

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

TERRY PETTEWAY, et al. Plaintiffs,	§ § §	
v.	§	Civil Action No. 3:22-CV-00057
GALVESTON COUNTY, TEXAS, et al. Defendants.	§ § § § §	(consolidated)
UNITED STATES OF AMERICA, Plaintiffs,	§ § §	
v.	§	Civil Action No. 3:22-CV-00093
GALVESTON COUNTY, TEXAS, et al. Defendants.	§ § § § §	
DICKINSON BAY AREA BRANCH NAACP, et al. Plaintiffs,	§ § § §	
v.	§	Civil Action No. 3:22-CV-00117
GALVESTON COUNTY, TEXAS, et al. Defendants.	§ § §	

**DEFENDANTS’ OBJECTIONS TO PLAINTIFFS’
PROPOSED TRIAL EXHIBITS**

Attached as “Exhibit A” are Defendants’ objections to Plaintiffs’ proposed exhibits.

Defendants also submit the following explanations for objections to specific exhibits.

I. Relevance: “what was relevant decades ago does not shed light on current conditions or needs.”

The Supreme Court has clearly held that what was relevant decades ago does not shed light on current conditions or needs. *See Shelby Cnty. v. Holder*, 570 U.S. 529, 552-

53 (2013) (noting “history did not end in 1965,” more than 40 years passed between preclearance laws’ enactment and their reauthorization in 2006, and focusing on “decades-old data relevant to decades-old problems, rather than current data reflecting current needs” was not appropriate). As the Court has stated in the context of the Fifteenth Amendment, it is “not designed to punish for the past; its purpose is to ensure a better future.” *Id.*

The broad reach of Section 5 of the Voting Rights Act (“VRA”) was upheld in the past based on situations that “have unquestionably improved.” *Nw. Austin Mun. Util. Dist. No. One v. Holder*, 557 U.S. 193, 202 (2009) (“Things have changed in the South. Voter turnout and registration rates now approach parity. Blatantly discriminatory evasions of federal decrees are rare. And minority candidates hold office at unprecedented levels”). In *Northwest Austin*, decided 14 years ago, the Court held the VRA “imposes current burdens and must be justified by current needs.” *Id.* As where the VRA’s coverage formula was based on stale data over 35 years old, and failed to consider current political conditions (such as the racial gap in voter registration and voter turnout rates), claims brought under Section 2 of the VRA cannot be based on stale facts. *See id.* at 203. The Court also rejected the argument that the VRA’s preclearance requirements had a “deterrent effect” and striking down Section 5 would encourage jurisdictions to resume discriminating if struck down, stating that such a theory would make Section 5 “immune from scrutiny; no matter how “clean” the record of covered jurisdictions, the argument could always be made that it was deterrence that accounted for the good behavior.” *Shelby County*, 570 U.S. at 550. In *Brnovich*, which considered a Section 2 challenge to a voting regulation, the Court held that it is relevant to consider current conditions and how they have improved. *See Brnovich*

v. Democratic Nat'l Comm., 141 S. Ct. 2321, 2338-2339 (2021) (explaining “partisan motives are not the same as racial motives”).

The following proposed exhibits are irrelevant to the issues and claims at trial for the reasons expressed in *Northwest Austin, Shelby County*, and *Brnovich*, and should not be admitted:

No.	Date	Description
PX 1	3/10/1976	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
PX 2	3/17/1992	United States March 17, 1992, letter to Galveston County from the Attorney General interposing a Section 5 objection to the 1991 redistricting plan for justice of the peace/constable districts in Galveston County, Texas
PX 3	12/14/1992	United States December 14, 1992, letter to the City of Galveston from the Attorney General interposing a Section 5 objection to the change in method of electing the city council from six single-member districts to four single-member districts and two at large with numbered posts, a change from a plurality to a majority vote requirement, redistricting criteria and revised recall procedures for the City of Galveston, Texas
PX 4	12/14/1998	United States December 14, 1998, letter to the City of Galveston from the Attorney General interposing a Section 5 objection to the change in method of electing the city council from at large to four single-member districts and two at large by numbered posts for concurrent terms; the redistricting plan; the elimination of the majority vote requirement for city council and mayoral elections; the shortening of mayoral and council terms from three years to two years; the change in maximum number of consecutive terms from two to three; and the implementation schedule for the City of Galveston in Galveston County, Texas
PX 563	8/19/1992	<i>Leroy Hoskins et al. vs. John Hannah et al.</i> , Civil Action No. G-92-12 (S.D. Texas 1992), Consent Judgment and Election Order
PX 564	7/20/2007	United States of America v. Galveston County, Consent Decree Judgment and Order (July 20, 2007)

II. Hearsay – News Articles

Defendants object to the admission of news articles to prove the truth of the matter asserted. The Fifth Circuit has held that news articles contain inadmissible hearsay. *Dallas Cnty. v. Commercial Union Assur. Co.*, 286 F.2d 388, 391–92 (5th Cir. 1961) (“Of course, a newspaper article is hearsay, and in almost all circumstances is inadmissible”). As has occurred in depositions, witnesses may lack personal knowledge of the statements therein, and the comments within them may be speculative and irrelevant to the issues before the Court. While certain exceptions to the rule against hearsay may exist for specific articles, or for use with specific witnesses, Defendants object to the automatic inclusion of such articles into the record without establishing admissibility.

Objections are fully listed in Exhibit A, including the following:

No.	Date	Description
PX 62	4/15/2012	Forrest Wilder, “Galveston’s Nasty Public Housing Fight.” Texas Observer. April 5, 2012. https://www.texasobserver.org/galvestons-nasty-public-housing-fight
PX 65	8/21/2013	Email from R. Dennard to T. Drummond re Chronicle article today (August 21, 2013) **email contains a copied and pasted article
PX 68	5/20/2014	Giusti accused of earning county pay on private job (May 20, 2014)
PX 69	5/30/2014	Christopher Smith Gonzalez and T.J. Aulds. “LM police group calls for investigation after alleged racist remarks.” Galveston County Daily News. May 30, 2014. https://www.galvnews.com/news/free/article_077059c8-e83e-11e3-8b66-001a4bcf6878.html
PX 70	6/4/2014	Joel Eisenbaum. “Member of La Marque city council recorded making racist remarks.” https://www.click2houston.com/news/2014/06/04/member-of-la-marque-city-council-recorded-making-racistremarks/
PX 71	8/12/2014	Harvey Rice. “La Marque councilwoman faces recall vote.” Houston Chronicle. August 12, 2014.

No.	Date	Description
		https://www.chron.com/neighborhood/bayarea/news/article/La-Marque-councilwoman-faces-recall-5684601.php
PX 75	11/12/2015	La Marque ISD strives to leave troubles behind (November 12, 2015)
PX 78	8/16/2017	John Wayne Ferguson,” Political Buzz: Henry says ‘no’ to removing Galveston’s Confederate statute.” Galveston County Daily News. Aug. 16, 2017, https://www.galvnews.com/news/article_4dd6245b-6917-5b86-b756-5f3b38e8f2b7.html
PX 79	1/8/2018	Big Jolly Politics Article, "Cheryl Johnson at odds with Galveston County Judge Mark Henry" (January 8, 2018)
PX 81	4/16/2018	Edgar Walters, “It’s our form of apartheid”: How Galveston stalled public housing reconstruction in the 10 years after Ike.” Texas Tribune, April 16, 2018. https://www.texastribune.org/2018/04/16/galveston-public-affordablehousing-hurricane-ike
PX 86	2/4/2019	More Civil Rights Groups Sue Over Secretary Of State's Advisory On Potential Voter Fraud - Houston Public Media (February 4, 2019)
PX 92	12/7/2019	County GOP chairwoman's racist text prompts calls for resignation (December 7, 2019)
PX 93	12/7/2019	Patrick Svitek. “Top Texas Republicans pressure a county chair to resign over racist text.” Texas Tribune. December 7, 2019. https://www.texastribune.org/2019/12/07/texas-republicans-racist-text-resign
PX 94	12/8/2019	Top Texas Republicans pressure a county chair to resign over racist text (December 8, 2019)
PX 102	2/22/2020	Daily News Article, Johnson: Peden ad 'racist,' 'discriminatory' and 'a lie' (February 22, 2020)
PX 103	2/22/2020	John Wayne Ferguson, “Johnson: Peden ad ‘racist,’ ‘discriminatory,’ and a ‘lie.’” Galveston County Daily News, February 22, 2020. https://www.galvnews.com/news/free/article_1f26ee77-55ca-5723-a493-28fdd78f15c5.html
PX 107	4/10/2020	COVID-19 Patients Given Unproven Drug In Texas Nursing Home In 'Disconcerting' Move - NPR (April 10, 2020)
PX 109	6/29/2020	COVID rise greater in Galveston County's Hispanic residents - The Daily news (June 29, 2020)
PX 110	7/1/2020	Replace Confederate statue with Juneteenth monument (July 1, 2020)

No.	Date	Description
PX 111	7/17/2020	Matt Degrood, "Galveston County law enforcement works on diversity." Galveston County Daily News, July 17, 2020. https://www.galvnews.com/news/police/free/article_036c2431-b464-5eee-aad4-5164645122ae.html
PX 112	8/24/2020	Brooke A. Lewis, "Confederate statue in Galveston County will stay put — for now." Houston Chronicle. Aug. 24, 2020), https://www.houstonchronicle.com/news/houston-texas/houston/article/Confederate-statue-in-Galveston-County-will-stay-15511484.php
PX 113	9/23/2020	Political Buzz: Galveston County Judge Henry joins GOP lawsuit to block earlier voting start (September 23, 2020)
PX 115	10/12/2020	Harmeet Kaur and Melissa Alonso, "A Black man who was led through Galveston, Texas, by police officers on horseback is suing the city for \$1 million." CNN, October 12, 2020. https://www.cnn.com/2020/10/12/us/galvestonhorseback-arrest-lawsuit-trnd/index.html
PX 118	11/20/2020	The Daily News Article: Safety, not shenanigans, left church off island polling site list, officials say (November 20, 2020)
PX 120	12/12/2020	James LaCombe, "Marchers call for action after police shooting in La Marque." Galveston County Daily News, December 12, 2020. https://www.galvnews.com/news/marchers-call-for-action-after-police-shooting-in-lamarque/article_7522734e-dbbb-5195-b2c6-54a2f0d6971e.html
PX 136	3/14/2021	Residents vow to stop housing development just outside of Santa Fe (March 14, 2021)
PX 137	3/30/2021	We will not allow our voting rights to be eroded By E. Courville (March 30, 2021)
PX 146	4/30/2021	Dr. Armstrong in the News Posted by Robin Armstrong (April 30, 2021)
PX 151	6/30/2021	Nick Natario, "Galveston County To Send COVID-19 Relief Money To fund the Border Wall and Security." June 30, 2021. https://abc13.com/texas-border-wall-counties-using-money-from-covid-relief-helping-fundnews/10844833
PX 154	7/12/2021	Article, America Counts: Upcoming Release of 2020 Census Redistricting Data Will Paint a Clearer Portrait of America (July 12, 2021)
PX 157	8/4/2021	Gallup Article - No Preferred Racial Term Among Most Black, Hispanic Adults (August 4, 2021)
PX 158	8/12/2021	Galveston County population tops 350K, according to census - The Daily News (August 12, 2021)

No.	Date	Description
PX 206	10/21/2021	Galvnews Article: 2 years after lawsuit, Galveston County again trying to purge voter rolls (October 21, 2021)
PX 273	11/9/2021	Residents call for resignation of Texas City school board member
PX 279	11/10/2021	NewsBank: Political Buzz: Does the coast want a single - The Galveston County Daily News (TX) (November 10, 2021)
PX 280	11/10/2021	The Oath Keepers Anti-Government Extremists Recruiting Military and Police
PX 294	12/7/2021	Crystal Beach Local News - Apffel introduces Joe Giusti as new Commissioner (December 7, 2021)
PX 302	2/9/2022	KPRC 2 News, Galveston County law enforcement continues sending resources to the border (February 9, 2022)
PX 308	5/17/2022	Physician appointed to fill precinct 4 commission seat in Galveston County - Galveston County Daily News (May 17, 2022)
PX 310	7/14/2022	NBCnews.com, The Dangerous Evolution of Oath Keepers- and Leader Stewart Rhodes (July 14, 2022)
PX 311	7/27/2022	Armstrong elected as GOP pick for Precinct 4 commissioner - Galveston Daily News (July 27, 2022)
PX 313	9/8/2022	Texas News, KTRK , I don't want part of that:' Galveston County commissioner explains why he once joined Oath Keepers (September 8, 2022)
PX 319	12/9/2022	This Texas County Shows Exactly How Republicans Are Rolling Back the Clock on Voting Rights (December 9, 2022)
PX 320	12/9/2022	County's proposed maps would break the voting power (December 9, 2022)
PX 329	1/3/2023	COC Annual Meeting & Elections Crystal Beach Local News (January 3, 2023)
PX 427	2/23/2023	Fwd. Email to V. Richardson of 4.10.21 email from Mary Patrick (February 23, 2023) <i>**email contains a copied and pasted article</i>
PX 565	8/17/2011	Galvnews.com Article by T.J. Aulds, <i>Judges oppose proposed redistricting plans</i> (August 17, 2011)
PX 566	3/30/2016	The Daily News Article: Commissioners Court removes Galveston polling location, adds League City for runoff early voting (March 30, 2016)
PX 567	8/8/2016	County officials approve part of plan to advertise election information; The Daily News (August 8, 2016)
PX 571	4/7/2021	Galveston County turns to GOP consultant for redistricting help - The Daily News (April 7, 2021)

No.	Date	Description
PX 578	3/22/2012	Another redistricting map set for DOJ - The Daily news (March 22, 2012)
PX 580	3/23/2012	Commissioners approve new redistricting map - Galvnews (March 23, 2012)

III. Hearsay – Declarations, Depositions, and Expert Reports/Videos

Defendants object to the admission of any declarations, expert reports, or deposition transcripts as exhibits at trial; they are inadmissible hearsay. Objections are fully listed in Exhibit A, including to the following designations by Plaintiffs:

PX 301	1/19/2022	Declaration of William S. Cooper (January 19, 2021) **Plaintiffs' expert
PX 494	5/31/2023	Declaration of Jonathan D. Brooks (DOJ geographer created 2021 plan shapefiles and demographic data) (May 31, 2023) **DOJ demographer, not on witness list or disclosures
PX 495	5/31/2023	Declaration of Lucille McGaskey (May 31, 2023)
PX 496	5/31/2023	Zoom Video recording of Drs. Barreto, Alford and Stevenson and Mr. Rios
PX 498	6/1/2023	Declaration of Joe Compian (June 1, 2021) **representative of Organization Plaintiffs
PX 499	6/1/2023	Jun. 1, 2023 Declaration of Robert Quintero **representative of Organization Plaintiffs
PX 500	6/1/2023	Jun. 1, 2023 Declaration of Sharon B. Lewis
PX 501	6/1/2023	Jun. 1, 2023 Declaration of Jessica Trounstine (United States) Expert Witness
PX 503	6/2/2023	Jun. 2, 2023 Declaration of Tye Rush (Petteway) Expert Witness
PX 66	12/30/2013	Dec. 30, 2013 Transcript of Oral Deposition of Judge Mark Henry
PX 327	12/22/2022	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.)

IV. Hearsay - Websites/Letters

Defendants object to the admission of Website content and unverified letters as exhibits in trial; they are inadmissible hearsay. Objections are fully listed in Exhibit A, including to the following:

PX 425	2/15/2023	Cheryl Johnson Campaign Website (February 15, 2023) [http://vote4cheryl.com]
PX 432	3/8/2023	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. (March 8, 2023)
PX 573	1/17/2023	Opening Meetings Act Handbook 2022 (used on Jan. 17, 2023)
PX 569	3/15/2021	Mar. 15, 2021 U.S. Census Bureau Statement on Release of Legacy Format Summary Redistricting Data File - Press Release
PX 572	5/31/2022	2020 Census Timeline of Important Milestones, https://www.census.gov/programs-surveys/decennial-census/decade/2020/planning-management/release/timeline.html

V. Hearsay - Publications/Website Materials

Defendants object to the admission of publications and articles as exhibits at trial to prove the truth of the matter asserted; they contain inadmissible hearsay. Objections are fully listed in Exhibit A, including to the following:

No.	Date	Description
PX 119	12/4/2020	What Leads Racially Resentful Voters to Choose Black Candidates? (December 4, 2020)
PX 12	3/2011	On the Meaning, Measurement, and Implications of Racial Resentment (March, 2011)
PX 134	2/3/2021	Annual Review of Political Science The Persistence of Racial Cues and Appeals in American Elections (February 3, 2021)
PX 77	3/17/2016	Cambridge University Press: Improving Ecological Inference by Predicting Individual Ethnicity from Voter Registration Records (March 17, 2016)
PX 459	4/13/2023	Battle for the Heart of Texas Political Change in the Electorate – Excerpts

		**If admitted Defendants may seek to offer additional portions under FRE 106 as necessary
PX 6	5/1/2005	Article by J. Alford et al., <i>Are Political Orientations Genetically Transmitted?</i> (May 1, 2005)
PX 108	6/21/2020	Selected Socio Economic Data, Galveston County, Texas (2015-2019 American Community Survey 5-Year Estimates)
PX 168	9/1/2021	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 (Published September 1, 2021)
PX 568	2/12/2021	U.S. Census Bureau Statement on Redistricting Data Timeline (February 12, 2021), https://www.census.gov/newsroom/press-releases/2021/statement-redistricting-data-timeline.html
PX 569	3/15/2021	U.S. Census Bureau Statement on Release of Legacy Format Summary Redistricting Data File - Press release (March 15, 2021)

VI. Not Timely Produced or Disclosed/Authentication

Defendants object to the admission of documents and information not timely produced or disclosed in this litigation. Objections are fully listed in Exhibit A, including to the following:

PX 5	3/9/2000	OMB Guidance on Aggregation and Allocation of Data on Race for Use in Civil Rights Monitoring and Enforcement *provided in an email on 7/14/23
PX 140	4/5/2021	Transcription of portion of Apr. 5, 2021 Galveston County Commissioners Court Meeting *provided in an email on 7/13/23
PX 314	9/30/2022	Sept. 30, 2022 M. Henry Tweet, https://twitter.com/JudgeMarkHenry/status/1575916835811139584?cxt=HHwWgICloeeA5N4rAAAA *provided via link in Plaintiffs' trial exhibit list
PX 575	N/A	Summary Exhibit of Enacted and Proposed Maps *provided in an email on 7/13/23
PX 568	2/12/2021	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 *provided via link in Plaintiffs' trial exhibit list

VII. FRE 401/403 – Irrelevant and Confusing Issues

Defendants object to the use of documents and information that is wholly irrelevant to this litigation, and which confuse the issues and elements of proof in this case. For example, for the Voting Rights Act vote dilution claim, Plaintiffs must show the three *Gingles* preconditions, and then the “Senate factors” may be considered:

1. the extent of any history of official discrimination in the state or political subdivision **that touched the right of the members of the minority group to register, to vote, or otherwise to participate in the democratic process;**
2. the extent to which voting in the elections of the state or political subdivision is racially polarized;
3. the extent to which the state or political subdivision has used unusually large election districts, majority vote requirements, anti-single shot provisions, or other voting practices or procedures that may enhance the opportunity for discrimination against the minority group;
4. whether members of the minority group have been denied access to [any candidate slating] process;
5. the extent to which members of the minority group in the state or political subdivision bear the effects of discrimination in such areas as education, employment and health, **which hinder their ability to participate effectively in the political process;**
6. whether political campaigns have been characterized by overt or subtle racial appeals; [and]
7. the extent to which members of the minority group have been elected to public office in the jurisdiction.
8. whether there is a significant lack of responsiveness on the part of elected officials to the particularized needs of the members of the minority group; [and]
9. whether the policy underlying the state or political subdivision's use of such voting qualification, prerequisite to voting, or standard, practice or procedure is tenuous.

See Thornburg v. Gingles, 478 U.S. 30 (1986); *Anne Harding v. Cnty. of Dallas*, 948 F.3d 302 (5th Cir. 2020). Under *Gingles* factor 1, for example, evidence concerning discrimination would be relevant if it (a) involves *official* discrimination in Galveston

County, and (b) touches on the right of the members of the minority group to register, vote, or participate in the electoral process.

Plaintiffs offer several exhibits that are irrelevant, and confuse the issues before the Court. Objections are fully listed in Exhibit A, examples of which are:

PX 300	1/1/2022	Jan. 1, 2022 Platform and Resolutions as Amended and Adopted by the 2022 State Convention of the Republican Party of Texas
PX 7	8/12/2010	Beirne, Maynard & Parsons L.L.P. 2010 Statement of Qualifications
PX 8	11/4/2010	Nov. 4, 2010 Email from E. Courville to S. Holmes re Temporary Appointee for JP Position, Precinct 3
PX 40	8/22/2011	Aug. 22, 2011 Resolution No. 1165 from the City of La Marque re: 2011 Justice of the Peace/Constable Plan
PX 69	5/30/2014	May 30, 2014 Galveston County Daily News Article by C. Smith Gonzalez and T.J. Aulds, LM police group calls for investigation after alleged racist remarks, https://www.galvnews.com/news/free/lm-police-group-calls-for-investigation-after-alleged-racist-remarks/article_077059c8-e83e-11e3-8b66-001a4bcf6878.html
PX 80	4/3/2018	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
PX 107	4/10/2020	Apr. 10, 2020 NPR Article by V. Romo, COVID-19 Patients Given Unproven Drug In Texas Nursing Home In 'Disconcerting' Move, https://www.npr.org/2020/04/10/830348837/covid-19-patients-given-unproven-drug-in-texas-nursing-home-garnering-criticism
PX 305	2/25/2022	Dr. Robin Armstrong, "Stand Up." https://www.youtube.com/watch?v=StikJDXxAkM
PX 425	2/15/2023	Feb. 15, 2023 Cheryl Johnson Campaign Website, http://vote4cheryl.com
PX 539	5/10/2001	Scan of adopted 2001 redistricting criteria
PX 540	12/7/2001	Scan of portion of 2001 preclearance submission

VIII. FRE 403 - Prejudice

Defendants object to the use of documents and information that would inject wholly irrelevant, inflammatory and prejudicial topics into this litigation:

PX 73	8/21/2015	Aug. 21, 2015 D. Apffel Tweet re: Oath Keepers
PX 141	4/7/2021	Apr. 7, 2021 Email from Z. Davidson to T. Drummond re: FW: Oldham/redistricting retention letter
PX 280	11/10/2021	Anti-Defamation League Article, The Oath Keepers: Anti-Government Extremists Recruiting Military and Police
PX 310	7/14/2022	Jul. 14, 2022 NBCnews.com Article by J. Lewis, The Dangerous Evolution of Oath Keepers-and Leader Stewart Rhodes, https://www.nbcnews.com/think/opinion/january-6-hearings-oath-keepers-testimony-revealed-dangerous-pivot-rcna38130
PX 313	9/8/2022	Sept. 8, 2022 Texas News, KTRK Article by D. Lewis, I don't want part of that:' Galveston County commissioner explains why he once joined Oath Keepers, https://abc13.com/galveston-county-commissioner-joe-giusti-once-member-of-oath-keepers-far-right-extremist-group/12213674/

IX. FRE 408 Settlement Discussions

Defendants object to the admission of settlement negotiations under Rule 409:

PX 59	3/15/2012	Mar. 15, 2012 Email from M. Fitzgerald to M. Henry et al. re: FW: Commissioner Precincts, attaching Commissioners Proposal (Settlement Discussions Only)
PX 61	3/20/2012	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

Defendants pray the Court grant their objections, and exclude exhibits that are irrelevant, inadmissible hearsay, untimely produced, prejudicial/confuse the issues,

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CERTIFICATE OF SERVICE

I certify that a true and correct copy of the foregoing was served to all counsel of record via the ECF e-filing system on July 18, 2023.

/s/Angie Olalde

Defendants' Objections to Plaintiffs' Exhibits

PX No.	Doc Date	Description	Beg Bates	End Bates	Defendants' Objections	Plaintiffs Notes on Revisions	References
1	3/10/1976	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	US0000001	US0000002	Relevance		
2	3/17/1992	United States March 17, 1992, letter to Galveston County from the Attorney General interposing a Section 5 objection to the 1991 redistricting plan for justice of the peace/constable districts in Galveston County, Texas	US0000003	US0000004	Relevance		
3	12/14/1992	United States December 14, 1992, letter to the City of Galveston from the Attorney General interposing a Section 5 objection	US0000005	US0000007	Relevance		
4	12/14/1998	United States December 14, 1998, letter to the City of Galveston from the Attorney General interposing a Section 5 objection	US0000008	US0000012	Relevance		
5	3/9/2000	OMB Guidance on Aggregation and Allocation of Data on Race for Use in Civil Rights Monitoring and Enforcement	Attachment A to U.S. RFA's served March 22, 2023	N/A	Authentication; Foundation; Hearsay; Object to use of document not disclosed in response to disclosures, copy not provided until 7/14/2023;	Have provided a copy via email 7/14/2023	
6	5/1/2005	May 1, 2005 Article by J. Alford et al., <i>Are Political Orientations Genetically Transmitted?</i>	N/A	N/A	Hearsay, Relevance		Alford Ex. 3
7	8/12/2010	Beirne, Maynard & Parsons L.L.P. 2010 Statement of Qualifications	DEFS00036850	DEFS00036875	Relevance		
8	11/4/2010	Nov. 4, 2010 Email from E. Courville to S. Holmes re Temporary Appointee for JP Position, Precinct 3	NAACP00000532	NAACP00000532	Relevance		Courville Ex. 6
9	11/9/2010	Nov. 9, 2010 Email from J. Compian to S. Holmes re Follow up to our morning meeting of today	NAACP00000544	NAACP00000544	Relevance		Courville Ex. 7
10	2011	2011 Commissioner Proposal A Map	DEFS00031604	DEFS00031604			
11	2011	Commissioner Districts Total Population, VAP Breakdowns for 2011 Redistricting Proposals	DEFS00031605	DEFS00031606			
12	3/2011	Mar. 2011 Article by E. Carmines et al., <i>On the Meaning, Measurement, and Implications of Racial Resentment</i>	N/A	N/A	Hearsay		Stephens-Dougan Ex. 3
13	3/9/2011	Mar. 9, 2011 Email from K. Clark to C. Mabry re: FW: Redistricting	DEFS00009623	DEFS00009623	Relevance, foundation		
14	3/10/2011	Mar. 10, 2011 Email from S. Holmes to M. Henry re: Redistricting	DEFS00009694	DEFS00009696			
15		Withdrawn by agreement of all parties.					
16		Withdrawn by agreement of all parties.					
17	5/16/2011	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	Relevance, authentication, foundation (unsigned letter; signed copy is at DEFS00035811-816)		Henry Ex. 7

Defendants' Objections to Plaintiffs' Exhibits

PX No.	Doc Date	Description	Beg Bates	End Bates	Defendants' Objections	Plaintiffs Notes on Revisions	References
18	5/24/2011	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	DEFS00015166	DEFS00015169			Apffel Ex. 16, Henry Ex. 12; Giusti Ex. 1
19	6/2/2011	Jun. 2, 2011 Email from P. Grady to R. Lewis re June 7th agenda	US0002192	US0002202			Henry Ex. 27
20	6/7/2011	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	DEFS00015170	DEFS00015173			Sullivan Ex. 21
21	6/12/2011	Jun. 12, 2011 Email to J. Compian re: Galveston Housing Authority actions involving Harish	NAACP00001048	NAACP00001052	Relevance		Phillips Ex. 2
22	6/14/2011	Jun. 14, 2011 Email from M. Jackson to J. Compian re: Fwd: Galveston Housing Authority actions involving Harish	NAACP00000981	NAACP00000987	Relevance		Phillips Ex. 4
23	6/24/2011	Jun. 24, 2011 Email from S. Holmes to P. Doyle re: Nixon	DEFS00032393	DEFS00032394	Relevance		
24		Withdrawn by agreement of all parties.					
25	6/27/2011	Jun. 27, 2011 Email from J. Compian to L. Murrell et al. re: subject.. Where are we?	NAACP00001077	NAACP00001079			Compian Ex. 7
26	7/25/2011	Jul. 25, 2011 Summary of GCI Meeting Held July 12th	NAACP00000872	NAACP00000883	Hearsay, relevance		Compian Ex. 6
27	8/3/2011	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			
28		Withdrawn by agreement of all parties.					
29	8/3/2011	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	Relevance		
30	8/5/2011	Aug. 5, 2011 Email from S. Holmes to P. Doyle et al. re: Proposal 3, attaching Proposal 3	DEFS00005602	DEFS00005603			
31	8/5/2011	Aug. 5, 2011 Email from N. Sigler to M. Fitzgerald re: Proposals Voting Precincts, attaching proposal 1 commis vote, et al.	DEFS00007887	DEFS00007890			Sigler Ex. 22
32	8/5/2011	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			Sigler Ex. 23
33	8/5/2011	Aug. 5, 2011 Email from M. Fitzgerald to S. Holmes re: FW: Proposal 3, attaching Proposal 3	DEFS00010034	DEFS00010035			Sigler Ex. 25
34		Withdrawn by agreement of all parties.					
35	8/5/2011	Aug. 5, 2011 Email from S. Holmes to K. Clark re: FW: Proposal 3, attaching Proposal 3	DEFS00011506	DEFS00011507			Sigler Ex. 26
36		Withdrawn by agreement of all parties.					
37		Withdrawn by agreement of all parties.					
38	8/10/2011	Aug. 10, 2011 Email from P. Grady to M. Henry re: WEB POSTING FOR REDISTRICTING	DEFS00009697	DEFS00009697			Duplicate version used in Henry Ex. 10

Defendants' Objections to Plaintiffs' Exhibits

PX No.	Doc Date	Description	Beg Bates	End Bates	Defendants' Objections	Plaintiffs Notes on Revisions	References
39	8/10/2011	Aug. 10, 2011 Email from N. Sigler to M. Fitzgerald re: FW: Proposal, attaching Proposal 3 commis vote, et al.	DEFS00019401	DEFS00019406			Sigler Ex. 19
40	8/22/2011	Aug. 22, 2011 Resolution No. 1165 from the City of La Marque re: 2011 Justice of the Peace/Constable Plan	DEFS00029502	DEFS00029504	Relevance, foundation		
41	8/24/2011	Aug. 24, 2011 Email from N. Sigler to M. Fitzgerald re: Voting precinct splits, attaching Voting Precinct Splits Proposal 3 Commis, et al.	DEFS00007913	DEFS00007919			Sigler Ex. 27
42		Withdrawn by agreement of all parties.					
43		Withdrawn by agreement of all parties.					
44		Withdrawn by agreement of all parties.					
45	8/29/2011	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.	DEFS00031597	DEFS00031607			
46		Withdrawn by agreement of all parties.					
47	10/3/2011	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	US0000013	US0000016	Relevance		
48	10/7/2011	Oct. 7, 2011 Email from B. Chapman to P. Grady re: Needed information!	DEFS00009601	DEFS00009601	Relevance		Sullivan Ex. 24
49	10/21/2011	Oct. 21, 2011 Email from TJ Aulds to M. Henry re: Redistricting	DEFS00009704	DEFS00009705	Relevance		Henry Ex. 8
50	10/26/2011	Email from V. Van Horn to P. Ready et al. re: 2010 census redistricting order (October 26, 2011), attaching Redistricting Order Establishing New JP Precinct Boundaries, et al.	DEFS00029205	DEFS00029364			Apffel Ex. 3, Drummond Ex. 18, Henry Ex. 50
51	10/28/2011	Oct. 28, 2021 Block Assignment File	DEFS00018660	DEFS00018660	FRE 106 - Incomplete document (MSJ PDF Exhibit incomplete; should be submitted in native format)		Petteway Opp. to MSJ Ex. 26
52	11/22/2011	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	DEFS00010522	DEFS00010525			Apffel Ex. 1
53		Withdrawn by agreement of all parties.					
54	1/17/2012	Jan. 17, 2012 Email from P. Toliver to A. Rubio et al. re: Meeting tonight. Galveston County Coalition for Justice	NAACP00001472	NAACP00001472			Phillips Ex. 12
55	3/6/2012	Mar. 6, 2012 Email from D. Sullivan to B. Sargent re: DOJ Says NO to Galveston Redistricting	DEFS00010474	DEFS00010474			Sullivan Ex. 23
56	3/10/2012	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			Courville Ex. 10

Defendants' Objections to Plaintiffs' Exhibits

PX No.	Doc Date	Description	Beg Bates	End Bates	Defendants' Objections	Plaintiffs Notes on Revisions	References
57	3/12/2012	Mar. 12, 2012 Email from S. Holmes to S. Holmes re FW: Proposal 3, attaching Proposal 3	DEFS00016204	DEFS00016205			
58		Withdrawn by agreement of all parties.					
59	3/15/2012	Mar. 15, 2012 Email from M. Fitzgerald to M. Henry et al. re: FW: Commissioner Precincts, attaching Commissioners Proposal (Discussions Only)	DEFS00011520	DEFS00011521	Inadmissible under FRE 408 as a settlement negotiation; incomplete document		Sigler Ex. 31
60	3/15/2012	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	US0001165	US0001168	Relevance, hearsay		
61	3/20/2012	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	DEFS00020536	DEFS00020538	Inadmissible under FRE 408 as a settlement negotiation; incomplete document		Sullivan Ex. 25, Sullivan Ex. 26
62	4/5/2012	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	Hearsay		
63	2/1/2013	Feb. 1, 2013 Email from S. Holmes to M. Henry re: Revised	DEFS00029429	DEFS00029429			Henry Ex. 3
64	2/5/2013	Feb. 5, 2013 Email from D. Allen to C. Johnson et al. re: Commissioners Court Update for 2013-2014 Redistricting Plans	DEFS00016466	DEFS00016466			Sullivan Ex. 28
65	8/21/2013	Aug. 21, 2013 Email from R. Dennard to T. Drummond re: Chronicle article today	DEFS00029119	DEFS00029121	Relevance, Hearsay (news article in body of email)		Drummond Ex. 33
66	12/30/2013	Dec. 30, 2013 Transcript of Oral Deposition of Judge Mark Henry	N/A	N/A	Improper designation of entire deposition transcript as documentary evidence; entire transcript is not evidence and contains inadmissible testimony and attorney discussion		Henry Ex. 2
67	1/16/2014	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	Improper designation of entire transcript as documentary evidence; entire transcript is not evidence and not all portions are relevant		Drummond Ex. 35
68	5/20/2014	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	Relevance; Hearsay		Giusti Ex. 17, Ex. 18

Defendants' Objections to Plaintiffs' Exhibits

PX No.	Doc Date	Description	Beg Bates	End Bates	Defendants' Objections	Plaintiffs Notes on Revisions	References
69	5/30/2014	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	Hearsay		
70	6/4/2014	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	Hearsay		
71	8/12/2014	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	Hearsay		
72	11/4/2014	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			NAACP Opp. to MSJ Ex. 23
73	8/21/2015	Aug. 21, 2015 D. Apffel Tweet re: Oath Keepers	N/A	N/A	Relevance; hearsay; authentication; FRE 403		Apffel Ex. 29
74	8/31/2015	Aug. 31, 2015 D. Apffel Tweet re: Houston Chronicle article	N/A	N/A	Relevance; hearsay; authentication		Apffel Ex. 30
75	11/12/2015	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	Hearsay		Courville Ex. 4
76	1/24/2016	Jan. 24, 2016 D. Apffel Facebook post	N/A	N/A	Relevance		Apffel Ex. 6
77	3/17/2016	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	Hearsay		Barreto Ex. 4
78	8/16/2017	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	Hearsay		
79	1/8/2018	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	Hearsay		Johnson Ex. 16

Defendants' Objections to Plaintiffs' Exhibits

PX No.	Doc Date	Description	Beg Bates	End Bates	Defendants' Objections	Plaintiffs Notes on Revisions	References
80	4/3/2018	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	Relevance; hearsay; authentication; not disclosed prior to exchange of exhibit list; improper format for record	Working Link Provided in Description	Armstrong Ex. 1
81	4/16/2018	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	Hearsay		
82	7/16/2018	Jul. 16, 2018 Letter from Allison, Bass & Magee, L.L.P. to Hon. Mark Henry re: Commissioners Court Precinct Redistricting	DEFS00029919	DEFS00029931	Relevance		
83	7/23/2018	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	DEFS00011855	DEFS00011868	Relevance		Martinez Ex. 16
84	7/23/2018	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	DEFS00029122	DEFS00029136	Relevance		Drummond Ex. 4
85	10/18/2018	Oct. 18, 2018 Email to M. Shannon re: FW: PSAP Workshop #2 Summary	DEFS00019470	DEFS00019471	Relevance		Shannon Ex. 1, Sigler Ex. 32
86	2/4/2019	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	Hearsay		Sullivan Ex. 17
87	5/15/2019	May 15, 2019 Email to M. Shannon re: CENSUS TAB BLOCKS & POPULATION DATA	DEFS00019474	DEFS00019475			Sigler Ex. 4
88	5/16/2019	May 16, 2019 Email from B. Andrews to N. Sigler re: 2020 PSAP External Participant Final Data Upload for Galveston County	DEFS00019478	DEFS00019480	Relevance		Sigler Ex. 33
89	10/8/2019	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	Relevance		Courville Ex. 11
90	10/25/2019	Oct. 25, 2019 Email to D. Sullivan, attaching Election Day Locations (revised) et al.	DEFS00008042	DEFS00008044			Sullivan Ex. 13
91	11/14/2019	Nov. 14, 2019 Email to R. Brezik et al. re: Workshop for Geography and Census Data, attaching Galveston County powerpoint	DEFS00004571	DEFS00004572	Relevance; hearsay; authentication; foundation		Sullivan Ex. 22

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PX No.	Doc Date	Description	Beg Bates	End Bates	Defendants' Objections	Plaintiffs Notes on Revisions	References
92	12/7/2019	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	Hearsay		Armstrong Ex. 8, Stephens-Dougan Ex. 10
93		Withdrawn by agreement of all parties.					
94		Withdrawn by agreement of all parties.			Hearsay		
95	1/29/2020	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	DEFS00028117	DEFS00028119			Apffel Ex. 9
96		Withdrawn by agreement of all parties.					
97	1/31/2020	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	DEFS00028124, DEFS00029962	DEFS00029963	Relevance; authentication		Martinez Ex. 17
98	2/6/2020	Feb. 6, 2020 Letter from Allison, Bass & Magee, L.L.P. to Hon. Mark Henry re Commissioners Court Precinct Redistricting	DEFS00029966	DEFS00029979	Relevance		
99	2/18/2020	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	DEFS00029137	DEFS00029151	Relevance; incomplete document		Henry Ex. 16, Apffel Ex. 8
100	2/18/2020	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	DEFS00029430, DEFS00029434	DEFS00029447	Relevance		
101	2/21/2020	Feb. 21, 2020 C. Johnson Tweet	DEFS00031247	DEFS00031247			Stephens-Dougan Ex. 7, Johnson Ex. 13
102	2/22/2020	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	Hearsay		Johnson Ex. 15
103		Withdrawn by agreement of all parties.					
104	2/23/2020	Feb. 23, 2020 C. Johnson Tweet	DEFS00031248	DEFS00031248			Stephens-Dougan Ex. 8, Johnson Ex. 14
105	3/11/2020	Mar. 11, 2020 Email from K. Saludis to N. Sigler re: link	DEFS00010340	DEFS00010341			Sigler Ex. 2
106	3/27/2020	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	Relevance; hearsay		Stephens-Dougan Ex. 6

Defendants' Objections to Plaintiffs' Exhibits

PX No.	Doc Date	Description	Beg Bates	End Bates	Defendants' Objections	Plaintiffs Notes on Revisions	References
107	4/10/2020	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	Hearsay		Armstrong Ex. 14
108	6/21/2020	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	Hearsay; Authentication; Reliability/FRE 703		Cooper Ex. 4
109	6/29/2020	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	Hearsay		Compian Ex. 5
110	7/1/2020	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	Hearsay		Courville Ex. 12
111	7/17/2020	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	Hearsay		
112	8/24/2020	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	Hearsay		
113	9/23/2020	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	Hearsay		Armstrong Ex. 7
114	10/12/2020	Oct. 12, 2020 Email from M. Shannon to K. Clark re: FW: voting precincts, attaching Voting Precincts Breakdown	DEFS00003873	DEFS00003874			Shannon Ex. 4
115	10/12/2020	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	Hearsay		

Defendants' Objections to Plaintiffs' Exhibits

PX No.	Doc Date	Description	Beg Bates	End Bates	Defendants' Objections	Plaintiffs Notes on Revisions	References
116	11/3/2020	Nov. 3, 2020 Email from D. Sullivan to M. Henry re: Election Night Reporting Results, attaching summary_Galveston	DEFS00003900	DEFS00003901			Henry Ex. 5, Sullivan Ex. 30
117	11/7/2020	Part A 1 November 2020, Galveston County Election Results (spreadsheet)	DEFS00002605	DEFS00002605			US Opp. to MSJ Ex. 23
118	11/20/2020	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	Hearsay		Sullivan Ex. 10
119	12/4/2020	Dec. 4, 2020 Article by C. Karpowitz et al., <i>What Leads Racially Resentful Voters to Choose Black Candidates?</i>	N/A	N/A	Hearsay		Stephens-Dougan Ex. 4
120	12/12/2020	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	Hearsay		
121	12/15/2020	Dec. 16, 2020 Calendar Invite from P. Ready to D. Oldham et al re Galveston County redistricting	DEFS00018648	DEFS00018648			
122		Withdrawn by agreement of all parties.					
123	12/16/2020	Dec. 16, 2020 Calendar Invite from P. Ready to D. Oldham et al re Galveston County redistricting	DEFS00029155	DEFS00029156			Martinez Ex. 7
124	12/16/2020	Dec. 16, 2020 Email from D. Oldham to P. Rady re: Galveston County, Texas proposed engagement - 2020 census redistricting	DEFS00030098	DEFS00030100			
125	12/30/2020	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	DEFS00003910	DEFS00003911			Henry Ex. 14
126		Withdrawn by agreement of all parties.					
127	1/14/2021	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	DEFS00004160	DEFS00004162	Relevance		Apffel Ex. 7, Johnson Ex. 2; Other version used in Drummond Ex. 5 and Henry Ex. 15
128		Withdrawn by agreement of all parties.					
129	01/25/2021 - 11/12/2021	Jan. 25, 2021 through Nov. 12, 2021 minutes, agendas, and video recordings of the Galveston County Commissioners Court	US0000022	US0001094	Relevance		
130	2/1/2021	Feb. 1, 2021 Email from N. Sigler to M. Shannon re: block group counts, attaching African American - Black Count et al.	DEFS00030080	DEFS00030083			Shannon Ex. 5
131		Withdrawn by agreement of all parties.					

Defendants' Objections to Plaintiffs' Exhibits

PX No.	Doc Date	Description	Beg Bates	End Bates	Defendants' Objections	Plaintiffs Notes on Revisions	References
132	2/1/2021	Feb. 1, 2021 Email from M. Shannon to S. Holmes re: FW: block group counts, attaching African American - Black Count et al.	DEFS00030084	DEFS00030087			Holmes Ex. 2, Shannon Ex. 6
133		Withdrawn by agreement of all parties.					
134	2/3/2021	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	Hearsay		Stephens-Dougan Ex. 5
135	2/22/2021	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)	DEFS00019519	DEFS00019520	FRE 106 - Incomplete document, need attachments	Attachments at DEFS00019521-19970 are 200+page canvass reports that Plaintiffs wish to omit due to volume	Sullivan Ex. 33
136	3/14/2021	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	Hearsay		Shannon Ex. 10
137	3/30/2021	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_e_16e0386a-3a73-55eb-a2de-b9f07a3debba.html	N/A	N/A	Hearsay		Courville Ex. 14
138	4/1/2021	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	DEFS00029190	DEFS00029195			Martinez Ex. 12
139	4/5/2021	Apr. 5, 2021 Email from B. Chapman to D. Martinez re: Commissioners Court 4/5/21, attaching agenda items 11 and 13	DEFS00028049	DEFS00028064	Relevance (DEFS00028055-00028064 not relevant)		Martinez Ex. 5
140	4/5/2021	Transcription of portion of Apr. 5, 2021 Galveston County Commissioners Court Meeting	N/A	N/A	Object to use of document not produced until pretrial exchanges; Authentication; errors in transcription	Copy provided via email on 7/13/2023	
141	4/7/2021	Apr. 7, 2021 Email from Z. Davidson to T. Drummond re: FW: Oldham/redistricting retention letter	DEFS00028183	DEFS00028184	Relevance; FRE 403		Drummond Ex. 9
142		Withdrawn by agreement of all parties.					
143	4/8/2021	Apr. 8, 2021 Email from N. Sigler to C. Johnson et al. re: old commissioner precinct maps	DEFS00004169	DEFS00004171			Johnson Ex. 3, Shannon Ex. 14
144	4/21/2021	Apr. 21, 2021 Email from P. Ready to D. Oldham re: Ps vs Commissioners redistricting question - Galveston County	DEFS00018653	DEFS00018654	Hearsay		Henry Ex. 48
145		Withdrawn by agreement of all parties.					
146	4/30/2021	Screenshot of Apr. 30, 2021 Website, Dr. Armstrong in the News Posted by Robin Armstrong	N/A	N/A	Hearsay, relevance		Armstrong Ex. 13

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PX No.	Doc Date	Description	Beg Bates	End Bates	Defendants' Objections	Plaintiffs Notes on Revisions	References
147		Withdrawn by agreement of all parties.					
148		Withdrawn by agreement of all parties.					
149	5/20/2021	May 20, 2021 Email from R. Eldridge to C. Johnson re: Redistricting Information	DEFS00004181	DEFS00004183			Johnson Ex. 6; Shorter version used in Drummond Ex. 12
150	5/20/2021	May 20, 2021 Email From P. Ready to T. Drummond re: Asked and Answered!	DEFS00033507	DEFS00033509	Hearsay		Drummond Ex. 11, Henry Ex. 22, Johnson Ex. 5
151	6/30/2021	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	Hearsay		
152	7/2/2021	Jul. 2, 2021 Email from N. Sigler to N. Baher re: DRAFT, attaching nancy wall DRAFT	DEFS00020435	DEFS00020436	Relevance		Shannon Ex. 15
153	7/2/2021	Jul. 2, 2021 Email from N. Sigler to N. Stelly re: DRAFTS, attaching N COUNTY COMMISSIONER 24X36 et al.	DEFS00020432	DEFS00020434	Relevance		Sigler Ex. 14
154	7/12/2021	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	Hearsay		Sigler Ex. 34, Sullivan Ex. 6
155		Withdrawn by agreement of all parties.					
156	8/4/2021	Aug. 4, 2021 Email from B. Williams to M. Henry re: Redistricting	DEFS00029474	DEFS00029474			(Shorter version used in Henry Ex. 26)
157	8/4/2021	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	Hearsay		Krochmal Ex. 9
158	8/12/2021	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	Hearsay		Sigler Ex. 35
159	8/13/2021	Aug. 13, 2021 Email from C. Johnson to K. Saludis et al re: Please, attaching Galveston County Commissioner Precinct Voters	DEFS00016679	DEFS00016680			Johnson Ex. 4
160	8/24/2021	Aug. 24, 2021 Email from C. Johnson to Commissioners re: Current Voter Count by Precinct, attaching Galveston County Voters by Precinct August 2021	DEFS00003808	DEFS00003809		On Proposed Joint Exhibit List	Apffel Ex. 10, Drummond Ex. 15, Henry Ex. 24, Johnson Ex. 7
161	8/27/2021	Aug. 27, 2021 Email from S. Collins to D. Apffel re: Fw: Voter Registration, attaching 2020 Voter Registration et al.	DEFS00011026	DEFS00011028			Apffel Ex. 11
162	8/27/2021	Aug. 27, 2021 Email from K. Hart to C. Johnson et al. re: Gearing Up for Redistricting!	DEFS00016695	DEFS00016697	Relevance		Johnson Ex. 11

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PX No.	Doc Date	Description	Beg Bates	End Bates	Defendants' Objections	Plaintiffs Notes on Revisions	References
163		Withdrawn by agreement of all parties.					
164		Withdrawn by agreement of all parties.					
165	8/31/2021	Aug. 31, 2021 Email from L. Liechty to D. Oldham re: Call Request - Galveston County Redistricting	DEFS00029750	DEFS00029751			
166		Withdrawn by agreement of all parties.					
167	8/31/2021	Aug. 31, 2021 Email from P. Ready to L. Liechty re: Call Request - Galveston County Redistricting	DEFS00029763	DEFS00029767			
168	9/1/2021	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	Relevance, Foundation, Authentication, Not provided prior to exhibit list exchange, hearsay, attempt to provide legal opinion as evidence	We have provided an updated working link and have provided via email as well	https://www.justice.gov/d9/case-documents/attachments/2021/09/01/guidance-redistricting-9-1-21-edited_508_002.pdf
169		Withdrawn by agreement of all parties.					
170		Withdrawn by agreement of all parties.					
171		Withdrawn by agreement of all parties.					
172		Withdrawn by agreement of all parties.					
173	9/14/2021	Sept. 14, 2021 Email from A. Kincaid to D. Oldham re: Galveston report, attaching TX_GalvestonCountyCommission-DemoShifts-2021 et al.	DEFS00030111	DEFS00030115			Henry Ex. 21, NAACP Opp. to MSJ Ex. 18
174		Withdrawn by agreement of all parties.					
175		Withdrawn by agreement of all parties.					
176		Withdrawn by agreement of all parties.					
177	9/20/2021	Sept. 20, 2021 Email from P. Ready to S. Holmes re: 2020 Census Data, attaching TX_GalvestonCountyCommission-DemoShifts-9-20-2021	DEFS00030116	DEFS00030117			
178		Withdrawn by agreement of all parties.					
179		Withdrawn by agreement of all parties.					
180	9/22/2021	Sept. 22, 2021 Email from S. Holmes to L. Liechty re: 2nd Call w/ Paul Ready & Dale Oldham	DEFS00029833	DEFS00029833			Holmes Ex. 5
181	9/23/2021	Sept. 23, 2021 Email from N. Sigler to <i>Redacted</i> re: List for Commissioner Holmes	DEFS00004607	DEFS00004607			Shannon Ex. 7, Sigler Ex. 36
182		Withdrawn by agreement of all parties.					
183	9/23/2021	Sept. 23, 2021 Email from D. Sullivan to C. Johnson re: Continuing our work	DEFS00013502	DEFS00013505			Johnson Ex. 8, Sullivan Ex. 19
184	9/23/2021	Sept. 23, 2021 Calendar Invite from L. Liechty for Conf. Call w/Holmes and Oldham re: Redistricting	DEFS00029840	DEFS00029840			Holmes Ex. 6
185	9/27/2021	Sept. 27, 2021 Email from N. Sigler to M. Shannon re: Commissioner Holmes project	DEFS00004608	DEFS00004609			Shannon Ex. 8
186	9/27/2021	Sept. 27, 2021 Email from N. Sigler to M. Shannon re Commissioner Holmes project	DEFS00010412	DEFS00010412			Shannon Ex. 9, Sigler Ex. 37

Defendants' Objections to Plaintiffs' Exhibits

PX No.	Doc Date	Description	Beg Bates	End Bates	Defendants' Objections	Plaintiffs Notes on Revisions	References
187	10/14/2021-10/26/2021	Oct. 14, 2021 through Oct. 26, 2021 Text Messages between T. Bryan and P. Gordon	DEFS00031806	DEFS00031807			T. Bryan Dep. Ex. 14
188	10/15/2021	Oct. 15, 2021 Email from T. Bryan to J. Torchinsky et al. re: Galveston	DEFS00011236	DEFS00011237			
189	10/15/2021	Oct. 15, 2021 Email from P. Gordon to J. Torchinsky et al. re: Galveston	DEFS00030120	DEFS00030120			
190	10/15/2021	Thomas Bryan, Spreadsheet "Pop Pivot" Tab, Containing Racial Data and Composition of Census Blocks (October 15, 2021)	DEFS00031696	DEFS00031696	FRE 106 incomplete document, complete Excel spreadsheet should be submitted		T. Bryan Dep. Ex. 4; Petteway Opp. to MSJ Ex. 36 (excerpt), Petteway Opp. to MSJ Ex. 40 (excerpt)
191	10/15/2021	Oct. 15, 2021 Email from P. Gordon to T. Bryan re: Galveston	DEFS00036191	DEFS00036193			Petteway Opp. to MSJ Ex. 24, T. Bryan Dep. Ex. 2
192		Withdrawn by agreement of all parties.					
193	10/16/2021	Oct. 16, 2021 Email from T. Bryan to J. Torchinsky et al. re: Call on Galveston, 11AM EDT Sunday Oct 17	DEFS00027855	DEFS00027855			
194	10/16/2021	Oct. 16, 2021 Email from P. Gordon to T. Bryan re: Galveston	DEFS00027875	DEFS00027877			
195	10/16/2021	Oct. 16, 2021 Email from J. Torchinsky to T. Bryan et al. re: Galveston	DEFS00027878	DEFS00027880			
196	10/17/2021	Oct. 17, 2021 Email from T. Bryan to D. Oldham re: Galveston	DEFS00011241	DEFS00011244			
197	10/17/2021	Oct. 17, 2021 Email from T. Bryan to D. Oldham et al. re: Galveston, attaching Galveston_Analysis 10_17_21 et al.	DEFS00036194	DEFS00036200			NAACP Opp. to MSJ Ex. 20
198		Withdrawn by agreement of all parties.					
199	10/18/2021	Oct. 18, 2021 Calendar Invite from M. Henry re: HOLD Redistricting (per Tyler)	DEFS00029477	DEFS00029477			
200	10/19/2021	Oct. 19, 2021 Email from D. Apffel to B. Reyes re: Courthouse Security Committee	DEFS00011032	DEFS00011033			Apffel Ex. 14, Giusti Ex. 2
201	10/19/2021	Oct. 19, 2021 Galveston Texas Optimal Geo Plan	DEFS00036819	DEFS00036820			
202	10/19/2021	Oct. 19, 2021 Calendar Invite from M. Henry re HOLD Redistricting (per Tyler)	DEFS00016142	DEFS00016142			
203	10/21/2021	Oct. 21, 2021 Email from T. Bryan to D. Oldham re: Zoom	DEFS00011247	DEFS00011247			
204	10/21/2021	Oct. 21, 2021 Email from T. Bryan to D. Oldham et al. re: Take 2	DEFS00011248	DEFS00011248			
205	10/21/2021	Oct. 21, 2021 Email from T. Bryan to D. Oldham re: New data and maps, attaching "Galveston_Analysis 10_22_21.xls"	DEFS00011249	DEFS00011252			

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PX No.	Doc Date	Description	Beg Bates	End Bates	Defendants' Objections	Plaintiffs Notes on Revisions	References
206	10/21/2021	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	Hearsay		Sullivan Ex. 18
207	10/22/2021	Oct. 22, 2021 Email from C. Johnson to T. Drummond re: Voters in County by Precinct, attaching Galveston County Voters by Precinct August 2021	DEFS00004208	DEFS00004209			Johnson Ex. 9
208	10/22/2021	Email from T. Bryan to D. Oldham re: Revised 10_22, attaching "Galveston_Analysis 10_22_21.xls"	DEFS00011253	DEFS00011254			
209	10/22/2021	Oct. 22, 2021 Email from T. Bryan to D. Oldham re: Please use this 10-22 file (attachment is PX 210)	DEFS00036211	DEFS00036211			
210	10/22/2021	Oct. 22, 2021 file sent from T. Bryan to D. Oldham titled "Galveston_Analysis 10_22_21.xls"	DEFS00036212	DEFS00036212	FRE 106 - Incomplete document; DX 264 is complete native version		NAACP Opp. to MSJ Ex. 17
211	10/22/2021	Oct. 22, 2021 Email from T. Bryan to P. Gordon re: Fw: Fwd: Current Voter Count by Precinct	DEFS00036214- DEFS00036215, DEFS00032766				T. Bryan Dep. Ex. 13
212	10/25/2021	Oct. 25, 2021 Email from N. Sigler to M. Shannon re: Holmes project, attaching Commissioner Holmes Project et al.	DEFS00010405	DEFS00010412			Shannon Ex. 11, Sigler Ex. 38
213	10/25/2021	Oct. 25, 2021 Email from T. Drummond to P. Ready re: PIA	DEFS00029182	DEFS00029204			Drummond Ex. 34
214	10/26/2021	Oct. 26, 2021 Email from N. Sigler to C. Johnson re: KUDOS	DEFS00008053	DEFS00008055			Johnson Ex. 23, Sigler Ex. 39
215	10/26/2021	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.	DEFS00011258	DEFS00011263			Drummond Ex. 24
216	10/26/2021	Oct. 26, 2021 Email from T. Bryan to P. Gordon et al. re: Galveston Work Products, attaching map 1 Precinct Split Inventory et al.	DEFS00011264	DEFS00011288			
217	10/26/2021	Oct. 26, 2021 VTD Data Excel	DEFS00011898				Sigler Ex. 12
218	10/26/2021	Oct. 26, 2021 Inventory of Galveston precinct splits for Map 1	DEFS00027920	DEFS00027929			
219	10/26/2021	Oct. 26, 2021 Inventory of Galveston precinct splits for Map 2	DEFS00027905	DEFS00027919			
220	10/26/2021	Oct. 26, 2021 Email from T. Bryan to P. Gordon re: Galveston Work Products	DEFS00027959	DEFS00027960	FRE 106 Incomplete document, lacks attachments through DEFS00027972		
221		Withdrawn by agreement of all parties.					
222	10/26/2021	Oct. 26, 2021 Email from P. Gordon to T. Bryan re: Galveston Work Products	DEFS00036223	DEFS00036223			
223	10/26/2021	Oct. 26, 2021 Email from P. Gordon to T. Bryan re: Re: Galveston Work Products, attaching Galveston - Map 1 Precinct Inventory - 10_26_21	DEFS00036224 DEFS00032767	DEFS00036226 DEFS00032775			

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PX No.	Doc Date	Description	Beg Bates	End Bates	Defendants' Objections	Plaintiffs Notes on Revisions	References
224	10/28/2021	"10.28 Galveston Analysis" Spreadsheet sent from D. Oldham to N. Sigler	DEFS00018660	DEFS00018660			
225	10/28/2021	Galveston_Analysis 10_28_21.xlsx	DEFS00028020	DEFS00028020			
226	10/28/2021	"Galveston Analysis 10.28.21" Spreadsheet sent by K. Clark to K. Schafler	DEFS00028148	DEFS00028148			
227	10/28/2021	Oct. 28, 2021 Email from T. Bryan to P. Gordon et al. re: modified inventory, attaching Galveston Map 2 Precincts 10_28 et al.	DEFS00036233, DEFS00033514- DEFS00033518				T. Bryan Dep.Ex. 16
228		Withdrawn by agreement of all parties.					
229	10/29/2021	Oct. 29, 2021 Email from Z. Davidson to T. Drummond re: Public Comment Webpage, attaching Public Comment Page on Website	DEFS00003891	DEFS00003892			Drummond Ex. 19
230	10/29/2021	Oct. 29, 2021 Email from N. Sigler to M. Shannon re: redistricting maps	DEFS00004614	DEFS00004614			Shannon Ex. 2
231	10/29/2021	Oct. 29, 2021 VTD Data Excel (with Pop Pivot tab)	DEFS00011286	DEFS00011286			Apffel Ex. 27-A
232	10/29/2021	Oct. 29, 2021 Email from P. Ready to T. Drummond re: Fwd: modified inventory, attaching Galveston Map 2 Precincts 10_28 et al.	DEFS00011887	DEFS00011892			Drummond Ex. 20, Henry Ex. 29
233	10/29/2021	Excel VTD data from "Galveston_Analysis 10-28-21.xls"	DEFS00011892	DEFS00011892			Henry Ex. 30
234	10/29/2021	Oct. 29, 2021 Email from P. Ready to T. Drummond re: Map 1 and Map 2 Boundary Files	DEFS00011893	DEFS00011893			Drummond Ex. 21
235		Withdrawn by agreement of all parties.					
236	10/29/2021	Oct. 29, 2021 Galveston Texas Map 2 with Precincts	DEFS00011896	DEFS00011896			Henry Ex. 43
237		Withdrawn by agreement of all parties.					
238	10/29/2021	Oct. 29, 2021 Email from M. Henry to M. Henry re Screenshot 2021-10-29	DEFS00016153	DEFS00016156			Henry Ex. 37
239	10/29/2021	Oct. 29, 2021 Letter to Hon. Mark Henry and Commissioners from The League of Woman Voters of the Bay Area	DEFS00016269	DEFS00016273			Giusti Ex. 14
240		Withdrawn by agreement of all parties.					
241	10/29/2021	Oct. 29, 2021 Email from D. Oldham to T. Bryan re: Fwd: Missing files for map 1, attaching map 2 files et al.	DEFS00028021	DEFS00028023			Drummond Ex. 22
242	10/29/2021	Oct. 29, 2021 Email from N. Sigler to Z. Davidson re: FW: modified inventory, attaching Galveston Map 2 Precincts 10_28 et al.	DEFS00028192	DEFS00028197			Drummond Ex. 23
243		Withdrawn by agreement of all parties.					
244	10/29/2021	Oct. 29, 2021 Email from T. Bryan to D. Oldham re: Fwd: Missing files for map 1	DEFS00030132	DEFS00030133			
245	10/30/2021	Oct. 29, 2021 Email from K. Otten to D. Apffel re: Discussion on some CLS Concerns	DEFS00011040	DEFS00011041			Apffel Ex. 17
246		Withdrawn by agreement of all parties.					
247	10/31/2021	Joe Giusti Oct. 31, 2021 Facebook Posts	N/A	N/A			Giusti Ex. 7
248	11/1/2021	Nov. 1, 2021 Email from D. Apffel to B. Flanagan re: Redistricting	DEFS00003811	DEFS00003811			Apffel Ex. 20
249		Withdrawn by agreement of all parties.					

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PX No.	Doc Date	Description	Beg Bates	End Bates	Defendants' Objections	Plaintiffs Notes on Revisions	References
250	11/2/2021	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	DEFS00029374	DEFS00011479			Henry Ex. 35
251		Withdrawn by agreement of all parties.					
252	11/2/2021	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	DEFS00030284	DEFS00030285			Drummond Ex. 29
253	11/2/2021	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	DEFS00031229	DEFS00031234			
254		Withdrawn by agreement of all parties.					
255		Withdrawn by agreement of all parties.					
256	11/3/2021	Nov. 3, 2021 Email Restricted to P. McLarty et al. re: Redistricting Scheduling	DEFS00007866	DEFS00007868			Johnson Ex. 10, Sigler Ex. 40
257		Withdrawn by agreement of all parties.					
258	11/3/2021	Nov. 3, 2021 Email from L. Liechty to D. Martinez et al. re: Redistributing	DEFS00029849	DEFS00029850			
259	11/4/2021	Nov. 4, 2021 Email from T. Drummond to J. Ferguson re: Redistricting Data	DEFS00011903	DEFS00011904			Drummond Ex. 32
260	11/4/2021	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	DEFS00016268	DEFS00016273			Drummond Ex. 38
261		Withdrawn by agreement of all parties.					
262	11/5/2021	Nov. 5, 2021 Email from D. Martinez to T. Drummond re: Special Meeting DRAFT, attaching TD DRAFT 11-9-21	DEFS00011913	DEFS00011915			Drummond Ex. 30
263		Withdrawn by agreement of all parties.					
264	11/5/2021	Nov. 5, 2021 Email from M. Shannon to N. Sigler re: map 2, attaching M&B map 2 258 A et al.	DEFS00020443	DEFS00020452			Shannon Ex. 12, Sigler Ex. 9
265	11/7/2021	Nov. 7, 2021 Email from L. Phillips to L. Arceneaux et al. re: Fw: Redistricting Maps	Holmes 001347	Holmes 001348			Holmes Ex. 16
266	11/9/2021	Nov. 9, 2021 Email from D. Martinez to T. Drummond re: FW: map 1, attaching Map 1 Commissioner Precincts 24x36	DEFS00003916	DEFS00003918			Martinez Ex. 11
267	11/9/2021	Nov. 9, 2021 Email from N. Sigler to D. Martinez re: map 1, attaching Map 1 Commissioner Precincts 24x36	DEFS00004331	DEFS00004332			Sigler Ex. 16
268	11/9/2021	Nov. 9, 2021 Email from N. Sigler to D. Martinez re: map 2, attaching Map 2 Commissioner Precincts 24x36	DEFS00004333	DEFS00004334			Sigler Ex. 17

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PX No.	Doc Date	Description	Beg Bates	End Bates	Defendants' Objections	Plaintiffs Notes on Revisions	References
269		Withdrawn by agreement of all parties.					
270	11/9/2021	Nov. 9, 2021 Email from C. Johnson to K. Saludis re: Legislation Statuses & Redistricting	DEFS00016726	DEFS00016726			Johnson Ex. 12
271		Withdrawn by agreement of all parties.					
272		Withdrawn by agreement of all parties.					
273	11/9/2021	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	Hearsay		Courville Ex. 16
274	11/10/2021	Nov. 10, 2021 Email from D. Apffel to L. Clift et al. re: redistricting maps	DEFS00003812	DEFS00003812			Apffel Ex. 23
275	11/10/2021	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	DEFS00011042	DEFS00011047			Apffel Ex. 22, Giusti Ex. 11
276	11/10/2021	Nov. 10, 2021 Email from C. Johnson to K. Saludi re: Legislation Statuses & Redistricting	DEFS00016731	DEFS00016732			Johnson Ex. 17
277	11/10/2021	Nov. 10, 2021 Email from J. West to D. Martinez re: Commissioners Court Special Meeting Agenda - November 12th	DEFS00018619	DEFS00018621			Martinez Ex. 15
278	11/10/2021	Nov. 10, 2021 Email Invite from C. Dunn to S. Holmes re Commissioner Holmes/Galveston County	Holmes 000323	Holmes 000346	Pages Holmes 323-24, 344, 346 contain hearsay and previously undisclosed expert analysis		Petteway Opp. to MSJ Ex. 33
279	11/10/2021	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	Hearsay		Giusti Ex. 5
280	11/10/2021	Anti-Defamation League Article, <i>The Oath Keepers: Anti-Government Extremists Recruiting Military and Police</i>	N/A	N/A	Relevance, Hearsay; FRE 403		Giusti Ex. 22
281	11/12/2021	Nov. 12, 2021 Email from Galveston County Copier to B. Chapman re" Message from KM_C550i	DEFS00011470	DEFS00011473			Apffel Ex. 25
282	11/12/2021	Nov. 12, 2021 Email from A. Watson to B. Chapman re: Commissioner Holmes, attaching Commissioner Holmes Clerk Copy et al.	DEFS00011474	DEFS00011479			Holmes Ex. 9
283		Withdrawn by agreement of all parties.					
284	11/12/2021	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.	DEFS00020457	DEFS00020461			Johnson Ex. 18
285		Withdrawn by agreement of all parties.					
286	11/12/2021	Nov. 12, 2021 People Not Politics post	N/A	N/A	Relevance, authentication		Owens Ex. 7
287	11/15/2021	Nov. 15, 2021 Email from C. Johnson to P. McLarty re Update Again!	DEFS00004232	DEFS00004235			Johnson Ex. 22

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PX No.	Doc Date	Description	Beg Bates	End Bates	Defendants' Objections	Plaintiffs Notes on Revisions	References
288	11/15/2021	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	DEFS00016754	DEFS00016755			Johnson Ex. 19, Sigler Ex. 6
289	11/16/2021	Nov. 16, 2021 Zoom meeting invite from N. Sigler to K. Clark et al. re: FW: Redistricting 2021	DEFS00027757	DEFS00027757			Apffel Ex. 32
290	11/17/2021	Nov. 17, 2021 Email from N. Sigler to D. Oldham et al. re: Revised Voting Precincts, attaching Voting Precincts 2021.zip	DEFS00030304	DEFS00030311			
291	11/30/2021	Nov. 30, 2021 Email from Restricted to P. Ready re: Fwd: Re: Galveston County redistricting numbers	DEFS00028151	DEFS00028152			
292	11/30/2021	Nov. 30, 2021 Email from P. Ready to K. Clark re: Galveston County redistricting numbers	DEFS00036262	DEFS00036263			
293	12/6/2021	Dec. 6, 2021 Email from Galveston County from J. Giusti as Chronicle writer reaching out for comment or statement	DEFS00015163	DEFS00015163			Giusti Ex. 15
294	12/7/2021	Dec. 7, 2021 Crystal Beach Local News Article, <i>Apffel introduces Joe Giusti as new Commissioner</i>	N/A	N/A	Hearsay		Giusti Ex. 12
295	12/10/2021	Dec. 10, 2021 Email from N. Sigler to H. Fortenberry re: Maproom Revisions, attaching Proposed Voting Precincts 11x17 et al.	DEFS00011749	DEFS00011753			Sigler Ex. 18
296	12/10/2021	Dec. 10, 2021 Email from D. Martinez to M. Henry re: DRAFT 12-14-21, attaching DRAFT 12-14-21 et al.	DEFS00011921	DEFS00011924			Martinez Ex. 1
297	12/10/2021	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	DEFS00030323	DEFS00030324			Drummond Ex. 2
298	12/14/2021	Dec. 14, 2021 Email from N. Sigler to D. Sullivan re: Online maps	DEFS00004657	DEFS00004657			Sullivan Ex. 29
299	12/17/2021	Dec. 17, 2021 Email from T. Bryan to P. Gordon et al. re: Galveston Invoice, attaching Thomas Bryan Galveston Redistricting Invoice 12_17	DEFS00031121	DEFS00031123			T. Bryan Dep. Ex. 1
300	1/1/2022	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	Relevance, hearsay		Armstrong Ex. 5
301	1/19/2022	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	Hearsay		Barreto Ex. 11
302	2/9/2022	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	Hearsay		Armstrong Ex. 16
303	2/11/2022	Feb. 11, 2022 Email from N. Sigler to D. Sullivan re: Commissioner Precinct maps	DEFS00005271	DEFS00005271			Sullivan Ex. 8

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304	2/16/2022	Feb. 16, 2022 Email from N. Sigler to C. Elam re: GIS Shapelile request for voting precincts	DEFS00020516	DEFS00020516			Sigler Ex. 41, Sullivan Ex. 7
305	2/25/2022	Dr. Robin Armstrong, "Stand Up." https://www.youtube.com/watch?v=StikJDXxAkM	N/A	N/A	Relevance, hearsay		
306	5/16/2022	May 16, 2022 Email from R. Armstrong to L. Lietchy re: AG Certificates for completed training for Robin Armstrong, attaching Scanned Documents	DEFS00029870	DEFS00029872			Armstrong Ex. 10
307	5/17/2022	May 17, 2022 Galveston County Press Release, <i>Dr. Robin Armstrong Appointed to Galveston County Commissioners Court</i>	DEFS00011776	DEFS00011776			Armstrong Ex. 4
308	5/17/2022	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	Hearsay		Armstrong Ex. 15
309	5/19/2022	May 19, 2022 Email from L. Lietchy to ITShelp re: Set-up for Newly Appointed County Commissioner	DEFS00017137	DEFS00017138			Armstrong Ex. 12
310	7/14/2022	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	Relevance, Hearsay; FRE 403		Giusti Ex. 21
311	7/27/2022	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	Hearsay		Armstrong Ex. 9
312	8/2/2022	Aug. 2, 2022 Email from N. Sigler to D. Sullivan re: November Master List, attaching Polling Locations 2022	DEFS00005272	DEFS00005274			Drummond Ex. 3, Sullivan Ex. 14
313	9/8/2022	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	Relevance, Hearsay; FRE 403		Giusti Ex. 23
314	9/30/2022	Sept. 30, 2022 M. Henry Tweet, https://twitter.com/JudgeMarkHenry/status/1575916835811139584?ctx=HHwWgICloeA5N4rAAAA	N/A	N/A	Authentication; foundation; object to document not previously produced		
315	11/1/2022	Nov. 1, 2021 Letter to D. Sullivan et al. from ACLU of Texas w/Attachments	N/A	N/A	Authentication; foundation (No bates label, witness did not recall it); relevance		Sullivan Ex. 11
316		Withdrawn by agreement of all parties.					

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317	11/21/2022	Nov. 21, 2022 Max Krochmal (United States) Expert Witness Report Appendix A - Curriculum Vita	N/A	N/A			Krochmal Expert Rpt. Appx. A
318		Withdrawn by agreement of all parties.					
319	12/9/2022	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/	NAACP00000001	NAACP00000009	Hearsay		Lofton Ex. 15
320	12/9/2022	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	NAACP00000018	NAACP00000023	Hearsay		Lofton Ex. 13
321	12/14/2022	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	Hearsay, inadmissible under FRE/FRCP 33, Not current version (4-21-2023)		Henry Ex. 33, Sigler Ex. 13
322	12/19/2022	Texas Election Code, Title 4. Time and Place of Elections, Chapter 43. Polling Places	N/A	N/A			Sullivan Ex. 12
323	12/19/2022	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	Hearsay, inadmissible under FRE/FRCP 33, Not current version (2-27-2023)		Giusti Ex. 16
324	12/19/2022	Dec. 19, 2022 Screenshot of Galveston County GIS Portal	N/A	N/A			Sigler Ex. 1
325		Withdrawn by agreement of all parties.					
326		Withdrawn by agreement of all parties.					
327	12/22/2022	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	Object to designation as an exhibit; witness testimony		Owens Ex. 12
328	1/1/2023	<i>American Historical Association</i> : Statement on Standards of Professional Conduct (updated January 2023)	N/A	N/A	Hearsay, authentication		Krochmal Ex. 6
329	1/3/2023	Jan. 3, 2023 Crystal Beach Local News Article, <i>COC Annual Meeting & Elections</i>	N/A	N/A	Hearsay		Apffel Ex. 19, Giusti Ex. 6
330		Withdrawn by agreement of all parties.					
331	1/5/2023	Jan. 5, 2023 Previous Galveston Commissioner Precincts	N/A	N/A			Apffel Ex. 28, Giusti Ex. 9
332		Withdrawn by agreement of all parties.					
333	1/11/2023	Screenshot of Judge Mark Henry Facebook page	N/A	N/A			Henry Ex. 4
334	1/11/2023	Screenshot of Judge Mark Henry Facebook page	N/A	N/A			Henry Ex. 6
335	1/12/2023	Jan. 12, 2023 Rene R. Rocha (United States) Expert Witness Report & Declaration	N/A	N/A	Helpfulness - FRE 702 and 703 Hearsay - FRE 801 and 802		Rocha Ex. 3

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336	1/12/2023	Jan. 12, 2023 Rene R. Rocha (United States) Expert Witness Report Appendix A - Curriculum Vita	N/A	N/A			Rocha Expert Rpt. Appx. A
337	1/13/2023	Jan. 13, 2023 Anthony E. Fairfax (United States) Expert Witness Report & Declaration	N/A	N/A	Helpfulness - FRE 702 and 703 Hearsay - FRE 801 and 802		US Opp. to MSJ Ex. 6, Fairfax Ex. 2
338	1/13/2023	Jan. 13, 2023 Anthony E. Fairfax (United States) Expert Witness Report Appendix A - Resume	N/A	N/A			Fairfax Expert Rpt. Appx. A
339	1/13/2023	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			Fairfax Expert Rpt. Appx. B
340	1/13/2023	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	Hearsay - FRE 801 and 802		Fairfax Expert Rpt. Appx. C
341	1/13/2023	Jan. 13, 2023 W. Cooper (NAACP) Expert Witness Report Exhibit A (CV)	N/A	N/A	Hearsay - FRE 801 and 802		Cooper Rep. Ex. A
342	1/13/2023	Jan. 13, 2023 W. Cooper (NAACP) Expert Witness Report Exhibit B (Methodology and Sources)	N/A	N/A	Helpfulness - FRE 702 and 703 Hearsay - FRE 801 and 802		Cooper Rep. Ex. B
343	1/13/2023	Jan. 13, 2023 W. Cooper (NAACP) Expert Witness Report Exhibit C (Selected Socio-Economic Data)	N/A	N/A	Hearsay - FRE 801 and 802		Cooper Rep. Ex. C
344	1/13/2023	Jan. 13, 2023 W. Cooper (NAACP) Expert Witness Report Exhibit D (http://www.fairdata2000.com/ACS_2015_19/Galveston/)	N/A	N/A	Hearsay - FRE 801 and 802; Reliability/FRE 703		Cooper Rep. Ex. D
345	1/13/2023	Jan. 13, 2023 W. Cooper (NAACP) Expert Witness Report Exhibit E (Benchmark Plan)	N/A	N/A	Hearsay - FRE 801 and 802		Cooper Rep. Ex. E
346	1/13/2023	Jan. 13, 2023 W. Cooper (NAACP) Expert Witness Report Exhibit F (Enacted Plan)	N/A	N/A	Hearsay - FRE 801 and 802		Cooper Rep. Ex. F
347	1/13/2023	Jan. 13, 2023 W. Cooper (NAACP) Expert Witness Report Exhibit G (2011 preclearance submission)	N/A	N/A	Hearsay - FRE 801 and 802		Cooper Rep. Ex. G
348	1/13/2023	Jan. 13, 2023 W. Cooper (NAACP) Expert Witness Report Exhibit H (Proposal 1)	N/A	N/A	Hearsay - FRE 801 and 802		Cooper Rep. Ex. H
349	1/13/2023	Jan. 13, 2023 W. Cooper (NAACP) Expert Witness Report Exhibit I (Illustrative Plan 1)	N/A	N/A	Hearsay - FRE 801 and 802		Cooper Rep. Ex. I
350	1/13/2023	Jan. 13, 2023 W. Cooper (NAACP) Expert Witness Report Exhibit J (Illustrative Plan 2)	N/A	N/A	Hearsay - FRE 801 and 802		Cooper Rep. Ex. J
351	1/13/2023	Jan. 13, 2023 W. Cooper (NAACP) Expert Witness Report Exhibit K (Illustrative Plan 3)	N/A	N/A	Hearsay - FRE 801 and 802		Cooper Rep. Ex. K
352	1/13/2023	Jan. 13, 2023 W. Cooper (NAACP) Expert Witness Report Exhibit L (Defs' DOJ Interrogatory Response excerpt)	N/A	N/A	Hearsay - FRE 801 and 802		Cooper Rep. Ex. L
353	1/13/2023	Jan. 13, 2023 W. Cooper (NAACP) Expert Witness Report Exhibit M (Illustrative Plan 1 shapefile)	N/A	N/A	Hearsay - FRE 801 and 802, object to format as not viewable as exhibit		Cooper Rep. Ex. M
354	1/13/2023	Jan. 13, 2023 W. Cooper (NAACP) Expert Witness Report Exhibit N (Illustrative Plan 2 shapefile)	N/A	N/A	Hearsay - FRE 801 and 802, object to format as not viewable as exhibit		Cooper Rep. Ex. N

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355	1/13/2023	Jan. 13, 2023 W. Cooper (NAACP) Expert Witness Report Exhibit O (Illustrative Plan 3 shapefile)	N/A	N/A	Hearsay - FRE 801 and 802, object to format as not viewable as exhibit		Cooper Rep. Ex. O
356	1/13/2023	Jan. 13, 2023 K. Oskooii (NAACP) Expert Witness Report & Declaration	N/A	N/A	Helpfulness - FRE 702 and 703 Hearsay - FRE 801 and 802		Oskooii Ex. 2
357	1/13/2023	Jan. 13, 2023 K. Oskooii (NAACP) Expert Witness Report Table 1: List of General Elections Analyzed	N/A	N/A	Hearsay - FRE 801 and 802		Oskooii Rep. Table 1
358	1/13/2023	Jan. 13, 2023 K. Oskooii (NAACP) Expert Witness Report Table 2: List of Primary Elections Analyzed	N/A	N/A	Hearsay - FRE 801 and 802		Oskooii Rep. Table 2
359	1/13/2023	Jan. 13, 2023 K. Oskooii (NAACP) Expert Witness Report Figure 1: Benchmark Map	N/A	N/A	Hearsay - FRE 801 and 802		Oskooii Rep. Figure 1
360	1/13/2023	Jan. 13, 2023 K. Oskooii (NAACP) Expert Witness Report Figure 2: Adopted Map	N/A	N/A	Hearsay - FRE 801 and 802		Oskooii Rep. Figure 2
361	1/13/2023	Jan. 13, 2023 K. Oskooii (NAACP) Expert Witness Report Figure 3: Plaintiff Map 1	N/A	N/A	Hearsay - FRE 801 and 802		Oskooii Rep. Figure 3
362	1/13/2023	Jan. 13, 2023 K. Oskooii (NAACP) Expert Witness Report Figure 4: Plaintiff Map 2	N/A	N/A	Hearsay - FRE 801 and 802		Oskooii Rep. Figure 4
363	1/13/2023	Jan. 13, 2023 K. Oskooii (NAACP) Expert Witness Report Figure 5: Plaintiff Map 3	N/A	N/A	Hearsay - FRE 801 and 802		Oskooii Rep. Figure 5
364	1/13/2023	Jan. 13, 2023 K. Oskooii (NAACP) Expert Witness Report Figure 6: Galveston County RxC Estimates for Candidates by Race	N/A	N/A	Hearsay - FRE 801 and 802		Oskooii Rep. Figure 6
365	1/13/2023	Jan. 13, 2023 K. Oskooii (NAACP) Expert Witness Report Figure 7: Galveston County Iterative EI Estimates for Candidates by Race	N/A	N/A	Hearsay - FRE 801 and 802		Oskooii Rep. Figure 7
366	1/13/2023	Jan. 13, 2023 K. Oskooii (NAACP) Expert Witness Report Figure 8: Galveston County Anglo, Black, Latino RxC Estimates	N/A	N/A	Hearsay - FRE 801 and 802		Oskooii Rep. Figure 8
367	1/13/2023	Jan. 13, 2023 K. Oskooii (NAACP) Expert Witness Report Figure 9: Galveston County Anglo, Black, Latino EI Estimates	N/A	N/A	Hearsay - FRE 801 and 802		Oskooii Rep. Figure 9
368	1/13/2023	Jan. 13, 2023 K. Oskooii (NAACP) Expert Witness Report Figure 10: Galveston County Turnout-Adjusted RPV Estimates	N/A	N/A	Hearsay - FRE 801 and 802		Oskooii Rep. Figure 10
369	1/13/2023	Jan. 13, 2023 K. Oskooii (NAACP) Expert Witness Report Figure 11: RxC Anglo Bloc Analysis by Precinct in Adopted Map	N/A	N/A	Hearsay - FRE 801 and 802		Oskooii Rep. Figure 11
370	1/13/2023	Jan. 13, 2023 K. Oskooii (NAACP) Expert Witness Report Exhibit A (CV)	N/A	N/A	Hearsay - FRE 801 and 802		Oskooii Rep. Ex. A
371	1/13/2023	Jan. 13, 2023 K. Oskooii (NAACP) Expert Witness Report Exhibit B (Benchmark, Adopted, and Cooper Maps)	N/A	N/A	Hearsay - FRE 801 and 802		Oskooii Rep. Ex. B
372	1/13/2023	Jan. 13, 2023 K. Oskooii (NAACP) Expert Witness Report Exhibit C (Figures 8-10)	N/A	N/A	Hearsay - FRE 801 and 802		Oskooii Rep. Ex. C
373	1/13/2023	Jan. 13, 2023 K. Oskooii (NAACP) Expert Witness Report Exhibit D (Texas Legislative Council data)	N/A	N/A	Hearsay - FRE 801 and 802		Oskooii Rep. Ex. D
374	1/13/2023	Jan. 13, 2023 K. Oskooii (NAACP) Expert Witness Report Exhibit E (VEST Texas Election data)	N/A	N/A	Hearsay - FRE 801 and 802		Oskooii Rep. Ex. E

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375	1/13/2023	Jan. 13, 2023 K. Oskooii (NAACP) Expert Witness Report Exhibit F (Merged Demographic/General Election Data for Adopted Plan)	N/A	N/A	Hearsay - FRE 801 and 802		Oskooii Rep. Ex. F
376	1/13/2023	Jan. 13, 2023 K. Oskooii (NAACP) Expert Witness Report Exhibit G (Merged Demographic/General Election Data for Benchmark Plan)	N/A	N/A	Hearsay - FRE 801 and 802		Oskooii Rep. Ex. G
377	1/13/2023	Jan. 13, 2023 K. Oskooii (NAACP) Expert Witness Report Exhibit H (Merged Demographic/General Election Data for Demonstrative Map 1)	N/A	N/A	Hearsay - FRE 801 and 802		Oskooii Rep. Ex. H
378	1/13/2023	Jan. 13, 2023 K. Oskooii (NAACP) Expert Witness Report Exhibit I (Merged Demographic/General Election Data for Demonstrative Map 2)	N/A	N/A	Hearsay - FRE 801 and 802		Oskooii Rep. Ex. I
379	1/13/2023	Jan. 13, 2023 K. Oskooii (NAACP) Expert Witness Report Exhibit J (Merged Demographic/General Election Data for Demonstrative Map 3)	N/A	N/A	Hearsay - FRE 801 and 802		Oskooii Rep. Ex. J
380	1/13/2023	Jan. 13, 2023 K. Oskooii (NAACP) Expert Witness Report Exhibit K (Merged Demographic/Primary Election Data)	N/A	N/A	Hearsay - FRE 801 and 802		Oskooii Rep. Ex. K
381	1/13/2023	Jan. 13, 2023 L. Stephens-Dougan (NAACP) Expert Witness Report & Declaration	N/A	N/A	Helpfulness - FRE 702 and 703 Hearsay - FRE 801 and 802		Stephens-Dougan Ex. 2; NAACP Opp. to MSJ Ex. 22
382	1/13/2023	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	Helpfulness - FRE 702 and 703 Hearsay - FRE 801 and 802		Stephens-Dougan Rep. Figure 1
383	1/13/2023	Jan. 13, 2023 L. Stephens-Dougan (NAACP) Expert Witness Report Exhibit A (CV)	N/A	N/A	Hearsay		Stephens-Dougan Rep. Ex. A
384	1/13/2023	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	Helpfulness - FRE 702 and 703 Hearsay - FRE 801 and 802		Petteway Opp. to MSJ Ex. 4
385	1/13/2023	Jan. 13, 2023 T. Rush (Petteway) Expert Report (including all data, exhibits and appendices attached or contained within the report)	N/A	N/A	Helpfulness - FRE 702 and 703 Hearsay - FRE 801 and 802		Rush Ex. 2
386	1/13/2023	Jan. 13, 2023 W. Cooper (NAACP) Expert Witness Report & Declaration	N/A	N/A	Helpfulness - FRE 702 and 703 Hearsay - FRE 801 and 802		Petteway Opp. to MSJ Ex. 3, Cooper Ex. 2, Owens Ex. 10, Rush Ex. 5
387	1/13/2023	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	Hearsay - FRE 801 and 802		Cooper Rep. Figure 1
388	1/13/2023	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	Hearsay - FRE 801 and 802		Cooper Rep. Figure 2

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389	1/13/2023	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	Hearsay - FRE 801 and 802		Cooper Rep. Figure 3
390	1/13/2023	Jan. 13, 2023 W. Cooper (NAACP) Expert Witness Report Figure 4: Galveston County Municipalities and CDPs (2020 Census)	N/A	N/A	Hearsay - FRE 801 and 802		Cooper Rep. Figure 4
391	1/13/2023	Jan. 13, 2023 W. Cooper (NAACP) Expert Witness Report Figure 5: Galveston County Areas Eligible for USDA Summer Meal Subsidies	N/A	N/A	Hearsay - FRE 801 and 802		Cooper Rep. Figure 5
392	1/13/2023	Jan. 13, 2023 W. Cooper (NAACP) Expert Witness Report Figure 6: Benchmark Plan	N/A	N/A	Hearsay - FRE 801 and 802		Cooper Rep. Figure 6
393	1/13/2023	Jan. 13, 2023 W. Cooper (NAACP) Expert Witness Report Figure 7: 2012 Benchmark Plan – 2020 Population Summary	N/A	N/A	Hearsay - FRE 801 and 802		Cooper Rep. Figure 7
394	1/13/2023	Jan. 13, 2023 W. Cooper (NAACP) Expert Witness Report Figure 8: Enacted Plan	N/A	N/A	Hearsay - FRE 801 and 802		Cooper Rep. Figure 8
395	1/13/2023	Jan. 13, 2023 W. Cooper(NAACP) Expert Witness Report Figure 9: Overlay of Enacted over Benchmark	N/A	N/A	Hearsay - FRE 801 and 802		Cooper Rep. Figure 9
396	1/13/2023	Jan. 13, 2023 W. Cooper (NAACP) Expert Witness Report Figure 11: 2021 Enacted Plan – Population Summary	N/A	N/A	Hearsay - FRE 801 and 802		Cooper Rep. Figure 11
397	1/13/2023	Jan. 13, 2023 W. Cooper (NAACP) Expert Witness Report Figure 12: 2021 Proposed Plan	N/A	N/A	Hearsay - FRE 801 and 802		Cooper Rep. Figure 12
398	1/13/2023	Jan. 13, 2023 W. Cooper (NAACP) Expert Witness Report Figure 13: 2021 Proposed Plan 1 – Population Summary	N/A	N/A	Hearsay - FRE 801 and 802		Cooper Rep. Figure 13
399	1/13/2023	Jan. 13, 2023 W. Cooper (NAACP) Expert Witness Report Figure 14: Illustrative Map 1	N/A	N/A	Hearsay - FRE 801 and 802		Cooper Rep. Figure 14
400	1/13/2023	Jan. 13, 2023 W. Cooper (NAACP) Expert Witness Report Figure 15: Illustrative Map 1 – Population Summary	N/A	N/A	Hearsay - FRE 801 and 802		Cooper Rep. Figure 15
401	1/13/2023	Jan. 13, 2023 W. Cooper (NAACP) Expert Witness Report Figure 16: Illustrative Map 2	N/A	N/A	Hearsay - FRE 801 and 802		Cooper Rep. Figure 16
402	1/13/2023	Jan. 13, 2023 W. Cooper (NAACP) Expert Witness Report Figure 17: Illustrative Map 2 – Population Summary	N/A	N/A	Hearsay - FRE 801 and 802		Cooper Rep. Figure 17
403	1/13/2023	Jan. 13, 2023 W. Cooper (NAACP) Expert Witness Report Figure 18: Illustrative Map 3	N/A	N/A	Hearsay - FRE 801 and 802		Cooper Rep. Figure 18
404	1/13/2023	Jan. 13, 2023 W. Cooper (NAACP) Expert Witness Report Figure 19: Illustrative Map 3 – Population Summary	N/A	N/A	Hearsay - FRE 801 and 802		Cooper Rep. Figure 19
405		Withdrawn by agreement of all parties.					
406	1/17/2023	Office of the Harris County Attorney Christian D. Menefee - Join the discussion	N/A	N/A	Hearsay, authentication		Henry Ex. 49
407	1/17/2023	Tex. Elec. Code § 172.023	N/A	N/A			Henry Ex. 42
408		Withdrawn by agreement of all parties.					

Defendants' Objections to Plaintiffs' Exhibits

PX No.	Doc Date	Description	Beg Bates	End Bates	Defendants' Objections	Plaintiffs Notes on Revisions	References
409	1/20/2023	Native Shapefiles for Demonstrative Map 1.			Hearsay - FRE 801 and 802, object to format as not viewable as exhibit		Expert Production from 2023.01.20
410	1/20/2023	Native Shapefiles for Demonstrative Map 2			Hearsay - FRE 801 and 802, object to format as not viewable as exhibit		Expert Production from 2023.01.20
411	1/20/2023	Native Shapefiles for Demonstrative Map 3			Hearsay - FRE 801 and 802, object to format as not viewable as exhibit		Expert Production from 2023.01.20
412	1/27/2023	Jan. 27, 2023 M. Krochmal (United States) Expert Witness Report & Declaration	N/A	N/A	Helpfulness - FRE 702 and 703 Hearsay - FRE 801 and 802		US Opp. to MSJ Ex. 10, Krochmal Ex. 2, Owens Ex. 16
413	1/27/2023	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	Hearsay - FRE 801 and 802		Krochmal Expert Rpt. Appx. B
414	1/27/2023	Jan. 27, 2023 T. Burch (Petteway/NAACP) Expert Witness Report & Declaration	N/A	N/A	Helpfulness - FRE 702 and 703 Hearsay - FRE 801 and 802		NAACP Opp. to MSJ Ex. 1, Petteway Opp. to MSJ Ex. 1, Burch Ex. 2
415	1/27/2023	Rush Alternative Map 1			Hearsay - FRE 801 and 802		Burch Report Appendix B.
416	1/27/2023	Rush Alternative Map 2			Hearsay - FRE 801 and 802		Burch Report Appendix B.
417	1/27/2023	Rush Alternative Map 3			Hearsay - FRE 801 and 802		Burch Report Appendix B
418	1/27/2023	Rush Alternative Map 4			Hearsay - FRE 801 and 802		Burch Report Appendix B
419	1/27/2023	Native Shapefile for Rush Alternative Map 3			Objection Hearsay - FRE 801 and 802, not useable as exhibit		Expert production from 2023.01.27
420	1/27/2023	Native Shapefile for Rush Alternative Map 4			Objection Hearsay - FRE 801 and 802, not useable as exhibit		Expert production from 2023.01.27
421	1/27/2023	Native Shapefiles for Alternative Map 1.			Objection Hearsay - FRE 801 and 802, not useable as exhibit		Expert production from 2023.01.27
422	1/27/2023	Native Shapefiles for Alternative Map 2			Objection Hearsay - FRE 801 and 802, not useable as exhibit		Expert production from 2023.01.27

Defendants' Objections to Plaintiffs' Exhibits

PX No.	Doc Date	Description	Beg Bates	End Bates	Defendants' Objections	Plaintiffs Notes on Revisions	References
423	1/27/2023	Reconstituted_VTDs (spreadsheet produced by U.S. on January 27, 2023)	Provided via email on January 27, 2023		Incomplete document; authentication	This was provided to Defendants in a zip file called "Trouistine Data Files" attached to the email in which the United States produced Professor Trounstine's original expert report on January 27, 2023	US Opp. to MSJ Ex. 22
424		Withdrawn by agreement of all parties.					
425	2/15/2023	Feb. 15, 2023 Cheryl Johnson Campaign Website, http://vote4cheryl.com	N/A	N/A	Relevance, Hearsay - FRE 801 and 802		Johnson Ex. 1
426	2/23/2023	Feb. 23, 2023 Email from D. Rose to V. Richardson of 8.4.21 email from Billy Williams to Mark Henry	PET0000007	PET0000008			Rose Ex. 4
427	2/23/2023	Feb. 23, 2023 Email from D. Rose to V. Richardson of 4.10.21 email from Mary Patrick	PET0000058	PET0000060	Hearsay		Petteway Ex. 3
428		Withdrawn by agreement of all parties.					
429	2/27/2023	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	Hearsay, inadmissible under FRE/FRCP 33		Rose Ex. 2
430		Withdrawn by agreement of all parties.					
431		Withdrawn by agreement of all parties.					
432	3/8/2023	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	Hearsay - FRE 801 and 802		Courville Ex. 15
433		Withdrawn by agreement of all parties.					
434		Withdrawn by agreement of all parties.					
435	3/17/2023	Mar. 17, 2023 J. R. Alford (Defendants) Expert Witness Report & Declaration	N/A	N/A	Helpfulness - FRE 702 and 703 Hearsay - FRE 801 and 802		Alford Ex. 2, Trounstine Ex. 4, US Opp. to MSJ Ex. 31
436		Withdrawn by agreement of all parties.					
437		Withdrawn by agreement of all parties.					
438	3/27/2023	William S. Cooper (NAACP) Expert Witness Rebuttal Report & Declaration (March 27, 2023)	N/A	N/A	Helpfulness - FRE 702 and 703 Hearsay - FRE 801 and 802		Cooper Ex. 3, Owens Ex. 11
439	3/27/2023	Mar. 27, 2023 W. Cooper (NAACP) Expert Witness Rebuttal Report Exhibit A (5-Year 2017-2021 ACS Special Tabulation CVAP)	N/A	N/A	Hearsay - FRE 801 and 802; Reliability/FRE 703		Cooper Rebuttal Ex. A
440	3/27/2023	Mar. 27, 2023 W. Cooper (NAACP) Expert Witness Rebuttal Report Exhibit B (Communities of Interest)	N/A	N/A	Hearsay - FRE 801 and 802		Cooper Rebuttal Ex. B
441	3/27/2023	Mar. 27, 2023 W. Cooper (NAACP) Expert Witness Rebuttal Report Exhibit C (Travel Contiguity)	N/A	N/A	Hearsay - FRE 801 and 802		Cooper Rebuttal Ex. C
442	3/27/2023	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	Hearsay - FRE 801 and 802		Cooper Rebuttal Ex. D

Defendants' Objections to Plaintiffs' Exhibits

PX No.	Doc Date	Description	Beg Bates	End Bates	Defendants' Objections	Plaintiffs Notes on Revisions	References
443	3/27/2023	Mar. 27, 2023 W. Cooper (NAACP) Expert Witness Rebuttal Report Exhibit E (Illustrative Plan 3A)	N/A	N/A	Hearsay - FRE 801 and 802		Cooper Rebuttal Ex. E
444	3/27/2023	Mar. 27, 2023 W. Cooper (NAACP) Expert Witness Rebuttal Figure 1: Galveston County Divisions – 2020 Census	N/A	N/A	Hearsay - FRE 801 and 802		Cooper Rebuttal Figure 1
445	3/27/2023	Mar. 27, 2023 W. Cooper (NAACP) Expert Witness Rebuttal Figure 2: Galveston County Regions	N/A	N/A	Hearsay - FRE 801 and 802		Cooper Rebuttal Figure 2
446	3/27/2023	Mar. 27, 2023 W. Cooper (NAACP) Expert Witness Rebuttal Figure 3: Illustrative Map 3A	N/A	N/A	Hearsay - FRE 801 and 802		Cooper Rebuttal Figure 3
447	3/27/2023	Mar. 27, 2023 W. Cooper (NAACP) Expert Witness Rebuttal Figure 4: Illustrative Map 3A – Population Summary	N/A	N/A	Hearsay - FRE 801 and 802		Cooper Rebuttal Figure 4
448		Withdrawn by agreement of all parties.					
449		Withdrawn by agreement of all parties.					
450		Withdrawn by agreement of all parties.					
451	3/31/2023	Mar. 31, 2023 M. Owens (Defendants) Amended Expert Witness Report & Declaration	N/A	N/A	Hearsay		Cooper Ex. 6, Owens Ex. 9, Owens Ex. 15, Krochmal Ex. 11
452	4/4/2023	Apr. 4, 2023 K. Oskooii (NAACP) Expert Witness Rebuttal Report & Declaration	N/A	N/A	Hearsay - FRE 801 and 802		Oskooii Ex. 3
453	4/7/2023	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	Hearsay - FRE 801 and 802		Fairfax Rebuttal Rpt. Appx. A
454	4/7/2023	Apr. 7, 2023 A. Fairfax (United States) Expert Witness Rebuttal Report & Declaration	N/A	N/A	Helpfulness - FRE 702 and 703 Hearsay - FRE 801 and 802		US Opp. to MSJ Ex. 18, Fairfax Ex. 3
455	4/7/2023	Apr. 7, 2023 J. Trounstine (United States) Expert Witness Rebuttal Report & Declaration	N/A	N/A	Helpfulness - FRE 702 and 703 Hearsay - FRE 801 and 802		Trounstine Ex. 3
456		Withdrawn by agreement of all parties.					
457		Withdrawn by agreement of all parties.					
458		Withdrawn by agreement of all parties.					
459	4/13/2023	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	Hearsay - FRE 801 and 802		Owens Ex. 4
460	4/13/2023	Data Files	N/A	N/A	Hearsay - FRE 801 and 802		Owens Ex. 1
461	4/13/2023	Book, <i>Game of Politics: Conflict, Power, and Representation</i> , by K. Bryant Jr., E. Lopez, and M. Owens	N/A	N/A	Hearsay - FRE 801 and 802		Owens Ex. 3
462	4/13/2023	Screenshot of M. Owens, Political Science Profile	N/A	N/A	Hearsay - FRE 801 and 802		Owens Ex. 5
463	4/13/2023	Screenshot of M. Owens, Associate Professor of Political Science Profile	N/A	N/A	Hearsay - FRE 801 and 802		Owens Ex. 6
464	4/13/2023	Galveston County Population map	N/A	N/A	Hearsay - FRE 801 and 802		Owens Ex. 17
465	4/14/2023	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	Helpfulness - FRE 702 and 703 Hearsay - FRE 801 and 802		

Defendants' Objections to Plaintiffs' Exhibits

PX No.	Doc Date	Description	Beg Bates	End Bates	Defendants' Objections	Plaintiffs Notes on Revisions	References
466		Withdrawn by agreement of all parties.					
467		Withdrawn by agreement of all parties.					
468	4/14/2023	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	Hearsay - FRE 801 and 802		Rush Ex. 3
469	4/14/2023	Native Shapefile for Rush Demonstrative Map 2b.			Hearsay - FRE 801 and 802, format not viewable as exhibit		Expert production from 2023.04.14
470		Withdrawn by agreement of all parties.					
471		Withdrawn by agreement of all parties.					
472	4/20/2023	Demographic Data from Dave's Redistricting	N/A	N/A	Hearsay - FRE 801 and 802; relevance; foundation; authentication; reliability		Rush Ex. 6
473		Withdrawn by agreement of all parties.					
474		Withdrawn by agreement of all parties.					
475	4/21/2023	Index of/ACS_2015_19/Galveston (2015-2019 ACS)	N/A	N/A	Hearsay - FRE 801 and 802; relevance; foundation; authentication; Reliability/FRE 703		Cooper Ex. 5
476	4/21/2023	Apr. 21, 2023 Jessica Trounstine (United States) Expert Witness Second Corrected Expert Report	N/A	N/A	Helpfulness - FRE 702 and 703 Hearsay - FRE 801 and 802		US Opp. to MSJ Ex. 17, Alford Ex. 1
477	4/2023	Apr. 21, 2023 Jessica Trounstine (United States) Second Corrected Expert Witness Report Appendix A - Curriculum Vita	N/A	N/A	Hearsay - FRE 801 and 802		Trounstine Expert Rpt. Appx. A
478	4/21/2023	Apr. 21, 2023 Jessica Trounstine (United States) Second Corrected Expert Witness Report Appendix B - Methodological Appendix	N/A	N/A	Helpfulness - FRE 702 and 703 Hearsay - FRE 801 and 802		Trounstine Expert Rpt. Appx. B
479	4/21/2023	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	Hearsay - FRE 801 and 802		Trounstine Expert Rpt. Appx. C
480	4/21/2023	Apr. 21, 2023 Jessica Trounstine (United States) Second Corrected Expert Witness Report Appendix D - Professor John Logan Data Appendix	N/A	N/A	Hearsay - FRE 801 and 802		Trounstine Expert Rpt. Appx. D
481		Withdrawn by agreement of all parties.					
482		Withdrawn by agreement of all parties.					
483		Withdrawn by agreement of all parties.					
484		Withdrawn by agreement of all parties.					
485	5/15/2023	May 15, 2023 Expert Declaration of Tye Rush	N/A	N/A	Helpfulness - FRE 702 and 703 Hearsay - FRE 801 and 802		Petteway Opp. to MSJ Ex. 6
486	5/15/2023	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	Helpfulness - FRE 702 and 703 Hearsay - FRE 801 and 802		Petteway Opp. to MSJ Ex. 5

Defendants' Objections to Plaintiffs' Exhibits

PX No.	Doc Date	Description	Beg Bates	End Bates	Defendants' Objections	Plaintiffs Notes on Revisions	References
487	5/15/2023	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	Helpfulness - FRE 702 and 703 Hearsay - FRE 801 and 802		Petteway Opp. to MSJ Ex. 2
488	5/15/2023	May 15, 2023 Rush Corrected Rebuttal Report Appendix B: Rush Demonstrative 2b	N/A	N/A	Hearsay - FRE 801 and 802		Rush Corrected Rebuttal Report Appendix B
489	5/15/2023	May 15, 2023 Rush Corrected Report Figure 1: Rush Demonstrative Map 1	N/A	N/A	Hearsay - FRE 801 and 802		Rush Corrected Report, Figure 1
490	5/15/2023	May 15, 2023 Rush Corrected Report Figure 2: Rush Demonstrative Map 2	N/A	N/A	Hearsay - FRE 801 and 802		Rush Corrected Report, Figure 2
491	5/15/2023	May 15, 2023 Rush Corrected Report Figure 3: Rush Demonstrative Map 3	N/A	N/A	Hearsay - FRE 801 and 802		Rush Corrected Report, Figure 3
492	5/26/2023	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	Hearsay - FRE 801 and 802; foundation; Witness not on Disclosures, not on Plaintiffs' witness list, not designated as an expert, analysis not provided in discovery, not deposed		Doc. 185-16 pp 9-12
493	5/26/2023	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	Hearsay - FRE 801 and 802; Witness not on Disclosures, not on Plaintiffs' witness list, not designated as an expert, analysis not provided in discovery, not deposed		Doc. 185-16 pp. 6-8
494	5/31/2023	May 31, 2023 Declaration of Jonathan D. Brooks (DOJ geographer created 2021 plan shapefiles and demographic data)	N/A	N/A	Hearsay - FRE 801 and 802; Witness not on Disclosures, not designated as an expert, not on Plaintiffs' witness list; analysis not provided in discovery, not deposed		US Opp. to MSJ Ex. 15
495	5/31/2023	May 31, 2023 Declaration of Lucille McGaskey	N/A	N/A	Hearsay		US Opp. to MSJ Ex. 19
496	5/31/2023	May 31, 2023 Zoom Video recording of Drs. Barreto, Alford and Stevenson and Mr. Rios	N/A	N/A	Hearsay		
497	6/1/2023	Jun. 1, 2023 Maptitude Screenshot - Galveston Alt 4 Map Census Data	Holmes 001288	Holmes 001299			Holmes Ex. 1
498	6/1/2023	Jun. 1, 2023 Declaration of Joe Compian	N/A	N/A	Hearsay		NAACP Opp. to MSJ Ex. 6
499	6/1/2023	Jun. 1, 2023 Declaration of Robert Quintero	N/A	N/A	Hearsay - FRE 801 and 802		NAACP Opp. to MSJ Ex. 7
500	6/1/2023	Jun. 1, 2023 Declaration of Sharon B. Lewis	N/A	N/A	Hearsay - FRE 801 and 802		US Opp. to MSJ Ex. 20
501	6/1/2023	Jun. 1, 2023 Declaration of Jessica Trounstine (United States) Expert Witness	N/A	N/A	Helpfulness - FRE 702 and 703 Hearsay - FRE 801 and 802		US Opp. to MSJ Ex. 21
502		Withdrawn by agreement of all parties.					

Defendants' Objections to Plaintiffs' Exhibits

PX No.	Doc Date	Description	Beg Bates	End Bates	Defendants' Objections	Plaintiffs Notes on Revisions	References
503	6/2/2023	Jun. 2, 2023 Declaration of Tye Rush (Petteway) Expert Witness	N/A	N/A	Helpfulness - FRE 702 and 703 Hearsay - FRE 801 and 802		Petteway Opp. to MSJ Ex. 7
504	6/2/2023	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	Hearsay - FRE 801 and 802		US Opp. to MSJ Ex. 9
505	6/14/2023	Jun. 14, 2023 Supplemental Report of Dr. Kassra A.R. Oskooii	N/A	N/A	Helpfulness - FRE 702 and 703 Hearsay - FRE 801 and 802		
506		Withdrawn by agreement of all parties.					
507	6/14/2023	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	Hearsay - FRE 801 and 802		
508	6/14/2023	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	Hearsay - FRE 801 and 802		
509	6/14/2023	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	Hearsay - FRE 801 and 802		
510	6/14/2023	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	Hearsay - FRE 801 and 802		
511	6/14/2023	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	Hearsay - FRE 801 and 802		
512	6/14/2023	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	Hearsay - FRE 801 and 802		
513	6/14/2023	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	Hearsay - FRE 801 and 802		
514	6/14/2023	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	Hearsay - FRE 801 and 802		
515	6/19/2023	Jun. 19, 2023 Map & Population Summary	N/A	N/A	Hearsay - FRE 801 and 802		Bryan Ex. 5
516	6/19/2023	Jun. 19, 2023 Map & Population Summary	N/A	N/A	Hearsay - FRE 801 and 802		Bryan Ex. 6
517		Withdrawn by agreement of all parties.					
518		Withdrawn by agreement of all parties.					
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	Hearsay - FRE 801 and 802		Armstrong Ex. 2
520	12/3/2021	Dec. 3, 2021 Email from K. Saludis to A. Paluch re : Registered Voter File Request, attaching Preliminary Listing of Precinct Changes Galveston County Texas 12.1.2021	DEFS00010347	DEFS00010350			
521	N/A	Spreadsheet with total population and VAP broken down by race for Galveston County Commission districts	DEFS00030117	DEFS00030117			

Defendants' Objections to Plaintiffs' Exhibits

PX No.	Doc Date	Description	Beg Bates	End Bates	Defendants' Objections	Plaintiffs Notes on Revisions	References
522	10/28/2021	Map 1 - Galveston Precincts Listed by Districts	DEFS00032890	DEFS00032901			
523	10/28/2021	Map 2- Galveston Precincts Listed by Districts	DEFS00032902	DEFS00032924			
524	10/17/2021	Galveston Texas Draft Optimal D Plan	DEFS00036199	DEFS00036199	Object to description not matching bates number, should be DEFS00036199 (identified bates is a spreadsheet)		Bryan Ex. 8
525	10/17/2021	Oct. 17, 2021 Spreadsheet	DEFS00036197	DEFS00036197	Hearsay - FRE 801 and 802		Bryan Ex. 9
526	9/12/2022	Galveston Texas Draft Minimum Change Plan	DEFS00036811	DEFS00036812			Bryan Ex. 10
527	10/22/2021	Oct. 22, 2021 Email from T. Bryan to D. Oldham re Updated Spreadsheet (See PX 528 for Attachment)	DEFS00031181	DEFS00031181			Bryan Ex. 11
528	10/22/2021	Spreadsheet with blocks data including racial and political breakdowns for Map 1 and Map 2	DEFS00031182	DEFS00031182	Hearsay - FRE 801 and 802		Bryan Ex. 12
529	N/A	Galveston Texas Map with Precincts	DEFS00035515	DEFS00035515			Bryan Ex. 17
530	9/7/2011	Sep. 7, 2011 Email from B. Chapman to M. Fitzgerald, N. Sigler re FW: Redistricting Resolutions w/ attachments	DEFS00036236, DEFS00032946	DEFS00036237, DEFS00032951			
531	8/15/2011	Minutes of 8/15/2011 redistricting public hearing	DEFS00032964	DEFS00032965	Relevance		
532	8/16/2011	Minutes of 8/16/2011 redistricting public hearing	DEFS00032966	DEFS00032967	Relevance		

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

TERRY PETTEWAY, et al. Plaintiffs,	§	
v.	§	Civil Action No. 3:22-CV-00057
GALVESTON COUNTY, TEXAS, et al.	§	(consolidated)
Defendants.	§	
	§	
UNITED STATES OF AMERICA,	§	
Plaintiffs,	§	
v.	§	Civil Action No. 3:22-CV-00093
GALVESTON COUNTY, TEXAS, et al.	§	
Defendants.	§	
	§	
DICKINSON BAY AREA BRANCH	§	
NAACP, et al.	§	
Plaintiffs,	§	
v.	§	Civil Action No. 3:22-CV-00117
GALVESTON COUNTY, TEXAS, et al.	§	
Defendants.	§	
	§	

ORDER ON OBJECTIONS TO PLAINTIFFS’ PROPOSED TRIAL EXHIBITS

The Court has considered Defendants’ objections to Plaintiffs’ proposed trial exhibits, the record and arguments of counsel, and hereby orders:

PX No.	Objection(s)	Sustained	Overruled
1	Relevance		
2	Relevance		
3	Relevance		
4	Relevance		

PX No.	Objection(s)	Sustained	Overruled
5	Authentication; Foundation; Hearsay; Object to use of document not disclosed in response to disclosures, copy not provided until 7/14/2023;		
6	Hearsay, Relevance		
7	Relevance		
8	Relevance		
9	Relevance		
12	Hearsay		
13	Relevance, foundation		
17	Relevance, authentication, foundation (unsigned letter; signed copy is at DEFS00035811-816)		
21	Relevance		
22	Relevance		
23	Relevance		
26	Hearsay, relevance		
29	Relevance		
40	Relevance, foundation		
47	Relevance		
48	Relevance		
49	Relevance		
51	FRE 106 - Incomplete document (MSJ PDF Exhibit incomplete; should be submitted in native format)		
59	Inadmissible under FRE 408 as a settlement negotiation; incomplete document		
60	Relevance, hearsay		
61	Inadmissible under FRE 408 as a settlement negotiation; incomplete document		
62	Hearsay		

PX No.	Objection(s)	Sustained	Overruled
65	Relevance, Hearsay (news article in body of email)		
66	Improper designation of entire deposition transcript as documentary evidence; entire transcript is not evidence and contains inadmissible testimony and attorney discussion		
67	Improper designation of entire transcript as documentary evidence; entire transcript is not evidence and not all portions are relevant		
68	Relevance; Hearsay		
69	Hearsay		
70	Hearsay		
71	Hearsay		
73	Relevance; hearsay; authentication; FRE 403		
74	Relevance; hearsay; authentication		
75	Hearsay		
76	Relevance		
77	Hearsay		
78	Hearsay		
79	Hearsay		
80	Relevance; hearsay; authentication; not disclosed prior to exchange of exhibit list; improper format for record		
81	Hearsay		
82	Relevance		
83	Relevance		
84	Relevance		
85	Relevance		
86	Hearsay		
88	Relevance		

PX No.	Objection(s)	Sustained	Overruled
89	Relevance		
91	Relevance; hearsay; authentication; foundation		
92	Hearsay		
97	Relevance; authentication		
98	Relevance		
99	Relevance; incomplete document		
100	Relevance		
102	Hearsay		
106	Relevance; hearsay		
107	Hearsay		
108	Hearsay; Authentication; Reliability/FRE 703		
109	Hearsay		
110	Hearsay		
111	Hearsay		
112	Hearsay		
113	Hearsay		
115	Hearsay		
118	Hearsay		
119	Hearsay		
120	Hearsay		
127	Relevance		
129	Relevance		
134	Hearsay		
135	FRE 106 - Incomplete document, need attachments		
136	Hearsay		
137	Hearsay		

PX No.	Objection(s)	Sustained	Overruled
139	Relevance (DEFS00028055-00028064 not relevant)		
140	Object to use of document not produced until pretrial exchanges; Authentication; errors in transcription		
141	Relevance; FRE 403		
144	Hearsay		
146	Hearsay, relevance		
150	Hearsay		
151	Hearsay		
152	Relevance		
153	Relevance		
154	Hearsay		
157	Hearsay		
158	Hearsay		
162	Relevance		
168	Relevance, Foundation, Authentication, Not provided prior to exhibit list exchange, hearsay, attempt to provide legal opinion as evidence		
190	FRE 106 incomplete document, complete Excel spreadsheet should be submitted		
206	Hearsay		
210	FRE 106 - Incomplete document; DX 264 is complete native version		
220	FRE 106 Incomplete document, lacks attachments through DEFS00027972		
273	Hearsay		
278	Pages Holmes 323-24, 344, 346 contain hearsay and previously undisclosed expert analysis		

PX No.	Objection(s)	Sustained	Overruled
279	Hearsay		
280	Relevance, Hearsay; FRE 403		
286	Relevance, authentication		
294	Hearsay		
300	Relevance, hearsay		
301	Hearsay		
302	Hearsay		
305	Relevance, hearsay		
308	Hearsay		
310	Relevance, Hearsay; FRE 403		
311	Hearsay		
313	Relevance, Hearsay; FRE 403		
314	Authentication; foundation; object to document not previously produced		
315	Authentication; foundation (No bates label, witness did not recall it); relevance		
319	Hearsay		
320	Hearsay		
321	Hearsay, inadmissible under FRE/FRCP 33, Not current version (4-21-2023)		
323	Hearsay, inadmissible under FRE/FRCP 33, Not current version (2-27-2023)		
327	Object to designation as an exhibit; witness testimony		
328	Hearsay, authentication		
329	Hearsay		
335	Helpfulness - FRE 702 and 703 Hearsay - FRE 801 and 802		

PX No.	Objection(s)	Sustained	Overruled
337	Helpfulness - FRE 702 and 703 Hearsay - FRE 801 and 802		
340	Hearsay - FRE 801 and 802		
341	Hearsay - FRE 801 and 802		
342	Helpfulness - FRE 702 and 703 Hearsay - FRE 801 and 802		
343	Hearsay - FRE 801 and 802		
344	Hearsay - FRE 801 and 802; Reliability/FRE 703		
345	Hearsay - FRE 801 and 802		
346	Hearsay - FRE 801 and 802		
347	Hearsay - FRE 801 and 802		
348	Hearsay - FRE 801 and 802		
349	Hearsay - FRE 801 and 802		
350	Hearsay - FRE 801 and 802		
351	Hearsay - FRE 801 and 802		
352	Hearsay - FRE 801 and 802		
353	Hearsay - FRE 801 and 802, object to format as not viewable as exhibit		
354	Hearsay - FRE 801 and 802, object to format as not viewable as exhibit		
355	Hearsay - FRE 801 and 802, object to format as not viewable as exhibit		
356	Helpfulness - FRE 702 and 703 Hearsay - FRE 801 and 802		
357	Hearsay - FRE 801 and 802		
358	Hearsay - FRE 801 and 802		
359	Hearsay - FRE 801 and 802		
360	Hearsay - FRE 801 and 802		

PX No.	Objection(s)	Sustained	Overruled
361	Hearsay - FRE 801 and 802		
362	Hearsay - FRE 801 and 802		
363	Hearsay - FRE 801 and 802		
364	Hearsay - FRE 801 and 802		
365	Hearsay - FRE 801 and 802		
366	Hearsay - FRE 801 and 802		
367	Hearsay - FRE 801 and 802		
368	Hearsay - FRE 801 and 802		
369	Hearsay - FRE 801 and 802		
370	Hearsay - FRE 801 and 802		
371	Hearsay - FRE 801 and 802		
372	Hearsay - FRE 801 and 802		
373	Hearsay - FRE 801 and 802		
374	Hearsay - FRE 801 and 802		
375	Hearsay - FRE 801 and 802		
376	Hearsay - FRE 801 and 802		
377	Hearsay - FRE 801 and 802		
378	Hearsay - FRE 801 and 802		
379	Hearsay - FRE 801 and 802		
380	Hearsay - FRE 801 and 802		
381	Helpfulness - FRE 702 and 703 Hearsay - FRE 801 and 802		
382	Helpfulness - FRE 702 and 703 Hearsay - FRE 801 and 802		
383	Hearsay		
384	Helpfulness - FRE 702 and 703 Hearsay - FRE 801 and 802		

PX No.	Objection(s)	Sustained	Overruled
385	Helpfulness - FRE 702 and 703 Hearsay - FRE 801 and 802		
386	Helpfulness - FRE 702 and 703 Hearsay - FRE 801 and 802		
387	Hearsay - FRE 801 and 802		
388	Hearsay - FRE 801 and 802		
389	Hearsay - FRE 801 and 802		
390	Hearsay - FRE 801 and 802		
391	Hearsay - FRE 801 and 802		
392	Hearsay - FRE 801 and 802		
393	Hearsay - FRE 801 and 802		
394	Hearsay - FRE 801 and 802		
395	Hearsay - FRE 801 and 802		
396	Hearsay - FRE 801 and 802		
397	Hearsay - FRE 801 and 802		
398	Hearsay - FRE 801 and 802		
399	Hearsay - FRE 801 and 802		
400	Hearsay - FRE 801 and 802		
401	Hearsay - FRE 801 and 802		
402	Hearsay - FRE 801 and 802		
403	Hearsay - FRE 801 and 802		
404	Hearsay - FRE 801 and 802		
406	Hearsay, authentication		
409	Hearsay - FRE 801 and 802, object to format as not viewable as exhibit		
410	Hearsay - FRE 801 and 802, object to format as not viewable as exhibit		
411	Hearsay - FRE 801 and 802, object to format as not viewable as exhibit		

PX No.	Objection(s)	Sustained	Overruled
412	Helpfulness - FRE 702 and 703 Hearsay - FRE 801 and 802		
413	Hearsay - FRE 801 and 802		
414	Helpfulness - FRE 702 and 703 Hearsay - FRE 801 and 802		
415	Hearsay - FRE 801 and 802		
416	Hearsay - FRE 801 and 802		
417	Hearsay - FRE 801 and 802		
418	Hearsay - FRE 801 and 802		
419	Objection Hearsay - FRE 801 and 802, not useable as exhibit		
420	Objection Hearsay - FRE 801 and 802, not useable as exhibit		
421	Objection Hearsay - FRE 801 and 802, not useable as exhibit		
422	Objection Hearsay - FRE 801 and 802, not useable as exhibit		
423	Incomplete document; authentication		
425	Relevance, Hearsay - FRE 801 and 802		
427	Hearsay		
429	Hearsay, inadmissible under FRE/FRCP 33		
432	Hearsay - FRE 801 and 802		
435	Helpfulness - FRE 702 and 703 Hearsay - FRE 801 and 802		
438	Helpfulness - FRE 702 and 703 Hearsay - FRE 801 and 802		
439	Hearsay - FRE 801 and 802; Reliability/FRE 703		
440	Hearsay - FRE 801 and 802		
441	Hearsay - FRE 801 and 802		

PX No.	Objection(s)	Sustained	Overruled
442	Hearsay - FRE 801 and 802		
443	Hearsay - FRE 801 and 802		
444	Hearsay - FRE 801 and 802		
445	Hearsay - FRE 801 and 802		
446	Hearsay - FRE 801 and 802		
447	Hearsay - FRE 801 and 802		
451	Hearsay		
452	Hearsay - FRE 801 and 802		
453	Hearsay - FRE 801 and 802		
454	Helpfulness - FRE 702 and 703 Hearsay - FRE 801 and 802		
455	Helpfulness - FRE 702 and 703 Hearsay - FRE 801 and 802		
459	Hearsay - FRE 801 and 802		
460	Hearsay - FRE 801 and 802		
461	Hearsay - FRE 801 and 802		
462	Hearsay - FRE 801 and 802		
463	Hearsay - FRE 801 and 802		
464	Hearsay - FRE 801 and 802		
465	Helpfulness - FRE 702 and 703 Hearsay - FRE 801 and 802		
468	Hearsay - FRE 801 and 802		
469	Hearsay - FRE 801 and 802, format not viewable as exhibit		
472	Hearsay - FRE 801 and 802; relevance; foundation; authentication; reliability		
475	Hearsay - FRE 801 and 802; relevance; foundation; authentication; Reliability/FRE 703		

PX No.	Objection(s)	Sustained	Overruled
476	Helpfulness - FRE 702 and 703 Hearsay - FRE 801 and 802		
477	Hearsay - FRE 801 and 802		
478	Helpfulness - FRE 702 and 703 Hearsay - FRE 801 and 802		
479	Hearsay - FRE 801 and 802		
480	Hearsay - FRE 801 and 802		
485	Helpfulness - FRE 702 and 703 Hearsay - FRE 801 and 802		
486	Helpfulness - FRE 702 and 703 Hearsay - FRE 801 and 802		
487	Helpfulness - FRE 702 and 703 Hearsay - FRE 801 and 802		
488	Hearsay - FRE 801 and 802		
489	Hearsay - FRE 801 and 802		
490	Hearsay - FRE 801 and 802		
491	Hearsay - FRE 801 and 802		
492	Hearsay - FRE 801 and 802; foundation; Witness not on Disclosures, not on Plaintiffs' witness list, not designated as an expert, analysis not provided in discovery, not deposed		
493	Hearsay - FRE 801 and 802; Witness not on Disclosures, not on Plaintiffs' witness list, not designated as an expert, analysis not provided in discovery, not deposed		
494	Hearsay - FRE 801 and 802; Witness not on Disclosures, not designated as an expert, not on Plaintiffs' witness list; analysis not provided in discovery, not deposed		
495	Hearsay		
496	Hearsay		
498	Hearsay		

PX No.	Objection(s)	Sustained	Overruled
499	Hearsay - FRE 801 and 802		
500	Hearsay - FRE 801 and 802		
501	Helpfulness - FRE 702 and 703 Hearsay - FRE 801 and 802		
503	Helpfulness - FRE 702 and 703 Hearsay - FRE 801 and 802		
504	Hearsay - FRE 801 and 802		
505	Helpfulness - FRE 702 and 703 Hearsay - FRE 801 and 802		
507	Hearsay - FRE 801 and 802		
508	Hearsay - FRE 801 and 802		
509	Hearsay - FRE 801 and 802		
510	Hearsay - FRE 801 and 802		
511	Hearsay - FRE 801 and 802		
512	Hearsay - FRE 801 and 802		
513	Hearsay - FRE 801 and 802		
514	Hearsay - FRE 801 and 802		
515	Hearsay - FRE 801 and 802		
516	Hearsay - FRE 801 and 802		
519	Hearsay - FRE 801 and 802		
524	Object to description not matching bates number, should be DEFS00036199 (identified bates is a spreadsheet)		
525	Hearsay - FRE 801 and 802		
528	Hearsay - FRE 801 and 802		
531	Relevance		
532	Relevance		
533	Relevance		
534	Relevance		

PX No.	Objection(s)	Sustained	Overruled
535	Relevance		
536	Relevance		
539	Relevance		
540	Relevance		
563	Relevance		
564	Relevance		
565	Hearsay		
566	Hearsay		
567	Hearsay		
568	Hearsay, authentication, foundation, object to use of document not produced		
569	Hearsay; foundation; authentication		
570	Relevance		
571	Hearsay		
572	Authentication, foundation, hearsay		
573	Relevance, authentication, foundation		
574	Authentication, foundation		
575	Object to use of summary document as not previously produced, incomplete (does not include all maps)		
576	Relevance		
578	Hearsay		
580	Hearsay		

Signed on Galveston Island on this _____ day of _____, 2023

JEFFREY VINCENT BROWN
UNITED STATES DISTRICT JUDGE