

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

TERRY PETTEWAY, THE
HONORABLE DERRECK ROSE,
and PENNY POPE,

Plaintiffs,

v.

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

Defendants.

Civil Action No. 3:22-cv-57

UNITED STATES OF AMERICA,

Plaintiff,

v.

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

Defendants.

Civil Action No. 3:22-cv-93

DICKINSON BAY AREA BRANCH
NAACP, GALVESTON BRANCH
NAACP, MAINLAND BRANCH
NAACP, GALVESTON LULAC
COUNCIL 151, EDNA COURVILLE,
JOE A. COMPIAN, and LEON
PHILLIPS,

Civil Action No. 3:22-cv-117

Plaintiffs, §

v. §

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

Defendants. §

[PROPOSED] PLAINTIFFS’ PRETRIAL ORDER

Pursuant to the Court’s Order, Plaintiffs, Terry Petteway, the Honorable Derreck Rose, and Penny Pope (the “Petteway Plaintiffs”); Plaintiff United States of America; and Plaintiffs Dickinson Bay Area Branch NAACP, Galveston Branch NAACP, Mainland Branch NAACP, Galveston LULAC Council 151, Edna Courville, Joe A. Compian, and Leon Phillips (the “NAACP Plaintiffs”) file the following Pretrial Order.

1. **Appearance of Counsel**

Petteway Plaintiffs

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2. Statement of the Case

Terry Petteway, Penny Pope, Derreck Rose, Dickinson Bay Area Branch NAACP, Mainland Branch NAACP, Galveston Branch NAACP, Galveston LULAC Council 151, Edna Courville, Joe A. Compian, and Leon Phillips allege the new County Commissioners precincts adopted by the Galveston County Commissioners Court in November 2021 as racially gerrymandered, adopted with discriminatory purpose, and unlawfully diluting the votes of Galveston's Black and Latino voters.

The United States alleges that the Galveston County Commissioners Court plan enacted on November 12, 2021, violates Section 2 of the Voting Rights Act, 52 U.S.C. § 10301, because it has the result of denying Black and Hispanic voters an equal opportunity to participate in the political process and to elect representatives of their choice by diluting their voting strength, and it was adopted, at least in part, with the intent to discriminate.

3. Pending Motions

None.

4. Exhibit Lists

Attached to this Pretrial Order are the following Exhibit Lists:

Plaintiffs' Exhibit List
Defendants' Exhibit List with Plaintiffs' Objections
Joint Exhibit List

5. Witnesses

Attached to this Pretrial Order are the following Witness Lists:

Plaintiffs' Witness List
Plaintiffs' Objections to Defendants' Witness List

In the event there are any other witnesses to be called at the trial, their names, addresses and the subject matter of their testimony will be provided to opposing counsel as soon as they are known. This restriction shall not apply to rebuttal or impeaching witnesses, the necessity of whose testimony cannot reasonably be anticipated before the time of trial.

6. Stipulation of Facts

Attached to this Pretrial Order is the Joint Stipulation of Facts.

7. Trial

This matter is a bench trial.

Plaintiffs anticipate that their case in chief to will take approximately 40 hours to present.

8. Additional Required Attachments

None.

SIGNED this _____ day of July, 2023.

JEFFREY VINCENT BROWN
UNITED STATES DISTRICT JUDGE

Respectfully submitted this 18th day of July, 2023,

/s/ Chad W. Dunn

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COUNSEL FOR THE UNITED STATES

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on July 18, 2023, the foregoing document, its appendix, and its exhibits were filed electronically (via CM/ECF), and that all counsel of record were served by CM/ECF.

/s/ Sarah Xiyi Chen

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

DICKINSON BAY AREA BRANCH §
NAACP, et al., §
§
Plaintiffs, §
§
v. § Civil Action No. 3:22-cv-117- JVB
§
GALVESTON COUNTY, TEXAS, et al., §
§
Defendants. §

TERRY PETTEWAY, et al., §
§
Plaintiffs, §
§
v. § Civil Action No. 3:22-cv-57-JVB
§ [Lead Consolidated Case]
§
GALVESTON COUNTY, TEXAS, et al., §
§
Defendants. §

UNITED STATES OF AMERICA, §
§
Plaintiff, §
§
v. § Civil Action No. 3:22-cv-93-JVB
§
GALVESTON COUNTY, TEXAS, et al., §
§
Defendants. §

CONSOLIDATED PLAINTIFFS' EXHIBITS

Petteway v. Galv. Cnty., 3:22-cv-57
Consolidated Plaintiffs' Objections to Defendants' Exhibits

No.	Description	Beg Bates	End Bates	Offer	Obj.	Date Admit	Date Deny
PX 1	United States March 10, 1976, letter to the City of Texas from the Attorney General interposing a Section 5 objection to the numbered post provision governing the election of City Commissioners in Texas City	US00000 01	US00000 02				
PX 2	United States March 17, 1992, letter to Galveston County from the Attorney General interposing a Section 5 objection to the the 1991 redistricting plan for justice of the peace/constable districts in Galveston County, Texas	US00000 03	US00000 04				
PX 3	United States December 14, 1992, letter to the City of Galveston from the Attorney General interposing a Section 5 objection	US00000 05	US00000 07				
PX 4	United States December 14, 1998, letter to the City of Galveston from the Attorney General interposing a Section 5 objection	US00000 08	US00000 12				
PX 5	OMB Guidance on Aggregation and Allocation of Data on Race for Use in Civil Rights Monitoring and Enforcement	Attachme nt A to U.S. RFA's served March 22, 2023	N/A				
PX 6	May 1, 2005 Article by J. Alford et al., <i>Are Political Orientations Genetically Transmitted?</i>	N/A	N/A				
PX 7	Beirne, Maynard & Parsons L.L.P. 2010 Statement of Qualifications	DEFS000 36850	DEFS000 36875				
PX 8	Nov. 4, 2010 Email from E. Courville to S. Holmes re Temporary Appointe for JP Position, Precinct 3	NAACP0 0000532	NAACP0 0000532				
PX 9	Nov. 9, 2010 Email from J. Compian to S. Holmes re Follow up to our morning meeting of today	NAACP0 0000544	NAACP0 0000544				

Petteway v. Galv. Cnty., 3:22-cv-57
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No.	Description	Beg Bates	End Bates	Offer	Obj.	Date Admit	Date Deny
PX 10	2011 Commissioner Proposal A Map	DEFS000 31604	DEFS000 31604				
PX 11	Commissioner Districts Total Population, VAP Breakdowns for 2011 Redistricting Proposals	DEFS000 31605	DEFS000 31606				
PX 12	Mar. 2011 Article by E. Carmines et al., <i>On the Meaning, Measurement, and Implications of Racial Resentment</i>	N/A	N/A				
PX 13	Mar. 9, 2011 Email from K. Clark to C. Mabry re: FW: Redistricting	DEFS000 09623	DEFS000 09623				
PX 14	Mar. 10, 2011 Email from S. Holmes to M. Henry re: Redistricting	DEFS000 09694	DEFS000 09696				
PX 15	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 16	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 17	May 16, 2011 Letter to M. Henry from Beirne Maynard & Parsons L.L.P. re: 2011 Redistricting of Galveston County Commissioners Precincts, Justice of the Peace Precincts, Constable Precincts, Election Precincts and Pre-Clearance Submission Project, Engagement Letter (Agenda Item #12)	N/A	N/A				
PX 18	May 24, 2011 Email from R. Lewis to M. Henry re: Resolution you needed typed, attaching Galveston County Resolution Adopting Criteria for Use in Redistricting 2011 Process	DEFS000 15166	DEFS000 15169				
PX 19	Jun. 2, 2011 Email from P. Grady to R. Lewis re June 7th agenda	US00021 92	US00022 02				
PX 20	Jun. 7, 2011 Email from R. Lewis to M. Henry re: Rules for Redistricting, attaching Galveston County Resolution Adopting Criteria for Use in Redistricting 2011 Process	DEFS000 15170	DEFS000 15173				
PX 21	Jun. 12, 2011 Email to J. Compian re: Galveston Housing Authority actions involving Harish	NAACP0 0001048	NAACP0 0001052				

Petteway v. Galv. Cnty., 3:22-cv-57
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No.	Description	Beg Bates	End Bates	Offer	Obj.	Date Admit	Date Deny
PX 22	Jun. 14, 2011 Email from M. Jackson to J. Compian re: Fwd: Galveston Housing Authority actions involving Harish	NAACP0000981	NAACP0000987				
PX 23	Jun. 24, 2011 Email from S. Holmes to P. Doyle re: Nixon	DEFS00032393	DEFS00032394				
PX 24	Withdrawn by agreement of all parties.						
PX 25	Jun. 27, 2011 Email from J. Compian to L. Murrell et al. re: subject.. Where are we?	NAACP00001077	NAACP00001079				
PX 26	Jul. 25, 2011 Summary of GCI Meeting Held July 12th	NAACP00000872	NAACP00000883				
PX 27	Aug. 3, 2011 Email from J. Nixon to M. Henry re Data for you to Send to Galveston County, attaching Data on JP-Constable Proposal, et al.	DEFS00031578	DEFS00031582				
PX 28	Withdrawn by agreement of all parties.						
PX 29	Aug. 3, 2011 Email from M. Henry to M. Henry re: Fwd: Data for you to Send to Galveston County, attaching Data on JP-Constable Proposal, et al.	DEFS00031583	DEFS00031590				
PX 30	Aug. 5, 2011 Email from S. Holmes to P. Doyle et al. re: Proposal 3, attaching Proposal 3	DEFS00005602	DEFS00005603				
PX 31	Aug. 5, 2011 Email from N. Sigler to M. Fitzgerald re: Proposals Voting Precincts, attaching proposal 1 commis vote, et al.	DEFS00007887	DEFS00007890				
PX 32	Aug. 5, 2011 Email from M. Fitzgerald to M. Henry et al. re: FW: Proposals Voting, attaching proposal 2 commis vote, et al.	DEFS00009624	DEFS00009627				
PX 33	Aug. 5, 2011 Email from M. Fitzgerald to S. Holmes re: FW: Proposal 3, attaching Proposal 3	DEFS00010034	DEFS00010035				
PX 34	Withdrawn by agreement of all parties.	-	-	-	-	-	-

Petteway v. Galv. Cnty., 3:22-cv-57
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No.	Description	Beg Bates	End Bates	Offer	Obj.	Date Admit	Date Deny
PX 35	Aug. 5, 2011 Email from S. Holmes to K. Clark re: FW: Proposal 3, attaching Proposal 3	DEFS000 11506	DEFS000 11507				
PX 36	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 37	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 38	Aug. 10, 2011 Email from P. Grady to M. Henry re: WEB POSTING FOR REDISTRICTING	DEFS000 09697	DEFS000 09697				
PX 39	Aug. 10, 2011 Email from N. Sigler to M. Fitzgerald re: FW: Proposal, attaching Proposal 3 commis vote, et al.	DEFS000 19401	DEFS000 19406				
PX 40	Aug. 22, 2011 Resolution No. 1165 from the City of La Marque re: 2011 Justice of the Peace/Constable Plan	DEFS000 29502	DEFS000 29504				
PX 41	Aug. 24, 2011 Email from N. Sigler to M. Fitzgerald re: Voting precinct splits, attaching Voting Precinct Splits Proposal 3 Commis, et al.	DEFS000 07913	DEFS000 07919				
PX 42	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 43	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 44	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 45	Aug. 29, 2011 Email from T. Trainor to M. Henry re FW: Updated map based on news report/public comment, attaching Commissioner Proposal 1A, JP Proposal, etc.	DEFS000 31597	DEFS000 31607				
PX 46	Withdrawn by agreement of all parties.	-	-	-	-	-	-

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No.	Description	Beg Bates	End Bates	Offer	Obj.	Date Admit	Date Deny
PX 47	Oct. 3, 2011 Letter from T. Perez, Assistant Attorney General, to C. Robert Heath, Esq. of Bickerstaff Heath Delgado Acosta, declining to withdraw the Dec. 14, 1998, objection interposed under Section 5, to a charter amendment that changes the method of election for the city council from six single-member districts to four single-member districts, with two members elected at large to numbered posts	US00000 13	US00000 16				
PX 48	Oct. 7, 2011 Email from B. Chapman to P. Grady re: Needed information!	DEFS000 09601	DEFS000 09601				
PX 49	Oct. 21, 2011 Email from TJ Aulds to M. Henry re: Redistricting	DEFS000 09704	DEFS000 09705				
PX 50	Email from V. Vam Horn to P. Ready et al. re: 2010 census redistricting order (October 26, 2011), attaching Redistricting Order Establishing New JP Precinct Boundaries, et al.	DEFS000 29205	DEFS000 29364				
PX 51	Oct. 28, 2021 Block Assignment File	DEFS000 18660	DEFS000 18660				
PX 52	Nov. 22, 2011 Email from P. Grady to D. Apffel et al. re: Notice of Order Enjoining the Implementation of Voting Changes, attaching Order Enjoining the Implementation of Voting Changes	DEFS000 10522	DEFS000 10525				
PX 53	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 54	Jan. 17, 2012 Email from P. Toliver to A. Rubio et al. re: Meeting tonight. Galveston County Colition for Justice	NAACP0 0001472	NAACP0 0001472				
PX 55	Mar. 6, 2012 Email from D. Sullivan to B. Sargent re: DOJ Says NO to Galveston Redistricting	DEFS000 10474	DEFS000 10474				

Petteway v. Galv. Cnty., 3:22-cv-57
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No.	Description	Beg Bates	End Bates	Offer	Obj.	Date Admit	Date Deny
PX 56	Mar. 10, 2012 Email from T. Bowie to A. Hypoli et al. re: Pack The County Commissioners' Court on 3/13/12	N/A	N/A				
PX 57	Mar. 12, 2012 Email from S. Holmes to S. Holmes re FW: Proposal 3, attaching Proposal 3	DEFS000 16204	DEFS000 16205				
PX 58	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 59	Mar. 15, 2012 Email from M. Fitzgerald to M. Henry et al. re: FW: Commissioner Precincts, attaching Commissioners Proposal (Discussions Only)	DEFS000 11520	DEFS000 11521				
PX 60	Mar. 15, 2012 Letter from J. Garza et al. to M. Bell-Platts, Deputy Chief of the Voting Section, re: <i>Galveston County v. United States of America, et al.</i> Ca No. 1:11-cv-1837	US00011 65	US00011 68				
PX 61	Mar. 20, 2012 Email from W. Sargent to S. Williams et al. re: FW: Commissioner Proposal (For Settlement Discussion Only), attaching Commissioner Proposal For Settlement Discussion Only	DEFS000 20536	DEFS000 20538				
PX 62	Apr. 5, 2012 Texas Observer Article by F. Wilder, <i>Galveston's Nasty Public Housing Fight</i> , https://www.texasobserver.org/galvestons-nasty-public-housing-fight/	N/A	N/A				
PX 63	Feb. 1, 2013 Email from S. Holmes to M. Henry re: Revised	DEFS000 29429	DEFS000 29429				
PX 64	Feb. 5, 2013 Email from D. Allen to C. Johnson et al. re: Commissioners Court Update for 2013-2014 Redistricting Plans	DEFS000 16466	DEFS000 16466				

Petteway v. Galv. Cnty., 3:22-cv-57
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No.	Description	Beg Bates	End Bates	Offer	Obj.	Date Admit	Date Deny
PX 65	Aug. 21, 2013 Email from R. Dennard to T. Drummond re: Chronicle article today	DEFS000 29119	DEFS000 29121				
PX 66	Dec. 30, 2013 Transcript of Oral Deposition of Judge Mark Henry	N/A	N/A				
PX 67	Jan. 16, 2014 Bench Trial Transcript before Hon. Gregg Costa (Vol. 3), Civ. Action No. 3:13-CV-308 (S.D. Tx.)	N/A	N/A				
PX 68	May 20, 2014 Galveston County Daily News Article by T.J. Aulds, <i>Giusti accused of earning county pay on private job</i> , https://www.galvnews.com/news/local_news/giusti-accused-of-earning-county-pay-on-private-job/article_ca67c0c8-dfd9-11e3-a2a7-0017a43b2370.html	N/A	N/A				
PX 69	May 30, 2014 Galveston County Daily News Article by C. Smith Gonzalez and T.J. Aulds, <i>LM police group calls for investigation after alleged racist remarks</i> , https://www.galvnews.com/news/free/lm-police-group-calls-for-investigation-after-alleged-racist-remarks/article_077059c8-e83e-11e3-8b66-001a4bcf6878.html	N/A	N/A				
PX 70	Jun. 4, 2014 Click2Houston.com Article by J. Eisenbaum, <i>Member of La Marque city council recorded making racist remarks</i> , https://www.click2houston.com/news/2014/06/04/member-of-la-marque-city-council-recorded-making-racist-remarks/	N/A	N/A				

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No.	Description	Beg Bates	End Bates	Offer	Obj.	Date Admit	Date Deny
PX 71	Aug. 12, 2014 Chron. Article by H. Rice, <i>La Marque councilwoman faces recall vote</i> , https://www.chron.com/neighborhood/bayarea/news/article/La-Marque-councilwoman-faces-recall-5684601.php	N/A	N/A				
PX 72	Nov. 4, 2014 Galveston County General and Special Election Results from the Galveston County Website, https://www.galvestonvotes.org/home/showpublisheddocument/7305/637595458881430000	N/A	N/A				
PX 73	Aug. 21, 2015 D. Apffel Tweet re: Oath Keepers	N/A	N/A				
PX 74	Aug. 31, 2015 D. Apffel Tweet re: Houston Chronicle article	N/A	N/A				
PX 75	Nov. 12, 2015 Chron. Article by A. Baird, <i>La Marque ISD strives to leave troubles behind</i> , https://www.chron.com/neighborhood/bayarea/news/article/La-Marque-ISD-strives-to-leave-troubles-behind-6491582.php	N/A	N/A				
PX 76	Jan. 24, 2016 D. Apffel Facebook post	N/A	N/A				
PX 77	Mar. 17, 2016 Cambridge University Press Article by K. Imai et al., <i>Improving Ecological Inference by Predicting Individual Ethnicity from Voter Registration Records</i>	N/A	N/A				

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No.	Description	Beg Bates	End Bates	Offer	Obj.	Date Admit	Date Deny
PX 78	Aug. 16, 2017 Galveston County Daily News Article by J. Wayne Ferguson, <i>Political Buzz: Henry says 'no' to removing Galveston's Confederate statute</i> , https://www.galvnews.com/news/article_4dd6245b-6917-5b86-b756-5f3b38e8f2b7.html	N/A	N/A				
PX 79	Jan. 8, 2018 Big Jolly Politics Article by D. Jennings, <i>Cheryl Johnson at odds with Galveston County Judge Mark Henry</i> , https://bigjolly.com/cheryl-johnson-at-odds-with-galveston-county-judge-mark-henry/	N/A	N/A				
PX 80	Apr. 3, 2018 Video titled Dr. Armstrong, Where were they Run Off may 14 18 Election Day May 22, http://www.kenclark.org/where-were-they-then.php	N/A	N/A				
PX 81	Apr. 16, 2018 Texas Tribune Article by E. Walters, <i>It's our form of apartheid": How Galveston stalled public housing reconstruction in the 10 years after Ike</i> , https://www.texastribune.org/2018/04/16/galveston-public-affordablehousing-hurricane-ike	N/A	N/A				
PX 82	Jul. 16, 2018 Letter from Allison, Bass & Magee, L.L.P. to Hon. Mark Henry re: Commissioners Court Precinct Redistricting	DEFS000 29919	DEFS000 29931				
PX 83	Jul. 23, 2018 Email from D. Martinez to M. Henry re: Allison Bass & Magee, attaching Jul. 16, 2018 Letter from Allison, Bass & Magee, L.L.P. to Hon. Mark Henry re Commissioners Court Precinct Redistricting	DEFS000 11855	DEFS000 11868				

Petteway v. Galv. Cnty., 3:22-cv-57
Consolidated Plaintiffs' Objections to Defendants' Exhibits

No.	Description	Beg Bates	End Bates	Offer	Obj.	Date Admit	Date Deny
PX 84	Jul. 23, 2018 Email from T. Drummond to B. Boemer et al. re: Allison Bass & Magee, attaching Jul. 16, 2018 Letter from Allison, Bass & Magee, L.L.P. to Hon. Mark Henry re Commissioners Court Precinct Redistricting	DEFS000 29122	DEFS000 29136				
PX 85	Oct. 18, 2018 Email to M. Shannon re: FW: PSAP Workshop #2 Summary	DEFS000 19470	DEFS000 19471				
PX 86	Feb. 4, 2019 Houston Public Media Article by E. Trovall, <i>More Civil Rights Groups Sue Over Secretary Of State's Advisory On Potential Voter Fraud</i> , https://www.houstonpublicmedia.org/articles/news/texas/2019/02/04/320452/more-civil-rights-groups-sue-over-secretary-of-states-advisory-on-potential-voter-fraud/	N/A	N/A				
PX 87	May 15, 2019 Email to M. Shannon re: CENSUS TAB BLOCKS & POPULATION DATA	DEFS000 19474	DEFS000 19475				
PX 88	May 16, 2019 Email from B. Andrews to N. Sigler re: 2020 PSAP External Participant Final Data Upload for Galveston County	DEFS000 19478	DEFS000 19480				
PX 89	Oct. 8, 2019 Email from K. Yancy to N. Paul et al. re: Info Brochure we gave out at Mainland NAACP concerning LM schools and Galveston County community at large, attaching INFO brochure	N/A	N/A				
PX 90	Oct. 25, 2019 Email to D. Sullivan, attaching Election Day Locations (revised) et al.	DEFS000 08042	DEFS000 08044				

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No.	Description	Beg Bates	End Bates	Offer	Obj.	Date Admit	Date Deny
PX 91	Nov. 14, 2019 Email to R. Brezik et al. re: Workshop for Geography and Census Data, attaching Galveston County powerpoint	DEFS000 04571	DEFS000 04572				
PX 92	Dec. 8, 2019 Texas Tribune Article by P. Svitek, <i>Top Texas Republicans pressure a county chair to resign over racist text</i> , https://www.texastribune.org/2019/12/07/texas-republicans-racist-text-resign/	N/A	N/A				
PX 93	Withdrawn by agreement of all parties.						
PX 94	Withdrawn by agreement of all parties.						
PX 95	Jan. 29, 2020 Email from D. Mendez to K. Clark re: Redistricting Estimate for Galveston County, attaching Jan. 29, 2020 Letter from Bickerstaff Heath Delgado Acosta LLP to K. Clark re: Redistricting Budget	DEFS000 28117	DEFS000 28119				
PX 96	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 97	Jan. 31, 2020 Email from K. Clark to D. Martinez re: Redistricting Budget Letter, attaching Jan. 29, 2020 Letter from Bickerstaff Heath Delgado Acosta LLP to K. Clark re: Redistricting Budget	DEFS000 28124, DEFS000 29962	DEFS000 29963				
PX 98	Feb. 6, 2020 Letter from Allison, Bass & Magee, L.L.P. to Hon. Mark Henry re Commissioners Court Precinct Redistricting	DEFS000 29966	DEFS000 29979				

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No.	Description	Beg Bates	End Bates	Offer	Obj.	Date Admit	Date Deny
PX 99	Feb. 18, 2020 Email from D. Martinez to M. Henry re: Allison Bass & Magee RE: Commissioners' Court Redistricting, attaching Feb. 6, 2020 Letter from Allison, Bass & Magee, L.L.P. to Hon. Mark Henry re Commissioners Court Precinct Redistricting	DEFS000 29137	DEFS000 29151				
PX 100	Feb. 18, 2020 Email from M. Henry to M. Henry re: Fwd: Allison Bass & Magee RE: Commissioners' Court Redistricting, attaching Feb. 6, 2020 Letter from Allison, Bass & Magee, L.L.P. to Hon. Mark Henry re Commissioners Court Precinct Redistricting	DEFS000 29430, DEFS000 29434	DEFS000 29447				
PX 101	Feb. 21, 2020 C. Johnson Tweet	DEFS000 31247	DEFS000 31247				
PX 102	Feb. 22, 2020 Galveston County Daily News Article by J. Wayne Ferguson, <i>Johnson: Peden ad 'racist,' 'discriminatory,' and a 'lie.,'</i> https://www.galvnews.com/news/free/article_1f26ee77-55ca-5723-a493-28fdd78f15c5.html	N/A	N/A				
PX 103	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 104	Feb. 23, 2020 C. Johnson Tweet	DEFS000 31248	DEFS000 31248				
PX 105	Mar. 11, 2020 Email from K. Saludis to N. Sigler re: link	DEFS000 10340	DEFS000 10341				
PX 106	Mar. 27, 2020 First Amended Complaint for Injunctive and Declaratory Relief in <i>Bruni et al. v. Hughs</i> , Civ. No. 5:20-cv-35 (S.D. Tx.)	N/A	N/A				

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No.	Description	Beg Bates	End Bates	Offer	Obj.	Date Admit	Date Deny
PX 107	Apr. 10, 2020 NPR Article by V. Romo, <i>COVID-19 Patients Given Unproven Drug In Texas Nursing Home In 'Disconcerting' Move</i> , https://www.npr.org/2020/04/10/830348837/covid-19-patients-given-unproven-drug-in-texas-nursing-home-garnering-criticism	N/A	N/A				
PX 108	Selected Socio Economic Data, Galveston County, Texas, Single-Race African Americans and Latinos vis-à-vis Non-Hispanic Whites (2015-2019 American Community Survey 5-Year Estimates)	N/A	N/A				
PX 109	Jun. 29, 2020 Galveston County Daily News Article by J. Wayne Ferguson, <i>COVID rise greater in Galveston County's Hispanic residents</i> , https://www.galvnews.com/news/free/article_85d437e7-02b8-5ec6-9999-dd3b9ac211da.html	N/A	N/A				
PX 110	Jul. 1, 2020 Galveston County Daily News Article by A. Mann, <i>Replace Confederate statue with Juneteenth monument</i> , https://www.galvnews.com/opinion/guest_columns/article_21ab648d-bfc0-5855-a1be-7ffaccbce899.html	N/A	N/A				
PX 111	Jul. 17, 2020 Galveston County Daily News Article by M. Degrood, <i>Galveston County law enforcement works on diversity</i> , https://www.galvnews.com/news/police/free/article_036c2431-b464-5eee-aad4-5164645122ae.html	N/A	N/A				

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No.	Description	Beg Bates	End Bates	Offer	Obj.	Date Admit	Date Deny
PX 112	Aug. 24, 2020 Houston Chronicle Article by B. A. Lewis, <i>Confederate statue in Galveston County will stay put — for now</i> , https://www.houstonchronicle.com/news/houston-texas/houston/article/Confederate-statue-in-Galveston-County-will-stay-15511484.php	N/A	N/A				
PX 113	Sept. 23, 2020 Galveston County Daily News Article by J. Wayne Ferguson, <i>Political Buzz: Galveston County Judge Henry joins GOP lawsuit to block earlier voting start</i> , https://www.galvnews.com/news/free/political-buzz-galveston-county-judge-henry-joins-gop-lawsuit-to-block-earlier-voting-start/article_41f7e1f7-74df-56a2-ba73-231dc5ca3c55.html	N/A	N/A				
PX 114	Oct. 12, 2020 Email from M. Shannon to K. Clark re: FW: voting precincts, attaching Voting Precincts Breakdown	DEFS000 03873	DEFS000 03874				
PX 115	Oct. 12, 2020 CNN Article by H. Kaur and M. Alonso, <i>A Black man who was led through Galveston, Texas, by police officers on horseback is suing the city for \$1 million</i> , https://www.cnn.com/2020/10/12/us/galvestonhorseback-arrest-lawsuit-trnd/index.html	N/A	N/A				
PX 116	Nov. 3, 2020 Email from D. Sullivan to M. Henry re: Election Night Reporting Results, attaching summary_Galveston	DEFS000 03900	DEFS000 03901				
PX 117	Part A 1 November 2020, Galveston County Election Results (spreadsheet)	DEFS000 02605	DEFS000 02605				

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No.	Description	Beg Bates	End Bates	Offer	Obj.	Date Admit	Date Deny
PX 118	Nov. 20, 2020 Galveston County Daily News Article by J. Wayne Ferguson, <i>Safety, not shenanigans, left church off island polling site list, officials say</i> , https://www.galvnews.com/news/free/article_eda562a9-a5b5-504f-bf7a-11c576fc93c9.html	N/A	N/A				
PX 119	Dec. 4, 2020 Article by C. Karpowitz et al., <i>What Leads Racially Resentful Voters to Choose Black Candidates?</i>	N/A	N/A				
PX 120	Dec. 12, 2020 Galveston County Daily News Article by J. LaCombe, <i>Marchers call for action after police shooting in La Marque</i> , https://www.galvnews.com/news/marchers-call-for-action-after-police-shooting-in-lamarque/article_7522734e-dbbb-5195-b2c6-54a2f0d6971e.html	N/A	N/A				
PX 121	Dec. 16, 2020 Calendar Invite from P. Ready to D. Oldham et al re Galveston County redistricting	DEFS000 18648	DEFS000 18648				
PX 122	Withdrawn by agreement of all parties.	-	-	-	-	-	
PX 123	Dec. 16, 2020 Calendar Invite from P. Ready to D. Oldham et al re Galveston County redistricting	DEFS000 29155	DEFS000 29156				
PX 124	Dec. 16, 2020 Email from D. Oldham to P. Rady re: Galveston County, Texas proposed engagement - 2020 census redistricting	DEFS000 30098	DEFS000 30100				
PX 125	Dec. 30, 2020 Email from L. Lietchy to M. Henry re: Letter from Tax Assessor-Collector re: Redistricting, attaching Dec. 22, 2020 Letter from C. Johnson to Hon. Mark Henry	DEFS000 03910	DEFS000 03911				

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No.	Description	Beg Bates	End Bates	Offer	Obj.	Date Admit	Date Deny
PX 126	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 127	Jan. 14, 2021 Email from C. Johnson to M. Henry et al. re: County Commissioner and JP/Constable Precinct Lists with Current Number Registered Voter, attaching Galveston County Precinct List with Number of Voters	DEFS000 04160	DEFS000 04162				
PX 128	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 129	Jan. 25, 2021 through Nov. 12, 2021 minutes, agendas, and video recordings of the Galveston County Commissioners Court	US00000 22	US00010 94				
PX 130	Feb. 1, 2021 Email from N. Sigler to M. Shannon re: block group counts, attaching African American - Black Count et al.	DEFS000 30080	DEFS000 30083				
PX 131	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 132	Feb. 1, 2021 Email from M. Shannon to S. Holmes re: FW: block group counts, attaching African American - Black Count et al.	DEFS000 30084	DEFS000 30087				
PX 133	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 134	Feb. 3, 2021 Annual Review of Political Science Article by L. Stephens-Dougan, <i>The Persistence of Racial Cues and Appeals in American Elections</i>	N/A	N/A				
PX 135	Feb. 22, 2021 Email from S. William to D. Sullivan re: FOIA Request For Election Results on November 3rd 2020 per Precinct and Shape File (attachment intentionally omitted)	DEFS000 19519	DEFS000 19520				

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No.	Description	Beg Bates	End Bates	Offer	Obj.	Date Admit	Date Deny
PX 136	Mar. 14, 2021 Galveston County Daily News Article by J. Wayne Ferguson, <i>Residents vow to stop housing development just outside of Santa Fe</i> , https://www.galvnews.com/news/residents-vow-to-stop-housing-development-just-outside-of-santa-fe/article_03d8dd25-e683-5a24-834b-de1426feb9a9.html	N/A	N/A				
PX 137	Mar. 30, 2021 Galveston County Daily News Article by E. Courville, <i>We will not allow our voting rights to be eroded</i> , https://www.galvnews.com/opinion/guest_columns/article_16e0386a-3a73-55eb-a2de-b9f07a3debba.html	N/A	N/A				
PX 138	Apr. 1, 2021 Email from P. Ready to D. Martinez re: Fwd: engagement letter, attaching Jan. 20, 2021 Letter from Holtzman Vogel Josefiak Torchinsky PLLC to P. Ready re: Holtzman Vogel Josefiak Torchinsky PLLC Engagement Letter	DEFS000 29190	DEFS000 29195				
PX 139	Apr. 5, 2021 Email from B. Chapman to D. Martinez re: Commissioners Court 4/5/21, attaching agenda items 11 and 13	DEFS000 28049	DEFS000 28064				
PX 140	Transcription of portion of Apr. 5, 2021 Galveston County Commissioners Court Meeting	N/A	N/A				
PX 141	Apr. 7, 2021 Email from Z. Davidson to T. Drummond re: FW: Oldham/redistricting retention letter	DEFS000 28183	DEFS000 28184				
PX 142	Withdrawn by agreement of all parties.	-	-	-	-	-	

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No.	Description	Beg Bates	End Bates	Offer	Obj.	Date Admit	Date Deny
PX 143	Apr. 8, 2021 Email from N. Sigler to C. Johnson et al. re: old commissioner precinct maps	DEFS000 04169	DEFS000 04171				
PX 144	Apr. 21, 2021 Email from P. Ready to D. Oldham re: Ps vs Commissioners redistricting question - Galveston County	DEFS000 18653	DEFS000 18654				
PX 145	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 146	Screenshot of Apr. 30, 2021 Website, Dr. Armstrong in the News Posted by Robin Armstrong	N/A	N/A				
PX 147	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 148	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 149	May 20, 2021 Email from R. Eldridge to C. Johnson re: Redistricting Information	DEFS000 04181	DEFS000 04183				
PX 150	May 20, 2021 Email From P. Ready to T. Drummond re: Asked and Answered!	DEFS000 33507	DEFS000 33509				
PX 151	Jun. 29, 2021 ABC13 Article by N. Natario, <i>Galveston County To Send COVID-19 Relief Money To fund the Border Wall and Security</i> , https://abc13.com/texas-border-wall-counties-using-money-from-covid-relief-helping-fundnews/10844833	N/A	N/A				
PX 152	Jul. 2, 2021 Email from N. Sigler to N. Baher re: DRAFT, attaching nancy wall DRAFT	DEFS000 20435	DEFS000 20436				
PX 153	Jul. 2, 2021 Email from N. Sigler to N. Stelly re: DRAFTS, attaching N COUNTY COMMISSIONER 24X36 et al.	DEFS000 20432	DEFS000 20434				

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No.	Description	Beg Bates	End Bates	Offer	Obj.	Date Admit	Date Deny
PX 154	Jul. 12, 2021 America Counts Article by America Counts Staff, <i>Upcoming Release of 2020 Census Redistricting Data Will Paint a Clearer Portrait of America</i>	N/A	N/A				
PX 155	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 156	Aug. 4, 2021 Email from B. Williams to M. Henry re: Redistricting	DEFS000 29474	DEFS000 29474				
PX 157	Aug. 4, 2021 Gallup Article by J. McCarthy and W. Dupree, <i>No Preferred Racial Term Among Most Black, Hispanic Adults</i>	N/A	N/A				
PX 158	Aug. 12, 2021 Galveston County Daily News Article by J. Wayne Ferguson, <i>Galveston County population tops 350K, according to census</i> , https://www.galvnews.com/news/article_15c68cc2-73f6-58b9-8162-07f7a74186e1.html	N/A	N/A				
PX 159	Aug. 13, 2021 Email from C. Johnson to K. Saludis et al re: Please, attaching Galveston County Commissioner Precinct Voters	DEFS000 16679	DEFS000 16680				
PX 160	Aug. 24, 2021 Email from C. Johnson to Commissioners re: Current Voter Count by Precinct, attaching Galveston County Voters by Precinct August 2021	DEFS000 03808	DEFS000 03809				
PX 161	Aug. 27, 2021 Email from S. Collins to D. Apffel re: Fw: Voter Registration, attaching 2020 Voter Registration et al.	DEFS000 11026	DEFS000 11028				
PX 162	Aug. 27, 2021 Email from K. Hart to C. Johnson et al. re: Gearing Up for Redistricting!	DEFS000 16695	DEFS000 16697				

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No.	Description	Beg Bates	End Bates	Offer	Obj.	Date Admit	Date Deny
PX 163	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 164	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 165	Aug. 31, 2021 Email from L. Liechty to D. Oldham re: Call Request - Galveston County Redistricting	DEFS000 29750	DEFS000 29751				
PX 166	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 167	Aug. 31, 2021 Email from P. Ready to L. Liechty re: Call Request - Galveston County Redistricting	DEFS000 29763	DEFS000 29767				
PX 168	Sept. 1, 2021 U.S. Department of Justice: Guidance under Section 2 of the Voting Rights Act, 52 U.S.C. 10301, for redistricting and methods of electing government bodies	N/A	N/A				
PX 169	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 170	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 171	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 172	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 173	Sept. 14, 2021 Email from A. Kincaid to D. Oldham re: Galveston report, attaching TX_GalvestonCountyCommission-DemoShifts-2021 et al.	DEFS000 30111	DEFS000 30115				
PX 174	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 175	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 176	Withdrawn by agreement of all parties.	-	-	-	-	-	-

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No.	Description	Beg Bates	End Bates	Offer	Obj.	Date Admit	Date Deny
PX 177	Sept. 20, 2021 Email from P. Ready to S. Holmes re: 2020 Census Data, attaching TX_GalvestonCountyCommission-DemoShifts-9-20-2021	DEFS000 30116	DEFS000 30117				
PX 178	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 179	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 180	Sept. 22, 2021 Email from S. Holmes to L. Liechty re: 2nd Call w/ Paul Ready & Dale Oldham	DEFS000 29833	DEFS000 29833				
PX 181	Sept. 23, 2021 Email from N. Sigler to <i>Redacted</i> re: List for Commissioner Holmes	DEFS000 04607	DEFS000 04607				
PX 182	Withdrawn by agreement of all parties.	-	-	-	-		
PX 183	Sept. 23, 2021 Email from D. Sullivan to C. Johnson re: Continuing our work	DEFS000 13502	DEFS000 13505				
PX 184	Sept. 23, 2021 Calendar Invite from L. Liechty for Conf. Call w/Holmes and Oldham re: Redistricting	DEFS000 29840	DEFS000 29840				
PX 185	Sept. 27, 2021 Email from N. Sigler to M. Shannon re: Commissioner Holmes project	DEFS000 04608	DEFS000 04609				
PX 186	Sept. 27, 2021 Email from N. Sigler to M. Shannon re Commissioner Holmes project	DEFS000 10412	DEFS000 10412				
PX 187	Oct. 14, 2021 through Oct. 26, 2021 Text Messages between T. Bryan and P. Gordon	DEFS000 31806	DEFS000 31807				
PX 188	Oct. 15, 2021 Email from T. Bryan to J. Torchinsky et al. re: Galveston	DEFS000 11236	DEFS000 11237				
PX 189	Oct. 15, 2021 Email from P. Gordon to J. Torchinsky et al. re: Galveston	DEFS000 30120	DEFS000 30120				

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No.	Description	Beg Bates	End Bates	Offer	Obj.	Date Admit	Date Deny
PX 190	Thomas Bryan, Spreadsheet "Pop Pivot" Tab, Containing Racial Data and Composition of Census Blocks (October 15, 2021)	DEFS000 31696	DEFS000 31696				
PX 191	Oct. 15, 2021 Email from P. Gordon to T. Bryan re: Galveston	DEFS000 36191	DEFS000 36193				
PX 192	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 193	Oct. 16, 2021 Email from T. Bryan to J. Torchinsky et al. re: Call on Galveston, 11AM EDT Sunday Oct 17	DEFS000 27855	DEFS000 27855				
PX 194	Oct. 16, 2021 Email from P. Gordon to T. Bryan re: Galveston	DEFS000 27875	DEFS000 27877				
PX 195	Oct. 16, 2021 Email from J. Torchinsky to T. Bryan et al. re: Galveston	DEFS000 27878	DEFS000 27880				
PX 196	Oct. 17, 2021 Email from T. Bryan to D. Oldham re: Galveston	DEFS000 11241	DEFS000 11244				
PX 197	Oct. 17, 2021 Email from T. Bryan to D. Oldham et al. re: Galveston, attaching Galveston_Analysis 10_17_21 et al.	DEFS000 36194	DEFS000 36200				
PX 198	Withdrawn by agreement of all parties.	-	-	-	-	-	
PX 199	Oct. 18, 2021 Calendar Invite from M. Henry re: HOLD Redistricting (per Tyler)	DEFS000 29477	DEFS000 29477				
PX 200	Oct. 19, 2021 Email from D. Apffel to B. Reyes re: Courthouse Security Committee	DEFS000 11032	DEFS000 11033				
PX 201	Oct. 19, 2021 Galveston Texas Optimal Geo Plan	DEFS000 36819	DEFS000 36820				
PX 202	Oct. 19, 2021 Calendar Invite from M. Henry re HOLD Redistricting (per Tyler)	DEFS000 16142	DEFS000 16142				
PX 203	Oct. 21, 2021 Email from T. Bryan to D. Oldham re: Zoom	DEFS000 11247	DEFS000 11247				

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No.	Description	Beg Bates	End Bates	Offer	Obj.	Date Admit	Date Deny
PX 204	Oct. 21, 2021 Email from T. Bryan to D. Oldham et al. re: Take 2	DEFS000 11248	DEFS000 11248				
PX 205	Oct. 21, 2021 Email from T. Bryan to D. Oldham re: New data and maps, attaching "Galveston_Analysis 10_22_21.xls"	DEFS000 11249	DEFS000 11252				
PX 206	Oct. 21, 2021 Galveston County Daily News Article by J. Wayne Ferguson, <i>2 years after lawsuit, Galveston County again trying to purge voter rolls</i> , https://www.galvnews.com/news/2-years-after-lawsuit-galveston-county-again-trying-to-purge-voter-rolls/article_66e3f779-11c0-5ad4-8d84-3392d4c6091a.html .	N/A	N/A				
PX 207	Oct. 22, 2021 Email from C. Johnson to T. Drummond re: Voters in County by Precinct, attaching Galveston County Voters by Precinct August 2021	DEFS000 04208	DEFS000 04209				
PX 208	Email from T. Bryan to D. Oldham re: Revised 10_22, attaching "Galveston_Analysis 10_22_21.xls"	DEFS000 11253	DEFS000 11254				
PX 209	Oct. 22, 2021 Email from T. Bryan to D. Oldham re: Please use this 10-22 file (attachment is PX 210)	DEFS000 36211	DEFS000 36211				
PX 210	Oct. 22, 2021 file sent from T. Bryan to D. Oldham titled "Galveston_Analysis 10_22_21.xls"	DEFS000 36212	DEFS000 36212				
PX 211	Oct. 22, 2021 Email from T. Bryan to P. Gordon re: Fw: Fwd: Current Voter Count by Precinct	DEFS000 36214- DEFS000 36215, DEFS000 32766					

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No.	Description	Beg Bates	End Bates	Offer	Obj.	Date Admit	Date Deny
PX 212	Oct. 25, 2021 Email from N. Sigler to M. Shannon re: Holmes project, attaching Commissioner Holmes Project et al.	DEFS000 10405	DEFS000 10412				
PX 213	Oct. 25, 2021 Email from T. Drummond to P. Ready re: PIA	DEFS000 29182	DEFS000 29204				
PX 214	Oct. 26, 2021 Email from N. Sigler to C. Johnson re: KUDOS	DEFS000 08053	DEFS000 08055				
PX 215	Oct. 26, 2021 Email from T. Bryan to D. Oldham et al. re: Current Voter Count by Precinct, attaching Galveston Map 1 10_21 et al.	DEFS000 11258	DEFS000 11263				
PX 216	Oct. 26, 2021 Email from T. Bryan to P. Gordon et al. re: Galveston Work Products, attaching map 1 Precinct Split Inventory et al.	DEFS000 11264	DEFS000 11288				
PX 217	Oct. 26, 2021 VTD Data Excel	DEFS000 11898					
PX 218	Oct. 26, 2021 Inventory of Galveston precinct splits for Map 1	DEFS000 27920	DEFS000 27929				
PX 219	Oct. 26, 2021 Inventory of Galveston precinct splits for Map 2	DEFS000 27905	DEFS000 27919				
PX 220	Oct. 26, 2021 Email from T. Bryan to P. Gordon re: Galveston Work Products	DEFS000 27959	DEFS000 27960				
PX 221	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 222	Oct. 26, 2021 Email from P. Gordon to T. Bryan re: Galveston Work Products	DEFS000 36223	DEFS000 36223				
PX 223	Oct. 26, 2021 Email from P. Gordon to T. Bryan re: Re: Galveston Work Products, attaching Galveston - Map 1 Precinct Inventory - 10_26_21	DEFS000 36224 DEFS000 32767	DEFS000 36226 DEFS000 32775				
PX 224	"10.28 Galveston Analysis" Spreadsheet sent from D. Oldham to N. Sigler	DEFS000 18660	DEFS000 18660				
PX 225	Galveston_Analysis 10_28_21.xlsx	DEFS000 28020	DEFS000 28020				

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No.	Description	Beg Bates	End Bates	Offer	Obj.	Date Admit	Date Deny
PX 226	"Galveston Analysis 10.28.21" Spreadsheet sent by K. Clark to K. Schafler	DEFS000 28148	DEFS000 28148				
PX 227	Oct. 28, 2021 Email from T. Bryan to P. Gordon et al. re: modified inventory, attaching Galveston Map 2 Precincts 10_28 et al.	DEFS000 36233, DEFS000 33514- DEFS000 33518					
PX 228	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 229	Oct. 29, 2021 Email from Z. Davidson to T. Drummond re: Public Comment Webpage, attaching Public Comment Page on Website	DEFS000 03891	DEFS000 03892				
PX 230	Oct. 29, 2021 Email from N. Sigler to M. Shannon re: redistricting maps	DEFS000 04614	DEFS000 04614				
PX 231	Oct. 29, 2021 VTD Data Excel (with Pop Pivot tab)	DEFS000 11286	DEFS000 11286				
PX 232	Oct. 29, 2021 Email from P. Ready to T. Drummond re: Fwd: modified inventory, attaching Galveston Map 2 Precincts 10_28 et al.	DEFS000 11887	DEFS000 11892				
PX 233	Excel VTD data from "Galveston_Analysis 10-28-21.xls"	DEFS000 11892	DEFS000 11892				
PX 234	Oct. 29, 2021 Email from P. Ready to T. Drummond re: Map 1 and Map 2 Boundary Files	DEFS000 11893	DEFS000 11893				
PX 235	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 236	Oct. 29, 2021 Galveston Texas Map 2 with Precincts	DEFS000 11896	DEFS000 11896				
PX 237	Withdrawn by agreement of all parties.	-	-	-			
PX 238	Oct. 29, 2021 Email from M. Henry to M. Henry re Screenshot 2021-10-29	DEFS000 16153	DEFS000 16156				

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No.	Description	Beg Bates	End Bates	Offer	Obj.	Date Admit	Date Deny
PX 239	Oct. 29, 2021 Letter to Hon. Mark Henry and Commissioners from The League of Woman Voters of the Bay Area	DEFS000 16269	DEFS000 16273				
PX 240	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 241	Oct. 29, 2021 Email from D. Oldham to T. Bryan re: Fwd: Missing files for map 1, attaching map 2 files et al.	DEFS000 28021	DEFS000 28023				
PX 242	Oct. 29, 2021 Email from N. Sigler to Z. Davidson re: FW: modified inventory, attaching Galveston Map 2 Precincts 10_28 et al.	DEFS000 28192	DEFS000 28197				
PX 243	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 244	Oct. 29, 2021 Email from T. Bryan to D. Oldham re: Fwd: Missing files for map 1	DEFS000 30132	DEFS000 30133				
PX 245	Oct. 29, 2021 Email from K. Otten to D. Apffel re: Discussion on some CLS Concerns	DEFS000 11040	DEFS000 11041				
PX 246	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 247	Joe Giusti Oct. 31, 2021 Facebook Posts	N/A	N/A				
PX 248	Nov. 1, 2021 Email from D. Apffel to B. Flanagan re: Redistricting	DEFS000 03811	DEFS000 03811				
PX 249	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 250	Nov. 2, 2021 Email from Elections Internet to Elections Internet re: MASS EMAIL ADVISORY (County Judges-326) Advisory 2021-14 - Impact of Redistricting on Certain Election Deadlines and Procedures	DEFS000 29374	DEFS000 11479				
PX 251	Withdrawn by agreement of all parties.	-	-	-	-	-	-

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No.	Description	Beg Bates	End Bates	Offer	Obj.	Date Admit	Date Deny
PX 252	Nov. 2, 2021 Email from T. Drummond to D. Oldham re: Fwd: MASS EMAIL ADVISORY (County Judges-326) Advisory 2021-14 - Impact of Redistricting on Certain Election Deadlines and Procedures	DEFS000 30284	DEFS000 30285				
PX 253	Nov. 2, 2021 Email from T. Drummond to D. Oldham re: Fwd: Galveston County Redistricting, attaching Oct. 29, 2021 Letter to Galveston County from League of Women Voters of the Bay Area and Texas Civil Rights Project	DEFS000 31229	DEFS000 31234				
PX 254	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 255	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 256	Nov. 3, 2021 Email Restricted to P. McLarty et al. re: Redistricting Scheduling	DEFS000 07866	DEFS000 07868				
PX 257	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 258	Nov. 3, 2021 Email from L. Liechty to D. Martinez et al. re: Redistributing	DEFS000 29849	DEFS000 29850				
PX 259	Nov. 4, 2021 Email from T. Drummond to J. Ferguson re: Redistricting Data	DEFS000 11903	DEFS000 11904				
PX 260	Nov. 4, 2021 Email from T. Drummond to S. Holmes re: Fwd: Galveston County Redistricting, attaching Oct. 29, 2021 Letter to Galveston County from League of Women Voters of the Bay Area and Texas Civil Rights Project	DEFS000 16268	DEFS000 16273				
PX 261	Withdrawn by agreement of all parties.	-	-	-	-	-	-

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No.	Description	Beg Bates	End Bates	Offer	Obj.	Date Admit	Date Deny
PX 262	Nov. 5, 2021 Email from D. Martinez to T. Drummond re: Special Meeting DRAFT, attaching TD DRAFT 11-9-21	DEFS000 11913	DEFS000 11915				
PX 263	Withdrawn by agreement of all parties.	-	-	-			
PX 264	Nov. 5, 2021 Email from M. Shannon to N. Sigler re: map 2, attaching M&B map 2 258 A et al.	DEFS000 20443	DEFS000 20452				
PX 265	Nov. 7, 2021 Email from L. Phillips to L. Arceneaux et al. re: Fw: Redistricting Maps	Holmes 001347	Holmes 001348				
PX 266	Nov. 9, 2021 Email from D. Martinez to T. Drummond re: FW: map 1, attaching Map 1 Commissioner Precincts 24x36	DEFS000 03916	DEFS000 03918				
PX 267	Nov. 9, 2021 Email from N. Sigler to D. Martinez re: map 1, attaching Map 1 Commissioner Precincts 24x36	DEFS000 04331	DEFS000 04332				
PX 268	Nov. 9, 2021 Email from N. Sigler to D. Martinez re: map 2, attaching Map 2 Commissioner Precincts 24x36	DEFS000 04333	DEFS000 04334				
PX 269	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 270	Nov. 9, 2021 Email from C. Johnson to K. Saludis re: Legislation Statuses & Redistricting	DEFS000 16726	DEFS000 16726				
PX 271	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 272	Withdrawn by agreement of all parties.	-	-	-	-	-	-

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No.	Description	Beg Bates	End Bates	Offer	Obj.	Date Admit	Date Deny
PX 273	Nov. 9, 2021 Galveston County Daily News Article by E. Collins, <i>Residents call for resignation of Texas City school board member</i> , https://www.galvnews.com/news/residents-call-for-resignation-of-texas-city-school-board-member/article_48c8c4a4-e26e-58e5-9ffd-78ea966f890f.html	N/A	N/A				
PX 274	Nov. 10, 2021 Email from D. Apffel to L. Clift et al. re: redistricting maps	DEFS000 03812	DEFS000 03812				
PX 275	Nov. 10, 2021 Email from L. Clift to M. Henry re: redistricting maps, attaching Nov. 10, 2021 Letter to Galveston County Judge M. Henry et al from L. Whaylen Clift	DEFS000 11042	DEFS000 11047				
PX 276	Nov. 10, 2021 Email from C. Johnson to K. Saludi re: Legislation Statuses & Redistricting	DEFS000 16731	DEFS000 16732				
PX 277	Nov. 10, 2021 Email from J. West to D. Martinez re: Commissioners Court Special Meeting Agenda - November 12th	DEFS000 18619	DEFS000 18621				
PX 278	Nov. 10, 2021 Email Invite from C. Dunn to S. Holmes re Commissioner Holmes/Galveston County	Holmes 000323	Holmes 000346				
PX 279	Nov. 10, 2021 NewsBank Inc. Article by J. Wayne Ferguson, <i>Political Buzz: Does the coast want a single - The Galveston County Daily News (TX)</i>	N/A	N/A				
PX 280	Anti-Defamation League Article, <i>The Oath Keepers: Anti-Government Extremists Recruiting Military and Police</i>	N/A	N/A				
PX 281	Nov. 12, 2021 Email from Galveston County Copier to B. Chapman re" Message from KM_C550i	DEFS000 11470	DEFS000 11473				

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No.	Description	Beg Bates	End Bates	Offer	Obj.	Date Admit	Date Deny
PX 282	Nov. 12, 2021 Email from A. Watson to B. Chapman re: Commissioner Holmes, attaching Commissioner Holmes Clerk Copy et al.	DEFS000 11474	DEFS000 11479				
PX 283	Withdrawn by agreement of all parties.	-	-	-	-	-	
PX 284	Nov. 12, 2021 Email from N. Sigler to C. Johnson re: map 1 and 2 breakdown, attaching Map 2 Commissioner Precinct by Current Voting Precincts & Splits et al.	DEFS000 20457	DEFS000 20461				
PX 285	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 286	Nov. 12, 2021 People Not Politics post	N/A	N/A				
PX 287	Nov. 15, 2021 Email from C. Johnson to P. McLarty re Update Again!	DEFS000 04232	DEFS000 04235				
PX 288	Nov. 15, 2021 Email from C. Johnson to N. Sigler re Precinct List with Lots of Info, attaching County Commissioner Possible Precinct Numbering for Redistricting	DEFS000 16754	DEFS000 16755				
PX 289	Nov. 16, 2021 Zoom meeting invite from N. Sigler to K. Clark et al. re: FW: Redistricting 2021	DEFS000 27757	DEFS000 27757				
PX 290	Nov. 17, 2021 Email from N. Sigler to D. Oldham et al. re: Revised Voting Precincts, attaching Voting Precincts 2021.zip	DEFS000 30304	DEFS000 30311				
PX 291	Nov. 30, 2021 Email from Restricted to P. Ready re: Fwd: Re: Galveston County redistricting numbers	DEFS000 28151	DEFS000 28152				
PX 292	Nov. 30, 2021 Email from P. Ready to K. Clark re: Galveston County redistricting numbers	DEFS000 36262	DEFS000 36263				

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No.	Description	Beg Bates	End Bates	Offer	Obj.	Date Admit	Date Deny
PX 293	Dec. 6, 2021 Email from Galveston County from J. Giusti as Chronicle writer reaching out for comment or statement	DEFS000 15163	DEFS000 15163				
PX 294	Dec. 7, 2021 Crystal Beach Local News Article, <i>Apffel introduces Joe Giusti as new Commissioner</i>	N/A	N/A				
PX 295	Dec. 10, 2021 Email from N. Sigler to H. Fortenberry re: Maproom Revisions, attaching Proposed Voting Precincts 11x17 et al.	DEFS000 11749	DEFS000 11753				
PX 296	Dec. 10, 2021 Email from D. Martinez to M. Henry re: DRAFT 12-14-21, attaching DRAFT 12-14-21 et al.	DEFS000 11921	DEFS000 11924				
PX 297	Dec. 10, 2021 Email from N. Sigler to T. Drummond re: Commissioner Precincts By Census Tracts, Block Groups and Blocks, attaching Commissioner Precincts By Census Tracts, Block Groups and Blocks	DEFS000 30323	DEFS000 30324				
PX 298	Dec. 14, 2021 Email from N. Sigler to D. Sullivan re: Online maps	DEFS000 04657	DEFS000 04657				
PX 299	Dec. 17, 2021 Email from T. Bryan to P. Gordon et al. re: Galveston Invoice, attaching Thomas Bryan Galveston Redistricting Invoice 12_17	DEFS000 31121	DEFS000 31123				
PX 300	Jan. 1, 2022 Platform and Resolutions as Amended and Adopted by the 2022 State Convention of the Republican Party of Texas	N/A	N/A				
PX 301	Jan. 19, 2021 Declaration of William S. Cooper in <i>Baltimore County Branch of the NAACP et al. v. Baltimore County, Maryland et al.</i> , Civ. No. LKG-21-3232 (N.D. Maryland)	N/A	N/A				

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No.	Description	Beg Bates	End Bates	Offer	Obj.	Date Admit	Date Deny
PX 302	Feb. 9, 2022 KPRC 2 News Article by R. Arnold, <i>Galveston County law enforcement continues sending resources to the border</i> , https://www.click2houston.com/news/investigates/2022/02/10/galveston-county-law-enforcement-continues-sending-resources-to-the-border/	N/A	N/A				
PX 303	Feb. 11, 2022 Email from N. Sigler to D. Sullivan re: Commissioner Precinct maps	DEFS000 05271	DEFS000 05271				
PX 304	Feb. 16, 2022 Email from N. Sigler to C. Elam re: GIS Shapelile request for voting precincts	DEFS000 20516	DEFS000 20516				
PX 305	Dr. Robin Armstrong, "Stand Up." https://www.youtube.com/watch?v=StikJDXxAKM	N/A	N/A				
PX 306	May 16, 2022 Email from R. Armstrong to L. Lietchy re: AG Certificates for completed training for Robin Armstrong, attaching Scanned Documents	DEFS000 29870	DEFS000 29872				
PX 307	May 17, 2022 Galveston County Press Release, <i>Dr. Robin Armstrong Appointed to Galveston County Commissioners Court</i>	DEFS000 11776	DEFS000 11776				
PX 308	May 17, 2022 Galveston County Daily News Article by J. Wayne Ferguson, <i>Physician appointed to fill precinct 4 commission seat in Galveston County</i> , https://www.galvnews.com/news/article_40f38906-c12b-5e99-ab14-c653aab11547.html	N/A	N/A				
PX 309	May 19, 2022 Email from L. Lietchy to ITShelp re: Set-up for Newly Appointed County Commissioner	DEFS000 17137	DEFS000 17138				

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No.	Description	Beg Bates	End Bates	Offer	Obj.	Date Admit	Date Deny
PX 310	Jul. 14, 2022 NBCnews.com Article by J. Lewis, <i>The Dangerous Evolution of Oath Keepers-and Leader Stewart Rhodes</i> , https://www.nbcnews.com/think/opinion/january-6-hearings-oath-keepers-testimony-revealed-dangerous-pivot-rcna38130	N/A	N/A				
PX 311	Jul. 27, 2022 Galveston County Daily News Article by K. Heath, <i>Armstrong elected as GOP pick for Precinct 4 commissioner</i> , https://www.galvnews.com/news/armstrong-elected-as-gop-pick-for-precinct-4-commissioner/article_d3a4a629-b5b8-514c-80b0-cd89f07c659e.html	N/A	N/A				
PX 312	Aug. 2, 2022 Email from N. Sigler to D. Sullivan re: November Master List, attaching Polling Locations 2022	DEFS000 05272	DEFS000 05274				
PX 313	Sept. 8, 2022 Texas News, KTRK Article by D. Lewis, <i>I don't want part of that: Galveston County commissioner explains why he once joined Oath Keepers</i> , https://abc13.com/galveston-county-commissioner-joe-giusti-once-member-of-oath-keepers-far-right-extremist-group/12213674/	N/A	N/A				
PX 314	Sept. 30, 2022 M. Henry Tweet, https://twitter.com/JudgeMarkHenry/status/1575916835811139584?cxt=HHwWgICloeeA5N4rAAAA	N/A	N/A				
PX 315	Nov. 1, 2021 Letter to D. Sullivan et al. from ACLU of Texas w/Attachments	N/A	N/A				
PX 316	Withdrawn by agreement of all parties.	-	-	-	-	-	-

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No.	Description	Beg Bates	End Bates	Offer	Obj.	Date Admit	Date Deny
PX 317	Nov. 21, 2022 Max Krochmal (United States) Expert Witness Report Appendix A - Curriculum Vita	N/A	N/A				
PX 318	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 319	Dec. 9, 2022 Capture of Nov. 18, 2021 Mother Jones Article by A. Berman, <i>This Texas County Shows Exactly How Republicans Are Rolling Back the Clock on Voting Rights</i> , https://www.motherjones.com/politics/2021/11/this-texas-county-shows-exactly-how-republicans-are-rolling-back-the-clock-on-voting-rights/	NAACP0000001	NAACP0000009				
PX 320	Dec. 9, 2022 Capture of Nov. 9, 2021 Galveston County Daily News Article by J. Wayne Ferguson, <i>County's proposed maps would break the voting power</i> , https://www.galvnews.com/news/countys-proposed-maps-would-break-up-minority-voting-power/article_c4a5cf0a-85fc-5ef6-a9bd-a7aa385a7574.html	NAACP0000018	NAACP0000023				
PX 321	Dec. 14, 2022 Def's First Supplemental and Amended Response to the United States' First Set of Interrogatories in <i>Petteway et al v. Galveston County et al.</i> , No. 22-cv-57 (S.D. Tex.)	N/A	N/A				
PX 322	Texas Election Code, Title 4. Time and Place of Elections, Chapter 43. Polling Places	N/A	N/A				

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No.	Description	Beg Bates	End Bates	Offer	Obj.	Date Admit	Date Deny
PX 323	Dec. 19, 2022 Petteway Plaintiffs' Responses to Defendants' First Interrogatories and Requests for Production in <i>Petteway et al v. Galveston County et al.</i> , No. 22-cv-57 (S.D. Tex.)	N/A	N/A				
PX 324	Dec. 19, 2022 Screenshot of Galveston County GIS Portal	N/A	N/A				
PX 325	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 326	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 327	Dec. 22, 2022 Deposition Transcript Upon Oral Examination of Mark E. Owens in <i>Soto Palmer et al. v. Hobbs et al.</i> , No. 22-cv-05035 (W.D. Wash.)	N/A	N/A				
PX 328	<i>American Historical Association: Statement on Standards of Professional Conduct</i> (updated January 2023)	N/A	N/A				
PX 329	Jan. 3, 2023 Crystal Beach Local News Article, <i>COC Annual Meeting & Elections</i>	N/A	N/A				
PX 330	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 331	Jan. 5, 2023 Previous Galveston Commissioner Precincts	N/A	N/A				
PX 332	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 333	Screenshot of Judge Mark Henry Facebook page	N/A	N/A				
PX 334	Screenshot of Judge Mark Henry Facebook page	N/A	N/A				
PX 335	Jan. 12, 2023 Rene R. Rocha (United States) Expert Witness Report & Declaration	N/A	N/A				

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No.	Description	Beg Bates	End Bates	Offer	Obj.	Date Admit	Date Deny
PX 336	Jan. 12, 2023 Rene R. Rocha (United States) Expert Witness Report Appendix A - Curriculum Vita	N/A	N/A				
PX 337	Jan. 13, 2023 Anthony E. Fairfax (United States) Expert Witness Report & Declaration	N/A	N/A				
PX 338	Jan. 13, 2023 Anthony E. Fairfax (United States) Expert Witness Report Appendix A - Resume	N/A	N/A				
PX 339	Jan. 13, 2023 A. Fairfax (United States) Expert Witness Report Appendix B - Maps of Illustrative and 2012-2021 Commissioners Court Plans	N/A	N/A				
PX 340	Jan. 13, 2023 A. Fairfax (United States) Expert Witness Report Appendix C (Redistricting Criteria Comparison Reports Standard Multitude Data - Illustrative 2012-2021 Commissioners Court Plans)	N/A	N/A				
PX 341	Jan. 13, 2023 W. Cooper (NAACP) Expert Witness Report Exhibit A (CV)	N/A	N/A				
PX 342	Jan. 13, 2023 W. Cooper (NAACP) Expert Witness Report Exhibit B (Methodology and Sources)	N/A	N/A				
PX 343	Jan. 13, 2023 W. Cooper (NAACP) Expert Witness Report Exhibit C (Selected Socio-Economic Data)	N/A	N/A				
PX 344	Jan. 13, 2023 W. Cooper (NAACP) Expert Witness Report Exhibit D (http://www.fairdata2000.com/ACS_2015_19/Galveston/)	N/A	N/A				
PX 345	Jan. 13, 2023 W. Cooper (NAACP) Expert Witness Report Exhibit E (Benchmark Plan)	N/A	N/A				

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PX 346	Jan. 13, 2023 W. Cooper (NAACP) Expert Witness Report Exhibit F (Enacted Plan)	N/A	N/A				
PX 347	Jan. 13, 2023 W. Cooper (NAACP) Expert Witness Report Exhibit G (2011 preclearance submission)	N/A	N/A				
PX 348	Jan. 13, 2023 W. Cooper (NAACP) Expert Witness Report Exhibit H (Proposal 1)	N/A	N/A				
PX 349	Jan. 13, 2023 W. Cooper (NAACP) Expert Witness Report Exhibit I (Illustrative Plan 1)	N/A	N/A				
PX 350	Jan. 13, 2023 W. Cooper (NAACP) Expert Witness Report Exhibit J (Illustrative Plan 2)	N/A	N/A				
PX 351	Jan. 13, 2023 W. Cooper (NAACP) Expert Witness Report Exhibit K (Illustrative Plan 3)	N/A	N/A				
PX 352	Jan. 13, 2023 W. Cooper (NAACP) Expert Witness Report Exhibit L (Defs' DOJ Interrogatory Response excerpt)	N/A	N/A				
PX 353	Jan. 13, 2023 W. Cooper (NAACP) Expert Witness Report Exhibit M (Illustrative Plan 1 shapefile)	N/A	N/A				
PX 354	Jan. 13, 2023 W. Cooper (NAACP) Expert Witness Report Exhibit N (Illustrative Plan 2 shapefile)	N/A	N/A				
PX 355	Jan. 13, 2023 W. Cooper (NAACP) Expert Witness Report Exhibit O (Illustrative Plan 3 shapefile)	N/A	N/A				
PX 356	Jan. 13, 2023 K. Oskooii (NAACP) Expert Witness Report & Declaration	N/A	N/A				
PX 357	Jan. 13, 2023 K. Oskooii (NAACP) Expert Witness Report Table 1: List of General Elections Analyzed	N/A	N/A				

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No.	Description	Beg Bates	End Bates	Offer	Obj.	Date Admit	Date Deny
PX 358	Jan. 13, 2023 K. Oskooii (NAACP) Expert Witness Report Table 2: List of Primary Elections Analyzed	N/A	N/A				
PX 359	Jan. 13, 2023 K. Oskooii (NAACP) Expert Witness Report Figure 1: Benchmark Map	N/A	N/A				
PX 360	Jan. 13, 2023 K. Oskooii (NAACP) Expert Witness Report Figure 2: Adopted Map	N/A	N/A				
PX 361	Jan. 13, 2023 K. Oskooii (NAACP) Expert Witness Report Figure 3: Plaintiff Map 1	N/A	N/A				
PX 362	Jan. 13, 2023 K. Oskooii (NAACP) Expert Witness Report Figure 4: Plaintiff Map 2	N/A	N/A				
PX 363	Jan. 13, 2023 K. Oskooii (NAACP) Expert Witness Report Figure 5: Plaintiff Map 3	N/A	N/A				
PX 364	Jan. 13, 2023 K. Oskooii (NAACP) Expert Witness Report Figure 6: Galveston County RxC Estimates for Candidates by Race	N/A	N/A				
PX 365	Jan. 13, 2023 K. Oskooii (NAACP) Expert Witness Report Figure 7: Galveston County Iterative EI Estimates for Candidates by Race	N/A	N/A				
PX 366	Jan. 13, 2023 K. Oskooii (NAACP) Expert Witness Report Figure 8: Galveston County Anglo, Black, Latino RxC Estimates	N/A	N/A				
PX 367	Jan. 13, 2023 K. Oskooii (NAACP) Expert Witness Report Figure 9: Galveston County Anglo, Black, Latino EI Estimates	N/A	N/A				
PX 368	Jan. 13, 2023 K. Oskooii (NAACP) Expert Witness Report Figure 10: Galveston County Turnout-Adjusted RPV Estimates	N/A	N/A				

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No.	Description	Beg Bates	End Bates	Offer	Obj.	Date Admit	Date Deny
PX 369	Jan. 13, 2023 K. Oskooii (NAACP) Expert Witness Report Figure 11: RxC Anglo Bloc Analysis by Precinct in Adopted Map	N/A	N/A				
PX 370	Jan. 13, 2023 K. Oskooii (NAACP) Expert Witness Report Exhibit A (CV)	N/A	N/A				
PX 371	Jan. 13, 2023 K. Oskooii (NAACP) Expert Witness Report Exhibit B (Benchmark, Adopted, and Cooper Maps)	N/A	N/A				
PX 372	Jan. 13, 2023 K. Oskooii (NAACP) Expert Witness Report Exhibit C (Figures 8-10)	N/A	N/A				
PX 373	Jan. 13, 2023 K. Oskooii (NAACP) Expert Witness Report Exhibit D (Texas Legislative Council data)	N/A	N/A				
PX 374	Jan. 13, 2023 K. Oskooii (NAACP) Expert Witness Report Exhibit E (VEST Texas Election data)	N/A	N/A				
PX 375	Jan. 13, 2023 K. Oskooii (NAACP) Expert Witness Report Exhibit F (Merged Demographic/General Election Data for Adopted Plan)	N/A	N/A				
PX 376	Jan. 13, 2023 K. Oskooii (NAACP) Expert Witness Report Exhibit G (Merged Demographic/General Election Data for Benchmark Plan)	N/A	N/A				
PX 377	Jan. 13, 2023 K. Oskooii (NAACP) Expert Witness Report Exhibit H (Merged Demographic/General Election Data for Demonstrative Map 1)	N/A	N/A				
PX 378	Jan. 13, 2023 K. Oskooii (NAACP) Expert Witness Report Exhibit I (Merged Demographic/General Election Data for Demonstrative Map 2)	N/A	N/A				

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No.	Description	Beg Bates	End Bates	Offer	Obj.	Date Admit	Date Deny
PX 379	Jan. 13, 2023 K. Oskooii (NAACP) Expert Witness Report Exhibit J (Merged Demographic/General Election Data for Demonstrative Map 3)	N/A	N/A				
PX 380	Jan. 13, 2023 K. Oskooii (NAACP) Expert Witness Report Exhibit K (Merged Demographic/Primary Election Data)	N/A	N/A				
PX 381	Jan. 13, 2023 L. Stephens-Dougan (NAACP) Expert Witness Report & Declaration	N/A	N/A				
PX 382	Jan. 13, 2023 L. Stephens-Dougan (NAACP) Expert Witness Report Figure 1: Percent Party Identification as Democrat, Among Whites Who Live in the South, 1964 – 2020 (weighted) [Created from ANES]	N/A	N/A				
PX 383	Jan. 13, 2023 L. Stephens-Dougan (NAACP) Expert Witness Report Exhibit A (CV)	N/A	N/A				
PX 384	Jan. 13, 2023 M. Barreto and M. Rios (Petteway) Expert Witness Report & Declaration (including all data, exhibits and appendices attached or contained within the report)	N/A	N/A				
PX 385	Jan. 13, 2023 T. Rush (Petteway) Expert Report (including all data, exhibits and appendices attached or contained within the report)	N/A	N/A				
PX 386	Jan. 13, 2023 W. Cooper (NAACP) Expert Witness Report & Declaration	N/A	N/A				
PX 387	Jan. 13, 2023 W. Cooper (NAACP) Expert Witness Report Figure 1: Galveston County 1990 Census to 2020 Census Population by Race and Ethnicity	N/A	N/A				

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No.	Description	Beg Bates	End Bates	Offer	Obj.	Date Admit	Date Deny
PX 388	Jan. 13, 2023 W. Cooper (NAACP) Expert Witness Report Figure 2: Galveston County – 2000-2020 Voting Age population & Estimated Citizen Voting Age Population by Race and Ethnicity	N/A	N/A				
PX 389	Jan. 13, 2023 W. Cooper (NAACP) Expert Witness Report Figure 3: Galveston County Municipalities and CDPs (2020 Census) Percentage Black + Latino	N/A	N/A				
PX 390	Jan. 13, 2023 W. Cooper (NAACP) Expert Witness Report Figure 4: Galveston County Municipalities and CDPs (2020 Census)	N/A	N/A				
PX 391	Jan. 13, 2023 W. Cooper (NAACP) Expert Witness Report Figure 5: Galveston County Areas Eligible for USDA Summer Meal Subsidies	N/A	N/A				
PX 392	Jan. 13, 2023 W. Cooper (NAACP) Expert Witness Report Figure 6: Benchmark Plan	N/A	N/A				
PX 393	Jan. 13, 2023 W. Cooper (NAACP) Expert Witness Report Figure 7: 2012 Benchmark Plan – 2020 Population Summary	N/A	N/A				
PX 394	Jan. 13, 2023 W. Cooper (NAACP) Expert Witness Report Figure 8: Enacted Plan	N/A	N/A				
PX 395	Jan. 13, 2023 W. Cooper(NAACP) Expert Witness Report Figure 9: Overlay of Enacted over Benchmark	N/A	N/A				
PX 396	Jan. 13, 2023 W. Cooper (NAACP) Expert Witness Report Figure 11: 2021 Enacted Plan – Population Summary	N/A	N/A				
PX 397	Jan. 13, 2023 W. Cooper (NAACP) Expert Witness Report Figure 12: 2021 Proposed Plan	N/A	N/A				

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No.	Description	Beg Bates	End Bates	Offer	Obj.	Date Admit	Date Deny
PX 398	Jan. 13, 2023 W. Cooper (NAACP) Expert Witness Report Figure 13: 2021 Proposed Plan 1 – Population Summary	N/A	N/A				
PX 399	Jan. 13, 2023 W. Cooper (NAACP) Expert Witness Report Figure 14: Illustrative Map 1	N/A	N/A				
PX 400	Jan. 13, 2023 W. Cooper (NAACP) Expert Witness Report Figure 15: Illustrative Map 1 – Population Summary	N/A	N/A				
PX 401	Jan. 13, 2023 W. Cooper (NAACP) Expert Witness Report Figure 16: Illustrative Map 2	N/A	N/A				
PX 402	Jan. 13, 2023 W. Cooper (NAACP) Expert Witness Report Figure 17: Illustrative Map 2 – Population Summary	N/A	N/A				
PX 403	Jan. 13, 2023 W. Cooper (NAACP) Expert Witness Report Figure 18: Illustrative Map 3	N/A	N/A				
PX 404	Jan. 13, 2023 W. Cooper (NAACP) Expert Witness Report Figure 19: Illustrative Map 3 – Population Summary	N/A	N/A				
PX 405	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 406	Office of the Harris County Attorney Christian D. Menefee - Join the discussion	N/A	N/A				
PX 407	Tex. Elec. Code § 172.023	N/A	N/A				
PX 408	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 409	Native Shapefiles for Demonstrative Map 1.						
PX 410	Native Shapefiles for Demonstrative Map 2						

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No.	Description	Beg Bates	End Bates	Offer	Obj.	Date Admit	Date Deny
PX 411	Native Shapefiles for Demonstrative Map 3						
PX 412	Jan. 27, 2023 M. Krochmal (United States) Expert Witness Report & Declaration	N/A	N/A				
PX 413	Jan. 27, 2023 M. Krochmal (United States) Expert Witness Report Appendix B - Table summarizing Several Facets of Redistricting Process used by County Commissioners Court	N/A	N/A				
PX 414	Jan. 27, 2023 T. Burch (Petteway/NAACP) Expert Witness Report & Declaration	N/A	N/A				
PX 415	Rush Alternative Map 1						
PX 416	Rush Alternative Map 2						
PX 417	Rush Alternative Map 3						
PX 418	Rush Alternative Map 4						
PX 419	Native Shapefile for Rush Alternative Map 3						
PX 420	Native Shapefile for Rush Alternative Map 4						
PX 421	Native Shapefiles for Alternative Map 1.						
PX 422	Native Shapefiles for Alternative Map 2						
PX 423	Reconstituted_VTDs (spreadsheet produced by U.S. on January 27, 2023)	Provided via email on January 27, 2023					
PX 424	Withdrawn by agreement of all parties.	-	-	-	-	-	-

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No.	Description	Beg Bates	End Bates	Offer	Obj.	Date Admit	Date Deny
PX 425	Feb. 15, 2023 Cheryl Johnson Campaign Website, http://vote4cheryl.com	N/A	N/A				
PX 426	Feb. 23, 2023 Email from D. Rose to V. Richardson of 8.4.21 email from Billy Williams to Mark Henry	PET0000 007	PET0000 008				
PX 427	Feb. 23, 2023 Email from D. Rose to V. Richardson of 4.10.21 email from Mary Patrick	PET0000 058	PET0000 060				
PX 428	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 429	Feb. 27, 2023 Petteway Plaintiffs' Amended Responses to Defendants' First Discovery Requests in <i>Petteway et al v. Galveston County et al.</i> , No. 22-cv-57 (S.D. Tex.)	N/A	N/A				
PX 430	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 431	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 432	Mar. 8, 2023 Letter from Rev. James E. Daniels; Founder and Chairman of The Eagle's Nest Community Organization. Co-Chairman of the Westend Ministers and Leaders Alliance	N/A	N/A				
PX 433	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 434	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 435	Mar. 17, 2023 J. R. Alford (Defendants) Expert Witness Report & Declaration	N/A	N/A				
PX 436	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 437	Withdrawn by agreement of all parties.	-	-	-	-	-	-

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No.	Description	Beg Bates	End Bates	Offer	Obj.	Date Admit	Date Deny
PX 438	William S. Cooper (NAACP) Expert Witness Rebuttal Report & Declaration (March 27, 2023)	N/A	N/A				
PX 439	Mar. 27, 2023 W. Cooper (NAACP) Expert Witness Rebuttal Report Exhibit A (5-Year 2017-2021 ACS Special Tabulation CVAP)	N/A	N/A				
PX 440	Mar. 27, 2023 W. Cooper (NAACP) Expert Witness Rebuttal Report Exhibit B (Communities of Interest)	N/A	N/A				
PX 441	Mar. 27, 2023 W. Cooper (NAACP) Expert Witness Rebuttal Report Exhibit C (Travel Contiguity)	N/A	N/A				
PX 442	Mar. 27, 2023 W. Cooper (NAACP) Expert Witness Rebuttal Report Exhibit D (Block Groups Split by VTDs That Are Specifically Referenced in Dr. Owens' Report)	N/A	N/A				
PX 443	Mar. 27, 2023 W. Cooper (NAACP) Expert Witness Rebuttal Report Exhibit E (Illustrative Plan 3A)	N/A	N/A				
PX 444	Mar. 27, 2023 W. Cooper (NAACP) Expert Witness Rebuttal Figure 1: Galveston County Divisions – 2020 Census	N/A	N/A				
PX 445	Mar. 27, 2023 W. Cooper (NAACP) Expert Witness Rebuttal Figure 2: Galveston County Regions	N/A	N/A				
PX 446	Mar. 27, 2023 W. Cooper (NAACP) Expert Witness Rebuttal Figure 3: Illustrative Map 3A	N/A	N/A				
PX 447	Mar. 27, 2023 W. Cooper (NAACP) Expert Witness Rebuttal Figure 4: Illustrative Map 3A – Population Summary	N/A	N/A				
PX 448	Withdrawn by agreement of all parties.	-	-	-	-	-	-

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No.	Description	Beg Bates	End Bates	Offer	Obj.	Date Admit	Date Deny
PX 449	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 450	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 451	Mar. 31, 2023 M. Owens (Defendants) Amended Expert Witness Report & Declaration	N/A	N/A				
PX 452	Apr. 4, 2023 K. Oskooii (NAACP) Expert Witness Rebuttal Report & Declaration	N/A	N/A				
PX 453	Apr. 7, 2023 A. Fairfax (United States) Expert Rebuttal Report Appendix A - Redistricting Criteria Comparison Reports Standard Multitude Data - Illustrative 2012-2021 Commissioners Court Plans	N/A	N/A				
PX 454	Apr. 7, 2023 A. Fairfax (United States) Expert Witness Rebuttal Report & Declaration	N/A	N/A				
PX 455	Apr. 7, 2023 J. Trounstine (United States) Expert Witness Rebuttal Report & Declaration	N/A	N/A				
PX 456	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 457	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 458	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 459	Book Excerpts, <i>Battle for the Heart of Texas Political Change in the Electorate</i> By M. Owens, K. Wink, and K. Bryant Jr.	N/A	N/A				
PX 460	Data Files	N/A	N/A				
PX 461	Book, <i>Game of Politics: Conflict, Power, and Representation</i> , by K. Bryant Jr., E. Lopez, and M. Owens	N/A	N/A				
PX 462	Screenshot of M. Owens, Political Science Profile	N/A	N/A				

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No.	Description	Beg Bates	End Bates	Offer	Obj.	Date Admit	Date Deny
PX 463	Screenshot of M. Owens, Associate Professor of Political Science Profile	N/A	N/A				
PX 464	Galveston County Population map	N/A	N/A				
PX 465	Apr. 14, 2023 Matt A. Barreto and Rios (Petteway) Expert Rebuttal (including all data, exhibits and appendices attached or contained within the report)	N/A	N/A				
PX 466	Withdrawn by agreement of all parties.	-	-	-	-	-	
PX 467	Withdrawn by agreement of all parties.	-	-	-	-	-	
PX 468	Apr. 14, 2023 Tye Rush (Petteway) Rebuttal Expert Report (including all data, exhibits and appendices attached or contained within the report)	N/A	N/A				
PX 469	Native Shapefile for Rush Demonstrative Map 2b.						
PX 470	Withdrawn by agreement of all parties.	-	-	-	-	-	
PX 471	Withdrawn by agreement of all parties.	-	-	-	-	-	
PX 472	Demographic Data from Dave's Redistricting	N/A	N/A				
PX 473	Withdrawn by agreement of all parties.	-	-	-	-	-	
PX 474	Withdrawn by agreement of all parties.	-	-	-	-	-	
PX 475	Index of/ACS_2015_19/Galveston (2015-2019 ACS)	N/A	N/A				
PX 476	Apr. 21, 2023 Jessica Trounstine (United States) Expert Witness Second Corrected Expert Report	N/A	N/A				
PX 477	Apr. 21, 2023 Jessica Trounstine (United States) Second Corrected Expert Witness Report Appendix A - Curriculum Vita	N/A	N/A				
PX 478	Apr. 21, 2023 Jessica Trounstine (United States) Second Corrected Expert Witness Report Appendix B - Methodological Appendix	N/A	N/A				

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No.	Description	Beg Bates	End Bates	Offer	Obj.	Date Admit	Date Deny
PX 479	Apr. 21, 2023 Jessica Trounstine (United States) Second Corrected Expert Witness Report Appendix C - Estimates of Racial/Ethnic Group Support for Candidates	N/A	N/A				
PX 480	Apr. 21, 2023 Jessica Trounstine (United States) Second Corrected Expert Witness Report Appendix D - Professor John Logan Data Appendix	N/A	N/A				
PX 481	Withdrawn by agreement of all parties.	-	-	-	-	-	
PX 482	Withdrawn by agreement of all parties.	-	-	-	-	-	
PX 483	Withdrawn by agreement of all parties.	-	-	-	-	-	
PX 484	Withdrawn by agreement of all parties.	-	-	-	-	-	
PX 485	May 15, 2023 Expert Declaration of Tye Rush	N/A	N/A				
PX 486	May 15, 2023 Tye Rush (Petteway) Corrected Expert Witness Rebuttal Report & Declaration (including all data, exhibits and appendices attached or contained within the report)	N/A	N/A				
PX 487	May 15, 2023 Tye Rush (Petteway) Corrected Expert Witness Report & Declaration (including all data, exhibits and appendices attached or contained within the report)	N/A	N/A				
PX 488	May 15, 2023 Rush Corrected Rebuttal Report Appendix B: Rush Demonstrative 2b	N/A	N/A				
PX 489	May 15, 2023 Rush Corrected Report Figure 1: Rush Demonstrative Map 1	N/A	N/A				
PX 490	May 15, 2023 Rush Corrected Report Figure 2: Rush Demonstrative Map 2	N/A	N/A				

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No.	Description	Beg Bates	End Bates	Offer	Obj.	Date Admit	Date Deny
PX 491	May 15, 2023 Rush Corrected Report Figure 3: Rush Demonstrative Map 3	N/A	N/A				
PX 492	May 31, 2023 Jonathan D. Brooks Declaration Appendix B, Galveston County, Texas Commissioners Court Map (Adopted November 12, 2021) w/Adopted Galveston County, Texas Commissioners Court Plan - All Precincts Population Report	N/A	N/A				
PX 493	May 31, 2023 Jonathan D. Brooks Declaration Appendix A, Galveston County, Texas Commissioners Court Map (2012-2021) w/Previous Galveston County, Texas Commissioners Court Plan - All Precincts Population Report	N/A	N/A				
PX 494	May 31, 2023 Declaration of Jonathan D. Brooks (DOJ geographer created 2021 plan shapefiles and demographic data)	N/A	N/A				
PX 495	May 31, 2023 Declaration of Lucille McGaskey	N/A	N/A				
PX 496	May 31, 2023 Zoom Video recording of Drs. Barreto, Alford and Stevenson and Mr. Rios	N/A	N/A				
PX 497	Jun. 1, 2023 Maptitude Screenshot - Galveston Alt 4 Map Census Data	Holmes 001288	Holmes 001299				
PX 498	Jun. 1, 2023 Declaration of Joe Compian	N/A	N/A				
PX 499	Jun. 1, 2023 Declaration of Robert Quintero	N/A	N/A				
PX 500	Jun. 1, 2023 Declaration of Sharon B. Lewis	N/A	N/A				
PX 501	Jun. 1, 2023 Declaration of Jessica Trounstine (United States) Expert Witness	N/A	N/A				
PX 502	Withdrawn by agreement of all parties.	-	-	-	-	-	
PX 503	Jun. 2, 2023 Declaration of Tye Rush (Petteway) Expert Witness	N/A	N/A				

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No.	Description	Beg Bates	End Bates	Offer	Obj.	Date Admit	Date Deny
PX 504	Jun. 2, 2023 Office of the Harris County Attorney, Harris County, Texas, Redistricting Schedule (https://cao.harriscountytexas.gov/Commissioner-Precinct-Redistricting/Join-the-Discussion)	N/A	N/A				
PX 505	Jun. 14, 2023 Supplemental Report of Dr. Kassra A.R. Oskooii	N/A	N/A				
PX 506	Withdrawn by agreement of all parties.	-	-	-			
PX 507	Jun. 14, 2023 Oskooii Figure 1: 2022 General Election Iterative Ecological Inference Estimates for Galveston County using BISG (Anglo vs. Non-Anglo Voters)	N/A	N/A				
PX 508	Jun. 14, 2023 Oskooii Figure 2: 2022 General Election RxC Ecological Inference Estimates for Galveston County using BISG (Anglo vs. Non-Anglo Voters)	N/A	N/A				
PX 509	Jun. 14, 2023 Oskooii Figure 3: 2022 General Election Iterative Ecological Inference Estimates for Galveston County using BISG (Anglo, Black, and Latino Voters)	N/A	N/A				
PX 510	Jun. 14, 2023 Oskooii Figure 4: 2022 General Election RxC Ecological Inference Estimates for Galveston County using BISG (Anglo, Black, and Latino Voters)	N/A	N/A				
PX 511	Jun. 14, 2023 Oskooii Figure 5: 2020 General Election Iterative Ecological Inference Estimates for Galveston County using BISG (Anglo vs. Non-Anglo Voters)	N/A	N/A				

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No.	Description	Beg Bates	End Bates	Offer	Obj.	Date Admit	Date Deny
PX 512	Jun. 14, 2023 Oskooii Figure 6: 2020 General Election RxC Ecological Inference Estimates for Galveston County using BISG (Anglo vs. Non-Anglo Voters)	N/A	N/A				
PX 513	Jun. 14, 2023 Oskooii Figure 7: 2020 General Election Iterative Ecological Inference Estimates for Galveston County using BISG (Anglo, Black, and Latino Voters)	N/A	N/A				
PX 514	Jun. 14, 2023 Oskooii Figure 8: 2020 General Election Iterative Ecological Inference Estimates for Galveston County using BISG (Anglo, Black, and Latino Voters)	N/A	N/A				
PX 515	Jun. 19, 2023 Map & Population Summary	N/A	N/A				
PX 516	Jun. 19, 2023 Map & Population Summary	N/A	N/A				
PX 517	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 518	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 519	"Dr. Armstrong Where were they Run Off 2018 Campaign Video for Ken Clark https://www.youtube.com/watch?v=GhJYTGupTzg&t=3s"	N/A	N/A				
PX 520	Dec. 3, 2021 Email from K. Saludis to A. Paluch re RE: Registered Voter File Request, attaching Preliminary Listing of Precinct Changes Galveston County Texas 12.1.2021	DEFS000 10347	DEFS000 10350				
PX 521	Spreadsheet with total population and VAP broken down by race for Galveston County Commission districts	DEFS000 30117	DEFS000 30117				

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No.	Description	Beg Bates	End Bates	Offer	Obj.	Date Admit	Date Deny
PX 522	Map 1 - Galveston Precincts Listed by Districts	DEFS000 32890	DEFS000 32901				
PX 523	Map 2- Galveston Precincts Listed by Districts	DEFS000 32902	DEFS000 32924				
PX 524	Galveston Texas Draft Optimal D Plan	DEFS000 36199	DEFS000 36199				
PX 525	Oct. 17, 2021 Spreadsheet	DEFS000 36197	DEFS000 36197				
PX 526	Galveston Texas Draft Minimum Change Plan	DEFS000 36811	DEFS000 36812				
PX 527	Oct. 22, 2021 Email from T. Bryan to D. Oldham re Updated Spreadsheet (See PX 528 for Attachment)	DEFS000 31181	DEFS000 31181				
PX 528	Spreadsheet with blocks data including racial and political breakdowns for Map 1 and Map 2	DEFS000 31182	DEFS000 31182				
PX 529	Galveston Texas Map with Precincts	DEFS000 35515	DEFS000 35515				
PX 530	Sep. 7, 2011 Email from B. Chapman to M. Fitzgerald, N. Sigler re FW: Redistricting Resolutions w/ attachments	DEFS000 36236, DEFS000 32946	DEFS000 36237, DEFS000 32951				
PX 531	Minutes of 8/15/2011 redistricting public hearing	DEFS000 32964	DEFS000 32965				
PX 532	Minutes of 8/16/2011 redistricting public hearing	DEFS000 32966	DEFS000 32967				
PX 533	Minutes of 8/17/2011 redistricting public hearing	DEFS000 32968	DEFS000 32970				
PX 534	Minutes of 8/22/2011 redistricting public hearing	DEFS000 32971	DEFS000 32973				
PX 535	Minutes of 8/23/2011 redistricting public hearing	DEFS000 32974	DEFS000 32976				
PX 536	Oct. 3, 2011 Email from P. Grady to J. Nixon re Information for Preclearance in Voting Procedures (See PX 537 for Attachments)	DEFS000 36304	DEFS000 36305				
PX 537	Attachment to Patricia Grady email (PX 536), Guidelines for Redistricting Submission (PX 536)	DEFS000 34401	DEFS000 34401				

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No.	Description	Beg Bates	End Bates	Offer	Obj.	Date Admit	Date Deny
PX 538	Oct. 19, 2021 Email from T. Bryan to D. Oldham re Galveston Deliverables w/ attachments	DEFS000 36201	DEFS000 36204				
PX 539	Scan of adopted 2001 redistricting criteria	DEFS000 36822	DEFS000 36824				
PX 540	Scan of portion of 2001 preclearance submission	DEFS000 36957	DEFS000 36961				
PX 541	Attachments to Email from T. Trainor to M. Henry (Aug. 29, 2021) (PX 45)	DEFS000 31599	DEFS000 31606				
PX 542	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 543	Withdrawn by agreement of all parties.	-	-	-	-	-	-
PX 544	Apr. 21, 2023 Table 1 in Jessica Trounstine (United States) Expert Witness Second Corrected Expert Report	N/A	N/A				
PX 545	Apr. 21, 2023 Table 2 in Jessica Trounstine (United States) Expert Witness Second Corrected Expert Report	N/A	N/A				
PX 546	Apr. 21, 2023 Chart 1 in Jessica Trounstine (United States) Expert Witness Second Corrected Expert Report	N/A	N/A				
PX 547	Jan. 13, 2023 Table 2 in Anthony Fairfax (United States) Expert Witness Report	N/A	N/A				
PX 548	Jan. 13, 2023 Table 3 in Anthony Fairfax (United States) Expert Witness Report	N/A	N/A				
PX 549	Jan. 13, 2023 Table 4 in Anthony Fairfax (United States) Expert Witness Report	N/A	N/A				
PX 550	Jan. 13, 2023 Table 5 in Anthony Fairfax (United States) Expert Witness Report	N/A	N/A				
PX 551	Jan. 13, 2023 Table 6 in Anthony Fairfax (United States) Expert Witness Report	N/A	N/A				

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No.	Description	Beg Bates	End Bates	Offer	Obj.	Date Admit	Date Deny
PX 552	Jan. 13, 2023 Table 7 in Anthony Fairfax (United States) Expert Witness Report	N/A	N/A				
PX 553	Jan. 13, 2023 Figure 1 in Anthony Fairfax (United States) Expert Witness Report	N/A	N/A				
PX 554	Jan. 13, 2023 Figure 2 in Anthony Fairfax (United States) Expert Witness Report	N/A	N/A				
PX 555	Jan. 13, 2023 Figure 3 in Anthony Fairfax (United States) Expert Witness Report	N/A	N/A				
PX 556	Jan. 13, 2023 2012-2021 Plan at page 47 in Appendix B of Anthony Fairfax (United States) Expert Witness Report	N/A	N/A				
PX 557	Apr. 7, 2023 Tables 1-3 in Anthony Fairfax (United States) Expert Witness Rebuttal Report	N/A	N/A				
PX 558	Jun. 1, 2023 Table in Declaration of Jessica Trounstine	N/A	N/A				
PX 559	Jan. 12, 2023 Tables 1-6 in Rene R. Rocha (United States) Expert Witness Report & Declaration	N/A	N/A				
PX 560	Jan. 12, 2023 Figure 1 in Rene R. Rocha (United States) Expert Witness Report & Declaration	N/A	N/A				
PX 561	Jan. 12, 2023 Figure 2 in Rene R. Rocha (United States) Expert Witness Report & Declaration	N/A	N/A				
PX 562	Jan. 12, 2023 Figure 3 in Rene R. Rocha (United States) Expert Witness Report & Declaration	N/A	N/A				
PX 563	Aug. 19, 1992 Consent Judgment and Election Order in <i>Leroy Hoskins et al. vs. John Hannah et al.</i> , Civil Action No. G-92-12 (S.D. Texas 1992)	N/A	N/A				
PX 564	Jul. 20, 2007 Consent Decree Judgment and Order in <i>United States of America v. Galveston County</i> , Civil Action No. 3:07-cv-377 (S.D. Texas 2007)	N/A	N/A				

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No.	Description	Beg Bates	End Bates	Offer	Obj.	Date Admit	Date Deny
PX 565	Aug. 17, 2011 Galveston County Daily News Article by T.J. Aulds, <i>Judges oppose proposed redistricting plans</i> , https://www.galvnews.com/news/article_b05baf6b-2c49-57a2-99a6-4a79925e5adc.html	N/A	N/A				
PX 566	Mar. 30, 2016 Galveston County Daily News Article by C. Koop, <i>Commissioners Court removes Galveston polling location, adds League City for runoff early voting</i> , https://www.galvnews.com/election/article_ae2dfe39-aa29-5d34-9269-5d264a18a2da.html	N/A	N/A				
PX 567	Aug. 8, 2016 Galveston County Daily News Article by C. Koop, <i>County officials approve part of plan to advertise election information</i> , https://www.galvnews.com/news/article_8c7a1879-3d45-5123-949b-7d889979a6ed.html	N/A	N/A				
PX 568	Feb. 12, 2021 U.S. Census Bureau Statement on Redistricting Data Timeline, https://www.census.gov/newsroom/press-releases/2021/statement-redistricting-data-timeline.html	N/A	N/A				
PX 569	Mar. 15, 2021 U.S. Census Bureau Statement on Release of Legacy Format Summary Redistricting Data File - Press Release	N/A	N/A				
PX 570	Apr. 5, 2021 Commissioners Court Meeting Agenda Backup	N/A	N/A				

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No.	Description	Beg Bates	End Bates	Offer	Obj.	Date Admit	Date Deny
PX 571	Apr. 7, 2011, Galveston County Daily News Article by J. Wayne Ferguson, <i>Galveston County turns to GOP consultant for redistricting help</i> , https://www.galvnews.com/news/galveston-county-turns-to-gop-consultant-for-redistricting-help/article_12b6173b-4be4-5192-adb1-9fab5d03622.html	N/A	N/A				
PX 572	2020 Census Timeline of Important Milestones, https://www.census.gov/programs-surveys/decennial-census/decade/2020/planning-management/release/timeline.html	N/A	N/A				
PX 573	Opening Meetings Act Handbook 2022 (used on Jan. 17, 2023)	N/A	N/A				
PX 574	Census Population Data by 2020 Galveston County VTD	N/A	N/A				
PX 575	Summary Exhibit of Enacted and Proposed Maps	N/A	N/A				
PX 576	Oct. 14, 2011 Email from B. Chapman to P. Grady re minutes for August 30th, attaching minutes from August 30, 2011 public hearing	DEFS00032977	DEFS00032991				
PX 577	Mar. 5, 2012 Letter from United States Attorney General to Galveston County interposing a Section 5 objection to the 2011 commissioners court redistricting plan	US0000017	US0000021				
PX 578	Mar. 22, 2012, Galveston County Daily News Article by T.J. Aulds, <i>Another redistricting map set for DOJ</i>	N/A	N/A				

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No.	Description	Beg Bates	End Bates	Offer	Obj.	Date Admit	Date Deny
PX 579	Mar. 22, 2012 Letter from Galveston County re Submission under Section 5 of the Voting Rights Act of 2012 redistricting plan for the Galveston County Commissioners Court and request for expedited consideration	N/A	N/A				
PX 580	Mar. 23, 2012, Galveston County Daily News Article by T.J. Aulds, <i>Commissioners approve new redistricting map</i>	N/A	N/A				
PX 581	Feb. 5, 2013 Commissioners Court Meeting Agenda	N/A	N/A				
PX 582	Aug. 19, 2013 Commissioners Court Meeting Agenda and Minutes	N/A	N/A				
PX 583	Jan. 25, 2021 Commissioners Court Meeting Agenda	DEFS000 27727	DEFS000 27735				
PX 584	Jan. 25, 2021 Commissioners Court Meeting Minutes	N/A	N/A				
PX 585	Apr. 5, 2021 Commissioners Court Meeting Agenda and Minutes	N/A	N/A				
PX 586	Aug. 13, 2021 Email from T. Drummond to T. Drummond re Census Data	DEFS000 11885	DEFS000 11885				
PX 587	Oct. 29, 2021 Email from S. Swanson to M. Henry re Galveston County Redistricting, attaching Oct. 29, 2021 Letter to Galveston County Judge M. Henry and Commissioners from The League of Women Voters of the Bay Area	DEFS000 11034	DEFS000 11039				
PX 588	Oct. 29, 2021 Facebook Post by M. Henry	DEFS000 31054	DEFS000 31054				
PX 589	Nov. 9, 2021 Email from L. Liechty re Commissioners Court Special Meeting Agenda - November 12th, attaching Special Meeting Agenda Nov 12 2021	DEFS000 29855	DEFS000 29858				

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No.	Description	Beg Bates	End Bates	Offer	Obj.	Date Admit	Date Deny
PX 590	Nov. 10, 2021 Email from D. Martinez to J. West re Commissioners Court Special Meeting Agenda - November 12th, attaching Special Meeting Agenda Nov 12 2021	DEFS000 18615	DEFS000 18618				
PX 591	Nov. 12, 2021 Special Session Hearing Transcript	N/A	N/A				
PX 592	May 17, 2022 Official Order Appointing Dr. R. Armstrong - M. Henry	DEFS000 28075	DEFS000 28075				
PX 593	Apr. 21, 2023 Defs' Second Supp. and Amended Responses to the United States' First Set of Interrogatories in <i>Petteway et al v. Galveston County et al.</i> , No. 22-cv-57 (S.D. Tex.)	N/A	N/A				
PX 594	Apr. 21, 2023 Defs' Second Supp. and Amended Responses to Petteway Plaintiffs' Requests for Production and Interrogatories in <i>Petteway et al v. Galveston County et al.</i> , No. 22-cv-57 (S.D. Tex.)	N/A	N/A				
PX 595	Jun. 12, 2023 Defs' 1st Supp. Responses to the United States' First Set of Requests for Admissions in <i>Petteway et al v. Galveston County et al.</i> , No. 22-cv-57 (S.D. Tex.)	N/A	N/A				

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

DICKINSON BAY AREA BRANCH §
NAACP, et al., §
§
Plaintiffs, §
§
v. § Civil Action No. 3:22-cv-117- JVB
§
GALVESTON COUNTY, TEXAS, et al., §
§
Defendants. §

TERRY PETTEWAY, et al., §
§
Plaintiffs, §
§
v. § Civil Action No. 3:22-cv-57-JVB
§ [Lead Consolidated Case]
§
GALVESTON COUNTY, TEXAS, et al., §
§
Defendants. §

UNITED STATES OF AMERICA, §
§
Plaintiff, §
§
v. § Civil Action No. 3:22-cv-93-JVB
§
GALVESTON COUNTY, TEXAS, et al., §
§
Defendants. §

CONSOLIDATED PLAINTIFFS' OBJECTIONS TO DEFENDANTS' EXHIBITS

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No.	Description	Offer	Obj.	Date Admit	Date Deny
DX-001	2006-4-10 GDN Article "Committee finds no patterns of discrimination" - DEFS00040002-03		FRE 802 (Hearsay)		
DX-002	2007-7-3 GDN Article "Meeting to mull police brutality claims" - DEFS00040066-68		FRE 802 (Hearsay)		
DX-003	2010-9-14 Article: Hurricane Ike Awakened Region to Dire Flooding Threats - DEFS00040057-61		FRE 802 (Hearsay)		
DX-004	2011-1-1 2011 Commissioners Precinct Map - DEFS00036815				
DX-005	2011-1-1 Old Commissioner Map Hi Res - DEFS00020431				
DX-006	2011-10-14 Trainor Commissioner Preclearance letter to DOJ - DEFS00031633-31644		FRE 106 (Completeness)		
DX-007	2011-4-6 Galveston County Beach Erosion Task Force Meeting Packet - DEFS00040010-50		FRE 401 (Relevance)		
DX-008	2011-4-25 Gordon email to DOJ re: Galveston Election Data with XLS attachment - US0001320-21				
DX-009	2011-5-7 Approval of CC Resolution - US0002168				
DX-010	2011-6-27 Compian email regarding boxer Jack Johnson statue - NAACP00001077-79				
DX-011	2011-7-30 GCD Email re: "put the fear of the voter in these republicans" - NAACP00001467-68		FRE 401 (Relevance), 403 (Prejudice, Confusion, Waste of Time)		
DX-012	Withdrawn (JX 2)				
DX-013	Withdrawn (JX 3)				

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No.	Description	Offer	Obj.	Date Admit	Date Deny
DX-014	Galveston County's Submission under Section 5, Voting Rights Act of the 2011 redistricting of commissioner precincts for Galveston County, Texas and Request for Expedited Consideration (October 14, 2011) (DEFS00031618-29)		FRE 106 (Completeness)		
DX-015	2011-12-1 2011 US Phone memos - US0002276-2309		FRE 802 (Hearsay); FRE 401 (Relevance)		
DX-016	2011-12-12 Holmes email with DOJ - US0002008-36		FRE 802 (Hearsay)		
DX-017	2012-1-10 "current voter list" - DEFS00031099				
DX-018	Withdrawn (JX 6)				
DX-019	2012-3-11 GCD and Criss Email tre Commissioners Court "REPUBS" - NAACP00001467-1468		FRE 401 (Relevance); 403 (Prejudice, Confusion, Waste of Time); FRE 802 (Hearsay)		
DX-020	2012-3-12 2012 DRAFT Letter to the Court re: Commissioner Compromise map - NAACP00001277		FRE 401 (Relevance); 403 (Prejudice, Confusion, Waste of Time)		
DX-021	2012-3-12 GCD email (Let's put the fear of the voters into Republicans!) - NAACP00001457-1458		FRE 401 (Relevance); 403 (Prejudice, Confusion, Waste of Time)		
DX-022	2012-3-12 Gulf Coast Interfaith Letter to Commissioners (signed) - US0001722-26		FRE 802 (Hearsay)		
DX-023	2012-3-22 Article - Another redistricting map set for DOJ				
DX-024	Withdrawn (JX 8)				

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No.	Description	Offer	Obj.	Date Admit	Date Deny
DX-025	2012-3-23 Article - Commissioners approve new redistricting map				
DX-026	2012-3-23 Compian Email to DOJ - US0001163		FRE 802 (Hearsay)		
DX-027	2012-5-10 Public Service Announcement on Public Housing - NAACP00001073-75				
DX-028	2014-2-10 Article "What a way to begin Black History Month" - DEFS0040122-23		FRE 802 (Hearsay)		
DX-029	2018-1-1 Republican primary voters 2018 - DEFS00030209				
DX-030	2019-4-19 AP Article - Some women of color frustrated by... quoting Roxy Williamson - DEFS0040096-98		FRE 802 (Hearsay), FRE 401 (Relevance), 403 (Prejudice, Confusion, Waste of Time)		
DX-031	2019-8-6 Article "New video released of controversial rope-led arrest in Galveston" - DEFS00040069-71		FRE 802 (Hearsay)		
DX-032	2019-10-25 Email re: election day locations with maps attached - DEFS00008042				
DX-033	2019-12-8 Texas Tribune Article: Top Texas Republicans pressure county chair to resign over racist text - DEFS00040127-31		FRE 802 (Hearsay)		
DX-034	2020-1-1 Galveston County General Election Cumulative Results Report - DEFS00031067-73				
DX-035	2020-1-1 Republican primary voters 2020 - DEFS00030211				
DX-036	2020-2-21 Johnson tweet re ad - DEFS00031247				

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No.	Description	Offer	Obj.	Date Admit	Date Deny
DX-037	2020-2-23 Johnson tweet re ad - DEFS00031248				
DX-038	2020-3-27 First Amended Complaint For Injunctive Relief - Doc. No. 16, No. 5:20-CV-00035; Bruni, et. al. v. Hughs, in the SD Tex. Laredo Division				
DX-039	2020-7-10 GDN Article "There's another story behind the 'Dignified Resignation' statute" - DEFS00040112-15 (Comments Redacted)		FRE 802 (Hearsay)		
DX-040	2020-9-14 GDN Article "Galveston grocery store's 'Planet of the Apes' mural sparks controversy" - DEFS00040051-54 (comments redacted)		FRE 802 (Hearsay)		
DX-041	2020-11-1 Nov General Election - DEFS00031073				
DX-042	2020-11-20 Article - Safety, not shenanigans, left church off island polling site list DEFS00040004-8		FRE 802 (Hearsay)		
DX-043	2020-11-25 Email from Paul Ready to Henry, Drummond and Van Horn re Galveston County, Texas proposed engagement - 2020 census redistricting - DEFS00028158-28164				
DX-044	Withdrawn (JX 9)				
DX-045	Withdrawn (JX 10)				
DX-046	2021-1-13 Saludis email re redistricting preparations - DEFS00019154				
DX-047	Withdrawn (JX 11)				
DX-048	Withdrawn (JX 12)				
DX-049	2021-1-29 Holmes email to self re galv cnty profile - DEFS00029528		FRE 401 (Relevance), 403 (Prejudice, Confusion, Waste of Time)		

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No.	Description	Offer	Obj.	Date Admit	Date Deny
DX-050	2021-2-1 Sigler email to Holmes - DEFS00030084				
DX-051	2021-2-1 Email providing race counts to Holmes - DEFS00030080-83				
DX-052	Withdrawn (JX 12)				
DX-053	2021-4-11 Kimberly Yancy email with link to TedX on redistricting - NAACP00001445-1446				
DX-054	2021-4-11 Lucille McGaskey and Kimberly Yancy emails re: Hiring Dale Oldham - NAACP00001441-42				
DX-055	2021-4-12 GCDP Email on Neil Barron discussion on redistricting - NAACP00001179		FRE 401 (Relevance), 403 (Prejudice, Confusion, Waste of Time); FRE 802 (Hearsay)		
DX-056	2021-4-12 Lillie Ann Aleman Email re: GDN Article on hiring Dale Oldham - NAACP00001435-37				
DX-057	2021-4-12 GCD email re redistricting zoom session with Neil Barron "a local Democrat lawyer" - Holmes 001336-1338		FRE 401 (Relevance), 403 (Prejudice, Confusion, Waste of Time)		
DX-058	2021-5-20 Drummond Email to Ready and Johnson re: Asked and Answered! - DEFS00036320-22		FRE 802 (Hearsay)		
DX-059	2021-5-20 Email from R. Eldridge to Johnson - DEFS00004181-4183		FRE 802 (Hearsay)		
DX-060	2021-8-4 GALLUP Article - No preferred racial term amongst most black, hispanic adults -		FRE 802 (Hearsay)		
DX-061	2021-8-12 GDN Article Galveston County population tops 350K (DEFS00040089-95)		FRE 802 (Hearsay)		

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No.	Description	Offer	Obj.	Date Admit	Date Deny
DX-062	2021-8-13 Holmes email to self re census data - DEFS00016256				
DX-063	2021-8-24 Johnson to Commissioners re Current Voter Count by Precinct - DEFS00003808-09				
DX-064	Withdrawn (JX 14)				
DX-065	Withdrawn (JX 15)				
DX-066	Withdrawn (JX 16)				
DX-067	Withdrawn (JX 18)				
DX-068	Duplicate withdrawn				
DX-069	2021-9-10 Leichty email to Holmes to set up meeting with counsel - DEFS00016258				
DX-070	2021-9-10 GALLUP Art: US Approval of Interracial Marriage at New High of 94% - DEFS00040229-235		FRE 802 (Hearsay); FRE 401 (Relevance); Lacks Foundation; 702 (Expert testimony)		
DX-071	2021-9-11 Williamson email to groups: Redistricting Testimony needed!- (DEFS00016259)		FRE 401 (Relevance), 403 (Prejudice, Confusion, Waste of Time)		
DX-072	Withdrawn (JX 19)				
DX-073	Withdrawn (JX 20)				
DX-074	2021-9-16 Clark conference invite with GC counsel - DEFS00011693				
DX-075	Withdrawn (JX 21)				
DX-076	Withdrawn				
DX-077	Withdrawn (JX 23)				
DX-078	Withdrawn (JX 22)				

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No.	Description	Offer	Obj.	Date Admit	Date Deny
DX-079	2021-9-20 Holmes conference invite with GC Counsel - DEFS00016260				
DX-080	2021-09-20 Ready email to Holmes re census data and Dale Oldham summary - (DEFS00030116-30118)				
DX-081	2021-9-21 Holmes email to self re redistricting toolbox - DEFS00029548		FRE 401 (Relevance); 403 (Prejudice, Confusion, Waste of Time)		
DX-082	Withdrawn (JX 24)				
DX-083	2021-9-23 sigler email re Holmes projection requests - DEFS00004607		FRE 802 (Hearsay)		
DX-084	2021-9-23 Conference call invite Holmes and redistricting counsel - DEFS00016262				
DX-085	2021-9-27 Sigler email to Shannon - DEFS00010406-411				
DX-086	2021-9-27 Sigler email to Shannon re holmes does not have access - DEFS00010412				
DX-087	2021-9-28 Calendar invite for call with Judge Henry, Commissioner Apffel, Ready and Oldham - DEFS00029174				
DX-088	2021-10-11 Roxy email to Holmes with Zoom link - DEFS00029581-29582				
DX-089	2021-10-11 Williamson Email to Holmes with zoom Info - (DEFS00029583-84)				
DX-090	2021-10-14 Williamson complaint to Tx Senate - Williamson Ex 11		FRE 401 (Relevance); 403 (Prejudice, Confusion, Waste of Time)		
DX-091	Withdrawn (JX 25)				

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No.	Description	Offer	Obj.	Date Admit	Date Deny
DX-092	2021 10 22 Oldham email to Bryan re current voter count DEFS00036213, DEFS00035200 (native printed to PDF)				
DX-093	2021-10-22 Jed Webb zoom link to Holmes on redistricting call - DEFS00016263				
DX-094	2021-10-25 Ready email to Oldham re: Galveston County Maps - DEFS00036333				
DX-095	2021-10-26 Holmes email to Roxy re community advocacy - DEFS00029586; Williamson Ex 9				
DX-096	2021-10-26 Ready email to Bryan and Oldham - DEFS00036216-18				
DX-097	2021-10-26 Williamson email to Holmes Fwd: letter to Galveston County Commissioners Court - DEFS00029587-88				
DX-098	2021-10-28 Drummond email re: delay - DEFS00036345-47				
DX-099	2021-10-29 Roxy Williamson Email on Redistricting - NAACP00000930				
DX-100	2021-10-29 Lofton Email with Roxy Williamson re: quick call - NAACP00001531-34				
DX-101	Withdrawn (JX 31)				
DX-102	Withdrawn (JX 29)				
DX-103	Withdrawn (JX 30)				
DX-104	Withdrawn (JX 32)				
DX-105	2021-10-29 Drummond email to Oldham Ready re ltr from League of Women Voters - DEFS00031235				
DX-106	2021-10-29 Judge Mark Henry Facebook Post - DEFS00031054		FRE 106 (Completeness)		

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No.	Description	Offer	Obj.	Date Admit	Date Deny
DX-107	Withdrawn (JX 28)				
DX-108	Withdrawn (JX 37)				
DX-109	2021-10-30 CLS Concerns/Redistricting changes - DEFS00011040-11040				
DX-110	2021-10-31 Facebook post from J. Giusti with proposed maps and link - Giusti Ex. 7				
DX-111	Withdrawn (JX 34)				
DX-112	2021-11-1 Apffel email to Flanagan re maps - DEFS00003811				
DX-113	2021-11-2 Crowd Redistricting 101 PowerPoint Presentation - NACP0000900-919				
DX-114	Withdrawn (JX 35)				
DX-115	2021-11-2 Registered voters in Galv County - DEFS00029722				
DX-116	Withdrawn (JX 33)				
DX-117	2021-11-3 TDW Email regarding November 4, 2021 meeting with Commissioner Holmes - NAACP00001425		FRE 403 (Prejudice, Confusion, Waste of Time)		
DX-118	2021-11-3 GDN Article "Political Buzz: County's redistricting might cut out lone Democrat" - DEFS00033931-35		FRE 802 (Hearsay)		
DX-119	Withdrawn (JX 36)				
DX-120	2021-11-4 Williamson Email to groups - NAACP00000517-518				
DX-121	2021-11-4 Roxy email re redistricting - DEFS00016264-16265				
DX-122	Withdrawn (JX 37)				
DX-123	2021-11-4 Williamson text to Heidi (Holmes 000310)		403 (Prejudice, Confusion, Waste of Time)		

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No.	Description	Offer	Obj.	Date Admit	Date Deny
DX-124	2021-11-4 Tex. Democratic Women of Galv. County Meeting Agenda - US0001539-40		FRE 401 (Relevance); 403 (Prejudice, Confusion, Waste of Time)		
DX-125	2021-11-5 GCDP Email string on public comment to maps - NAACP00001149-53		403 (Prejudice, Confusion, Waste of Time)		
DX-126	2021-11-5 GDN Art. Re: redistricting update - Holmes 001344-46		403 (Prejudice, Confusion, Waste of Time)		
DX-127	2021-11-5 Email providing meets and bounds suggestions for map 1 - DEFS00030992				
DX-128	2021-11-7 Leon Phillips Email re: Redistricting Maps - NAACP00001498-938				
DX-129	Withdrawn (JX 42)				
DX-130	2021-11-7 Gordon email to GCD re Holmes meeting - Holmes 001349		FRE 401 (Relevance); 403 (Prejudice, Confusion, Waste of Time)		
DX-131	2021-11-8 Email (NAACP00000897) - NAACP00000897		FRE 401 (Relevance)		
DX-132	2021-11-8 Dunn emails with Holmes with dates - Holmes 001652-54		FRE 401 (Relevance); 403 (Prejudice, Confusion, Waste of Time)		
DX-133	2021-11-8 Invoices from Dunn Rios and Angle - Holmes 001655-58		FRE 401 (Relevance); 403 (Prejudice, Confusion, Waste of Time)		
DX-134	Withdrawn (JX 41)				

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No.	Description	Offer	Obj.	Date Admit	Date Deny
DX-135	11/9/2021 Email distribution of November 12, 2021 Agenda - DEFS00029851-54				
DX-136	2021-11-10 Roxy Williamson Email re: Redistricting - NAACP00001363-64				
DX-137	2021-11-10 Holmes email to Clift re email - DEFS00029596				
DX-138	2021-11-10 Martinez email re Constable request - DEFS00030062-64				
DX-139	2021-11-10 Email and Letter from Bolivar constituent - DEFS00011042-DEFS00011047				
DX-140	2021-11-11 Roxy Williamson Email re: Houston Public Media article - NAACP00001361-62		FRE 403 (Prejudice, Confusion, Waste of Time); FRE 802 (Hearsay)		
DX-141	2021-11-11 Roxy Williamson email re: Galv. County Republic Party email - NAACP00001500-01				
DX-142	2021-11-11 Roxy Email re: redistricting townhall (redacted) - Holmes 001356-58		FRE 401 (Relevance); 403 (Prejudice, Confusion, Waste of Time)		
DX-143	2021-11-11 GCD email re: Holmes talk on redistricting - Holmes 001430		FRE 403 (Prejudice, Confusion, Waste of Time)		
DX-144	2021-11-11 Dunn emails and Angle maps - Holmes 000319-Holmes 000346		FRE 401 (Relevance); 403 (Prejudice, Confusion, Waste of Time)		

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No.	Description	Offer	Obj.	Date Admit	Date Deny
DX-145	2021-11-12 Roxy Williamson email re: November 11, 2021 Redistricting Task Force meeting - NAACP00001494-95		FRE 403 (Prejudice, Confusion, Waste of Time)		
DX-146	2021-11-12 Special Meeting Agenda - DEFS00029853-54				
DX-147	2021-11-12 Holmes maps from meeting - DEFS00011474-78				
DX-148	2021-11-12 Online Public Comments - DEFS00028664-29118				
DX-149	2021-11-12 Corrected Transcript of Commissioners Court Hearing (DEFS00031702-805)				
DX-150	2021-11-12 November meeting speaker sign in sheets - DEFS00031699-31701				
DX-151	2021-11-12 Comm Court Order Adopting Map 2 - DEFS00011470-11473				
DX-152	Withdrawn (JX 41)				
DX-153	2021-11-12 Davidson email to TJ Aulds with Public Comment summary - DEFS00003893				
DX-154	2021-11-15 Johnson email re: County Commissioner Possible Precinct - DEFS00016754-16755				
DX-155	2021-11-22 Holmes email to DOJ with Maps 1 and 2 and data - DEFS00029597-602				
DX-156	2021-11-30 Tyler email to self re Holmes notes - DEFS00029388		FRE 802 (Hearsay)		
DX-157	2021-11-30 Drummond email re redistricting process - DEFS00029387		FRE 106 (Completeness)		

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No.	Description	Offer	Obj.	Date Admit	Date Deny
DX-158	2021-12-7 TCRP email to commissioners re preservation notice - DEFS00027763-DEFS00027767		FRE 403 (Prejudice, Confusion, Waste of Time)		
DX-159	2022-3-28 Fragoso email with primary election returns - DEFS00009655-9679 (-56 submitted electronically)				
DX-160	2022-1-2 Registered voters in Galv County - DEFS00029729		FRE 401 (Relevance)		
DX-161	2022-1-10 Roxy Williamson email with DOJ attorney regarding polling locations - US0001509-10		FRE 802 (Hearsay); FRE 401 (Relevance)		
DX-162	2022-1-20 Text string provided to DOJ - US0001488-1506		FRE 802 (Hearsay)		
DX-163	2022-3-1 GC Primary Results - DEFS00031071				
DX-164	2022-3-28 Holmes emails with attorney Chen - Holmes 000574-Holmes 000580		FRE 401 (Relevance); 403 (Prejudice, Confusion, Waste of Time)		
DX-165	2022-4-8 Article - Galveston County Democrats call for action		FRE 401 (Relevance)		
DX-166	2022-4-15 Compian email with DOJ attorney re: materials and meeting - US0001449-50				
DX-167	2022-4-16 Mary Patrick email to DOJ re: meeting - US0001448		FRE 401 (Relevance)		
DX-168	2022-4-21 Email - US0001262				
DX-169	2022-4-25 Compian email to DOJ with population data attachment - US0001322-49				
DX-170	2022-5-2 GDN Article "Rumor-mongers should put up or shut up about Galveston mayor" - DEFS00040084-85		FRE 802 (Hearsay); FRE 401 (Relevance)		

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No.	Description	Offer	Obj.	Date Admit	Date Deny
DX-171	2022-5-13 Holmes email to sigler re shapefiles - DEFS00020523		FRE 401 (Relevance); 403 (Prejudice, Confusion, Waste of Time)		
DX-172	2022-5-13 Shannon email to Sigler re shapefiles - DEFS00031029		FRE 401 (Relevance); 403 (Prejudice, Confusion, Waste of Time)		
DX-173	2022-5-13 Sigler email to Holmes with shapefiles - DEFS00031030		FRE 401 (Relevance); 403 (Prejudice, Confusion, Waste of Time)		
DX-174	2022-5-24 Republican Primary Runoff - DEFS00031068		FRE 401 (Relevance)		
DX-175	2022-5-31 US Gov Web - www.census.gov "2020 Census Timeline of Important Milestones" -				
DX-176	2022-8-5 Email with Election Board Agenda - DEFS00040000-01				
DX-177	2022-8-31 Bench Trial Ruling in No. 3:13-308 - Dkt. 78		FRE 401 (Relevance); 403 (Prejudice, Confusion, Waste of Time)		
DX-178	2022-11-1 Holmes email to self re article on coalit ion districts - Holmes 001184		FRE 401 (Relevance); 403 (Prejudice, Confusion, Waste of Time)		
DX-179	2022-12-9 Mother Jones Article (www.motherjones.com_2022-12-09-21-55-16) - NAACP000000001		FRE 802 (Hearsay)		
DX-180	2022-12-02 County's proposed maps break voting power (NAACP00000018-23)		FRE 802 (Hearsay); FRE 401 (Relevance)		

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No.	Description	Offer	Obj.	Date Admit	Date Deny
DX-181	2022-12-9 Article - Lawsuit could be next in fight against redrawn (NAACP00000024-26)		FRE 802 (Hearsay)		
DX-182	Withdrawn				
DX-183	2022-12-28 Article: Major step for 'Ike Dike' has local leaders optimistic - DEFS00040062-65		FRE 802 (Hearsay)		
DX-184	Withdrawn				
DX-185	2023-4-19 DOJ Interrog Responses on Interviews		FRE 802 (Hearsay)		
DX-186	2023-4-20 Armstrong Description from GC Website - https://www.galvestoncountytexas.gov/our-county/commissioners/commissioner-4		FRE 802 (Hearsay)		
DX-187	2023-5-9 Cumulative Results Report 2020 Presidential Primary - DEFS00013518-13537				
DX-188	2023-5-9 GC General Election returns (2020 General) - DEFS00027066, 27068-27096, 27098-27126				
DX-189	Turnout and voter registration data for Galveston County maintained by Galveston County which have been produced in this case - DEFS00031099 (native)				
DX-190	Withdrawn				
DX-191	Withdrawn				
DX-192	Withdrawn				
DX-193	Bench Trial transcripts Vols 1-3, Petteway v. Galveston County, No. 3:13-cv-308 (S.D. Tex. 2013)		FRE 401 (Relevance); 403 (Prejudice, Confusion, Waste of Time)		

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Consolidated Plaintiffs' Objections to Defendants' Exhibits

No.	Description	Offer	Obj.	Date Admit	Date Deny
DX-194	Galveston County election results which have been produced in this case - https://results.texas-election.com/races				
DX-195	Texas Elections Results 1992-present available at Texas Secretary of State's Office - https://elections.sos.state.tx.us/index.htm				
DX-196	Withdrawn (JX 13)				
DX-197	Email from Johnson re: Redistricting Scheduling - DEFS00007866-7868		FRE 802 (Hearsay)		
DX-198	Email with Johnson and Sigler re: Maps for redistricting - DEFS00008053-8055		FRE 802 (Hearsay)		
DX-199	Plaintiffs' Amended Response to Defendants' First Discovery requests				
DX-200	1977-1-11 Arlington Heights opinion 429 US 252 (1977)				
DX-201	1986-6-30 Thornburg v. Gingles - 478 US 30 (1986)				
DX-202	1993-8-23 LULAC v. Clements - 999 F.2d 831 (5th Cir. 1993)				
DX-203	2021-7-1 Brnovich v. Democratic Nat'l Comm., 141 S.Ct. 2321 (2021)				
DX-204	2021-12-31 Open Meetings Law (Tex. Gov't Code 551.043)				
DX-205	2007-6-1 Political Research Quarterly art: Black-Brown Coalitions in Local School Board Elections - DEFS00040191-203		FRE 802 (Hearsay)		
DX-206	2008-10-1 Political Science & Politics: Should they dance with the one who brung 'em? Latinos and the 2008 Presidential election - DEFS00040204-211		FRE 802 (Hearsay); FRE 401 (Relevance)		

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Consolidated Plaintiffs' Objections to Defendants' Exhibits

No.	Description	Offer	Obj.	Date Admit	Date Deny
DX-207	2013-1-1 The Journal of Politics: The Return of Old-Fashioned Racism - DEFS00040215-228		FRE 802 (Hearsay); FRE 401 (Relevance)		
DX-208	2016-12-1 The R Journal art: eiCompare: Comparing Ecological inference estimates across EI and EI:RxC - DEFS00040180-90				
DX-209	2017-3-20 Package eiCompare manual - DEFS00040135				
DX-210	2018-10-1 American Economic Review Art: Why Did the Democrats Lost the South? - DEFS00040259-99; https://doi.org/10.1257/aer.20161413		FRE 802 (Hearsay); FRE 401 (Relevance)		
DX-211	2018-10-1 Chart from AER Article, pg 2837 - DEFS00040266; https://doi.org/10.1257/aer.20161413		FRE 802 (Hearsay)		
DX-212	2020-10-8 Political Behavior art.: The Inseparability of Race and Partisanship in the United States - DEFS00040236-258		FRE 802 (Hearsay); FRE 401 (Relevance)		
DX-213	2023-2-19 Package eiPack manual - DEFS00040154				
DX-214	2023-3-17 Alford Report, Fig 1 - DEFS00040176		FRE 802 (Hearsay)		
DX-215	2023-3-17 Alford Report, Fig 2 - DEFS00040177		FRE 802 (Hearsay)		
DX-216	2023-3-17 Alford Report, Fig 3 - DEFS00040178		FRE 802 (Hearsay)		
DX-217	2023-3-17 Alford Report, Table 2 - DEFS00040212		FRE 802 (Hearsay)		
DX-218	2023-3-17 Alford Report, Table 3 - DEFS00040213		FRE 802 (Hearsay)		
DX-219	2023-3-17 Alford Report, Table 5 - DEFS00040214		FRE 802 (Hearsay)		

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No.	Description	Offer	Obj.	Date Admit	Date Deny
DX-220	1900-1-0 David H. Kaye & David A. Freedman, Reference Guide on Statistics, Reference Manual on Scientific Evidence 211 (3rd ed.) -		FRE 802 (Hearsay); FRE 401 (Relevance)		
DX-221	2023-3-31 Owens Report, 5-6 -		FRE 702 (Expert Testimony);		
DX-222	2023-3-31 Owens Response Rpt - Table 2 - Owens Rpt - Table 2		FRE 702 (Expert Testimony); FRE 802 (Hearsay)		
DX-223	2023-3-31 BCVAP_Blocklevel_331 png file - Owen Report Chart		FRE 702 (Expert Testimony); FRE 802 (Hearsay)		
DX-224	2023-3-31 BCVAP_vtdlevel png file - Owen Report Chart		FRE 702 (Expert Testimony); FRE 802 (Hearsay)		
DX-225	2023-3-31 Beach_access png file - Owen Report Chart		FRE 702 (Expert Testimony); FRE 802 (Hearsay)		
DX-226	2023-3-31 Cooper1_P#_overlayHISPVTD png file - Owen Report Chart		FRE 702 (Expert Testimony); FRE 802 (Hearsay)		
DX-227	2023-3-31 Cooper2_P3HCVAP png file - Owen Report Chart		FRE 702 (Expert Testimony); FRE 802 (Hearsay)		
DX-228	2023-3-31 Fairfax_split png file - Owen Report Chart		FRE 702 (Expert Testimony); FRE 802 (Hearsay)		
DX-229	2023-3-31 Pop_Change_cities png file - Owen Report Chart		FRE 702 (Expert Testimony); FRE 802 (Hearsay)		
DX-230	2023-3-31 Robinson_auto png gile - Owen Report Chart		FRE 702 (Expert Testimony); FRE 802 (Hearsay)		
DX-231	2023-5-9 Owens Report, 12 -		FRE 702 (Expert Testimony); FRE 802 (Hearsay)		

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Consolidated Plaintiffs' Objections to Defendants' Exhibits

No.	Description	Offer	Obj.	Date Admit	Date Deny
DX-232	2023-1-20 Demonstrative Exhibit (Cooper Exhibit D) -				
DX-233	2023-5-12 Cooper Report, Fig 1 -				
DX-234	2023-5-12 Cooper Report, Fig 4 -				
DX-235	2023-5-12 Voting age population document -				
DX-236	2023-6-14 Cooper Report, Ex C, Fig 4 -				
DX-237	William Cooper Report - Ex.D -				
DX-238	Cooper Report, Map 2 -				
DX-239	Cooper Report, Map 3 -				
DX-240	Cooper Report, Fig 14, 16 -				
DX-241	Fairfax Report, Fig 1 -				
DX-242	2022-10-29 Houst. Chronicle Art: Why it's harder than ever to reliably poll - https://www.houstonchronicle.com/politics/texas/article/Polling-Texas-voters-has-never-been-more-17541736.php		FRE 802 (Hearsay); FRE 401 (Relevance)		
DX-243	2023-1-1 Statement on Standards of Professional Conduct - American Historical Association - Krochmal Ex 6		FRE 802 (Hearsay)		
DX-244	2011-3-1 Art: On the meaning measurement, and implications of racial resentment - Lafleur Ex 3		FRE 802 (Hearsay)		
DX-245	2021-2-3 Annual Review of Political Science: The persistence of racial cues and appeals in american elections - Lafleur Ex 5		FRE 802 (Hearsay)		
DX-246	2023-4-23 Description of DRA 2020 "Demographic Data" - https://davesredistricting.org/maps#aboutdata				
DX-247	2023-4-23 Texas Tribune Data on GISD (accountability ratings 2018-19) -		FRE 802 (Hearsay)		
DX-248	Barreto Report, Appendix A, Table 1 -				

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No.	Description	Offer	Obj.	Date Admit	Date Deny
DX-249	Barreto Report, Appendix A, Table 2 -				
DX-250	Journal of Politics: What leads racially resentful voters to choose black candidates - Lafleur Ex 4				
DX-251	Oskooii Report, Ex C, Fig 8 -				
DX-252	Oskooii Report, Ex C, Fig 9 -				
DX-253	Oskooii Report, Fig 1 -				
DX-254	Rush Report, Plan 1 -				
DX-255	Rush Report (Demonstratives), 28 - Rush Demonstrative 1, 2, 3				
DX-256	Trounstine Report, A-27-28 -				
DX-257	Trounstine Report, A-30-32 -				
DX-258	Trounstine Report, A-19 -				
DX-259	2021-10-15 - Spreadsheet - DEFS00031696		FRE 106 (Completeness) - lacks family		
DX-260	2021-10-17 - Spreadsheet - DEFS00036197		FRE 106 (Completeness) - lacks family		
DX-261	2021-10-19 - Spreadsheet - DEFS00036204		FRE 106 (Completeness) - lacks family		
DX-262	2021-10-19 - Spreadsheet (updated) - DEFS00036208		FRE 106 (Completeness) - lacks family		
DX-263	2021-10-21 - Spreadsheet - DEFS00011251		FRE 106 (Completeness) - lacks family		
DX-264	2021-10-22 - Spreadsheet - DEFS00036212		FRE 106 (Completeness) - lacks family		
DX-265	2021-10-22 - Spreadsheet - DEFS00027895				

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No.	Description	Offer	Obj.	Date Admit	Date Deny
DX-266	2021 10 22 - Spreadsheet - DEFS00011262		FRE 106 (Completeness) - lacks family		
DX-267	2021-08-01 - Active Voters in Galveston County - DEFS00035200		FRE 106 (Completeness) - lacks family		
DX-268	2021-10-26 - Spreadsheet - DEFS00011286		FRE 106 (Completeness) - lacks family		
DX-269	2021-10-21 - Galveston Blocks Map - DEFS00028014		FRE 106 (Completeness) - lacks family		
DX-270	Galveston Blocks Map 1 - DEFS00028013, 28015		FRE 106 (Completeness) - lacks family		
DX-271	2021-10-28 - Spreadsheet - DEFS00028020				
DX-272	2021-10-28 - Spreadsheet - DEFS00035518		FRE 106 (Completeness) - lacks family		
DX-273	Draft Optimal D PDF - DEFS00036813-DEFS00036814		FRE 901 (Authenticity / Foundation) - Master Date is 9/12/2022		
DX-274	Withdrawn (JX 7)				
DX-275	Optimal Geo Map PDF - DEFS00036819-DEFS00036820		FRE 901 (Authenticity / Foundation) - Master Date is 9/12/2022		
DX-276	2021-10-21 - Galveston Map 2 - DEFS00027893		FRE 901 (Authenticity / Foundation) - Master Date is 9/12/2022		

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No.	Description	Offer	Obj.	Date Admit	Date Deny
DX-277	2021-10-21 - Galveston Map 1 - DEFS00027894		FRE 901 (Authenticity / Foundation) - Master Date is 9/12/2022		
DX-278	Galveston Map 1 with substantially split precincts - DEFS00027901		FRE 901 (Authenticity / Foundation) - Master Date is 9/12/2022		
DX-279	Galveston Map 2 with substantially split precincts - DEFS00027902		FRE 901 (Authenticity / Foundation) - Master Date is 9/12/2022		
DX-280	2021-10-28 - Galveston Map 1 - DEFS00028017		FRE 901 (Authenticity / Foundation) - Master Date is 9/12/2022		
DX-281	2021-10-28 - Galveston Map 2 - DEFS00028018		FRE 901 (Authenticity / Foundation) - Master Date is 9/12/2022		
DX-282	Fair Lines Data on Galveston Demographic Shifts - DEFS00030117; DEFS00030116				

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No.	Description	Offer	Obj.	Date Admit	Date Deny
DX-283	Map 1/Map 2 shapefiles - DEFS00028029, DEFS00028030, DEFS00028031, DEFS00028032, DEFS00028033, DEFS00028034, DEFS00032933, DEFS00032926, DEFS00032927-DEFS00032928, DEFS00032926, DEFS00032929, DEFS00032930, DEFS00032931, DEFS00032932, DEFS00039234, DEFS00032935, DEFS00032936, DEFS00032937, DEFS00032938, DEFS00032939		FRE 106 (Completeness) - lacks families		
DX-284	2021-10-15 Emails between Tom Bryan and Phil Gordon and Jason Torchinsky DEFS00036191-DEFS00036193				
DX-285	2021-10-15 Emails between Tom Bryan and Phil Gordon and Jason Torchinsky DEFS00027851				
DX-286	Withdrawn (JX 25)				
DX-287	2020 11 05 Email from Sullivan to Commissioner Holmes with election night reporting results (DEFS00004117-18)				
DX-288	2020 11 16 Email from Sullivan to Comm. Holmes with election night reporting results (DEFS00004121-22)				

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

DICKINSON BAY AREA BRANCH §
NAACP, et al., §
§
Plaintiffs, §
§
v. § Civil Action No. 3:22-cv-117- JVB
§
GALVESTON COUNTY, TEXAS, et al., §
§
Defendants. §

TERRY PETTEWAY, et al., §
§
Plaintiffs, §
§
v. § Civil Action No. 3:22-cv-57-JVB
§ [Lead Consolidated Case]
§
GALVESTON COUNTY, TEXAS, et al., §
§
Defendants. §

UNITED STATES OF AMERICA, §
§
Plaintiff, §
§
v. § Civil Action No. 3:22-cv-93-JVB
§
GALVESTON COUNTY, TEXAS, et al., §
§
Defendants. §

THE PARTIES' JOINT EXHIBIT LIST

No.	Description	Offer	Obj.	Date Admit	Date Deny
JX 1	Email from M. Henry to S. Holmes re Redistricting (March 10, 2011) (DEFS00032377-79)				
JX 2	Email from S. Holmes re Proposal 3 (August 7, 2011) (DEFS00010051-52)				
JX 3	Redistricting: How will commissioners vote? - The Daily News (August 29, 2011) (DEFS00031697-98)				
JX 4	Galveston County's Submission under Section 5, Voting Rights Act of the 2011 redistricting of commissioner precincts for Galveston County, Texas and Request for Expedited Consideration (October 14, 2011) (DEFS00032018-32106)				
JX 5	Email from T. Drummond re Holmes (November 30, 2011) (DEFS00029387)				
JX 6	March 5, 2012, letter from United States Attorney General to Galveston County interposing a Section 5 objection to the 2011 commissioners court redistricting plan (DEFS00029208-212)				
JX 7	Galveston Texas Benchmark Plan Map (DEFS00036815)				
JX 8	Email from J. Compian objecting to proposed settlement of Galveston County v. United States (D.D.C.) concerning the redistricting plan adopted on March 22, 2012 (March 22, 2012) (US0001796-1816)				
JX 9	Calendar Invite from Paul Ready re Galveston County redistricting (DEFS00018648)				
JX 10	Invitation: Galveston County redistricting (December 16, 2020) (DEFS00029155-56)				
JX 11	Email from P. Ready to D. Oldham re Galveston County, Texas proposed engagement -2020 census redistricting (January 14, 2021) (DEFS00018650-52)				

No.	Description	Offer	Obj.	Date Admit	Date Deny
JX 12	Email from P. Ready to D. Oldham re engagement letter (April 5, 2021) (DEFS00011720-26)				
JX 13	Decennial Census Data from Holmes file (Holmes 001288-98)				
JX 14	Email between Paul Ready and Dale Oldham about plan for Galveston County (August 27, 2021) (DEFS00029732)				
JX 15	Email from P. Ready to L. Liechty re Call Request - Galveston County Redistricting (August 30, 2021) (DEFS00011029-30)				
JX 16	Conf Call re: Redistricting; attendees: Judge Henry, Commissioner Apffel, Paul Ready & Dale Oldham (September 8, 2021) (DEFS00011031)				
JX 17	Accepted: Conf Call re: Redistricting; attendees: Judge Henry, Commissioner Apffel, Paul Ready & Dale Oldham (September 8, 2021) (DEFS00029174)				
JX 18	Email from L. Liechty about scheduling call between Paul Ready, Dale Oldham and Commissioner Giusti for September 13th (September 10, 2021) (DEFS00017099-100)				
JX 19	Conf Call w/ Paul Ready & Dale Oldham re: Redistricting (September 13, 2021) (DEFS00015162)				
JX 20	Email from S. Holmes to L. Liechty (September 16, 2021) (DEFS00029808)				
JX 21	Email from L. Liechty to S. Holmes Conf Call re: Redistricting (September 17, 2021) (DEFS00029543-44)				
JX 22	Email from P. Ready to S. Holmes re 2020 Census data w/attachments (September 20, 2021) (DEFS00030116-17)				

No.	Description	Offer	Obj.	Date Admit	Date Deny
JX 23	Commissioner Holmes' notes (Holmes000181 - 191)				
JX 24	Email from L. Liechty to S. Holmes re 2nd Call w/ Paul Ready & Dale Oldham (September 22, 2021) (DEFS00029577)				
JX 25	Email from T. Bryan to J. Torchinsky et al. (DEFS00011238-40)				
JX 26	Email from Paul Ready to Thomas Bryan, Dale Oldham Re: Current Voter Count by Precinct (DEFS00036216-18)				
JX 27	Email from T. Drummond to D. Oldham (October 28, 2021) (DEFS00036272-74)				
JX 28	Email from V. Van Horn to N. Sigler re modified inventory (October 29, 2021) (DEFS00011894-1900)				
JX 29	Galveston Website Redistricting Webpage Capture re: Map 1 and Map 2 (October 29, 2021)				
JX 30	Email from Dale Oldham to Paul Ready attached Map 1 and 2 statistics and block assignment files (October 29, 2021) (DEFS00018656-661)				
JX 31	Email from P. Ready to S. Holmes re Draft maps and data (October 29, 2021) (DEFS00029589-94)				
JX 32	Email from N. Sigler re zoom meeting (November 1, 2021) (DEFS00018662)				
JX 33	Email Thread with Nathan Sigler, Tyler Drummond, Dale Oldham RE: MASS EMAIL ADVISORY (County Judges-326) Advisory 2021-14 - Impact of Redistricting on Certain Election Deadlines and Procedures (DEFS00036356-57)				

No.	Description	Offer	Obj.	Date Admit	Date Deny
JX 34	State of Texas, Secretary of State, Election Advisory No. 2021-14, November 1, 2021 (DEFS00011464-69)				
JX 35	Email from T. Drummond to N. Sigler re legal descriptions (November 2, 2021) (DEFS00030150)				
JX 36	Email from L. Liechty to D. Martinez re Redistricting (November 3, 2021) (DEFS00017104-05)				
JX 37	Email from T. Drummond to S. Holmes re Galveston County Redistricting (November 4, 2021) (Holmes 000300-05)				
JX 38	Email from L. Liechty re Commissioners Court Special Meeting Agenda - November 12th (November 9, 2021) (DEFS00027750-52)				
JX 39	Email from D. Martinez to M. Henry re DRAFT 11-12-21 (November 9, 2021) (DEFS00029383-85)				
JX 40	Galveston County Texas Special Meeting Agenda (November 9, 2021) (DEFS00011914-15)				
JX 41	Galveston County Sp. Session - Minutes (November 12, 2021) (DEFS00040086-88)				
JX 42	Compilation of All Online Public Comments (November 20, 2021) (DEFS00003314-3781)				
JX 43	November 12, 2021 Special Session - Signatures of Guest Speakers during Special Session (DEFS00031699-1701)				
JX 44	Galveston Co. Comm. Court Order Establishing New Comm. Prec. Boundaries (November 12, 2021) (DEFS00011470-73)				

Respectfully Submitted,

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Petteway v. Galv. Cnty., 3:22-cv-57
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UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION

TERRY PETTEWAY, <i>et al.</i> ,	§	
	§	
<i>Plaintiffs,</i>	§	
	§	
v.	§	
	§	Civil Action No. 3:22-cv-57
GALVESTON, TEXAS, <i>et al.</i> ,	§	
	§	
<i>Defendants.</i>	§	

UNITED STATES OF AMERICA,	§	
	§	
<i>Plaintiff,</i>	§	
	§	
v.	§	
	§	Civil Action No. 3:22-cv-93
GALVESTON, TEXAS, <i>et al.</i> ,	§	
	§	
<i>Defendants.</i>	§	

Dickinson Bay Area Branch NAACP, <i>et al.</i> ,	§	
	§	
<i>Plaintiffs,</i>	§	
	§	
v.	§	
	§	Civil Action No. 3:22-cv-117
GALVESTON, TEXAS, <i>et al.</i> ,	§	
	§	
<i>Defendants.</i>	§	

CONSOLIDATED PLAINTIFFS' TRIAL WITNESS LIST

Will Call

1. Darrell Apffel
2. Matt Barreto, PhD
3. Traci Burch, PhD
4. William Cooper

5. Edna Courville
6. Dickinson Bay Area Branch NAACP Representative (Lucretia Lofton)
7. Anthony Fairfax
8. Joe Giusti
9. Mark Henry
10. Stephen Holmes
11. Max Krochmal, PhD
12. LULAC Council 151 Representative (Joe Compian)
13. Kassra Oskooii, PhD
14. Terry Petteway
15. Penny Pope
16. Rene Rocha, PhD
17. Derreck Rose
18. Tye Rush
19. LaFleur Stephens-Dougan, PhD
20. Jessica Trounstine, PhD

May Call

21. Matt Angle
22. Dr. Robin Armstrong
23. Thomas Bryan
24. Patrick Doyle
25. Tyler Drummond
26. Wendi Fragoso
27. Galveston Branch NAACP Representative (Pat Toliver)
28. Roxy Hall Williamson
29. Joe Jaworski
30. Cheryl Johnson
31. Sharon Lewis
32. LULAC Council 151 Representative (Robert Quintero)
33. Mainland Branch NAACP Representative (Barbara Anders)
34. Dianna Martinez
35. Lucille McGaskey
36. Mike Montez
37. Dale Oldham
38. Leon Phillips
39. Reverend William Lloyd Randall
40. Michael Rios
41. Mark Salinas
42. Michael Shannon
43. Nathan Sigler

44. Dwight Sullivan

Plaintiffs reserve the right to call witnesses identified by other parties to this case, to use deposition testimony and exhibits to those depositions for witnesses who are unavailable, and to use any deposition testimony or to call witnesses needed for rebuttal or impeachment.

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

TERRY PETTEWAY, <i>et al.</i> ,	§	
	§	
<i>Plaintiffs,</i>	§	
	§	
v.	§	
	§	Civil Action No. 3:22-cv-57
GALVESTON, TEXAS, <i>et al.</i> ,	§	
	§	
<i>Defendants.</i>	§	

UNITED STATES OF AMERICA,	§	
	§	
<i>Plaintiff,</i>	§	
	§	
v.	§	
	§	Civil Action No. 3:22-cv-93
GALVESTON, TEXAS, <i>et al.</i> ,	§	
	§	
<i>Defendants.</i>	§	

Dickinson Bay Area Branch NAACP, <i>et al.</i> ,	§	
	§	
<i>Plaintiffs,</i>	§	
	§	
v.	§	
	§	Civil Action No. 3:22-cv-117
GALVESTON, TEXAS, <i>et al.</i> ,	§	
	§	
<i>Defendants.</i>	§	

**CONSOLIDATED PLAINTIFFS’ OBJECTIONS TO DEFENDANTS’ TRIAL
WITNESS LIST**

Plaintiffs object to the inclusion of the following witnesses to Defendants’ trial witness list:

1. Sarah Chen
2. Chad Dunn

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

TERRY PETTEWAY, THE
HONORABLE DERRECK ROSE,
and PENNY POPE,

Plaintiffs,

v.

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

Defendants.

Civil Action No. 3:22-cv-57

UNITED STATES OF AMERICA,

Plaintiff,

v.

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

Defendants.

Civil Action No. 3:22-cv-93

DICKINSON BAY AREA BRANCH
NAACP, GALVESTON BRANCH
NAACP, MAINLAND BRANCH
NAACP, GALVESTON LULAC
COUNCIL 151, EDNA COURVILLE,
JOE A. COMPIAN, and LEON
PHILLIPS,

Civil Action No. 3:22-cv-117

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

JOINT STIPULATED FACTS

	Fact
1.	Galveston County is a political and geographical subdivision of the State of Texas, located in southeast Texas on the Gulf of Mexico and borders Harris, Brazoria, and Chambers Counties.
2.	The Galveston County Commissioners Court consists of a County Judge elected at-large, who serves as the presiding officer, and four commissioners elected from single-member districts, called “precincts,” to serve four-year, staggered terms.
3.	If a vacancy on the Commissioners Court occurs, the County Judge appoints someone to fill the vacancy until the next scheduled general election.
4.	Members of the Commissioners Court are elected in partisan elections with a majority-vote requirement in the party primary.
5.	The 2020 Census P.L. 94-171 redistricting data set reported that Galveston County had a total population of 350,682 persons.
6.	According to the 2020 Census P.L. 94-171 redistricting data set, Galveston County’s 2020 Census population consisted of 191,358 (54.6%) persons who were non-Hispanic white, 88,636 (25.3%) persons who were Hispanic, and 45,637 (13.0%) who were non-Hispanic Black.
7.	According to the 2020 Census, the County has a total voting age population of 267,382, of whom 155,020 (58%) are non-Hispanic White, 60,159 (22.5%) are Hispanic, and 33,341 (12.5%) are non-Hispanic Black.
8.	The proportion of non-Hispanic white residents in Galveston County decreased between the 2010 Census and the 2020 Census, from 59.3% in 2010 to 54.6% in 2020, while the proportion of the Hispanic population grew from 22.4% to 25.3% during the same time period.

9.	Galveston County's total population grew by 59,373, approximately 20%, between the 2010 and 2020 Censuses. The total Hispanic population grew from approximately 65,270 in 2010 to 88,636 in 2020, and the total non-Hispanic Black population grew from 39,229 to 43,120.
10.	The 2020 Census revealed population imbalances in the Galveston County Commissioners Court precincts under the 2012 Commissioner precincts that required redistricting in 2021.
11.	The four commissioners at the time the Galveston County Commissioners Court adopted the 2021 redistricting plan in November 2021 and at the time when the United States filed its complaint in this case on March 24, 2022, were: Darrell Apffel, who represents Precinct 1 and has served on the Commissioners Court since 2016; Joseph Giusti, who represents Precinct 2 and has served on the Commissioners Court since 2014; Stephen Holmes, who represents Precinct 3 and has served on the Commissioners Court since 1999; and Kenneth Clark, who represented Precinct 4 and had served on the Commissioners Court since 1998.
12.	Galveston County Judge Mark Henry was first elected in 2010.
13.	Commissioner Kenneth Clark was the sole Republican on the Galveston County Commissioners Court from his 1998 election until 2010.
14.	Commissioner Dr. Robin Armstrong, who is Black, was appointed to represent Galveston County Commissioners Court Precinct 4 in May 2022 following the death of Commissioner Kenneth Clark. Commissioner Armstrong was elected as Commissioner of Precinct 4 in November 2022. He ran unopposed.
15.	Wayne Johnson was the first Black member of the Galveston County Commissioners Court, and he represented Precinct 3 from 1988 to 1999.
16.	Commissioner Stephen Holmes was appointed to represent Precinct 3 following Wayne Johnson's death in 1999 and, until 2022, was the sole Black member of the Galveston County Commissioners Court.
17.	The U.S. Attorney General did not interpose any objection to Galveston County's 2001 redistricting plan for the Commissioners Court, justice of the peace and constable precincts.
18.	The Galveston County Commissioners Court approved the retention of outside redistricting counsel at an April 5, 2021 meeting, and Commissioner Stephen Holmes voted against this.
19.	On August 12, 2021, the United States Bureau of the Census released P.L. 94-171 data.
20.	On October 29, 2021, two proposed maps, Map 1 and Map 2, were posted on the Galveston County website along with a form for public comment.

21.	The webpage containing the proposed Map 1 and Map 2 stated, in part, that “The Galveston County Commissioners Court will be discussing and voting to redistrict county commissioner’s precincts in the next few weeks. Below are the two proposed maps that will be considered. Public comment is now open for county residents via the form on this page.”
22.	On November 12, 2021, two weeks after the proposed plans, Map 1 and Map 2, were posted on the Galveston County website, the Commissioners Court held a special session at 1:30 p.m. to consider and vote on the proposed plans.
23.	Approximately 440 people provided comments on the proposed commissioners court maps through the Galveston County website as of one hour before the special session on November 12, 2021.
24.	The Calder Road Annex, where the special session was held, is located at 174 Calder Road, League City, Texas, and is approximately 27 miles away from the Galveston County Courthouse located at 722 Moody Avenue in the City of Galveston.
25.	At the November 12, 2021, special session, the Galveston County Commissioners Court approved Map 2 with a vote of 3-1. County Judge Mark Henry, Commissioner Joseph Giusti, and Commissioner Darrell Apffel voted in favor of Map 2, Commissioner Stephen Holmes voted against Map 2, and Commissioner Kenneth Clark was not present.
26.	The Census data estimates show that Black and Hispanic citizens are approximately 27.5% of the citizen voting age population in Precinct 3 of Galveston County’s adopted 2021 commissioners court plan.
27.	The Mainland Branch NAACP, Dickinson Bay Area Branch NAACP, and Galveston Branch NAACP are nonprofit, nonpartisan membership organizations and are affiliate branches of the Texas State Conference of the NAACP.
28.	Galveston LULAC Council 151 is an independent unit of the national organization League of United Latin American Citizens (“LULAC”).