

**IN THE UNITED STATES DISTRICT COURT FOR THE
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

LEAGUE OF UNITED LATIN AMERICAN
CITIZENS, *et al.*,

Plaintiffs,

v.

GREG ABBOTT, in his official capacity as
Governor of the State of Texas, *et al.*,

Defendants.

CIVIL ACTION NO.

3:21-cv-00259-DCG-JES-JVB

[Consolidated Action: Lead Case]

**LULAC PLAINTIFFS' MOTION FOR LEAVE TO EXCEED PAGE LIMIT FOR
PRIVATE PLAINTIFFS' SECOND SUPPLEMENTAL BRIEF REGARDING THE
LEGISLATIVE PRIVILEGE (LULAC V. PATRICK REMAND)**

Pursuant to Local Rule CV-7(C)(2), LULAC Plaintiffs respectfully request a two-page enlargement of the page limitation for Private Plaintiffs' Second Supplemental Brief Regarding the Legislative Privilege (*LULAC v. Patrick Remand*), attached as Exhibit A.

LULAC Plaintiffs seek leave to exceed the page limit in order to fully address the factual and legal bases of their brief. Granting this motion will not prejudice any party. Counsel for all Plaintiffs do not oppose this request, and counsel for Defendants did not respond with their position prior to the filing of this motion.

For the foregoing reasons, LULAC Plaintiffs respectfully request that the Court grant their motion for leave to file a brief that shall not exceed twelve pages in total.

Dated: August 10, 2023

Respectfully submitted,

/s/ Nina Perales

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Counsel for LULAC Plaintiffs

CERTIFICATE OF CONFERENCE

I hereby certify that, on August 10, 2023, counsel for LULAC Plaintiffs sent an email to confer with counsel for all parties concerning the subject of the instant motion. Counsel for all Plaintiffs are unopposed. Counsel for Defendants did not respond with their position prior to the filing of this motion.

/s/ Nina Perales

Nina Perales

CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that she has electronically submitted a true and correct copy of the above and foregoing via the Court's electronic filing system on the 10th day of August 2023.

/s/ Nina Perales _____
Nina Perales

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**[PROPOSED] ORDER GRANTING LULAC PLAINTIFFS' MOTION
FOR LEAVE TO EXCEED PAGE LIMIT FOR PRIVATE PLAINTIFFS' SECOND
SUPPLEMENTAL BRIEF REGARDING THE LEGISLATIVE PRIVILEGE
(LULAC V. PATRICK REMAND)**

Pending before the Court is LULAC Plaintiffs' Motion for Leave to Exceed Page Limit For Private Plaintiffs' Second Supplemental Brief Regarding the Legislative Privilege (*LULAC v. Patrick Remand*). Dkt. _____. The motion seeks leave to file a brief not exceeding 12 pages. Upon review of the request, and the lodged brief, the motion is GRANTED. The clerk is directed to ENTER the brief.

SO ORDERED and SIGNED this _____ day of _____ 2023.

HON. DAVID C. GUADERRAMA
UNITED STATES DISTRICT JUDGE

And on behalf of:

Hon. Jerry E. Smith
United States Circuit Judge
U.S. Court of Appeals, Fifth Circuit

-and-

Hon. Jeffrey V. Brown
United States District Judge
Southern District of Texas

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Defendants.

CIVIL ACTION NO.
3:21-cv-00259-DCG-JES-JVB
[Consolidated Action: Lead Case]

**PRIVATE PLAINTIFFS' SECOND SUPPLEMENTAL BRIEF REGARDING THE
LEGISLATIVE PRIVILEGE (LULAC V. PATRICK REMAND)**

LULAC Plaintiffs previously filed motions to compel the production of documents withheld by legislators, legislative staff, and the Lieutenant Governor (collectively, the “Respondents”) based on, among other things, assertions of the legislative privilege. *See* Dkts. 447 and 582.¹ The United States, in a motion to enforce filed before LULAC Plaintiffs’ motions, sought a number of the same documents. Dkt. 351.

On July 25, 2022, the Court granted the United States’ motion to enforce. Dkt. 467 at 27. Respondents appealed, and the Fifth Circuit stayed this Court’s July 25, 2022 Order pending the Fifth Circuit’s resolution of *LULAC Texas v. Hughes*, 68 F.4th 228 (5th Cir. 2023). *LULAC v. Patrick*, No. 22-50662, Dkt. 30 (5th Cir.). After *Hughes* was decided, the United States proposed

¹ Those individuals are: Lieutenant Governor Dan Patrick, State Senator Joan Huffman, Texas House of Representatives Speaker Dade Phelan, State Representative Todd Hunter, State Representative Brooks Landgraf, State Representative J.M. Lozano, State Representative Jacey Jetton, and State Representative Ryan Guillen (Dkt. 447); and Anna Mackin (Dkt. 582).

that the Fifth Circuit either remand the instant matter or allow the parties an opportunity to seek an indicative ruling from this Court. *See* Dkt. 715 at 1-2. On July 18, 2023, the Fifth Circuit vacated this Court’s July 25, 2022 Order and remanded the matter back to this Court; in that two-sentence order, the Fifth Circuit did not address the merits of the parties’ positions. *See* Dkt. 715-1. This Court then set forth a briefing schedule for the parties to address the impact of *Harkins* and *Hughes* on these documents. *See* Dkt. 719 at 1.

Pursuant to that schedule, Private Plaintiffs submit this brief to address documents that LULAC Plaintiffs sought and that were the subject of the Court’s now-vacated July 25, 2022 Order. For the reasons in LULAC Plaintiffs’ prior motions to compel, and in Private Plaintiffs’ June 24, 2023 supplemental brief regarding the legislative privilege (Dkt. 709) (“First Supplemental Brief”),² Private Plaintiffs respectfully request that the Court grant their motions as to those documents. *See* Dkts. 447 and 582. Those documents are listed in Exhibit A.³

I. After *Harkins* and *Hughes*, the Legislative Privilege Remains a Qualified Privilege That Must be Strictly Construed.⁴

Over 50 years ago, faced with the argument that the privilege protects “all conduct ‘related to the due functioning of the legislative process,’” the Supreme Court emphasized that it had never “in any sense impl[ie]d . . . that everything that ‘related’ to the office of a [legislator] was shielded

² In support of disclosure of the documents at issue here, Private Plaintiffs incorporate by reference and re-urge arguments made in LULAC Plaintiffs’ motions to compel, Dkts. 447 and 582, and in Private Plaintiffs’ First Supplemental Brief, Dkt. 709.

³ Private Plaintiffs listed some of these documents in their exhibits to their First Supplemental Brief. To aid the Court’s review, Private Plaintiffs note in the rightmost column of Exhibit A where in the First Supplemental Brief exhibits an entry previously appeared.

⁴ Private Plaintiffs respectfully disagree with the decisions in *Harkins* and *Hughes* regarding the legislative privilege, and hereby preserve their arguments in their earlier briefing regarding the legislative privilege, incorporated by reference here. *See* Dkt. 709, Ex. A (listing pending motions). As to the documents at issue here, Private Plaintiffs also maintain their previously filed joinders in motions filed by the United States. Dkts. 447 and 582.

by the [Speech or Debate] Clause.” *United States v. Brewster*, 408 U.S. 501, 513-14 (1972). The Court also noted that it would be neither “sound [nor] wise, simply out of an abundance of caution to doubly insure legislative independence, to extend the privilege beyond its intended scope, its literal language, and its history, to include all things in any way related to the legislative process.” *Id.* at 516.

The Court then put a finer point on that, stating that the legislative privilege applies only to “integral part[s] of the deliberative and communicative processes” and “only when necessary to prevent indirect impairment of such deliberations.” *Gravel v. United States*, 408 U.S. 606, 625 (1972). So, for example, “[a] promise to deliver a speech, to vote, or to solicit other votes at some future date is not” protected by the privilege. *United States v. Helstoski*, 442 U.S. 477, 490 (1979). “Likewise, a *promise* to introduce a bill is not a legislative act” protected by the privilege. *Id.* Thus, far from endorsing that the legislative privilege is “all-encompassing,” *Gravel*, 408 U.S. at 625, Supreme Court precedent has long focused on protecting only “inquir[y] into the *motives* of legislators,” *Bogan v. Scott-Harris*, 523 U.S. 44, 55 (1998) (emphasis added) (quoting *Tenney v. Brandhove*, 341 U.S. 367, 377 (1951)).

Neither *Harkins* nor *Hughes* deviated from that principle, especially in light of the Fifth Circuit’s earlier statement that the legislative privilege is “qualified” and “must be strictly construed.” *Jefferson Cmty. Health Care Ctrs., Inc. v. Jefferson Par. Gov’t*, 849 F.3d 615, 624 (5th Cir. 2017) (quoting *Perez v. Perry*, No. SA-11-cv-360-OLG-JES-XR, 2014 WL 106927, at *1, 2 (W.D. Tex. Jan. 8, 2014)). After all, in noting that “the Speech or Debate Clause must be read broadly,” the Supreme Court emphasized the clause could not be read to protect “all things in any way related to the legislative process.” *Brewster*, 408 U.S. at 516. Thus, read in concert with Supreme Court precedent and *Jefferson*, statements from *Harkins* and *Hughes* must mean only one

thing: the privilege continues to protect only opinions, motives, recommendations, or advice about legislative decisions. *See* First Supplemental Brief, Dkt. 709 at 2-6.

II. The Legislative Privilege Does Not Protect Fact-based Information.

Against that background, fact-based information must be disclosed. Fact-based information is not an integral part of the deliberative and communicative process and does not in and of itself reflect a legislator's opinions or motives. *See* First Supplemental Brief, Dkt. 709 at 8-13. The legislative privilege therefore does not shield this information. *See* Ex. B.

Harkins and *Hughes* did not change that principle, as discussed in Private Plaintiffs' First Supplemental Brief. *See* Dkt. 709 at 8-9. In *Hughes*, the parties "agree[d] that the documents [fell] within the privilege's scope," and the plaintiffs in that appeal argued only that the privilege "was waived" and that it "must yield." 68 F.4th at 236. Thus, in holding the documents were privileged, the *Hughes* court in no way rejected the notion that fact-based information is exempt from the privilege. Indeed, the Fifth Circuit noted that that "[t]he district court properly concluded that the documents at issue '[were] subject to legislative privilege,'" *see id.*, a conclusion the district court reached after articulating that fact-based information was *not* privileged, *La Union Del Pueblo Entero v. Abbott*, No. 5:21-cv-844-XR, 2022 WL 1667687, at *2 (W.D. Tex. May 25, 2022).⁵

Both the deliberative process and attorney-client privileges are instructive for this distinction between fact-based information and privileged thoughts, motives, or acts. First Supplemental Brief, Dkt. 709 at 10-13. Similar to the legislative privilege, the deliberative process

⁵ Similarly, after *In re Hubbard*, 803 F.3d 1298 (11th Cir. 2015)—a case cited in the discussion regarding the legislative privilege in *Harkins* and *Hughes*—some courts in the Eleventh Circuit have continued to hold that fact-based information is exempt from the legislative privilege. *See Pernell v. Lamb*, No. 4:22-cv-304-MW, 2023 WL 2347487, at *3 (N.D. Fla. Feb. 22, 2023), *appeal filed sub nom.*, *Pernell v. Andrade*, No. 23-10616 (11th Cir. Mar. 1, 2023).

privilege “is rooted in ‘the obvious realization that officials will not communicate candidly among themselves if each remark is a potential item of discovery and front page news.’” *U.S. Fish & Wildlife Serv. v. Sierra Club, Inc.*, 141 S. Ct. 777, 785 (2021) (quoting *Dep’t of Interior v. Klamath Water Users Protective Ass’n*, 532 U.S. 1, 8-9 (2001)). And for governmental officials, the attorney-client privilege is rooted in “encourag[ing] full and frank communication” and “aid[ing] government entities and employees in obtaining legal advice founded on a complete and accurate factual picture.” *United States v. Jicarilla Apache Nation*, 564 U.S. 162, 169-170 (2011). Courts have long emphasized the importance of being “free from the consequences or the apprehension of disclosure” when obtaining legal advice. *Hunt v. Blackburn*, 128 U.S. 464, 470 (1888).⁶ Thus, as with the deliberative and attorney-client privilege, fact-based information remains outside the scope of the legislative privilege. *See* Dkt. 709 at 10-13 (collecting examples of fact-based information subject to disclosure). The documents in Exhibit B therefore must be produced.

III. The Lieutenant Governor May Not Assert on the Legislative Privilege

The Lieutenant Governor may not invoke the legislative privilege because he is an *executive branch* official, and he does not have a blank check to invoke the privilege simply because, at certain times, he interacted with legislators. *See* First Supplemental Brief, Dkt. 709 at 13-18. Documents in Exhibit C must therefore be produced.

“Legislatures may not of course acquire power by an unwarranted extension of privilege,” *Tenney*, 341 U.S. at 376, “nor may [the privilege’s] limits be established by the Legislative Branch,” *Gravel*, 408 U.S. at 624 n.15. Indeed, the Supreme Court has long emphasized that it is

⁶ Counsel from the Office of the Attorney General appear to agree as much, since they recently attempted to draw an analogy between the attorney-client privilege and the legislative privilege in an appeal pending before the Fifth Circuit. *See La Union del Pueblo Entero v. Bettencourt*, No. 23-50201 (5th Cir.), Appellants’ Opening Brief, Dkt. 68 at 37 (“That is sensible because the purpose of the [attorney-client] privilege is to encourage communications between two parties. . . . So it is the same with the legislative privilege.”).

“essential” “that the persons intrusted with power in any” branch of government “shall not be permitted to encroach upon the powers confided to the others, but that each shall by the law of its creation be limited to the exercise of the powers appropriate to its own department and no other.” *Kilbourn v. Thompson*, 103 U.S. 168, 191 (1880). To that end, the legislative privilege is “invocable only by the [legislator] or by [a legislative] aide on the [legislator’s] behalf.” *Gravel*, 408 U.S. at 622. And even where the privilege may be invoked, the privilege “belongs” only “to the legislator whose legislative act is involved in the evidence[.]” 26A Charles Alan Wright & Arthur R. Miller, *Federal Practice & Procedure* § 5675 (1st ed. Apr. 2023 update). Consistent with that approach, *Hughes* speaks only of “[s]tate lawmakers” being able to “invoke [the] privilege.” 68 F.4th at 235, 237.

To the extent that *Hughes* looks to caselaw regarding legislative *immunity*, the same is generally true, although in rare exceptions, courts have concluded that non-legislators may rely on legislative immunity only to the extent they “perform legislative functions.” *Bogan*, 523 U.S. at 55. To determine whether one of those rare exceptions applies to federal executive branch officials, the Supreme Court has looked to the executive’s responsibilities under the U.S. Constitution. *Edwards v. United States*, 286 U.S. 482, 490 (1932); *Kilbourn*, 103 U.S. at 190–91; *see also League of United Latin Am. Citizens v. Abbott (“LULAC”)*, No. 3:21-cv-259-DCG-JES-JVB, 2022 WL 3233406, at *2 (W.D. Tex. Aug. 10, 2022) (Dkt. 526 at 2-3) (examining Texas Constitution and caselaw to determine that Governor performs executive—not legislative—function in calling special session). So, for example, the President performs a legislative function in signing or vetoing a bill. *Bogan*, 523 U.S. at 55 (citing *Edwards*, 286 U.S. at 490). But that does not mean, by extension, any action that the President performs relating to legislation constitutes a legislative function. That conclusion “would risk intrusion by the Executive . . . into

the sphere of protected legislative activities,” and would fail “to preserve the constitutional structure of separate, coequal and independent branches of government” served by the Speech or Debate Clause, *Helstoski*, 442 U.S. at 491.

Allowing the Lieutenant Governor to invoke the privilege would defy that precedent. The Texas Constitution specifies that the Lieutenant Governor is a member of the executive branch. Tex. Const., art. IV, § 1. Although the Texas Constitution also identifies the Lieutenant Governor as “President of the Senate,” the Texas Constitution explicitly restricts when the Lieutenant Governor may perform a legislative function, such that he may “debate and vote” only when the Senate is “in Committee of the Whole,” and may “give the casting vote” only “when the Senate is equally divided[.]” Tex. Const., art. IV, § 16(b). Beyond that, no other branch “shall exercise any power properly attached” to the legislative branch, “except in the instances . . . expressly permitted” by the Texas Constitution. Tex. Const., art. II, § 1; *see also Aleman v. Texas Med. Bd.*, 573 S.W.3d 796, 810 n.1 (Tex. 2019) (Blacklock, J., concurring) (“Article II, Section 1 of the Texas Constitution, our state’s separation-of-powers clause, has been understood to prohibit the legislature from delegating to executive branch agencies the authority to make law.”). The Lieutenant Governor does not perform—and has not performed—a legislative function, *see* Tex. Const., art. II, § 1, and thus cannot invoke the legislative privilege, *see Bogan*, 523 U.S. at 55; *see also LULAC*, 2022 WL 3233406, at *2 (Dkt. 526 at 3).

Accordingly, the Texas Constitution forecloses the ability for the Lieutenant Governor to invoke the legislative privilege *carte blanche*. Concluding otherwise would result in “an unwarranted extension of [the] privilege,” *Tenney*, 341 U.S. at 376, defying the “separation of powers” served by the privilege, *Hughes*, 68 F.4th at 237. In a similar vein, permitting a legislator to delegate the privilege to the Lieutenant Governor for tasks unrelated to his legislative function

runs afoul of the Supreme Court’s admonition that the privilege’s “limits” may not “be established by the Legislative Branch[.]” *Gravel*, 408 U.S. at 624 n.15.

In the privilege log and parties’ meet and confers, the Lieutenant Governor made no attempt to show that withheld documents in Exhibit C relate to his serving on a Committee of the Whole or casting a tie-breaking vote. *See Ex. C; see also* Dkt. 447-5. The Lieutenant Governor therefore may not invoke the legislative privilege over those documents. And because all but a handful of the documents in the possession of the Lieutenant Governor were never shared with a legislator, those documents could not have been brought into the legislative process, and thus no legislator may claim these documents as privileged.⁷ *See infra*, Section V (Waiver); *see also* First Supplemental Brief, Dkt. 709 at 13-18.

IV. The Legislative Privilege Does Not Protect Information Outside the Period of Enactment of the Challenged Legislation.

Documents created outside the period of enactment of the redistricting legislation must be disclosed. *See Ex. D; see also* First Supplemental Brief, Dkt. 709 at 7-8. The Supreme Court has repeatedly emphasized that the legislative privilege covers only “integral steps in the legislative process.” *Bogan*, 523 U.S. at 55; *see also Eastland v. U.S. Servicemen’s Fund*, 421 U.S. 491, 504 (1975); *Gravel*, 408 U.S. at 625. To determine whether evidence relates to an integral step in the legislative process—that is, whether it “fall[s] within the ‘legitimate legislative sphere’”—courts must “look to see whether the activities took place ‘in a session of the [Legislature] by one of its members in relation to the business before it.’” *Eastland*, 421 U.S. at 503–04 (citing *Kilbourn*, 103 U.S. at 204).

⁷ Consequently, disclosure of those documents could not chill or stunt the legislative process because those documents were never brought into process.

Hughes squarely aligns with this precedent, as information preceding the Census release or following enactment of the challenged redistricting plans necessarily does not reflect “actions that occurred *within* the sphere of legitimate legislative activity or *within* the regular course of the legislative process.” 68 F.4th at 235 (emphasis added) (quotations omitted). After all, a redistricting bill could not have been introduced or considered prior to the release of the Census, and a legislator’s thoughts or actions would have no effect on any legislation *after* it was sent to the Governor.

In their response to Private Plaintiffs’ First Supplemental Brief, Respondents have relied on reasoning from *Almonte v. City of Longbeach*—a case from the Second Circuit—to argue otherwise, but *Almonte* is inapposite. 478 F.3d 100 (2nd Cir. 2007). Primarily, Respondents have pointed to *Almonte*’s statement that “legislative immunity cloaks . . . discussions the [city council members] may have held, and any agreements they may have made, regarding the new budget in the months preceding the actual vote.” 478 F.3d at 107. But the Second Circuit’s analysis runs afoul of the Supreme Court’s statements that “[a] promise to deliver a speech, to vote, or to solicit other votes at some future date is not ‘speech or debate’” and that “a *promise* to introduce a bill is not a legislative act.” *Helstoski*, 442 U.S. at 490. And it ignores the Supreme Court’s emphasis that “we look to see whether the activities took place ‘in a session of the House by one of its members in relation to the business before it.’” *Eastland*, 421 U.S. at 503. Further, *Almonte* is distinguishable: unlike the budget at issue in *Almonte*, discussions of a new redistricting plan are merely theoretical before the Census releases the population data that determines where new district boundaries can and must be drawn. Moreover, *Almonte* does not address documents that *followed* the enactment of any challenged legislation. *See* 478 F.3d at 107. As such, *Almonte* does not change the rule that information outside the period of enactment must be disclosed.

Because documents outside the period of enactment cannot relate to *integral* steps in the legislative process, the documents listed in Exhibit D must be disclosed.

V. Respondents Have Waived the Privilege Over Information Shared Outside the Legislative Process.

Respondents have waived the privilege over documents in Exhibit E. *See* First Supplemental Brief, Dkt. 709 at 17-18. The Fifth Circuit emphasized that communications with third parties may be privileged only where legislators have “brought third parties *into* the process,” and that the privilege is waived when legislators “sen[t] privileged documents to third parties *outside* the legislative process.” *Hughes*, 68 F.4th at 237. And as expressed in Private Plaintiffs’ First Supplemental Brief, *Hughes* suggests that a legislator brings a third party into the process only when the legislator *solicits* the specific evidence at issue.⁸ Dkt. 709 at 17-18.

That reasoning aligns with the Supreme Court’s observation that, for example, “Members of Congress are constantly in touch with the Executive Branch of the Government and with administrative agencies—they may cajole, and exhort with respect to the administration of a federal statute—but such conduct, though generally done, is not protected legislative activity.” *Gravel*, 408 U.S. at 625. The reverse is also true. When a member of the executive branch “exhorts” or “cajoles” a legislator about redistricting, that activity likewise is not legislative and not legislatively privileged.

Because Respondents have failed to show that the documents in Exhibit E reflect instances where a legislator affirmatively brought a third party into the legislative process, the privilege has been waived for that evidence. *See* First Supplemental Brief, Dkt. 709 at 17-18.

⁸ Further, even for information a legislator solicits regarding legislation, the privilege is less strong “when applied to officers or employees of a legislative body, rather than to legislators themselves.” *Dombrowski v. Eastland*, 387 U.S. 82, 85 (1967).

VI. In This Challenge to Statewide Redistricting Plans, the Privilege—Where Applicable—Must Yield.

Even where the privilege applies, this suit presents an extraordinary circumstance where the privilege must yield because it challenges a *sui generis* process: statewide redistricting. *See* First Supplemental Brief, Dkt. 709 at 18-21. All documents in Exhibit A must be produced.

Because “[r]edistricting involves the establishment of the electoral structure by which the legislative body becomes duly constituted,” it “directly involves the self-interest of the legislators themselves.” *Marylanders for Fair Representation, Inc. v. Schaefer*, 144 F.R.D. 292, 304 (D. Md. 1992). And so, “the natural corrective mechanisms built into our republican system of government offer little check upon the very real threat of ‘legislative self-entrenchment[.]’” *Bethune-Hill v. Va. State Bd. of Elections*, 114 F. Supp. 3d 323, 337 (E.D. Va. 2015).

That is exactly when the legislative privilege must yield. Indeed, the Supreme Court has emphasized that the legislative privilege should not apply when “Congress is illequipped” to discipline or investigate itself. *Brewster*, 408 U.S. at 518. That is because “the shield” of the legislative privilege “does not extend beyond what is necessary to preserve the integrity of the legislative process.” *Id.* at 517. Indeed, the legislative privilege ultimately must serve “the rights of the people to representation in the democratic process.” *Spallone v. United States*, 493 U.S. 265, 279 (1990). Because racially discriminatory intent and effects in redistricting thwart that democratic process, the privilege must yield here.⁹ *See* Ex. A.

Other cases on which Respondents have relied—all of which are outside of this Circuit—do not counsel otherwise. *See Lee v. City of Los Angeles*, 908 F.3d 1175 (9th Cir. 2018); *In re*

⁹ As noted in Private Plaintiffs’ First Supplemental Brief, neither in *Harkins* nor *Hughes* did the Fifth Circuit reject the five-factor balancing test to determine whether the privilege should yield. Dkt. 709 at 20 n.5. Regardless of whether that test governs the Court’s analysis, the privilege should still yield.

N.D. Legislative Assembly, 70 F.4th 460 (8th Cir. 2023); *Common Cause Fla. v. Byrd*, 2023 WL 3676796 (N.D. Fla. May 25, 2023). *Lee* is distinguishable given that it involved local—not statewide—redistricting. First Supplemental Brief, Dkt. 709 at 21. And *Lee*, *In re North Dakota Legislative Assembly*, and *Common Cause Florida* all fail to acknowledge the unique nature of a redistricting lawsuit, especially given the risk of self-entrenchment and the threat to the democratic process. Thus, the reasoning in all three cases run afoul of *Brewster*, *Spallone*, and other Supreme Court precedent addressing when the privilege does not serve the public good, and contravene the law of this Circuit. Consistent with that precedent, the privilege must yield here. *See* Ex. A.

VII. Conclusion

For the foregoing reasons, Private Plaintiffs respectfully request that the Court grant their prior motions to compel, Dkts. 447 and 582, and order the production of documents listed in Exhibit A.

Dated: August 10, 2023

Respectfully submitted,

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CERTIFICATE OF SERVICE

The undersigned counsel hereby certifies that she has electronically submitted a true and correct copy of the above and foregoing via the Court's electronic filing system on the 10th day of August 2023.

/s/ Nina Perales

Nina Perales

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	Included in Private Plaintiffs' First Supplemental Brief (Dkt. 709)
DOC_0000001	Anna Mackin	PDF		11/16/2021					Legislative	Compilation of confidential emails exchanged between Ms. Mackin and various members of the Texas Legislature regarding the creation and design of the new electoral maps, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	
DOC_0000027	Anna Mackin	DOCX	Sean Opperman (attorney)	10/16/2021					Legislative; Attorney Client	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements. Includes contributions from counsel retained for the purpose of advising on the legality of the proposed legislation.	Ex. G at 143
DOC_0000064	Anna Mackin	PDF							Legislative; Attorney Client; Work Product	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements. Includes contributions from counsel retained for the purpose of advising on the legality of the proposed legislation.	Ex. G at 143
DOC_0000065	Anna Mackin	PDF							Legislative; Attorney Client; Work Product	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements. Includes contributions from counsel retained for the purpose of advising on the legality of the proposed legislation.	Ex. G at 143
DOC_0000066	Anna Mackin	PDF							Legislative; Attorney Client; Work Product	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements. Includes contributions from counsel retained for the purpose of advising on the legality of the proposed legislation.	Ex. G at 143
DOC_0000077	Anna Mackin	DOCX		8/26/2021					Legislative; Attorney Client; Work Product	Calendar entries relating to redistricting, including hearings, and meetings with legislators and staffers.	Ex. G at 164
DOC_0000078	Anna Mackin	DOCX		8/26/2021					Legislative; Attorney Client; Work Product	Calendar entries relating to redistricting, including hearings, and meetings with legislators and staffers.	Ex. G at 164
DOC_0000084	Anna Mackin	DOCX	Anna Mackin	10/16/2021					Legislative	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements. Includes contributions from counsel retained for the purpose of advising on the legality of the proposed legislation.	
DOC_0000093	Anna Mackin	PDF	Jordan Death (Senate Research Center)	9/29/2021					Legislative; Attorney Client; Work Product	Confidential Senate Research Center analysis of Senate Redistricting Committee hearing, sent to committee members, and kept in Senator Huffman's personal files for the purpose of considering redistricting legislation.	
DOC_0000094	Anna Mackin	PDF	Jo Walston (Senate Research Center)	10/1/2021					Legislative; Attorney Client; Work Product	Confidential Senate Research Center analysis of Senate Redistricting Committee hearing, sent to committee members, and kept in Senator Huffman's personal files for the purpose of considering redistricting legislation.	
DOC_0000095	Anna Mackin	PDF	Kenneth Bryan (Senate Research Center)	2/22/2021					Legislative; Attorney Client; Work Product	Confidential Senate Research Center analysis of Senate Redistricting Committee hearing, sent to committee members, and kept in Senator Huffman's personal files for the purpose of considering redistricting legislation.	
DOC_0000096	Anna Mackin	PDF	Kenneth Bryan (Senate Research Center)	3/11/2021					Legislative; Attorney Client; Work Product	Confidential Senate Research Center analysis of Senate Redistricting Committee hearing, sent to committee members, and kept in Senator Huffman's personal files for the purpose of considering redistricting legislation.	
DOC_0000097	Anna Mackin	PDF	Kenneth Bryan (Senate Research Center)	3/15/2021					Legislative; Attorney Client; Work Product	Confidential Senate Research Center analysis of Senate Redistricting Committee hearing, sent to committee members, and kept in Senator Huffman's personal files for the purpose of considering redistricting legislation.	
DOC_0000098	Anna Mackin	PDF	Andrew Robison (Senate Research Center)	3/16/2021					Legislative; Attorney Client; Work Product	Confidential Senate Research Center analysis of Senate Redistricting Committee hearing, sent to committee members, and kept in Senator Huffman's personal files for the purpose of considering redistricting legislation.	
DOC_0000101	Anna Mackin	DOCX		8/27/2021					Legislative; Attorney Client; Work Product	Confidential draft retention contract for use in connection with redistricting legislation	Ex. G at 165
DOC_0000105	Anna Mackin	DOCX	Casey Contres (Congressman Tony Gonzales former chief of staff) Sean Opperman (attorney)	10/1/2021					Legislative	Talking points for Senate Redistricting Committee hearing, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions	Ex. V at 11
DOC_0000106	Anna Mackin	PDF		9/23/2021					Legislative; Attorney Client; Work Product	Attachment to confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	Ex. G at 143
DOC_0000108	Anna Mackin	DOCX	Sean Opperman (attorney)	10/3/2021					Legislative; Attorney Client; Work Product	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	Ex. G at 143
DOC_0000117	Anna Mackin	PDF		9/12/2021					Legislative; Attorney Client; Work Product	Confidential invoice for legal services provided in connection with redistricting legislation, given to Senate Redistricting Committee Staff.	Ex. G at 165
DOC_0000118	Anna Mackin	PDF		10/7/2021					Legislative; Attorney client; work product	Confidential invoice for legal services provided in connection with redistricting legislation, given to Senate Redistricting Committee Staff.	Ex. G at 165
DOC_0000129	Anna Mackin	PDF		9/14/2021					Legislative; Attorney Client; Work Product	Confidential draft retention contract for use in connection with redistricting legislation	Ex. G at 165
DOC_0000133	Anna Mackin	PDF		10/7/2021					Legislative	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	Ex. G at 144

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	Included in Private Plaintiffs' First Supplemental Brief (Dkt. 709)
DOC_0000134	Anna Mackin	PDF		10/7/2021					Legislative	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	Ex. G at 144
DOC_0000135	Anna Mackin	PDF		10/7/2021					Legislative	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	Ex. G at 144
DOC_0000139	Anna Mackin	PDF		10/1/2021					Legislative	Confidential draft of redistricting legislation, relating to proposed districts, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	
DOC_0000140	Anna Mackin	PDF		10/1/2021					Legislative	Confidential draft of redistricting legislation, relating to proposed districts, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	
DOC_0000141	Anna Mackin	PDF		10/1/2021					Legislative	Confidential draft of redistricting legislation, relating to proposed districts, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	
DOC_0000142	Anna Mackin	PDF		10/1/2021					Legislative	Confidential draft of redistricting legislation, relating to proposed districts, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	
DOC_0000143	Anna Mackin	PDF		10/8/2021					Legislative	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	Ex. G at 144
DOC_0000144	Anna Mackin	PDF		10/8/2021					Legislative	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	Ex. G at 144
DOC_0000145	Anna Mackin	PDF		10/8/2021					Legislative	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	Ex. G at 144
DOC_0000146	Anna Mackin	PDF		10/8/2021					Legislative	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	Ex. G at 144
DOC_0000147	Anna Mackin	PDF		10/8/2021					Legislative	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	Ex. G at 144
DOC_0000175	Anna Mackin	PDF	Alelie Lila Valencia (Texas Demographic Center)	2/5/2021					Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	Ex. V at 11
DOC_0000182	Anna Mackin	PDF		9/26/2021					Legislative	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	Ex. G at 144
DOC_0000183	Anna Mackin	PDF		9/30/2021					Legislative	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	Ex. G at 144
DOC_0000184	Anna Mackin	PDF		10/4/2021					Legislative	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	Ex. G at 144
DOC_0000195	Anna Mackin	PDF		8/5/2021					Legislative	Confidential invoice for legal services provided in connection with redistricting legislation, given to Senate Redistricting Committee Staff.	Ex. G at 165
DOC_0000197	Anna Mackin	PDF		9/27/2021					Legislative	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	Ex. G at 144
DOC_0000198	Anna Mackin	PDF		9/27/2021					Legislative	Confidential draft of redistricting legislation, relating to proposed districts, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	
DOC_0000199	Anna Mackin	DOCX	Sean Opperman (attorney)	10/16/2021					Legislative; attorney client	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	Ex. G at 145
DOC_0000210	Anna Mackin	DOCX		8/30/2021					Legislative	Calendar entries relating to redistricting, including hearings, and meetings with legislators and staffers.	Ex. G at 164
DOC_0000213	Anna Mackin	PDF		4/13/2021					Legislative; Attorney Client; Work Product	Confidential retention letter from Lebotsky Keller to Lieutenant Governor Patrick and Senator Huffman, setting forth scope of representation and describing related redistricting legal issues, made for the purpose of facilitating the rendition of legal advice regarding redistricting litigation. The retention of Lebotsky Kelly and the firm's scope of work also reveals mental impressions on legislative process and policy.	Ex. G at 165
DOC_0000217	Anna Mackin	PDF		9/8/2021					Legislative; Attorney Client; Work Product	Confidential draft retention contract for use in connection with redistricting legislation	Ex. G at 165
DOC_0000218	Anna Mackin	PDF		9/8/2021					Legislative	Confidential draft retention contract for use in connection with redistricting legislation	Ex. G at 165
DOC_0000219	Anna Mackin	PDF		9/13/2021					Legislative	Confidential draft retention contract for use in connection with redistricting legislation	Ex. G at 165
DOC_0000220	Anna Mackin	DOCX		8/31/2021					Legislative	Confidential draft retention contract for use in connection with redistricting legislation	Ex. G at 165
DOC_0000267	Anna Mackin	DOCX	Anna Mackin (attorney)	10/17/2021					Legislative; Attorney Client; Work Product	Summary of proposed redistricting legislation relating to proposed districts, prepared by Anna Mackin (attorney) for Senator Huffman's use in considering redistricting legislation, reflecting and implicating legislative and attorney privileged thoughts, opinions, and mental impressions.	

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	Included in Private Plaintiffs' First Supplemental Brief (Dkt. 709)
DOC_0000269	Anna Mackin	DOCX	Anna Mackin (attorney)	10/5/2021					Legislative; Attorney Client; Work Product	Talking points for Senate Redistricting Committee hearing, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions	
DOC_0000270	Anna Mackin	DOCX	Anna Mackin (attorney)	10/7/2021					Legislative; Attorney Client; Work Product	Summary of proposed redistricting legislation relating to proposed districts, prepared by Anna Mackin (attorney) for Senator Huffman's use in considering redistricting legislation, reflecting and implicating legislative and attorney privileged thoughts, opinions, and mental impressions.	
DOC_0000271	Anna Mackin	DOCX	Sean Opperman (attorney)	10/5/2021					Legislative; Attorney Client; Work Product	Talking points for Senate Redistricting Committee hearing, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions	
DOC_0000273	Anna Mackin	DOCX	Anna Mackin (attorney)	10/16/2021					Legislative; Attorney Client; Work Product	Summary of proposed redistricting legislation relating to proposed districts, prepared by Anna Mackin (attorney) for Senator Huffman's use in considering redistricting legislation, reflecting and implicating legislative and attorney privileged thoughts, opinions, and mental impressions.	
DOC_0000274	Anna Mackin	DOCX	Anna Mackin (attorney)	10/12/2021					Legislative	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	Ex. G at 145
DOC_0000277	Anna Mackin	DOCX	Anna Mackin (attorney)	9/30/2021					Legislative	Typed notes regarding redistricting legislation relating to proposed districts, kept for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	
DOC_0000280	Anna Mackin	DOCX	Anna Mackin (attorney)	10/17/2021					Legislative; Attorney Client	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements	Ex. G at 145
DOC_0000293	Anna Mackin	DOCX	Anna Mackin (attorney)	9/29/2021					Legislative; Attorney Client; Work Product	Talking points for Senate Redistricting Committee hearing, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions	
DOC_0000305	Anna Mackin	DOCX	Anna Mackin (attorney)	9/29/2021					Legislative; Attorney Client; Work Product	Talking points for Senate Redistricting Committee hearing, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions	
DOC_0000306	Anna Mackin	DOCX	Anna Mackin (attorney)	9/24/2021					Legislative; Attorney Client; Work Product	Talking points for Senate Redistricting Committee hearing, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions	
DOC_0000344	Anna Mackin	DOCX	Wroe Jackson (Senator Huffman general counsel)	7/16/2021					Legislative; Attorney Client; Work Product	Draft schedule for the redistricting process, prepared for Senator Huffman by Anna Mackin (attorney), reflecting and implicating legislative privileged thoughts, opinions, and mental impressions, as well as attorney advice and mental impressions.	Ex. V at 11
DOC_0000345	Anna Mackin	DOCX	Wroe Jackson (Senator Huffman general counsel)	7/19/2021					Legislative; Attorney Client; Work Product	Draft schedule for the redistricting process, prepared for Senator Huffman by Anna Mackin (attorney), reflecting and implicating legislative privileged thoughts, opinions, and mental impressions, as well as attorney advice and mental impressions.	Ex. V at 11
DOC_0000346	Anna Mackin	DOCX	Wroe Jackson (Senator Huffman general counsel)	7/21/2021					Legislative; Attorney Client; Work Product	Draft schedule for the redistricting process, prepared for Senator Huffman by Anna Mackin (attorney), reflecting and implicating legislative privileged thoughts, opinions, and mental impressions, as well as attorney advice and mental impressions.	Ex. V at 11
DOC_0000349	Anna Mackin	DOCX	Wroe Jackson (Senator Huffman general counsel)	5/7/2021					Legislative; Attorney Client; Work Product	Draft schedule for the redistricting process, prepared for Senator Huffman by Anna Mackin (attorney), reflecting and implicating legislative privileged thoughts, opinions, and mental impressions, as well as attorney advice and mental impressions.	Ex. V at 11
DOC_0000350	Anna Mackin	DOCX	Wroe Jackson (Senator Huffman general counsel)	7/16/2021					Legislative; Attorney Client; Work Product	Draft schedule for the redistricting process, prepared for Senator Huffman by Anna Mackin (attorney), reflecting and implicating legislative privileged thoughts, opinions, and mental impressions, as well as attorney advice and mental impressions.	Ex. V at 11
DOC_0000351	Anna Mackin	DOCX	Sean Opperman (attorney)	8/26/2021					Legislative; Attorney Client; Work Product	Draft schedule for the redistricting process, prepared for Senator Huffman by Anna Mackin (attorney), reflecting and implicating legislative privileged thoughts, opinions, and mental impressions, as well as attorney advice and mental impressions.	
DOC_0000353	Anna Mackin	DOCX	Anna Mackin (attorney)	1/29/2021					Legislative; Attorney client; work product	Draft schedule for the redistricting process, prepared for Senator Huffman by Anna Mackin (attorney), reflecting and implicating legislative privileged thoughts, opinions, and mental impressions, as well as attorney advice and mental impressions.	
DOC_0000372	Anna Mackin	MSG		1/9/2021	Sean Opperman (attorney)	Jeff Archer (TLC)	Anna Mackin (attorney); Karina Davis		Legislative; Attorney client; work product	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	
DOC_0000974	Anna Mackin	DOCX	Sean Opperman (attorney)	1/17/2021					Legislative; Attorney Client; Work Product	Attachment to confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	
DOC_0000975	Anna Mackin	MSG		1/17/2021	Anna Mackin (attorney)	Sean Opperman (attorney)			Legislative; Attorney Client; Work Product	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	
DOC_0001064	Anna Mackin	MSG		9/11/2021	Anna Mackin (attorney)	Jared May (TLC)			Legislative; Attorney Client; Work Product	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	
DOC_0001080	Anna Mackin	MSG		10/16/2021	Anna Mackin (attorney)	Sean Opperman (attorney)			Legislative; Attorney client; work product	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	Ex. G at 145
DOC_0001173	Anna Mackin	MSG		4/13/2021	Scott Keller (attorney)	Darrel Davila	Chris Steiner (attorney); Alix Morris (Attorney); Sean Opperman (attorney); Anna Mackin (attorney); Todd Disher		Legislative; Attorney Client; Work Product	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	Ex. V at 11

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	Included in Private Plaintiffs' First Supplemental Brief (Dkt. 709)
DOC_0001204	Anna Mackin	MSG		3/27/2021	Aaron Harris; Alexander Hammond; Angus Lupton; Anna Barnett; Anna Mackin (attorney); Britton Davis; Caitly Jackson; Carrie Smith; Cody Terry; Deisy Jaimes; Doug Clements; Drew Tedford; Grecia Galvan; Jason Kirksey; Kenneth Bryan; Koy Kunkel; Lara Wendler; Lauren Cacheaux; Luis Moreno; Marc Salvato; Mathew Dowling; Paul Emerson; Pearl Cruz; Randy Samuelson; Ruben O'Bell; Rudy England; Ryan Alter; Shelby Corine; Stacey Chamberlin; sushma Smith; Tomas Larralde; Tony Wen	Sean Opperman (Attorney)			Legislative; Attorney Client Work Product	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	
DOC_0001244	Anna Mackin	MSG		7/29/2021	Aaron Harris; Alexander Hammond; Angus Lupton; Anna Barnett; Anna Mackin (attorney); Britton Davis; Caitly Jackson; Carrie Smith; Cody Terry; Deisy Jaimes; Doug Clements; Drew Tedford; Grecia Galvan; Jason Kirksey; Kenneth Bryan; Koy Kunkel; Lara Wendler; Lauren Cacheaux; Luis Moreno; Marc Salvato; Mathew Dowling; Paul Emerson; Pearl Cruz; Randy Samuelson; Ruben O'Bell; Rudy England; Ryan Alter; Shelby Corine; Stacey Chamberlin; sushma Smith; Tomas Larralde; Tony Wen	Sean Opperman (Attorney)			Legislative; Attorney Client; Work Product	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	
DOC_0001268	Anna Mackin	MSG		8/27/2021	Gardner Pate; Jeff Oldham (attorney); Courtney Hjaltnan; Angela Colmenero	Sean Opperman (attorney)	Anna Mackin (attorney)		Legislation	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	Ex. G at 147; Ex. V at 11
DOC_0001269	Anna Mackin	DOCX		8/26/2021					Legislation	Calendar entries relating to redistricting, including hearings, and meetings with legislators and staffers.	Ex. G at 164
DOC_0001270	Anna Mackin	DOCX		8/26/2021					Legislation	Calendar entries relating to redistricting, including hearings, and meetings with legislators and staffers.	Ex. G at 164
DOC_0001271	Anna Mackin	MSG		8/30/2021	Gardner Pate; Jeff Oldham (attorney); Courtney Hjaltnan; Angela Colmenero (attorney).	Sean Opperman (attorney)	Anna Mackin		Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	Ex. G at 147; Ex. V at 11
DOC_0001272	Anna Mackin	DOCX		8/30/2021					Legislative	Calendar entries relating to redistricting, including hearings, and meetings with legislators and staffers.	Ex. G at 164
DOC_0001283	Anna Mackin	MSG		9/8/2021	Anna Mackin (attorney)	Brad Lockerbie (consultant)			Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	Ex. G at 148; Ex. V at 11
DOC_0001284	Anna Mackin	PDF		9/8/2021					Legislative	Confidential draft retention contract for use in connection with redistricting legislation	Ex. G at 165
DOC_0001285	Anna Mackin	MSG		9/8/2021	Anna Mackin (attorney)	Brad Lockerbie (consultant)			Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	Ex. G at 148; Ex. V at 12
DOC_0001286	Anna Mackin	PDF		9/8/2021					Legislative	Confidential draft retention contract for use in connection with redistricting legislation	Ex. G at 165
DOC_0001326	Anna Mackin	MSG		9/19/2021	Anna Mackin (attorney); Sean Opperman (attorney)	Wendy Underhill	Ben Williams		Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	Ex. G at 150; Ex. V at 12
DOC_0001358	Anna Mackin	PDF		9/26/2021					Legislative	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	Ex. G at 152
DOC_0001431	Anna Mackin	MSG		9/30/2021	Sean Opperman (attorney)	Jared May (TLC)			Legislative Attorney client; work product	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	Ex. G at 157
DOC_0001432	Anna Mackin	PDF							Legislative; Attorney Client; Work Product	Analysis on draft redistricting legislation relating to proposed district, with related data. Includes contributions and advice from counsel on the legality of the proposed legislation. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions legislative process and judgements, includes contributions and advice from counsel on the legality of the proposed district.	Ex. G at 157
DOC_0001433	Anna Mackin	PDF		9/30/2021					Legislative; Attorney Client; Work Product	Analysis on draft redistricting legislation relating to proposed district, with related data. Includes contributions and advice from counsel on the legality of the proposed legislation. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions legislative process and judgements, includes contributions and advice from counsel on the legality of the proposed district.	Ex. G at 157
DOC_0001434	Anna Mackin	MSG		10/1/2021	Jared May (TLC); Anna Mackin (attorney)	Sean Opperman (attorney)			Legislative; Attorney Client; Work Product	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	Ex. G at 157
DOC_0001455	Anna Mackin	MSG		10/1/2021	Anna Mackin (attorney)	Sean Opperman (attorney)			Legislative; Attorney Client; Work Product	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	Ex. G at 158
DOC_0001456	Anna Mackin	PDF		10/1/2021					Legislative; Attorney Client; Work Product	Attachment to confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	Ex. G at 158
DOC_0001457	Anna Mackin	PDF		10/1/2021					Legislative Attorney client; work product	Attachment to confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	Ex. G at 158
DOC_0001458	Anna Mackin	PDF		10/1/2021					Legislative; Attorney Client; Work Product	Attachment to confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	Ex. G at 158

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	Included in Private Plaintiffs' First Supplemental Brief (Dkt. 709)
DOC_0001459	Anna Mackin	PDF		10/1/2021					Legislative; attorney client; work Product	Attachment to confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	Ex. G at 158
DOC_0001473	Anna Mackin	MSG		10/3/2021	Anna Mackin (attorney)	Christopher Hilton (attorney)			Legislative; Attorney client; work product	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	Ex. G at 158
DOC_0001474	Anna Mackin	DOCX	Sean Opperman (attorney)	10/3/2021					Attorney Client; Work product.	Attachment to confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	Ex. G at 158
DOC_0001508	Anna Mackin	MSG		10/4/2021	Sean Opperman (attorney); Anna Mackin (attorney)	Jared May (TLC)			Legislative; attorney client; work Product	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	Ex. G at 158
DOC_0001509	Anna Mackin	MSG		10/4/2021	jared May (TLC); Anna Mackin (attorney).	Sean Opperman (attorney)			Legislative attorney client; work product	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	Ex. G at 158
DOC_0001511	Anna Mackin	MSG		10/4/2021	Sean Opperman (attorney); Anna Mackin (attorney)	jared May (TLC)			Legislative; Attorney Client; Work Product	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	Ex. G at 158
DOC_0001512	Anna Mackin	PDF							Legislative; Attorney Client; Work Product	Analysis on draft redistricting legislation relating to proposed district, with related data. Includes contributions and advice from counsel on the legality of the proposed legislation. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions legislative process and judgements. includes contributions and advice from counsel on the legality of the proposed district.	Ex. G at 159
DOC_0001513	Anna Mackin	PDF		10/4/2021					Legislative; Attorney Client; Work Product	Analysis of draft redistricting legislation relating to proposed districts, with related data. Includes contributions and advice from counsel on the legality of the proposed legislation. Prepared for senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgement. Includes contributions and advice from counsel on the legality of the proposed districts.	Ex. G at 159
DOC_0001514	Anna Mackin	MSG		10/8/2021	Jared May (TLC); Anna Mackin (attorney)	Sean Opperman (attorney)			Legislative attorney client; work product	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	Ex. G at 159
DOC_0001516	Anna Mackin	PDF		8/12/2021					Legislative	Confidential invoice for legal services provided in connection with redistricting legislation, given to Senate Redistricting Committee Staff.	Ex. G at 165
DOC_0001517	Anna Mackin	PDF		8/5/2021					Legislative	Confidential invoice for legal services provided in connection with redistricting legislation, given to Senate Redistricting Committee Staff.	Ex. G at 165
DOC_0001519	Anna Mackin	PDF		10/7/2021					Legislative	Confidential invoice for legal services provided in connection with redistricting legislation, given to Senate Redistricting Committee Staff.	Ex. G at 165
DOC_0001521	Anna Mackin	PDF		10/7/2021					Legislative	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for senator huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	Ex. G at 159
DOC_0001522	Anna Mackin	PDF		10/7/2021					Legislative	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	Ex. G at 159
DOC_0001523	Anna Mackin	PDF		10/7/2021					Legislative	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for senator huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	Ex. G at 159
DOC_0001538	Anna Mackin	MSG		10/8/2021	Sean Opperman (attorney); Anna Mackin (attorney)	Jared May (TLC)			Legislative; Attorney Client; Work Product	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	Ex. G at 159
DOC_0001539	Anna Mackin	MSG		10/8/2021	Sean Opperman (attorney); Anna Mackin (attorney)	Jared May (TLC)			Legislative attorney client; work product	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	Ex. G at 160
DOC_0001560	Anna Mackin	DOCX	Sean Opperman (attorney)	10/16/2021					Legislative; Attorney Client	Analysis on draft redistricting legislation relating to proposed districts, with related data. Includes contributions and advice from counsel on the legality of the proposed legislation. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements. Includes contributions and advice from counsel on the legality of the proposed maps.	Ex. G at 162
DOC_0001562	Anna Mackin	DOCX	Sean Opperman (attorney)	10/16/2021					Legislative; Attorney Client	Analysis on draft redistricting legislation relating to proposed districts, with related data. Includes contributions and advice from counsel on the legality of the proposed legislation. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements. Includes contributions and advice from counsel on the legality of the proposed maps.	Ex. G at 162
DOC_0001563	Anna Mackin	MSG		10/17/2021	Anna Mackin (attorney); Sean Opperman (attorney)	Jared My (TLC)			Legislative; Attorney Client; Work Product	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	Ex. G at 163
DOC_0001972	Senator Joan Huffman	PDF		8/22/2021					Legislative	Data relating to draft redistricting legislation for congressional districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 9
DOC_0001974	Senator Joan Huffman	PDF		8/19/2021					Legislative	Data relating to draft redistricting legislation for congressional districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 9
DOC_0001975	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	9/20/2021					Legislative; Attorney Client; Work Product	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts, including input from attorneys relating to proposed redistricting legislation.	Ex. G at 10

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	Included in Private Plaintiffs' First Supplemental Brief (Dkt. 709)
DOC_0001976	Senator Joan Huffman	DOCX	Anna Mackin (attorney)	10/7/2021					Legislative	Confidential draft talking points for committee or Senate floor regarding draft redistricting legislation, including input from attorneys relating to proposed redistricting legislation.	Ex. G at 10
DOC_0001977	Senator Joan Huffman	DOCX	Anna Mackin (attorney)	10/14/2021					Legislative; Attorney Client; Work Product	Confidential draft talking points for committee or Senate floor regarding draft redistricting legislation, including input from attorneys relating to proposed redistricting legislation.	Ex. G at 10
DOC_0001978	Senator Joan Huffman	DOCX	Anna Mackin (attorney)	10/7/2021					Legislative; Attorney Client; Work Product	Confidential draft talking points for committee or Senate floor regarding draft redistricting legislation, including input from attorneys relating to proposed redistricting legislation.	Ex. G at 10
DOC_0001979	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	10/3/2021					Legislative; Attorney Client; Work Product	Confidential draft talking points for committee or Senate floor regarding draft redistricting legislation, including input from attorneys relating to proposed redistricting legislation.	Ex. G at 10
DOC_0001980	Senator Joan Huffman	PDF		10/8/2021					Legislative	Data relating to draft redistricting legislation for congressional districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 10
DOC_0001981	Senator Joan Huffman	PDF		9/27/2021					Legislative	Data relating to draft redistricting legislation for congressional districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 10
DOC_0001982	Senator Joan Huffman	PDF	State of Texas	9/29/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	Ex. G at 10; Ex. V at 2
DOC_0001983	Senator Joan Huffman	DOCX	SO	9/27/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	Ex. G at 10; Ex. V at 2
DOC_0001986	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	10/17/2021					Legislative; Attorney Client; Work Product	Confidential bill draft and related materials, regarding draft redistricting legislation, including input from attorneys relating to proposed redistricting legislation.	Ex. G at 10
DOC_0001987	Senator Joan Huffman	DOCX	Allison Schmitz	10/16/2021					Legislative; Attorney Client; Work Product	Confidential bill draft and related materials, regarding draft redistricting legislation, including input from attorneys relating to proposed redistricting legislation.	Ex. G at 10; Ex. V at 2
DOC_0001988	Senator Joan Huffman	DOCX	Allison Schmitz	10/16/2021					Legislative; Attorney Client; Work Product	Confidential bill draft and related materials, regarding draft redistricting legislation, including input from attorneys relating to proposed redistricting legislation.	Ex. G at 10; Ex. V at 2
DOC_0001989	Senator Joan Huffman	DOCX	Zachary Stephenson	10/16/2021					Legislative; Attorney Client; Work Product	Confidential bill draft and related materials, regarding draft redistricting legislation, including input from attorneys relating to proposed redistricting legislation.	Ex. G at 10; Ex. V at 2
DOC_0001990	Senator Joan Huffman	PDF		9/28/2021					Legislative	Data relating to draft redistricting legislation for congressional districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 10
DOC_0001991	Senator Joan Huffman	DOCX	Anna Mackin	10/3/2021					Legislative	Confidential analysis of proposed amendments relating to the legislative redistricting process.	Ex. G at 10
DOC_0001993	Senator Joan Huffman	DOCX	Anna Mackin (attorney)	9/29/2021					Legislative; Attorney Client; Work Product	Confidential draft talking points for committee or Senate floor regarding draft redistricting legislation, including input from attorneys relating to proposed redistricting legislation.	Ex. G at 10
DOC_0001994	Senator Joan Huffman	DOCX	Sarah Willcox	10/12/2021					Legislative; Attorney Client; Work Product	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, including input from attorneys relating to proposed redistricting legislation.	Ex. G at 10; Ex. V at 2
DOC_0001995	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	10/12/2021					Legislative; Attorney Client; Work Product	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, including input from attorneys relating to proposed redistricting legislation.	Ex. G at 11
DOC_0001996	Senator Joan Huffman	DOCX	Sarah Willcox	10/3/2021					Legislative; Attorney Client; Work Product	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, including input from attorneys relating to proposed redistricting legislation.	Ex. G at 11; Ex. V at 2
DOC_0001997	Senator Joan Huffman	DOCX	Sarah Willcox	10/1/2021					Legislative; Attorney Client; Work Product	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, including input from attorneys relating to proposed redistricting legislation.	Ex. G at 11; Ex. V at 2
DOC_0001999	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	10/1/2021					Legislative; Attorney Client; Work Product	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, including input from attorneys relating to proposed redistricting legislation.	Ex. G at 11
DOC_0002001	Senator Joan Huffman	DOCX	Sarah Willcox	9/21/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	Ex. G at 11; Ex. V at 2
DOC_0002002	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	9/22/2021					Legislative; Attorney Client; Work Product	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, including input from attorneys relating to proposed redistricting legislation.	Ex. G at 11
DOC_0002004	Senator Joan Huffman	DOCX	Sarah Willcox	9/21/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	Ex. G at 11
DOC_0002005	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	9/24/2021					Legislative; Attorney Client; Work Product	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, including input from attorneys relating to proposed redistricting legislation.	Ex. G at 11
DOC_0002006	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	9/27/2021					Legislative; Attorney Client; Work Product	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, including input from attorneys relating to proposed redistricting legislation.	Ex. G at 11
DOC_0002007	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	9/28/2021					Legislative; Attorney Client; Work Product	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, including input from attorneys relating to proposed redistricting legislation.	Ex. G at 11
DOC_0002008	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	9/27/2021					Legislative; Attorney Client; Work Product	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, including input from attorneys relating to proposed redistricting legislation.	Ex. G at 11
DOC_0002011	Senator Joan Huffman	DOCX	Sarah Willcox	9/29/2021					Legislative; Attorney Client; Work Product	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, including input from attorneys relating to proposed redistricting legislation.	Ex. G at 11
DOC_0002012	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	9/29/2021					Legislative; Attorney Client; Work Product	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, including input from attorneys relating to proposed redistricting legislation.	Ex. G at 11
DOC_0002023	Senator Joan Huffman	DOCX	Anna Mackin (attorney)	10/12/2021					Legislative; Attorney Client; Work Product	Confidential bill draft and related materials, regarding draft redistricting legislation, including input from attorneys relating to proposed redistricting legislation.	Ex. G at 12
DOC_0002140	Senator Joan Huffman	DOCX	Anna Mackin (attorney)	10/16/2021					Legislative	Data relating to draft redistricting legislation for congressional districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 15

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	Included in Private Plaintiffs' First Supplemental Brief (Dkt. 709)
DOC_0002558	Senator Joan Huffman	XLSX	Sean opperman (attorney)	3/29/2019					Legislative; Attorney Clint	Confidential invoice relating to expert services, sought for the purpose of providing expert consultation to aid in drafting and considering redistricting legislation.	Ex. G at 49
DOC_0002559	Senator Joan Huffman	PDF		4/13/2021					Legislative; Attorney Client; Work Product	Confidential contract for the retention of outside legal counsel, sought for the purpose of receiving legal advice in connection with redistricting legislation.	Ex. G at 49
DOC_0002560	Senator Joan Huffman	PDF		4/13/2021					Legislative; Attorney Client; Work Product	Confidential contract for the retention of outside legal counsel, sought for the purpose of receiving legal advice in connection with redistricting legislation.	Ex. G at 49
DOC_0002562	Senator Joan Huffman	PDF		7/22/2021					Legislative; Attorney Client; Work Product	Confidential invoice relating to outside legal counsel, sought for the purpose of receiving legal advice in connection with redistricting legislation.	Ex. G at 49
DOC_0002563	Senator Joan Huffman	PDF		8/12/2021					Legislative; Attorney Client; Work Product	Confidential invoice relating to outside legal counsel, sought for the purpose of receiving legal advice in connection with redistricting legislation.	Ex. G at 49
DOC_0002564	Senator Joan Huffman	PDF		10/7/2021					Legislative; Attorney Client; Work Product	Confidential invoice relating to outside legal counsel, sought for the purpose of receiving legal advice in connection with redistricting legislation.	Ex. G at 49
DOC_0002565	Senator Joan Huffman	PDF		8/5/2021					Legislative; Attorney Client; Work Product	Confidential invoice relating to outside legal counsel, sought for the purpose of receiving legal advice in connection with redistricting legislation.	Ex. G at 49
DOC_0002566	Senator Joan Huffman	PDF		6/8/2021					Legislative; Attorney Client; Work Product	Confidential invoice relating to outside legal counsel, sought for the purpose of receiving legal advice in connection with redistricting legislation.	Ex. G at 49
DOC_0002567	Senator Joan Huffman	PDF		8/12/2021					Legislative; Attorney Client; Work Product	Confidential invoice relating to outside legal counsel, sought for the purpose of receiving legal advice in connection with redistricting legislation.	Ex. G at 49
DOC_0002568	Senator Joan Huffman	PDF		8/5/2021					Legislative; Attorney Client; Work Product	Confidential invoice relating to outside legal counsel, sought for the purpose of receiving legal advice in connection with redistricting legislation.	Ex. G at 49
DOC_0002577	Senator Joan Huffman	PDF	JSA	3/26/2021					Legislative; Attorney Client; Work Product	Confidential memorandum from Texas Legislative Council to members of the legislature relating to redistricting materials.	Ex. G at 19; Ex. V at 3
DOC_0002578	Senator Joan Huffman	PDF	JSA	3/26/2021					Legislative; Attorney Client; Work Product	Confidential memorandum from Texas Legislative Council to members of the legislature relating to redistricting materials.	Ex. G at 19; Ex. V at 3
DOC_0002692	Senator Joan Huffman	PDF		10/3/2019					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 21
DOC_0002693	Senator Joan Huffman	PDF		9/30/2019					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 21
DOC_0002694	Senator Joan Huffman	PDF		10/2/2019					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 21
DOC_0002695	Senator Joan Huffman	PDF		10/1/2019					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 21
DOC_0002700	Senator Joan Huffman	XLSX	KAG	2/20/2015					Legislative	Data relating to draft redistricting legislation for state board of education districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 21; Ex. V at 3
DOC_0006820	Senator Joan Huffman	XLSX	Jared May	8/15/2021					Legislative	Data relating to draft redistricting legislation for state board of education districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 23
DOC_0006821	Senator Joan Huffman	XLSX	Michael Hankins	8/13/2021					Legislative	Data relating to draft redistricting legislation for state board of education districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 23; Ex. V at 5
DOC_0006822	Senator Joan Huffman	PDF		8/16/2021					Legislative	Data relating to draft redistricting legislation for state board of education districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 23
DOC_0006823	Senator Joan Huffman	PDF		8/23/2021					Legislative	Data relating to draft redistricting legislation for state board of education districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 23
DOC_0006825	Senator Joan Huffman	PDF		8/20/2021					Legislative	Data relating to draft redistricting legislation for state board of education districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 23
DOC_0006826	Senator Joan Huffman	PDF		10/19/2021					Legislative	Data relating to draft redistricting legislation for state board of education districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 23
DOC_0006828	Senator Joan Huffman	PDF		10/21/2021					Legislative	Data relating to draft redistricting legislation for state board of education districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 23
DOC_0006849	Senator Joan Huffman	PDF		10/1/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation for congressional districts.	Ex. G at 23
DOC_0006850	Senator Joan Huffman	PDF		10/1/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation for congressional districts.	Ex. G at 23
DOC_0006851	Senator Joan Huffman	PDF		10/1/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation for congressional districts.	Ex. G at 23
DOC_0006852	Senator Joan Huffman	PDF		10/1/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation for congressional districts.	Ex. G at 23
DOC_0006853	Senator Joan Huffman	PDF		10/5/2021	Senator Joan Huffman; Representative Todd Hunter	Congresswoman Sheila Jackson Lee; Congressman Al Green	Members of the Texas Senate and Texas House		Legislative	Confidential communication from Congresswoman Sheila Jackson Lee and Congressman Al Green to Senator Joan Huffman and Representative Todd Hunter, regarding draft redistricting legislation for congressional districts.	Ex. G at 23; Ex. V at 5
DOC_0006868	Senator Joan Huffman	PDF	State of Texas	10/4/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	Ex. G at 24; Ex. V at 5
DOC_0006869	Senator Joan Huffman	PDF		10/4/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	Ex. G at 24
DOC_0006870	Senator Joan Huffman	PDF		10/4/2021					Legislative	Data relating to draft redistricting legislation for congressional districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 24
DOC_0006871	Senator Joan Huffman	PDF		10/4/2021					Legislative	Data relating to draft redistricting legislation for congressional districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 24

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	Included in Private Plaintiffs' First Supplemental Brief (Dkt. 709)
	Lieutenant Governor Dan Patrick									Document on strategy for news and social media and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	
DOC_0012163	Lieutenant Governor Dan Patrick	PDF		5/26/2017					Legislative	Confidential retention letter from outside attorneys to Lieutenant Governor Patrick for services in connection with considering redistricting legislation.	Ex. C at 87; Ex. G at 47; Ex. Q at 87
DOC_0012239	Lieutenant Governor Dan Patrick	PDF		4/13/2021					Legislative; Attorney Client; Work Product	Confidential retention letter from outside attorneys to Lieutenant Governor Patrick for services in connection with considering redistricting legislation.	Ex. C at 87; Ex. G at 47; Ex. Q at 87
DOC_0012240	Lieutenant Governor Dan Patrick	DOCX	Scott Keller (attorney)	3/26/2021					Legislative; Attorney Client; Work Product	Confidential retention letter from outside attorneys to Lieutenant Governor Patrick for services in connection with considering redistricting legislation.	Ex. C at 87; Ex. G at 47; Ex. Q at 87
DOC_0012241	Lieutenant Governor Dan Patrick	DOCX	Scott Keller (attorney)	3/26/2021					Legislative; Attorney Client; Work Product	Confidential retention letter from outside attorneys to Lieutenant Governor Patrick for services in connection with considering redistricting legislation.	Ex. C at 87; Ex. G at 47; Ex. Q at 87
DOC_0012244	Lieutenant Governor Dan Patrick	DOCX	Steven Aranyi	10/8/2021					Legislative	Confidential retention letter from outside attorneys to Lieutenant Governor Patrick for services in connection with considering redistricting legislation.	Ex. C at 87; Ex. G at 47; Ex. Q at 87
DOC_0012277	Lieutenant Governor Dan Patrick	PDF	James Whitehome	4/1/2021					Legislative	Attachment to confidential communication between Lieutenant Governor Patrick staffers regarding redistricting data, made for a legislative purpose and reflecting privileged information, including thoughts, opinions, and mental impressions.	Ex. C at 88; Ex. Q at 88; Ex. V at 2
DOC_0012398	Lieutenant Governor Dan Patrick	MSG		10/11/2021	Jeff Archer (TLC Executive Director)	Darrell Davila (Lt. Gov. Chief of Staff)	Sean Opperman (attorney); Anna Mackin (attorney); Chris Sterner (attorney); Alex Morris (attorney)		Legislative	Confidential communication between Lieutenant Governor Patrick staff and TLC regarding invoice for legal services provided in connection with redistricting litigation.	Ex. C at 88; Ex. Q at 88; Ex. G at 47
DOC_0012399	Lieutenant Governor Dan Patrick	PDF		10/7/2021					Legislative	Attached invoice to confidential communication between Lieutenant Governor Patrick staff and TLC regarding invoice for legal services provided in connection with redistricting litigation.	Ex. C at 88; Ex. G at 47; Ex. Q at 88
DOC_0012419	Lieutenant Governor Dan Patrick	MSG		3/11/2021	Chris Sterner (attorney) (Lt. Gov. General Counsel)	Jeff Archer (TLC Executive Director)			Legislative	Attached invoice to confidential communication between Lieutenant Governor Patrick staff and TLC regarding invoice for legal services provided in connection with redistricting litigation.	Ex. C at 88; Ex. G at 47; Ex. Q at 88
DOC_0012420	Lieutenant Governor Dan Patrick	DOCX	ATC	3/11/2021					Legislative	Attached invoice to confidential communication between Lieutenant Governor Patrick staff and TLC regarding invoice for legal services provided in connection with redistricting litigation.	Ex. C at 88; Ex. G at 47; Ex. Q at 88
DOC_0012507	Lieutenant Governor Dan Patrick	PNG			Darrell Davila (Lt. Gov. Chief of Staff)	Scott Keller (attorney)			Attorney Client; Work Product	Confidential communication between Darrell Davila and attorney, made for the purpose of facilitating the rendition of legal advice in connection with redistricting legislation.	
DOC_0012508	Lieutenant Governor Dan Patrick	PNG			Darrell Davila (Lt. Gov. Chief of Staff)	Scott Keller (attorney)			Attorney Client; Work Product	Confidential communication between Darrell Davila and attorney, made for the purpose of facilitating the rendition of legal advice in connection with redistricting legislation.	
DOC_0012509	Lieutenant Governor Dan Patrick	PNG			Darrell Davila (Lt. Gov. Chief of Staff)	Scott Keller (attorney)			Attorney Client; Work Product	Confidential communication between Darrell Davila and attorney, made for the purpose of facilitating the rendition of legal advice in connection with redistricting legislation.	
DOC_0012510	Lieutenant Governor Dan Patrick	PNG			Darrell Davila (Lt. Gov. Chief of Staff)	Scott Keller (attorney)			Attorney Client; Work Product	Confidential communication between Darrell Davila and attorney, made for the purpose of facilitating the rendition of legal advice in connection with redistricting legislation.	
DOC_0012511	Lieutenant Governor Dan Patrick	PNG			Darrell Davila (Lt. Gov. Chief of Staff)	Scott Keller (attorney)			Attorney Client; Work Product	Confidential communication between Darrell Davila and attorney, made for the purpose of facilitating the rendition of legal advice in connection with redistricting legislation.	
DOC_0012512	Lieutenant Governor Dan Patrick	PNG			Darrell Davila (Lt. Gov. Chief of Staff)	Scott Keller (attorney)			Attorney Client; Work Product	Confidential communication between Darrell Davila and attorney, made for the purpose of facilitating the rendition of legal advice in connection with redistricting legislation.	
DOC_0012513	Lieutenant Governor Dan Patrick	PNG			Darrell Davila (Lt. Gov. Chief of Staff)	Scott Keller (attorney)			Attorney Client; Work Product	Confidential communication between Darrell Davila and attorney, made for the purpose of facilitating the rendition of legal advice in connection with redistricting legislation.	
DOC_0012514	Lieutenant Governor Dan Patrick	PNG			Darrell Davila (Lt. Gov. Chief of Staff)	Scott Keller (attorney)			Attorney Client; Work Product	Confidential communication between Darrell Davila and attorney, made for the purpose of facilitating the rendition of legal advice in connection with redistricting legislation.	
DOC_0012515	Lieutenant Governor Dan Patrick	PNG			Darrell Davila (Lt. Gov. Chief of Staff)	Scott Keller (attorney)			Attorney Client; Work Product	Confidential communication between Darrell Davila and attorney, made for the purpose of facilitating the rendition of legal advice in connection with redistricting legislation.	
DOC_0012516	Lieutenant Governor Dan Patrick	PNG			Darrell Davila (Lt. Gov. Chief of Staff)	Scott Keller (attorney)			Attorney Client; Work Product	Confidential communication between Darrell Davila and attorney, made for the purpose of facilitating the rendition of legal advice in connection with redistricting legislation.	
DOC_0012517	Lieutenant Governor Dan Patrick	PNG			Darrell Davila (Lt. Gov. Chief of Staff)	Scott Keller (attorney)			Attorney Client; Work Product	Confidential communication between Darrell Davila and attorney, made for the purpose of facilitating the rendition of legal advice in connection with redistricting legislation.	
DOC_0012522	Lieutenant Governor Dan Patrick	JPG			Darrell Davila (Lt. Gov. Chief of Staff)	Luis Saenz (Gov. Abbott Chief of Staff)			Legislative	Confidential communication between Darrell Davila and Luis Saenz regarding redistricting, reflecting legislative thoughts, opinions, and mental impressions.	Ex. V at 2
DOC_0012554	Lieutenant Governor Dan Patrick	JPG			Darrell Davila (Lt. Gov. Chief of Staff)	Alix Morris (attorney) (Lt. Gov. Deputy General Counsel)			Legislative; Attorney Client; Work Product	Confidential communication between Lieutenant Governor Patrick and/or his staff made for a legislative purpose and reflecting privileged information, including thoughts, opinions, and mental impressions. Additionally, the document reflects confidential legal advice provided by counsel and the thoughts and mental impressions of counsel.	Ex. C at 89; Ex. Q at 89
DOC_0352791	Representative Jacey Jetton	JPG							Legislative	Data and related materials relating to draft redistricting legislation for House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 6
DOC_0352792	Representative Jacey Jetton	JPG							Legislative	Data and related materials relating to draft redistricting legislation for House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 6
DOC_0352802	Representative Jacey Jetton	PDF	Tori Macfarlan						Legislative	Communications received from members of the public regarding redistricting, with internal notes.	
DOC_0352803	Representative Jacey Jetton	XLSX	Tori Macfarlan						Legislative	Communications received from members of the public regarding redistricting, with internal notes.	
DOC_0352804	Representative Jacey Jetton	PDF	Tori Macfarlan						Legislative	Communications received from members of the public regarding redistricting, with internal notes.	
DOC_0352805	Representative Jacey Jetton	XLSX	Tori Macfarlan						Legislative	Communications received from members of the public regarding redistricting, with internal notes.	

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	Included in Private Plaintiffs' First Supplemental Brief (Dkt. 709)
PDOC_001960	Representative Todd Hunter								Legislative; Attorney Client	Confidential invoices, identifying privileged work performed at the direction of legislative members or at the direction of counsel, for legal services rendered in connection with redistricting legislation.	Ex. G at 48
PDOC_001968	Representative Todd Hunter								Legislative; Attorney Client	Confidential invoices, identifying privileged work performed at the direction of legislative members or at the direction of counsel, for legal services rendered in connection with redistricting legislation.	Ex. G at 48
PDOC_001986	Representative Todd Hunter								Legislative; Attorney Client	Confidential invoices, identifying privileged work performed at the direction of legislative members or at the direction of counsel, for legal services rendered in connection with redistricting legislation.	Ex. G at 48
PDOC_001997	Representative Todd Hunter								Legislative; Attorney Client	Confidential invoices, identifying privileged work performed at the direction of legislative members or at the direction of counsel, for legal services rendered in connection with redistricting legislation.	Ex. G at 48
PDOC_002004	Representative Todd Hunter								Legislative	Confidential letter from Congresswoman Eddie Bernice Johnson to Chairman Hunter regarding redistricting legislation.	
PDOC_002078	Representative Todd Hunter								Legislative	Confidential letter from Congresswoman Shiela Jackson-Lee to Chairman Hunter regarding redistricting legislation.	
PDOC_002935	Lieutenant Governor Dan Patrick								Legislative	Confidential communication between Lieutenant Governor Patrick and other legislators regarding draft redistricting legislation, made for a legislative purpose and reflecting privileged information, including thoughts, opinions, and mental impressions.	Ex. C at 89; Ex. Q at 89
PDOC_002955	Lieutenant Governor Dan Patrick								Legislative	Confidential draft maps and data relating to draft redistricting legislation for congressional districts, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	Ex. C at 90; Ex. G at 3; Ex. Q at 90
PDOC_002956	Lieutenant Governor Dan Patrick								Legislative	Confidential draft maps and data relating to draft redistricting legislation for congressional districts, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	Ex. C at 90; Ex. G at 3; Ex. Q at 90
PDOC_004650	Representative Brooks Landgraf								Legislative	Data and related materials relating to draft redistricting legislation for House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 4

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	Included in Private Plaintiffs' First Supplemental Brief (Dkt. 709)
DOC_0000027	Anna Mackin	DOCX	Sean Opperman (attorney)	10/16/2021					Legislative; Attorney Client	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements. Includes contributions from counsel retained for the purpose of advising on the legality of the proposed legislation.	Ex. G at 143
DOC_0000064	Anna Mackin	PDF							Legislative; Attorney Client; Work Product	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements. Includes contributions from counsel retained for the purpose of advising on the legality of the proposed legislation.	Ex. G at 143
DOC_0000065	Anna Mackin	PDF							Legislative; Attorney Client; Work Product	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements. Includes contributions from counsel retained for the purpose of advising on the legality of the proposed legislation.	Ex. G at 143
DOC_0000066	Anna Mackin	PDF							Legislative; Attorney Client; Work Product	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements. Includes contributions from counsel retained for the purpose of advising on the legality of the proposed legislation.	Ex. G at 143
DOC_0000077	Anna Mackin	DOCX		8/26/2021					Legislative; Attorney Client; Work Product	Calendar entries relating to redistricting, including hearings and meetings with legislators and staffers.	Ex. G at 164
DOC_0000078	Anna Mackin	DOCX		8/26/2021					Legislative; Attorney Client; Work Product	Calendar entries relating to redistricting, including hearings and meetings with legislators and staffers.	Ex. G at 164
DOC_0000084	Anna Mackin	DOCX	Anna Mackin	10/16/2021					Legislative	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements. Includes contributions from counsel retained for the purpose of advising on the legality of the proposed legislation.	
DOC_0000093	Anna Mackin	PDF	Jordan Death (Senate Research Center)	9/29/2021					Legislative; Attorney Client; Work Product	Confidential Senate Research Center analysis of Senate Redistricting Committee hearing, sent to committee members, and kept in Senator Huffman's personal files for the purpose of considering redistricting legislation.	
DOC_0000094	Anna Mackin	PDF	Jo Walston (Senate Research Center)	10/1/2021					Legislative; Attorney Client; Work Product	Confidential Senate Research Center analysis of Senate Redistricting Committee hearing, sent to committee members, and kept in Senator Huffman's personal files for the purpose of considering redistricting legislation.	
DOC_0000095	Anna Mackin	PDF	Kenneth Bryan (Senate Research Center)	2/22/2021					Legislative; Attorney Client; Work Product	Confidential Senate Research Center analysis of Senate Redistricting Committee hearing, sent to committee members, and kept in Senator Huffman's personal files for the purpose of considering redistricting legislation.	
DOC_0000096	Anna Mackin	PDF	Kenneth Bryan (Senate Research Center)	3/11/2021					Legislative; Attorney Client; Work Product	Confidential Senate Research Center analysis of Senate Redistricting Committee hearing, sent to committee members, and kept in Senator Huffman's personal files for the purpose of considering redistricting legislation.	
DOC_0000097	Anna Mackin	PDF	Kenneth Bryan (Senate Research Center)	3/15/2021					Legislative; Attorney Client; Work Product	Confidential Senate Research Center analysis of Senate Redistricting Committee hearing, sent to committee members, and kept in Senator Huffman's personal files for the purpose of considering redistricting legislation.	
DOC_0000098	Anna Mackin	PDF	Andrew Robison (Senate Research Center)	3/16/2021					Legislative; Attorney Client; Work Product	Confidential Senate Research Center analysis of Senate Redistricting Committee hearing, sent to committee members, and kept in Senator Huffman's personal files for the purpose of considering redistricting legislation.	
DOC_0000101	Anna Mackin	DOCX		8/27/2021					Legislative; Attorney Client; Work Product	Confidential draft retention contract for use in connection with redistricting legislation	Ex. G at 165
DOC_0000106	Anna Mackin	PDF	Sean Opperman (attorney)	9/23/2021					Legislative; Attorney Client; Work Product	Attachment to confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	Ex. G at 143
DOC_0000108	Anna Mackin	DOCX	Sean Opperman (attorney)	10/3/2021					Legislative; Attorney Client; Work Product	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	Ex. G at 143

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	Included in Private Plaintiffs' First Supplemental Brief (Dkt. 709)
DOC_0000117	Anna Mackin	PDF		9/12/2021					Legislative; Attorney Client; Work Product	Confidential invoice for legal services provided in connection with redistricting legislation, given to Senate Redistricting Committee Staff.	Ex. G at 165
DOC_0000118	Anna Mackin	PDF		10/7/2021					Legislative; Attorney client; work product	Confidential invoice for legal services provided in connection with redistricting legislation, given to Senate Redistricting Committee Staff.	Ex. G at 165
DOC_0000129	Anna Mackin	PDF		9/14/2021					Legislative; Attorney Client; Work Product	Confidential draft retention contract for use in connection with redistricting legislation	Ex. G at 165
DOC_0000133	Anna Mackin	PDF		10/7/2021					Legislative	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	Ex. G at 144
DOC_0000134	Anna Mackin	PDF		10/7/2021					Legislative	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	Ex. G at 144
DOC_0000135	Anna Mackin	PDF		10/7/2021					Legislative	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	Ex. G at 144
DOC_0000139	Anna Mackin	PDF		10/1/2021					Legislative	Confidential draft of redistricting legislation, relating to proposed districts, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	
DOC_0000140	Anna Mackin	PDF		10/1/2021					Legislative	Confidential draft of redistricting legislation, relating to proposed districts, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	
DOC_0000141	Anna Mackin	PDF		10/1/2021					Legislative	Confidential draft of redistricting legislation, relating to proposed districts, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	
DOC_0000142	Anna Mackin	PDF		10/1/2021					Legislative	Confidential draft of redistricting legislation, relating to proposed districts, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	
DOC_0000145	Anna Mackin	PDF		10/8/2021					Legislative	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	Ex. G at 144
DOC_0000146	Anna Mackin	PDF		10/8/2021					Legislative	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	Ex. G at 144
DOC_0000147	Anna Mackin	PDF		10/8/2021					Legislative	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	Ex. G at 144
DOC_0000182	Anna Mackin	PDF		9/26/2021					Legislative	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	Ex. G at 144
DOC_0000183	Anna Mackin	PDF		9/30/2021					Legislative	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	Ex. G at 144
DOC_0000184	Anna Mackin	PDF		10/4/2021					Legislative	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	Ex. G 144
DOC_0000195	Anna Mackin	PDF		8/5/2021					Legislative	Confidential invoice for legal services provided in connection with redistricting legislation, given to Senate Redistricting Committee Staff.	Ex. G at 165
DOC_0000197	Anna Mackin	PDF		9/27/2021					Legislative	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	Ex. G at 144

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	Included in Private Plaintiffs' First Supplemental Brief (Dkt. 709)
DOC_0000199	Anna Mackin	DOCX	Sean Opperman (attorney)	10/16/2021					Legislative; attorney client	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	Ex. G at 145
DOC_0000210	Anna Mackin	DOCX		8/30/2021					Legislative	Calendar entries relating to redistricting, including hearings, and meetings with legislators and staffers.	Ex. G at 164
DOC_0000213	Anna Mackin	PDF		4/13/2021					Legislative; Attorney Client; Work Product	Confidential retention letter from Lebotsky Keller to Lieutenant Governor Patrick and Senator Huffman, setting forth scope of representation and describing related redistricting legal issues, made for the purpose of facilitating the rendition of legal advice regarding redistricting litigation. The retention of Lebotsky Kelly and the firm's scope of work also reveals mental impressions on legislative process and policy.	Ex. G at 165
DOC_0000217	Anna Mackin	PDF		9/8/2021					Legislative; Attorney Client; Work Product	Confidential draft retention contract for use in connection with redistricting legislation	Ex. G at 165
DOC_0000218	Anna Mackin	PDF		9/8/2021		PDF			Legislative	Confidential draft retention contract for use in connection with redistricting legislation	Ex. G at 165
DOC_0000219	Anna Mackin	PDF		9/13/2021					Legislative	Confidential draft retention contract for use in connection with redistricting legislation	Ex. G at 165
DOC_0000220	Anna Mackin	DOCX		8/31/2021					Legislative	Confidential draft retention contract for use in connection with redistricting legislation	Ex. G at 165
DOC_0000267	Anna Mackin	DOCX	Anna Mackin (attorney)	10/17/2021					Legislative; Attorney Client; Work Product	Summary of proposed redistricting legislation relating to proposed districts, prepared by Anna Mackin (attorney) for Senator Huffman's use in considering redistricting legislation, reflecting and implicating legislative and attorney privileged thoughts, opinions, and mental impressions.	
DOC_0000270	Anna Mackin	DOCX	Anna Mackin (attorney)	10/7/2021					Legislative; Attorney Client; Work Product	Summary of proposed redistricting legislation relating to proposed districts, prepared by Anna Mackin (attorney) for Senator Huffman's use in considering redistricting legislation, reflecting and implicating legislative and attorney privileged thoughts, opinions, and mental impressions.	
DOC_0000273	Anna Mackin	DOCX	Anna Mackin (attorney)	10/16/2021					Legislative; Attorney Client; Work Product	Summary of proposed redistricting legislation relating to proposed districts, prepared by Anna Mackin (attorney) for Senator Huffman's use in considering redistricting legislation, reflecting and implicating legislative and attorney privileged thoughts, opinions, and mental impressions.	
DOC_0000274	Anna Mackin	DOCX	Anna Mackin (attorney)	10/12/2021					Legislative	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	Ex. G at 145
DOC_0000277	Anna Mackin	DOCX	Anna Mackin (attorney)	9/30/2021					Legislative	Typed notes regarding redistricting legislation relating to proposed districts, kept for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	
DOC_0000280	Anna Mackin	DOCX	Anna Mackin (attorney)	10/17/2021					Legislative; Attorney Client	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	Ex. G at 145
DOC_0000351	Anna Mackin	DOCX	Sean Opperman (attorney)	8/26/2021					Legislative; Attorney Client; Work Product	Draft schedule for the redistricting process, prepared for Senator Huffman by Anna Mackin (attorney), reflecting and implicating legislative privileged thoughts, opinions, and mental impressions, as well as attorney advice and mental impressions.	
DOC_0000353	Anna Mackin	DOCX	Anna Mackin (attorney)	1/29/2021					Legislative Attorney client; work product	Draft schedule for the redistricting process, prepared for Senator Huffman by Anna Mackin (attorney), reflecting and implicating legislative privileged thoughts, opinions, and mental impressions, as well as attorney advice and mental impressions.	
DOC_0001080	Anna Mackin	MSG		10/16/2021	Anna Mackin (attorney)	Sean Opperman (attorney)			Legislative Attorney client; work product	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	Ex. G at 145
DOC_0001268	Anna Mackin	MSG		8/27/2021	Gardner Pate; Jeff Oldham (attorney); Courtney Hjalman; Angela Colmenero	Sean Opperman (attorney)	Anna Mackin (attorney)		Legislation	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	Ex. G at 147; Ex. V at 11
DOC_0001269	Anna Mackin	DOCX		8/26/2021					Legislature	Calendar entries relating to redistricting, including hearings, and meetings with legislators and staffers.	Ex. G at 164

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	Included in Private Plaintiffs' First Supplemental Brief (Dkt. 709)
DOC_0001270	Anna Mackin	DOCX		8/26/2021					Legislature	Calendar entries relating to redistricting, including hearings and meetings with legislators and staffers.	Ex. G at 164
DOC_0001271	Anna Mackin	MSG		8/30/2021	Gardner Pate; Jeff Oldham (attorney); Courtney Hjaltman; Angela Colmenaro (attorney).	Sean Opperman (attorney)	Anna Mackin		Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	Ex. G at 147; Ex. V at 11
DOC_0001272	Anna Mackin	DOCX		8/30/2021					Legislative	Calendar entries relating to redistricting, including hearings and meetings with legislators and staffers.	Ex. G at 164
DOC_0001283	Anna Mackin	MSG		9/8/2021	Anna Mackin (attorney)	Brad Lockerbie (consultant)			Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	Ex. G at 148; Ex. V at 11
DOC_0001284	Anna Mackin	PDF		9/8/2021					Legislative	Confidential draft retention contract for use in connection with redistricting legislation	Ex. G at 165
DOC_0001285	Anna Mackin	MSG		9/8/2021	Anna Mackin (attorney)	Brad Lockerbie (consultant)			Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	Ex. G at 148; Ex. V at 12
DOC_0001286	Anna Mackin	PDF		9/8/2021					Legislative	Confidential draft retention contract for use in connection with redistricting legislation	Ex. G at 165
DOC_0001326	Anna Mackin	MSG		9/19/2021	Anna Mackin (attorney); Sean Opperman (attorney)	Wendy Underhill	Ben Williams		Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	Ex. G at 150; Ex. V at 12
DOC_0001358	Anna Mackin	PDF		9/26/2021					Legislative	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	Ex. G at 152
DOC_0001431	Anna Mackin	MSG		9/30/2021	Sean Opperman (attorney)	Jared May (TLC)			Legislative Attorney client; work product	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	Ex. G at 157
DOC_0001432	Anna Mackin	PDF							Legislative; Attorney Client; Work Product	Analysis on draft redistricting legislation relating to proposed district, with related data. Includes contributions and advice from counsel on the legality of the proposed legislation. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions legislative process and judgements. Includes contributions and advice from counsel on the legality of the proposed district.	Ex. G at 157
DOC_0001433	Anna Mackin	PDF		9/30/2021					Legislative; Attorney Client; Work Product	Analysis on draft redistricting legislation relating to proposed district, with related data. Includes contributions and advice from counsel on the legality of the proposed legislation. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions legislative process and judgements. Includes contributions and advice from counsel on the legality of the proposed district.	Ex. G at 157
DOC_0001434	Anna Mackin	MSG		10/1/2021	Jared May (TLC); Anna Mackin (attorney)	Sean Opperman (attorney)			Legislative; Attorney Client; Work Product	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	Ex. G at 157
DOC_0001455	Anna Mackin	MSG		10/1/2021	Anna Mackin (attorney)	Sean Opperman (attorney)			Legislative; Attorney Client; Work Product	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	Ex. G at 158
DOC_0001456	Anna Mackin	PDF		10/1/2021					Legislative; Attorney Client; Work Product	Attachment to confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	Ex. G at 158
DOC_0001457	Anna Mackin	PDF		10/1/2021					Legislative Attorney client; work product	Attachment to confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	Ex. G at 158

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	Included in Private Plaintiffs' First Supplemental Brief (Dkt. 709)
DOC_0001458	Anna Mackin	PDF		10/1/2021					Legislative; Attorney Client; Work Product	Attachment to confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	Ex. G at 158
DOC_0001459	Anna Mackin	PDF		10/1/2021					Legislative; attorney client; work Product	Attachment to confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	Ex. G at 158
DOC_0001473	Anna Mackin	MSG		10/3/2021	Anna Mackin (attorney)	Christopher Hilton (attorney)			Legislative Attorney client; work product	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	Ex. G at 158
DOC_0001474	Anna Mackin	DOCX	Sean Opperman (attorney)	10/3/2021					Attorney Client; Work product.	Attachment to confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	Ex. G at 158
DOC_0001508	Anna Mackin	MSG		10/4/2021	Sean Opperman (attorney); Anna Mackin (attorney)	Jared May (TLC)			Legislative; attorney client; work Product	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	Ex. G at 158
DOC_0001509	Anna Mackin	MSG		10/4/2021	jared May (TLC); Anna Mackin (attorney).	Sean Opperman (attorney)			Legislative attorney client; work product	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	Ex. G at 158
DOC_0001511	Anna Mackin	MSG		10/4/2021	Sean Opperman (attorney); Anna Mackin (attorney)	jared May (TLC)			Legislative; Attorney Client; Work Product	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	Ex. G at 158
DOC_0001512	Anna Mackin	PDF							Legislative; Attorney Client; Work Product	Analysis on draft redistricting legislation relating to proposed district, with related data. Includes contributions and advice from counsel on the legality of the proposed legislation. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions legislative process and judgements. includes contributions and advice from counsel on the legality of the proposed district.	Ex. G at 159
DOC_0001513	Anna Mackin	PDF		10/4/2021					Legislative; Attorney Client; Work Product	Analysis of draft redistricting legislation relating to proposed districts, with related data. Includes contributions and advice from counsel on the legality of the proposed legislation. Prepared for senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgement. Includes contributions and advice from counsel on the legality of the proposed districts.	Ex. G at 159
DOC_0001514	Anna Mackin	MSG		10/8/2021	Jared May (TLC); Anna Mackin (attorney)	Sean Opperman (attorney)			Legislative attorney client; work product	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	Ex. G at 159
DOC_0001516	Anna Mackin	PDF		8/12/2021					Legislative	Confidential invoice for legal services provided in connection with redistricting legislation, given to Senate Redistricting Committee Staff.	Ex. G at 165
DOC_0001517	Anna Mackin	PDF		8/5/2021					Legislative	Confidential invoice for legal services provided in connection with redistricting legislation, given to Senate Redistricting Committee Staff.	Ex. G at 165
DOC_0001519	Anna Mackin	PDF		10/7/2021					Legislative	Confidential invoice for legal services provided in connection with redistricting legislation, given to Senate Redistricting Committee Staff.	Ex. at 165
DOC_0001521	Anna Mackin	PDF		10/7/2021					Legislative	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for senator huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	Ex. G at 159
DOC_0001522	Anna Mackin	PDF		10/7/2021					Legislative	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	Ex. G at 159

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	Included in Private Plaintiffs' First Supplemental Brief (Dkt. 709)
DOC_0001523	Anna Mackin	PDF		10/7/2021					Legislative	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for senator huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	Ex. G at 159
DOC_0001538	Anna Mackin	MSG		10/8/2021	Sean Opperman (attorney); Anna Mackin (attorney)	Jared May (TLC)			Legislative; Attorney Client; Work Product	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	Ex. G at 159
DOC_0001539	Anna Mackin	MSG		10/8/2021	Sean Opperman (attorney); Anna Mackin (attorney)	Jared May (TLC)			Legislative attorney client; work product	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	Ex. G at 160
DOC_0001560	Anna Mackin	DOCX	Sean Opperman (attorney)	10/16/2021					Legislative; Attorney Client	Analysis on draft redistricting legislation relating to proposed districts, with related data. Includes contributions and advice from counsel on the legality of the proposed legislation. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements. Includes contributions and advice from counsel on the legality of the proposed maps.	Ex. G at 162
DOC_0001562	Anna Mackin	DOCX	Sean Opperman (attorney)	10/16/2021					Legislative; Attorney Client	Analysis on draft redistricting legislation relating to proposed districts, with related data. Includes contributions and advice from counsel on the legality of the proposed legislation. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements. Includes contributions and advice from counsel on the legality of the proposed maps.	Ex. G at 162
DOC_0001563	Anna Mackin	MSG		10/17/2021	Anna Mackin (attorney); Sean Opperman (attorney)	Jared My (TLC)			Legislative; Attorney Client; Work Product	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	Ex. G at 163
DOC_0001972	Senator Joan Huffman	PDF		8/22/2021					Legislative	Data relating to draft redistricting legislation for congressional districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 9
DOC_0001974	Senator Joan Huffman	PDF		8/19/2021					Legislative	Data relating to draft redistricting legislation for congressional districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 9
DOC_0001975	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	9/20/2021					Legislative; Attorney Client; Work Product	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts, including input from attorneys relating to proposed redistricting legislation.	Ex. G at 10
DOC_0001976	Senator Joan Huffman	DOCX	Anna Mackin (attorney)	10/7/2021					Legislative	Confidential draft talking points for committee or Senate floor regarding draft redistricting legislation, including input from attorneys relating to proposed redistricting legislation.	Ex. G at 10
DOC_0001977	Senator Joan Huffman	DOCX	Anna Mackin (attorney)	10/14/2021					Legislative; Attorney Client; Work Product	Confidential draft talking points for committee or Senate floor regarding draft redistricting legislation, including input from attorneys relating to proposed redistricting legislation.	Ex. G at 10
DOC_0001978	Senator Joan Huffman	DOCX	Anna Mackin (attorney)	10/7/2021					Legislative; Attorney Client; Work Product	Confidential draft talking points for committee or Senate floor regarding draft redistricting legislation, including input from attorneys relating to proposed redistricting legislation.	Ex. G at 10
DOC_0001979	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	10/3/2021					Legislative; Attorney Client; Work Product	Confidential draft talking points for committee or Senate floor regarding draft redistricting legislation, including input from attorneys relating to proposed redistricting legislation.	Ex. G at 10
DOC_0001980	Senator Joan Huffman	PDF		10/8/2021					Legislative	Data relating to draft redistricting legislation for congressional districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 10
DOC_0001981	Senator Joan Huffman	PDF		9/27/2021					Legislative	Data relating to draft redistricting legislation for congressional districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 10
DOC_0001982	Senator Joan Huffman	PDF	State of Texas	9/29/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	Ex. G at 10; Ex. V at 2
DOC_0001983	Senator Joan Huffman	DOCX	SO	9/27/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	Ex. G at 10; Ex. V at 2
DOC_0001986	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	10/17/2021					Legislative; Attorney Client; Work Product	Confidential bill draft and related materials, regarding draft redistricting legislation, including input from attorneys relating to proposed redistricting legislation.	Ex. G at 10
DOC_0001987	Senator Joan Huffman	DOCX	Allison Schmitz	10/16/2021					Legislative; Attorney Client; Work Product	Confidential bill draft and related materials, regarding draft redistricting legislation, including input from attorneys relating to proposed redistricting legislation.	Ex. G at 10; Ex. V at 2

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	Included in Private Plaintiffs' First Supplemental Brief (Dkt. 709)
DOC_0001988	Senator Joan Huffman	DOCX	Allison Schmitz	10/16/2021					Legislative; Attorney Client; Work Product	Confidential bill draft and related materials, regarding draft redistricting legislation, including input from attorneys relating to proposed redistricting legislation.	Ex. G at 10; Ex. V at 2
DOC_0001989	Senator Joan Huffman	DOCX	Zachary Stephenson	10/16/2021					Legislative; Attorney Client; Work Product	Confidential bill draft and related materials, regarding draft redistricting legislation, including input from attorneys relating to proposed redistricting legislation.	Ex. G at 10; Ex. V at 2
DOC_0001990	Senator Joan Huffman	PDF		9/26/2021					Legislative	Data relating to draft redistricting legislation for congressional districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 10
DOC_0001991	Senator Joan Huffman	DOCX	Anna Mackin	10/3/2021					Legislative	Confidential analysis of proposed amendments relating to the legislative redistricting process.	Ex. G at 10
DOC_0001993	Senator Joan Huffman	DOCX	Anna Mackin (attorney)	9/29/2021					Legislative; Attorney Client; Work Product	Confidential draft talking points for committee or Senate floor regarding draft redistricting legislation, including input from attorneys relating to proposed redistricting legislation.	Ex. G at 10
DOC_0001994	Senator Joan Huffman	DOCX	Sarah Willcox	10/12/2021					Legislative; Attorney Client; Work Product	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, including input from attorneys relating to proposed redistricting legislation.	Ex. G at 10; Ex. V at 2
DOC_0001995	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	10/12/2021					Legislative; Attorney Client; Work Product	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, including input from attorneys relating to proposed redistricting legislation.	Ex. G at 11
DOC_0001996	Senator Joan Huffman	DOCX	Sarah Willcox	10/3/2021					Legislative; Attorney Client; Work Product	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, including input from attorneys relating to proposed redistricting legislation.	Ex. G at 11; Ex. V at 2
DOC_0001997	Senator Joan Huffman	DOCX	Sarah Willcox	10/1/2021					Legislative; Attorney Client; Work Product	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, including input from attorneys relating to proposed redistricting legislation.	Ex. G at 11; Ex. V at 2
DOC_0001999	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	10/1/2021					Legislative; Attorney Client; Work Product	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, including input from attorneys relating to proposed redistricting legislation.	Ex. G at 11
DOC_0002001	Senator Joan Huffman	DOCX	Sarah Willcox	9/21/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	Ex. G at 11; Ex. V at 2
DOC_0002002	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	9/22/2021					Legislative; Attorney Client; Work Product	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, including input from attorneys relating to proposed redistricting legislation.	Ex. G at 11
DOC_0002004	Senator Joan Huffman	DOCX	Sarah Willcox	9/21/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	Ex. G at 11
DOC_0002005	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	9/24/2021					Legislative; Attorney Client; Work Product	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, including input from attorneys relating to proposed redistricting legislation.	Ex. G at 11
DOC_0002006	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	9/27/2021					Legislative; Attorney Client; Work Product	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, including input from attorneys relating to proposed redistricting legislation.	Ex. G at 11
DOC_0002007	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	9/28/2021					Legislative; Attorney Client; Work Product	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, including input from attorneys relating to proposed redistricting legislation.	Ex. G at 11
DOC_0002008	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	9/27/2021					Legislative; Attorney Client; Work Product	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, including input from attorneys relating to proposed redistricting legislation.	Ex. G at 11
DOC_0002011	Senator Joan Huffman	DOCX	Sarah Willcox	9/29/2021					Legislative; Attorney Client; Work Product	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, including input from attorneys relating to proposed redistricting legislation.	Ex. G at 11
DOC_0002012	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	9/29/2021					Legislative; Attorney Client; Work Product	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, including input from attorneys relating to proposed redistricting legislation.	Ex. G at 11
DOC_0002023	Senator Joan Huffman	DOCX	Anna Mackin (attorney)	10/12/2021					Legislative; Attorney Client; Work Product	Confidential bill draft and related materials, regarding draft redistricting legislation, including input from attorneys relating to proposed redistricting legislation.	Ex. G at 12
DOC_0002140	Senator Joan Huffman	DOCX	Anna Mackin (attorney)	10/16/2021					Legislative	Data relating to draft redistricting legislation for congressional districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 15

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	Included in Private Plaintiffs' First Supplemental Brief (Dkt. 709)
DOC_0002141	Senator Joan Huffman	DOCX	Anna Mackin (attorney)	8/31/2021					Legislative	Data relating to draft redistricting legislation for congressional districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 15
DOC_0002142	Senator Joan Huffman	DOCX	Anna Mackin (attorney)	8/18/2021					Legislative	Data relating to draft redistricting legislation for congressional districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 15
DOC_0002278	Senator Joan Huffman	XLS							Legislative	Data relating to draft redistricting legislation for state senate districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 15
DOC_0002307	Senator Joan Huffman	XLSX	Kurt Gore	12/15/2020					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 15
DOC_0002351	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	2/28/2020					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	Ex. G at 15
DOC_0002362	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/18/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	Ex. G at 16
DOC_0002363	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/7/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	Ex. G at 16
DOC_0002367	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/7/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	Ex. G at 16
DOC_0002374	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/18/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	Ex. G at 16
DOC_0002381	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/26/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	Ex. G at 16
DOC_0002390	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/27/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	Ex. G at 16
DOC_0002391	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/27/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	Ex. G at 16
DOC_0002399	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/28/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	Ex. G at 16
DOC_0002400	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/22/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	Ex. G at 16
DOC_0002405	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	2/12/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	Ex. G at 16
DOC_0002406	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	2/10/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	Ex. G at 16
DOC_0002407	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/22/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	Ex. G at 16
DOC_0002415	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/22/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	Ex. G at 16
DOC_0002420	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	2/1/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	Ex. G at 16
DOC_0002421	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	2/1/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	Ex. G at 16
DOC_0002426	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	2/2/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	Ex. G at 16
DOC_0002427	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/22/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	Ex. G at 17
DOC_0002436	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	2/2/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	Ex. G at 17
DOC_0002437	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/22/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	Ex. G at 17
DOC_0002445	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	2/12/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	Ex. G at 17

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	Included in Private Plaintiffs' First Supplemental Brief (Dkt. 709)
DOC_0002446	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/22/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	Ex. G at 17
DOC_0002454	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	2/12/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	Ex. G at 17
DOC_0002455	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/22/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	Ex. G at 17
DOC_0002462	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	2/12/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	Ex. G at 17
DOC_0002463	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/22/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	Ex. G at 17
DOC_0002466	Senator Joan Huffman	DOCX	Anna Mackin(attorney)	3/13/2021					Legislative; Attorney Client; Work Product	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, including input from attorneys relating to proposed redistricting legislation.	Ex. G at 17
DOC_0002481	Senator Joan Huffman	PDF		12/30/2019					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, including input from attorneys relating to proposed redistricting legislation .	Ex. G at 17
DOC_0002483	Senator Joan Huffman	PDF		12/31/2019					Legislative; Attorney Client; Work Product	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, including input from attorneys relating to proposed redistricting legislation .	Ex. G at 18
DOC_0002487	Senator Joan Huffman	PDF		5/15/2020					Legislative; Attorney Client; Work Product	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, including input from attorneys relating to proposed redistricting legislation.	Ex. G at 18
DOC_0002488	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	10/7/2019					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	Ex. G at 18
DOC_0002514	Senator Joan Huffman	XLSX	Sean Opperman (attorney)	1/24/2020					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	Ex. G at 18
DOC_0002516	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/6/2020					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	Ex. G at 18
DOC_0002550	Senator Joan Huffman	PDF		9/14/2021					Legislative; Attorney Client	Confidential contract for the retention of expert services and related materials, sought for the purpose of providing expert consultation to aid in drafting and considering redistricting legislation.	Ex. G at 48
DOC_0002555	Senator Joan Huffman	PDF	ATC	9/8/2021					Legislative; Attorney Client; Work Product	Confidential contract for the retention of expert services and related materials, sought for the purpose of providing expert consultation to aid in drafting and considering redistricting legislation.	Ex. G at 49; Ex. V at 3
DOC_0002557	Senator Joan Huffman	PDF		9/9/2021					Legislative; Attorney Client; Work Product	Confidential contract for the retention of expert services and related materials, sought for the purpose of providing expert consultation to aid in drafting and considering redistricting legislation.	Ex. G at 49
DOC_0002558	Senator Joan Huffman	XLSX	Sean opperman (attorney)	3/29/2019					Legislative; Attorney Client	Confidential invoice relating to expert services, sou ght for the purpose of providing expert consultation to aid in drafting and considering redistricting legislation.	Ex. G at 49
DOC_0002559	Senator Joan Huffman	PDF		4/13/2021					Legislative; Attorney Client; Work Product	Confidential contract for the retention of outside legal counsel, sought for the purpose of receiving legal advice in connection with redistricting legislation.	Ex. G at 49
DOC_0002560	Senator Joan Huffman	PDF		4/13/2021					Legislative; Attorney Client; Work Product	Confidential contract for the retention of outside legal counsel, sought for the purpose of receiving legal advice in connection with redistricting legislation.	Ex. G at 49
DOC_0002562	Senator Joan Huffman	PDF		7/22/2021					Legislative; Attorney Client; Work Product	Confidential invoice relating to outside legal counsel, sought for the pupose of receiving legal advice in connection with redistricting legislation.	Ex. G at 49
DOC_0002563	Senator Joan Huffman	PDF		8/12/2021					Legislative; Attorney Client; Work Product	Confidential invoice relating to outside legal counsel, sought for the purpose of receiving legal advice in connection with redistricting legislation.	Ex. G at 49
DOC_0002564	Senator Joan Huffman	PDF		10/7/2021					Legislative; Attorney Client; Work Product	Confidential invoice relating to outside legal counsel, sought for the pupose of receiving legal advice in connection with redistricting legislation.	Ex. G at 49
DOC_0002565	Senator Joan Huffman	PDF		8/5/2021					Legislative; Attorney Client; Work Product	Confidential invoice relating to outside legal counsel, sought for the purpose of receiving legal advice in connection with redistricting legislation.	Ex. G at 49

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	Included in Private Plaintiffs' First Supplemental Brief (Dkt. 709)
DOC_0002566	Senator Joan Huffman	PDF		6/8/2021					Legislative; Attorney Client; Work Product	Confidential invoice relating to outside legal counsel, sought for the purpose of receiving legal advice in connection with redistricting legislation.	Ex. G at 49
DOC_0002567	Senator Joan Huffman	PDF		8/12/2021					Legislative; Attorney Client; Work Product	Confidential invoice relating to outside legal counsel, sought for the purpose of receiving legal advice in connection with redistricting legislation.	Ex. G at 49
DOC_0002568	Senator Joan Huffman	PDF		8/5/2021					Legislative; Attorney Client; Work Product	Confidential invoice relating to outside legal counsel, sought for the purpose of receiving legal advice in connection with redistricting legislation.	Ex. G at 49
DOC_0002577	Senator Joan Huffman	PDF	JSA	3/26/2021					Legislative; Attorney Client; Work Product	Confidential memorandum from Texas Legislative Council to members of the legislature relating to redistricting materials.	Ex. G at 19; Ex. V at 3
DOC_0002578	Senator Joan Huffman	PDF	JSA	3/26/2021					Legislative; Attorney Client; Work Product	Confidential memorandum from Texas Legislative Council to members of the legislature relating to redistricting materials.	Ex. G at 19; Ex. V at 3
DOC_0002692	Senator Joan Huffman	PDF		10/3/2019					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 21
DOC_0002693	Senator Joan Huffman	PDF		9/30/2019					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 21
DOC_0002694	Senator Joan Huffman	PDF		10/2/2019					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 21
DOC_0002695	Senator Joan Huffman	PDF		10/1/2019					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 21
DOC_0002700	Senator Joan Huffman	XLSX	KAG	2/20/2015					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 21; Ex. V at 3
DOC_0006820	Senator Joan Huffman	XLSX	Jared May	8/15/2021					Legislative	Data relating to draft redistricting legislation for state board of education districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 23
DOC_0006821	Senator Joan Huffman	XLSX	Michael Hankins	8/13/2021					Legislative	Data relating to draft redistricting legislation for state board of education districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 23; Ex. V at 5
DOC_0006822	Senator Joan Huffman	PDF		8/16/2021					Legislative	Data relating to draft redistricting legislation for state board of education districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 23
DOC_0006823	Senator Joan Huffman	PDF		8/23/2021					Legislative	Data relating to draft redistricting legislation for state board of education districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 23
DOC_0006825	Senator Joan Huffman	PDF		8/20/2021					Legislative	Data relating to draft redistricting legislation for state board of education districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 23
DOC_0006826	Senator Joan Huffman	PDF		10/19/2021					Legislative	Data relating to draft redistricting legislation for state board of education districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 23
DOC_0006828	Senator Joan Huffman	PDF		10/21/2021					Legislative	Data relating to draft redistricting legislation for state board of education districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 23
DOC_0006849	Senator Joan Huffman	PDF		10/1/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation for congressional districts.	Ex. G at 23
DOC_0006850	Senator Joan Huffman	PDF		10/1/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation for congressional districts.	Ex. G at 23
DOC_0006851	Senator Joan Huffman	PDF		10/1/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation for congressional districts.	Ex. G at 23
DOC_0006852	Senator Joan Huffman	PDF		10/1/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation for congressional districts.	Ex. G at 23
DOC_0006853	Senator Joan Huffman	PDF		10/5/2021	Senator Jean Huffman; Representative Todd Hunter	Congresswoman Sheila Jackson Lee; Congressman Al Green	Members of the Texas Senate and Texas House		Legislative	Confidential communication from Congresswoman Sheila Jackson Lee and Congressman Al Green to Senator Joan Huffman and Representative Todd Hunter, regarding draft redistricting legislation for congressional districts.	Ex. G at 23; Ex. V at 5
DOC_0006868	Senator Joan Huffman	PDF	State of Texas	10/4/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	Ex. G at 24; Ex. V at 5
DOC_0006869	Senator Joan Huffman	PDF		10/4/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	Ex. G at 24
DOC_0006870	Senator Joan Huffman	PDF		10/4/2021					Legislative	Data relating to draft redistricting legislation for congressional districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 24
DOC_0006871	Senator Joan Huffman	PDF		10/4/2021					Legislative	Data relating to draft redistricting legislation for congressional districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 24

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	Included in Private Plaintiffs' First Supplemental Brief (Dkt. 709)
DOC_0006873	Senator Joan Huffman	PDF	State of Texas	9/28/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	Ex. G at 24; Ex. V at 5
DOC_0007006	Senator Joan Huffman	PDF		12/31/2019					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 27
DOC_0007007	Senator Joan Huffman	PDF	o0600f0	1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 27; Ex. V at 6
DOC_0007008	Senator Joan Huffman	XLSX	KAG	2/20/2015					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 27; Ex. V at 6
DOC_0007010	Senator Joan Huffman	PDF		12/30/2019					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 27
DOC_0007073	Senator Joan Huffman	PDF		1/18/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 30
DOC_0007074	Senator Joan Huffman	PDF		1/18/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 30
DOC_0007075	Senator Joan Huffman	PDF		1/10/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 30
DOC_0007076	Senator Joan Huffman	PDF		1/10/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 30
DOC_0012239	Lieutenant Governor Dan Patrick	PDF		4/13/2021					Legislative; Attorney Client; Work Product	Confidential retention letter from outside attorneys to Lieutenant Governor Patrick for services in connection with considering redistricting legislation.	Ex. C at 87; Ex. G at 47; Ex. Q at 87
DOC_0012240	Lieutenant Governor Dan Patrick	DOCX	Scott Keller (attorney)	3/26/2021					Legislative; Attorney Client; Work Product	Confidential retention letter from outside attorneys to Lieutenant Governor Patrick for services in connection with considering redistricting legislation.	Ex. C at 87; Ex. G at 47; Ex. Q at 87
DOC_0012241	Lieutenant Governor Dan Patrick	DOCX	Scott Keller (attorney)	3/26/2021					Legislative; Attorney Client; Work Product	Confidential retention letter from outside attorneys to Lieutenant Governor Patrick for services in connection with considering redistricting legislation.	Ex. C at 87; Ex. G at 47; Ex. Q at 87
DOC_0012244	Lieutenant Governor Dan Patrick	DOCX	Steven Aranyi	10/8/2021					Legislative	Confidential retention letter from outside attorneys to Lieutenant Governor Patrick for services in connection with considering redistricting legislation.	Ex. C at 87; Ex. G at 47; Ex. Q at 87
DOC_0012398	Lieutenant Governor Dan Patrick	MSG		10/11/2021	Jeff Archer (TLC Executive Director)	Darrell Davila (Lt. Gov. Chief of Staff)	Sean Opperman (attorney); Anna Mackin (attorney); Chris Sterner (attorney); Alix Morris (attorney)		Legislative	Confidential communication between Lieutenant Governor Patrick staff and TLC regarding invoice for legal services provided in connection with redistricting litigation.	Ex. G at 47; Ex. C at 88; Ex. Q at 88; Ex. G at 47
DOC_0012399	Lieutenant Governor Dan Patrick	PDF		10/7/2021					Legislative	Attached invoice to confidential communication between Lieutenant Governor Patrick staff and TLC regarding invoice for legal services provided in connection with redistricting litigation.	Ex. C at 88; Ex. Q at 88; Ex. G at 47
DOC_0012419	Lieutenant Governor Dan Patrick	MSG		3/11/2021	Chris Sterner (attorney) (Lt. Gov. General Counsel)	Jeff Archer (TLC Executive Director)			Legislative	Attached invoice to confidential communication between Lieutenant Governor Patrick staff and TLC regarding invoice for legal services provided in connection with redistricting litigation.	Ex. C at 88; Ex. G at 47; Ex. Q at 88
DOC_0012420	Lieutenant Governor Dan Patrick	DOCX	ATC	3/11/2021					Legislative	Attached invoice to confidential communication between Lieutenant Governor Patrick staff and TLC regarding invoice for legal services provided in connection with redistricting litigation.	Ex. C at 88; Ex. G at 47; Ex. Q at 88
DOC_0352791	Representative Jacey Jetton	JPG							Legislative	Data and related materials relating to draft redistricting legislation for House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 6
DOC_0352792	Representative Jacey Jetton	JPG							Legislative	Data and related materials relating to draft redistricting legislation for House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 6
DOC_0352812	Representative Jacey Jetton	DOCX	Jacey Jetton	10/12/2021					Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	Ex. G at 6
DOC_0352817	Representative Jacey Jetton	DOCX	Jacey Jetton	10/15/2021					Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	Ex. G at 6
DOC_0352827	Representative Jacey Jetton	DOCX	Jacey Jetton	10/12/2021					Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	Ex. G at 6
DOC_0352829	Representative Jacey Jetton	DOCX	Jacey Jetton	10/12/2021					Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	Ex. G at 6

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	Included in Private Plaintiffs' First Supplemental Brief (Dkt. 709)
DOC_0352895	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 33
DOC_0352896	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 33
DOC_0352897	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 33
DOC_0352898	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 33
DOC_0352899	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 33
DOC_0352900	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 33
DOC_0352901	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 33
DOC_0352902	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 33
DOC_0352903	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 33
DOC_0352904	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 33
DOC_0352905	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 33
DOC_0352906	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 33
DOC_0352928	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 34
DOC_0352929	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 34
DOC_0352930	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 35
DOC_0352931	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 35
DOC_0352932	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 35
DOC_0352933	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 35
DOC_0352934	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 35

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	Included in Private Plaintiffs' First Supplemental Brief (Dkt. 709)
DOC_0352935	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 35
DOC_0352936	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 35
DOC_0352937	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 35
DOC_0352938	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 35
DOC_0352939	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 35
DOC_0352940	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 35
DOC_0352941	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 35
DOC_0352942	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 35
DOC_0352943	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 35
DOC_0352944	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 35
DOC_0352945	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 35
DOC_0352946	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 35
DOC_0352947	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 35
DOC_0352948	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 35
DOC_0352949	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 35
DOC_0352950	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 36
DOC_0352951	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 36
DOC_0352952	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 36
DOC_0352953	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 36

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	Included in Private Plaintiffs' First Supplemental Brief (Dkt. 709)
DOC_0352954	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 36
DOC_0352955	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 36
DOC_0352956	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 36
DOC_0352957	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 36
DOC_0352958	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 36
DOC_0352959	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 36
DOC_0352960	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 36
DOC_0352961	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 36
DOC_0352962	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 36
DOC_0352963	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 36
DOC_0352964	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 36
DOC_0352965	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 36
DOC_0352966	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 36
DOC_0352967	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 36
DOC_0352968	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 36
DOC_0352969	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 36
DOC_0352970	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 37
DOC_0352971	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 37
DOC_0352972	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 37

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	Included in Private Plaintiffs' First Supplemental Brief (Dkt. 709)
DOC_0352973	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 37
DOC_0352974	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 37
DOC_0352975	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 37
DOC_0352976	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 37
DOC_0352977	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 37
DOC_0352988	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 37
DOC_0352989	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 37
DOC_0352991	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 37
DOC_0352992	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 37
DOC_0352993	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 37
DOC_0352997	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 37
DOC_0353008	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 38
DOC_0353009	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 38
DOC_0353010	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 38
DOC_0353016	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 38
DOC_0353017	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 38
DOC_0353025	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 39
DOC_0353026	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 39
DOC_0353027	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 39

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	Included in Private Plaintiffs' First Supplemental Brief (Dkt. 709)
DOC_0353028	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 39
DOC_0353029	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 39
DOC_0353030	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	Ex. G at 39
DOC_0356616	Representative Brooks Landgraf	PDF		8/22/2021					Legislative	Data relating to draft redistricting legislation for House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 3
DOC_0356617	Representative Brooks Landgraf	PDF		8/22/2020					Legislative	Data relating to draft redistricting legislation for House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 3
DOC_0356620	Representative Brooks Landgraf	PDF	ste955	3/17/2021					Legislative	Data relating to draft redistricting legislation for House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 3
DOC_0356658	Representative Brooks Landgraf	PDF							Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	Ex. G at 41
DOC_0356659	Representative Brooks Landgraf	PDF							Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	Ex. G at 41
DOC_0356660	Representative Brooks Landgraf	PDF							Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	Ex. G at 41
DOC_0356661	Representative Brooks Landgraf	PDF							Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	Ex. G at 41
DOC_0356662	Representative Brooks Landgraf	PDF							Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	Ex. G at 41
DOC_0356664	Representative Brooks Landgraf	PDF							Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	Ex. G at 41
DOC_0356666	Representative Brooks Landgraf	PDF							Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	Ex. G at 41
DOC_0356667	Representative Brooks Landgraf	PDF							Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	Ex. G at 41
DOC_0356670	Representative Brooks Landgraf	PDF							Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	Ex. G at 41
DOC_0356671	Representative Brooks Landgraf	PDF							Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	Ex. G at 41
DOC_0356672	Representative Brooks Landgraf	PDF							Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	Ex. G at 41
DOC_0356673	Representative Brooks Landgraf	PDF							Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	Ex. G at 41
DOC_0356674	Representative Brooks Landgraf	PDF							Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	Ex. G at 41
DOC_0356675	Representative Brooks Landgraf	PDF							Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	Ex. G at 41
DOC_0356676	Representative Brooks Landgraf	PDF							Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	Ex. G at 42
DOC_0356677	Representative Brooks Landgraf	PDF							Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	Ex. G at 42
DOC_0356678	Representative Brooks Landgraf	PDF							Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	Ex. G at 42
DOC_0356679	Representative Brooks Landgraf	PDF							Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	Ex. G at 42

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	Included in Private Plaintiffs' First Supplemental Brief (Dkt. 709)
DOC_0356680	Representative Brooks Landgraf	PDF							Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	Ex. G at 42
DOC_0356681	Representative Brooks Landgraf	PDF							Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	Ex. G at 42
DOC_0356686	Representative Brooks Landgraf	PDF							Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	Ex. G at 42
DOC_0356694	Representative Brooks Landgraf	DOCX							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	Ex. G at 3
DOC_0356695	Representative Brooks Landgraf	XLSX							Legislative	Data relating to draft redistricting legislation for House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 3
DOC_0356697	Representative Brooks Landgraf	XLSX							Legislative	Data relating to draft redistricting legislation for House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 3
DOC_0356699	Representative Brooks Landgraf	PDF	State of Texas	10/4/2021					Legislative	Confidential document relating to draft redistricting legislation for House districts.	Ex. G at 3; Ex. V at 2
DOC_0356705	Representative Brooks Landgraf	DOCX							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	Ex. G at 3
DOC_0356716	Representative Brooks Landgraf	PDF	State of Texas	10/9/2021					Legislative	Confidential document relating to draft redistricting legislation for House districts.	Ex. G at 4; Ex. V at 2
DOC_0356719	Representative Brooks Landgraf	PDF		9/29/2021					Legislative	Data relating to draft redistricting legislation for House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 4
DOC_0356720	Representative Brooks Landgraf	PDF		10/5/2021					Legislative	Data relating to draft redistricting legislation for House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 4
DOC_0356721	Representative Brooks Landgraf	PDF		10/5/2021					Legislative	Data relating to draft redistricting legislation for House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 4
DOC_0356722	Representative Brooks Landgraf	PDF		10/5/2021					Legislative	Data relating to draft redistricting legislation for House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 4
DOC_0356753	Representative Ryan Guillen	JPG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 6
DOC_0356754	Representative Ryan Guillen	PNG	Jonathan Wilson (Rep. Guillen chief of staff)						Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 6
DOC_0356756	Representative Ryan Guillen	XLSX	Jonathan Wilson (Rep. Guillen chief of staff)	8/26/2021					Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 6
DOC_0356757	Representative Ryan Guillen	XLSX		9/15/2021					Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 6
DOC_0356758	Representative Ryan Guillen	PNG	Jonathan Wilson (Rep. Guillen chief of staff)						Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 6
DOC_0356759	Representative Ryan Guillen	PNG	Jonathan Wilson (Rep. Guillen chief of staff)						Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 6
DOC_0356760	Representative Ryan Guillen	PNG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 6
DOC_0356761	Representative Ryan Guillen	XLSX	Jonathan Wilson (Rep. Guillen chief of staff)	8/18/2021					Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 6
DOC_0356762	Representative Ryan Guillen	PDF	Jonathan Wilson (Rep. Guillen chief of staff)	7/27/2021					Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 7

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	Included in Private Plaintiffs' First Supplemental Brief (Dkt. 709)
DOC_0356763	Representative Ryan Guillen	PNG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 7
DOC_0356764	Representative Ryan Guillen	PNG	Jonathan Wilson (Rep. Guillen chief of staff)						Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 7
DOC_0356765	Representative Ryan Guillen	JPG	Jonathan Wilson (Rep. Guillen chief of staff)						Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 7
DOC_0356766	Representative Ryan Guillen	JPG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 7
DOC_0356789	Representative Ryan Guillen	JPG	Jonathan Wilson (Rep. Guillen chief of staff)						Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 7
DOC_0356790	Representative Ryan Guillen	JPG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 7
DOC_0356791	Representative Ryan Guillen	JPG	Jonathan Wilson (Rep. Guillen chief of staff)						Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 7
DOC_0356792	Representative Ryan Guillen	PNG	Jonathan Wilson (Rep. Guillen chief of staff)						Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 7
DOC_0356793	Representative Ryan Guillen	JPG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 7
DOC_0356794	Representative Ryan Guillen	JPG	Jonathan Wilson (Rep. Guillen chief of staff)						Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 7
DOC_0356795	Representative Ryan Guillen		Jonathan Wilson (Rep. Guillen chief of staff)						Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 7
DOC_0356796	Representative Ryan Guillen	JPG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 7
DOC_0356797	Representative Ryan Guillen	JPG	Jonathan Wilson (Rep. Guillen chief of staff)						Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 7
DOC_0356798	Representative Ryan Guillen	JPG	Jonathan Wilson (Rep. Guillen chief of staff)						Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 7
DOC_0356799	Representative Ryan Guillen	JPG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 7
DOC_0356801	Representative Ryan Guillen	JPG	Jonathan Wilson (Rep. Guillen chief of staff)						Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 8
DOC_0356802	Representative Ryan Guillen	JPG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 8
DOC_0356803	Representative Ryan Guillen	JPG	Jonathan Wilson (Rep. Guillen chief of staff)						Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 8
DOC_0356804	Representative Ryan Guillen	JPG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 8

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	Included in Private Plaintiffs' First Supplemental Brief (Dkt. 709)
DOC_0356805	Representative Ryan Guillen	JPG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 8
DOC_0356806	Representative Ryan Guillen	JPG	Jonathan Wilson (Rep. Guillen chief of staff)						Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 8
DOC_0356807	Representative Ryan Guillen	JPG	Jonathan Wilson (Rep. Guillen chief of staff)						Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 8
DOC_0356837	Representative Ryan Guillen	PNG	Jonathan Wilson (Rep. Guillen chief of staff)						Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 8
DOC_0356838	Representative Ryan Guillen	PNG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 8
DOC_0356839	Representative Ryan Guillen	PNG	Jonathan Wilson (Rep. Guillen chief of staff)						Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 8
DOC_0356840	Representative Ryan Guillen	XLSX	Jonathan Wilson (Rep. Guillen chief of staff)	9/11/2021					Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 8
DOC_0356841	Representative Ryan Guillen	PDF		7/30/2021					Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 8
DOC_0356842	Representative Ryan Guillen	PNG	Jonathan Wilson (Rep. Guillen chief of staff)						Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 8
DOC_0356843	Representative Ryan Guillen	PNG	Jonathan Wilson (Rep. Guillen chief of staff)						Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 8
DOC_0356844	Representative Ryan Guillen	PNG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 8
DOC_0356845	Representative Ryan Guillen	XLSX	Jonathan Wilson (Rep. Guillen chief of staff)	8/17/2021					Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 8
DOC_0356846	Representative Ryan Guillen	PNG	Jonathan Wilson (Rep. Guillen chief of staff)						Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 8
DOC_0356847	Representative Ryan Guillen	PNG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 9
DOC_0356848	Representative Ryan Guillen	PNG	Jonathan Wilson (Rep. Guillen chief of staff)						Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 9
DOC_0356849	Representative Ryan Guillen	PNG	Jonathan Wilson (Rep. Guillen chief of staff)						Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 9
DOC_0356850	Representative Ryan Guillen	PNG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 9
DOC_0356851	Representative Ryan Guillen	PNG	Jonathan Wilson (Rep. Guillen chief of staff)						Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 9
DOC_0356852	Representative Ryan Guillen	JPG	Jonathan Wilson (Rep. Guillen chief of staff)						Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 9

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	Included in Private Plaintiffs' First Supplemental Brief (Dkt. 709)
DOC_0356853	Representative Ryan Guillen	JPG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 9
DOC_0356854	Representative Ryan Guillen	JPG	Jonathan Wilson (Rep. Guillen chief of staff)						Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 9
DOC_0356855	Representative Ryan Guillen	JPG	Jonathan Wilson (Rep. Guillen chief of staff)						Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 9
DOC_0356856	Representative Ryan Guillen	PDF		9/29/2021					Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 9
DOC_0356857	Representative Ryan Guillen	XLSX	Jonathan Wilson (Rep. Guillen chief of staff)	8/17/2021					Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 9
DOC_0356858	Representative Ryan Guillen	PNG	Jonathan Wilson (Rep. Guillen chief of staff)						Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 9
DOC_0356859	Representative Ryan Guillen	PNG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 9
DOC_0356860	Representative Ryan Guillen	XLSX	Jonathan Wilson (Rep. Guillen chief of staff)	9/21/2021					Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 9
DOC_0356861	Representative Ryan Guillen	XLSX	Jonathan Wilson (Rep. Guillen chief of staff)	8/22/2021					Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 9
PDOC_001768	Representative Todd Hunter								Legislative; Attorney Client	Confidential invoices, identifying privileged work performed at the direction of legislative members or at the direction of counsel, for legal services rendered in connection with redistricting legislation.	Ex. G at 47
PDOC_001774	Representative Todd Hunter"								Legislative; Attorney Client	Confidential invoices, identifying privileged work performed at the direction of legislative members or at the direction of counsel, for legal services rendered in connection with redistricting legislation.	Ex. G at 47
PDOC_001812	Representative Todd Hunter								Legislative; Attorney Client	Confidential invoices, identifying privileged work performed at the direction of legislative members or at the direction of counsel, for legal services rendered in connection with redistricting legislation.	Ex. G at 47
PDOC_001883	Representative Todd Hunter								Legislative; Attorney Client	Confidential invoices, identifying privileged work performed at the direction of legislative members or at the direction of counsel, for legal services rendered in connection with redistricting legislation.	Ex. G at 47
PDOC_001890	Representative Todd Hunter								Legislative; Attorney Client	Confidential invoices, identifying privileged work performed at the direction of legislative members or at the direction of counsel, for legal services rendered in connection with redistricting legislation.	Ex. G at 47
PDOC_001896	Representative Todd Hunter								Legislative; Attorney Client	Confidential invoices, identifying privileged work performed at the direction of legislative members or at the direction of counsel, for legal services rendered in connection with redistricting legislation.	Ex. G at 48
PDOC_001901	Representative Todd Hunter								Legislative; Attorney Client	Confidential invoices, identifying privileged work performed at the direction of legislative members or at the direction of counsel, for legal services rendered in connection with redistricting legislation.	Ex. G at 48
PDOC_001924	Representative Todd Hunter								Legislative; Attorney Client	Confidential invoices, identifying privileged work performed at the direction of legislative members or at the direction of counsel, for legal services rendered in connection with redistricting legislation.	Ex. G at 48
PDOC_001929	Representative Todd Hunter								Legislative; Attorney Client	Confidential invoices, identifying privileged work performed at the direction of legislative members or at the direction of counsel, for legal services rendered in connection with redistricting legislation.	Ex. G at 48
PDOC_001936	Representative Todd Hunter								Legislative; Attorney Client	Confidential invoices, identifying privileged work performed at the direction of legislative members or at the direction of counsel, for legal services rendered in connection with redistricting legislation.	Ex. G at 48

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	Included in Private Plaintiffs' First Supplemental Brief (Dkt. 709)
PDOC_001960	Representative Todd Hunter								Legislative; Attorney Client	Confidential invoices, identifying privileged work performed at the direction of legislative members or at the direction of counsel, for legal services rendered in connection with redistricting legislation.	Ex. G at 48
PDOC_001968	Representative Todd Hunter								Legislative; Attorney Client	Confidential invoices, identifying privileged work performed at the direction of legislative members or at the direction of counsel, for legal services rendered in connection with redistricting legislation.	Ex. G at 48
PDOC_001986	Representative Todd Hunter								Legislative; Attorney Client	Confidential invoices, identifying privileged work performed at the direction of legislative members or at the direction of counsel, for legal services rendered in connection with redistricting legislation.	Ex. G at 48
PDOC_001997	Representative Todd Hunter								Legislative; Attorney Client	Confidential invoices, identifying privileged work performed at the direction of legislative members or at the direction of counsel, for legal services rendered in connection with redistricting legislation.	Ex. G at 48
PDOC_002955	Lieutenant Governor Dan Patrick								Legislative	Confidential draft maps and data relating to draft redistricting legislation for congressional districts, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	Ex. C at 90; Ex. G at 3; Ex. Q at 90
PDOC_002956	Lieutenant Governor Dan Patrick								Legislative	Confidential draft maps and data relating to draft redistricting legislation for congressional districts, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	Ex. C at 90; Ex. G at 3; Ex. Q at 90
PDOC_004650	Representative Brooks Landgraf								Legislative	Data and related materials relating to draft redistricting legislation for House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 4

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	Included in Private Plaintiffs' First Supplemental Brief (Dkt. 709)
DOC_0012133	Lieutenant Governor Dan Patrick	PDF	Alexandra Lovell (Lt. Gov. Digital Director)	1/29/2021					Legislative	Document on strategy for news and social media and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	Ex. C at 86; Ex. Q at 86
DOC_0012134	Lieutenant Governor Dan Patrick	PDF	Alexandra Lovell (Lt. Gov. Digital Director)	2/5/2021					Legislative	Document on strategy for news and social media and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	Ex. C at 86; Ex. Q at 86
DOC_0012135	Lieutenant Governor Dan Patrick	PDF	Alexandra Lovell (Lt. Gov. Digital Director)	2/19/2021					Legislative	Document on strategy for news and social media and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	Ex. C at 86; Ex. Q at 86
DOC_0012136	Lieutenant Governor Dan Patrick	PDF	Alexandra Lovell (Lt. Gov. Digital Director)	2/19/2021					Legislative	Document on strategy for news and social media and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	Ex. C at 86; Ex. Q at 86
DOC_0012137	Lieutenant Governor Dan Patrick	PDF	Alexandra Lovell (Lt. Gov. Digital Director)	2/25/2021					Legislative	Document on strategy for news and social media and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	Ex. C at 86; Ex. Q at 86
DOC_0012138	Lieutenant Governor Dan Patrick	PDF	Alexandra Lovell (Lt. Gov. Digital Director)	3/8/2021					Legislative	Document on strategy for news and social media and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	Ex. C at 86; Ex. Q at 86
DOC_0012139	Lieutenant Governor Dan Patrick	PDF	Alexandra Lovell (Lt. Gov. Digital Director)	3/11/2021					Legislative	Document on strategy for news and social media and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	Ex. C at 86; Ex. Q at 86
DOC_0012140	Lieutenant Governor Dan Patrick	DOTX	Alexandra Lovell (Lt. Gov. Digital Director)	3/25/2021					Legislative	Document on strategy for news and social media and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	Ex. C at 86; Ex. Q at 86
DOC_0012141	Lieutenant Governor Dan Patrick	PDF	Alexandra Lovell (Lt. Gov. Digital Director)	3/25/2021					Legislative	Document on strategy for news and social media and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	Ex. C at 86; Ex. Q at 86
DOC_0012142	Lieutenant Governor Dan Patrick	PDF	Alexandra Lovell (Lt. Gov. Digital Director)	3/25/2021					Legislative	Document on strategy for news and social media and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	Ex. C at 86; Ex. Q at 86
DOC_0012143	Lieutenant Governor Dan Patrick	DOTX	Alexandra Lovell (Lt. Gov. Digital Director)	3/30/2021					Legislative	Document on strategy for news and social media and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	Ex. C at 86; Ex. Q at 86
DOC_0012144	Lieutenant Governor Dan Patrick	PDF	Alexandra Lovell (Lt. Gov. Digital Director)	3/31/2021					Legislative	Document on strategy for news and social media and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	Ex. C at 87; Ex. Q at 87
DOC_0012145	Lieutenant Governor Dan Patrick	DOTX	Alexandra Lovell (Lt. Gov. Digital Director)	4/12/2021					Legislative	Document on strategy for news and social media and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	Ex. C at 87; Ex. Q at 87
DOC_0012146	Lieutenant Governor Dan Patrick	PDF	Microsoft Office User	5/13/2021					Legislative	Document on strategy for news and social media and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	Ex. C at 87; Ex. Q at 87
DOC_0012147	Lieutenant Governor Dan Patrick	DOCX	Microsoft Office User	4/20/2021					Legislative	Document on strategy for news and social media and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	Ex. C at 87; Ex. Q at 87

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	Included in Private Plaintiffs' First Supplemental Brief (Dkt. 709)
DOC_0012148	Lieutenant Governor Dan Patrick	PDF	Microsoft Office User	4/19/2021					Legislative	Document on strategy for news and social media and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	Ex. C at 87; Ex. Q at 87
DOC_0012149	Lieutenant Governor Dan Patrick	PDF	Microsoft Office User	4/29/2021					Legislative	Document on strategy for news and social media and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	Ex. C at 87; Ex. Q at 87
DOC_0012152	Lieutenant Governor Dan Patrick	DOCX	Alexandra Lovell (Lt. Gov. Digital Director)	10/21/2019					Legislative	Document on strategy for news and social media and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	Ex. C at 87; Ex. Q at 87
DOC_0012163	Lieutenant Governor Dan Patrick	PDF		5/26/2017					Legislative	Document on strategy for news and social media and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	
DOC_0012239	Lieutenant Governor Dan Patrick	PDF		4/13/2021					Legislative; Attorney Client; Work Product	Confidential retention letter from outside attorneys to Lieutenant Governor Patrick for services in connection with considering redistricting legislation.	Ex. C at 87; Ex. G at 47; Ex. Q at 87
DOC_0012240	Lieutenant Governor Dan Patrick	DOCX	Scott Keller (attorney)	3/26/2021					Legislative; Attorney Client; Work Product	Confidential retention letter from outside attorneys to Lieutenant Governor Patrick for services in connection with considering redistricting legislation.	Ex. C at 87; Ex. G at 47; Ex. Q at 87
DOC_0012241	Lieutenant Governor Dan Patrick	DOCX	Scott Keller (attorney)	3/26/2021					Legislative; Attorney Client; Work Product	Confidential retention letter from outside attorneys to Lieutenant Governor Patrick for services in connection with considering redistricting legislation.	Ex. C at 87; Ex. G at 47; Ex. Q at 87
DOC_0012244	Lieutenant Governor Dan Patrick	DOCX	Steven Aranyi	10/8/2021					Legislative	Confidential retention letter from outside attorneys to Lieutenant Governor Patrick for services in connection with considering redistricting legislation.	Ex. C at 87; Ex. G at 47; Ex. Q at 87
DOC_0012277	Lieutenant Governor Dan Patrick	PDF	James Whitehome	4/1/2021					Legislative	Attachment to confidential communication between Lieutenant Governor Patrick staffers regarding redistricting data, made for a legislative purpose and reflecting privileged information, including thoughts, opinions, and mental impressions.	Ex. C at 88; Ex. Q at 88; Ex. V at 2
DOC_0012398	Lieutenant Governor Dan Patrick	MSG		10/11/2021	Jeff Archer (TLC Executive Director)	Darrell Davila (Lt. Gov. Chief of Staff)	Sean Opperman (attorney); Anna Mackin (attorney); Chris Sterner (attorney); Alix Morris (attorney)		Legislative	Confidential communication between Lieutenant Governor Patrick staff and TLC regarding invoice for legal services provided in connection with redistricting litigation.	Ex. C at 88; Ex. Q at 88; Ex. G at 47
DOC_0012399	Lieutenant Governor Dan Patrick	PDF		10/7/2021					Legislative	Attached invoice to confidential communication between Lieutenant Governor Patrick staff and TLC regarding invoice for legal services provided in connection with redistricting litigation.	Ex. C at 88; Ex. G at 47; Ex. Q at 88
DOC_0012419	Lieutenant Governor Dan Patrick	MSG		3/11/2021	Chris Sterner (attorney) (Lt. Gov. General Counsel)	Jeff Archer (TLC Executive Director)			Legislative	Attached invoice to confidential communication between Lieutenant Governor Patrick staff and TLC regarding invoice for legal services provided in connection with redistricting litigation.	Ex. C at 88; Ex. G at 47; Ex. Q at 88
DOC_0012420	Lieutenant Governor Dan Patrick	DOCX	ATC	3/11/2021					Legislative	Attached invoice to confidential communication between Lieutenant Governor Patrick staff and TLC regarding invoice for legal services provided in connection with redistricting litigation.	Ex. C at 88; Ex. G at 47; Ex. Q at 88
DOC_0012507	Lieutenant Governor Dan Patrick	PNG			Darrell Davila (Lt. Gov. Chief of Staff)	Scott Keller (attorney)			Attorney Client; Work Product	Confidential communication between Darrell Davila and attorney, made for the purpose of facilitating the rendition of legal advice in connection with redistricting legislation.	
DOC_0012508	Lieutenant Governor Dan Patrick	PNG			Darrell Davila (Lt. Gov. Chief of Staff)	Scott Keller (attorney)			Attorney Client; Work Product	Confidential communication between Darrell Davila and attorney, made for the purpose of facilitating the rendition of legal advice in connection with redistricting legislation.	
DOC_0012509	Lieutenant Governor Dan Patrick	PNG			Darrell Davila (Lt. Gov. Chief of Staff)	Scott Keller (attorney)			Attorney Client; Work Product	Confidential communication between Darrell Davila and attorney, made for the purpose of facilitating the rendition of legal advice in connection with redistricting legislation.	
DOC_0012510	Lieutenant Governor Dan Patrick	PNG			Darrell Davila (Lt. Gov. Chief of Staff)	Scott Keller (attorney)			Attorney Client; Work Product	Confidential communication between Darrell Davila and attorney, made for the purpose of facilitating the rendition of legal advice in connection with redistricting legislation.	
DOC_0012511	Lieutenant Governor Dan Patrick	PNG			Darrell Davila (Lt. Gov. Chief of Staff)	Scott Keller (attorney)			Attorney Client; Work Product	Confidential communication between Darrell Davila and attorney, made for the purpose of facilitating the rendition of legal advice in connection with redistricting legislation.	
DOC_0012512	Lieutenant Governor Dan Patrick	PNG			Darrell Davila (Lt. Gov. Chief of Staff)	Scott Keller (attorney)			Attorney Client; Work Product	Confidential communication between Darrell Davila and attorney, made for the purpose of facilitating the rendition of legal advice in connection with redistricting legislation.	
DOC_0012513	Lieutenant Governor Dan Patrick	PNG			Darrell Davila (Lt. Gov. Chief of Staff)	Scott Keller (attorney)			Attorney Client; Work Product	Confidential communication between Darrell Davila and attorney, made for the purpose of facilitating the rendition of legal advice in connection with redistricting legislation.	

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	Included in Private Plaintiffs' First Supplemental Brief (Dkt. 709)
DOC_0012514	Lieutenant Governor Dan Patrick	PNG			Darrell Davila (Lt. Gov. Chief of Staff)	Scott Keller (attorney)			Attorney Client; Work Product	Confidential communication between Darrell Davila and attorney, made for the purpose of facilitating the rendition of legal advice in connection with redistricting legislation.	
DOC_0012515	Lieutenant Governor Dan Patrick	PNG			Darrell Davila (Lt. Gov. Chief of Staff)	Scott Keller (attorney)			Attorney Client; Work Product	Confidential communication between Darrell Davila and attorney, made for the purpose of facilitating the rendition of legal advice in connection with redistricting legislation.	
DOC_0012516	Lieutenant Governor Dan Patrick	PNG			Darrell Davila (Lt. Gov. Chief of Staff)	Scott Keller (attorney)			Attorney Client; Work Product	Confidential communication between Darrell Davila and attorney, made for the purpose of facilitating the rendition of legal advice in connection with redistricting legislation.	
DOC_0012517	Lieutenant Governor Dan Patrick	PNG			Darrell Davila (Lt. Gov. Chief of Staff)	Scott Keller (attorney)			Attorney Client; Work Product	Confidential communication between Darrell Davila and attorney, made for the purpose of facilitating the rendition of legal advice in connection with redistricting legislation.	
DOC_0012522	Lieutenant Governor Dan Patrick	JPG			Darrell Davila (Lt. Gov. Chief of Staff)	Luis Saenz (Gov. Abbott Chief of Staff)			Legislative	Confidential communication between Darrell Davila and Luis Saenz regarding redistricting, reflecting legislative thoughts, opinions, and mental impressions.	Ex. V at 2
DOC_0012554	Lieutenant Governor Dan Patrick	JPG			Darrell Davila (Lt. Gov. Chief of Staff)	Alix Morris (attorney) (Lt. Gov. Deputy General Counsel)			Legislative; Attorney Client; Work Product	Confidential communication between Lieutenant Governor Patrick and/or his staff made for a legislative purpose and reflecting privileged information, including thoughts, opinions, and mental impressions. Additionally, the document reflects confidential legal advice provided by counsel and the thoughts and mental impressions of counsel.	Ex. C at 89; Ex. Q at 89
PDOC_002935	Lieutenant Governor Dan Patrick								Legislative	Confidential communication between Lieutenant Governor Patrick and other legislators regarding draft redistricting legislation, made for a legislative purpose and reflecting privileged information, including thoughts, opinions, and mental impressions.	Ex. C at 89; Ex. Q at 89
PDOC_002955	Lieutenant Governor Dan Patrick								Legislative	Confidential draft maps and data relating to draft redistricting legislation for congressional districts, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	Ex. C at 90; Ex. G at 3; Ex. Q at 90
PDOC_002956	Lieutenant Governor Dan Patrick								Legislative	Confidential draft maps and data relating to draft redistricting legislation for congressional districts, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	Ex. C at 90; Ex. G at 3; Ex. Q at 90

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	Included in Private Plaintiffs' First Supplemental Brief (Dkt. 709)
DOC_0000001	Anna Mackin	PDF		11/16/2021					Legislative	Compilation of confidential emails exchanged between Ms. Mackin and various members of the Texas Legislature regarding the creation and design of the new electoral maps, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	
DOC_0000095	Anna Mackin	PDF	Kenneth Bryan (Senate Research Center)	2/22/2021					Legislative; Attorney Client; Work Product	Confidential Senate Research Center analysis of Senate Redistricting Committee hearing, sent to committee members, and kept in Senator Huffman's personal files for the purpose of considering redistricting legislation.	
DOC_0000096	Anna Mackin	PDF	Kenneth Bryan (Senate Research Center)	3/11/2021					Legislative; Attorney Client; Work Product	Confidential Senate Research Center analysis of Senate Redistricting Committee hearing, sent to committee members, and kept in Senator Huffman's personal files for the purpose of considering redistricting legislation.	
DOC_0000097	Anna Mackin	PDF	Kenneth Bryan (Senate Research Center)	3/15/2021					Legislative; Attorney Client; Work Product	Confidential Senate Research Center analysis of Senate Redistricting Committee hearing, sent to committee members, and kept in Senator Huffman's personal files for the purpose of considering redistricting legislation.	
DOC_0000098	Anna Mackin	PDF	Andrew Robison (Senate Research Center)	3/16/2021					Legislative; Attorney Client; Work Product	Confidential Senate Research Center analysis of Senate Redistricting Committee hearing, sent to committee members, and kept in Senator Huffman's personal files for the purpose of considering redistricting legislation.	
DOC_0000175	Anna Mackin	PDF	Aleihie Lila Valencia (Texas Demographic Center)	2/5/2021					Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	Ex. V at 11
DOC_0000195	Anna Mackin	PDF		8/5/2021					Legislative	Confidential invoice for legal services provided in connection with redistricting legislation, given to Senate Redistricting Committee Staff.	Ex. G at 165
DOC_0000213	Anna Mackin	PDF		4/13/2021					Legislative; Attorney Client; Work Product	Confidential retention letter from Lebotsky Keller to Lieutenant Governor Patrick and Senator Huffman, setting forth scope of representation and describing related redistricting legal issues, made for the purpose of facilitating the rendition of legal advice regarding redistricting litigation. The retention of Lebotsky Kelly and the firm's scope of work also reveals mental impressions on legislative process and policy.	Ex. G at 165
DOC_0000344	Anna Mackin	DOCX	Wroe Jackson (Senator Huffman general counsel)	7/16/2021					Legislative; Attorney Client; Work Product	Draft schedule for the redistricting process, prepared for Senator Huffman by Anna Mackin (attorney), reflecting and implicating legislative privileged thoughts, opinions, and mental impressions, as well as attorney advice and mental impressions.	Ex. V at 11
DOC_0000345	Anna Mackin	DOCX	Wroe Jackson (Senator Huffman general counsel)	7/19/2021					Legislative; Attorney Client; Work Product	Draft schedule for the redistricting process, prepared for Senator Huffman by Anna Mackin (attorney), reflecting and implicating legislative privileged thoughts, opinions, and mental impressions, as well as attorney advice and mental impressions.	Ex. V at 11
DOC_0000346	Anna Mackin	DOCX	Wroe Jackson (Senator Huffman general counsel)	7/21/2021					Legislative; Attorney Client; Work Product	Draft schedule for the redistricting process, prepared for Senator Huffman by Anna Mackin (attorney), reflecting and implicating legislative privileged thoughts, opinions, and mental impressions, as well as attorney advice and mental impressions.	Ex. V at 11
DOC_0000349	Anna Mackin	DOCX	Wroe Jackson (Senator Huffman general counsel)	5/7/2021					Legislative; Attorney Client; Work Product	Draft schedule for the redistricting process, prepared for Senator Huffman by Anna Mackin (attorney), reflecting and implicating legislative privileged thoughts, opinions, and mental impressions, as well as attorney advice and mental impressions.	Ex. V at 11
DOC_0000350	Anna Mackin	DOCX	Wroe Jackson (Senator Huffman general counsel)	7/16/2021					Legislative; Attorney Client; Work Product	Draft schedule for the redistricting process, prepared for Senator Huffman by Anna Mackin (attorney), reflecting and implicating legislative privileged thoughts, opinions, and mental impressions, as well as attorney advice and mental impressions.	Ex. V at 11

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	Included in Private Plaintiffs' First Supplemental Brief (Dkt. 709)
DOC_0000353	Anna Mackin	DOCX	Anna Mackin (attorney)	1/29/2021					Legislative Attorney client; work product	Draft schedule for the redistricting process, prepared for Senator Huffman by Anna Mackin (attorney), reflecting and implicating legislative privileged thoughts, opinions, and mental impressions, as well as attorney advice and mental impressions.	
DOC_0000372	Anna Mackin	MSG		1/9/2021	Sean Opperman (attorney)	Jeff Archer (TLC)	Anna Mackin (attorney); Karina Davis		Legislative Attorney client; work product	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	
DOC_0000974	Anna Mackin	DOCX	Sean Opperman (attorney)	1/17/2021					Legislative; Attorney Client; Work Product	Attachment to confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	
DOC_0000975	Anna Mackin	MSG		1/17/2021	Anna Mackin (attorney)	Sean Opperman (attorney)			Legislative; Attorney Client; Work Product	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	
DOC_0001173	Anna Mackin	MSG		4/13/2021	Scott Keller (attorney)	Darrel Davila	Chris Sterner (attorney); Alix Morris (Attorney); Sean Opperman (attorney); Anna Mackin (attorney); Todd Disher		Legislative; Attorney Client; Work Product	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	Ex. V at 11
DOC_0001204	Anna Mackin	MSG		3/27/2021	Aaron Harris; Alexander Hammond; Angus Lupton; Anna Barnett; Anna Mackin (attorney); Britton Davis; Caitly Jackson; Carrie Smith; Cody Terry; Deisy Jaimes; Doug Clements; Drew Tedford; Grecia Galvan; Jason Kirksey; Kenneth Bryan; Koy Kunkel; Lara Wendler; Lauren Cacheaux; Luis Moreno; Marc Salvato; Mathew Dowling; Paul Emerson; Pearl Cruz; Randy Samuelson; Ruben O'Bell; Rudy England; Ryan Alter; Shelby Corine; Stacey Chamberlin; sushma Smith; Tomas Larraide; Tony Wen	Sean Opperman (Attorney)			Legislative; Attorney Client Work Product	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	
DOC_0001244	Anna Mackin	MSG		7/29/2021	Aaron Harris; Alexander Hammond; Angus Lupton; Anna Barnett; Anna Mackin (attorney); Britton Davis; Caitly Jackson; Carrie Smith; Cody Terry; Deisy Jaimes; Doug Clements; Drew Tedford; Grecia Galvan; Jason Kirksey; Kenneth Bryan; Koy Kunkel; Lara Wendler; Lauren Cacheaux; Luis Moreno; Marc Salvato; Mathew Dowling; Paul Emerson; Pearl Cruz; Randy Samuelson; Ruben O'Bell; Rudy England; Ryan Alter; Shelby Corine; Stacey Chamberlin; sushma Smith; Tomas Larraide; Tony Wen	Sean Opperman (Attorney)			Legislative; Attorney Client; Work Product	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	

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DOC_0001517	Anna Mackin	PDF		8/5/2021					Legislative	Confidential invoice for legal services provided in connection with redistricting legislation, given to Senate Redistricting Committee Staff.	Ex. G at 165
DOC_0002307	Senator Joan Huffman	XLSX	Kurt Gore	12/15/2020					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 15
DOC_0002351	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	2/28/2020					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	Ex. G at 15
DOC_0002362	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/18/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	Ex. G at 16
DOC_0002363	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/7/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	Ex. G at 16
DOC_0002367	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/7/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	Ex. G at 16
DOC_0002374	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/18/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	Ex. G at 16
DOC_0002381	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/26/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	Ex. G at 16
DOC_0002390	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/27/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	Ex. G at 16
DOC_0002391	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/27/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	Ex. G at 16
DOC_0002399	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/28/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	Ex. G at 16
DOC_0002400	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/22/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	Ex. G at 16
DOC_0002405	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	2/12/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	Ex. G at 16
DOC_0002406	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	2/10/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	Ex. G at 16
DOC_0002407	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/22/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	Ex. G at 16
DOC_0002415	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/22/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	Ex. G at 16
DOC_0002420	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	2/1/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	Ex. G at 16
DOC_0002421	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	2/1/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	Ex. G at 16
DOC_0002426	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	2/2/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	Ex. G at 16
DOC_0002427	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/22/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	Ex. G at 17
DOC_0002436	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	2/2/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	Ex. G at 17
DOC_0002437	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/22/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	Ex. G at 17
DOC_0002445	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	2/12/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	Ex. G at 17
DOC_0002446	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/22/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	Ex. G at 17
DOC_0002454	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	2/12/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	Ex. G at 17

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	Included in Private Plaintiffs' First Supplemental Brief (Dkt. 709)
DOC_0002455	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/22/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	Ex. G at 17
DOC_0002462	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	2/12/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	Ex. G at 17
DOC_0002463	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/22/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	Ex. G at 17
DOC_0002466	Senator Joan Huffman	DOCX	Anna Mackin(attorney)	3/13/2021					Legislative; Attorney Client; Work Product	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, including input from attorneys relating to proposed redistricting legislation.	Ex. G at 17
DOC_0002481	Senator Joan Huffman	PDF		12/30/2019					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, including input from attorneys relating to proposed redistricting legislation.	Ex. G at 17
DOC_0002483	Senator Joan Huffman	PDF		12/31/2019					Legislative; Attorney Client; Work Product	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, including input from attorneys relating to proposed redistricting legislation.	Ex. G at 18
DOC_0002487	Senator Joan Huffman	PDF		5/15/2020					Legislative; Attorney Client; Work Product	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, including input from attorneys relating to proposed redistricting legislation.	Ex. G at 18
DOC_0002488	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	10/7/2019					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	Ex. G at 18
DOC_0002514	Senator Joan Huffman	XLSX	Sean Opperman (attorney)	1/24/2020					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	Ex. G at 18
DOC_0002516	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/6/2020					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	Ex. G at 18
DOC_0002558	Senator Joan Huffman	XLSX	Sean opperman (attorney)	3/29/2019					Legislative; Attorney Client	Confidential invoice relating to expert services, sought for the purpose of providing expert consultation to aid in drafting and considering redistricting legislation.	Ex. G at 49
DOC_0002559	Senator Joan Huffman	PDF		4/13/2021					Legislative; Attorney Client; Work Product	Confidential contract for the retention of outside legal counsel, sought for the purpose of receiving legal advice in connection with redistricting legislation.	Ex. G at 49
DOC_0002560	Senator Joan Huffman	PDF		4/13/2021					Legislative; Attorney Client; Work Product	Confidential contract for the retention of outside legal counsel, sought for the purpose of receiving legal advice in connection with redistricting legislation.	Ex. G at 49
DOC_0002562	Senator Joan Huffman	PDF		7/22/2021					Legislative; Attorney Client; Work Product	Confidential invoice relating to outside legal counsel, sought for the purpose of receiving legal advice in connection with redistricting legislation.	Ex. G at 49
DOC_0002565	Senator Joan Huffman	PDF		8/5/2021					Legislative; Attorney Client; Work Product	Confidential invoice relating to outside legal counsel, sought for the purpose of receiving legal advice in connection with redistricting legislation.	Ex. G at 49
DOC_0002566	Senator Joan Huffman	PDF		6/8/2021					Legislative; Attorney Client; Work Product	Confidential invoice relating to outside legal counsel, sought for the purpose of receiving legal advice in connection with redistricting legislation.	Ex. G at 49
DOC_0002568	Senator Joan Huffman	PDF		8/5/2021					Legislative; Attorney Client; Work Product	Confidential invoice relating to outside legal counsel, sought for the purpose of receiving legal advice in connection with redistricting legislation.	Ex. G at 49
DOC_0002577	Senator Joan Huffman	PDF	JSA	3/26/2021					Legislative; Attorney Client; Work Product	Confidential memorandum from Texas Legislative Council to members of the legislature relating to redistricting materials.	Ex. G at 19; Ex. V at 3
DOC_0002578	Senator Joan Huffman	PDF	JSA	3/26/2021					Legislative; Attorney Client; Work Product	Confidential memorandum from Texas Legislative Council to members of the legislature relating to redistricting materials.	Ex. G at 19; Ex. V at 3
DOC_0002692	Senator Joan Huffman	PDF		10/3/2019					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 21
DOC_0002693	Senator Joan Huffman	PDF		9/30/2019					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 21
DOC_0002694	Senator Joan Huffman	PDF		10/2/2019					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 21

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	Included in Private Plaintiffs' First Supplemental Brief (Dkt. 709)
DOC_0002695	Senator Joan Huffman	PDF		10/1/2019					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 21
DOC_0002700	Senator Joan Huffman	XLSX	KAG	2/20/2015					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 21; Ex. V at 3
DOC_0006826	Senator Joan Huffman	PDF		10/19/2021					Legislative	Data relating to draft redistricting legislation for state board of education districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 23
DOC_0006828	Senator Joan Huffman	PDF		10/21/2021					Legislative	Data relating to draft redistricting legislation for state board of education districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 23
DOC_0007006	Senator Joan Huffman	PDF		12/31/2019					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 27
DOC_0007007	Senator Joan Huffman	PDF	o0600f0	1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 27; Ex. V at 6
DOC_0007008	Senator Joan Huffman	XLSX	KAG	2/20/2015					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 27; Ex. V at 6
DOC_0007010	Senator Joan Huffman	PDF		12/30/2019					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 27
DOC_0007073	Senator Joan Huffman	PDF		1/18/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 30
DOC_0007074	Senator Joan Huffman	PDF		1/18/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 30
DOC_0007075	Senator Joan Huffman	PDF		1/10/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 30
DOC_0007076	Senator Joan Huffman	PDF		1/10/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 30
DOC_0012133	Lieutenant Governor Dan Patrick	PDF	Alexandra Lovell (Lt. Gov. Digital Director)	1/29/2021					Legislative	Document on strategy for news and social media and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	Ex. C at 86; Ex. Q at 86
DOC_0012134	Lieutenant Governor Dan Patrick	PDF	Alexandra Lovell (Lt. Gov. Digital Director)	2/5/2021					Legislative	Document on strategy for news and social media and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	Ex. C at 86; Ex. Q at 86
DOC_0012135	Lieutenant Governor Dan Patrick	PDF	Alexandra Lovell (Lt. Gov. Digital Director)	2/19/2021					Legislative	Document on strategy for news and social media and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	Ex. C at 86; Ex. Q at 86
DOC_0012136	Lieutenant Governor Dan Patrick	PDF	Alexandra Lovell (Lt. Gov. Digital Director)	2/19/2021					Legislative	Document on strategy for news and social media and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	Ex. C at 86; Ex. Q at 86
DOC_0012137	Lieutenant Governor Dan Patrick	PDF	Alexandra Lovell (Lt. Gov. Digital Director)	2/25/2021					Legislative	Document on strategy for news and social media and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	Ex. C at 86; Ex. Q at 86
DOC_0012138	Lieutenant Governor Dan Patrick	PDF	Alexandra Lovell (Lt. Gov. Digital Director)	3/8/2021					Legislative	Document on strategy for news and social media and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	Ex. C at 86; Ex. Q at 86

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	Included in Private Plaintiffs' First Supplemental Brief (Dkt. 709)
DOC_0012139	Lieutenant Governor Dan Patrick	PDF	Alexandra Lovell (Lt. Gov. Digital Director)	3/11/2021					Legislative	Document on strategy for news and social media and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	Ex. C at 86; Ex. Q at 86
DOC_0012140	Lieutenant Governor Dan Patrick	DOTX	Alexandra Lovell (Lt. Gov. Digital Director)	3/25/2021					Legislative	Document on strategy for news and social media and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	Ex. C at 86; Ex. Q at 86
DOC_0012141	Lieutenant Governor Dan Patrick	PDF	Alexandra Lovell (Lt. Gov. Digital Director)	3/25/2021					Legislative	Document on strategy for news and social media and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	Ex. C at 86; Ex. Q at 86
DOC_0012142	Lieutenant Governor Dan Patrick	PDF	Alexandra Lovell (Lt. Gov. Digital Director)	3/25/2021					Legislative	Document on strategy for news and social media and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	Ex. C at 86; Ex. Q at 86
DOC_0012143	Lieutenant Governor Dan Patrick	DOTX	Alexandra Lovell (Lt. Gov. Digital Director)	3/30/2021					Legislative	Document on strategy for news and social media and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	Ex. C at 86; Ex. Q at 86
DOC_0012144	Lieutenant Governor Dan Patrick	PDF	Alexandra Lovell (Lt. Gov. Digital Director)	3/31/2021					Legislative	Document on strategy for news and social media and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	Ex. C at 87; Ex. Q at 87
DOC_0012145	Lieutenant Governor Dan Patrick	DOTX	Alexandra Lovell (Lt. Gov. Digital Director)	4/12/2021					Legislative	Document on strategy for news and social media and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	Ex. C at 87; Ex. Q at 87
DOC_0012146	Lieutenant Governor Dan Patrick	PDF	Microsoft Office User	5/13/2021					Legislative	Document on strategy for news and social media and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	Ex. C at 87; Ex. Q at 87
DOC_0012147	Lieutenant Governor Dan Patrick	DOCX	Microsoft Office User	4/20/2021					Legislative	Document on strategy for news and social media and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	Ex. C at 87; Ex. Q at 87
DOC_0012148	Lieutenant Governor Dan Patrick	PDF	Microsoft Office User	4/19/2021					Legislative	Document on strategy for news and social media and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	Ex. C at 87; Ex. Q at 87
DOC_0012149	Lieutenant Governor Dan Patrick	PDF	Microsoft Office User	4/29/2021					Legislative	Document on strategy for news and social media and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	Ex. C at 87; Ex. Q at 87
DOC_0012152	Lieutenant Governor Dan Patrick	DOCX	Alexandra Lovell (Lt. Gov. Digital Director)	10/21/2019					Legislative	Document on strategy for news and social media and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	Ex. C at 87; Ex. Q at 87

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	Included in Private Plaintiffs' First Supplemental Brief (Dkt. 709)
DOC_0012163	Lieutenant Governor Dan Patrick	PDF		5/26/2017					Legislative	Document on strategy for news and social media and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	
DOC_0012239	Lieutenant Governor Dan Patrick	PDF		4/13/2021					Legislative; Attorney Client; Work Product	Confidential retention letter from outside attorneys to Lieutenant Governor Patrick for services in connection with considering redistricting legislation.	Ex. C at 87; Ex. G at 47; Ex. Q at 87
DOC_0012240	Lieutenant Governor Dan Patrick	DOCX	Scott Keller (attorney)	3/26/2021					Legislative; Attorney Client; Work Product	Confidential retention letter from outside attorneys to Lieutenant Governor Patrick for services in connection with considering redistricting legislation.	Ex. C at 87; Ex. G at 47; Ex. Q at 87
DOC_0012241	Lieutenant Governor Dan Patrick	DOCX	Scott Keller (attorney)	3/26/2021					Legislative; Attorney Client; Work Product	Confidential retention letter from outside attorneys to Lieutenant Governor Patrick for services in connection with considering redistricting legislation.	Ex. C at 87; Ex. G at 47; Ex. Q at 87
DOC_0012277	Lieutenant Governor Dan Patrick	PDF	James Whitehorne	4/1/2021					Legislative	Attachment to confidential communication between Lieutenant Governor Patrick staffers regarding redistricting data, made for a legislative purpose and reflecting privileged information, including thoughts, opinions, and mental impressions.	Ex. C at 88; Ex. Q at 88; Ex. V at 2
DOC_0012419	Lieutenant Governor Dan Patrick	MSG		3/11/2021	Chris Sterner (attorney) (Lt. Gov. General Counsel)	Jeff Archer (TLC Executive Director)			Legislative	Attached invoice to confidential communication between Lieutenant Governor Patrick staff and TLC regarding invoice for legal services provided in connection with redistricting litigation.	Ex. C at 88; Ex. G at 47; Ex. Q at 88
DOC_0012420	Lieutenant Governor Dan Patrick	DOCX	ATC	3/11/2021					Legislative	Attached invoice to confidential communication between Lieutenant Governor Patrick staff and TLC regarding invoice for legal services provided in connection with redistricting litigation.	Ex. C at 88; Ex. G at 47; Ex. Q at 88
DOC_0356617	Representative Brooks Landgraf	PDF		8/22/2020					Legislative	Data relating to draft redistricting legislation for House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 3
DOC_0356620	Representative Brooks Landgraf	PDF	ste955	3/17/2021					Legislative	Data relating to draft redistricting legislation for House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 3
DOC_0356762	Representative Ryan Guillen	PDF	Jonathan Wilson (Rep. Guillen chief of staff)	7/27/2021					Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 7
DOC_0356841	Representative Ryan Guillen	PDF		7/30/2021					Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 8

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	Included in Private Plaintiffs' First Supplemental Brief (Dkt. 709)
DOC_0000105	Anna Mackin	DOCX	Casey Contres (Congressman Tony Gonzales former chief of staff)	10/1/2021					Legislative	Talking points for Senate Redistricting Committee hearing, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions	Ex. V at 11
DOC_0000175	Anna Mackin	PDF	Alelie Lila Valencia (Texas Demographic Center)	2/5/2021					Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	Ex. V at 11
DOC_0000213	Anna Mackin	PDF		4/13/2021					Legislative; Attorney Client; Work Product	Confidential retention letter from Lebotsky Keller to Lieutenant Governor Patrick and Senator Huffman, setting forth scope of representation and describing related redistricting legal issues, made for the purpose of facilitating the rendition of legal advice regarding redistricting litigation. The retention of Lebotsky Kelly and the firm's scope of work also reveals mental impressions on legislative process and policy.	Ex. G at 165
DOC_0000345	Anna Mackin	DOCX	Wroe Jackson (Senator Huffman general counsel)	7/19/2021					Legislative; Attorney Client; Work Product	Draft schedule for the redistricting process, prepared for Senator Huffman by Anna Mackin (attorney), reflecting and implicating legislative privileged thoughts, opinions, and mental impressions, as well as attorney advice and mental impressions.	Ex. V at 11
DOC_0000346	Anna Mackin	DOCX	Wroe Jackson (Senator Huffman general counsel)	7/21/2021					Legislative; Attorney Client Work Product	Draft schedule for the redistricting process, prepared for Senator Huffman by Anna Mackin (attorney), reflecting and implicating legislative privileged thoughts, opinions, and mental impressions, as well as attorney advice and mental impressions.	Ex. V at 11
DOC_0000349	Anna Mackin	DOCX	Wroe Jackson (Senator Huffman general counsel)	5/7/2021					Legislative; Attorney Client; Work Product	Draft schedule for the redistricting process, prepared for Senator Huffman by Anna Mackin (attorney), reflecting and implicating legislative privileged thoughts, opinions, and mental impressions, as well as attorney advice and mental impressions.	Ex. V at 11
DOC_0000350	Anna Mackin	DOCX	Wroe Jackson (Senator Huffman general counsel)	7/16/2021					Legislative; Attorney Client; Work Product	Draft schedule for the redistricting process, prepared for Senator Huffman by Anna Mackin (attorney), reflecting and implicating legislative privileged thoughts, opinions, and mental impressions, as well as attorney advice and mental impressions.	Ex. V at 11
DOC_0001173	Anna Mackin	MSG		4/13/2021	Scott Keller (attorney)	Darrel Davila	Chris Sterner (attorney); Alix Morris (Attorney); Sean Opperman (attorney); Anna Mackin (attorney); Todd Disher		Legislative; Attorney Client; Work Product	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	Ex. V at 11
DOC_0001268	Anna Mackin	MSG		8/27/2021	Gardner Pate; Jeff Oldham (attorney); Courtney Hjaltnan; Angela Colmenero	Sean Opperman (attorney)	Anna Mackin (attorney)		Legislation	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	Ex. G at 147; Ex. V at 11
DOC_0001271	Anna Mackin	MSG		8/30/2021	Gardner Pate; Jeff Oldham (attorney); Courtney Hjaltnan; Angela Colmenero (attorney).	Sean Opperman (attorney)	Anna Mackin		Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	Ex. G at 147; Ex. V at 11
DOC_0001283	Anna Mackin	MSG		9/8/2021	Anna Mackin (attorney)	Brad Lockerbie (consultant)			Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	Ex. G at 148; Ex. V at 11
DOC_0001285	Anna Mackin	MSG		9/8/2021	Anna Mackin (attorney)	Brad Lockerbie (consultant)			Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	Ex. G at 148; Ex. V at 12
DOC_0001326	Anna Mackin	MSG		9/19/2021	Anna Mackin (attorney); Sean Opperman (attorney)	Wendy Underhill	Ben Williams		Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	Ex. G at 150; Ex. V at 12
DOC_0001982	Senator Joan Huffman	PDF	State of Texas	9/29/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	Ex. G at 10; Ex. V at 2
DOC_0001983	Senator Joan Huffman	DOCX	SO	9/27/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	Ex. G at 10; Ex. V at 2
DOC_0001987	Senator Joan Huffman	DOCX	Allison Schmitz	10/16/2021					Legislative; Attorney Client; Work Product	Confidential bill draft and related materials, regarding draft redistricting legislation, including input from attorneys relating to proposed redistricting legislation.	Ex. G at 10; Ex. V at 2
DOC_0001988	Senator Joan Huffman	DOCX	Allison Schmitz	10/16/2021					Legislative; Attorney Client; Work Product	Confidential bill draft and related materials, regarding draft redistricting legislation, including input from attorneys relating to proposed redistricting legislation.	Ex. G at 10; Ex. V at 2
DOC_0001989	Senator Joan Huffman	DOCX	Zachary Stephenson	10/16/2021					Legislative; Attorney Client; Work Product	Confidential bill draft and related materials, regarding draft redistricting legislation, including input from attorneys relating to proposed redistricting legislation.	Ex. G at 10; Ex. V at 2
DOC_0001994	Senator Joan Huffman	DOCX	Sarah Willcox	10/12/2021					Legislative; Attorney Client; Work Product	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, including input from attorneys relating to proposed redistricting legislation.	Ex. G at 10; Ex. V at 2
DOC_0001996	Senator Joan Huffman	DOCX	Sarah Willcox	10/3/2021					Legislative; Attorney Client; Work Product	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, including input from attorneys relating to proposed redistricting legislation.	Ex. G at 11; Ex. V at 2

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	Included in Private Plaintiffs' First Supplemental Brief (Dkt. 709)
DOC_0001997	Senator Joan Huffman	DOCX	Sarah Willcox	10/1/2021					Legislative; Attorney Client; Work Product	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, including input from attorneys relating to proposed redistricting legislation	Ex. G at 11; Ex. V at 2
DOC_0002001	Senator Joan Huffman	DOCX	Sarah Willcox	9/21/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	Ex. G at 11; Ex. V at 2
DOC_0002555	Senator Joan Huffman	PDF	ATC	9/8/2021					Legislative; Attorney Client; Work Product	Confidential contract for the retention of expert services and related materials, sought for the purpose of providing expert consultation to aid in drafting and considering redistricting legislation.	Ex. G at 49; Ex. V at 3
DOC_0002577	Senator Joan Huffman	PDF	JSA	3/26/2021					Legislative; Attorney Client; Work Product	Confidential memorandum from Texas Legislative Council to members of the legislature relating to redistricting materials.	Ex. G at 19; Ex. V at 3
DOC_0002578	Senator Joan Huffman	PDF	JSA	3/26/2021					Legislative; Attorney Client; Work Product	Confidential memorandum from Texas Legislative Council to members of the legislature relating to redistricting materials.	Ex. G at 19; Ex. V at 3
DOC_0002700	Senator Joan Huffman	XLSX	KAG	2/20/2015					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 21; Ex. V at 3
DOC_0006821	Senator Joan Huffman	XLSX	Michael Hankins	8/13/2021					Legislative	Data relating to draft redistricting legislation for state board of education districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 23; Ex. V at 5
DOC_0006853	Senator Joan Huffman	PDF		10/5/2021	Senator Jean Huffman; Representative Todd Hunter	Congresswoman Sheila Jackson Lee; Congressman Al Green	Members of the Texas Senate and Texas House		Legislative	Confidential communication from Congresswoman Sheila Jackson Lee and Congressman Al Green to Senator Joan Huffman and Representative Todd Hunter, regarding draft redistricting legislation for congressional districts.	Ex. G at 23; Ex. V at 5
DOC_0006868	Senator Joan Huffman	PDF	State of Texas	10/4/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	Ex. G at 24; Ex. V at 5
DOC_0006873	Senator Joan Huffman	PDF	State of Texas	9/28/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	Ex. G at 24; Ex. V at 5
DOC_0007007	Senator Joan Huffman	PDF	o0600f0	1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 27; Ex. V at 6
DOC_0007008	Senator Joan Huffman	XLSX	KAG	2/20/2015					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	Ex. G at 27; Ex. V at 6
DOC_0012277	Lieutenant Governor Dan Patrick	PDF	James Whitehorne	4/1/2021					Legislative	Attachment to confidential communication between Lieutenant Governor Patrick staffers regarding redistricting data, made for a legislative purpose and reflecting privileged information, including thoughts, opinions, and mental impressions.	Ex. C at 88; Ex. Q at 88; Ex. V at 2
DOC_0012522	Lieutenant Governor Dan Patrick	JPG			Darrell Davila (Lt. Gov. Chief of Staff)	Luis Saenz (Gov. Abbott Chief of Staff)			Legislative	Confidential communication between Darrell Davila and Luis Saenz regarding redistricting, reflecting legislative thoughts, opinions, and mental impressions.	Ex. V at 2
DOC_0352802	Representative Jacey Jetton	PDF	Tori Macfarlan						Legislative	Communications received from members of the public regarding redistricting, with internal notes.	
DOC_0352803	Representative Jacey Jetton	XLSX	Tori Macfarlan						Legislative	Communications received from members of the public regarding redistricting, with internal notes.	
DOC_0352804	Representative Jacey Jetton	PDF	Tori Macfarlan						Legislative	Communications received from members of the public regarding redistricting, with internal notes.	
DOC_0352805	Representative Jacey Jetton	XLSX	Tori Macfarlan						Legislative	Communications received from members of the public regarding redistricting, with internal notes.	
DOC_0352806	Representative Jacey Jetton	PDF	Tori Macfarlan						Legislative	Communications received from members of the public regarding redistricting, with internal notes.	
DOC_0352807	Representative Jacey Jetton	XLSX	Tori Macfarlan						Legislative	Communications received from members of the public regarding redistricting, with internal notes.	
DOC_0352853	Representative Jacey Jetton	PDF	torim		Lewis Luckenbach	Representative Jetton			Legislative	Confidential communication regarding draft redistricting legislation.	Ex. V at 2
DOC_0356699	Representative Brooks Landgraf	PDF	State of Texas	10/4/2021					Legislative	Confidential document relating to draft redistricting legislation for House districts.	Ex. G at 3; Ex. V at 2
DOC_0356716	Representative Brooks Landgraf	PDF	State of Texas	10/9/2021					Legislative	Confidential document relating to draft redistricting legislation for House districts.	Ex. G at 4; Ex. V at 2