

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

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

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

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

**JOINT MOTION OF NAACP PLAINTIFFS, PETTEWAY PLAINTIFFS, AND
DEFENDANTS TO SUPPLEMENT MOTION TO COMPEL
PRODUCTION OF DOCUMENTS**

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NAACP Plaintiffs and Petteway Plaintiffs (“Private Plaintiffs”) jointly move with Defendants to supplement their Joint Motion to Compel Production of Documents from Defendants, Doc. 102, to incorporate documents from Defendants’ Supplemental Privilege Log.¹ Ex. 1 (Supplemental Privilege Log). The list of documents, and the basis for challenging privilege assertions, is appended to this Motion in Exhibit 2. The Parties additionally request that the Court incorporate a document subject to claw-back notice by Defendants, DEFS00031696, *see* Ex. 3 (Defendants’ Letter Notifying Court of Additional Privileged Document); Ex. 4 (Plaintiffs’ Letter Responding to Same), as well as the four redacted Oldham/Bryan emails and the Bryan texts that have already been transmitted to the Court, *see* Ex. 6 (Joint Dispute Letter re email redactions); Ex. 7 (Joint Dispute Letter re text message redactions), as part of the Court’s consideration of the Motion to Compel at Doc. 102. Private Plaintiffs and Defendants respectfully request that the Court incorporate these documents into its ongoing *in camera* review of documents as part of its consideration of the Motion to Compel under consideration by the Court.

I. Procedural Background

On March 22, 2023, Defendants produced a handful of new documents in this matter that had not yet been produced. Defendants followed this production with a Supplemental Privilege Log on April 14, 2023. Ex. 1. Private Plaintiffs dispute the privilege assertions in 79 of these documents, as set forth in Exhibit 2 appended to this motion. Additionally, on

¹ As with the underlying motion, this is a non-dispositive motion and so the Court’s ruling is subject to a “clearly erroneous” standard. *Castillo v. Frank*, 70 F.3d 382, 385 (5th Cir. 1995).

March 31, 2023, Private Plaintiffs inquired with Defendants regarding several documents bates numbered DEFS00011236, DEFS00011258, DEFS00027884, and DEFS00027959 that were redacted based on attorney-client privilege. Private Plaintiffs raised the issue of the redactions to the Court at a discovery dispute hearing on April 12, 2023, where the Court agreed to review the redactions as a part of the larger Motion to Compel. *See* Minute Entry (April 12, 2023); Ex. 6.

Additionally, on April 12, 2023, Defendants issued a claw-back letter for one document produced on March 22, 2023, with bates number DEFS00031696. Private Plaintiffs notified Defendants they would dispute the privilege assertion over this document and the parties conferred on this issue on April 13, 2023. On April 14, 2023, Defendants issued a notice to the Court regarding this document and their position as to why the attorney-client privilege applies to this document and provided the document for *in camera* review. Exhibit 3. Private Plaintiffs also filed a notice of their position on why the attorney-client privilege does not apply to this document on April 14, 2023. Exhibit 4.

Finally, on April 18, 2023, Defendants produced a document with bates number DEFS00031806. Plaintiffs notified Defendants on April 18, 2023, that they would dispute the privilege assertions over the redactions contained in the productions, and the parties sent a joint letter to the Court stating their positions on the attorney-client privilege assertion. Ex. 7.

The parties agree to incorporate Private Plaintiffs' Challenges to 79 privilege assertions from Defendants' Supplemental Privilege Log, as well as document

DEFS00031696, the four redacted Oldham/Bryan emails and the Bryan texts that have already been transmitted to the Court, as part of the Court's consideration of the Motion to Compel at Doc. 102. Defendants have agreed to provide the challenged documents to the Court for *in camera* review concomitantly with the filing of this motion.

II. Legal Standard

The Parties incorporate by reference their respective statements of the applicable legal standards as set forth in the Private Plaintiffs' Motion to Compel (Doc. 102), Defendants' Response (Doc. 108), and Private Plaintiffs' Reply (Doc. 109).

III. Private Plaintiffs' Supplemental Argument

It is Private Plaintiffs' position that Defendants have inappropriately asserted attorney-client privilege over 79 documents in their Supplemental Privilege Log. *See* Ex. 2.

The bulk of newly challenged documents include those describing the drafting of Commissioner Court Precincts in 2011 and related data and analysis. These documents are not privileged as they do not serve the primary purpose of conveying legal advice; instead, they convey policy, political, technical, or strategic advice. *See, e.g., LULAC v. Abbott* ("*LULAC IV*"), 342 F.R.D. 227, 232 (W.D. Tex. 2022); Doc. 102 at 15–21. The mere decision to delegate map-drawing responsibilities to an attorney (or someone hired by an attorney) is not enough to establish that legal advice was the primary purpose of any communication. *See Ohio A. Philip Randolph Inst. v. Smith*, No. 1:18- CV-357, 2018 WL 6591622, at *4 (S.D. Ohio Dec. 15, 2018); *Freiermuth v. PPG Indus.*, 218 F.R.D. 694, 699

(N.D. Ala. 2003); *see also* Doc. 102 at 16.

Nor do Defendants include sufficient information about these map-related communications in their Supplemental Privilege Log to satisfy their burden of establishing privilege. Indeed, Defendants' descriptions for several of these documents do not even mention "legal advice" at all. *See, e.g.*, Ex. 1 at Doc ID 2867350 ("Communication from Galveston County redistricting counsel to Galveston County GIS engineer transmitting draft map csv files"); Doc ID 2896903 ("Communication from Galveston County redistricting counsel . . . re: new map proposal in response to published comments"); Doc ID 3130356 ("Communication from Galveston County redistricting counsel . . . re: map proposal 3 and accompanying data.").

The limited evidence that Defendants *have* disclosed casts doubt on any assertions that their withheld communications primarily concerned legal advice. One newly withheld document, Doc ID 2896903, has been otherwise produced to Plaintiffs in this matter as a later, forwarded, chain of emails. Ex. 5 (DEFS00031597, also produced by the United States at US0002221).² That email does not include anything resembling legal advice. Instead, attorney Trey Trainor notifies County Judge Mark Henry that he had "drafted a new plan" after reading a newspaper article and was sending the plan and related demographic analysis for his consideration. Ex. 5. There is no mention of any legal standards or review, nor is there any discussion of the potential legal consequences of the

² Private Plaintiffs have not challenged the privilege assertion over Doc ID 2896903 only because they already have a copy of this document and its attachments.

plan. In other words, the attorney in this email did not “run the legal” on the plan; he simply drafted and transmitted it, devoid of any legal advice. *See LULAC IV*, 342 F.R.D. at 236; *see also S.C. State Conf. of NAACP v. Alexander*, No. 21-CV-3302, 2022 WL 2375798 (D.S.C. Apr. 27, 2022) (email to attorney in redistricting case seeking “specific factual information” not privileged).

As this document makes clear, Defendants have misconstrued the attorney-client privilege as it applies in this matter and should thus be compelled to produce documents concerning the drafting and related demographic and other analysis of Commissioners Precincts in 2011 and 2021. To the extent there is any genuine legal advice included in any of these communications alongside the technical or policy-related information—which NAACP and Petteway Plaintiffs doubt—“redaction” of that legal advice “is the appropriate solution.” *LULAC v. Abbott* (“*LULAC P*”), No. EP-21-CV-00259-DCG-JES-JVB, 2022 WL 2921793, at *8–9, 13 (W.D. Tex. July 25, 2022). The attachments to these emails that draft maps and associated data, however, are themselves underlying facts not covered by the attorney-client privilege that should be produced regardless of any legal advice contained in the parent email. *See, e.g., Ohio A. Philip Randolph Inst.*, 2018 WL 6591622, at *3 (documents that “contain only facts, data, and maps . . . are not protected by the attorney client privilege” and must be produced); *see also* Doc. 102 at 21-22.

Another tranche of documents newly withheld include those concerning the form of the appropriate resolution to adopt a new map in 2011. These are procedural or strategic communications that resemble documents deemed non-privileged in a recent South

Carolina redistricting case because they primarily concerned “normal legislative business” or “legislative strategy.” *See, e.g., S.C. State Conf. of NAACP*, 2022 WL 2375798, at *4–7 (holding the following documents not privileged: (1) communications relating to outside counsel reviewing the state legislature’s “draft map room procedures,” as this was “normal legislative business”; (2) attorney approval of a draft text regarding the timing of when session would be called for redistricting, as this constituted “legislative strategy”; and (3) attorney advice to put up a “special order” to adopt a house resolution regarding redistricting maps, as this was “strategy as per procedural aspects of the special order”).

Of particular note here is Doc ID 2873023, an email from Nathan Sigler (the County’s GIS Engineer) to Mike Fitzgerald (the County’s GIS Supervisor): Neither is an attorney, nor does the email appear to merely be forwarding legal advice from an attorney (as both Sigler and Fitzgerald were copied earlier in the email chain). So, even if prior emails in this chain primarily contained legal advice, this particular email almost certainly does not. Similarly, exemplar orders from 2001 attached to many of these communications are certainly not privileged, as they would have been signed during a Commissioners Court meeting and shared publicly at that time.³

Finally, the clawed-back document, DEFS00031696, and the redactions in the four Oldham/Bryan emails and the Bryan texts that were transmitted to the Court are not

³ Private Plaintiffs incorporate by reference additional arguments supporting their privilege challenges to documents specified in Exhibit 2 as set forth in that document as well as Private Plaintiffs Motion to Compel, Doc. 102, and Reply in support of same, Doc. 109.

privileged for the reasons set forth in Private Plaintiffs’ Motion to Compel, the corresponding letters submitted to the Court on these issues, and those stated in the April 12, 2023, Hearing. Ex. 4 (DEFS00031696); Ex. 6 (Emails); Ex. 7 (Texts).

IV. Defendants’ Supplemental Argument

The attorney-client privilege protects communications between Galveston County and its attorneys where legal advice is sought or provided while preparing a legally compliant redistricting plan. Fighting this, Plaintiffs simply rehash the same tired, meritless arguments they have raised throughout this litigation. These arguments fail for the same reasons set forth in Defendants’ Oppositions to DOJ’s and Private Plaintiffs’ Motions to Compel, ECF Nos. 107, 108, the letters submitted to the court on the above-mentioned issues, and Defendants’ privilege claims specified in Exhibit 2, all of which Defendants incorporate by reference here. While those arguments apply equally to Plaintiffs’ supplemental argument here, Defendants wish to address some particular points.

Sufficiency: The Supplemental Privilege Log amply supports Defendants’ invocations of privilege. Plaintiffs’ complaints about “boilerplate” language, raised 11 times in their objection notes, are unsupported by law. Defendants’ privilege log identifies the individuals involved in the communication, the date of the communication, the subject matter of the communication, and provides an adequate description of the document. This is sufficient. *Carhartt, Inc. v. Innovative Textiles, Inc.*, 333 F.R.D. 118, 121 (E.D. Mich. 2019). The mere fact that they describe the documents as “advice” or “legal questions” do not render them insufficient. Those descriptions are not generic where, as here, they are

paired with detailed description of the context for court review.

Underlying Facts Exception: Plaintiffs continue their attempts to access attachments in the withheld communications via the underlying facts exception to the attorney-client privilege—but that exception does not apply here. Plaintiffs insist any maps attached to emails containing legal advice and requests for legal advice are *per se* not privileged. But written communications from a client to counsel *are* protected under the attorney-client privilege, because clients need to “*transfer relevant documents* to their attorneys” to “obtain fully informed legal advice.” *United States v. Davis*, 636 F.2d 1028, 1041 (5th Cir. 1981) (emphasis added). Documents included in communications from Defendants to counsel for this purpose are thus clearly privileged. This includes letters seeking legal advice, and all documents created by the attorney “that are within the normal ambit of the common-law attorney-client privilege[.]” *Id.* Defendants have carefully adhered to that principle in this litigation by including such attachments on their privilege log, including all draft maps created, analyzed, and revised within the attorney-client relationship for discussion between counsel and client.

All documents that are draft maps (including draft resolutions prepared for adopting them) fashioned within that relationship are privileged, despite Plaintiffs’ contention that underlying drafts are not privileged. These maps are protected because, as Defendants’ log sufficiently explains, the maps were born out of the attorney-client relationship, and they were rendered and revised in response to the client’s requests for legal analysis and input. This includes any data created inside the relationship as well, if it was shared as part of a

request (or in response to a request) for legal advice from a client.

Primary Purpose: For many of the same documents, Plaintiffs claim forty-five times that privilege does not attach because drafting maps is “quintessentially legislative.” These documents, per Plaintiffs, are not privileged because they purportedly serve the primary purpose of policy, political, technical, or strategic advice. That is incorrect on both the law and the reality of those documents.

First, the mere fact that legislators happen to consider technical, procedural, or strategic issues while also seeking the advice of counsel does not remove the privilege legislators enjoy while seeking or receiving advice of counsel. *Cf. Exxon Mobil Corp. v. Hill*, 751 F.3d 379, 382 (5th Cir. 2014) (holding memorandum could not be “mistaken for anything other than legal advice” where nothing showed counsel provided “business advice divorced from its legal implications”).

More fundamentally, many of these documents were prepared for the Commissioners Court as it was engaged in ongoing (or imminently anticipated) redistricting litigation with the Petteway Plaintiffs. The federal work product privilege protects documents prepared in anticipation of litigation or for trial. *In re Kaiser Aluminum & Chem. Co.*, 214 F.3d 586, 593 (5th Cir. 2000). And there is also no categorical exclusion of legislative documents from the work product doctrine. *See LULAC I*, 2022 U.S. Dist. LEXIS 131217 at *33-38 (rejecting categorical rule preventing legislators from asserting work-product protection). Additionally, the Fifth Circuit has extended work product privilege to instances where litigation is not imminent, so long as the “primary motivating

purpose behind the creation of the document was to aid in *possible* future litigation.” *Davis*, 636 F.2d at 1040 (emphasis added).

Documents created in the ordinary course of legislative business are not privileged, but the documents Plaintiffs want here are (as before) not ordinary. Rather, these documents were created in the already contentious and litigiously fraught context of 2021 AND 2011. Specifically, at the time the work product at issue here was prepared, redistricting litigation between many of the same Petteway plaintiffs and Galveston County was either imminently threatened or *ongoing*. See *Petteway v. Galveston County*, No. 3:13-cv-308 (S.D. Tex.), ECF No. 79 (final judgment entered Aug. 31, 2022); see also *Petteway v. Galveston County*, No. 3:11-cv-511 (S.D. Tex.), ECF No. 1 (complaint filed on November 14, 2011).

It strains credulity that future litigation was not the primary issue on the minds of the creators of these documents. All maps passed in 2011 were subject to mandatory preclearance by the DOJ. As such, the Commissioners Court retained redistricting counsel for that cycle in anticipation of litigation with the DOJ, which did in fact occur. At a minimum, these maps, including the draft resolutions prepared for adopting them, can “fairly be said to have been prepared or obtained because of the *prospect* of litigation.” 8 C. Wright and A. Miller, *Federal Practice and Procedure* § 2024 at 198 (1970) (emphasis added); see also *Davis*, 636 F.2d at 1040. And the record also demonstrates that Galveston County reasonably anticipated litigation during the time that draft maps and resolutions were prepared and considered for the 2021 redistricting cycle, meaning those documents

were prepared primarily to aid in future litigation.

V. Conclusion

As set forth above, the parties have agreed and hereby respectfully request that the Court incorporate Private Plaintiffs' Challenges to 79 privilege assertions from Defendants' Supplemental Privilege Log, as well as document DEFS00031696, the four redacted Oldham/Bryan emails and the Bryan texts that have already been transmitted to the Court, as part of the Court's consideration of the Motion to Compel at Doc. 102.

Respectfully submitted this 21st day of April, 2023.

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CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on April 21, 2023, the foregoing document was filed electronically (via CM/ECF), and that all counsel of record were served by CM/ECF.

/s/ Hilary Harris Klein

EXHIBIT 1

*Defendants' Supplemental April 14, 2023
Privilege Log*

Document Id	Document Type	Family Date	Date (DISCO Date)	Subject	Plg Attachment Names	Def To Supplemental Privilege	Prong (4-14-2023)	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
2434381	Email	3/23/2011 10:15 AM	3/23/2011 10:15 AM	FW: Redistricting		Sigler, Nathan <Nathan.Sigler@co.galveston.tx.us>	Fitzgerald, Mike <Mike.Fitzgerald@co.galveston.tx.us>			FW Redistricting.msg		Attorney-Client	Communication from Galveston County GIS official to Galveston County GIS engineer relaying communication from Galveston County Attorney to County Judge Mark Henry, and Galveston County GIS employees relaying advice from Bickerstaff lawyers re: redistricting process and what is needed to conduct the redistricting process.
3146188	Email	4/7/2011 3:12 PM	4/7/2011 3:12 PM	Redistricting Questions		Clark, Ken <Ken.Clark@co.galveston.tx.us>; Henry, Mark <Mark.Henry@co.galveston.tx.us>; Bazaman, Harvey <Harvey.Bazaman@co.galveston.tx.us>	Bazaman, Harvey <Harvey.Bazaman@co.galveston.tx.us>			Redistricting Questions.msg		Attorney-Client	Communication from Galveston County attorney to Commissioner Clark and County Judge Henry answering legal questions and providing legal advice.
3148876	Pdf	4/7/2011 3:12 PM	4/7/2011 10:09 AM							Scan001.PDF		Attorney-Client	Copy of Texas Constitution and Treatise attached to Communication from Galveston County attorney to Commissioner Clark and County Judge Henry answering legal questions and providing legal advice.
3157467	Email	5/13/2011 11:34 AM	5/13/2011 11:34 AM	URGENT Redistricting Engagement Letter		Henry, Mark <Mark.Henry@co.galveston.tx.us>; Doyle, Patrick <Patrick.Doyle@co.galveston.tx.us>; O'Brien, Kevin <Kevin.O'Brien@co.galveston.tx.us>; Gilliam, Cindy <Cindy.Gilliam@co.galveston.tx.us>; Holmes, Stephen <Stephen.Holmes@co.galveston.tx.us>; Clark, Ken <Ken.Clark@co.galveston.tx.us>; Mabry, Celia-Frances <Celia-Frances.Mabry@co.galveston.tx.us>; Bazaman, Harvey <Harvey.Bazaman@co.galveston.tx.us>	Bazaman, Harvey <Harvey.Bazaman@co.galveston.tx.us>			URGENT Redistricting Engagement Letter.msg		Attorney-Client	Communication from Galveston County attorney to Judge Henry, Galveston County Commissioners, and Galveston County employees regarding a draft engagement letter for legal representation related to Commissioners Court redistricting.
3161449	Pdf	5/13/2011 11:34 AM	5/13/2011 6:32 AM							Scan001.PDF		Attorney-Client	Draft engagement letter attached in communication from Galveston County attorney to Judge Henry, Galveston County Commissioners, and Galveston County employees.
3137345	Email	5/13/2011 4:09 PM	5/13/2011 4:09 PM	Commissioner Holmes' Comments to Biene's Engagement Letter		Henry, Mark <Mark.Henry@co.galveston.tx.us>; Doyle, Patrick <Patrick.Doyle@co.galveston.tx.us>; O'Brien, Kevin <Kevin.O'Brien@co.galveston.tx.us>; Gilliam, Cindy <Cindy.Gilliam@co.galveston.tx.us>; Holmes, Stephen <Stephen.Holmes@co.galveston.tx.us>; Clark, Ken <Ken.Clark@co.galveston.tx.us>; Mabry, Celia-Frances <Celia-Frances.Mabry@co.galveston.tx.us>; Bazaman, Harvey <Harvey.Bazaman@co.galveston.tx.us>	Bazaman, Harvey <Harvey.Bazaman@co.galveston.tx.us>			Commissioner Holmes' Comments to Biene's Engagement Letter.msg		Attorney-Client	Communication from Galveston County attorney to Judge Henry, Galveston County Commissioners, and Galveston County employees regarding a draft engagement letter for legal representation related to Commissioners Court redistricting.
3138233	Pdf	5/13/2011 4:09 PM	5/13/2011 11:08 AM							Scan001.PDF		Attorney-Client	Draft engagement letter attached in communication from Galveston County attorney to Judge Henry, Galveston County Commissioners, and Galveston County employees.

Document Id	Document Type	Family Date	Date (DISCO Date)	Subject	Plg Attachment Names	Def/Plg	Supplemental Privilege Log (4-14-2023)	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
3144152	Email	5/15/2011 1:19 PM	5/15/2011 1:19 PM	RE: Biene's Engagement Letter			Bazaman, Harvey <Harvey.Bazaman@co.galveston.tx.us>; Henry, Mark <Mark.Henry@co.galveston.tx.us>; Doyle, Patrick <Patrick.Doyle@co.galveston.tx.us>; O'Brien, Kevin <Kevin.O'Brien@co.galveston.tx.us>; Gilliam, Cindy <Cindy.Gilliam@co.galveston.tx.us>; Holmes, Stephen <Stephen.Holmes@co.galveston.tx.us>; Clark, Ken <Ken.Clark@co.galveston.tx.us>; Mabry, Celia-Frances <Celia-Frances.Mabry@co.galveston.tx.us>			RE Biene's Engagement Letter.msg		Attorney-Client	Communication from Galveston County attorney to Judge Henry, Galveston County Commissioners, and Galveston County employees regarding a draft engagement letter for legal representation related to Commissioners Court redistricting.
3146394	Word	5/15/2011 1:19 PM	5/15/2011 1:16 PM							Nixon Retention Letter Second Draft.doc		Attorney-Client	Draft engagement letter attached in communication from Galveston County attorney to Judge Henry, Galveston County Commissioners, and Galveston County employees.
2867350	Email	7/15/2011 2:32 PM	7/15/2011 2:32 PM	Galveston County .csv files			Sigler, Nathan <nathan.sigler@co.galveston.tx.us>	Trainor, Trey <ttrainor@bmplp.com>		Galveston County .csv files.msg		Attorney-Client	Communication from Galveston County redistricting counsel to Galveston County GIS engineer transmitting draft map csv files.
2867860	Text	7/15/2011 2:32 PM	12/31/9999 6:00 PM							Existing 2011 Galveston County Commissioner Court Districts.csv		Attorney-Client	Attached .csv file in communication from Galveston County redistricting counsel to Galveston County GIS engineer transmitting draft map csv files.
2867876	Text	7/15/2011 2:32 PM	12/31/9999 6:00 PM							Galveston County Commissioner Court Districts Proposal 2 07-07-11.csv		Attorney-Client	Attached .csv file in communication from Galveston County redistricting counsel to Galveston County GIS engineer transmitting draft map csv files.
2867865	Text	7/15/2011 2:32 PM	12/31/9999 6:00 PM							Galveston County JP Districts Proposal 1 07-07-11.csv		Attorney-Client	Attached .csv file in communication from Galveston County redistricting counsel to Galveston County GIS engineer transmitting draft map csv files.
2867870	Text	7/15/2011 2:32 PM	12/31/9999 6:00 PM							Galveston County Commissioner Court Districts Proposal 1 07-07-11.csv		Attorney-Client	Attached .csv file in communication from Galveston County redistricting counsel to Galveston County GIS engineer transmitting draft map csv files.
3082742	Email	8/4/2011 5:12 PM	8/4/2011 5:12 PM	Engagement Letter			Reingold, Myrna <Myrna.Reingold@co.galveston.tx.us>	Chapman, Brandy <Brandy.Chapman@co.galveston.tx.us>		Engagement Letter.msg		Attorney-Client	Communication from Galveston County Deputy Clerk to Galveston County attorney summarizing and analyzing Commissioners Court meeting items relating to redistricting of Commissioners Court precincts.
3085718	Pdf	8/4/2011 5:12 PM	8/4/2011 5:26 PM							Scan001.pdf		Attorney-Client	Attachment of engagement letter in communication from Galveston County Deputy Clerk to Galveston County attorney summarizing and analyzing Commissioners Court meeting items relating to redistricting of Commissioners Court precincts.
2896903	Email	8/29/2011 1:01 PM	8/29/2011 1:01 PM	Updated map based on news report/public comment			Henry, Mark <Mark.Henry@co.galveston.tx.us>	Trainor, Trey <ttrainor@bmplp.com>	Doyle, Patrick <Patrick.Doyle@co.galveston.tx.us>; O'Brien, Kevin <Kevin.O'Brien@co.galveston.tx.us>; Holmes, Stephen <Stephen.Holmes@co.galveston.tx.us>; Clark, Ken <Ken.Clark@co.galveston.tx.us>; Sigler, Nathan <Nathan.Sigler@co.galveston.tx.us>	Updated map based on news report/public comment.msg		Attorney-Client	Communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.
2899101	Cad	8/29/2011 1:01 PM	12/31/9999 6:00 PM							JP Proposal.shx		Attorney-Client	Attached shapefile of draft JP proposal to Communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.

Document Id	Document Type	Family Date	Date (DISCO Date)	Subject	Plg Attachment Names	Def/Supplemental Privilege/Prong (4-14-2023)	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
2899048	Cad	8/29/2011 1:01 PM	12/31/9999 6:00 PM						JP Proposal.shp		Attorney-Client	Attached shapefile of JP Proposal attached to Communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.
2899069	Text	8/29/2011 1:01 PM	12/31/9999 6:00 PM						Commissioner Proposal 1A.prj,JP Proposal.prj		Attorney-Client	Attached shapefile of JP Proposal attached to Communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.
2899058	Image	8/29/2011 1:01 PM	12/31/9999 6:00 PM						JP Proposal 1A.jpg		Attorney-Client	Attached jpg image of JP Proposal attached to Communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.
2899121	Image	8/29/2011 1:01 PM	12/31/9999 6:00 PM						Proposal 1A.jpg		Attorney-Client	Attached Commissioner Court Jpg image of Commissioner Court Proposal attached to Communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.
2899084	Cad	8/29/2011 1:01 PM	12/31/9999 6:00 PM						Commissioner Proposal 1A.shx		Attorney-Client	Attached Commissioner Court shapefile of Commissioner Court Proposal attached to Communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.
2899024	Pdf	8/29/2011 1:01 PM	12/31/9999 6:00 PM						Population data for commissioner district proposals - Galveston County.pdf		Attorney-Client	Attached Commissioner Court population data and demographic data of Commissioner Court Proposal attached to Communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.
2899035	Cad	8/29/2011 1:01 PM	12/31/9999 6:00 PM						Commissioner Proposal 1A.shp		Attorney-Client	Attached Commissioner Court shapefile of Commissioner Court Proposal attached to Communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.
2895905	Email	8/29/2011 1:28 PM	8/29/2011 1:28 PM	FW: Updated map based on news report/public comment			Fitzgerald, Mike <Mike.Fitzgerald@co.galveston.tx.us>		FW Updated map based on news report/public comment.msg	Sigler, Nathan <Nathan.Sigler@co.galveston.tx.us>	Attorney-Client	Communication from Galveston County GIS Engineer to Galveston County GIS supervisor forwarding both attachments and communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.
2896795	Text	8/29/2011 1:28 PM	12/31/9999 6:00 PM						Commissioner Proposal 1A.prj,JP Proposal.prj		Attorney-Client	Attachment of .txt data in communication from Galveston County GIS Engineer to Galveston County GIS supervisor forwarding communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.

Document Id	Document Type	Family Date	Date (DISCO Date)	Subject	Plg Attachment Names	Def/Plg Supplemental Privilege Form (4-14-2023)	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
2897806	Cad	8/29/2011 1:28 PM	12/31/9999 6:00 PM						JP Proposal.shp		Attorney-Client	Attachment of .cad file in communication from Galveston County GIS Engineer to Galveston County GIS supervisor forwarding communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.
2897645	Cad	8/29/2011 1:28 PM	12/31/9999 6:00 PM						Commissioner Proposal 1A.shp		Attorney-Client	Attachment of .cad file in communication from Galveston County GIS Engineer to Galveston County GIS supervisor forwarding communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.
2897509	Cad	8/29/2011 1:28 PM	12/31/9999 6:00 PM						JP Proposal.shx		Attorney-Client	Attachment of .cad file in communication from Galveston County GIS Engineer to Galveston County GIS supervisor forwarding communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.
2897199	Pdf	8/29/2011 1:28 PM	12/31/9999 6:00 PM						Population data for commissioner district proposals - Galveston County.pdf		Attorney-Client	PDF attachment in communication from Galveston County GIS Engineer to Galveston County GIS supervisor forwarding communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.
2897357	Image	8/29/2011 1:28 PM	12/31/9999 6:00 PM						JP Proposal 1A.jpg		Attorney-Client	Attachment of .jpg image in communication from Galveston County GIS Engineer to Galveston County GIS supervisor forwarding communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.
2896926	Cad	8/29/2011 1:28 PM	12/31/9999 6:00 PM						Commissioner Proposal 1A.shx		Attorney-Client	Attachment of .cad file in communication from Galveston County GIS Engineer to Galveston County GIS supervisor forwarding communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.
2897059	Image	8/29/2011 1:28 PM	12/31/9999 6:00 PM						Proposal 1A.jpg		Attorney-Client	Attachment of .jpg image in communication from Galveston County GIS Engineer to Galveston County GIS supervisor forwarding communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.
2872068	Email	8/29/2011 2:10 PM	8/29/2011 2:10 PM	RE: Updated map based on news report/public comment			Holmes, Stephen <Stephen.Holmes@co.galveston.tx.us> Doyle, Patrick <Patrick.Doyle@co.galveston.tx.us>		RE Updated map based on news reportpublic comment.msg		Attorney-Client	Communication from Commissioner Doyle to Commissioner Holmes, commenting on communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.

Document Id	Document Type	Family Date	Date (DISCO Date)	Subject	Plg Attachment Names	Def(s)	Supplemental Privilege Log (4-14-2023)	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
3248345	Email	8/29/2011 3:11 PM	8/29/2011 3:11 PM	FW: Updated map based on news report/public comment	commissionerholmes@verizon.net	Holmes, Stephen	<Stephen.Holmes@co.galveston.tx.us>			FW Updated map based on news report/public comment.msg		Attorney-Client	Communication from Commissioner Holmes to Commissioner Holmes's personal email account forwarding Communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.
3248780	Pdf	8/29/2011 3:11 PM	12/31/9999 6:00 PM							Population data for commissioner district proposals - Galveston County.pdf		Attorney-Client	PDF attachment in communication from Commissioner Holmes to Commissioner Holmes's personal email account forwarding communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.
3248783	Image	8/29/2011 3:11 PM	12/31/9999 6:00 PM							Proposal 1A.jpg		Attorney-Client	Attachment of .jpg image in communication from Commissioner Holmes to Commissioner Holmes's personal email account forwarding communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.
3248773	Text	8/29/2011 3:11 PM	12/31/9999 6:00 PM							Commissioner Proposal 1A.prj;JP Proposal.prj		Attorney-Client	Attachment of .txt data in communication from Commissioner Holmes to Commissioner Holmes's personal email account forwarding communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.
3248789	Cad	8/29/2011 3:11 PM	12/31/9999 6:00 PM							JP Proposal.shp		Attorney-Client	Attachment of .cad file in communication from Commissioner Holmes to Commissioner Holmes's personal email account forwarding communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.
3248787	Cad	8/29/2011 3:11 PM	12/31/9999 6:00 PM							Commissioner Proposal 1A.shp		Attorney-Client	Attachment of .cad file in communication from Commissioner Holmes to Commissioner Holmes's personal email account forwarding communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.
3248790	Cad	8/29/2011 3:11 PM	12/31/9999 6:00 PM							Commissioner Proposal 1A.shx		Attorney-Client	Attachment of .cad file in communication from Commissioner Holmes to Commissioner Holmes's personal email account forwarding communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.
3248782	Image	8/29/2011 3:11 PM	12/31/9999 6:00 PM							JP Proposal 1A.jpg		Attorney-Client	Attachment of .jpg image in communication from Commissioner Holmes to Commissioner Holmes's personal email account forwarding communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.

Document Id	Document Type	Family Date	Date (DISCO Date)	Subject	Plg Attachment Names	Def To Supplemental Privilege (4-14-2023)	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
3248784	Cad	8/29/2011 3:11 PM	12/31/9999 6:00 PM						JP Proposal.shx		Attorney-Client	Attachment of .cad file in communication from Commissioner Holmes to Commissioner Holmes's personal email account forwarding communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.
3132914	Email	8/29/2011 3:58 PM	8/29/2011 3:58 PM	FW: Updated map based on news report/public comment		clarkken@juno.com	Clark, Ken <Ken.Clark@co.galveston.tx.us>		FW Updated map based on news report/public comment.msg		Attorney-Client	Commissioner Clark forwarding to his personal email account both attachments and communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.
3134433	Cad	8/29/2011 3:58 PM	12/31/9999 6:00 PM						Commissioner Proposal 1A.shp		Attorney-Client	Attachment of .cad file in communication from Commissioner Clark forwarding to his personal email account both attachments and communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.
3134235	Text	8/29/2011 3:58 PM	12/31/9999 6:00 PM						JP Proposal.prj;Commissioner Proposal 1A.prj		Attorney-Client	Attachment of .txt data in communication from Commissioner Clark forwarding to his personal email account both attachments and communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.
3134316	Image	8/29/2011 3:58 PM	12/31/9999 6:00 PM						JP Proposal 1A.jpg		Attorney-Client	Attachment of .jpg image in communication from Commissioner Clark forwarding to his personal email account both attachments and communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.
3134293	Pdf	8/29/2011 3:58 PM	12/31/9999 6:00 PM						Population data for commissioner district proposals - Galveston County.pdf		Attorney-Client	PDF attachment in communication from Commissioner Clark forwarding to his personal email account both attachments and communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.
3134401	Cad	8/29/2011 3:58 PM	12/31/9999 6:00 PM						JP Proposal.shp		Attorney-Client	Attachment of .cad file in communication from Commissioner Clark forwarding to his personal email account both attachments and communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.
3134342	Cad	8/29/2011 3:58 PM	12/31/9999 6:00 PM						JP Proposal.shx		Attorney-Client	Attachment of .cad file in communication from Commissioner Clark forwarding to his personal email account both attachments and communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.

Document Id	Document Type	Family Date	Date (DISCO Date)	Subject	Plg Attachment Names	Def(s)	Supplemental Privilege Log (4-14-2023)	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
3134370	Cad	8/29/2011 3:58 PM	12/31/9999 6:00 PM							Commissioner Proposal 1A.shx		Attorney-Client	Attachment of .cad file in communication from Commissioner Clark forwarding to his personal email account both attachments and communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.
3134261	Image	8/29/2011 3:58 PM	12/31/9999 6:00 PM							Proposal 1A.jpg		Attorney-Client	Attachment of .jpg image in communication from Commissioner Clark forwarding to his personal email account both attachments and communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.
3130356	Email	8/29/2011 5:17 PM	8/29/2011 5:17 PM	Pproposal 3 population data		Henry, Mark <Mark.Henry@co.galveston.tx.us>	Trainor, Trey <ttrainor@bmpllp.com>	O'Brien, Kevin <Kevin.O'Brien@co.galveston.tx.us>;Doyle, Patrick <Patrick.Doyle@co.galveston.tx.us>;Clark, Ken <Ken.Clark@co.galveston.tx.us>;Holmes, Stephen <Stephen.Holmes@co.galveston.tx.us>		Proposal 3 population data.msg		Attorney-Client	Communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, re: map proposal 3 and accompanying data.
3131025	Pdf	8/29/2011 5:17 PM	12/31/9999 6:00 PM							Population data for commissioner proposal 3 - Galveston County.pdf		Attorney-Client	Attachment, population and demographic data; communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, re: map proposal 3 and accompanying data.
3096786	Email	9/2/2011 12:30 PM	9/2/2011 12:30 PM	Redistricting Resolutions		Chapman, Brandy <Brandy.Chapman@co.galveston.tx.us>;Nixon, Joe <jnixon@bmpllp.com>;Trainor, Trey <ttrainor@bmpllp.com>	Bazaman, Harvey <Harvey.Bazaman@co.galveston.tx.us>	Henry, Mark <Mark.Henry@co.galveston.tx.us>;Doyle, Patrick <Patrick.Doyle@co.galveston.tx.us>;O'Brien, Kevin <Kevin.O'Brien@co.galveston.tx.us>;Gilliam, Cindy <Cindy.Gilliam@co.galveston.tx.us>;Holmes, Stephen <Stephen.Holmes@co.galveston.tx.us>;Clark, Ken <Ken.Clark@co.galveston.tx.us>;Mabry, Celia-Frances <Celia-Frances.Mabry@co.galveston.tx.us>		Redistricting Resolutions.msg		Attorney-Client	Communication from Galveston County attorney to Galveston County redistricting counsel, Galveston County chief deputy clerk, with a copy to the Galveston County commissioners re: legal requirements/templates for drafting redistricting resolutions/orders for the county to adopt.
3097887	Word	9/2/2011 12:30 PM	11/7/2001 3:42 PM							JP and Constable Final Resolution November 5.doc	CLAUDIA	Attorney-Client	Attachment: 2001 JP and Constable final resolution adopting redistricting plan, communication from Galveston County attorney to Galveston County redistricting counsel, Galveston County chief deputy clerk, with a copy to the Galveston County commissioners re: legal requirements/templates for drafting redistricting resolutions/orders for the county to adopt.
3097878	Word	9/2/2011 12:30 PM	10/9/2001 1:35 PM							Commissioners Resolution Final Oct. 8.doc	CLAUDIA	Attorney-Client	Attachment: 2001 Commissioner Court final resolution adopting redistricting plan, communication from Galveston County attorney to Galveston County redistricting counsel, Galveston County chief deputy clerk, with a copy to the Galveston County commissioners re: legal requirements/templates for drafting redistricting resolutions/orders for the county to adopt.

Document Id	Document Type	Family Date	Date (DISCO Date)	Subject	Plg Attachment Names	Def	Supplemental Privilege Log (4-14-2023)	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
2865149	Email	9/7/2011 2:26 PM	9/7/2011 2:26 PM	FW: Redistricting Resolutions		Fitzgerald, Mike <Mike.Fitzgerald@co.galveston.tx.us>	Chapman, Brandy <Brandy.Chapman@co.galveston.tx.us>			FW Redistricting Resolutions.msg		Attorney-Client	Communication from Galveston County chief deputy clerk to Galveston County GIS Engineer and GIS Supervisor relaying both attachments and communication from Galveston County attorney to Galveston County redistricting counsel. Galveston County chief deputy clerk, with a copy to the Galveston County commissioners re: legal requirements/templates for drafting redistricting resolutions/orders for the county to adopt.
2866176	Word	9/7/2011 2:26 PM	11/7/2001 3:42 PM							JP and Constable Final Resolution November 5.doc	CLAUDIA	Attorney-Client	Attachment of the 2001 Commissioner Court final resolution adopting redistricting plan in communication from Galveston County attorney to Galveston County redistricting counsel, Galveston County chief deputy clerk, with a copy to the Galveston County commissioners re: legal requirements/templates for drafting redistricting resolutions/orders for the county to adopt.
2866175	Word	9/7/2011 2:26 PM	10/9/2001 1:35 PM							Commissioners Resolution Final Oct. 8.doc	CLAUDIA	Attorney-Client	Attachment of the 2001 Commissioner Court final resolution adopting redistricting plan in communication from Galveston County attorney to Galveston County redistricting counsel, Galveston County chief deputy clerk, with a copy to the Galveston County commissioners re: legal requirements/templates for drafting redistricting resolutions/orders for the county to adopt.
2873023	Email	9/7/2011 2:31 PM	9/7/2011 2:31 PM	FW: Redistricting Resolutions		Fitzgerald, Mike <Mike.Fitzgerald@co.galveston.tx.us>	Sigler, Nathan <Nathan.Sigler@co.galveston.tx.us>			FW Redistricting Resolutions.msg		Attorney-Client	Communication from Galveston County GIS Engineer to Galveston County GIS Supervisor relaying attachments and communication from Galveston County attorney to Galveston County redistricting counsel, Galveston County chief deputy clerk, with a copy to the Galveston County commissioners re: legal requirements/templates for drafting redistricting resolutions/orders for the county to adopt.
2873863	Word	9/7/2011 2:31 PM	10/9/2001 1:35 PM							Commissioners Resolution Final Oct. 8.doc	CLAUDIA	Attorney-Client	Attachment of the 2001 Commissioner Court final resolution adopting redistricting plan in communication from Galveston County GIS Engineer to Galveston County GIS Supervisor relaying attachments and communication from Galveston County attorney to Galveston County redistricting counsel, Galveston County chief deputy clerk, with a copy to the Galveston County commissioners re: legal requirements/templates for drafting redistricting resolutions/orders for the county to adopt.
2873848	Word	9/7/2011 2:31 PM	11/7/2001 3:42 PM							JP and Constable Final Resolution November 5.doc	CLAUDIA	Attorney-Client	Attachment of the 2001 Commissioner Court final resolution adopting redistricting plan in communication from Galveston County GIS Engineer to Galveston County GIS Supervisor relaying attachments and communication from Galveston County attorney to Galveston County redistricting counsel, Galveston County chief deputy clerk, with a copy to the Galveston County commissioners re: legal requirements/templates for drafting redistricting resolutions/orders for the county to adopt.

Document Id	Document Type	Family Date	Date (DISCO Date)	Subject	Plg Attachment Names	Def(s)	Supplemental Privilege Log (4-14-2023)	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
3094248	Email	9/12/2011 3:43 PM	9/12/2011 3:43 PM	FW: Redistricting Resolutions		pnuckolls@bmplp.com	Chapman, Brandy <Brandy.Chapman@co.galveston.tx.us>			FW Redistricting Resolutions.msg		Attorney-Client	Communication from Galveston County Chief Deputy Clerk to Galveston County Redistricting Counsel's paralegal relaying both attachments and communication from Galveston County attorney to Galveston County redistricting counsel, Galveston County chief deputy clerk, with a copy to the Galveston County commissioners re: legal requirements/templates for drafting redistricting resolutions/orders for the county to adopt.
3095433	Word	9/12/2011 3:43 PM	11/7/2001 3:42 PM							JP and Constable Final Resolution November 5.doc	CLAUDIA	Attorney-Client	Attachment of the 2001 Commissioner Court final resolution adopting redistricting plan in communication from Galveston County Chief Deputy Clerk to Galveston County Redistricting Counsel's paralegal relaying both attachments and communication from Galveston County attorney to Galveston County redistricting counsel, Galveston County chief deputy clerk, with a copy to the Galveston County commissioners re: legal requirements/templates for drafting redistricting resolutions/orders for the county to adopt.
3095435	Word	9/12/2011 3:43 PM	10/9/2001 1:35 PM							Commissioners Resolution Final Oct. 8.doc	CLAUDIA	Attorney-Client	Attachment of the 2001 Commissioner Court final resolution adopting redistricting plan in communication from Galveston County Chief Deputy Clerk to Galveston County Redistricting Counsel's paralegal relaying both attachments and communication from Galveston County attorney to Galveston County redistricting counsel, Galveston County chief deputy clerk, with a copy to the Galveston County commissioners re: legal requirements/templates for drafting redistricting resolutions/orders for the county to adopt.
3098298	Email	10/7/2011 9:30 AM	10/7/2011 9:30 AM	FW: Redistricting Resolutions		Grady, Patricia <Patricia.Grady@co.galveston.tx.us>	Chapman, Brandy <Brandy.Chapman@co.galveston.tx.us>			FW Redistricting Resolutions.msg		Attorney-Client	Communication from Deputy Galveston County Clerk to Galveston County attorney relaying attachments and communication from Galveston County attorney to Galveston County redistricting counsel, Galveston County chief deputy clerk, with a copy to the Galveston County commissioners re: legal requirements/templates for drafting redistricting resolutions/orders for the county to adopt.
3099225	Word	10/7/2011 9:30 AM	11/7/2001 3:42 PM							JP and Constable Final Resolution November 5.doc	CLAUDIA	Attorney-Client	Attachment of 2001 order adopting Justice of the Peace precincts in communication from Deputy Galveston County Clerk to Galveston County attorney relaying attachments and communication from Galveston County attorney to Galveston County redistricting counsel, Galveston County chief deputy clerk, with a copy to the Galveston County commissioners re: legal requirements/templates for drafting redistricting resolutions/orders for the county to adopt.
3099303	Word	10/7/2011 9:30 AM	10/9/2001 1:35 PM							Commissioners Resolution Final Oct. 8.doc	CLAUDIA	Attorney-Client	Attachment of 2001 order adopting Commissioners Court precincts in communication from Deputy Galveston County Clerk to Galveston County attorney relaying attachments and communication from Galveston County attorney to Galveston County redistricting counsel, Galveston County chief deputy clerk, with a copy to the Galveston County commissioners re: legal requirements/templates for drafting redistricting resolutions/orders for the county to adopt.

Document Id	Document Type	Family Date	Date (DISCO Date)	Subject	Plg Attachment Names	Def(s)	Supplemental Privilege Log (4-14-2023)	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
3271781	Email	10/7/2011 3:17 PM	10/7/2011 3:17 PM	FW: Documents as per your request this morning		Lewis, Roxann <Roxann.Lewis@co.galveston.tx.us>	Grady, Patricia <Patricia.Grady@co.galveston.tx.us>			FW Documents as per your request this morning.msg		Attorney-Client	Communication from Galveston County legal liaison to Judge Henry and Judge Henry's executive assistant forwarding draft documents from redistricting counsel and inquiring whether the documents are signable.
3272762	Pdf	10/7/2011 3:17 PM	12/31/9999 6:00 PM							Galveston County Redistricting Order.pdf		Attorney-Client	Attached draft order to communication from Galveston County legal liaison to Judge Henry and Judge Henry's executive assistant forwarding draft documents from redistricting counsel and inquiring whether the documents are signable.
3272760	Pdf	10/7/2011 3:17 PM	12/31/9999 6:00 PM							Galveston County JP Redistricting.pdf		Attorney-Client	Attached draft Commissioners Court Order to communication from Galveston County legal liaison to Judge Henry and Judge Henry's executive assistant forwarding draft documents from redistricting counsel and inquiring whether the documents are signable.
3264237	Email	11/22/2011 8:39 AM	11/22/2011 8:39 AM	Fwd: show_temp[1]		Mark Henry <mark@talonaire.com>	Henry, Mark <Mark.Henry@co.galveston.tx.us>			Fwd show_temp[1].msg		Attorney-Client;Work-Product	Communication from redistricting counsel to Judge Henry, and Judge Henry forwarding communication to himself, regarding court order in Petteway litigation.
3264705	Pdf	11/22/2011 8:39 AM	11/22/2011 8:09 AM							show_temp[1].pdf	ccarnew	Attorney-Client;Work-Product	Attached court order to communication from redistricting counsel to Judge Henry, and Judge Henry forwarding communication to himself, regarding court order in Petteway litigation.
3264628	Html	11/22/2011 8:39 AM	12/31/9999 6:00 PM							ATT6652156.htm		Attorney-Client	Attached .htm file in communication from redistricting counsel to Judge Henry, and Judge Henry forwarding communication to himself, regarding court order in Petteway litigation.
3269366	Email	11/22/2011 8:39 AM	11/22/2011 8:39 AM	Fwd: show_temp[2]		Mark Henry <mark@talonaire.com>	Henry, Mark <Mark.Henry@co.galveston.tx.us>			Fwd show_temp[2].msg		Attorney-Client	Communication from Judge Henry to his own email address forwarding a communication from redistricting counsel to Judge Henry, and copying Galveston County attorney, re: legal analysis of court order in Petteway litigation.
3269941	Html	11/22/2011 8:39 AM	12/31/9999 6:00 PM							ATT6652619.htm		Attorney-Client	Attachment of .htm data in communication from Judge Henry to his own email address forwarding a communication from redistricting counsel to Judge Henry, and copying Galveston County attorney, re: legal analysis of court order in Petteway litigation.
3269943	Pdf	11/22/2011 8:39 AM	11/22/2011 8:07 AM							show_temp[2].pdf	ccarnew	Attorney-Client	Attachment of court order in communication from Judge Henry to his own email address forwarding a communication from redistricting counsel to Judge Henry, and copying Galveston County attorney, re: legal analysis of court order in Petteway litigation.
3267501	Email	11/22/2011 8:40 AM	11/22/2011 8:40 AM	show_temp[1]		Henry, Mark <Mark.Henry@co.galveston.tx.us>	Nixon, Joe <jnixon@bmpilp.com>	Trainor, Trey <trainor@bmpilp.com>; dloesa@aol.com;Adams, Terry <tadams@bmpilp.com>		show_temp[1].msg		Attorney-Client	Communication from redistricting counsel to Judge Henry, and copying Galveston County attorney and other redistricting counsel, requesting callback re: court order in Petteway litigation.
3268318	Pdf	11/22/2011 8:40 AM	11/22/2011 8:09 AM							show_temp[1].pdf	ccarnew	Attorney-Client	Attachment of court order in communication from redistricting counsel to Judge Henry, and copying Galveston County attorney and other redistricting counsel, requesting callback re: court order in Petteway litigation.
3267274	Email	11/22/2011 8:42 AM	11/22/2011 8:42 AM	show_temp[2]		Henry, Mark <Mark.Henry@co.galveston.tx.us>	Nixon, Joe <jnixon@bmpilp.com>	Trainor, Trey <trainor@bmpilp.com>; Adams, Terry <tadams@bmpilp.com>; dloesa@aol.com		show_temp[2].msg		Attorney-Client	Communication from redistricting counsel to Judge Henry, and copying Galveston County attorney and other redistricting counsel, providing legal analysis of court order in Petteway litigation.
3267670	Pdf	11/22/2011 8:42 AM	11/22/2011 8:07 AM							show_temp[2].pdf	ccarnew	Attorney-Client	Attachment of court order in communication from redistricting counsel to Judge Henry, and copying Galveston County attorney and other redistricting counsel, providing legal analysis of court order in Petteway litigation.

Document Id	Document Type	Family Date	Date (DISCO Date)	Subject	Plg Attachment Names	Def(s)	Supplemental Privilege	Frng (4-14-2023)	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
3266768	Email	11/22/2011 8:42 AM	11/22/2011 8:42 AM	FW: show_temp[1]		Grady, Patricia <Patricia.Grady@co.galveston.tx.us>		Henry, Mark <Mark.Henry@co.galveston.tx.us>			FW show_temp[1].msg		Attorney-Client	Communication from Judge Henry to Galveston County attorney forwarding communication from redistricting counsel to Judge Henry, and copying Galveston County attorney and other redistricting counsel, providing legal analysis of court order in Petteway litigation.
3266821	Pdf	11/22/2011 8:42 AM	11/22/2011 8:09 AM								show_temp[1].pdf	ccarnew	Attorney-Client	Attachment of court order in communication from Judge Henry to Galveston County attorney forwarding communication from redistricting counsel to Judge Henry, and copying Galveston County attorney and other redistricting counsel, providing legal analysis of court order in Petteway litigation.
2574846	Email	11/22/2011 8:43 AM	11/22/2011 8:43 AM	Judge Hoyt's orders		Henry, Mark <Mark.Henry@co.galveston.tx.us>;Clark, Ken <Ken.Clark@co.galveston.tx.us>;Doyle, Patrick <Patrick.Doyle@co.galveston.tx.us>;Holmes, Stephen <Stephen.Holmes@co.galveston.tx.us>;obradshaw@texasbar.com		Glywasky, Donald <Donald.Glywasky@co.galveston.tx.us>	Grady, Patricia <Patricia.Grady@co.galveston.tx.us>;Bazaman, Harvey <Harvey.Bazaman@co.galveston.tx.us>;Reingold, Myrna <Myrna.Reingold@co.galveston.tx.us>;Willey, Barry <Barry.Willey@co.galveston.tx.us>		Judge Hoyt's orders.msg		Attorney-Client	Communication from Galveston County employee to Judge Henry and Galveston County Commissioners, and copying Galveston County employees and attorney, forwarding the court order in the Petteway litigation
2576620	Pdf	11/22/2011 8:43 AM	11/22/2011 3:47 AM								Scan001.PDF		Attorney-Client	Attachment of court order in communication from Galveston County employee to Judge Henry and Galveston County Commissioners, and copying Galveston County employees and attorney, forwarding the court order in the Petteway litigation
3104518	Email	11/22/2011 10:15 AM	11/22/2011 10:15 AM	FW: Judge Hoyt's orders		Mabry, Celia-Frances <Celia-Frances.Mabry@co.galveston.tx.us>		Clark, Ken <Ken.Clark@co.galveston.tx.us>			FW Judge Hoyt's orders.msg		Attorney-Client	Communication from Commissioner Clark to Galveston County employee forwarding communication from Galveston County employee to Judge Henry and Galveston County Commissioners, and copying Galveston County employees and attorney, containing court order in the Petteway litigation
3106804	Pdf	11/22/2011 10:15 AM	11/22/2011 3:47 AM								Scan001.PDF		Attorney-Client	Attachment of court order in communication from Commissioner Clark to Galveston County employee forwarding communication from Galveston County employee to Judge Henry and Galveston County Commissioners, and copying Galveston County employees and attorney, containing court order in the Petteway litigation
2577101	Email	11/22/2011 11:33 AM	11/22/2011 11:33 AM	Judge Hoyt's orders		Sullivan, Dwight <Dwight.Sullivan@co.galveston.tx.us>;Johnson, Cheryl E <Cheryl.E.Johnson@co.galveston.tx.us>		Willey, Barry <Barry.Willey@co.galveston.tx.us>	Sargent, William <William.Sargent@co.galveston.tx.us>;Bazaman, Harvey <Harvey.Bazaman@co.galveston.tx.us>		Judge Hoyt's orders.msg		Attorney-Client	Communication from Galveston County attorney to Galveston County Clerk and Tax Assessor, and copying Galveston County employee and attorney, forwarding court order in the Petteway litigation
2577627	Pdf	11/22/2011 11:33 AM	11/22/2011 3:47 AM								Scan001.PDF		Attorney-Client	Attachment of court order in communication from Galveston County attorney to Galveston County Clerk and Tax Assessor, and copying Galveston County employee and attorney, forwarding court order in the Petteway litigation
3165934	Email	11/22/2011 2:51 PM	11/22/2011 2:51 PM	Fwd: Judge Hoyt's orders		Williams, Susan <Susan.Williams@co.galveston.tx.us>		Sullivan, Dwight <Dwight.Sullivan@co.galveston.tx.us>			Fwd Judge Hoyt's orders.msg		Attorney-Client	Communication from Galveston County Clerk to Galveston County employee forwarding communication from Galveston County attorney to Galveston County Clerk and Tax Assessor, and copying Galveston County employee and attorney, containing court order in the Petteway litigation

Document Id	Document Type	Family Date	Date (DISCO Date)	Subject	Plg Attachment Names	Def	Supplemental Privilege	From (4-14-2023)	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
3167666	Html	11/22/2011 2:51 PM	12/31/9999 6:00 PM								ATT6836368.htm		Attorney-Client	Attachment of .htm file in communication from Galveston County Clerk to Galveston County employee forwarding communication from Galveston County attorney to Galveston County Clerk and Tax Assessor, and copying Galveston County employee and attorney, containing court order in the Petteway litigation
3167629	Pdf	11/22/2011 2:51 PM	11/22/2011 3:47 AM								Scan001.PDF		Attorney-Client	Attachment of court order in communication from Galveston County Clerk to Galveston County employee forwarding communication from Galveston County attorney to Galveston County Clerk and Tax Assessor, and copying Galveston County employee and attorney, containing court order in the Petteway litigation
3300806	Email	12/21/2011 11:15 AM	12/21/2011 11:15 AM	Please see attachment		ttrainor@bmplp.com		Reingold, Myrna <Myrna.Reingold@co.galveston.tx.us>			Please see attachment.msg		Attorney-Client	Communication from Galveston County attorney to redistricting counsel forwarding DOJ preclearance request for additional information and asking for a callback re: same.
3302551	Pdf	12/21/2011 11:15 AM	12/21/2011 6:19 AM								Lette001.pdf		Attorney-Client	Attachment of DOJ letter in communication from Galveston County attorney to redistricting counsel forwarding DOJ preclearance request for additional information and asking for a callback re: same.
3290352	Email	12/21/2011 11:16 AM	12/21/2011 11:16 AM	FW: Please see attachment		ttrainor@bmplp.com; Nixon, Joe <jnixon@bmplp.com>		Reingold, Myrna <Myrna.Reingold@co.galveston.tx.us>			FW Please see attachment.msg		Attorney-Client	Communication from Galveston County attorney to redistricting counsel forwarding DOJ preclearance request for additional information and asking for a callback re: same.
3290880	Pdf	12/21/2011 11:16 AM	12/21/2011 6:19 AM								Lette001.pdf		Attorney-Client	Attachment of DOJ letter in communication from Galveston County attorney to redistricting counsel forwarding DOJ preclearance request for additional information and asking for a callback re: same.
3115542	Email	12/21/2011 12:19 PM	12/21/2011 12:19 PM	FW: Information for DOJ		Clark, Ken <Ken.Clark@co.galveston.tx.us>		Reingold, Myrna <Myrna.Reingold@co.galveston.tx.us>	Nixon, Joe <jnixon@bmplp.com>		FW Information for DOJ.msg		Attorney-Client	Communication from Galveston County attorney to Commissioner Clark, and copying redistricting counsel, forwarding DOJ preclearance request for additional information.
3117132	Pdf	12/21/2011 12:19 PM	12/21/2011 6:19 AM								Lette001.pdf		Attorney-Client	Attachment of DOJ letter in communication from Galveston County attorney to Commissioner Clark, and copying redistricting counsel, forwarding DOJ preclearance request for additional information.
3304871	Email	12/21/2011 12:20 PM	12/21/2011 12:20 PM	FW: Information for DOJ		O'Brien, Kevin <Kevin.O'Brien@co.galveston.tx.us>		Reingold, Myrna <Myrna.Reingold@co.galveston.tx.us>	Nixon, Joe <jnixon@bmplp.com>		FW Information for DOJ.msg		Attorney-Client	Communication from Galveston County attorney to Commissioner O'Brien, and copying redistricting counsel, forwarding DOJ preclearance request for additional information.
3305005	Pdf	12/21/2011 12:20 PM	12/21/2011 6:19 AM								Lette001.pdf		Attorney-Client	Attachment of DOJ letter in communication from Galveston County attorney to Commissioner O'Brien, and copying redistricting counsel, forwarding DOJ preclearance request for additional information.
3298210	Email	12/21/2011 12:29 PM	12/21/2011 12:29 PM	Dates and recordings		Grady, Patricia <Patricia.Grady@co.galveston.tx.us>		Reingold, Myrna <Myrna.Reingold@co.galveston.tx.us>	Nixon, Joe <jnixon@bmplp.com>		Dates and recordings.msg		Attorney-Client	Communication between Galveston County attorneys, and copying redistricting counsel, forwarding DOJ preclearance request for additional information and asking follow-up questions re: same.
3299031	Pdf	12/21/2011 12:29 PM	12/21/2011 6:19 AM								Lette001.pdf		Attorney-Client	Attachment of DOJ letter in communication between Galveston County attorney forwarding DOJ preclearance request for additional information and asking follow-up questions re: same.
3302104	Email	12/21/2011 3:43 PM	12/21/2011 3:43 PM	FW: Please see attachment		Grady, Patricia <Patricia.Grady@co.galveston.tx.us>		Reingold, Myrna <Myrna.Reingold@co.galveston.tx.us>			FW Please see attachment.msg		Attorney-Client	Communication between Galveston County attorneys forwarding DOJ preclearance request for additional information.

Document Id	Document Type	Family Date	Date (DISCO Date)	Subject	Plg Attachment Names	Def To Supplemental Privilege	From (4-14-2023)	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
3303033	Pdf	12/21/2011 3:43 PM	12/21/2011 6:19 AM							Lette001.pdf		Attorney-Client	Attachment of DOJ letter in communication between Galveston County attorneys forwarding DOJ preclearance request for additional information.
3298513	Email	12/21/2011 3:43 PM	12/21/2011 3:43 PM FW: Please see attachment			Grady, Patricia <Patricia.Grady@co.galveston.tx.us>	Reingold, Myrna <Myrna.Reingold@co.galveston.tx.us>			FW Please see attachment.msg		Attorney-Client	Communication between Galveston County attorneys forwarding DOJ preclearance request for additional information.
3301064	Pdf	12/21/2011 3:43 PM	12/21/2011 6:19 AM							Lette001.pdf		Attorney-Client	Communication between Galveston County attorneys forwarding DOJ preclearance request for additional information.
3295671	Email	12/21/2011 3:44 PM	12/21/2011 3:44 PM FW: Information for DOJ			Grady, Patricia <Patricia.Grady@co.galveston.tx.us>	Reingold, Myrna <Myrna.Reingold@co.galveston.tx.us>			FW Information for DOJ.msg		Attorney-Client	Communication between Galveston County attorneys forwarding DOJ preclearance request for additional information.
3296149	Pdf	12/21/2011 3:44 PM	12/21/2011 6:19 AM							Lette001.pdf		Attorney-Client	Attachment of DOJ letter in communication between Galveston County attorneys forwarding DOJ preclearance request for additional information.
3297551	Email	12/21/2011 3:44 PM	12/21/2011 3:44 PM FW: Information for DOJ			Grady, Patricia <Patricia.Grady@co.galveston.tx.us>	Reingold, Myrna <Myrna.Reingold@co.galveston.tx.us>			FW Information for DOJ.msg		Attorney-Client	Communication between Galveston County attorneys forwarding DOJ preclearance request for additional information.
3298261	Pdf	12/21/2011 3:44 PM	12/21/2011 6:19 AM							Lette001.pdf		Attorney-Client	Attachment of DOJ letter in communication between Galveston County attorneys forwarding DOJ preclearance request for additional information.
3305253	Email	12/21/2011 3:44 PM	12/21/2011 3:44 PM FW: Dates and recordings			Grady, Patricia <Patricia.Grady@co.galveston.tx.us>	Reingold, Myrna <Myrna.Reingold@co.galveston.tx.us>			FW Dates and recordings.msg		Attorney-Client	Communication between Galveston County attorneys forwarding DOJ preclearance request for additional information.
3306748	Pdf	12/21/2011 3:44 PM	12/21/2011 6:19 AM							Lette001.pdf		Attorney-Client	Attachment of DOJ letter in communication between Galveston County attorneys forwarding DOJ preclearance request for additional information.
3271941	Email	1/17/2012 10:45 AM	1/17/2012 10:45 AM show_temp[3]			Mark Henry <Mark@TalonAirServices.com>; Henry, Mark <Mark.Henry@co.galveston.tx.us>	Nixon, Joe <jnixon@bmpllp.com>			show_temp[3].msg		Attorney-Client	Communication from redistricting counsel to Judge Henry forwarding brief filed in Petteway litigation.
3272235	Pdf	1/17/2012 10:45 AM	1/16/2012 5:38 PM							show_temp[3].pdf	debbieg	Attorney-Client	Attachment of brief in communication from redistricting counsel to Judge Henry forwarding brief filed in Petteway litigation.
3268081	Email	1/27/2012 4:36 PM	1/27/2012 4:36 PM Briefs filed today on redistricting			Henry, Mark <Mark.Henry@co.galveston.tx.us>	Grady, Patricia <Patricia.Grady@co.galveston.tx.us>	Grady, Patricia <Patricia.Grady@co.galveston.tx.us>		Briefs filed today on redistricting.msg		Attorney-Client	Communication from Galveston County attorney to Judge Henry forwarding briefs filed in Petteway litigation.
3268351	Pdf	1/27/2012 4:36 PM	1/27/2012 4:25 PM							petteway brief defendant jan272012.pdf		Attorney-Client	Attachment of brief in communication from Galveston County attorney to Judge Henry forwarding briefs filed in Petteway litigation.
3268347	Pdf	1/27/2012 4:36 PM	1/27/2012 4:19 PM							petteway brief plaintiff jan272012.pdf		Attorney-Client	Attachment of brief in communication from Galveston County attorney to Judge Henry forwarding briefs filed in Petteway litigation.
3268339	Pdf	1/27/2012 4:36 PM	1/27/2012 4:02 PM							petteway brief intervenor jan272012.pdf		Attorney-Client	Attachment of brief in communication from Galveston County attorney to Judge Henry forwarding briefs filed in Petteway litigation.
3269506	Email	1/30/2012 8:51 AM	1/30/2012 8:51 AM show_temp[1]			Mark Henry <Mark@TalonAirServices.com>; Henry, Mark <Mark.Henry@co.galveston.tx.us>	Nixon, Joe <jnixon@bmpllp.com>			show_temp[1].msg		Attorney-Client	Communication from redistricting counsel to Judge Henry forwarding Plaintiffs' brief filed in Petteway litigation.
3270342	Pdf	1/30/2012 8:51 AM	1/27/2012 4:19 PM							show_temp[1].pdf		Attorney-Client	Attachment of brief in communication from redistricting counsel to Judge Henry forwarding Plaintiffs' brief filed in Petteway litigation.
3266992	Email	1/30/2012 8:53 AM	1/30/2012 8:53 AM show_temp[2]			Mark Henry <Mark@TalonAirServices.com>; Henry, Mark <Mark.Henry@co.galveston.tx.us>	Nixon, Joe <jnixon@bmpllp.com>			show_temp[2].msg		Attorney-Client	Communication from redistricting counsel to Judge Henry forwarding Defendants' brief filed in Petteway litigation.
3267450	Pdf	1/30/2012 8:53 AM	1/27/2012 9:46 AM							show_temp[2].pdf	debbieg	Attorney-Client	Attachment of brief in communication from redistricting counsel to Judge Henry forwarding Defendants' brief filed in Petteway litigation.

Document Id	Document Type	Family Date	Date (DISCO Date)	Subject	Plg Attachment Names	Def(s)	Supplemental Privilege Log (4-14-2023)	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
3264824	Email	1/30/2012 4:57 PM	1/30/2012 4:57 PM	show_temp[1]		Mark Henry <Mark@TalonAirServices.com>; Henry, Mark <Mark.Henry@co.galveston.tx.us>	Nixon, Joe <jnixon@bmplp.com>			show_temp[1].msg		Attorney-Client	Communication from redistricting counsel to Judge Henry forwarding supplemental brief filed in Petteway litigation.
3265109	Pdf	1/30/2012 4:57 PM	1/30/2012 4:49 PM							show_temp[1].pdf	Ispell	Attorney-Client	Attachment of brief in communication from redistricting counsel to Judge Henry forwarding supplemental brief filed in Petteway litigation.
3038819	Email	4/9/2012 5:00 PM	4/9/2012 5:00 PM	RE: Secretary of State Official Hispanic Report		Bazaman, Harvey <Harvey.Bazaman@co.galveston.tx.us>	Johnson, Cheryl E <Cheryl.E.Johnson@co.galveston.tx.us>	Allen, Dominique <Dominique.Allen@co.galveston.tx.us>; Yelton, Kathryn <Kathryn.Yelton@co.galveston.tx.us>; Swift, Sheryl <Sheryl.Swift@co.galveston.tx.us>		RE Secretary of State Official Hispanic Report.msg		Attorney-Client	Communication from Galveston County Tax Assessor to Galveston County attorney forwarding Secretary of State's Official Hispanic Report.
3040943	Pdf	4/9/2012 5:00 PM	12/31/9999 6:00 PM							Hispanic+Summary+Report+With+Precinct+-+StateWide_440111.pdf		Attorney-Client	Attachment of report in communication from Galveston County Tax Assessor to Galveston County attorney forwarding Secretary of State's Official Hispanic Report.
3041014	Text	4/9/2012 5:00 PM	12/31/9999 6:00 PM							Hispanic+Summary+Report+With+Precinct+-+StateWide_440110.csv		Attorney-Client	Attachment of .txt file in communication from Galveston County Tax Assessor to Galveston County attorney forwarding Secretary of State's Official Hispanic Report.
3264946	Email	3/26/2013 9:43 AM	3/26/2013 9:43 AM	Petteway - (f_s) Reply Brief for Defendants-Appellants		Henry, Mark <Mark.Henry@co.galveston.tx.us>	Nixon, Joe <jnixon@bmplp.com>			Petteway - (f_s) Reply Brief for Defendants-Appellants.msg		Attorney-Client;Work-Product	Communication redistricting counsel to Judge Henry concerning ongoing litigation at the 5th Circuit in Petteway litigation and sending court filings.
3265754	Pdf	3/26/2013 9:43 AM	3/25/2013 4:29 PM							Petteway - (f_s) Reply Brief for Defendants-Appellants.PDF		Attorney-Client;Work-Product	Attached 5th Circuit filing to communication from redistricting counsel to Judge Henry concerning ongoing litigation at the 5th Circuit in Petteway litigation and sending court filings.
3255093	Email	3/28/2013 1:16 PM	3/28/2013 1:16 PM	Petteway - (f_s) Reply Brief for Defendants-Appellants		Dennard, Ryan <Ryan.Dennard@co.galveston.tx.us>	Henry, Mark <Mark.Henry@co.galveston.tx.us>			Petteway - (f_s) Reply Brief for Defendants-Appellants.msg		Attorney-Client;Work-Product	Communication from Judge Henry to Commissioner Dennard forwarding communication from redistricting counsel to Judge Henry concerning ongoing litigation at the 5th Circuit in Petteway litigation and sending court filings.
3256063	Pdf	3/28/2013 1:16 PM	3/25/2013 4:29 PM							Petteway - (f_s) Reply Brief for Defendants-Appellants.PDF		Attorney-Client	Attached court filing to communication from Judge Henry to Commissioner Dennard forwarding communication from redistricting counsel to Judge Henry concerning ongoing litigation at the 5th Circuit in Petteway litigation and sending court filings.
2897228	Email	1/13/2014 8:50 PM	1/13/2014 8:50 PM	Brunell Report		Boemer, Bob <bob.boemer@co.galveston.tx.us>; Willey, Barry <Barry.Willey@co.galveston.tx.us>	Trainor, Trey <ttrainor@bmplp.com>	Nixon, Joe <jnixon@bmplp.com>		Brunell Report.msg		Attorney-Client;Work-Product	Communication from redistricting counsel to Galveston County attorneys, with a copy to redistricting counsel re: expert report filed in litigation.
2900033	Pdf	1/13/2014 8:50 PM	12/31/9999 6:00 PM							Expert report of Brunell-c.pdf		Attorney-Client;Work-Product	Attached expert report to communication from redistricting counsel to Galveston County attorneys, with a copy to redistricting counsel re: expert report filed in litigation.
2901811	Email	1/16/2014 8:17 AM	1/16/2014 8:17 AM	FW: Hofeller report		Barry Willey @ home <tesuj26@comcast.net>	Willey, Barry <Barry.Willey@co.galveston.tx.us>			FW Hofeller report.msg		Attorney-Client;Work-Product	Galveston County lawyer forwarding to his personal email account communication from redistricting counsel to Galveston County attorneys, with a copy to redistricting counsel re: expert report filed in litigation.
2902945	Pdf	1/16/2014 8:17 AM	12/31/9999 6:00 PM							Expert report of Hofeller-c.pdf		Attorney-Client;Work-Product	Attached expert report to communication from redistricting counsel to Galveston County attorneys, with a copy to redistricting counsel re: expert report filed in litigation.
3260416	Email	1/17/2014 4:35 PM	1/17/2014 4:35 PM	Judge Costa's briefing order		Henry, Mark <Mark.Henry@co.galveston.tx.us>; Dennard, Ryan <Ryan.Dennard@co.galveston.tx.us>	Boemer, Bob <Bob.Boemer@co.galveston.tx.us>	Nixon, Joe <jnixon@bmplp.com>; Trainor, Trey <ttrainor@bmplp.com>		Judge Costa's briefing order.msg		Attorney-Client;Work-Product	Communication from Galveston County lawyer to Judge Henry and Commissioner Dennard, copying redistricting counsel re: latest court order in Petteway litigation for additional briefing and providing Judge Henry and Commissioner Dennard counsels' initial impressions of the court's order.

Document Id	Document Type	Family Date	Date (DISCO Date)	Subject	Plig Attachment Names	Def	Supplemental Privilege	From (4-14-2023)	CC	BCC	Filename	Author	Privilege Tags	Privilege Note
3262541	Pdf	1/17/2014 4:35 PM	1/17/2014 3:48 PM								Doc 41 Order Jan 17, 2014.pdf	cifs	Attorney-Client;Work-Product	Court order attached to Communication from Galveston County lawyer to Judge Henry and Commissioner Dennard, copying redistricting counsel re: latest court order in Petteway litigation for additional briefing and providing Judge Henry and Commissioner Dennard counsels' initial impressions of the court's order.

EXHIBIT 2

Plaintiffs' Challenges to Supplemental Privilege Log

**Private Plaintiffs' Challenges to Defendants' Privilege Assertions
in the April 14, 2023 Supplemental Privilege Log**

Document Id	Filename	Defendants' Privilege Note	Plaintiffs' Privilege Objection Tags	Plaintiffs' Privilege Objection Notes
<i>Page 1 of Supplemental Privilege Log</i>				
2434381	FW Redistricting.msg	Communication from Galveston County GIS official to Galveston County GIS engineer relaying communication from Galveston County Attorney to County Judge Mark Henry, and Galveston County GIS employees relaying advice from Bickerstaff lawyers re: redistricting process and what is needed to conduct the redistricting process.	A/C – Boilerplate; A/C – Primary Purpose	Generic reference to “advice” is too conclusory to support privilege in the context of redistricting. Unclear from description whether advice was primarily legal or instead primarily strategic or logistical.
3146188	Redistricting Questions.msg	Communication from Galveston County attorney to Commissioner Clark and County Judge Henry answering legal questions and providing legal advice.	A/C – Boilerplate	Generic references to “legal questions” and “legal advice” are too conclusory to support privilege in the context of redistricting; boilerplate without further specification.
3148876	Scan001.PDF	Copy of Texas Constitution and Treatise attached to Communication from Galveston County attorney to Commissioner Clark and County Judge Henry answering legal questions and providing legal advice.	A/C – Boilerplate; A/C – Underlying Facts	Attached copy of Texas Constitution and Treatise is not privileged: such a document is not a confidential communication but instead an underlying fact. Generic references to “legal questions” and “legal advice” are too conclusory to support privilege in the context of redistricting; boilerplate without further specification.
<i>Page 2 of Supplemental Privilege Log</i>				
2867350	Galveston County .csv files.msg	Communication from Galveston County redistricting counsel to Galveston County GIS engineer transmitting draft map csv files.	A/C – Primary Purpose; A/C – Underlying Facts	Underlying drafts are not privileged but instead are underlying facts. Drafting maps is quintessentially legislative. Communication is likely primarily technical, policy, or political advice rather than legal advice; legal advice not even mentioned.

Document Id	Filename	Defendants' Privilege Note	Plaintiffs' Privilege Objection Tags	Plaintiffs' Privilege Objection Notes
2867860	Existing 2011 Galveston County Commissioner Court Districts.csv	Attached .csv file in communication from Galveston County redistricting counsel to Galveston County GIS engineer transmitting draft map csv files.	A/C – Primary Purpose; A/C – Underlying Facts	Underlying drafts are not privileged but instead are underlying facts. Drafting maps is quintessentially legislative. Communication is likely primarily technical, policy, or political advice rather than legal advice; legal advice not even mentioned. Plaintiffs are also concerned that Defendants may not have accurately described the contents of this .csv file, in light of similar incomplete descriptions of an Excel file from 2021. <i>See Ex. 4.</i>
2867876	Galveston County Commissioner Court Districts Proposal 2 07-07-11.csv	Attached .csv file in communication from Galveston County redistricting counsel to Galveston County GIS engineer transmitting draft map csv files.	A/C – Primary Purpose; A/C – Underlying Facts	Underlying drafts are not privileged but instead are underlying facts. Drafting maps is quintessentially legislative. Communication is likely primarily technical, policy, or political advice rather than legal advice; legal advice not even mentioned. Plaintiffs are also concerned that Defendants may not have accurately described the contents of this .csv file, in light of similar incomplete descriptions of an Excel file from 2021. <i>See Ex. 4.</i>
2867865	Galveston County JP Districts Proposal 1 07-07-11.csv	Attached .csv file in communication from Galveston County redistricting counsel to Galveston County GIS engineer transmitting draft map csv files.	A/C – Primary Purpose; A/C – Underlying Facts	Underlying drafts are not privileged but instead are underlying facts. Drafting maps is quintessentially legislative. Communication is likely primarily technical, policy, or political advice rather than legal advice; legal advice not even mentioned. Plaintiffs are also concerned that Defendants may not have accurately described the contents of this .csv file, in light of similar incomplete descriptions of an Excel file from 2021. <i>See Ex. 4.</i>

Document Id	Filename	Defendants' Privilege Note	Plaintiffs' Privilege Objection Tags	Plaintiffs' Privilege Objection Notes
2867870	Galveston County Commissioner Court Districts Proposal 1 07-07-11.csv	Attached .csv file in communication from Galveston County redistricting counsel to Galveston County GIS engineer transmitting draft map csv files.	A/C – Primary Purpose; A/C – Underlying Facts	Underlying drafts are not privileged but instead are underlying facts. Drafting maps is quintessentially legislative. Communication is likely primarily technical, policy, or political advice rather than legal advice; legal advice not even mentioned. Plaintiffs are also concerned that Defendants may not have accurately described the contents of this .csv file, in light of similar incomplete descriptions of an Excel file from 2021. <i>See Ex. 4.</i>
<i>Page 3 of Supplemental Privilege Log</i>				
2895905	FW Updated map based on news reportpublic comment.msg	Communication from Galveston County GIS Engineer to Galveston County GIS supervisor forwarding both attachments and communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.	A/C – Primary Purpose; A/C – Underlying Facts	Underlying drafts are not privileged but instead are underlying facts. Drafting maps is quintessentially legislative. Communication is likely primarily technical, policy, or political advice rather than legal advice, based on a produced, forwarded copy of the initial email in the email chain. <i>See Ex. 5</i> (attorney explaining that he had “drafted a new plan” and was sending the plan files along with “the population totals and voting age population on all three proposals,” but not analyzing the new plan in light of legal standards or discussing any potential legal consequences of the plan).
2896795	Commissioner Proposal 1A.prj;JP Proposal.prj	Attachment of .txt data in communication from Galveston County GIS Engineer to Galveston County GIS supervisor forwarding communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.	A/C – Primary Purpose; A/C – Underlying Facts	Underlying drafts are not privileged but instead are underlying facts. Drafting maps is quintessentially legislative. Communication is likely primarily technical, policy, or political advice rather than legal advice; legal advice not even mentioned.

Document Id	Filename	Defendants' Privilege Note	Plaintiffs' Privilege Objection Tags	Plaintiffs' Privilege Objection Notes
<i>Page 4 of Supplemental Privilege Log</i>				
2897806	JP Proposal.shp	Attachment of .cad file in communication from Galveston County GIS Engineer to Galveston County GIS supervisor forwarding communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.	A/C – Primary Purpose; A/C – Underlying Facts	Underlying drafts are not privileged but instead are underlying facts. Drafting maps is quintessentially legislative. Communication is likely primarily technical, policy, or political advice rather than legal advice; legal advice not even mentioned.
2897645	Commissioner Proposal 1A.shp	Attachment of .cad file in communication from Galveston County GIS Engineer to Galveston County GIS supervisor forwarding communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.	A/C – Primary Purpose; A/C – Underlying Facts	Underlying drafts are not privileged but instead are underlying facts. Drafting maps is quintessentially legislative. Communication is likely primarily technical, policy, or political advice rather than legal advice; legal advice not even mentioned.
2897509	JP Proposal.shx	Attachment of .cad file in communication from Galveston County GIS Engineer to Galveston County GIS supervisor forwarding communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.	A/C – Primary Purpose; A/C – Underlying Facts	Underlying drafts are not privileged but instead are underlying facts. Drafting maps is quintessentially legislative. Communication is likely primarily technical, policy, or political advice rather than legal advice; legal advice not even mentioned.
2897199	Population data for commissioner district proposals - Galveston County.pdf	PDF attachment in communication from Galveston County GIS Engineer to Galveston County GIS supervisor forwarding communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.	A/C – Primary Purpose; A/C – Underlying Facts	Underlying drafts and related data are not privileged but instead are underlying facts. Drafting maps is quintessentially legislative. Communication is likely primarily technical, policy, or political advice rather than legal advice; legal advice not even mentioned.

Document Id	Filename	Defendants' Privilege Note	Plaintiffs' Privilege Objection Tags	Plaintiffs' Privilege Objection Notes
2897357	JP Proposal 1A.jpg	Attachment of .jpg image in communication from Galveston County GIS Engineer to Galveston County GIS supervisor forwarding communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.	A/C – Primary Purpose; A/C – Underlying Facts	Underlying drafts are not privileged but instead are underlying facts. Drafting maps is quintessentially legislative. Communication is likely primarily technical, policy, or political advice rather than legal advice; legal advice not even mentioned.
2896926	Commissioner Proposal 1A.shx	Attachment of .cad file in communication from Galveston County GIS Engineer to Galveston County GIS supervisor forwarding communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.	A/C – Primary Purpose; A/C – Underlying Facts	Underlying drafts are not privileged but instead are underlying facts. Drafting maps is quintessentially legislative. Communication is likely primarily technical, policy, or political advice rather than legal advice; legal advice not even mentioned.
2897059	Proposal 1A.jpg	Attachment of .jpg image in communication from Galveston County GIS Engineer to Galveston County GIS supervisor forwarding communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.	A/C – Primary Purpose; A/C – Underlying Facts	Underlying drafts are not privileged but instead are underlying facts. Drafting maps is quintessentially legislative. Communication is likely primarily technical, policy, or political advice rather than legal advice; legal advice not even mentioned.

Document Id	Filename	Defendants' Privilege Note	Plaintiffs' Privilege Objection Tags	Plaintiffs' Privilege Objection Notes
2872068	RE Updated map based on news reportpublic comment.msg	Communication from Commissioner Doyle to Commissioner Holmes, commenting on communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.	A/C – Primary Purpose; A/C – Underlying Facts	Underlying drafts are not privileged but instead are underlying facts. Drafting maps is quintessentially legislative. Communication is likely primarily technical, policy, or political advice rather than legal advice, based on a produced, forwarded copy of the initial email in the email chain. <i>See</i> Ex. 5 (attorney explaining that he had “drafted a new plan” and was sending the plan files along with “the population totals and voting age population on all three proposals,” but not analyzing the new plan in light of legal standards or discussing any potential legal consequences of the plan).
<i>Page 5 of Supplemental Privilege Log</i>				
3248345	FW Updated map based on news reportpublic comment.msg	Communication from Commissioner Holmes to Commissioner Holmes's personal email account forwarding Communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.	A/C – Primary Purpose; A/C – Underlying Facts	Underlying drafts are not privileged but instead are underlying facts. Drafting maps is quintessentially legislative. Communication is likely primarily technical, policy, or political advice rather than legal advice, based on a produced, forwarded copy of the initial email in the email chain. <i>See</i> Ex. 5 (attorney explaining that he had “drafted a new plan” and was sending the plan files along with “the population totals and voting age population on all three proposals,” but not analyzing the new plan in light of legal standards or discussing any potential legal consequences of the plan).
3248780	Population data for commissioner district proposals - Galveston County.pdf	PDF attachment in communication from Commissioner Holmes to Commissioner Holmes's personal email account forwarding communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments	A/C – Primary Purpose; A/C – Underlying Facts	Underlying drafts and associated data are not privileged but instead are underlying facts. Drafting maps is quintessentially legislative. Communication is likely primarily technical, policy, or political advice rather than legal advice; legal advice not even mentioned.

Document Id	Filename	Defendants' Privilege Note	Plaintiffs' Privilege Objection Tags	Plaintiffs' Privilege Objection Notes
3248783	Proposal 1A.jpg	Attachment of .jpg image in communication from Commissioner Holmes to Commissioner Holmes's personal email account forwarding communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.	A/C – Primary Purpose; A/C – Underlying Facts	Underlying drafts are not privileged but instead are underlying facts. Drafting maps is quintessentially legislative. Communication is likely primarily technical, policy, or political advice rather than legal advice; legal advice not even mentioned.
3248773	Commissioner Proposal 1A.prj;JP Proposal.prj	Attachment of .txt data in communication from Commissioner Holmes to Commissioner Holmes's personal email account forwarding communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.	A/C – Primary Purpose; A/C – Underlying Facts	Underlying drafts are not privileged but instead are underlying facts. Drafting maps is quintessentially legislative. Communication is likely primarily technical, policy, or political advice rather than legal advice; legal advice not even mentioned.
3248789	JP Proposal.shp	Attachment of .cad file in communication from Commissioner Holmes to Commissioner Holmes's personal email account forwarding communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.	A/C – Primary Purpose; A/C – Underlying Facts	Underlying drafts are not privileged but instead are underlying facts. Drafting maps is quintessentially legislative. Communication is likely primarily technical, policy, or political advice rather than legal advice; legal advice not even mentioned.
3248787	Commissioner Proposal 1A.shp	Attachment of .cad file in communication from Commissioner Holmes to Commissioner Holmes's personal email account forwarding communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.	A/C – Primary Purpose; A/C – Underlying Facts	Underlying drafts are not privileged but instead are underlying facts. Drafting maps is quintessentially legislative. Communication is likely primarily technical, policy, or political advice rather than legal advice; legal advice not even mentioned.

Document Id	Filename	Defendants' Privilege Note	Plaintiffs' Privilege Objection Tags	Plaintiffs' Privilege Objection Notes
3248790	Commissioner Proposal 1A.shx	Attachment of .cad file in communication from Commissioner Holmes to Commissioner Holmes's personal email account forwarding communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.	A/C – Primary Purpose; A/C – Underlying Facts	Underlying drafts are not privileged but instead are underlying facts. Drafting maps is quintessentially legislative. Communication is likely primarily technical, policy, or political advice rather than legal advice; legal advice not even mentioned.
3248782	JP Proposal 1A.jpg	Attachment of .jpg image in communication from Commissioner Holmes to Commissioner Holmes's personal email account forwarding communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.	A/C – Primary Purpose; A/C – Underlying Facts	Underlying drafts are not privileged but instead are underlying facts. Drafting maps is quintessentially legislative. Communication is likely primarily technical, policy, or political advice rather than legal advice; legal advice not even mentioned.
<i>Page 6 of Supplemental Privilege Log</i>				
3248784	JP Proposal.shx	Attachment of .cad file in communication from Commissioner Holmes to Commissioner Holmes's personal email account forwarding communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.	A/C – Primary Purpose; A/C – Underlying Facts	Underlying drafts are not privileged but instead are underlying facts. Drafting maps is quintessentially legislative. Communication is likely primarily technical, policy, or political advice rather than legal advice; legal advice not even mentioned.

Document Id	Filename	Defendants' Privilege Note	Plaintiffs' Privilege Objection Tags	Plaintiffs' Privilege Objection Notes
3132914	FW Updated map based on news reportpublic comment.msg	Commissioner Clark forwarding to his personal email account both attachments and communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.	A/C – Primary Purpose; A/C – Underlying Facts	Underlying drafts are not privileged but instead are underlying facts. Drafting maps is quintessentially legislative. Communication is likely primarily technical, policy, or political advice rather than legal advice, based on a produced, forwarded copy of the initial email in the email chain. <i>See</i> Ex. 5 (attorney explaining that he had “drafted a new plan” and was sending the plan files along with “the population totals and voting age population on all three proposals,” but not analyzing the new plan in light of legal standards or discussing any potential legal consequences of the plan).
3134433	Commissioner Proposal 1A.shp	Attachment of .cad file in communication from Commissioner Clark forwarding to his personal email account both attachments and communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.	A/C – Primary Purpose; A/C – Underlying Facts	Underlying drafts are not privileged but instead are underlying facts. Drafting maps is quintessentially legislative. Communication is likely primarily technical, policy, or political advice rather than legal advice; legal advice not even mentioned.
3134235	JP Proposal.prj;Commissioner Proposal 1A.prj	Attachment of .txt data in communication from Commissioner Clark forwarding to his personal email account both attachments and communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.	A/C – Primary Purpose; A/C – Underlying Facts	Underlying drafts are not privileged but instead are underlying facts. Drafting maps is quintessentially legislative. Communication is likely primarily technical, policy, or political advice rather than legal advice; legal advice not even mentioned.

Document Id	Filename	Defendants' Privilege Note	Plaintiffs' Privilege Objection Tags	Plaintiffs' Privilege Objection Notes
3134316	JP Proposal 1A.jpg	Attachment of .jpg image in communication from Commissioner Clark forwarding to his personal email account both attachments and communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.	A/C – Primary Purpose; A/C – Underlying Facts	Underlying drafts are not privileged but instead are underlying facts. Drafting maps is quintessentially legislative. Communication is likely primarily technical, policy, or political advice rather than legal advice; legal advice not even mentioned.
3134293	Population data for commissioner district proposals - Galveston County.pdf	PDF attachment in communication from Commissioner Clark forwarding to his personal email account both attachments and communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.	A/C – Primary Purpose; A/C – Underlying Facts	Underlying drafts and associated data are not privileged but instead are underlying facts. Drafting maps is quintessentially legislative. Communication is likely primarily technical, policy, or political advice rather than legal advice; legal advice not even mentioned.
3134401	JP Proposal.shp	Attachment of .cad file in communication from Commissioner Clark forwarding to his personal email account both attachments and communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.	A/C – Primary Purpose; A/C – Underlying Facts	Underlying drafts are not privileged but instead are underlying facts. Drafting maps is quintessentially legislative. Communication is likely primarily technical, policy, or political advice rather than legal advice; legal advice not even mentioned.
3134342	JP Proposal.shx	Attachment of .cad file in communication from Commissioner Clark forwarding to his personal email account both attachments and communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.	A/C – Primary Purpose; A/C – Underlying Facts	Underlying drafts are not privileged but instead are underlying facts. Drafting maps is quintessentially legislative. Communication is likely primarily technical, policy, or political advice rather than legal advice; legal advice not even mentioned.

Document Id	Filename	Defendants' Privilege Note	Plaintiffs' Privilege Objection Tags	Plaintiffs' Privilege Objection Notes
<i>Page 7 of Supplemental Privilege Log</i>				
3134370	Commissioner Proposal 1A.shx	Attachment of .cad file in communication from Commissioner Clark forwarding to his personal email account both attachments and communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.	A/C – Primary Purpose; A/C – Underlying Facts	Underlying drafts are not privileged but instead are underlying facts. Drafting maps is quintessentially legislative. Communication is likely primarily technical, policy, or political advice rather than legal advice; legal advice not even mentioned.
3134261	Proposal 1A.jpg	Attachment of .jpg image in communication from Commissioner Clark forwarding to his personal email account both attachments and communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, and Galveston County GIS Engineer re: new map proposal in response to published comments.	A/C – Primary Purpose; A/C – Underlying Facts	Underlying drafts are not privileged but instead are underlying facts. Drafting maps is quintessentially legislative. Communication is likely primarily technical, policy, or political advice rather than legal advice; legal advice not even mentioned.
3130356	Pproposal 3 population data.msg	Communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, re: map proposal 3 and accompanying data.	A/C – Primary Purpose; A/C – Underlying Facts	Underlying drafts are not privileged but instead are underlying facts. Drafting maps is quintessentially legislative. Communication is likely primarily technical, policy, or political advice rather than legal advice; legal advice not even mentioned.
3131025	Population data for commissioner proposal 3 - Galveston County.pdf	Attachment, population and demographic data; communication from Galveston County redistricting counsel to County Judge Henry, Galveston County Commissioners, re: map proposal 3 and accompanying data.	A/C – Primary Purpose; A/C – Underlying Facts	Data related to draft maps are not privileged but instead are underlying facts. Drafting maps is quintessentially legislative. Communication is likely primarily technical, policy, or political advice rather than legal advice; legal advice not even mentioned.

Document Id	Filename	Defendants' Privilege Note	Plaintiffs' Privilege Objection Tags	Plaintiffs' Privilege Objection Notes
3096786	Redistricting Resolutions.msg	Communication from Galveston County attorney to Galveston County redistricting counsel, Galveston County chief deputy clerk, with a copy to the Galveston County commissioners re: legal requirements/templates for drafting redistricting resolutions/orders for the county to adopt.	A/C – Primary purpose	Reference to “legal requirements/templates” is boilerplate without further specification. No indication that email and attachments had primary purpose of legal advice, as opposed to strategic, political, or policy advice or otherwise “normal legislative business.” <i>See S.C. State Conf. of NAACP v. Alexander</i> , No. 21-CV-3302, 2022 WL 2375798, at *4–7 (D.S.C. Apr. 27, 2022).
3097887	JP and Constable Final Resolution November 5.doc	Attachment: 2001 JP and Constable final resolution adopting redistricting plan. communication from Galveston County attorney to Galveston County redistricting counsel, Galveston County chief deputy clerk, with a copy to the Galveston County commissioners re: legal requirements/templates for drafting redistricting resolutions/orders for the county to adopt.	A/C – Underlying Facts	Drafting maps is quintessentially legislative. Description indicates that the document is public or already known to the public, and an underlying fact.
3097878	Commissioners Resolution Final Oct. 8.doc	Attachment: 2001 Commissioner Court final resolution adopting redistricting plan. communication from Galveston County attorney to Galveston County redistricting counsel, Galveston County chief deputy clerk, with a copy to the Galveston County commissioners re: legal requirements/templates for drafting redistricting resolutions/orders for the county to adopt.	A/C – Underlying Facts	Drafting maps is quintessentially legislative. Description indicates that the document is public or already known to the public, and an underlying fact.

Document Id	Filename	Defendants' Privilege Note	Plaintiffs' Privilege Objection Tags	Plaintiffs' Privilege Objection Notes
<i>Page 8 of Supplemental Privilege Log</i>				
2865149	FW Redistricting Resolutions.msg	Communication from Galveston County chief deputy clerk to Galveston County GIS Engineer and GIS Supervisor relaying both attachments and communication from Galveston County attorney to Galveston County redistricting counsel, Galveston County chief deputy clerk, with a copy to the Galveston County commissioners re: legal requirements/templates for drafting redistricting resolutions/orders for the county to adopt.	A/C – Primary Purpose	Reference to “legal requirements/templates” is boilerplate without further specification. No indication that email and attachments had primary purpose of legal advice, as opposed to strategic, political, or policy advice or otherwise “normal legislative business.” <i>See S.C. State Conf. of NAACP v. Alexander</i> , No. 21-CV-3302, 2022 WL 2375798, at *4–7 (D.S.C. Apr. 27, 2022).
2866176	JP and Constable Final Resolution November 5.doc	Attachment of the 2001 Commissioner Court final resolution adopting redistricting plan in communication from Galveston County attorney to Galveston County redistricting counsel, Galveston County chief deputy clerk, with a copy to the Galveston County commissioners re: legal requirements/templates for drafting redistricting resolutions/orders for the county to adopt	A/C – Underlying Facts	Drafting maps is quintessentially legislative. Description indicates that the document is public or already known to the public, and an underlying fact.
2866175	Commissioners Resolution Final Oct. 8.doc	Attachment of the 2001 Commissioner Court final resolution adopting redistricting plan in communication from Galveston County attorney to Galveston County redistricting counsel, Galveston County chief deputy clerk, with a copy to the Galveston County commissioners re: legal requirements/templates for drafting redistricting resolutions/orders for the county to adopt.	A/C – Underlying Facts	Drafting maps is quintessentially legislative. Description indicates that the document is public or already known to the public, and an underlying fact.

Document Id	Filename	Defendants' Privilege Note	Plaintiffs' Privilege Objection Tags	Plaintiffs' Privilege Objection Notes
2873023	FW Redistricting Resolutions.msg	Communication from Galveston County GIS Engineer to Galveston County GIS Supervisor relaying attachments and communication from Galveston County attorney to Galveston County redistricting counsel, Galveston County chief deputy clerk, with a copy to the Galveston County commissioners re: legal requirements/templates for drafting redistricting resolutions/orders for the county to adopt.	A/C – Primary Purpose	Reference to “legal requirements/templates” is boilerplate without further specification. No indication that email and attachments had primary purpose of legal advice, as opposed to strategic, political, or policy advice or otherwise “normal legislative business.” <i>See S.C. State Conf. of NAACP v. Alexander</i> , No. 21-CV-3302, 2022 WL 2375798, at *4–7 (D.S.C. Apr. 27, 2022).
2873863	Commissioners Resolution Final Oct. 8.doc	Attachment of the 2001 Commissioner Court final resolution adopting redistricting plan in communication from Galveston County GIS Engineer to Galveston County GIS Supervisor relaying attachments and communication from Galveston County attorney to Galveston County redistricting counsel, Galveston County chief deputy clerk, with a copy to the Galveston County commissioners re: legal requirements/templates for drafting redistricting resolutions/orders for the county to adopt.	A/C – Underlying Facts	Drafting maps is quintessentially legislative. Description indicates that the document is public or already known to the public, and an underlying fact.

Document Id	Filename	Defendants' Privilege Note	Plaintiffs' Privilege Objection Tags	Plaintiffs' Privilege Objection Notes
2873848	JP and Constable Final Resolution November 5.doc	Attachment of the 2001 Commissioner Court final resolution adopting redistricting plan in communication from Galveston County GIS Engineer to Galveston County GIS Supervisor relaying attachments and communication from Galveston County attorney to Galveston County redistricting counsel, Galveston County chief deputy clerk, with a copy to the Galveston County commissioners re: legal requirements/templates for drafting redistricting resolutions/orders for the county to adopt.	A/C – Underlying Facts	Drafting maps is quintessentially legislative. Description indicates that the document is public or already known to the public, and an underlying fact.
<i>Page 9 of Supplemental Privilege Log</i>				
3094248	FW Redistricting Resolutions.msg	Communication from Galveston County Chief Deputy Clerk to Galveston County Redistricting Counsel's paralegal relaying both attachments and communication from Galveston County attorney to Galveston County redistricting counsel, Galveston County chief deputy clerk, with a copy to the Galveston County commissioners re: legal requirements/templates for drafting redistricting resolutions/orders for the county to adopt.	A/C – Primary Purpose	Reference to “legal requirements/templates” is boilerplate without further specification. No indication that email and attachments had primary purpose of legal advice, as opposed to strategic, political, or policy advice or otherwise “normal legislative business.” <i>See S.C. State Conf. of NAACP v. Alexander</i> , No. 21-CV-3302, 2022 WL 2375798, at *4–7 (D.S.C. Apr. 27, 2022).

Document Id	Filename	Defendants' Privilege Note	Plaintiffs' Privilege Objection Tags	Plaintiffs' Privilege Objection Notes
3095433	JP and Constable Final Resolution November 5.doc	Attachment of the 2001 Commissioner Court final resolution adopting redistricting plan in communication from Galveston County Chief Deputy Clerk to Galveston County Redistricting Counsel's paralegal relaying both attachments and communication from Galveston County attorney to Galveston County redistricting counsel, Galveston County chief deputy clerk, with a copy to the Galveston County commissioners re: legal requirements/templates for drafting redistricting resolutions/orders for the county to adopt.	A/C – Underlying Facts	Drafting maps is quintessentially legislative. Description indicates that the document is public or already known to the public, and an underlying fact.
3095435	Commissioners Resolution Final Oct. 8.doc	Attachment of the 2001 Commissioner Court final resolution adopting redistricting plan in communication from Galveston County Chief Deputy Clerk to Galveston County Redistricting Counsel's paralegal relaying both attachments and communication from Galveston County attorney to Galveston County redistricting counsel, Galveston County chief deputy clerk, with a copy to the Galveston County commissioners re: legal requirements/templates for drafting redistricting resolutions/orders for the county to adopt.	A/C – Underlying Facts	Drafting maps is quintessentially legislative. Description indicates that the document is public or already known to the public, and an underlying fact.
3098298	FW Redistricting Resolutions.msg	Galveston County Clerk to Galveston County attorney relaying attachments and communication from Galveston County attorney to Galveston County redistricting counsel, Galveston County chief deputy clerk, with a copy to the Galveston County commissioners re: legal requirements/templates for drafting redistricting resolutions/orders for the county to adopt.	A/C – Primary Purpose	Reference to “legal requirements/templates” is boilerplate without further specification. No indication that email and attachments had primary purpose of legal advice, as opposed to strategic, political, or policy advice or otherwise “normal legislative business.” <i>See S.C. State Conf. of NAACP v. Alexander</i> , No. 21-CV-3302, 2022 WL 2375798, at *4–7 (D.S.C. Apr. 27, 2022).

Document Id	Filename	Defendants' Privilege Note	Plaintiffs' Privilege Objection Tags	Plaintiffs' Privilege Objection Notes
3099225	JP and Constable Final Resolution November 5.doc	Attachment of 2001 order adopting Justice of the Peace precincts in communication from Deputy Galveston County Clerk to Galveston County attorney relaying attachments and communication from Galveston County attorney to Galveston County redistricting counsel, Galveston County chief deputy clerk, with a copy to the Galveston County commissioners re: legal requirements/templates for drafting redistricting resolutions/orders for the county to adopt.	A/C – Underlying Facts	Drafting maps is quintessentially legislative. Description indicates that the document is public or already known to the public, and an underlying fact.
3099303	Commissioners Resolution Final Oct. 8.doc	Attachment of 2001 order adopting Commissioners Court precincts in communication from Deputy Galveston County Clerk to Galveston County attorney relaying attachments and communication from Galveston County attorney to Galveston County redistricting counsel, Galveston County chief deputy clerk, with a copy to the Galveston County commissioners re: legal requirements/templates for drafting redistricting resolutions/orders for the county to adopt.	A/C – Underlying Facts	Drafting maps is quintessentially legislative. Description indicates that the document is public or already known to the public, and an underlying fact.

Document Id	Filename	Defendants' Privilege Note	Plaintiffs' Privilege Objection Tags	Plaintiffs' Privilege Objection Notes
<i>Page 10 of Supplemental Privilege Log</i>				
3271781	FW Documents as per your request this morning.msg	County legal liaison to Judge Henry and Judge Henry's executive assistant forwarding draft documents from redistricting counsel and inquiring whether the documents are signable.	A/C – Boilerplate; A/C – Underlying Facts; A/C – Primary Purpose	Reference to drafts coming “from redistricting counsel” is too conclusory to support privilege in the context of redistricting; boilerplate without further specification. Drafting of orders—and the County Judge reviewing and approving those orders—is “normal legislative business”; no indication that email and attachments had primary purpose of legal advice, as opposed to strategic, political, or policy advice or otherwise “normal legislative business.” <i>See S.C. State Conf. of NAACP v. Alexander</i> , No. 21-CV-3302, 2022 WL 2375798, at *4–7 (D.S.C. Apr. 27, 2022).Map-drawing and related orders are underlying facts part of the legislative record.
3272762	Galveston County Redistricting Order.pdf	Attached draft order to communication from Galveston County legal liaison to Judge Henry and Judge Henry's executive assistant forwarding draft documents from redistricting counsel and inquiring whether the documents are signable.	A/C – Boilerplate; A/C – Underlying Facts; A/C – Primary Purpose	Reference to drafts coming “from redistricting counsel” is too conclusory to support privilege in the context of redistricting; boilerplate without further specification. Drafting of orders—and the County Judge reviewing and approving those orders—is part of ordinary legislative process. Map-drawing and related orders are underlying facts part of the legislative record. No indication that email and attachments had primary purpose of legal advice, as opposed to strategic, political, or policy advice or otherwise “normal legislative business.” <i>See S.C. State Conf. of NAACP v. Alexander</i> , No. 21-CV-3302, 2022 WL 2375798, at *4–7 (D.S.C. Apr. 27, 2022).

Document Id	Filename	Defendants' Privilege Note	Plaintiffs' Privilege Objection Tags	Plaintiffs' Privilege Objection Notes
3272760	Galveston County JP Redistricting.pdf	Attached draft Commissioners Court Order to communication from Galveston County legal liaison to Judge Henry and Judge Henry's executive assistant forwarding draft documents from redistricting counsel and inquiring whether the documents are signable.	A/C – Boilerplate; A/C – Underlying Facts; A/C – Primary Purpose	Reference to drafts coming “from redistricting counsel” is too conclusory to support privilege in the context of redistricting; boilerplate without further specification. Drafting of orders—and the County Judge reviewing and approving those orders—is part of ordinary legislative process. Map-drawing and related orders are underlying facts part of the legislative record. No indication that email and attachments had primary purpose of legal advice, as opposed to strategic, political, or policy advice or otherwise “normal legislative business.” <i>See S.C. State Conf. of NAACP v. Alexander</i> , No. 21-CV-3302, 2022 WL 2375798, at *4–7 (D.S.C. Apr. 27, 2022).
<i>Page 12 of Supplemental Privilege Log</i>				
3300806	Please see attachment.msg	Communication from Galveston County attorney to redistricting counsel forwarding DOJ preclearance request for additional information and asking for a callback re: same.	A/C – Underlying Facts	Documents created for preclearance submission are not privileged, and are created pursuant to normal legislative process. Information sought about redistricting process is underlying facts.
3302551	Lette001.pdf	Attachment of DOJ letter in communication from Galveston County attorney to redistricting counsel forwarding DOJ preclearance request for additional information and asking for a callback re: same.	A/C – Underlying Facts	Attached DOJ preclearance letter is not privileged, was sent by third party (DOJ) and is underlying fact. Information disclosed relating to redistricting process are underlying facts.
3290352	FW Please see attachment.msg	Communication from Galveston County attorney to redistricting counsel forwarding DOJ preclearance request for additional information and asking for a callback re: same.	A/C – Underlying Facts	Documents created for preclearance submission are not privileged, and are created pursuant to normal legislative process. Information sought about redistricting process is underlying facts.

Document Id	Filename	Defendants' Privilege Note	Plaintiffs' Privilege Objection Tags	Plaintiffs' Privilege Objection Notes
3290880	Lette001.pdf	Attachment of DOJ letter in communication from Galveston County attorney to redistricting counsel forwarding DOJ preclearance request for additional information and asking for a callback re: same.	A/C – Underlying Facts	Attached DOJ preclearance letter is not privileged, was sent by third party (DOJ) and is underlying fact. Information disclosed relating to redistricting process are underlying facts.
3115542	FW Information for DOJ.msg	Communication from Galveston County attorney to Commissioner Clark, and copying redistricting counsel, forwarding DOJ preclearance request for additional information.	A/C – Underlying Facts	Documents created for preclearance submission are not privileged, and are created pursuant to normal legislative process. Information sought about redistricting process is underlying facts.
3117132	Lette001.pdf	Attachment of DOJ letter in communication from Galveston County attorney to Commissioner Clark, and copying redistricting counsel, forwarding DOJ preclearance request for additional information.	A/C – Underlying Facts	Attached DOJ preclearance letter is not privileged, was sent by third party (DOJ) and is underlying fact. Information disclosed relating to redistricting process are underlying facts.
3304871	FW Information for DOJ.msg	Communication from Galveston County attorney to Commissioner O'Brien, and copying redistricting counsel, forwarding DOJ preclearance request for additional information.	A/C – Underlying Facts	Documents created for preclearance submission are not privileged, and are created pursuant to normal legislative process. Information sought about redistricting process is underlying facts.
3305005	Lette001.pdf	Attachment of DOJ letter in communication from Galveston County attorney to Commissioner O'Brien, and copying redistricting counsel, forwarding DOJ preclearance request for additional information.	A/C – Underlying Facts	Attached DOJ preclearance letter is not privileged, was sent by third party (DOJ) and is underlying fact. Information disclosed relating to redistricting process are underlying facts.
3298210	Dates and recordings.msg	Communication between Galveston County attorneys, and copying redistricting counsel, forwarding DOJ preclearance request for additional information and asking follow-up questions re: same.	A/C – Underlying Facts	Documents created for preclearance submission are not privileged, and are created pursuant to normal legislative process. Information sought about redistricting process is underlying facts.

Document Id	Filename	Defendants' Privilege Note	Plaintiffs' Privilege Objection Tags	Plaintiffs' Privilege Objection Notes
3299031	Lette001.pdf	Attachment of DOJ letter in communication between Galveston County attorney forwarding DOJ preclearance request for additional information and asking follow-up questions re: same.	A/C – Underlying Facts	Attached DOJ preclearance letter is not privileged, was sent by third party (DOJ) and is underlying fact. Information disclosed relating to redistricting process are underlying facts.
3302104	FW Please see attachment.msg	Communication between Galveston County attorneys forwarding DOJ preclearance request for additional information.	A/C – Underlying Facts	Documents created for preclearance submission are not privileged, and are created pursuant to normal legislative process. Information sought about redistricting process is underlying facts.
<i>Page 13 of Supplemental Privilege Log</i>				
3303033	Lette001.pdf	Attachment of DOJ letter in communication between Galveston County attorneys forwarding DOJ preclearance request for additional information.	A/C – Underlying Facts	Attached DOJ preclearance letter is not privileged, was sent by third party (DOJ) and is underlying fact. Information disclosed relating to redistricting process are underlying facts.
3298513	FW Please see attachment.msg	Communication between Galveston County attorneys forwarding DOJ preclearance request for additional information.	A/C – Underlying Facts	Documents created for preclearance submission are not privileged, and are created pursuant to normal legislative process. Information sought about redistricting process is underlying facts.
3301064	Lette001.pdf	Communication between Galveston County attorneys forwarding DOJ preclearance request for additional information.	A/C – Underlying Facts	Attached DOJ preclearance letter is not privileged, was sent by third party (DOJ) and is underlying fact. Information disclosed relating to redistricting process are underlying facts.
3295671	FW Information for DOJ.msg	Communication between Galveston County attorneys forwarding DOJ preclearance request for additional information.	A/C – Underlying Facts	Documents created for preclearance submission are not privileged, and are created pursuant to normal legislative process. Information sought about redistricting process is underlying facts.
3296149	Lette001.pdf	Attachment of DOJ letter in communication between Galveston County attorneys forwarding DOJ preclearance request for additional information.	A/C – Underlying Facts	Attached DOJ preclearance letter is not privileged, was sent by third party (DOJ) and is underlying fact. Information disclosed relating to redistricting process are underlying facts.

Document Id	Filename	Defendants' Privilege Note	Plaintiffs' Privilege Objection Tags	Plaintiffs' Privilege Objection Notes
3297551	FW Information for DOJ.msg	Communication between Galveston County attorneys forwarding DOJ preclearance request for additional information.	A/C – Underlying Facts	Documents created for preclearance submission are not privileged, and are created pursuant to normal legislative process. Information sought about redistricting process is underlying facts.
3298261	Lette001.pdf	Attachment of DOJ letter in communication between Galveston County attorneys forwarding DOJ preclearance request for additional information.	A/C – Underlying Facts	Attached DOJ preclearance letter is not privileged, was sent by third party (DOJ) and is underlying fact. Information disclosed relating to redistricting process are underlying facts.
3305253	FW Dates and recordings.msg	Communication between Galveston County attorneys forwarding DOJ preclearance request for additional information.	A/C – Underlying Facts	Documents created for preclearance submission are not privileged, and are created pursuant to normal legislative process. Information sought about redistricting process is underlying facts.
3306748	Lette001.pdf	Attachment of DOJ letter in communication between Galveston County attorneys forwarding DOJ preclearance request for additional information.	A/C – Underlying Facts	Attached DOJ preclearance letter is not privileged, was sent by third party (DOJ) and is underlying fact. Information disclosed relating to redistricting process are underlying facts.
<i>Page 14 of Supplemental Privilege Log</i>				
3038819	RE Secretary of State Official Hispanic Report.msg	Communication from Galveston County Tax Assessor to Galveston County attorney forwarding Secretary of State's Official Hispanic Report.	A/C – Primary Purpose; A/C - Underlying Facts	In light of description and attached files, it does not appear that this email was intended to seek or convey primarily legal advice, as opposed to technical, statistical information. Secretary of State's Official Hispanic Report is underlying fact and not privileged.
3040943	Hispanic+Summary+Report+With+Precinct+-+StateWide_440111.pdf	Attachment of report in communication from Galveston County Tax Assessor to Galveston County attorney forwarding Secretary of State's Official Hispanic Report.	A/C – Underlying Facts	Attached report is underlying fact that are not privileged. It was not even created by Defendants or their counsel, but instead by the Texas Secretary of State, and thus should be produced.

Document Id	Filename	Defendants' Privilege Note	Plaintiffs' Privilege Objection Tags	Plaintiffs' Privilege Objection Notes
3041014	Hispanic+Summary+Report+With+Precinct+-+StateWide_440110.csv	Attachment of .txt file in communication from Galveston County Tax Assessor to Galveston County attorney forwarding Secretary of State's Official Hispanic Report.	A/C – Underlying Facts	Attachment is a .csv file, not a .txt file as indicated in description. Based on title, is part of the Texas Secretary of State's Official Hispanic Report and is therefore an underlying fact that are not privileged.

EXHIBIT 3

Letter re in camera Review of Additional Document

Holtzman Vogel

HOLTZMAN VOGEL BARAN TORCHINSKY & JOSEFIK PLLC

April 14, 2023

VIA E-MAIL

Magistrate Judge Andrew M. Edison
U.S. District Court for the Southern District of Texas
c/o: Ruben Castro (Ruben_Castro@txs.uscourts.gov)

Re: *In Camera* Review of an Additional Privileged Document
Petteway et. al, v. Galveston County, et al., Civil Action No. 3:22-cv-00057

Your Honor,

On March 22, 2023, Defendants made a supplemental document production in response to Plaintiffs' First Requests for Production. However, Defendants inadvertently released one document in that production that contains attorney-client privileged information. The document consists of the following:

DEFS00031696: Spreadsheet prepared on October 15, 2021 by Thomas Bryan (map-drawer/technical consultant retained by Galveston County's redistricting counsel). The spreadsheet is a breakdown of the population in Galveston County, based on the 2020 U.S. Census data and the 2016-2020 American Community Survey (ACS) estimates. Mr. Bryan prepared this spreadsheet at the request of Phillip Gordon and Jason Torchinsky (redistricting counsel) in order for them to understand the lay of the land and conduct an initial analysis of the legal considerations at play in the 2021 redistricting process for the Galveston County Commissioners Court.

Defendants sent Plaintiffs a letter on April 12, 2023 to: (1) notify them that Defendants are asserting privilege over the document, and (2) to request that Plaintiffs "sequester, return or destroy all inadvertently produced material" in accordance with the Joint Discovery Protocol. ECF 70-1, § II(D)(2)(d). The next day, on April 13, 20223, counsel for the parties conferred on whether the attorney-client privilege applies to the document but were unable to reach a resolution. At that time, counsel for Defendants notified Plaintiffs that they would be sending the document to the Court for *in camera* review (along with the other documents that Defendants already transmitted to the Court after the April 12, 2023 discovery hearing). Defendants hereby ask the Court to determine whether the attorney client privilege applies to the attached document.

Defendants' position is that the attorney-client privilege applies to this document because it was prepared at the request of redistricting counsel, specifically so they could conduct an initial analysis of the relevant data and provide guidance to Mr. Bryan as he began drafting map options early in the redistricting process (before the Commissioners Court was presented with any proposals). This is consistent with the arguments Defendants raised in opposition to Plaintiffs' Motions to Compel that are currently pending before the Court. *See* ECF 102, 103.

HOLTZMAN VOGEL BARAN TORCHINSKY & JOSEFIAK PLLC

As Defendants stated in their opposition briefs to that Motion, this document—and the analysis and discussions that it facilitated between Mr. Bryan and redistricting counsel—were “fashioned exclusively within the attorney-client relationship.” *See* Defs.’ Opp. to Petteway Pls.’ Mot. to Compel at 14-16 (ECF 108); Defs.’ Opp. to United States’ Mot. to Compel at 14, 20 (ECF 107). They are thus entitled to the attorney-client privilege.

We thank the Court for its time and consideration, and look forward to the Court’s resolution of this matter.

Respectfully,



Shawn T. Sheehy
Counsel for Defendants

EXHIBIT 4

*Private Plaintiffs' Correspondence to Court
re: Clawback Claim*

April 14, 2023

VIA E-MAIL

Magistrate Judge Andrew M. Edison
U.S. District Court for the Southern District of Texas
c/o: Ruben Castro (Ruben_Castro@txs.uscourts.gov)

*Re: Defendants' April 14, 2023 Correspondence re Clawback Document
Petteway, et al. v. Galveston County, et al., Civil Action No. 3:22-cv-00057*

Your Honor,

Earlier today you received correspondence from Attorney Sheehy providing argument for why a document Defendants produced to Plaintiffs, a spreadsheet Bates labeled DEFS00031696, is purportedly protected from disclosure by attorney-client and attorney work product privilege. We understand that Defendants sent the document to the Court by separate email. Because Defendants' letter seriously misstates both the facts regarding the document and the law, we submit this response.¹

The spreadsheet was among a handful of documents produced on March 22, 2023. Although Defendants claim that they realized that it was "inadvertently released" to Plaintiffs on April 4, they waited over a week—until April 12—to notify Plaintiffs of the issue. By that time, substantial analysis of the document in preparation for Mr. Bryan's deposition (set for Monday, April 17) had already occurred. While Plaintiffs have sequestered the spreadsheet pursuant to the joint discovery protocol, ECF 70-1, it is imperative that this Court understand the context and importance of this document when reviewing it *in camera* and in ruling on the pending Motions to Compel.

Defendants characterize the spreadsheet as "a breakdown of the population in Galveston County, based on the 2020 U.S. Census data and the 2016-2020 American Community Survey (ACS) estimates" that Defendants' counsel say they asked Mr. Bryan to create "so they could conduct an initial analysis of the relevant data and provide guidance to Mr. Bryan as he began drafting map options early in the redistricting process (before the Commissioners Court was presented with any proposals)." Apr. 14, 2023 Sheehy Letter.

This is a grossly incomplete description of the spreadsheet that borders on misrepresentation by omission. The spreadsheet includes two "Block Assignment" Files—the technical term for the data format of a draft redistricting map. In other words, the spreadsheet contains the data files for *two* redistricting draft maps that Mr. Bryan drew late in the evening on October 15, 2021 and early morning of October 16, along with a host of detailed racial data and racial analysis regarding the draft maps. He included the Black Voting Age Population and

¹ Plaintiffs had understood from the parties' phone conference that the parties would be submitting a Joint Dispute Letter regarding this clawback matter, but instead Defendants have unilaterally sent a letter to the Court with their position and legal argument. Because of the urgency of the issue and to avoid prejudice, Plaintiffs are compelled to respond.

Hispanic Voting Age Population percentages for *each* Census Block, which is the most detailed level U.S. Census racial data can be analyzed, along with its corresponding precinct assignment from his map drawing. This data was listed in a *sortable* column, allowing for the Census Blocks and their corresponding precinct assignments from Mr. Bryan’s draft map to be sorted from high Black or Latino composition to low, or for specific percentage ranges of minority population to be selected and reviewed. Among other data, Mr. Bryan dedicated a unique tab that displayed detailed racial composition analysis for each draft Commissioner precinct in the two draft maps (Tab 2).

Upon receipt of this document in discovery (and well before receipt of Defendants’ clawback letter), Plaintiffs imported the Block Assignment File data into GIS mapping software to generate the corresponding map images in preparation for Mr. Bryan’s deposition. Although the clawback provision of the joint discovery protocol is silent as to material that is independently generated from clawback documents, Plaintiffs are nevertheless sequestering the maps that were generated from the spreadsheet in an abundance of caution. Plaintiffs can make these maps available to the Court at the Court’s request and believe that is important that the Court see the maps in order to understand the meaning of this spreadsheet as well as all similar spreadsheets that have been provided for *in camera* review. These are not mere lists of numbers and code.

Both the map images and the spreadsheet are critical evidence of the mapdrawers’ and the Commissioners’ intent and bear directly on Plaintiffs’ legal claims of intentional racial discrimination and racial gerrymandering. This spreadsheet and the corresponding draft maps show that the racial composition of the proposed Commissioner precincts—drilled down to the Census block level—was the predominant consideration in the mapdrawing and was used to dilute minority voting strength. The maps also illustrate the pretextual nature of Defendants’ litigation claim that creation of a “coastal precinct” and other redistricting considerations drove the decision to eliminate the minority opportunity precinct represented by Commissioner Holmes. The spreadsheet and corresponding draft maps directly contradict the *post hoc* narrative Defendants have developed and intend to portray at trial.

Defendants have listed 13 excel files in their privilege log (Doc. 102-5), including 9 excel files from the 2021 redistricting process alone. The spreadsheet that Defendants seek to clawback here—and those like it—are not conceivably privileged. By their own explanation, Mr. Bryan drew these maps prior to receiving any supposed legal guidance about how to proceed with his mapmaking. This is likewise clear from Mr. Bryan’s emails discussing these maps and data. After this week’s discovery conference, the parties provided the Court with four emails with disputed privilege redactions. The spreadsheet that is subject to this clawback dispute corresponds to Bates stamped document DEFS00027884. *Mr. Bryan* starts that email chain at 1:55 AM on October 16, 2021 saying “Jason and Phil, I just got a draft plan ready with [REDACTED]. Please lmk when you’d like to discuss.” Receiving no response, he responds again at 5:25 PM on October 16, 2021 asking for a call to discuss his draft maps with a “Teaser” paragraph (presumably characterizing what he had drawn) that Defendants have redacted. The rest of the email makes clear that at this point, Mr. Bryan was not even aware of Mr. Oldham, his role, or that he was a lawyer. Mr. Bryan’s description of the map he drew is not possibly privileged.

During the March 6, 2023 hearing (approximately 9:40 AM CT) before Magistrate Judge Edison, we understand that counsel for Defendants represented that Defendants did not believe

that the county is entitled to privilege over documents, such as these, generated by Mr. Bryan. Defendants’ counsel specifically conceded that data and map attachments to emails would not be privileged, even if Defendants claimed the email contained privileged information.

As set forth in more detail in Plaintiffs’ Motion to Compel (Doc. 102), nothing about this spreadsheet—or the many others that have been withheld—is privileged. It is the data format of a draft redistricting map with associated racial data. It is not a communication between an attorney and a client nor does it contain any legal advice. It is data about draft map lines. The fact that Mr. Oldham or Holtzman Vogel lawyers may have provided their clients with legal advice after reviewing these draft maps and data does not make the underlying maps or data themselves privileged. Nor were the maps or data created for the primary purpose of litigation; they were created in order to conduct the legislative function of redistricting. *See, e.g., LULAC v. Abbott*, No. 21-cv-00259-DCG-JES-JVB, 2022 WL 3353409, at *5 (W.D. Tex. Aug. 12, 2022) (holding that maps and analysis created to assist legislature in drafting legislation is not protected work product). *See generally*, Doc. 102 (Mot. to Compel); Doc. 109 (Reply in support of same). This spreadsheet and the others like it that are before the Court for *in camera* review are not merely Census data that Defendants’ lawyers requested so they can render legal advice. They are key evidence of the discriminatory scheme that resulted in the Enacted Plan. Plaintiffs are not aware (and Defendants have not cited) any court decision holding that draft voting maps created under these circumstances are attorney-client or work-product privileged.

Plaintiffs are likewise concerned, given the wholly inaccurate description of this spreadsheet Defendants provided this Court, that similarly misleading information has been provided about the other documents and data submitted *in camera* by Defendants. It is easy to obscure critical evidence of discriminatory intent and racial gerrymandering when it comes in the form of dense spreadsheet data and code. Defendants should not be permitted to leverage this and “cloak the record of that action behind a charade masking as privilege.” *Baldus v. Members of Wis. Gov’t Accountability Bd.*, 843 F. Supp. 2d 955, 958 (E.D. Wis. 2012). As other courts have observed, such actions directly contravene the requirements, and core purpose, of discovery obligations set forth in the Federal Rules of Civil Procedure. *See, e.g., Bainter v. League of Women Voters of Fla.*, 150 So. 3d 1115, 1118 (Fla. 2014) (ordering production of draft maps and related information generated during a “parallel redistricting process . . . conducted in the shadows in an effort to subvert[] the public process” because “full and fair discovery is essential to the truth-finding function of our justice system”) (internal quotations omitted).

Plaintiffs are available to discuss at a conference with the Court to aid in the Court’s understanding of the issues before it.

Sincerely,

Mark P. Gaber*
D.C. Bar No. 988077

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919-323-3942 (Facsimile)
hilaryhklein@scsj.org
Counsel for NAACP Plaintiffs

EXHIBIT 5

DEFS00031597

From: Holmes, Stephen
Sent: Monday, August 29, 2011 2:53 PM CDT
To: tj.aulds@galvnews.com
Subject: FW: Updated map based on news report/public comment
Attachments: Commissioner Proposal 1A.prj, Commissioner Proposal 1A.shp, Commissioner Proposal 1A.shx, JP Proposal.prj, JP Proposal.shx, JP Proposal.shp, Proposal 1A.jpg, JP Proposal 1A.jpg, Population data for commissioner district proposals - Galveston County.pdf

From: Trainor, Trey [mailto:ttrainor@bmpllp.com]
Sent: Monday, August 29, 2011 1:02 PM
To: Henry, Mark
Cc: Doyle, Patrick; O'Brien, Kevin; Holmes, Stephen; Clark, Ken; Sigler, Nathan
Subject: Updated map based on news report/public comment

Judge Henry,

In a story in today's paper (<http://galvestondailynews.com/story/254338>) there was comment about keeping Bolivar with the island in a commissioner precinct. I have drafted a new plan that accomplishes that (I'm calling it proposal 1A). This map is a combination of proposals 1 and 2. I've attached the block assignment/shape files and jpg files so that the county staff can print hard copies. I've also attached a document that shows the population totals and voting age population data on all three proposals (1, 1A, and 2).

I'm also sending along a 2nd JP/Constable proposal I've developed (calling it 1A as well since it is close to the original proposal).

If you or any of the Commissioners have any questions, please feel free to contact me.

Respectfully,

Trey Trainor
Beirne, Maynard & Parsons, L.L.P.
401 West 15th Street, Suite 845
Austin, TX 78701
Office: (512) 623-6700
Fax: (512) 623-6701
TTrainor@bmpllp.com

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EXHIBIT 6

Petteway Email re in camera Review of Four Emails

Valencia Richardson

From: Bernadette Reyes <bernadette@uclavrp.org>
Sent: Wednesday, April 12, 2023 5:32 PM
To: Ruben_Castro@txs.uscourts.gov
Cc: Angela Olalde; Shawn Sheehy; Meza, Catherine (CRT); Sharon Norwood; Joseph Russo; Jordan Raschke Elton; Dallin Holt; Jonathan Lienhard; Jason Torchinsky; Mateo Forero; schen@texascivilrightsproject.org; Valencia Richardson; bernadette@uclavrp.org; chad@brazilanddunn.com; KGarrett@willkie.com; Gear, Bruce (CRT); hani@texascivilrightsproject.org; hiliaryhklein@scsj.org; Jayaraman, Tharuni (CRT); joaquin@texascivilrightsproject.org; RMancino@willkie.com; neil@ngbaronlaw.com; Newkirk, Zachary (CRT); nas@naslegal.com; MPolizzano@willkie.com; ASilberstein@willkie.com; Simone Leeper; sonni@uclavrp.org; JSuriani@willkie.com; DVall-Ilobera@willkie.com; Wake, Brittany (CRT); Zachary@texascivilrightsproject.org; MZhu@willkie.com; Smith, K'Shaani (CRT); Mark Gaber
Subject: Fwd: 3:22-cv-00057 Honorable Terry Petteway et al v. Galveston County, Texas et al
Attachments: DEFS00027959.pdf; DEFS00027884.pdf; DEFS00011236.pdf; DEFS00011258.pdf

Good Afternoon Mr. Castro:

Per the Discovery hearing today attached please find the redacted emails that Judge Edison agreed to review in camera to decide on whether or not attorney client privilege allows for the redactions in the attached emails. As mentioned, Petteway Plaintiff's position is that there is no such basis in attorney client privilege for withholding information in these emails. It is my understanding that Defendants will be sending the unredacted versions of the emails for Judge Edison to review.

As noted during the hearing, Judge Edison agreed to review and decide this issue prior to the deposition of Thomas Bryan scheduled to take place on April 17, 2023. Please let me know if there is any other information you may need from me.

Best,
Bernadette

--

Bernadette Reyes
(she/her/hers)
Voting Rights Counsel
UCLA Voting Rights Project

EXHIBIT 7

Letter re in camera Review of Text Message

Holtzman Vogel

HOLTZMAN VOGEL BARAN TORCHINSKY & JOSEFIAK PLLC

April 19, 2023

VIA E-MAIL

Magistrate Judge Andrew W. Edison
U.S. District Court for the Southern District of Texas
c/o: Ruben Castro (Ruben_Castro@txs.uscourts.gov)

Re: *In Camera* Review of Text Messages Produced by Defendants
Petteway, et al. v. Galveston County, et al., Civil Action No. 3:22-cv-00057

Your Honor,

On April 18, 2023, Defendants made a supplemental production in response to Plaintiffs' First Requests for Production. That production includes the following document:

- DEFS00031806: String of text messages occurring from October 14, 2021 to October 26, 2021 between Phillip Gordon (redistricting counsel for Galveston County) and Thomas Bryan (map-drawer/technical consultant retained by Galveston County's redistricting counsel). Defendants redacted some of the messages that occurred on the evening of October 26, 2021 on the ground that they are covered by the attorney-client privilege.

The parties request that the Court conduct an *in camera* review of the unredacted text messages in question, along with the other materials already before the Court. Attached to this letter is a redacted version of the string of text messages. Defendants are sending the unredacted version under separate cover. Below are the parties' positions regarding these text messages.

Plaintiffs' Position

In addition to the reasons previously briefed in the motion to compel, these text messages are not privileged because they occurred on or after October 21, 2021. In their motion to compel briefing, Defendants took the position that Mr. Bryan's work during this time period was not subject to attorney-client privilege because the maps were no longer in draft form and were substantially the same as those that were released to the public for consideration. Given that, Mr. Bryan's communications with Defendants' counsel during this time likewise are not privileged. Defendants have not asserted these communications constitute attorney work product, but they likewise cannot have been primarily in anticipation of litigation for the same reasons as the other documents at issue.

Defendants' Position

The text messages between Mr. Bryan and Mr. Gordon were properly redacted because they were attorney-client privileged communications. The messages concern inquiries and responses exchanged between Mr. Bryan and redistricting counsel concerning the draft Commissioners Court precinct proposals' compliance with federal, State, and County legal

HOLTZMAN VOGEL BARAN TORCHINSKY & JOSEFIAK PLLC

requirements. As Defendants stated in their Opposition to Plaintiffs' Motions to Compel, the attorney-client privilege squarely covers interactions "from client to attorney seeking legal advice," as well as "all documents created by the attorney" that are responsive to such requests. Defs.' Opp. to United States' Mot. to Compel at 14 (ECF 107) (citing *United States v. Davis*, 636 F.2d 1028, 1040 (5th Cir. 1981)), *and see* Defs.' Opp. to Petteway Pls.' Mot. to Compel at 15 (ECF 108).

We thank the Court for its time and consideration, and look forward to the Court's resolution of this matter.

Respectfully,



Shawn T. Sheehy
Counsel for Defendants

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION

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

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

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

**[PROPOSED] ORDER GRANTING CONSENT MOTION OF NAACP
PLAINTIFFS AND PETTEWAY PLAINTIFFS TO SUPPLEMENT MOTION TO
COMPEL PRODUCTION OF DOCUMENTS**

Before the Court is the Joint Motion of NAACP Plaintiffs, Petteway Plaintiffs, and Defendants to Supplement Motion to Compel Production of Documents, Doc. 102, to encompass certain documents identified in Defendants' Supplemental Privilege Log produced on April 14, 2023, and documents recently provided to the Court for *in camera* review including document identified as DEFS00031696 subject to a claw-back notice from Defendants, four redacted emails between Mr. Oldham and Mr. Bryan, and redacted text messages of Mr. Bryan.

Upon consideration, it is hereby

ORDERED that the Motion is **GRANTED**.

The Court shall hereby incorporate the documents challenged by Plaintiffs from Defendants April 14, 2023 Supplemental Privilege Log as well as document subject to Defendants' claw-back notice and identified as DEFS00031696, four redacted emails between Mr. Oldham and Mr. Bryan, and redacted text messages of Mr. Bryan into its consideration of the Motion to Compel and its *in camera review* of documents in relation to same.

SO ORDERED and SIGNED this ___ day of _____, 2023.

Judge Andrew M. Edison
United States Magistrate Judge