETING	Paul Haughton, Staff, Virginia House Republican Campaign Committee	G. Paul Nardo, Staff, Virginia House of Delegates; Bill Howell, Speaker, Virginia House of Delegates; Chris Marston, Esq.; Kirk Cox, Member, Virginia House of Delegates; Robert Bell, Member, Virginia House of Delegates, S. Chris Jones, Member, Virginia House of Delegates		8/19/2010	Legislative	Email communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B001142	P&E Hearing Press Release - Membership Additions by Delegate - NEED PRE-PUBLIC HEARING MEETING	Paul Haughton, Staff, Virginia House Republican Campaign Committee	G. Paul Nardo, Staff, Virginia House of Delegates; Bill Howell, Speaker, Virginia House of Delegates; Chris Marston, Esq.; Kirk Cox, Member, Virginia House of Delegates; Robert Bell, Member, Virginia House of Delegates, S. Chris Jones, Member, Virginia House of Delegates		8/19/2010	Legislative	Email communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B001147	Delegate Remarks Draft	Chris Marston, Esq.	G. Paul Nardo, Staff, Virginia House of Delegates		8/28/2010	Legislative	Email communication between staff and consultant advising House Republicans regarding redistricting.
B001148	Barry DuVal Lunch & Redistricting	Chris Marston, Esq.	G. Paul Nardo, Staff, Virginia House of Delegates		8/23/2010	Legislative	Email chain containing communications between Republican members of the House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B001150	Gov's Office and Redistricting	Chris Marston, Esq.	G. Paul Nardo, Staff, Virginia House of Delegates		8/20/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.

B001152	Redistricting - Need updated Caucus response letters	Chris Marston, Esq.	G. Paul Nardo, Staff, Virginia House of Delegates			8/27/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B001158	House P&E SubCmte on Redistricting - PUBLIC HEARING SCHEDULE	Robert Bell, Member, Virginia House of Delegates	Chris Marston, Esq.; G. Paul Nardo, Staff, Virginia House of Delegates			8/15/2010	Legislative	Email chain containing communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B001161	House P&E SubCmte on Redistricting - PUBLIC HEARING SCHEDULE	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.; S. Chris Jones, Member, Virginia House of Delegates, Robert Bell, Member, Virginia House of Delegates; Paul Haughton, Staff, Virginia House Republican Campaign Committee; Kirk Cox, Member, Virginia House of Delegates			8/13/2010	Legislative	Email chain containing communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B001165	ROMP Update and Redistricting	Chris Marston, Esq.	G. Paul Nardo, Staff, Virginia House of Delegates			7/8/2010	Legislative	Email communication between staff and consultant advising House Republicans regarding redistricting.
B001167	Schedules	Chris Marston, Esq.	Susan, Staff, Virginia House of Delegates			7/12/2010	Legislative	Email chain containing communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.

B001169	House P&E SubCmte on Redistricting - PUBLIC HEARING SCHEDULE	G. Paul Nardo, Staff, Virginia House of Delegates	Bill Howell, Speaker, Virginia House of Delegates; Chris Marston, Esq.; S. Chris Jones, Member, Virginia House of Delegates, Robert Bell, Member, Virginia House of Delegates; Paul Haughton, Staff, Virginia House Republican Campaign Committee; Kirk Cox, Member, Virginia House of Delegates			8/13/2010	Legislative	Email chain containing communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B001172	Schedules	S. Chris Jones, Member, Virginia House of Delegates	Chris Marston, Esq.			7/12/2010	Legislative	Email chain containing communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B001181	Speaker's PAC	Chris Marston, Esq.	Karen Stuber, Staff, Virginia House of Delegates			7/2/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B001183	Schedules	S. Chris Jones, Member, Virginia House of Delegates	Chris Marston, Esq.; Robert Bell, Member, Virginia House of Delegates			7/19/2010	Legislative	Email chain containing communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B001193	Schedules	Robert Bell, Member, Virginia House of Delegates	Chris Marston, Esq.			7/6/2010	Legislative	Email chain containing communications between Republican members of House of Delegates and consultant advising House Republicans regarding redistricting.
B001196	House P&E Redistricting Subcommittee Public Hearings -- PUBLIC HEARING SCHEDULE	Chris Marston, Esq.	G. Paul Nardo, Staff, Virginia House of Delegates			8/31/2010	Legislative	Email chain containing communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B001199	House P&E Redistricting Subcmte Public Hearings - Transcripts	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.			8/13/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B001201	Speaker's PAC	Karen Stuber, Staff, Virginia House of Delegates	Chris Marston, Esq.			7/16/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B001203	FB: Redistricting	Chris Marston, Esq.	G. Paul Nardo, Staff, Virginia House of Delegates			6/4/2010	Legislative	Email communication between staff and consultant advising House Republicans regarding redistricting.

B001204	Schedules	Chris Marston, Esq.	S. Chris Jones, Member, Virginia House of Delegates; Robert Bell, Member, Virginia House of Delegates			7/3/2010	Legislative	Email communication between Republican members of House of Delegates and consultant advising House Republicans regarding redistricting.
B001211	Redistricting TPs	Chris Marston, Esq.	G. Paul Nardo, Staff, Virginia House of Delegates			8/17/2010	Attorney-client; Legislative	Email communications between Republican member of House of Delegates and staff consultant advising House Republicans regarding and reflecting legal advice concerning redistricting.
B001214	Redistricting SubCmte Public Hearings	Karen Stuber, Staff, Virginia House of Delegates	Chris Marston, Esq.			8/13/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B001217	Schedules	Chris Marston, Esq.	Susan Clark, Staff for S. Chris Jones, Member, Virginia House of Delegates			7/21/2010	Legislative	Email chain containing communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B001219	Schedules	Susan Clark, Staff to S. Chris Jones, Member, Virginia House of Delegates	Chris Marston, Esq.			7/22/2010	Legislative	Email chain containing communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B001225	FB: Redistricting	Chris Marston, Esq.	G. Paul Nardo, Staff, Virginia House of Delegates			6/4/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B001227	Pop; ROMP	Chris Marston, Esq.	Paul Houghton, Staff, Virginia House Republican Campaign Committee			7/11/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B001228	Schedules	Robert Bell, Member, Virginia House of Delegates	Chris Marston, Esq.			7/6/2010	Legislative	Email chain containing communications between Republican members of House of Delegates and consultant advising House Republicans regarding redistricting.
B001229	FB; Redistricting	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.			6/4/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.

B001230	CONFIRMATION Redistricting Meeting HERE IN GAB in RICHMOND	G. Paul Nardo, Staff, Virginia House of Delegates	Bill Howell, Speaker, Virginia House of Delegates; Kirk Cox, Member, Virginia House of Delegates; Robert Bell, Member, Virginia House of Delegates; S. Chris Jones, Member, Virginia House of Delegates; Paul Haughton, Staff, Virginia House Republican Campaign Committee; Chris Marston, Esq.; G. Paul Nardo, Staff, Virginia House of Delegates			6/1/2010	Legislative	Email communications between Republican members of the House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B001236	Speaker's PAC	Chris Marston, Esq.	Karen Stuber, Staff, Virginia House of Delegates			7/16/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B001238	Schedules	Chris Marston, Esq.	Robert Bell, Member, Virginia House of Delegates			7/6/2010	Legislative	Email chain containing communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B001241	Redistricting TPs	Chris Marston, Esq., Counsel to Virginia House Republican Campaign Committee	Jackson Miller, Member, Virginia House of Delegates			7/27/2010	Legislative; Attorney-client	Email communication between Republican member of House of Delegates and consultant/legal counsel advising House Republicans regarding and reflecting legal advice concerning redistricting.
B001250	Redistricting SubCmte Public Hearings	Chris Marston, Esq.	Karen Stuber, Staff, Virginia House of Delegates			8/13/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.

B001255	House SubCmte on Redistricting -- PUBLIC HEARING SCHEDULE	Robert Bell, Member, Virginia House of Delegates	G. Paul Nardo, Staff, Virginia House of Delegates; Bill Howell, Speaker, Virginia House of Delegates; S. Chris Jones, Member, Virginia House of Delegates; Paul Haughton, Staff, Virginia House Republican Campaign Committee; Chris Marston, Esq.; Kirk Cox, Member, Virginia House of Delegates			8/15/2010	Legislative	Email chain containing communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B001257	Pop; ROMP	Paul Haughton, Staff, Virginia House Republican Campaign Committee	Chris Marston, Esq.			7/11/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B001261	Redistricting SubCmte Public Hearings	Chris Marston, Esq.	Karen Stuber, Staff, Virginia House of Delegates			8/14/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B001266	Speaker's PAC	Karen Stuber, Staff, Virginia House of Delegates	Chris Marston			7/16/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B001268	House P&E Redistricting Subcommittee Public Hearings	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.			7/29/2010	Legislative	Email chain containing communications between Republican members of House of Delegates, staff of House of Delegates, and staff and consultant advising House Republicans regarding redistricting.

B001271	SPEAKER REQUEST -- Redistricting Meeting	G. Paul Nardo, Staff, Virginia House of Delegates	Bill Howell, Speaker, Virginia House of Delegates; Kirk Cox, Member, Virginia House of Delegates; Robert Bell, Member, Virginia House of Delegates; S. Chris Jones, Member, Virginia House of Delegates; Paul Haughton, Staff, Virginia House Republican Campaign Committee; Chris Marston, Esq.; G. Paul Nardo, Staff, Virginia House of Delegates			5/14/2010	Legislative Privilege; Attorney- Client Privilege	Email communication between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting and seeking advice of counsel.
B001273	Please check me	Paul Haughton, Staff, Virginia House Republican Campaign Committee	Chris Marston, Esq.			5/3/2010	Legislative	Email communication between staff and consultant advising House Republicans regarding redistricting.
B001276	Redistricting Stuff	Chris Marston, Esq.	Karen Stuber, Staff, Virginia House of Delegates			5/17/2010	Legislative	Email communication between staff and consultant advising House Republicans regarding redistricting.
B001277	VA House at RNS Redistricting Conference	John Morgan, Consultant to Republican Members of Virginia House of Delegates	Paul Haughton, Staff, Virginia House Republican Campaign Committee; S. Chris Jones, Member, Virginia House of Delegates; Robert Bell, Member, Virginia House of Delegates	Chris Marston, Esq.		4/8/2010	Legislative	Email chain containing communications between Republican members of the House of Delegates and staff and consultants advising House Republicans regarding redistricting.

B001279	VA House at RNS Redistricting Conference	Clark Bensen, Consultant to Republican Members of Virginia House of Delegates	Chris Marston, Esq.; S. Chris Jones, Member, Virginia House of Delegates; Robert Bell, Member, Virginia House of Delegates; John Morgan, Consultant to Republican Members of Virginia House of Delegates; G. Paul Nardo, Staff, Virginia House of Delegates; Paul Haughton, Staff, Virginia House Republican Campaign Committee			4/6/2010	Legislative	Email chain containing communications between Republican members of the House of Delegates and staff and consultants advising House Republicans regarding redistricting.
B001283	News Release - Reapportionment Committee	G. Paul Nardo, Staff, Virginia House of Delegates	G. Paul Nardo, Staff, Virginia House of Delegates		Chris Marston, Esq.	4/30/2010	Legislative	Email communication between staff and consultant advising House Republicans regarding redistricting.
B001284	VA House at RNC Redistricting Conference	Paul Haughton, Staff, Virginia House Republican Campaign Committee	John Morgan, Consultant to Republican Members of Virginia House of Delegates; S. Chris Jones, Member, Virginia House of Delegates; Robert Bell, Member, Virginia House of Delegates	Chris Marston, Esq.		4/8/2010	Legislative	Email chain containing communications between Republican members of the House of Delegates and staff and consultants advising House Republicans regarding redistricting.
B001286	VAP	Paul Haughton, Staff, Virginia House Republican Campaign Committee	John Morgan, Consultant to Republican Members of Virginia House of Delegates	Chris Marston, Esq.		5/14/2010	Legislative	Email communication between consultants advising House Republicans regarding redistricting.
B001287	Redistricting Conference Update	Chris Marston, Esq.	Paul Haughton, Staff, Virginia House Republican Campaign Committee			4/28/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.

B001292	HEADS UP - Brief Caucus Meeting	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.			5/8/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B001301	SPEAKER REQUEST -- Redistricting Meeting	G. Paul Nardo, Staff, Virginia House of Delegates	Bill Howell, Speaker, Virginia House of Delegates; Robert Bell, Member, Virginia House of Delegates; Kirk Cox, Member, Virginia House of Delegates; S. Chris Jones, Member, Virginia House of Delegates; Paul Haughton, Staff, Virginia House Republican Campaign Committee; Chris Marston, Esq.; G. Paul Nardo, Staff, Virginia House of Delegates			5/14/2010	Legislative	Email communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting and seeking advice of counsel.
B001303	Redistricting Stuff	Chris Marston, Esq.	Karen Stuber, Staff, Virginia House of Delegates			5/17/2010	Legislative	Email communication between staff and consultant advising House Republicans regarding redistricting.

B001305	VA House at RNC Redistricting Conference	Chris Marston, Esq.	Robert Bell, Member, Virginia House of Delegates; S. Chris Jones, Member, Virginia House of Delegates; Paul Haughton, Staff, Virginia House Republican Campaign Committee; G. Paul Nardo, Staff, Virginia House of Delegates; Clark Bensen, Consultant to Republican Members of Virginia House of Delegates			4/6/2010	Legislative	Email communication between Republican members of the House of Delegates and staff and consultants advising House Republicans regarding redistricting.
B001306	Redistricting Stuff	Karen Stuber, Staff, Virginia House of Delegates	Chris Marston, Esq.			6/3/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B001308	VA House at RNC Redistricting Conference	S. Chris Jones, Member, Virginia House of Delegates	Robert Bell, Member, Virginia House of Delegates	Chris Marston, Esq.		4/8/2010	Legislative	Email chain containing communications between Republican members of the House of Delegates and staff and consultants advising House Republicans regarding redistricting.
B001309	Redistricting Memo	Chris Marston, Esq.	Paul Haughton, Staff, Virginia House Republican Campaign Committee			5/4/2010	Legislative; Attorney-client	Email communication between staff and consultant/legal counsel advising House Republicans regarding redistricting.

B001312	VA House at RNC Redistricting Conference	G. Paul Nardo, Staff, Virginia House of Delegates	Robert Bell, Member, Virginia House of Delegates; S. Chris Jones, Member, Virginia House of Delegates; John Morgan, Consultant to Republican Members of Virginia House of Delegates; Clark Bensen, Consultant to Republican Members of Virginia House of Delegates; Paul Haughton, Staff, Virginia House Republican Campaign Committee	Chris Marston, Esq.		4/6/2010	Legislative	Email chain containing communications between Republican members of the House of Delegates and staff and consultants advising House Republicans regarding redistricting.
B001321	Redistricting Law 2010	Julie Coggsdale, Staff, Virginia House of Delegates	Chris Marston, Esq.			5/25/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B001324	VA House at RNC Redistricting Conference	Paul Haughton, Staff, Virginia House Republican Campaign Committee	S. Chris Jones, Member, Virginia House of Delegates; Robert Bell, Member, Virginia House of Delegates	Chris Marston, Esq.		4/8/2010	Legislative	Email chain containing communications between Republican members of the House of Delegates and staff and consultants advising House Republicans regarding redistricting.
B001325	misc	Paul Haughton, Staff, Virginia House Republican Campaign Committee	Chris Marston, Esq.			5/4/2010	Legislative	Email communications between staff and consultants advising House Republicans regarding redistricting.
B001332	HEADS UP - Brief Caucus Meeting	Paul Haughton, Staff, Virginia House Republican Campaign Committee	Chris Marston, Esq.			5/7/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.

B001340	VA House at RNC Redistricting Conference	Robert Bell, Member, Virginia House of Delegates	Chris Marston, Esq.; S. Chris Jones, Member, Virginia House of Delegates; John Morgan, Consultant to Republican Members of Virginia House of Delegates; Paul Haughton, Staff, Virginia House Republican Campaign Committee; G. Paul Nardo, Staff, Virginia House of Delegates; Clark Bensen, Consultant to Republican Members of Virginia House of Delegates			4/8/2010	Legislative	Email chain containing communications between Republican members of the House of Delegates and staff and consultants advising House Republicans regarding redistricting.
B001341	VA House at RNC Redistricting Conference	Susan, Staff, Virginia House of Delegates	Christ Marston, Esq.			4/6/2010	Legislative	Email chain containing communications between Republican members of the House of Delegates and staff and consultants advising House Republicans regarding redistricting.
B001342	VA House at RNC Redistricting Conference	S. Chris Jones, Member, Virginia House of Delegates	Christ Marston, Esq.			4/7/2010	Legislative	Email chain containing communications between Republican members of the House of Delegates and staff and consultants advising House Republicans regarding redistricting.
B001349	2 Possible Dates for a Redistricting Meeting with the Speaker	G. Paul Nardo, Staff, Virginia House of Delegates	Kirk Cox, Member, Virginia House of Delegates	Chris Marston, Esq.		5/12/2010	Legislative	Email communications between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B001351	Lawmakers press McDonald to act on bipartisan redistricting	G. Paul Nardo, Staff, Virginia House of Delegates	S. Chris Jones, Member, Virginia House of Delegates	Chris Marston, Esq.		5/16/2010	Legislative	Email communications between Republican member of House of Delegates and staff consultant advising House Republicans regarding redistricting.
B001352	Comstock	Paul Haughton, Staff, Virginia House Republican Campaign Committee	G. Paul Nardo, Staff, Virginia House of Delegates; Chris Marston, Esq.			4/6/2010	Legislative	Email communication between staff and consultant advising House Republicans regarding redistricting.

B001354	VA House at RNC Redistricting Conference	Paul Haughton, Staff, Virginia House Republican Campaign Committee	Chris Marston, Esq.; Robert Bell, Member, Virginia House of Delegates; S. Chris Jones, Member, Virginia House of Delegates; John Morgan, Consultant to Republican Members of Virginia House of Delegates; G. Paul Nardo, Staff, Virginia House of Delegates; Clark Bensen, Consultant to Republican Members of Virginia House of Delegates			4/6/2010	Legislative	Email chain containing communications between Republican members of the House of Delegates and staff and consultants advising House Republicans regarding redistricting.
B001355	HEADS UP - Brief Caucus Meeting	Chris Marston, Esq.	Paul Haughton, Staff, Virginia House Republican Campaign Committee			5/7/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B001356	Redistricting Stuff	Chris Marston, Esq.	Karen Stuber, Staff, Virginia House of Delegates			6/3/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B001359	Legislative Immunity	Chris Marston, Esq.	G. Paul Nardo, Staff, Virginia House of Delegates			4/18/2010	Attorney-client	Email communication between legal counsel to Virginal House Republican Caucus and client regarding redistricting.
B001361	Redistricting -- INFO FROM DLS	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.			5/7/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B001370	HEADS UP - Brief Caucus Meeting	Paul Haughton, Staff, Virginia House Republican Campaign Committee	Chris Marston, Esq.			5/8/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B001373	Redistricting	Lindsay Fisher, Staff, Virginia House of Delegates	Chris Marston, Esq.			2/17/2010	Legislative	Email communication between staff and consultant advising House Republicans regarding redistricting.

B001374	Redistricting	Chris Marston, Esq.	Paul Haughton, Staff, Virginia House Republican Campaign Committee			2/15/2010	Legislative	Email communication between staff and consultant advising House Republicans regarding redistricting.
B001375	Redistricting consultants	Paul Haughton, Staff, Virginia House Republican Campaign Committee	Chris Marston, Esq.			3/23/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B001385	Bipartisan Redistricting	G. Paul Nardo, Staff, Virginia House of Delegates	S. Chris Jones, Member, House of Delegates	Chris Marston, Esq.		3/31/2010	Legislative	Email communication between Republican member of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B001386	Bipartisan Redistricting	G. Paul Nardo, Staff, Virginia House of Delegates	S. Chris Jones, Member, House of Delegates	Chris Marston, Esq.		3/31/2010	Legislative	Email communication between Republican member of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B001395	C. Jones Info. on 2001 DOJ Filing for PreClearance for HB 1	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.; Paul Haughton, Staff, Virginia House Republican Campaign Committee			3/31/2010	Legislative	Email chain containing communications between Republican member of the House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B001397	the Senate	Paul Haughton, Staff, Virginia House Republican Campaign Committee	Chris Marston, Esq.; G. Paul Nardo, Staff, Virginia House of Delegates; S. Chris Jones, Member, House of Delegates			2/25/2010	Legislative	Email communications between Republican member of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B001403	Redistricting	Paul Haughton, Staff, Virginia House Republican Campaign Committee	Chris Marston, Esq.			2/15/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
B001408	C. Jones info. on 2001 DOJ Filing for PreClearance for HB 1	Paul Haughton, Staff, Virginia House Republican Campaign Committee	Chris Marston, Esq., Consultant to Republican Members of Virginia House of Delegates and legal counsel to Virginia House Republican Caucus			3/31/2010	Legislative	Email chain containing communications between Republican member of the House of Delegates and staff and consultant advising House Republicans regarding redistricting.

B001417	Computer Compatibility	G. Paul Nardo, Staff, Virginia House of Delegates	Paul Haughton, Staff, Virginia House Republican Campaign Committee	Chris Marston, Esq., Consultant to Republican Members of Virginia House of Delegates		2/26/2010	Legislative	Email communication between staff and consultant advising House Republicans regarding redistricting.
B001424	Redistricting info	Paul Haughton, Staff, Virginia House Republican Campaign Committee	Chris Marston, Esq.			2/25/2010	Legislative	Email communication between staff and consultant advising House Republicans regarding redistricting.
B001432	Bipartisan Redistricting	G. Paul Nardo, Staff, Virginia House of Delegates	Bill Howell, Speaker, Virginia House of Delegates	Chris Marston, Esq.		4/1/2010	Legislative	Email communication between Republican member of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B001441	Redistricting	Chris Marston, Esq.	Lindsay Fisher, Staff, Virginia House of Delegates			2/17/2010	Legislative	Email communication between staff and consultant advising House Republicans regarding redistricting.
B001442	PLEASE PLAN ON ATTENDING -- RNC Redistricting Conference in Washington April 29-May 1	G. Paul Nardo, Staff, Virginia House of Delegates	Robert Bell, Member, Virginia House of Delegates; S. Chris Jones, Member, Virginia House of Delegates; Chris Marston, Esq.			3/30/2010	Legislative	Email communication between Republican members of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B001456	C. Jones info. on 2001 DOJ Filing for PreClearance for HB 1	Paul Haughton, Staff, Virginia House Republican Campaign Committee	G. Paul Nardo, Staff, Virginia House of Delegates; Chris Marston, Esq.			3/31/2010	Legislative	Email chain containing communications between Republican member of the House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B001462	Computer Compatibility	Paul Haughton, Staff, Virginia House Republican Campaign Committee	G. Paul Nardo, Staff, Virginia House of Delegates	Chris Marston, Esq.		2/26/2010	Legislative	Email communication between staff and consultant advising House Republicans regarding redistricting.

B001466	PLEASE READ	Paul Haughton, Staff, Virginia House Republican Campaign Committee	G. Paul Nardo, Staff, Virginia House of Delegates; Bill Howell, Speaker, Virginia House of Delegates; Kirk Cox, Member, Virginia House of Delegates; Chris Marston, Esq.; Bill Flanagan, Staff, Virginia House of Delegates			3/8/2010	Legislative	Email communications between Republican members of the House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B001475	the Senate	G. Paul Nardo, Staff, Virginia House of Delegates	Paul Haughton, Staff, Virginia House Republican Campaign Committee	Chris Marston, Esq.		2/26/2010	Legislative	Email communications between Republican member of House of Delegates and staff and consultant advising House Republicans regarding redistricting.
B001488	status and query	Paul Haughton, Staff, Virginia House Republican Campaign Committee	Chris Marston, Esq.			2/13/2010	Legislative	Email communications between staff and consultant advising House Republicans regarding redistricting.
RD000012	Delegate Redistricting Letter	David J. Toscano, Member, Virginia House of Delegates	Mark L. Cole, Member, Virginia House of Delegates	S. Chris Jones, Member, Virginia House of Delegates		2/21/2011	Legislative	Letter between members of the Virginia House of Delegates and shared with consultant advising House Republicans regarding redistricting.
RD000014	Response to Delegate Letter - DRAFT 2	Mark L. Cole, Member, Virginia House of Delegates	David J. Toscano, Member, Virginia House of Delegates	All Delegates		2/26/2011	Legislative	Draft letter between and among Republican members of the Virginia House of Delegates regarding redistricting.
RD000024	Pre-Clearance of Redistricting Plans	Chris Marston, Esq., Counsel to Virginia House Republican Campaign Committee	Bill Howell, Speaker, Virginia House of Delegates; Kirk Cox, Majority Leader, Virginia House of Delegates; Chris Jones, Member, Virginia House of Delegates; Rob Bell, Member, Virginia House of Delegates			2/3/2011	Attorney-client	Legal memorandum from counsel to House Republicans to clients regarding redistricting.

RD000027	Redistricting Letter	N/A	N/A			N/A	Legislative	Draft letter regarding redistricting prepared for members of the Virginia House of Delegates.
RD000028	Redistricting Questions	N/A	N/A			N/A	Legislative; Attorney-client	Talking points regarding redistricting prepared for House Republicans.

Supplemental Log Produced 4/11/2014

Document ID	Subject	From	To	Cc	Bcc	Date	Privilege	Description
000481	Amendments	Chris Marston, Esq., Counsel to House Republican Campaign Committee	Dale Oldham, Esq., Counsel to Republican Members of Virginia House of Delegates			4/2/2011	Attorney-client	Email communications between legal counsel to House Republicans regarding redistricting.
B001329	Legislative Immunity	Paul Haughton, Staff, Virginia House Republican Campaign Committee	Chris Marston, Esq., Counsel to House Republican Campaign Committee; G. Paul Nardo, Staff, Virginia House of Delegates			4/18/2010	Attorney-client	Email communications between legal counsel to Virginia House Republican Caucus and clients regarding and reflecting legal advice concerning redistricting.

Exhibit B

JOHN B. MORGAN
Curriculum Vitae

Education

- Bachelor of Arts degree in History from the University of Chicago, 1991
- Graduated with honors.
- Bachelor's Honors thesis on "The Net Effects of Gerrymandering 1896-1932."
- Demographic study on LaSalle, Illinois was published in *The History of the Illinois and Michigan Canal, Volume Five*.

Employment

- President of Applied Research Coordinates, a consulting firm specializing in political and demographic analysis and its application to elections and redistricting, 2007 to present
- Executive Director, GOPAC (Hon. J.C. Watts, Chairman), 2004-2007
- Vice-President President of Applied Research Coordinates, 1999-2004
- National Field Director, GOPAC (Rep. John Shadegg, Chairman) 1995-1999
- Research Analyst, Applied Research Coordinates 1991-1995
- Research Analyst, Republican National Committee 1988-1989, summers
- Consultant for a number of commissions for redistricting, 1991, 2001, 2011.

Redistricting Background and Experience

- Performed redistricting work in 19 states, in the areas of map drawing, problem-solving and redistricting software operation.
- Performed political work in 40 states, providing analysis and strategy to both statewide and legislative races.

1991-1992 Redistricting Cycle

- Worked on statewide congressional and legislative redistricting plans in the following states:
 - Florida
 - Illinois
 - Indiana
 - Michigan
 - New Jersey
 - New York
 - Pennsylvania
 - Wisconsin
- Focused primarily on Voting Rights Act issues with Black, Hispanic and Asian communities.

- Federal court incorporated portion of legislative plan drafted in part by Morgan for Wisconsin into final decree, finding the configuration superior to other plans in its treatment of minority voters.

2001-2002 Redistricting Cycle

- Worked on statewide congressional and legislative redistricting plans in the following states:
 - Florida
 - Georgia
 - Indiana
 - Iowa
 - New Jersey
 - North Carolina
 - Pennsylvania
 - Rhode Island
 - Virginia
- Dealt with redistricting issues as a member of the Majority Leader's legislative staff in Virginia House of Delegates. Drafted alternate plans for use by the minority parties in Rhode Island. Drafted alternate plans for use by legislative leadership in considering plans drawn by redistricting commission staff in Iowa.

2011-2012 Redistricting Cycle

- Worked on statewide congressional, legislative, and local plans in the following states
 - Connecticut
 - Indiana
 - Georgia
 - Kansas
 - Missouri
 - New Jersey
 - New Mexico
 - North Carolina
 - Ohio
 - Pennsylvania
 - South Carolina
 - Virginia
- Plans drafted by Morgan adopted in whole or part by the following states:
 - Connecticut
 - Indiana
 - Missouri
 - New Jersey
 - New Mexico
 - North Carolina
 - South Carolina
 - Virginia

- Served as a consultant for:
 - Connecticut Redistricting Commission
 - Ohio Reapportionment Board
 - New Jersey Legislative Redistricting Commission
 - New Jersey Congressional Redistricting Commission
 - Pennsylvania Legislative Reapportionment Commission

National Recognition

- Featured speaker at political events and national organizations including:
 - House Republican Conference
 - Woodrow Wilson Institute
 - Campaign Management College
 - State political conventions
- Has appeared on C-SPAN's *Washington Journal*, NPR's *All Things Considered* and also contributes to media stories on redistricting, demographics and politics.

Expert Experience

- Recognized as an expert in demographics and redistricting in *Egolf v. Duran*, New Mexico First Judicial District Court, Case No. D-101-CV-2011-02942, which dealt with New Mexico's legislative plans.
- In *Egolf v. Duran*, the Court adopted a House redistricting plan principally drafted by Morgan.
- Filed expert reports in *Georgia State Conference of NAACP v. Fayette County Board of Commissioners*

Report of John B. Morgan Regarding Plaintiffs' Alternative Plan and the Enacted Plan

Page v. State Board of Elections

Background Information

My name is John B. Morgan. I have been retained by the defendants to offer an expert opinion regarding Plaintiffs' Alternative Plan and the Enacted Plan. I hold a B.A. in History from the University of Chicago. As detailed in my CV, attached as Exhibit A, I have extensive experience in the field of redistricting, working on redistricting plans in the redistricting efforts following the 1990 Census, the 2000 Census, and the 2010 Census. I have testified as an expert witness in demographics and redistricting. I am being compensated at a rate of \$250 per hour for my services in this case.

In preparing this analysis, I considered the following: the legal briefs submitted to the court, reports by Dr. Michael McDonald and Dr. Thomas Brunell, court cases mentioned in the briefs and reports, relevant portions of the Sec. 5 preclearance submissions to the Department of Justice, various maps and datasets from the current and previous congressional districts, the Plaintiffs' Alternative Plan maps and data, the 2010 redistricting PL94-171 data and Census geography data from the Census Bureau, political and redistricting data from the Department of Legislative Services and the Virginia State Board of Elections, and the Maptitude for Redistricting geographic information system (GIS) software and manuals from Caliper Corporation.

The redistricting geographic information system (GIS) software package used for this analysis is Maptitude for Redistricting from Caliper Corporation. The redistricting software was loaded with the census PL94-171 data from the Census and the Census geography as well as available redistricting and political data from Department of Legislative Services and the Virginia State Board of Elections. The full suite of census geography was available, including Census Places, Voting Districts, water bodies, and

3.2% (exclusive) and 3.3% (inclusive). 2/21/14 McDonald, page 8. The Enacted Plan thus did not diminish the ability of black voters to elect their candidates of choice. The Enacted Plan received preclearance from the Department of Justice.

In 2011, Virginia was one of the first states to complete its statewide legislative redistricting and seek Section 5 preclearance from the Department of Justice. The General Assembly passed a redistricting plan for the House of Delegates which required preclearance for the 2011 elections. The benchmark House of Delegates plan had 12 districts in which African-Americans formed a majority of the total and voting age populations. Many of those districts were located in the geography covered by Congressional District 3. During the redistricting process, the House of Delegates considered a number of proposed plans that preserved the 12 majority-black districts. Some of these alternative plans had Black VAP below 55%. House of Delegates Section 5 Submission, Statement of Minority Impact, page 5.

But the House of Delegates plan that the General Assembly enacted had a Black VAP of above 55% in all 12 majority-black districts – including the districts within Congressional District 3. This required increasing the Black VAP in some of the 12 majority-black benchmark districts from the Black VAP level at the time of the 2010 census. Eight of the 12 members of the House of Delegates Black Caucus voted in favor of the Enacted House of Delegates plan. House of Delegates Section 5 Submission, Statement of Minority Impact, page 5.

Thus, the General Assembly enacted, with strong support of bipartisan and black legislators, a House of Delegates redistricting plan with a 55% Black VAP as the floor for black-majority districts subject to Justice Department preclearance under Section 5, including districts within the geography covered by Congressional District 3. The General Assembly therefore had ample reason to believe that legislators of both parties, including black legislators, viewed the 55% black VAP for the House of Delegates districts as appropriate to obtain Section 5 preclearance, even if it meant raising the Black

VAP above the levels in the benchmark plan. The General Assembly acted in accordance with that view for the congressional districts and adopted the Enacted Plan with the District 3 Black VAP at 56.3%

The Alternative Plan, by contrast, decreases District 3's Black VAP by 2.9% and drops it to a razor-thin majority of 50.2% (exclusive) and 51% (inclusive). These levels are below the 55% that the General Assembly found appropriate to comply with Section 5 for House Districts.

Dr. McDonald states that "a racial bloc voting analysis" is required to prove what Black VAP is necessary to comply the Voting Rights Act. 1/20/14 McDonald, page 11. Dr. McDonald provides no such analysis of the Alternative Plan. Thus Dr. McDonald cannot – and does not – opine that the Alternative Plan could or would have received preclearance under Section 5.

Therefore the Alternative Plan would have presented obstacles to obtaining Section 5 preclearance that the Enacted Plan did not present. The Alternative Plan drops District 3's Black VAP well below the 55% that the General Assembly believed was appropriate to obtain preclearance for House Districts and decreases District 3's Black VAP to a razor-thin majority below the Benchmark Black VAP level. Had the Alternative Plan been before it, the General Assembly had ample reason to prefer the Enacted Plan, which increased District 3's Black VAP above 55% and faced none of these hurdles to achieving Section 5 preclearance.

The Alternative Plan Does Not Bring About Significantly Greater Racial Balance Than the Enacted Plan

I have been asked to analyze whether the Alternative plan brings about "significantly greater racial balance" than the Enacted Plan. As I understand it, the purpose of this requirement is to cure the alleged racial gerrymander and turn the gerrymandered district into one that is not racially identifiable. The Alternative Plan fails that purpose because it preserves District 3 as a racially identifiable majority-

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA

RICHMOND DIVISION

DAWN CURRY PAGE, an individual;
GLORIA PERSONHUBALLAH, an
individual; JAMES FARKAS, an individual,
Plaintiffs,

v.

CHARLIE JUDD, in his capacity as Chairman
of the Virginia State Board of Elections;
KIMBERLY BOWERS, in her capacity as
Vice-Chair of the Virginia State Board of
Elections; DON PALMER, in his capacity as
Secretary of the Virginia State Board of
Elections,

Defendant.

Civil Action No. 3:13-cv-678

**ORDER DENYING MOTION TO QUASH AND GRANTING PLAINTIFFS' MOTION
TO ENFORCE SUBPOENA**

Upon consideration of the Motion to Quash Subpoena to Christopher Marston and/or for a Protective Order (“Motion to Quash”) and Plaintiffs’ Motion to Enforce Subpoena (“Motion to Enforce”), the Court having considered the Motions, the Memoranda of Points and Authorities in support thereof, the opposition, and any oral argument, and it appearing to the Court after due deliberation that the relief requested is appropriate, it is by the Court this ___ day of _____, 2014,

ORDERED, that the Motion to Quash be denied; and it is further

ORDERED, that the Motion to Enforce is granted, and that Christopher Marston is hereby ordered to produce to Plaintiffs all documents listed on the privilege log attached to the Motion to Enforce as Exhibit A.

The Honorable
United States Judge

Richmond, Virginia

Date: _____, 2014