IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

TENNESSEE STATE CONFERENCE OF THE NAACP et al.,	)	
Plaintiffs,	)	No. 3:23-cv-00832
v.	)	JUDGE ELI RICHARDSON JUDGE ERIC E. MURPHY
WILLIAM B. LEE et al.,	)	JUDGE BENITA Y. PEARSON
Defendants	)	MAGISTRATE JUDGE ALISTAIR E. NEWBERN

PLAINTIFFS' REPLY IN SUPPORT OF THEIR MOTION TO COMPEL AND PLAINTIFFS' OPPOSITION TO NON-PARTY LEGISLATORS' MOTION TO QUASH AND FOR A PROTECTIVE ORDER

Nashville, TN 37243

(615) 741-1195

House Redistricting Committee - TN General Assembly (select "plans" tab to navigate to the maps and map books listed under each corresponding bill)

From: Sharon Lurie <slurie@mainstreetmediatn.com>
Sent: Thursday, January 13, 2022 12:09 AM
To: Doug Himes <doug.himes@capitol.tn.gov>
Subject: Redistricting for Cheatham and Dickson Counties

Dear Doug:

I am a reporter with Main Street Media of Tennessee, and I am the staff writer for the newspapers *The Cheatham County Exchange* and *The Dickson Post*. I understand the state legislature is voting or has voted on redistricting based on the results of the 2020 census. Can you tell which changes, if any, will be made in voting districts in Cheatham and Dickson Counties, please?

Thank you, and I look forward to hearing from you.

Sincerely,

Sharon Lurie

EXHIBIT 13

Doug Himes

From: Kate Donovan <kate@redistrictingdatahub.org>
Sent: Thursday, May 13, 2021 3:45 PM
To: Doug Himes
Subject: Re: Official receiver for apportionment data?

Doug - thai is great, thank you so much for your confirmation!

Take care,

Kate

On Thu, May 13, 2021 at 4:42 PM Doug Himes <doug.himes@capitol.tn.gov> wrote:

Hi Kate,

I am doing well. I hope you are too.

I can confirm that the House is using Maptitude for Redistricting again this cycle. I can also confirm that the Senate plans to use the ESRI application for redistricting.

As for GIS, we should have folks on board sometime next month – please check back in mid-June and I may have contact information for you.

Best wishes,

Doug

From: Kate Donovan <kate@redistrictingdatahub.org>
Sent: Tuesday, May 11, 2021 4:06 PM
To: Doug Himes <doug.himes@capitol.tn.gov>
Subject: Re: Official receiver for apportionment data?

Hi Doug - I hope you have been well!

I am writing with a redistricting question (of course!) but something a bit different; I'm trying to find out what mapping software the legislature is using this cycle. I just got off the phone with Matthew Hill and he said he was 99% confident that the House was using Maptitude; would you be able to confirm that?

Also, I was wondering if you happened to know what software the Senate is using? (The rumor is ESRI, but I would like to confirm.) If you aren't sure about the Senate, might you have a contact point for someone who could answer this question? I could not find a redistricting committee for the Senate.

Thank you very much,

Kate

On Tue, Mar 30, 2021 at 10:25 AM Doug Himes <doug.himes@capitol.tn.gov> wrote:

Hi Kate,

Thank you for checking. We have not hired anyone for the GIS position at this time. As the end of our legislative session is approaching (late April/early May), I am unsure if the position will be filled prior to adjournment. But, please feel free to check back at any time.

Hope all else is well for you.

Best, Doug

From: Kate Donovan <kate@redistrictingdatahub.org>
Sent: Tuesday, March 30, 2021 9:19 AM
To: Doug Himes <doug.himes@capitol.tn.gov>
Subject: Re: Official receiver for apportionment data?

Hi Doug - I hope you are well. I may still be jumping the gun a bit, given the lengthy delays in the census data this year, but I wanted to check in and see if you had hired anyone for the legislative GIS position? As a reminder, I am trying to identify the designated census liaison, which is a role taken on by the legislative GIS staffer, if I understood you correctly.

If you have not hired anyone yet, I will try back again in a few weeks.

Thank you kindly!

Kate

On Fri, Mar 5, 2021 at 2:06 PM Kate Donovan <kate@redistrictingdatahub.org> wrote:

> Hi Doug - thanks for the reply, and no apologies necessary. The census delay has certainly thrown a wrench in the system, to say the least...
>
> I appreciate the response, and will be sure to follow up with you in a couple of weeks. Have a great weekend, as well.
>
> Kate
>
> On Fri, Mar 5, 2021 at 1:54 PM Doug Himes <doug.himes@capitol.tn.gov> wrote:
>
> > Hi Kate,
> >
> > Sorry for the delayed reply. I was hoping I'd have a better answer at this point. Our legislative GIS position is unfilled at this time. The House has designated Caliper Corporation to receive our state level redistricting data when it is released. For the time being, I will receive the cd versions of the data.
> >
> > As for our Comptroller's Office of Local Government, Matthew Hill is the GIS specialist who coordinates their efforts in assisting county governments with redistricting. Matthew can be reached at: Matthew.Hill@cot.tn.gov.
> >
> > If you'd like to check back in a few weeks, I may have a better legislative census data contact for you.

Have a good weekend,

Best, Doug

From: Kate Donovan <kate@redistrictingdatahub.org>
Sent: Monday, March 1, 2021 3:36 PM
To: Doug Himes <doug.himes@capitol.tn.gov>
Subject: Re: Official receiver for apportionment data?

Hi Doug - I hope you are well. As you suggested, I am following up with you about my question regarding the designated census liaison. (You can see our previous emails for context below, if that helps.) You had mentioned previously that typically "an individual in our Comptroller's Office of Local Government and a GIS position within the legislature" have served as the official receivers of the data. Would you happen to know the names of these individuals at this date?

Thank you kindly,

Kate

On Tue, Jan 19, 2021 at 10:38 AM Kate Donovan <kate@redistrictingdatahub.org> wrote:

> Hi Doug - thank you for this information, and your quick reply. I will heed your advice and follow up in a month to find out exactly who in the Comptroller's Office and the GIS specialist in the legislature is responsible for maintaining the data.
>
> Gratefully,
>
> Kate
>
> On Fri, 15 Jan 2021 at 17:42, Doug Himes <doug.himes@capitol.tn.gov> wrote:
>
> > Hi Kate,

Thank you for your email. It is actually the first received since launching our House Redistricting webpage yesterday. We're hopeful that Tennessee citizens and organization, as well as organizations like yours, utilize me as a contact for questions, comments and concerns as we get ever closer to redistricting this cycle.

As to data, in normal years, both an individual in our Comptroller's Office of Local Government and a GIS position within the legislature have received data (both geographic and state-level redistricting). In addition, the TN House uses the Caliper/Maptitude platform which includes/stores the data information. I have a sense that the Census Bureau has not sent the official data designation letters to the states yet. You might check back with me in mid-February for an update on this.

I enjoyed looking at the Redistricting Data Hub website. I think there's some really good and useful information on it.

Let me know if I can address an follow-up questions.

Best wishes, and have a great weekend,

Doug Himes

House Ethics Counsel

638 Cordell Hull Building

Nashville, TN 37243

(615) 741-1195

From: Kate Donovan <kate@redistrictingdatahub.org>
Sent: Friday, January 15, 2021 12:10 PM
To: Doug Himes <doug.himes@capitol.tn.gov>
Subject: Official receiver for apportionment data?

Hi Doug - I hope this email finds you well.

I am hoping to find out who is responsible for receiving and managing the PL 94-171 Census apportionment data for Tennessee during the 2021 redistricting cycle. I understand that the data file is sent to the governor and legislative leaders by law. But I believe there is also a specific person (or persons) - designated by the state - who is responsible for receiving and storing the data file, such as a GIS specialist, demographer, or legislative liaison. I found your contact information through this website, and any information you can provide would be greatly appreciated!

Thank you kindly,

Kate

--

Kathleen Donovan, Ph.D.

Support Specialist

Redistricting Data Hub

https://www.redistrictingdatahub.org/