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

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

DEFENDANTS' EXHIBIT LIST

Defendants Galveston County, Texas, Hon. Mark Henry in his official capacity as Galveston County Judge, and Dwight D. Sullivan in his official capacity as Galveston County Clerk ("Defendants"), submit their Exhibit List. Defendants may also rely upon exhibits on file with the Court and discovery responses provided by the parties in this case.

No.	Description	Offer	Obj.	Date Admit	Date Deny
DX-001	2006-4-10 GDN Article "Committee finds no patterns of discrimination" - DEFS00040002-03				
DX-002	2007-7-3 GDN Article "Meeting to mull police brutality claims" - DEFS00040066-68				
DX-003	2010-9-14 Article: Hurricane Ike Awakened Region to Dire Flooding Threats - DEFS00040057-61				
DX-004	2011-1-1 2011 Commissioners Precinct Map - DEFS00036815				
DX-005	2011-1-1 Old Commissioner Map Hi Res - DEFS00020431				
DX-006	2011-10-14 Trainor Commissioner Preclearance letter to DOJ - DEFS00031633- 31644				
DX-007	2011-4-6 Galveston County Beach Erosion Task Force Meeting Packet - DEFS00040010- 50				
DX-008	2022-4-22 Gordon email to DOJ re: Galveston Election Data with XLS attachment - US0001320-21				
DX-009	2011-6-2 Approval of CC Resolution - US0002194-97				
DX-010	2011-6-27 Compian email regarding boxer Jack Johnson statue - NAACP00001077-79				
DX-011	2012-3-11 GCD Email re: "We need your support Tuesday in Galveston!" when Democrats stand up an fight, WE WIN - NAACP00001467-68				
DX-012	Withdrawn (JX 2)				
DX-013	Withdrawn (JX 3)				

No.	Description	Offer	Obj.	Date Admit	Date Deny
DX-014	Galveston County's Submission under Section 5, Voting Rights Act of the 2011 redistricting of commissioner precincts for Galveston County, Texas and Request for Expedited Consideration (October 14, 2011) (DEFS00031618-29)				
DX-015	2011-12-1 2011 US Phone memos - US0002276-2309				
DX-016	2011-12-12 Holmes email with DOJ - US0002008-36				
DX-017	2012-1-10 "current voter list" - DEFS00031099				
DX-018	Withdrawn (JX 6)				
DX-019	2012-3-11 GCD and Criss Email re Commissioners Court "REPUBS" - NAACP00001467-1468				
DX-020	2012-3-12 2012 DRAFT Letter to the Court re: Commissioner Compromise map - NAACP00001277-1282				
DX-021	2012-3-12 GCD email (Let's put the fear of the voters into Republicans!) - NAACP00001457-1458				
DX-022	2012-3-12 Gulf Coast Interfaith Letter to Commissioners (signed) - US0001722-26				
DX-023	2012-3-22 Article - Another redistricting map set for DOJ				
DX-024	Withdrawn (JX 8)				
DX-025	2012-3-23 Article - Commissioners approve new redistricting map				
DX-026	2012-3-23 Compian Email to DOJ - US0001163				
DX-027	2012-5-10 Public Service Announcement on Public Housing - NAACP00001073-75				

No.	Description	Offer	Obj.	Date Admit	Date Deny
DX-028	2014-2-10 Article "What a way to begin Black History Month" - DEFS0040122-23				
DX-029	2018-1-1 Republican primary voters 2018 - DEFS00030209				
DX-030	2019-4-25 AP Article - Some women of color frustrated by quoting Roxy Williamson - DEFS0040096-98				
DX-031	2019-8-6 Article "New video released of controversial rope-led arrest in Galveston" - DEFS00040069-71				
DX-032	2019-10-25 Email re: election day locations with maps attached - DEFS00008042				
DX-033	2019-12-8 Texas Tribune Article: Top Texas Republicans pressure county chair to resign over racist text - DEFS00040127-31				
DX-034	2020-1-1 Galveston County General Election Cumulative Results Report - DEFS00031067- 73				
DX-035	2020-1-1 Republican primary voters 2020 - DEFS00030211				
DX-036	2020-2-21 Johnson tweet re ad - DEFS00031247				
DX-037	2020-2-23 Johnson tweet re ad - DEFS00031248				
DX-038	2020-3-27 First Amended Complaint For Injunctive Relief - Doc. No. 16, No. 5:20-CV-00035; Bruni, et. al. v. Hughs, in the SD Tex. Laredo Division				
DX-039	2020-7-10 GDN Article "There's another story behind the 'Dignified Resignation' statute" - DEFS00040112-15 (Comments Redacted)				

No.	Description	Offer	Obj.	Date Admit	Date Deny
DX-040	2020-9-14 GDN Article "Galveston grocery store's 'Planet of the Apes' mural sparks controversy" - DEFS00040051-54 (comments redacted)				
DX-041	2020-11-1 Nov General Election - DEFS00031073				
DX-042	2020-11-20 Article - Safety, not shenanigans, left church off island polling site list DEFS00040004-8				
DX-043	2020-11-25 Email from Paul Ready to Henry, Drummond and Van Horn re Galveston County, Texas proposed engagement - 2020 census redistricting - DEFS00028158-28164				
DX-044	Withdrawn (JX 9)				
DX-045	Withdrawn (JX 10)				
DX-046	2021-1-13 Saludis email re redistricting preparations - DEFS00019154				
DX-047	Withdrawn (JX 11)				
DX-048	Withdrawn (JX 12)				
DX-049	2021-1-29 Holmes email to self re galv cnty profile - DEFS00029528				
DX-050	2021-2-1 Sigler and Shannon email to Holmes - DEFS00030084-87				
DX-051	2021-2-1 Email providing race counts to Holmes - DEFS00030080-83				
DX-052	Withdrawn (JX 12)				
DX-053	2021-4-11 Kimberly Yancy email with link to TedX on redistricting - NAACP00001445-1446				
DX-054	2021-4-11 Lucille McGaskey and Kimberly Yancy emails re: Hiring Dale Oldham - NAACP00001441-42				

No.	Description	Offer	Obj.	Date Admit	Date Deny
DX-055	2021-4-12 GCDP Email on Neil Barron discussion on redistricting - NAACP00001179				
DX-056	2021-4-12 Lillie Ann Aleman Email re: GDN Article on hiring Dale Oldham - NAACP00001435-37				
DX-057	2021-4-12 GCD email re redistricting zoom session with Neil Barron "a local Democrat lawyer" - Holmes 001336-1337				
DX-058	2021-5-20 Drummond Email to Ready and Johnson re: Asked and Answered! - DEFS00036320-22				
DX-059	2021-5-20 Email from R. Eldridge to Johnson - DEFS00004181-4183				
DX-060	2021-8-4 GALLUP Article - No preferred racial term amongst most black, hispanic adults -				
DX-061	2021-8-12 GDN Article Galveston County population tops 350K (DEFS00040089-95)				
DX-062	2021-8-13 Holmes email to self re census data - DEFS00016256				
DX-063	2021-8-24 Johnson to Commissioners re Current Voter Count by Precinct - DEFS00003808-09				
DX-064	Withdrawn (JX 14)				
DX-065	Withdrawn (JX 15)				
DX-066	Withdrawn (JX 16)				
DX-067	Withdrawn (JX 18)				
DX-068	Duplicate withdrawn				
DX-069	2021-9-10 Leichty email to Holmes to set up meeting with counsel - DEFS00016258				

No.	Description	Offer	Obj.	Date Admit	Date Deny
DX-070	2021-9-10 GALLUP Art: US Approval of Interracial Marriage at New High of 94% - DEFS00040229-235				
DX-071	2021-9-11 Williamson email to groups: Redistricting Testimony needed!- (DEFS00016259)				
DX-072	Withdrawn (JX 19)				
DX-073	Withdrawn (JX 20)				
DX-074	2021-9-16 Clark conference invite with GC counsel - DEFS00011693				
DX-075	Withdrawn (JX 21)				
DX-076	Withdrawn				
DX-077	Withdrawn (JX 23)				
DX-078	Withdrawn (JX 22)				
DX-079	2021-9-20 Holmes conference invite with GC Counsel - DEFS00016260				
DX-080	2021-09-20 Ready email to Holmes re census data and Dale Oldham summary - (DEFS00030116-30117)				
DX-081	2021-9-21 Holmes email to self re redistrict ing toolbox - DEFS00029548				
DX-082	Withdrawn (JX 24)				
DX-083	2021-9-23 sigler email re Holmes projection requests - DEFS00004607				
DX-084	2021-9-23 Conference call invite Holmes and redistricting counsel - DEFS00016262				
DX-085	2021-9-27 Sigler email to Shannon - DEFS00010406-411				
DX-086	2021-9-27 Sigler email to Shannon re holmes does not have access - DEFS00010412				

No.	Description	Offer	Obj.	Date Admit	Date Deny
DX-087	2021-9-28 Calendar invite for call with Judge Henry, Commissioner Apffel, Ready and Oldham - DEFS00029174				
DX-088	2021-10-11 Roxy email to Holmes with Zoom link - DEFS00029581-29582				
DX-089	2021-10-11 Williamson Email to Holmes with zoom Info - (DEFS00029583-84)				
DX-090	2021-10-14 Williamson complaint to Tx Senate - Williamson Ex 11				
DX-091	Withdrawn (JX 25)				
DX-092	2021 10 22 Oldham email to Bryan re current voter count DEFS00036213, DEFS00035200 (native printed to PDF)				
DX-093	2021-10-22 Jed Webb zoom link to Holmes on redistricting call - DEFS00016263				
DX-094	2021-10-25 Ready email to Oldham re: Galveston County Maps - DEFS00036333				
DX-095	2021-10-26 Holmes email to Roxy re community advocacy - DEFS00029586				
DX-096	2021-10-26 Ready email to Bryan and Oldham - DEFS00036216-18				
DX-097	2021-10-26 Williamson email to Holmes Fwd: letter to Galveston County Commissioners Court - DEFS00029587-88				
DX-098	2021-10-28 Drummond email re: delay - DEFS00036345-47				
DX-099	2021-10-29 Roxy Williamson Email on Redistricting - NAACP00000930-38				
DX-100	2021-10-29 Lofton Email with Roxy Williamson re: quick call - NAACP00001531- 34				
DX-101	Withdrawn (JX 31)				

No.	Description	Offer	Obj.	Date Admit	Date Deny
DX-102	Withdrawn (JX 29)				
DX-103	Withdrawn (JX 30)				
DX-104	Withdrawn (JX 28)				
DX-105	2021-10-29 Drummond email to Oldham Ready re ltr from League of Women Voters - DEFS00031235				
DX-106	2021-10-29 Judge Mark Henry Facebook Post - DEFS00031054				
DX-107	Withdrawn (JX 28)				
DX-108	Withdrawn (JX 37)				
DX-109	2021-10-30 CLS Concerns/Redistricting changes - DEFS00011040-11041				
DX-110	2021-10-31 Facebook post from J. Giusti with proposed maps and link - Giusti Ex. 7				
DX-111	Withdrawn (JX 34)				
DX-112	2021-11-1 Apffel email to Flanagan re maps - DEFS00003811				
DX-113	2021-11-2 Crowd Redistricting 101 PowerPoint Presentation - NACP0000900-919				
DX-114	Withdrawn (JX 35)				
DX-115	2021-11-2 Registered voters in Galv County - DEFS00029722				
DX-116	Withdrawn (JX 33)				
DX-117	2021-11-3 TDW Email regarding November 4, 2021 meeting with Commissioner Holmes - NAACP00001425				
DX-118	2021-11-3 GDN Article "Political Buzz: County's redistricting might cut out lone Democrat" - DEFS00033931-35				
DX-119	Withdrawn (JX 36)				

No.	Description	Offer	Obj.	Date Admit	Date Deny
DX-120	2021-11-4 Williamson Email to groups - NAACP00000517-518				
DX-121	2021-11-4 Roxy email re redistricting - DEFS00016264-16265				
DX-122	Withdrawn (JX 37)				
DX-123	2021-11-4 Williamson text to Heidi (Holmes 000310)				
DX-124	2021-11-4 Tex. Democratic Women of Galv. County Meeting Agenda - US0001539-40				
DX-125	2021-11-5 GCDP Email string on public comment to maps - NAACP00001149-53				
DX-126	2021-11-5 GCDP Email string on public comment to maps - Holmes 001344-46				
DX-127	2021-11-5 Email providing meets and bounds suggestions for map 1 - DEFS00030992-97				
DX-128	2021-11-7 Leon Phillips Email re: Redistricting Maps - NAACP00001498				
DX-129	Withdrawn (JX 42)				
DX-130	2021-11-7 Gordon email to GCD re Holmes meeting - Holmes 001349				
DX-131	2021-11-8 Email (NAACP00000897) - NAACP00000897				
DX-132	2021-11-8 Dunn emails with Holmes with dates - Holmes 001652-54				
DX-133	Invoices from Dunn Rios and Angle - Holmes 001655-58				
DX-134	Withdrawn (JX 41)				
DX-135	11/9/2021 Email distribution of November 12, 2021 Agenda - DEFS00029851-54				
DX-136	2021-11-10 Roxy Williamson Email re: Redistricting - NAACP00001363-64				

No.	Description	Offer	Obj.	Date Admit	Date Deny
DX-137	2021-11-10 Holmes email to Clift re email - DEFS00029596				
DX-138	2021-11-10 Martinez email re Constable request - DEFS00030062-64				
DX-139	2021-11-10 Email and Letter from Galveston constituent re Bolivar- DEFS00011042- DEFS00011047				
DX-140	2021-11-11 Roxy Williamson Email re: Houston Public Media article - NAACP00001361-62				
DX-141	2021-11-11 Roxy Williamson email re: Galv. County Republic Party email - NAACP00001500-03				
DX-142	2021-11-11 Roxy Email re: redistricting townhall (redacted) - Holmes 001356-58				
DX-143	2021-11-11 GCD email re: Holmes talk on redistricting - Holmes 001430				
DX-144	2021-11-11 Dunn emails and Angle maps - Holmes 000319-Holmes 000346				
DX-145	2021-11-12 Roxy Williamson email re: November 11, 2021 Redistricting Task Force meeting - NAACP00001494-95				
DX-146	2021-11-12 Special Meeting Agenda - DEFS00029853-54				
DX-147	2021-11-12 Holmes maps from meeting - DEFS00011474-79				
DX-148	2021-11-12 Online Public Comments - DEFS00028664-29118				
DX-149	2021-11-12 Corrected Transcript of Commissioners Court Hearing (DEFS00031702-805)				
DX-150	2021-11-12 November meeting speaker sign in sheets - DEFS00031699-31701				

No.	Description	Offer	Obj.	Date Admit	Date Deny
DX-151	2021-11-12 Comm Court Order Adopting Map 2 - DEFS00011470-11473				
DX-152	Withdrawn (JX 42)				
DX-153	2021-11-12 Davidson email to TJ Aulds with Public Comment summary - DEFS00003893				
DX-154	2021-11-15 Johnson email re: County Commissioner Possible Precinct - DEFS00016754-16755				
DX-155	2021-11-22 Holmes email to DOJ with Maps 1 and 2 and data - DEFS00029597-602				
DX-156	2021-11-30 Tyler email to self re Holmes notes - DEFS00029388				
DX-157	2021-11-30 Drummond email re redistricting process - DEFS00029387				
DX-158	2021-12-7 TCRP email to commissioners re preservation notice - DEFS00027763-DEFS00027767				
DX-159	2022-3-28 Fragoso email with primary election returns - DEFS00009655-9679 (-56 submitted electronically)				
DX-160	2022-1-2 Registered voters in Galv County - DEFS00029729				
DX-161	2022-1-10 Roxy Williamson email with DOJ attorney regarding polling locations - US0001509-12				
DX-162	2022-1-20 Text string provided to DOJ - US0001488-1506				
DX-163	2022-3-1 GC Primary Results - DEFS00031071				
DX-164	2022-3-28 Holmes emails with attorney Chen - Holmes 000574-Holmes 000580				
DX-165	2022-4-8 Artitcle - Galveston County Democrats call for action				

No.	Description	Offer	Obj.	Date Admit	Date Deny
DX-166	2022-4-15 Compian email with DOJ attorney re: materials and meeting - US0001449-50				
DX-167	2022-4-16 Mary Patrick email to DOJ re: meeting - US0001448				
DX-168	2022-4-21 Email - US0001262-64				
DX-169	2022-4-25 Compian email to DOJ with population data attachment - US0001322-49				
DX-170	2022-5-2 GDN Article "Rumor-mongers should put up or shut up about Galveston mayor" - DEFS00040084-85				
DX-171	2022-5-13 Holmes email to sigler re shapefiles - DEFS00020523-24				
DX-172	2022-5-13 Shannon email to Siglerre shapefiles - DEFS00031029				
DX-173	2022-5-13 Sigler email to Holmes with shapefiles - DEFS00031030				
DX-174	2022-5-24 Republican Primary Runoff - DEFS00031068				
DX-175	2022-5-31 US Gov Web - www.census.gov "2020 Census Timeline of Important Milestones" -				
DX-176	2022-8-5 Email with Election Board Agenda - DEFS00040000-01				
DX-177	2022-8-31 Bench Trial Ruling in No. 3:13-308 - Dkt. 78				
DX-178	2022-11-1 Holmes email to self re article on coalition districts - Holmes 001184-1222				
DX-179	2021-11-18 Mother Jones Article (www.motherjones.com_2022-12-09-21-55-16) - NAACP00000001-9				
DX-180	2021-11-09 County's proposed maps break voting power (NAACP00000018-23; Defendants are using clearer copy from online)				

No.	Description	Offer	Obj.	Date Admit	Date Deny
DX-181	2021-12-8 Article - Lawsuit could be next in fight against redrawn (NAACP00000024-27)				
DX-182	Withdrawn				
DX-183	2022-12-28 Article: Major step for 'Ike Dike' has local leaders optimistic - DEFS00040062-65				
DX-184	Withdrawn				
DX-185	2023-4-20 DOJ Interrog Responses on Interviews				
DX-186	2023-4-20 Armstrong Description from GC Website - https://www.galvestoncountytx.gov/our- county/commissioners/commissioner-4				
DX-187	2020-3-3 Cumulative Results Report 2020 Presidential Primary - DEFS00013518-13537				
DX-188	2023-5-9 GC General Election returns (2020 General) - DEFS00027066, 27068-27096, 27098-27126				
DX-189	Turnout and voter registration data for Galveston County maintained by Galveston County which have been produced in this case - DEFS00031099 (native)				
DX-190	Withdrawn				
DX-191	Withdrawn				
DX-192	Withdrawn				
DX-193	Bench Trial transcripts Vols 1-3, Petteway v. Galveston County, No. 3:13-cv-308 (S.D. Tex. 2013)				
DX-194	Galveston County election results which have been produced in this case - https://results.texas-election.com/races				

No.	Description	Offer	Obj.	Date Admit	Date Deny
DX-195	Texas Elections Results 1992-present available at Texas Secretary of State's Office - https://elections.sos.state.tx.us/index.htm				
DX-196	Withdrawn (JX 13)				
DX-197	Email from Johnson re: Redistricting Scheduling - DEFS00007866-7868				
DX-198	Email with Johnson and Sigler re: Maps for redistricting - DEFS00008053-8055				
DX-199	Petteway Plaintiffs' Amended Response to Defendants' First Discovery requests				
DX-200	1977-1-11 Arlington Heights opinion 429 US 252 (1977)				
DX-201	1986-6-30 Thornburg v. Gingles - 478 US 30 (1986)				
DX-202	1993-8-23 LULAC v. Clements - 999 F.2d 831 (5th Cir. 1993)				
DX-203	2021-7-1 Brnovich v. Democratic Nat'l Comm., 141 S.Ct. 2321 (2021)				
DX-204	2021-12-31 Open Meetings Law (Tex. Gov't Code 551.043)				
DX-205	2007-6-1 Political Research Quarterly art: Black-Brown Coalitions in Local School Board Elections - DEFS00040191-203				
DX-206	2008-10-1 Political Science & Politics: Should they dance with the one who brung 'em? Latinos and the 2008 Presidential election - DEFS00040204-211				
DX-207	2013-1-1 The Journal of Politics: The Return of Old-Fashioned Racism - DEFS00040215-228				
DX-208	2016-12-1 The R Journal art: eiCompare: Comparing Ecological inference estimates across EI and EI:RxC - DEFS00040180-90				

No.	Description	Offer	Obj.	Date Admit	Date Deny
DX-209	2017-3-20 Package eiCompare manual - DEFS00040135-53				
DX-210	2018-10-1 American Economic Review Art: Why Did the Democrats Lose the South? - DEFS00040259-99; https://doi.org/10.1257/aer.20161413				
DX-211	2018-10-1 Chart from AER Article, pg 2837 - DEFS00040177; https://doi.org/10.1257/aer.20161413				
DX-212	2020-10-8 Political Behavior art.: The Inseparability of Race and Partisanship in the United States - DEFS00040236-258				
DX-213	2023-2-19 Package eiPack manual - DEFS00040154-40175				
DX-214	2023-3-17 Alford Report, Fig 1 - DEFS00040176				
DX-215	2023-3-17 Alford Report, Fig 2 - DEFS00040177				
DX-216	2023-3-17 Alford Report, Fig 3 - DEFS00040178				
DX-217	2023-3-17 Alford Report, Table 2 - DEFS00040212				
DX-218	2023-3-17 Alford Report, Table 3 - DEFS00040213				
DX-219	2023-3-17 Alford Report, Table 5 - DEFS00040214				
DX-220	1900-1-0 David H. Kaye & David A. Freedman, Reference Guide on Statistics, Reference Manual on Scientific Evidence 211 (3rd ed.) -				
DX-221	2023-3-31 Owens Report Table 1 Fig 1 pp5-6 (redacted)				

No.	Description	Offer	Obj.	Date Admit	Date Deny
DX-222	2023-3-31 Owens Resp. Krochmal Rpt. Table 2 p6				
DX-223	2023-03-31 Owens Am Report Fig 7 p13; BCVAP_blocklevel_331				
DX-224	2023-03-31 Owens Am Report Fig 6 p12 (Redacted); BCVAP_vtdlevel				
DX-225	2023-03-31 Owens Am Report Fig 12 Cooper Map pct 3 pg 23 (Redacted); Beach_access				
DX-226	2023-03-31 Owens Am Report Fig 11 Cooper Map pct 3 pg 21 (Redacted); Cooper1_P3_overlayHISPVTD				
DX-227	2023-03-31 Owens Am Report Fig 9 Cooper Map pct 3 pg 19 (Redacted); Cooper2_P3HCVAP				
DX-228	2023-03-31 Owens Am Report Fig 10 Fairfax Map pg 20 (Redacted); Fairfax_split				
DX-229	2023-03-31 Owens Am Report Fig 1 pg 6 (Redacted); Pop_Change_cities				
DX-230	2023-03-31 Owens Am Report Fig 13 pg 24 (Redacted); Robinson_auto				
DX-231	2023-03-31 Owens Am Report p9 12-13 (Redacted)				
DX-232	Demonstrative Exhibit - Cooper Exhibit D				
DX-233	Cooper Report, Fig 1_Redacted				
DX-234	Cooper Report, Fig. 4_Redacted				
DX-235	2023-5-12 Voting age population document -				
DX-236	2023-1-13 Report of Bill Cooper EX C (PLTs); Cooper Fig 4 - Redacted (provided in PDFs labeled DX236a-b)				
DX-237	2023-1-20 Cooper Exhibit D (provided in PDFs labeled DX232a-l)				
DX-238	Cooper Report, Illustrative Map 2_Redacted				

No.	Description	Offer	Obj.	Date Admit	Date Deny
DX-239	Cooper Report, Illustrative Map 3_Redacted				
DX-240	Cooper Report, Illustrative Map 1_Redacted				
DX-241	2023-01-13 Fairfax Illustrative Plan 1, Fig 1				
DX-242	2022-10-29 Houst. Chronicle Art: Why it's harder than ever to reliably poll - https://www.houstonchronicle.com/politics/tex as/article/Polling-Texas-voters-has-never-beenmore-17541736.php				
DX-243	2023-1-1 Statement on Standards of Professional Conduct - American Historical Association - Krochmal Ex 6				
DX-244	2011-3-1 Art: On the meaning measurement, and implications of racial resentment - Lafleur Ex 3				
DX-245	2021-2-3 Annual Review of Political Science: The persistence of racial cues and appeals in american elections - Lafleur Ex 5				
DX-246	2023-4-23 Description of DRA 2020 "Demographic Data" - https://davesredistricting.org/maps#aboutdata				
DX-247	2023-4-23 Texas Tribune Data on GISD (accountability ratings 2018-19) (DEFS00040072-83)				
DX-248	Barreto Report, Appendix A, Table 1 -				
DX-249	Barreto Report, Appendix A, Table 2 -				
DX-250	Journal of Politics: What leads racially resentful voters to choose black candidates - Lafleur Ex 4				
DX-251	Oskooii Report, Ex C, Fig 8 -				
DX-252	Oskooii Report, Ex C, Fig 9 -				
DX-253	2023 01 13 Oskooii Report, Tables 1-2, Fig 11, 15, Figs 8-10 Ex C (Redacted)				

No.	Description	Offer	Obj.	Date Admit	Date Deny
DX-254	Rush Report, Statistics (pg 20) (Redacted)				
DX-255	Rush Report (Demonstratives), 28 - Rush Demonstrative 1, 2, 3 (provided in PDFs labeled DX255a-c)				
DX-256	Trounstine Report, A-27-28 -				
DX-257	Trounstine Report, A-30-33				
DX-258	Trounstine Report, A-19-20				
DX-259	2021-10-15 - Spreadsheet - DEFS00031696				
DX-260	2021-10-17 - Spreadsheet - DEFS00036197				
DX-261	2021-10-19 - Spreadsheet - DEFS00036204				
DX-262	2021-10-19 - Spreadsheet (updated) - DEFS00036208				
DX-263	2021-10-21 - Spreadsheet - DEFS00011251				
DX-264	2021-10-22 - Spreadsheet - DEFS00036212				
DX-265	2021-10-22 - Spreadsheet - DEFS00027895				
DX-266	2021 10 22 - Spreadsheet - DEFS00011262				
DX-267	2021-08-13 - Active Voters in Galveston County - DEFS00035200				
DX-268	2021-10-26 - Spreadsheet - DEFS00011286				
DX-269	2021-10-27 Email from Bryan to Gordon DEFS00028012-15 (Attachments (DEFS00028013-28015) produced in native format)				
DX-270	Withdrawn				
DX-271	2021-10-28 - Spreadsheet - DEFS00028020				
DX-272	2021-10-28 - Spreadsheet - DEFS00035518				
DX-273	Draft Optimal D PDF - DEFS00036813- DEFS00036814				
DX-274	Withdrawn (JX 7)				

No.	Description	Offer	Obj.	Date Admit	Date Deny
DX-275	Optimal Geo Map PDF - DEFS00036819				
DX-276	2021-10-21 - Galveston Map 2 - DEFS00027893				
DX-277	2021-10-21 - Galveston Map 1 - DEFS00027894				
DX-278	Galveston Map 1 with substantially split precincts - DEFS00027901				
DX-279	Galveston Map 2 with substantially split precincts - DEFS00027902				
DX-280	2021-10-28 - Galveston Map 1 - DEFS00028017				
DX-281	2021-10-28 - Galveston Map 2 - DEFS00028018				
DX-282	Fair Lines Data on Galveston Demographic Shifts - DEFS00030117; DEFS00030116				
DX-283	2021-10-29 Email from Bryan to Oldham DEFS00028027-34; 32925-32939 - Map 1/Map 2 shapefiles - (DEFS00028029-34;32926- 32939 produced in native format)				
DX-284	2021-10-15 Emails between Tom Bryan and Phil Gordon and Jason Torchinsky DEFS00036191-DEFS00036193				
DX-285	2021-10-16 Emails between Tom Bryan and Phil Gordon and Jason Torchinsky DEFS00027851				
DX-286	Withdrawn (JX 25)				
DX-287	2020 11 05 Email from Sullivan to Commissioner Holmes with election night reporting results (DEFS00004117-18)				
DX-288	2020 11 16 Email from Sullivan to Comm. Holmes with election night reporting results (DEFS00004121-22)				

Respectfully Submitted,

HOLTZMAN VOGEL BARAN TORCHINSKY & JOSEFIAK PLLC

Dallin B. Holt
Texas Bar No. 24099466
S.D. of Texas Bar No. 3536519
Jason B. Torchinsky*
Shawn T. Sheehy*
dholt@holtzmanvogel.com
jtorchinsky@holtzmanvogel.com
ssheehy@holtzmanvogel.com
15405 John Marshall Hwy
Haymarket, VA 2019
P: (540) 341-8808
F: (540) 341-8809

*admitted pro hac vice

PUBLIC INTEREST LEGAL FOUNDATION

Joseph M. Nixon
Federal Bar No. 1319
Tex. Bar No. 15244800
J. Christian Adams*
South Carolina Bar No. 7136
Virginia Bar No. 42543
Maureen Riordan*
New York Bar No. 2058840
107 S. West St., Ste. 700
Alexandria, VA 22314
jnixon@publicinterestlegal.org
jadams@publicinterestlegal.org
mriordan@publicinterestlegal.org
713-550-7535 (phone)
888-815-5641 (facsimile)

By: /s/ Joseph Russo

Joseph Russo (Lead Counsel)
Fed. ID No. 22559
State Bar No. 24002879
jrusso@greerherz.com
Jordan Raschke
Fed. ID No.3712672
State Bar No. 24108764
jraschke@greerherz.com
1 Moody Plaza, 18th Floor
Galveston, TX 77550-7947
(409) 97-3200 (Telephone)
(866) 422-4406 (Facsimile)

GREER, HERZ & ADAMS, L.L.P.

Angie Olalde Fed. ID No. 690133 State Bar No. 24049015 2525 S. Shore Blvd. Ste. 203 League City, Texas 77573 aolalde@greerherz.com (409) 797-3262 (Telephone) (866) 422-4406 (Facsimile)

Counsel for Defendants

^{*}admitted pro hac vice

CERTIFICATE OF SERVICE

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

/s/ Angie Olalde