

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

LEAGUE OF UNITED LATIN AMERICAN CIT-IZENS, <i>et al.</i> ,	§	
<i>Plaintiffs,</i>	§	
EDDIE BERNICE JOHNSON, <i>et al.</i> ,	§	
<i>Plaintiff-Intervenors,</i>	§	Case No. 3:21-cv-00259 [Lead Case]
v.	§	
GREG ABBOTT, <i>et al.</i> ,	§	
<i>Defendants.</i>	§	
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ROSALINA RAMOS ABUABARA, <i>et al.</i> ,	§	
<i>Plaintiffs,</i>	§	
v.	§	Case No. 1:21-cv-965 [Consolidated Case]
JOHN SCOTT, <i>et al.</i> ,	§	
<i>Defendants.</i>	§	
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TEXAS STATE CONFERENCE OF THE NAACP,	§	
<i>Plaintiff,</i>	§	
v.	§	Case No. 1:21-cv-1006 [Consolidated Case]
GREG ABBOTT, <i>et al.</i> ,	§	
<i>Defendants.</i>	§	

UNOPPOSED MOTION TO EXTEND PAGE LIMIT

The LULAC, NAACP, and Abuabara plaintiffs move to compel the production of thirty-three documents in the possession of the Office of the Governor. ECF 380. Defendants respectfully seek leave to file a brief in opposition to that motion that does not exceed thirteen pages in length. Counsel

for Defendants has conferred with counsel for plaintiffs, and the latter has indicated they do not oppose this motion for leave. Therefore, Defendants respectfully request that the Court grant their motion for leave and allow them to file an opposition brief that does not exceed thirteen pages.

Date: July 8, 2022

Respectfully submitted.

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Attorney General of Texas

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COUNSEL FOR DEFENDANTS

CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the foregoing document was filed electronically (via CM/ECF) on July 8, 2022, and that all counsel of record were served by CM/ECF.

/s/ Patrick K. Sweeten
PATRICK K. SWEETEN

CERTIFICATE OF CONFERENCE

I certify that I conferred with counsel for plaintiffs respecting this motion for leave. Counsel indicated they do not oppose this motion for leave.

/s/ Patrick K. Sweeten
PATRICK K. SWEETEN

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LEAGUE OF UNITED LATIN AMERICAN
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ORDER

ORDER

Before the Court is the Legislators' Unopposed Motion to Extend Page Limit. The Court has considered the motion and FINDS that there is good cause for the motion to be granted.

IT IS THEREFORE ORDERED THAT:

The Motion to Extend Page Limit is **GRANTED**.

The Legislators **MAY FILE** an opposition brief that does not exceed thirteen pages.

So **ORDERED** and **SIGNED** on this ____ day of July, 2022.

**David C. Guaderrama,
United States District
Judge Western District
of Texas**

And on behalf of:

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

-and-

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

**IN THE UNITED STATES DISTRICT COURT
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GREG ABBOTT, *et al.*,

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OPPOSITION TO MOTION TO COMPEL

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INTRODUCTION

The LULAC, NAACP, and Abuabara plaintiffs move to compel the production of thirty-three documents in the possession of the Office of the Governor. ECF 380. As described in the privilege log produced by OOG, the motion should be denied because each of the documents at issue are protected by one or more of the privileges asserted.

The vast majority of these documents (23/33) are (i) drafts of the Governor's proclamation calling the third special session of the 87th Legislature, all of which were prepared by OOG attorneys and reflect the provision of legal advice to OOG staff, or (ii) emails between OOG attorneys and OOG staff attaching and discussing those drafts. These drafts and emails were prepared for the purpose of providing the OOG with legal advice on the Governor calling the third special session. As such, they are plainly subject to the attorney-client privilege.

These drafts and emails are also subject to the deliberative-process privilege because they were prepared in furtherance of the Governor's consideration of whether, when, and how to exercise the power to call a third special session. *See* Tex. Const. Article IV, § 8. The deliberative-process privilege, "a form of executive privilege," operates to "shield[] from disclosure 'documents reflecting advisory opinions, recommendations and deliberations comprising part of a process by which governmental decisions and policies are formulated.'" *United States Fish & Wildlife Service v. Sierra Club, Inc.*, 141 S. Ct. 777, 785–86 (2021) (quoting *NLRB v. Sears, Roebuck & Co.*, 421 U.S. 132, 150 (1975)). The focus of the protection is "predecisional, deliberative documents." *Id.* The drafts and emails are protected by the deliberative-process privilege because they constitute internal OOG deliberations about whether, when, and how to call a third special session.

Alternatively, documents relating to the convening of the legislature are protected by legislative privilege. Although Article IV, Section 1 of the Texas Constitution places the Governor in the executive department, other provisions give legislative prerogatives, such as the veto power. *See Jessen Assocs.*,

Inc. v. Bullock, 531 S.W.2d 593, 598 (Tex. 1975) (The governor’s “veto power is a legislative function and not an executive function.”). Other courts have understood the power to call special sessions of the legislature as a legislative power that supports the assertion of the legislative privilege. *Texas v. Holder*, No. 1:12-cv-128, 2012 WL 13070113, at *1 (D.D.C. June 7, 2012); *see also In re Turner*, 627 S.W.3d 654, 659–60 (Tex. 2021) (per curiam) (Legislative functions, like “[t]he powers to veto legislation and call special legislative sessions belong constitutionally to the Governor, not the Legislature.”). Indeed, federal courts regularly recognize that state governors are entitled to the legislative privilege for actions done pursuant to their legislative powers. *See League of Women Voters of Florida, Inc. v. Lee*, 340 F.R.D. 446, 454 (N.D. Fla. 2021) (explaining that the legislative privilege “cover[s] ‘both governors’ and legislators’ actions in the proposal, formulation, and passage of legislation.”) (quoting *In re Hubbard*, 803 F.3d 1298, 1308 (11th Cir. 2015)). As such, to the extent that convening the legislature is a legislative function, documents regarding the Governor’s consideration and calling of the third special session are subject to the legislative privilege.

In addition, one withheld document is an internal email between OOG staff discussing the publication of a letter to the United States Census Bureau. The letter—which was produced—inquired of the Census Bureau when the Census data will be released. The withheld email is a predecisional, deliberative communication regarding the sending of the letter. It is therefore subject to the deliberative process-privilege.

BACKGROUND

The NAACP, LULAC, and Abuabara plaintiffs served their first set of document requests on the Governor on March 3rd, March 5th, and March 17th, respectively. The Governor timely responded to each request, producing documents bates labelled STATE-REDISTRICTING_000001 to STATE-REDISTRICTING_000669, and serving responses and objections. On April 28th, the parties met to confer on the responses and objections, at which time Defendants explained that a forthcoming

privilege would likely more fulsomely address plaintiffs' concerns.

Accordingly, and consistent with the thirty-day deadline set forth by the Court's ESI order, *see* ECF 203, the Governor served his initial privilege log on the NAACP and LULAC plaintiffs on May 4th (and on May 18th for Abuabara). The parties met to confer on that privilege log on May 12th and May 19th. OOG agreed to supplement its privilege log in response to plaintiffs' concerns. It did so, providing a supplemental privilege on May 25th, providing substantial additional information for the privilege entries. Plaintiffs complain about the level of detail in the supplemental privilege log, but that complaint is undercut by plaintiffs' own privilege logs, which contain far less detail. *See* Ex. A (MALC privilege log); Ex. B (Representative Martinez Fischer privilege log); Ex. C (LULAC privilege log).

Delaying nearly a month, plaintiffs emailed counsel for the Governor on June 22nd, informing counsel that plaintiffs "intend to file a joint motion to compel tomorrow at 5pm CT." Ex. D (email). Counsel for the Governor attempted to limit the scope of the dispute, explaining that the twenty-three documents relating to the draft proclamation were (i) plainly privileged, and (ii) irrelevant to plaintiffs' claims. *See id.* Plaintiffs refused to narrow their motion, rejecting the assertions of attorney-client privilege as "boilerplate." *Id.* But LULAC's own privilege assertions are substantively similar to the Governor's. *Compare* ECF 380-14 (OOG privilege log) ("Document related to draft proclamation of special session. Includes legal advice from OOG attorneys on the substance, legal compliance, and strategy of the subject of the document."), *with* Ex. D (LULAC privilege log) ("Confidential email to Texas Latino Redistricting Task Force regarding legislative developments and upcoming redistricting communications, including attorney analysis, mental impressions, strategy and/or legal advice.").

In any event, the parties were unfortunately unable to limit the scope of their dispute. Plaintiffs filed their motion to compel on June 27th, which was docketed by the Clerk as ECF 380 later the same day. Upon further review, OOG has determined to withdraw privilege assertions over a number of

these documents.¹ These documents are being produced shortly after the filing of this brief. The proceeding portion of this brief addresses the remaining documents—all internal communications between OOG counsel and staff—over which OOG continues to withhold based on various privileges. Defendants are happy to make these documents available to the Court for *in camera* review should it be found necessary or helpful.

ARGUMENT

I. Documents and Communications Regarding a Proclamation Calling a Special Session

As introduced above, twenty-three of the thirty-three documents plaintiffs seek are either drafts of the proclamation calling the third special session or emails attaching and discussing those drafts.² Three privileges apply to these documents: the attorney-client privilege, attorney work product, and either the deliberative-process or legislative privilege.

A. These Documents Are Protected by the Attorney Client and Work Product Privileges

The drafts and emails are plainly subject to the attorney-client privilege. To establish that this privilege applies, the proponent must establish: “(1) that he made a confidential communication; (2) to a lawyer or his subordinate; (3) for the primary purpose of securing either a legal opinion or legal services, or assistance in some legal proceeding.” *EEOC v. BDO USA, LLP*, 876 F.3d 690, 695 (5th Cir. 2017) (quotation omitted). In addition, a “draft document is protected under the attorney-client privilege if ‘the draft itself contains protected confidential communications from the client or the attorney.’” *Cause of Action Inst. v. United States DOJ*, 330 F. Supp. 3d 336, 350 (D.D.C. 2018) (“A” (quoting *Loftin v. Bande*, 258 F.R.D. 31, 35 (D.D.C. 2009); see also *SEC v. Beacon Hill Asset Mgmt.*, 231

¹ These documents are as follows: DOC_0356598, DOC_0356600, DOC_0356606, DOC_0356560, DOC_0356561, DOC_0356586, DOC_0356587, and DOC_0356588. In addition, OOG has determined that DOC_0356599 may be produced with internal annotations redacted.

² These documents are as follows: DOC_0356555, DOC_0356556, DOC_0356557, DOC_0356571, DOC_0356578, DOC_03565979, DOC_0356580, DOC_0356581, DOC_0356582, DOC_0356583, DOC_0356584, DOC_0356585, DOC_0356590, DOC_0356591, DOC_0356592, DOC_0356593, DOC_0356594, DOC_0356595, DOC_0356596, DOC_0356597, DOC_0356604, DOC_0356609, and DOC_0356610.

F.R.D. 134, 145 (S.D.N.Y. 2004) (“Drafts of documents prepared by an attorney for subsequent transmission to third parties” are privileged where “the draft document contains confidential information communicated by the client to the attorney that is maintained in confidence.”).

The attorney client privilege applies to the drafts because they contain confidential information communicated to the client (OOG) by attorneys. Indeed, these drafts reflect notes, edits, and annotations from OOG attorneys that relate to the legal issues surrounding the calling of the third special session. The privilege also applies to the email communications between OOG attorneys and staff because they are confidential communications by OOG attorneys made the purpose of providing legal advice regarding the calling of the third special session. The Court need go no further to determine that the attorney client privilege applies.

Plaintiffs hardly dispute that the drafts and emails are privileged. Their main defense is to argue that the privilege entries are “conclusory.” Mot. at 20. That is simply wrong. The entries clearly communicate that the withheld documents are drafts of a proclamation calling a special session, and emails discussing those drafts, both of which were prepared or sent for the purpose of providing legal advice on issuing the call. In addition, as noted above, plaintiffs can hardly claim an inability to understand these privilege assertions when their own attorney-client privilege assertions are substantially similar. *Compare* ECF 380-14 (OOG privilege log), *with* Ex. D (LULAC privilege log).

Plaintiffs also contend that the attorney-client privilege does not apply because part of the documents and communications concern “advice on political, strategic or policy issues.” Mot. at 21 (quoting *Baldus v. Brennan*, No. 2:11-cv-562, 2011 WL 6385645, at *3 (E.D. Wis. Dec. 20, 2011)). To be sure, *part* of the purpose for these documents’ creation was to deliberate and consider whether, when, and how to call a third special session. But *Baldus* held only that the attorney-client protection was unavailable if the *sole* purpose of the document was to communicate political advice. *See* 2011 WL 6385645, at *3. The privilege applies where, as here, a “primary purpose” of the communication is to

provide legal advice, *EEOC*, 876 F.3d at 695. As reflected in the privilege log, the communications reflect the provision of legal advice from OOG attorneys to staff. Moreover, as explained below, the fact that these drafts and emails were prepared in part to aid OOG policy deliberations means that they are also protected by the deliberative-process (or legislative) privilege.

The work product privilege also applies to these documents. Plaintiffs suggest that the work product doctrine is categorically inapplicable to such draft documents, Mot. 23–24, but documents relating to the legal compliance of a draft proclamation are documents created as part of assessing litigation risk. They are not categorically excluded from the work product protection. *See United States v. Davis*, 636 F.2d 1028, 1040 (5th Cir. 1981) (asking whether “the primary motivating purpose behind the creation of the document was to aid in possible future litigation”). Accepting plaintiffs’ arguments—that legal work related to draft proclamations is neither privileged nor protected as work product—would create perverse incentives for governmental officials. *See Upjohn Co. v. United States*, 449 U.S. 383, 392 (1981). It would make no sense to deny the privilege for documents created by attorneys for the purpose of ensuring the legal compliance of a future expected action. But ultimately, the Court need not resolve the parties’ dispute about work product for the withheld documents, given the applicable attorney-client and legislative (or deliberative process) privileges justifying the withholding of the same documents.

B. These Documents Are also Protected by the Deliberative-Process Privilege

The drafts and emails are protected for the additional reason that they are subject to the deliberative-process privilege. That privilege protects “predecisional, deliberative” materials. *U.S. Fish & Wildlife Serv.*, 141 S. Ct. at 785. “Documents are ‘predecisional’ if they were generated before the agency’s final decision on the matter, and they are ‘deliberative’ if they were prepared to help the agency formulate its position.” *Id.* “In particular, it is well-settled that ‘[d]raft documents, by their very nature, are typically predecisional and deliberative. They reflect only the tentative view of their authors; views

that might be altered or rejected upon further deliberation either by their authors or by superiors.” *MacNamara v. City of New York*, 249 F.R.D. 70, 78 (S.D.N.Y. 2008) (quoting *Exxon Corp. v. Dept. of Energy*, 585 F. Supp. 690, 698 (D.D.C.1983)).

The proclamation drafts and emails discussing them are quintessential deliberative materials. They reveal OOG mental impressions on the reasons why to call a special session, and the manner in which a special session should be called. Further, the communications are clearly pre-decisional given that they were created prior to September 7, 2021, which was the date the Governor issued the proclamation calling the third special session. Courts regularly uphold privilege assertions as to documents and communications regarding similar executive acts. *See e.g., Citizens United for City of New York v. Att’y General of New York*, 269 F. Supp. 3d 124, 165–66 (S.D.N.Y. 2017) (upholding deliberative-process privilege as to draft executive order); *Reporters Committee for Freedom of the Press v. FBI*, 3 F.4th 350, 364–65 (D.C. Cir. 2021) (upholding deliberative-process privilege as to draft executive report).

Plaintiffs do not attempt to deny that the deliberative-process privilege applies to these drafts and emails. Mot. at 15–20. Instead, they argue that the privilege can only be asserted by the “agency head.” *Id.* at 17 (quoting *In re McKesson Govt. Entities Average Wholesale Price Litig.*, 264 F.R.D. 595, 601 (N.D. Cal. 2009)). This position has been almost uniformly rejected. *Moorhead v. Lane*, 125 F.R.D. 680, n.1 (C.D. Ill. 1989) (“[T]he head of the agency need not assert the privilege. It is sufficient that an agency representative do so.”); *Landry v. FDIC*, 204 F.3d 1125, 1135 (D.C. Cir. 2000) (“[I]t would be counterproductive to read “head of the department” in the narrowest possible way.”); *Marriot Int’l Reports, LP v. United States*, 437 F.3d 1302, 1307 (Fed. Cir. 2006) (“Delegated review by a subordinate undoubtedly results in a more thorough, more consistent, and timelier review of potentially privileged documents than personal review by the Agency head.”). Indeed, the very case plaintiffs cite has been criticized as inadvertently confusing the deliberative-process privilege with the state-secrets privilege. *See Scalia v. Int’l Longshore & Warehouse Union*, 336 F.R.D. 603, 610–11 (N.D. Cal. 2020). OOG

representatives have expressly reviewed the documents at issue and directed counsel to assert the deliberative-process privilege. That is all that is required.

In addition, plaintiffs argue that the deliberative-process should “yield.” Mot. at 19; *see also id.* at 12–15 (making same argument as to legislative privilege). They further argue that piercing the privilege is necessary in order to “shed light on . . . government misconduct.” *Id.* at 19 (quoting *In re Sealed Case*, 121 F.3d 729, 738 (D.C. Cir. 1997)). The problem is that plaintiffs offer absolutely no evidence of government misconduct. They cannot meet the required showing to defeat the deliberative-process privilege. *See, e.g., American Petroleum Tankers Parent, LLC v. United States*, 952 F. Supp. 2d 252, 268 (D.D.C. 2013) (“To invoke the government-misconduct exception, the party seeking discovery must provide an adequate factual basis for believing that the requested discovery would shed light upon government misconduct.”); *see also Hinckley v. United States*, 140 F.3d 277, 285 (D.C. Cir. 1998) (“The deliberative process privilege would soon be meaningless, if all someone seeking information otherwise protected under the privilege had to establish is that there was disagreement within the governmental entity at some point in the decisionmaking process”).

Plaintiffs identify no particular facts that support an inference of government misconduct. In other cases, parties attempting to pierce the privilege have pointed to concrete allegations of government wrongdoing. *See, e.g., Convertino v. United States Dept. of Justice*, 674 F.Supp.2d 97, 100 (D.D.C.2009) (allegations that the Department of Justice leaked information regarding an investigation into purported prosecutorial misconduct by an Assistant United States Attorney). Plaintiffs point to nothing of the sort here. *See* Mot. at 12–15. At most, plaintiffs recognize that OOG communicated with legislative staff on two occasions: to discuss the receipt of the Census data and, relatedly, to discuss the schedule for the potential third special session. They do not identify any direct or circumstantial evidence relating to those events that suggest misconduct on OOG’s behalf.

Plaintiffs also ask the Court to disregard the privilege due to “the seriousness of the litigation

and issues involved.” Mot. at 14. But that exception would swallow the rule and discourage thoughtful deliberation in the executive branch. “An uncertain privilege, or one which purports to be certain but results in widely varying applications by the courts, is little better than no privilege at all.” *Upjohn*, 449 U.S. at 393. As in all cases, executive officers are entitled to consider and deliberate their official actions and policies in private; only when a party provides particular reason of unique circumstances can the privilege be set aside.

Finally, plaintiffs argue that OOG concedes the relevance of the documents by listing them on the privilege log. Mot. at 13. Not so—OOG has consistently disputed the relevance of the documents plaintiffs seek, and expressly noted that any responses to plaintiffs’ document requests were made subject OOG’s objections. *See, e.g.*, ECF 380-6 (OOG’s objections to LULAC plaintiffs’ document requests) (“A portion of the requested production is also irrelevant to Plaintiffs’ claims and is thus identified individually below.”) (“These responses and objections are made without waiving any further objections to, or admitting the relevancy or materiality of, any of the information or documents requested.”); ECF 380-7 (similar, as to NAACP); 380-9 (similar, as to Abuabara); *see also* Ex. E (email (“Moreover, I do not understand how these documents are at all related to the LULAC, NAACP, and Abuabara plaintiffs’ claims. What is your relevance basis for seeking these documents?)). Plaintiffs have consistently asserted relevance at a high level of generality, failing to identify any specific connection between their claims and the documents sought. *See id.* (plaintiffs’ email response) (“Regarding the relevance of the 23 documents you listed, given their subject matter, they pertain to the process and/or circumstances surrounding the enactment of the challenged redistricting legislation.”).

* * *

The deliberative-process privilege protects deliberative, predecisional materials pertaining to the formation of executive decisions or policies. The proclamation drafts and emails discussing those drafts clearly fall within that protection. And plaintiffs’ arguments for why the privilege should yield

are unavailing. The Court should uphold the privilege and deny the motion to compel on this basis.

C. In the Alternative, these Documents Are Protected by the Legislative Privilege

These drafts and emails are also subject to the legislative privilege. As explained above, calling a special session of the legislature is best understood as an executive action. But in the alternative, it may also be understood as a legislative action. Indeed, the three-judge court in *Texas v. Holder* understood the issue exactly in this way:

The Texas Constitution grants the Governor the power to call special legislative sessions, Tex. Const. art. IV § 8(a), and to declare emergency matters to be considered early in the legislative session, Tex. Const. art. III § 5(b). In our view, both of these functions—convening the legislature and placing items at the top of its agenda—constitute “integral steps in the legislative process,” that come within the scope of the legislative privilege

Texas, 2012 WL 13070113, at *1 (quoting *Bogan v. Scott-Harris*, 523 U.S. 44, 55 (1998)); *see also Gray v. Mills*, No. 1:21-cv-71, 2021 WL 5166157, at *3 (D. Me. Nov. 5, 2021) (The Governor of Maine’s “decisions around whether and when to convene the Legislature in the face of a global pandemic are the sort of ‘quintessentially legislative conduct that [the legislative privilege] doctrine protects.’”).

Insofar as the legislative privilege applies to the Governor’s decision to call the third special session, the privilege plainly applies to the proclamation drafts and internal OOG emails discussing the drafts. The legislative privilege has long “protect[ed] ‘against inquiry into acts that occur in the regular course of the legislative process and into the motivation for those acts’” and “precludes any showing of how [a legislator] acted, voted, or decided.” *United States v. Helstoski*, 442 U.S. 477, 489 (1979). It generally shields those that hold the privilege and their agents from undertaken when “acting in the sphere of legitimate legislative activity.” *Tenney v. Brandhove*, 341 U.S. 367, 376 (1951); *see also Texas*, 2012 WL 13070060, at *4 (the privilege protects against inquiry into “motivations with respect to a bill (*e.g.*, why a legislator voted a particular way, why a legislator supported or opposed different amendments, why a bill sponsor included different language in various Voter-ID bills, what factual information a legislator did or did not consider in supporting or opposing a bill, etc.).” Applying

legislative privilege, courts of appeals have precluded plaintiffs from seeking discovery from legislators in redistricting and other intentional discrimination suits. *See Lee v. City of Los Angeles*, 908 F.3d 1175, 1186-88 (9th Cir. 2018). The Eleventh Circuit, for example, has explained that “[t]he privilege protects the legislative process itself, and therefore covers both governors’ and legislators’ actions in the proposal, formulation, and passage of legislation.” *In re Hubbard*, 803 F.3d at 1308.

The documents are protected by the legislative privilege for much the same reason that they would be protected by the deliberative-process privilege. That is, they reveal OOG mental impressions as to what the Governor considered in calling a third special session, and why he did so. Furthermore, these communications reflect pre-decisional discussions as they are dated prior to the September 7, 2021 proclamation calling the special session. Whether the act is inherently executive or legislative makes little difference. The drafts and emails directly address considerations and motivations for calling the Legislature into session. For this reason, they are protected by the legislative privilege.

In arguing that the power to convene the legislature is not legislative in nature, plaintiffs fail to mention the authorities cited above. *See* Mot. at 11–12. They also misconstrue the Texas Supreme Court’s decision in *In re Turner*. They quote the Court as saying the Governor “has not exercised the Legislature’s power,” *Id.* at 12, but that statement referred to the Legislature’s power to *pass legislation*. *See* 627 S.W.3d at 660. Plaintiffs offer no other explanation why this power is not legislative.

As with the deliberative-process privilege, plaintiffs argue that the legislative privilege should yield, in this instance based on the five-factor balancing test applied in *Rodriguez v. Pataki*, 280 F. Supp. 2d 89, 100–01 (S.D.N.Y. 2003). Mot. at 12–15. Moreover, they rely in large part on the stayed decision in *La Union Del Pueblo Entero v. Abbott*, No. 5:21-cv-844, 2022 WL 1667687, at *2 (W.D. Tex. May 25, 2022), *appeal docketed sub nom. LULAC v. Hughes*, No. 22-50435 (5th Cir. May 27, 2022). But as before, plaintiffs present no compelling reason why the privilege should yield, or even why they need the documents at all. As explained above, plaintiffs fail to explain what documents they seek, or why those

documents are relevant to their claims. They further fail to identify any connection between redistricting and OOG besides the Governor's calling the third special session. *See* Mot. at 13. Nor should the legislative privilege be pierced, as plaintiffs suggest, simply because this is a redistricting case. *Id.* at 14. Such a ruling would conflict with the Ninth Circuit's ruling in *Lee*, 908 F.3d at 1186–88.

The proclamation drafts and the emails discussing them give direct insight into OOG's mental impressions as to whether, when, and how to call a third special session. To the extent the power to convene the legislature is a legislative function, those documents are subject to the legislative privilege. Plaintiffs' arguments for why the privilege should be disregarded lack merit. The motion to compel should be for this independent reason.

II. Communications Regarding a Letter to the Census Bureau

In addition, one document is an email discussing a letter that was ultimately sent from OOG and other governors' offices to the United States Census Bureau. This letter (which was produced, *see* Ex. E) recognizes that the Bureau failed to timely deliver the Census data, and inquires when it will be delivered. The withheld document, DOC_0356569, is an OOG internal email discussing that draft.

This document is subject to the deliberative-process privilege because it is a predecisional, deliberative communication made for the purpose of considering a future policy action: sending an official letter. Executive offices regularly assert this privilege of documents and communications relating to government letters. *See, e.g., Campaign Legal Center v. U.S. DOJ*, 34 F.4th 14, 23–24 (upholding assertion of deliberative-process privilege as to documents relating to draft letter); *Canning v. U.S. Dept. of State*, 346 F. Supp. 1, 25–26 (D.D.C. 2018) (same). As such, DOC_0356569 is subject to the deliberative-process privilege and was properly withheld.

III. Dropbox Documents

Finally, two documents, DOC_0356598 and DOC_0356600, are email communications from Senate staff attaching a Dropbox link. Plaintiffs contend that OOG should be made to produce all

documents available through the link, *see* Mot. at 25–26, but those documents are not in OOG’s custody, possession or control. OOG never accessed the Dropbox site, and so never downloaded those documents. OOG has no knowledge of the contents of those documents. Indeed, OOG is not presently aware that it even has access to those documents. As such, OOG neither has actual possession of those documents nor the ability to control them. Because OOG has complied with its Rule 34 obligations, this Court should deny the plaintiffs’ motion to compel on this point.

CONCLUSION

Defendants respectfully request that the Court deny plaintiffs’ motion to compel. As stated above, Defendants are happy to make these documents available to the Court for *in camera* review should it be found necessary or helpful.

Date: July 8, 2022

Respectfully submitted.

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Attorney General of Texas

/s/ Patrick K. Sweeten
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COUNSEL FOR DEFENDANTS

CERTIFICATE OF SERVICE

I certify that a true and accurate copy of the foregoing document was filed electronically (via CM/ECF) on July 8, 2022, and that all counsel of record were served by CM/ECF.

/s/ Patrick K. Sweeten
PATRICK K. SWEETEN

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION**

MEXICAN AMERICAN LEGISLATIVE	§	Civil Action
CAUCUS, TEXAS HOUSE OF	§	
REPRESENTATIVES,	§	
	§	
Plaintiffs	§	
	§	Case No. 21-cv-259-DCG-JES-JVB
v.	§	
	§	
STATE OF TEXAS, GREG ABBOTT,	§	
GOVERNOR OF THE	§	
STATE OF TEXAS, in his official capacity,	§	
and JOHN SCOTT,	§	
SECRETARY OF STATE OF TEXAS, in his	§	
official capacity	§	
Defendants	§	

PLAINTIFF MALC’S PRIVILEGE LOG

Plaintiff Mexican American Legislative Caucus (“MALC”) serves the attached Privilege Log and reserves all rights with respect to the assertion of attorney-client privilege and attorney work product doctrine. To the extent any document is omitted from this log and was inadvertently produced, MALC reserves the right to snap-back the document and insist that any such inadvertently produced documents be destroyed and not retained.

In the attached Privilege Log, for each document identified that bears an assertion of “Privilege” that document is being withheld on the basis of attorney-client privilege, attorney work product doctrine, and common interest, joint defense, or allied litigant privilege.

Dated: July 5, 2022

Respectfully submitted,

SOMMERMAN, MCCAFFITY,
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The undersigned certifies that the foregoing Response to Motion to Consolidate was filed and served via CM/ECF electronic service on July 5, 2022 to all counsel of record.

/s/ Sean J. McCaffity

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Fwd: Declaration for review/signature.msg	Christian Vieira[cvieira@malc.org]	Sean McCaffity[SMcCaffity@texttrial.com]; Jaclyn Uresti[juresti@malc.org]; Irma Reyes[ireyes@malc.org]; Christian Vieira[cvieira@malc.org]; Joaquin Gonzalez[jgonzalez@malc.org]		11/22/2021 13:10	Privileged
Fwd: DOJ Interview Request with Chairman Anchia.msg	Christian Vieira[cvieira@malc.org]	Jaclyn Uresti[juresti@malc.org]; Irma Reyes[ireyes@malc.org]; Tannya Oliva[toliva@malc.org]; Joaquin Gonzalez[jgonzalez@malc.org]		11/19/2021 14:14	Privileged
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Fwd: MALC v. Abbott Scheduling Issues ASAP.msg	Jaclyn Uresti[juresti@malc.org]	Sean McCaffity[SMcCaffity@texttrial.com]; Christian Vieira[cvieira@malc.org]; Irma Reyes[ireyes@malc.org]; Joaquin Gonzalez[jgonzalez@malc.org]		12/23/2021 12:47	Privileged
Fwd: Meeting with Representative Anchia.msg	Christian Vieira[cvieira@malc.org]	Susan Farley[susan.farley@civitascapital.com]; Ana Reyes[Ana.Reyes@house.texas.gov]; Jaclyn Uresti[juresti@malc.org]; Irma Reyes[ireyes@malc.org]; Tannya Oliva[toliva@malc.org]; Joaquin Gonzalez[jgonzalez@malc.org]		11/19/2021 15:10	Privileged
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Litigation Update: DOJ Sues TX & El Paso Hearing Tomorrow.msg	Irma Reyes[ireyes@malc.org]	Irma Reyes[ireyes@malc.org]	Jaclyn Uresti[juresti@malc.org]; Tannya Oliva[toliva@malc.org]; Christian Vieira[cvieira@malc.org]	12/6/2021 17:52	Privileged
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Meeting with CHC TX Delegation 10/19 @ 6:30pm.msg	Tannya Oliva[toliva@malc.org]	Ana Hernandez[ana15@msn.com]; Armando Martinez[amtz059@hotmail.com]; Mary González[mary@maryegonzalez.com]; Rafael Anchia[rafael.anchia@civitascapital.com]; awalle29@yahoo.com[awalle29@yahoo.com]; repeddierodriguez@gmail.com[repeddierodriguez@gmail.com]	Irma Reyes[ireyes@malc.org]; JJ Garza[JJ.Garza@house.texas.gov]; Jaclyn Uresti[juresti@malc.org]; Joaquin Gonzalez[jgonzalez@malc.org]; Paige Bufkin[Paige.Bufkin@house.texas.gov]; Rahul Sreenivasan[rahul.sreenivasan@house.texas.gov]; Scott Jenkines[scott.jenkines@house.texas.gov]; summerc.luciano@gmail.com[summerc.luciano@gmail.com]	10/19/2021 14:50	Privileged
member decs.msg	Sean McCaffity[SMcCaffity@texttrial.com]	Joaquin Gonzalez[jgonzalez@malc.org]; Christian Vieira[cvieira@malc.org]	Irma Reyes[ireyes@malc.org]; Jaclyn Uresti[juresti@malc.org]	12/12/2021 12:14	Privileged
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Order on state TI.msg	Joaquin Gonzalez[jgonzalez@malc.org]	Rafa Anchia[rafaanchia@gmail.com]; Jaclyn Uresti[juresti@malc.org]; Irma Reyes[ireyes@malc.org]; Christian Vieira[cvieira@malc.org]; Tannya Oliva[toliva@malc.org]; Sean McCaffity[SMcCaffity@texttrial.com]; Tex Quesada[Quesada@texttrial.com]; Jose[garzpalm@aol.com]		12/22/2021 12:06	Privileged
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Preservation of Signal or Other Ephemeral Messaging Apps.msg	Christian Vieira[cvieira@malc.org]	Rafael Anchia[Rafael.Ancia@civitascapital.com]	Joaquin Gonzalez[jgonzalez@malc.org]; Sean McCaffity[SMcCaffity@texttrial.com]; Jaclyn Uresti[juresti@malc.org]; Irma Reyes[ireyes@malc.org]; Tannya Oliva[toliva@malc.org]	1/14/2022 12:51	Privileged
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2021.10.06 SMQG Fee Agreement (002).docx				10/7/2021 16:02	Privileged
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RE: [EXTERNAL] DOJ Meeting Request: Rep. Morales Shaw.msg	Freeman, Daniel (CRT)[Daniel.Freeman@usdoj.gov]	Christian Vieira[cvieira@malc.org]	Irma Reyes[ireyes@malc.org]; Anderson, Jacki (CRT)[Jacki.Anderson@usdoj.gov]; Mellett, Timothy F (CRT)[Timothy.F.Mellett@usdoj.gov]; Joaquin Gonzalez[jgonzalez@malc.org]; Sitton, Jaye (CRT)[Jaye.Sitton@usdoj.gov]	12/1/2021 10:22	Privileged
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Re: El Paso 3 judge panel.msg	Rafa Anchia[rafaanchia@gmail.com]	Joaquin Gonzalez[jgonzalez@malc.org]	Christian Vieira[cvieira@malc.org]; Irma Reyes[ireyes@malc.org]; Jaclyn Uresti[juresti@malc.org]; Sean McCaffity[SMcCaffity@texttrial.com]; Tannya Oliva[toliva@malc.org]; Tex Quesada[Quesada@texttrial.com]	10/21/2021 9:38	Privileged
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Re: FW: Wednesday 2:00 p.m. Docket - 261st District Court.msg	Christian Vieira[cvieira@malc.org]	Sean McCaffity[SMcCaffity@texttrial.com]	Joaquin Gonzalez[jgonzalez@malc.org]; Tex Quesada[Quesada@texttrial.com]; Jaclyn Uresti[juresti@malc.org]; Irma Reyes[ireyes@malc.org]	12/8/2021 8:04	Privileged
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Re: Meeting with Representative Meza.msg	Christian Vieira[cvieira@malc.org]	Freeman, Daniel (CRT)[Daniel.Freeman@usdoj.gov]	Mellett, Timothy F (CRT)[Timothy.F.Mellett@usdoj.gov]; Lott, Jasmin (CRT)[Jasmin.Lott@usdoj.gov]; Irma Reyes[ireyes@malc.org]	11/23/2021 10:38	Privileged
Re: member decs.msg	Jaclyn Uresti[juresti@malc.org]	Joaquin Gonzalez[jgonzalez@malc.org]	Sean McCaffity[SMcCaffity@textrial.com]; Christian Vieira[cvieira@malc.org]; Irma Reyes[ireyes@malc.org]	12/12/2021 14:03	Privileged
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File_Name	Email_From	row	Email_CC	DateFamily	.Privileged
RE: News Alert: 2020 Census missed 18.8 million people, agency estimates, amid pandemic, natural disasters and Trump administration's sped-up timeline.msg	Rafael Anchia[rafael.anchia@civitascapital.com]	Irma Reyes[ireyes@malc.org]; Christian Vieira[cvieira@malc.org]; Tannya Oliva[toliva@malc.org]; Joaquin Gonzalez[jgonzalez@malc.org]; Sean McCaffity[SMcCaffity@textrial.com]; Tex Quesada[quesada@textrial.com]		3/10/2022 14:12	Privileged
Re: Order on state TI.msg	Joaquin Gonzalez[jgonzalez@malc.org]	Irma Reyes[ireyes@malc.org]	Rafa Anchia[rafaanchia@gmail.com]; Jaclyn Uresti[juresti@malc.org]; Christian Vieira[cvieira@malc.org]; Tannya Oliva[toliva@malc.org]; Sean McCaffity[SMcCaffity@textrial.com]; Tex Quesada[Quesada@textrial.com]; Jose[garzpalm@aol.com]	12/22/2021 12:29	Privileged
RE: phone call at your convenience.msg	Tex Quesada[Quesada@textrial.com]	Irma Reyes[ireyes@malc.org]	Jaclyn Uresti[juresti@malc.org]; Joaquin Gonzalez[jgonzalez@malc.org]; Sean McCaffity[SMcCaffity@textrial.com]	11/18/2021 17:06	Privileged
Re: PI Motion.msg	Joaquin Gonzalez[jgonzalez@malc.org]	Irma Reyes[ireyes@malc.org]		12/9/2021 14:41	Privileged
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Re: Preservation of Signal or Other Ephemeral Messaging Apps.msg	Rafael Anchia[rafael.anchia@civitascapital.com]	Christian Vieira[cvieira@malc.org]	Joaquin Gonzalez[jgonzalez@malc.org]; Sean McCaffity[SMcCaffity@textrial.com]; Jaclyn Uresti[juresti@malc.org]; Irma Reyes[ireyes@malc.org]; Tannya Oliva[toliva@malc.org]	1/14/2022 13:06	Privileged
Re: Press Release: TxSCOTUS Oral Arguments.msg	Joaquin Gonzalez[jgonzalez@malc.org]	Sean McCaffity[SMcCaffity@textrial.com]	Christian Vieira[cvieira@malc.org]; Jaclyn Uresti[juresti@malc.org]; Irma Reyes[ireyes@malc.org]	3/22/2022 16:13	Privileged
Re: Press Release: TxSCOTUS Oral Arguments.msg	Sean McCaffity[SMcCaffity@textrial.com]	Christian Vieira[cvieira@malc.org]	Joaquin Gonzalez[jgonzalez@malc.org]; Jaclyn Uresti[juresti@malc.org]; Irma Reyes[ireyes@malc.org]	3/22/2022 16:05	Privileged
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Re: Prison Gerrymandering suit.msg	Jose[garzpalm@aol.com]	jgonzalez@malc.org[jgonzalez@malc.org]; SMcCaffity@textrial.com[SMcCaffity@textrial.com]; Quesada@textrial.com[Quesada@textrial.com]; juresti@malc.org[juresti@malc.org]; ireyes@malc.org[ireyes@malc.org]		10/19/2021 11:05	Privileged
RE: QR story on today's oral arguments.msg	Rafael Anchia[rafael.anchia@civitascapital.com]	Irma Reyes[ireyes@malc.org]; Christian Vieira[cvieira@malc.org]; Joaquin Gonzalez[jgonzalez@malc.org]; Sean McCaffity[SMcCaffity@textrial.com]; George Quesada Jr.[quesada@textrial.com]	Tannya Oliva[toliva@malc.org]; Jaclyn Uresti[juresti@malc.org]	3/23/2022 15:44	Privileged
Re: Recommendation re: Joining SOS Lawsuits.msg	Jaclyn Uresti[juresti@malc.org]	Irma Reyes[ireyes@malc.org]	Rafael Anchia[rafael.anchia@civitascapital.com]; Sean McCaffity[SMcCaffity@textrial.com]; Joaquin Gonzalez[jgonzalez@malc.org]; Christian Vieira[cvieira@malc.org]; Tannya Oliva[toliva@malc.org]	2/3/2022 16:36	Privileged
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Re: Redistricting -- Priority Deposition List.msg	Christian Vieira[cvieira@malc.org]	Irma Reyes[ireyes@malc.org]	Jaclyn Uresti[juresti@malc.org]; Tannya Oliva[toliva@malc.org]	3/17/2022 16:04	Privileged
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RE: Response Requested: DOJ Interview Request.msg	JJ Garza[JJ.Garza@house.texas.gov]	Irma Reyes[ireyes@malc.org]		1/19/2022 16:13	Privileged
RE: Response Requested: DOJ Interview Request.msg	Patricia Newman[Patricia.Newman@house.texas.gov]	Irma Reyes[ireyes@malc.org]		1/19/2022 16:04	Privileged
Re: Response Requested: DOJ Interview Request.msg	Christian Vieira[cvieira@malc.org]	Paulina Tamayo[Paulina.Tamayo@house.texas.gov]	Irma Reyes[ireyes@malc.org]; Brooke Bennett Galindo[Brooke.Bennett@house.texas.gov]	1/18/2022 14:34	Privileged
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RE: Response Rqstd: SOS Ltr + SOS Amicus.msg	Amanda Gonzalez[Amanda.Gonzalez@house.texas.gov]	Irma Reyes[ireyes@malc.org]		2/8/2022 12:37	Privileged
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Re: Response Rqstd: SOS Ltr + SOS Amicus.msg	Eddie Rodriguez[repeddierodriguez@gmail.com]	Irma Reyes[ireyes@malc.org]	Rafael Anchia[rafael.anchia@civitascapital.com]; Mary Gonzalez[mary@marygonzalez.com]; Ana Hernandez[ana15@msn.com]; Armando Martinez[amtz059@hotmail.com]; Armando Walle[AWalle29@yahoo.com]; Jaclyn Uresti[juresti@malc.org]; Tannya Oliva[toliva@malc.org]; JJ Garza[jj.garza@house.texas.gov]; Adriana Aguirre Hernandez[Adriana.Aguirre@house.texas.gov]; Scott Jenkines[scott.jenkines@house.texas.gov]; Rahul Sreenivasan[rahul.sreenivasan@house.texas.gov]; Summer C Luciano[SummerC.Luciano@house.texas.gov]	2/7/2022 11:50	Privileged
Re: Response Rqstd: SOS Ltr + SOS Amicus.msg	Mary González[mary@marygonzalez.com]	Irma Reyes[ireyes@malc.org]	Rafael Anchia[rafael.anchia@civitascapital.com]; Armando Walle[awalle29@yahoo.com]; Armando Martinez[amtz059@hotmail.com]; Ana Hernandez[ana15@msn.com]; Eddie Rodriguez[repeddierodriguez@gmail.com]; Jaclyn Uresti[juresti@malc.org]; Tannya Oliva[toliva@malc.org]; Christian Vieira[cvieira@malc.org]; JJ Garza[jj.garza@house.texas.gov]; Rahul Sreenivasan[rahul.sreenivasan@house.texas.gov]; Scott Jenkines[scott.jenkines@house.texas.gov]; Adriana Aguirre Hernández[Adriana.Aguirre@house.texas.gov]; Summer C Luciano[SummerC.Luciano@house.texas.gov]	2/7/2022 11:48	Privileged
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REDISTRICTING UPDATE: SB7, SB4, SB6.msg	Tannya Oliva[toliva@malc.org]	Jaclyn Uresti[juresti@malc.org]; Irma Reyes[ireyes@malc.org]; Christian Vieira[cvieira@malc.org]		10/14/2021 18:46	Privileged

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September invoice.msg	Jose[garz palm@aol.com]	ireyes@malc.org[ireyes@malc.org]; juresti@malc.org[juresti@malc.org]		10/4/2021 9:01	Privileged
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Texas Legislative Council Relationship with Members.msg	Jaclyn Uresti[juresti@malc.org]	Sean McCaffity[SMcCaffity@textrial.com]; Joaquin Gonzalez[jgonzalez@malc.org]	Irma Reyes[ireyes@malc.org]; Christian Vieira[cvieira@malc.org]	12/8/2021 18:22	Privileged
Texas Redistricting: Phil Cortez.msg	Freeman, Daniel (CRT)[Daniel.Freeman@usdoj.gov]	Irma Reyes[ireyes@malc.org]; jgonzalez@malc.org[jgonzalez@malc.org]	Berlin, Holly (CRT)[Holly.Berlin@usdoj.gov]	4/8/2022 9:13	Privileged
Update on Remaining DOJ Interview Requests.msg	Christian Vieira[cvieira@malc.org]	Irma Reyes[ireyes@malc.org]; Jaclyn Uresti[juresti@malc.org]; Joaquin Gonzalez[jgonzalez@malc.org]	Tannya Oliva[toliva@malc.org]	1/12/2022 13:25	Privileged
Updated Hold Guidance: MALC v Abbott .msg	Irma Reyes[ireyes@malc.org]	Irma Reyes[ireyes@malc.org]	Jaclyn Uresti[juresti@malc.org]; Tannya Oliva[toliva@malc.org]; Christian Vieira[cvieira@malc.org]; Joaquin Gonzalez[jgonzalez@malc.org]	1/24/2022 13:27	Privileged
Fwd: Document2.msg	Joaquin Gonzalez[jgonzalez@malc.org]	Jaclyn Uresti[juresti@malc.org]; Irma Reyes[ireyes@malc.org]; Tannya Oliva[toliva@malc.org]		10/3/2021 17:15	Privileged
For Approval: Statement on State Order.msg	Irma Reyes[ireyes@malc.org]	Tex Quesada[quesada@textrial.com]; Sean McCaffity[SMcCaffity@textrial.com]; Joaquin Gonzalez[jgonzalez@malc.org]	Jaclyn Uresti[juresti@malc.org]	12/22/2021 14:11	Privileged
Fwd: D-1-GN-21-006168; In re Mexican American Legislative Caucus.msg	Irma Reyes[ireyes@malc.org]	Christian Vieira[cvieira@malc.org]; Tannya Oliva[toliva@malc.org]		12/12/2021 23:04	Privileged
Fwd: DRAFT Litigation Update II: Robert Koepke v. The Legislature of Texas.msg	Irma Reyes[ireyes@malc.org]	Cara Santucci[caratxhdc@gmail.com]		1/13/2022 13:58	Privileged
Fwd: Final Versions.msg	Irma Reyes[ireyes@malc.org]	Tannya Oliva[toliva@malc.org]		11/2/2021 16:52	Privileged

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Fwd: Memo regarding Committee Amendments for HB 1.msg	Irma Reyes[ireyes@malc.org]	Jaclyn Uresti[juresti@malc.org]; Tannya Oliva[toliva@malc.org]		12/3/2021 13:38	Privileged
Fwd: News Alert: 2020 Census missed 18.8 million people, agency estimates, amid pandemic, natural disasters and Trump administration's sped-up timeline.msg	Irma Reyes[ireyes@malc.org]	Rafael Anchia[rafael.anchia@civitascapital.com]; Christian Vieira[cvieira@malc.org]; Tannya Oliva[toliva@malc.org]; Joaquin Gonzalez[jgonzalez@malc.org]; Sean McCaffity[SMcCaffity@textrial.com]; Tex Quesada[quesada@textrial.com]		3/10/2022 13:34	Privileged
Fwd: Response Requested: DOJ Interview Request.msg	Irma Reyes[ireyes@malc.org]	Christian Vieira[cvieira@malc.org]		2/14/2022 16:27	Privileged
Fwd: Rule 202 Petition.msg	Irma Reyes[ireyes@malc.org]	Christian Vieira[cvieira@malc.org]		11/19/2021 13:15	Privileged
Fwd: word documents from Perez litigation.msg	Irma Reyes[ireyes@malc.org]	Jose[garzpalm@aol.com]		12/16/2021 9:21	Privileged
MALC Board Update: Filing Complaints Tomorrow.msg	Irma Reyes[ireyes@malc.org]	Rafael Anchia[rafael.anchia@civitascapital.com]; Mary González[mary@maryegonzalez.com]; Ana Hernandez[ana15@msn.com]; Armando Martinez[amtz059@hotmail.com]; Eddie Rodriguez[repeddierodriguez@gmail.com]; Armando Walle[awalle29@yahoo.com]	Jaclyn Uresti[juresti@malc.org]; Tannya Oliva[toliva@malc.org]	11/2/2021 17:19	Privileged
2021.11.02 Final Federal MALC Complaint (003).pdf				11/2/2021 17:19	Privileged
2021.11.02 POP.pdf				11/2/2021 17:19	Privileged
PDFs: Fees.msg	Irma Reyes[ireyes@malc.org]	Jose[garzpalm@aol.com]		11/10/2021 8:37	Privileged
2014 Out of Pocket of and Expert Costs.pdf				11/10/2021 8:37	Privileged
MALC COSTS 2014-2015.pdf				11/10/2021 8:37	Privileged
MALC Expert-related Expenses - 12-20-10 through 1-27-12.pdf				11/10/2021 8:37	Privileged
Re: 2021 Bank Statements.msg	Irma Reyes[ireyes@malc.org]	Camilla Edwards[CamillaE@cpasatx.com]		2/22/2022 12:11	Privileged
Re: Call.msg	Irma Reyes[ireyes@malc.org]	Sean McCaffity[SMcCaffity@textrial.com]	Joaquin Gonzalez[jgonzalez@malc.org]; Jaclyn Uresti[juresti@malc.org]; Jose[garzpalm@aol.com]; Nicole Pioli[npioli@textrial.com]	10/12/2021 17:53	Privileged
Re: Call.msg	Irma Reyes[ireyes@malc.org]	Sean McCaffity[SMcCaffity@textrial.com]	Joaquin Gonzalez[jgonzalez@malc.org]; Jaclyn Uresti[juresti@malc.org]	10/12/2021 17:40	Privileged
Re: Conf call.msg	Irma Reyes[ireyes@malc.org]	Joaquin Gonzalez[jgonzalez@malc.org]	Christian Vieira[cvieira@malc.org]; Sean McCaffity[SMcCaffity@textrial.com]; Jaclyn Uresti[juresti@malc.org]	12/1/2021 12:54	Privileged
Re: Conf call.msg	Irma Reyes[ireyes@malc.org]	Jaclyn Uresti[juresti@malc.org]	Sean McCaffity[SMcCaffity@textrial.com]; Joaquin Gonzalez[jgonzalez@malc.org]; Christian Vieira[cvieira@malc.org]	12/1/2021 13:36	Privileged
Re: Contact info for filing.msg	Irma Reyes[ireyes@malc.org]	Joaquin Gonzalez[jgonzalez@malc.org]	Christian Vieira[cvieira@malc.org]; Tannya Oliva[toliva@malc.org]; Jaclyn Uresti[juresti@malc.org]	1/21/2022 11:30	Privileged
Re: Declaration for review/signature.msg	Irma Reyes[ireyes@malc.org]	Christian Vieira[cvieira@malc.org]	Sean McCaffity[SMcCaffity@textrial.com]; Jaclyn Uresti[juresti@malc.org]; Joaquin Gonzalez[jgonzalez@malc.org]	11/22/2021 13:39	Privileged
Re: Engagement Letter.msg	Irma Reyes[ireyes@malc.org]	Sean McCaffity[SMcCaffity@textrial.com]	Jaclyn Uresti[juresti@malc.org]	11/17/2021 16:57	Privileged
2021.11.17 SMQG Fee Agreement (002).docx				11/17/2021 16:57	Privileged
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Re: Engagement Letter.msg	Irma Reyes[ireyes@malc.org]	Sean McCaffity[SMcCaffity@textrial.com]	Joaquin Gonzalez[jgonzalez@malc.org]; Jaclyn Uresti[juresti@malc.org]	11/3/2021 16:30	Privileged
Re: Final Complaints.msg	Irma Reyes[ireyes@malc.org]	Jaclyn Uresti[juresti@malc.org]	Tannya Oliva[toliva@malc.org]	11/2/2021 16:43	Privileged
Re: For Approval: Statement on State Order.msg	Irma Reyes[ireyes@malc.org]	Sean McCaffity[SMcCaffity@textrial.com]		12/22/2021 20:01	Privileged
Re: For Approval: Statement on State Order.msg	Irma Reyes[ireyes@malc.org]	Sean McCaffity[SMcCaffity@textrial.com]		12/22/2021 18:00	Privileged
Re: Litigation hold.msg	Irma Reyes[ireyes@malc.org]	Sean McCaffity[SMcCaffity@textrial.com]	Joaquin Gonzalez[jgonzalez@malc.org]; Jaclyn Uresti[juresti@malc.org]	1/6/2022 12:17	Privileged
Re: MALC v. Abbott Scheduling Issues ASAP.msg	Irma Reyes[ireyes@malc.org]	Sean McCaffity[SMcCaffity@textrial.com]	Jaclyn Uresti[juresti@malc.org]; Joaquin Gonzalez[jgonzalez@malc.org]; Tannya Oliva[toliva@malc.org]; Christian Vieira[cvieira@malc.org]; Tex Quesada[quesada@textrial.com]	12/21/2021 16:51	Privileged

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Re: MALC v. Abbott Scheduling Issues ASAP.msg	Irma Reyes[ireyes@malc.org]	Sean McCaffity[SMcCaffity@textrial.com]	Jaclyn Uresti[juresti@malc.org]; Joaquin Gonzalez[jgonzalez@malc.org]; Tannya Oliva[toliva@malc.org]; Christian Vieira[cvieira@malc.org]; Tex Quesada[Quesada@textrial.com]	12/21/2021 14:44	Privileged
Re: Order on state TI.msg	Irma Reyes[ireyes@malc.org]	Joaquin Gonzalez[jgonzalez@malc.org]	Rafa Anchia[rafaanchia@gmail.com]; Jaclyn Uresti[juresti@malc.org]; Christian Vieira[cvieira@malc.org]; Tannya Oliva[toliva@malc.org]; Sean McCaffity[SMcCaffity@textrial.com]; Tex Quesada[Quesada@textrial.com]; Jose[garzpalm@aol.com]	12/22/2021 12:19	Privileged
Re: PDFs: Fees.msg	Irma Reyes[ireyes@malc.org]	Jose[garzpalm@aol.com]		11/11/2021 20:21	Privileged
Addendum MALC Legal Expenses (1).pdf				11/11/2021 20:21	Privileged
Re: PI Motion.msg	Irma Reyes[ireyes@malc.org]	Joaquin Gonzalez[jgonzalez@malc.org]	Sean McCaffity[SMcCaffity@textrial.com]; Jaclyn Uresti[juresti@malc.org]; Tex Quesada[Quesada@textrial.com]; Christian Vieira[cvieira@malc.org]	12/9/2021 14:37	Privileged
Re: proposed attorney retainer.msg	Irma Reyes[ireyes@malc.org]	Tex Quesada[Quesada@textrial.com]	juresti@malc.org[juresti@malc.org]; Sean McCaffity[SMcCaffity@textrial.com]; Nicole Pioli[npioli@textrial.com]	10/7/2021 18:23	Privileged
Re: Recommendation re: Joining SOS Lawsuits.msg	Irma Reyes[ireyes@malc.org]	Rafael Anchia[rafael.anchia@civitascapital.com]	Sean McCaffity[SMcCaffity@textrial.com]; Joaquin Gonzalez[jgonzalez@malc.org]; Christian Vieira[cvieira@malc.org]; Jaclyn Uresti[juresti@malc.org]; Tannya Oliva[toliva@malc.org]	2/3/2022 14:35	Privileged
Re: Recommendation re: Joining SOS Lawsuits.msg	Irma Reyes[ireyes@malc.org]	Rafael Anchia[rafael.anchia@civitascapital.com]	Jaclyn Uresti[juresti@malc.org]; Sean McCaffity[SMcCaffity@textrial.com]; Joaquin Gonzalez[jgonzalez@malc.org]; Christian Vieira[cvieira@malc.org]; Tannya Oliva[toliva@malc.org]	2/3/2022 16:51	Privileged
Re: Redistricting -- Priority Deposition List.msg	Irma Reyes[ireyes@malc.org]	Christian Vieira[cvieira@malc.org]	Jaclyn Uresti[juresti@malc.org]; Tannya Oliva[toliva@malc.org]	3/17/2022 16:00	Privileged
Re: Redistricting -- Priority Deposition List.msg	Irma Reyes[ireyes@malc.org]	Christian Vieira[cvieira@malc.org]	Jaclyn Uresti[juresti@malc.org]; Tannya Oliva[toliva@malc.org]	3/17/2022 16:19	Privileged
Re: REDISTRICTING UPDATE: SB7, SB4, SB6.msg	Irma Reyes[ireyes@malc.org]	Tannya Oliva[toliva@malc.org]	Jaclyn Uresti[juresti@malc.org]; Christian Vieira[cvieira@malc.org]	10/14/2021 19:18	Privileged
Re: Response Requested: DOJ Interview Request.msg	Irma Reyes[ireyes@malc.org]	JJ Garza[JJ.Garza@house.texas.gov]		1/27/2022 10:48	Privileged
Re: Response Requested: DOJ Interview Request.msg	Irma Reyes[ireyes@malc.org]	JJ Garza[JJ.Garza@house.texas.gov]		1/25/2022 14:22	Privileged
Re: Response Requested: DOJ Interview Request.msg	Irma Reyes[ireyes@malc.org]	JJ Garza[JJ.Garza@house.texas.gov]		1/24/2022 16:48	Privileged
Re: Response Requested: DOJ Interview Request.msg	Irma Reyes[ireyes@malc.org]	JJ Garza[JJ.Garza@house.texas.gov]		1/19/2022 16:40	Privileged
Re: Response Requested: DOJ Interview Request.msg	Irma Reyes[ireyes@malc.org]	JJ Garza[JJ.Garza@house.texas.gov]		1/25/2022 15:07	Privileged
Re: Response Requested: DOJ Interview Request.msg	Irma Reyes[ireyes@malc.org]	JJ Garza[JJ.Garza@house.texas.gov]	cvieira@malc.org[cvieira@malc.org]	1/19/2022 16:06	Privileged
Re: Response Requested: DOJ Interview Request.msg	Irma Reyes[ireyes@malc.org]	JJ Garza[JJ.Garza@house.texas.gov]		1/24/2022 18:53	Privileged
Re: Response Requested: DOJ Interview Request.msg	Irma Reyes[ireyes@malc.org]	JJ Garza[JJ.Garza@house.texas.gov]	Christian Vieira[cvieira@malc.org]	1/18/2022 15:53	Privileged
Re: Setting up call to discuss federal complaint.msg	Irma Reyes[ireyes@malc.org]	Joaquin Gonzalez[jgonzalez@malc.org]	Sean McCaffity[SMcCaffity@textrial.com]; Jaclyn Uresti[juresti@malc.org]; Christian Vieira[cvieira@malc.org]; Tannya Oliva[toliva@malc.org]	1/3/2022 15:05	Privileged
Re: Setting up call to discuss federal complaint.msg	Irma Reyes[ireyes@malc.org]	Jaclyn Uresti[juresti@malc.org]	Joaquin Gonzalez[jgonzalez@malc.org]; Sean McCaffity[SMcCaffity@textrial.com]; Christian Vieira[cvieira@malc.org]; Tannya Oliva[toliva@malc.org]	1/3/2022 14:48	Privileged
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Re: word documents from Perez litigation.msg	Irma Reyes[ireyes@malc.org]	Tex Quesada[Quesada@textrial.com]	Nicole Pioli[npioli@textrial.com]; Jaclyn Uresti[juresti@malc.org]	12/16/2021 9:21	Privileged
Time-Sensitive: Statement for Approval.msg	Irma Reyes[ireyes@malc.org]	Sean McCaffity[SMcCaffity@textrial.com]; Joaquin Gonzalez[jgonzalez@malc.org]		11/2/2021 15:35	Privileged

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anchia/gonzalez meeting re: redistricting maps (specific time pending).msg	Rafael Anchia[Rafael.Ancia@house.texas.gov]	'Rafael Anchia'[rafael.anchia@civitascapital.com]; 'Anchia, Rafael (Rafael.Ancia@haynesboone.com)'; Abel Mulugheta[Abel.Mulugheta@house.texas.gov]; Jeff Madden_HC[Jeff.Madden_HC@house.texas.gov]; juresti@malc.org[juresti@malc.org]; Irma Reyes (ireyes@malc.org)[ireyes@malc.org]; Tannya Oliva[toliva@malc.org]		9/7/2021 12:41	Privileged
invitation: redistricting 1:1 - rep. c. morales & joaquin @ wed sep 15, 2021 11am - 11:45am (cdt) (ireyes@malc.org).msg	toliva@malc.org[toliva@malc.org]	ireyes@malc.org[ireyes@malc.org]; jgonzalez@malc.org[jgonzalez@malc.org]		9/9/2021 18:29	Privileged
invitation: redistricting 1:1 - rep. herrero & joaquin @ fri sep 10, 2021 1pm - 1:45pm (cdt) (ireyes@malc.org).msg	toliva@malc.org[toliva@malc.org]	ireyes@malc.org[ireyes@malc.org]; joaquin@texascivilrightsproject.org[joaquin@texascivilrightsproject.org]; juresti@malc.org[juresti@malc.org]; jgonzalez@malc.org[jgonzalez@malc.org]		9/9/2021 11:21	Privileged
invitation: redistricting 1:1 - rep. lopez & joaquin @ mon sep 13, 2021 11pm - 11:45pm (cdt) (ireyes@malc.org).msg	toliva@malc.org[toliva@malc.org]	ireyes@malc.org[ireyes@malc.org]; joaquin@texascivilrightsproject.org[joaquin@texascivilrightsproject.org]; juresti@malc.org[juresti@malc.org]; jgonzalez@malc.org[jgonzalez@malc.org]		9/9/2021 11:26	Privileged
invitation: redistricting 1:1 - rep. ordaz perez & joaquin @ tue sep 14, 2021 3pm - 3:45pm (cdt) (ireyes@malc.org).msg	toliva@malc.org[toliva@malc.org]	ireyes@malc.org[ireyes@malc.org]; joaquin@texascivilrightsproject.org[joaquin@texascivilrightsproject.org]; juresti@malc.org[juresti@malc.org]; jgonzalez@malc.org[jgonzalez@malc.org]		9/9/2021 11:35	Privileged
invitation: redistricting 1:1 - rep. romero & joaquin @ tue sep 14, 2021 9am - 9:45am (cdt) (ireyes@malc.org).msg	toliva@malc.org[toliva@malc.org]	ireyes@malc.org[ireyes@malc.org]; joaquin@texascivilrightsproject.org[joaquin@texascivilrightsproject.org]; juresti@malc.org[juresti@malc.org]; jgonzalez@malc.org[jgonzalez@malc.org]		9/9/2021 11:33	Privileged
invitation: redistricting 101 - all on the line @ tue sep 21, 2021 9:30am - 10:30am (cdt) (ireyes@malc.org).msg	juresti@malc.org[juresti@malc.org]	ireyes@malc.org[ireyes@malc.org]; jerry@philipsmeachum.com[jerry@philipsmeachum.com]; jgonzalez@malc.org[jgonzalez@malc.org]; toliva@malc.org[toliva@malc.org]; kurt@philipsmeachum.com[kurt@philipsmeachum.com]; vancleve@redistrictingaction.org[vancleve@redistrictingaction.org]		9/20/2021 16:23	Privileged
malc board meeting with counsel.msg	Rafael Anchia[Rafael.Ancia@house.texas.gov]	Rafael Anchia[rafael.anchia@civitascapital.com]; Anchia, Rafael[Rafael.Ancia@haynesboone.com]; Abel Mulugheta[Abel.Mulugheta@house.texas.gov]; Jeff Madden_HC[Jeff.Madden_HC@house.texas.gov]; juresti@malc.org[juresti@malc.org]; Irma Reyes[ireyes@malc.org]; Tannya Oliva[toliva@malc.org]; jgonzalez@malc.org[jgonzalez@malc.org]		9/15/2021 11:27	Privileged
malc board meeting with counsel.msg	Rafael Anchia[Rafael.Ancia@house.texas.gov]	Rafael Anchia[rafael.anchia@civitascapital.com]; Anchia, Rafael (Rafael.Ancia@haynesboone.com)[Rafael.Ancia@haynesboone.com]; Abel Mulugheta[Abel.Mulugheta@house.texas.gov]; Jeff Madden_HC[Jeff.Madden_HC@house.texas.gov]; juresti@malc.org[juresti@malc.org]; Irma Reyes (ireyes@malc.org)[ireyes@malc.org]; Tannya Oliva[toliva@malc.org]; jgonzalez@malc.org[jgonzalez@malc.org]		9/13/2021 16:51	Privileged
MALC Board Meeting Zoom 2:30pm.msg	Irma Reyes[ireyes@malc.org]	Jose[garzpalma@aol.com]; Joaquin Gonzalez[jgonzalez@malc.org]		9/15/2021 11:16	Privileged
Re: CALL REQUEST W/ANCHIA: REDISTRICTING COUNSEL.msg	Tannya Oliva[toliva@malc.org]	Ana Reyes[Ana.Reyes@house.texas.gov]	Irma Reyes[ireyes@malc.org]	8/25/2021 11:53	Privileged
RE: CALL REQUEST W/ANCHIA: REDISTRICTING COUNSEL.msg	Ana Reyes[Ana.Reyes@house.texas.gov]	'Tannya Oliva'[toliva@malc.org]	Irma Reyes[ireyes@malc.org]	8/25/2021 11:41	Privileged
Re: CALL REQUEST W/ANCHIA: REDISTRICTING COUNSEL.msg	Tannya Oliva[toliva@malc.org]	Ana Reyes[Ana.Reyes@house.texas.gov]	Irma Reyes[ireyes@malc.org]	8/25/2021 11:29	Privileged
RE: CALL REQUEST W/ANCHIA: REDISTRICTING COUNSEL.msg	Ana Reyes[Ana.Reyes@house.texas.gov]	'Tannya Oliva'[toliva@malc.org]	Irma Reyes[ireyes@malc.org]	8/25/2021 11:16	Privileged
Re: MALC Board Meeting Zoom 2:30pm.msg	Joaquin Gonzalez[jgonzalez@malc.org]	Irma Reyes[ireyes@malc.org]	Jose[garzpalma@aol.com]	9/15/2021 11:29	Privileged

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redistricting litigation meeting with joaquin gonzalez, tex quesada, & sean mcaffity.msg	Rafael Anchia[Rafael.Ancia@house.texas.gov]	rafael.anchia@civitascapital.com[rafael.anchia@civitascapital.com]; Anchia, Rafael (Rafael.Ancia@haynesboone.com)[Rafael.Ancia@haynesboone.com]; Abel Mulugheta[Abel.Mulugheta@house.texas.gov]; Jeff Madden_HC[Jeff.Madden_HC@house.texas.gov]; juresti@malc.org[juresti@malc.org]; Irma Reyes (ireyes@malc.org)[ireyes@malc.org]; Tannya Oliva[toliva@malc.org]		9/24/2021 20:00	Privileged
redistricting litigation meeting with joaquin gonzalez, tex quesada, & sean mcaffity.msg	Rafael Anchia[Rafael.Ancia@house.texas.gov]	rafael.anchia@civitascapital.com[rafael.anchia@civitascapital.com]; Anchia, Rafael (Rafael.Ancia@haynesboone.com)[Rafael.Ancia@haynesboone.com]; Abel Mulugheta[Abel.Mulugheta@house.texas.gov]; Jeff Madden_HC[Jeff.Madden_HC@house.texas.gov]; juresti@malc.org[juresti@malc.org]; Irma Reyes (ireyes@malc.org)[ireyes@malc.org]; Tannya Oliva[toliva@malc.org]		9/24/2021 20:00	Privileged
redistricting litigation meeting with joaquin gonzalez, tex quesada, & sean mcaffity.msg	Rafael Anchia[Rafael.Ancia@house.texas.gov]	rafael.anchia@civitascapital.com[rafael.anchia@civitascapital.com]; Anchia, Rafael (Rafael.Ancia@haynesboone.com)[Rafael.Ancia@haynesboone.com]; Abel Mulugheta[Abel.Mulugheta@house.texas.gov]; Jeff Madden_HC[Jeff.Madden_HC@house.texas.gov]; juresti@malc.org[juresti@malc.org]; Irma Reyes (ireyes@malc.org)[ireyes@malc.org]; Tannya Oliva[toliva@malc.org]		9/27/2021 9:18	Privileged
rma conference call with joaquin gonzalez and james slattery of texas civil rights project re: redistricting counsel.msg	Rafael Anchia[Rafael.Ancia@house.texas.gov]	'Rafael Anchia'[rafael.anchia@civitascapital.com]; 'Anchia, Rafael (Rafael.Ancia@haynesboone.com)'[Rafael.Ancia@haynesboone.com]; Abel Mulugheta[Abel.Mulugheta@house.texas.gov]; Jeff Madden_HC[Jeff.Madden_HC@house.texas.gov]; juresti@malc.org[juresti@malc.org]; Irma Reyes (ireyes@malc.org)[ireyes@malc.org]; 'Tannya Oliva'[toliva@malc.org]		8/25/2021 12:49	Privileged
rma joins zoom with ndrc.msg	Rafael Anchia[Rafael.Ancia@house.texas.gov]	rafael.anchia@civitascapital.com[rafael.anchia@civitascapital.com]; rafael.anchia@haynesboone.com[rafael.anchia@haynesboone.com]; 'ireyes@malc.org'[ireyes@malc.org]; Tannya Oliva[toliva@malc.org]; Jaclyn Uresti[juresti@malc.org]		8/11/2021 10:42	Privileged
updated invitation: redistricting 1:1 - rep. lopez & joaquin @ mon sep 13, 2021 11am - 11:45am (cdt) (ireyes@malc.org).msg	toliva@malc.org[toliva@malc.org]	joaquin@texascivilrightsproject.org[joaquin@texascivilrightsproject.org]; juresti@malc.org[juresti@malc.org]; jgonzalez@malc.org[jgonzalez@malc.org]		9/9/2021 11:31	Privileged
Fwd: Setting aside time to talk maps and litigation.msg	Jaclyn Uresti[juresti@malc.org]	Irma Reyes[ireyes@malc.org]		9/27/2021 9:14	Privileged
MALC Redistricting Update (test).msg	Rafael Anchia[info@malc.org]	Irma Reyes[ireyes@malc.org]; Tannya Oliva[toliva@malc.org]; Jaclyn Uresti[juresti@malc.org]		9/16/2021 16:26	Privileged
Re: Setting aside time to talk maps and litigation.msg	Joaquin Gonzalez[jgonzalez@malc.org]	Tex Quesada[Quesada@textrial.com]	Jaclyn Uresti[juresti@malc.org]; Sean McCaffity[SMcCaffity@textrial.com]; Ana Reyes[anareyes.ftbx@gmail.com]; Tannya Oliva[toliva@malc.org]; Irma Reyes[ireyes@malc.org]	9/26/2021 18:18	Privileged
Re: Setting aside time to talk maps and litigation.msg	Joaquin Gonzalez[jgonzalez@malc.org]	Tex Quesada[Quesada@textrial.com]	Jaclyn Uresti[juresti@malc.org]; Sean McCaffity[SMcCaffity@textrial.com]; Ana Reyes[anareyes.ftbx@gmail.com]; Tannya Oliva[toliva@malc.org]; Irma Reyes[ireyes@malc.org]	9/24/2021 16:53	Privileged
RE: Setting aside time to talk maps and litigation.msg	Tex Quesada[Quesada@textrial.com]	Jaclyn Uresti[juresti@malc.org]; Sean McCaffity[SMcCaffity@textrial.com]	Joaquin Gonzalez[jgonzalez@malc.org]; Ana Reyes[anareyes.ftbx@gmail.com]; Tannya Oliva[toliva@malc.org]; Irma Reyes[ireyes@malc.org]	9/24/2021 16:48	Privileged

MALC PRIVILEGE LOG

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Re: Setting aside time to talk maps and litigation.msg	Jaclyn Uresti[juresti@malc.org]	Sean McCaffity[SMcCaffity@textrial.com]	Joaquin Gonzalez[jgonzalez@malc.org]; Ana Reyes[anareyes.fbtx@gmail.com]; Tex Quesada[Quesada@textrial.com]; Tannya Oliva[toliva@malc.org]; Irma Reyes[ireyes@malc.org]	9/24/2021 16:43	Privileged
RE: Setting aside time to talk maps and litigation.msg	Sean McCaffity[SMcCaffity@textrial.com]	Joaquin Gonzalez[jgonzalez@malc.org]; Ana Reyes[anareyes.fbtx@gmail.com]; Tex Quesada[Quesada@textrial.com]; Tannya Oliva[toliva@malc.org]; Irma Reyes[ireyes@malc.org]; Jaclyn Uresti[juresti@malc.org]		9/24/2021 11:13	Privileged
Re: Test 2.msg	Tannya Oliva[toliva@malc.org]	Ana Hernandez, MALC Legal Counsel[info@malc.org]	Jaclyn Uresti[juresti@malc.org]; Irma Reyes[ireyes@malc.org]	9/16/2021 16:30	Privileged
Setting aside time to talk maps and litigation.msg	Joaquin Gonzalez[jgonzalez@malc.org]	Ana Reyes[anareyes.fbtx@gmail.com]; Sean McCaffity[SMcCaffity@textrial.com]; Tex Quesada[Quesada@textrial.com]; Tannya Oliva[toliva@malc.org]; Irma Reyes[ireyes@malc.org]; Jaclyn Uresti[juresti@malc.org]		9/23/2021 16:12	Privileged
Test 2.msg	Ana Hernandez, MALC Legal Counsel[info@malc.org]	Jaclyn Uresti[juresti@malc.org]; Tannya Oliva[toliva@malc.org]; Irma Reyes[ireyes@malc.org]		9/16/2021 16:27	Privileged
Redistricting Update.msg	Irma Reyes[ireyes@malc.org]	Irma Reyes[ireyes@malc.org]	Joaquin Gonzalez[jgonzalez@malc.org]; Jaclyn Uresti[juresti@malc.org]; Tannya Oliva[toliva@malc.org]	9/1/2021 18:25	Privileged
Example Attorney fees filing & Announcing Counsel.msg	Jaclyn Uresti[juresti@malc.org]	Tex Quesada[quesada@textrial.com]; Sean McCaffity[SMcCaffity@textrial.com]	Irma Reyes[ireyes@malc.org]	9/1/2021 17:43	Privileged
Fwd: Attached: Sample Engagement Letter.msg	Jaclyn Uresti[juresti@malc.org]	Rafael Anchia[rafael.anchia@civitascapital.com]; AH[ana15@msn.com]	Irma Reyes[ireyes@malc.org]	8/30/2021 14:10	Privileged
Fwd: Fw: Memo regarding Committee Amendments for HB 1.msg	Jaclyn Uresti[juresti@malc.org]	Joaquin Gonzalez[jgonzalez@malc.org]; Sean McCaffity[SMcCaffity@textrial.com]	Irma Reyes[ireyes@malc.org]; Tannya Oliva[toliva@malc.org]	10/1/2021 11:38	Privileged
Fwd: TOMORROW: HDC Redistricting Briefing.msg	Cara Santucci[caratxhdc@gmail.com]	Chad Dunn[chad@brazilanddunn.com]; Gary Bledsoe[garybledsoe@sbglobal.net]; Gary Bledsoe[gbledsoe@thebledsoelawfirm.com]	Irma Reyes[ireyes@malc.org]; Jaclyn Uresti[juresti@malc.org]; Phillip Martin[philliptxhdc@gmail.com]	9/7/2021 15:07	Privileged
Fwd: TPs for Civic Club Meetings.msg	Ana Hernandez[ana15@msn.com]	Irma Reyes[ireyes@malc.org]		8/2/2021 18:02	Privileged
Fwd: Voting Rights Update.msg	Rafael Anchia[rafael.anchia@civitascapital.com]	Irma Reyes[ireyes@malc.org]; Jaclyn Uresti[juresti@malc.org]; Tannya Oliva[toliva@malc.org]		9/17/2021 10:28	Privileged
Gutierrez Litigaiton.msg	Jose[garzpalm@aol.com]	quesada@textrial.com[quesada@textrial.com]; smccaffity@textrial.com[smccaffity@textrial.com]; jgonzalez@malc.org[jgonzalez@malc.org]	ireyes@malc.org[ireyes@malc.org]; juresti@malc.org[juresti@malc.org]	9/15/2021 8:46	Privileged
gutierrez v. abbott.msg	Jose[garzpalm@aol.com]	rafael.anchia@civitascapital.com[rafael.anchia@civitascapital.com]	ireyes@malc.org[ireyes@malc.org]; juresti@malc.org[juresti@malc.org]	9/1/2021 12:08	Privileged
HDC Redistricting Briefing Next Wednesday.msg	Chris Turner[chair@texashousedems.com]	ireyes@malc.org[ireyes@malc.org]		9/2/2021 8:43	Privileged
Incumbent addresses.msg	Joaquin Gonzalez[jgonzalez@malc.org]	Jaclyn Uresti[juresti@malc.org]; Tannya Oliva[toliva@malc.org]; Irma Reyes[ireyes@malc.org]		9/4/2021 13:24	Privileged
invoice for August 31, 2021.msg	Jose[garzpalm@aol.com]	ireyes@malc.org[ireyes@malc.org]	juresti@malc.org[juresti@malc.org]	8/31/2021 11:46	Privileged
August 31, 2021 invoice.docx				8/31/2021 11:46	Privileged
joint caucus briefing on redistricting.msg	Rafael Anchia[Rafael.Ancia@house.texas.gov]	rafael.anchia@haynesboone.com[rafael.anchia@haynesboone.com]; rafa.anchia@civitascapital.com[rafael.anchia@civitascapital.com]; 'ireyes@malc.org'[ireyes@malc.org]; Jaclyn Uresti[juresti@malc.org]; Tannya Oliva[toliva@malc.org]; Abel Mulgheta[Abel.Mulgheta@house.texas.gov]; Jeff Madden_HC[Jeff.Madden_HC@house.texas.gov]		9/2/2021 15:34	Privileged
Joint Redistricting Briefing at 9AM, Sept. 8.msg	Jaclyn Uresti[juresti@malc.org]	Jaclyn Uresti[juresti@malc.org]	Joaquin Gonzalez[jgonzalez@malc.org]; Irma Reyes[ireyes@malc.org]; Tannya Oliva[toliva@malc.org]	9/7/2021 16:06	Privileged
MALC & CHC Meeting 10/4 @ 11AM re Redistricting.msg	Tannya Oliva[toliva@malc.org]	Rafael Anchia[rafael.anchia@civitascapital.com]; Mary González[mary@marygonzalez.com]; Ana Hernandez[ana15@msn.com]; Armando Martinez[amtz059@hotmail.com]; repedderodriguez@gmail.com[repedderodriguez@gmail.com]; awalle29@yahoo.com[awalle29@yahoo.com]	Irma Reyes[ireyes@malc.org]; Jaclyn Uresti[juresti@malc.org]; JJ Garza[jj.garza@house.texas.gov]; Paige Bufkin[Paige.Bufkin@house.texas.gov]; Scott Jenkins[scott.jenkins@house.texas.gov]; Summer C Luciano[SummerC.Luciano@house.texas.gov]; Rahul Sreenivasan[rahul.sreenivasan@house.texas.gov]; Ana Reyes[Ana.Reyes@house.texas.gov]	9/30/2021 17:47	Privileged

File_Name	Email_From	row	Email_CC	DateFamily	.Privileged
MALC Member Meeting 10/1 @ 3:30PM on Texas House Map.msg	Tannya Oliva[toliva@malc.org]	Tannya Oliva[toliva@malc.org]	Irma Reyes[ireyes@malc.org]; Jaclyn Uresti[juresti@malc.org]; Joaquin Gonzalez[jgonzalez@malc.org]	9/30/2021 13:31	Privileged
MALC Redistricting Counsel.msg	Jaclyn Uresti[juresti@malc.org]	Tannya Oliva[toliva@malc.org]	Irma Reyes[ireyes@malc.org]	9/8/2021 17:16	Privileged
MALC Redistricting Counsel.msg	Tannya Oliva[toliva@malc.org]	Tannya Oliva[toliva@malc.org]	Irma Reyes[ireyes@malc.org]; Jaclyn Uresti[juresti@malc.org]; Joaquin Gonzalez[jgonzalez@malc.org]	9/8/2021 17:26	Privileged
MALC Redistricting Update.msg	Jaclyn Uresti[juresti@malc.org]	Jaclyn Uresti[juresti@malc.org]	Irma Reyes[ireyes@malc.org]; Tannya Oliva[toliva@malc.org]; Joaquin Gonzalez[jgonzalez@malc.org]	9/17/2021 17:04	Privileged
MALC Redistricting Update.msg	Ana Hernandez, MALC Legal Counsel[info@malc.org]	Mexican American Legislative Caucus MALC[info@malc.org]; ana15@msn.com[ana15@msn.com]		9/16/2021 16:51	Privileged
MALC v. Abbott - redistricting 2011, fees.msg	Jose[garzpalm@aol.com]	ireyes@malc.org[ireyes@malc.org]; juresti@malc.org[juresti@malc.org]; rafael.anchia@civitascapital.com[rafael.anchia@civitascapital.com]		7/14/2021 16:57	Privileged
Meeting Request.msg	Tannya Oliva[toliva@malc.org]	jared.may@tlc.texas.gov[jared.may@tlc.texas.gov]; jeff.archer@tlc.texas.gov[jeff.archer@tlc.texas.gov]; jgonzalez@malc.org[jgonzalez@malc.org]	Jaclyn Uresti[juresti@malc.org]; Irma Reyes[ireyes@malc.org]	9/1/2021 14:12	Privileged
Meetings .msg	Rafael Anchia[rafael.anchia@civitascapital.com]	Ana Reyes[anareyes.tbtx@gmail.com]; Joaquin Gonzalez[jgonzalez@malc.org]; Irma Reyes[ireyes@malc.org]; Tannya Oliva[toliva@malc.org]; Abel Mulugheta[amulugheta@gmail.com]; Jaclyn Uresti[juresti@malc.org]; Jeff Madden[jtmatx@gmail.com]		9/20/2021 12:13	Privileged
ndrc litigation team meeting.msg	Rafael Anchia[Rafael.Anchia@house.texas.gov]	Rafael Anchia[rafael.anchia@civitascapital.com]; 'Anchia, Rafael (Rafael.Anchia@haynesboone.com)'; Rafael.Anchia@haynesboone.com; Abel Mulugheta[Abel.Mulugheta@house.texas.gov]; Jeff Madden_HC[Jeff.Madden_HC@house.texas.gov]; juresti@malc.org[juresti@malc.org]; Irma Reyes (ireyes@malc.org)[ireyes@malc.org]; Tannya Oliva[toliva@malc.org]		9/22/2021 15:29	Privileged
NDRC Redistricting Info Tomorrow / FW: MALC Redistricting Update.msg	Rachel Wetsel[Rachel.Wetsel@house.texas.gov]	juresti@malc.org[juresti@malc.org]	ireyes@malc.org[ireyes@malc.org]; toliva@malc.org[toliva@malc.org]; jgonzalez@malc.org[jgonzalez@malc.org]	9/20/2021 15:58	Privileged
NDRC Special Session Message Guidance.msg	Jaclyn Uresti[juresti@malc.org]	Jaclyn Uresti[juresti@malc.org]	Irma Reyes[ireyes@malc.org]; Tannya Oliva[toliva@malc.org]; Joaquin Gonzalez[jgonzalez@malc.org]	9/17/2021 17:27	Privileged
overview memo.msg	Joaquin Gonzalez[jgonzalez@malc.org]	Irma Reyes[ireyes@malc.org]; Jaclyn Uresti[juresti@malc.org]; Tannya Oliva[toliva@malc.org]		9/21/2021 15:13	Privileged
Genus & Redistricting Overview v2.docx				9/21/2021 15:13	Privileged
Genus & Redistricting Overview.docx				9/21/2021 15:13	Privileged
Proposed Redistricting Budget.msg	Jaclyn Uresti[juresti@malc.org]	AH[ana15@msn.com]; Rafael Anchia[rafael.anchia@civitascapital.com]	Irma Reyes[ireyes@malc.org]; Tannya Oliva[toliva@malc.org]	9/13/2021 23:30	Privileged
Pulling map from RedAppl.msg	Joaquin Gonzalez[jgonzalez@malc.org]	Irma Reyes[ireyes@malc.org]; Tannya Oliva[toliva@malc.org]		9/8/2021 12:25	Privileged
Re: 2020 redistricting.msg	Jose[garzpalm@aol.com]	ireyes@malc.org[ireyes@malc.org]	juresti@malc.org[juresti@malc.org]	7/6/2021 16:07	Privileged
Re: 2021 redistricting atty's fees.msg	Jose[garzpalm@aol.com]	ireyes@malc.org[ireyes@malc.org]		9/17/2021 22:41	Privileged
Re: 3 judge panel.msg	Tannya Oliva[toliva@malc.org]	Joaquin Gonzalez[jgonzalez@malc.org]	Irma Reyes[ireyes@malc.org]; Jaclyn Uresti[juresti@malc.org]; Jose[garzpalm@aol.com]	9/3/2021 15:15	Privileged
Re: 3 judge panel.msg	Jose[garzpalm@aol.com]	jgonzalez@malc.org[jgonzalez@malc.org]; juresti@malc.org[juresti@malc.org]; toliva@malc.org[toliva@malc.org]; ireyes@malc.org[ireyes@malc.org]		9/3/2021 16:04	Privileged
Re: Agenda and Run of Show for Tomorrow's Summit.msg	Jose[garzpalm@aol.com]	ireyes@malc.org[ireyes@malc.org]		7/6/2021 15:15	Privileged
Re: Attached: Sample Engagement Letter.msg	Jaclyn Uresti[juresti@malc.org]	Rafael Anchia[rafael.anchia@civitascapital.com]	Ana Hernandez[ana15@msn.com]; Irma Reyes[ireyes@malc.org]	9/7/2021 20:38	Privileged

File_Name	Email_From	row	Email_CC	DateFamily	.Privileged
Re: Attached: Sample Engagement Letter.msg	Ana Hernandez[ana15@msn.com]	Jaclyn Uresti[juresti@malc.org]	Rafael Anchia[rafael.anchia@civitascapital.com]; Irma Reyes[ireyes@malc.org]	9/7/2021 21:10	Privileged
Re: Attached: Sample Engagement Letter.msg	Jaclyn Uresti[juresti@malc.org]	Rafael Anchia[rafael.anchia@civitascapital.com]	Ana Hernandez[ana15@msn.com]; Irma Reyes[ireyes@malc.org]	8/30/2021 17:09	Privileged
Re: Attached: Sample Engagement Letter.msg	Rafael Anchia[rafael.anchia@civitascapital.com]	Jaclyn Uresti[juresti@malc.org]	Ana Hernandez[ana15@msn.com]; Irma Reyes[ireyes@malc.org]	8/30/2021 17:33	Privileged
Re: Attached: Sample Engagement Letter.msg	Ana Hernandez[ana15@msn.com]	Jaclyn Uresti[juresti@malc.org]	Rafael Anchia[rafael.anchia@civitascapital.com]; Irma Reyes[ireyes@malc.org]	8/30/2021 16:40	Privileged
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Re: Attached: Sample Engagement Letter.msg	Rafael Anchia[rafael.anchia@civitascapital.com]	Ana Hernandez[ana15@msn.com]	Jaclyn Uresti[juresti@malc.org]; Irma Reyes[ireyes@malc.org]	8/30/2021 16:45	Privileged
Re: Attached: Sample Engagement Letter.msg	Jaclyn Uresti[juresti@malc.org]	Rafael Anchia[rafael.anchia@civitascapital.com]	AH[ana15@msn.com]; Irma Reyes[ireyes@malc.org]	8/30/2021 16:13	Privileged
Re: Attached: Sample Engagement Letter.msg	Rafael Anchia[rafael.anchia@civitascapital.com]	Jaclyn Uresti[juresti@malc.org]	AH[ana15@msn.com]; Irma Reyes[ireyes@malc.org]	8/30/2021 15:58	Privileged
Re: Attached: Sample Engagement Letter.msg	Jaclyn Uresti[juresti@malc.org]	Rafael Anchia[rafael.anchia@civitascapital.com]	Ana Hernandez[ana15@msn.com]; Irma Reyes[ireyes@malc.org]	8/30/2021 17:11	Privileged
Re: Attorneys' fees and costs motion.msg	Lorraine Garcia[lorraine.margar@gmail.com]	Irma Reyes[ireyes@malc.org]		8/12/2021 9:56	Privileged
Re: Attorneys' fees and costs motion.msg	Lorraine Garcia[lorraine.margar@gmail.com]	Irma Reyes[ireyes@malc.org]		8/11/2021 11:04	Privileged
Re: Attorneys' fees and costs motion.msg	Lorraine Garcia[lorraine.margar@gmail.com]	Irma Reyes[ireyes@malc.org]		8/10/2021 18:56	Privileged
Re: Attorneys' fees and costs motion.msg	Lorraine Garcia[lorraine.margar@gmail.com]	Irma Reyes[ireyes@malc.org]		8/10/2021 16:24	Privileged
Re: Attorneys' fees and costs motion.msg	Lorraine Garcia[lorraine.margar@gmail.com]	Irma Reyes[ireyes@malc.org]		8/5/2021 10:38	Privileged
Re: CALL REQUEST W/ANCHIA: REDISTRICTING COUSEL.msg	Jaclyn Uresti[juresti@malc.org]	Joaquin Gonzalez[joaquin@texascivilrightsproject.org]	Tannya Oliva[toliva@malc.org]; Irma Reyes[ireyes@malc.org]	8/28/2021 19:17	Privileged
Re: CALL REQUEST W/ANCHIA: REDISTRICTING COUSEL.msg	Joaquin Gonzalez[joaquin@texascivilrightsproject.org]	Tannya Oliva[toliva@malc.org]	Irma Reyes[ireyes@malc.org]; Jaclyn Uresti[juresti@malc.org]	8/28/2021 17:34	Privileged
Re: CALL REQUEST W/ANCHIA: REDISTRICTING COUSEL.msg	Tannya Oliva[toliva@malc.org]	Joaquin Gonzalez[joaquin@texascivilrightsproject.org]	Irma Reyes[ireyes@malc.org]; Jaclyn Uresti[juresti@malc.org]	8/25/2021 11:32	Privileged
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Re: CALL REQUEST W/ANCHIA: REDISTRICTING COUSEL.msg	Tannya Oliva[toliva@malc.org]	Joaquin Gonzalez[joaquin@texascivilrightsproject.org]	James Slattery[james@texascivilrightsproject.org]; Irma Reyes[ireyes@malc.org]; Jaclyn Uresti[juresti@malc.org]	8/25/2021 11:00	Privileged
Re: CALL REQUEST W/ANCHIA: REDISTRICTING COUSEL.msg	Tannya Oliva[toliva@malc.org]	Ana Reyes[Ana.Reyes@house.texas.gov]	Irma Reyes[ireyes@malc.org]	8/25/2021 10:58	Privileged
Re: CALL REQUEST W/ANCHIA: REDISTRICTING COUSEL.msg	Joaquin Gonzalez[joaquin@texascivilrightsproject.org]	Tannya Oliva[toliva@malc.org]	Irma Reyes[ireyes@malc.org]; Jaclyn Uresti[juresti@malc.org]	8/25/2021 11:39	Privileged
Re: CALL REQUEST W/ANCHIA: REDISTRICTING COUSEL.msg	Tannya Oliva[toliva@malc.org]	Joaquin Gonzalez[joaquin@texascivilrightsproject.org]	Irma Reyes[ireyes@malc.org]; Jaclyn Uresti[juresti@malc.org]	8/25/2021 12:24	Privileged
Re: CALL REQUEST W/ANCHIA: REDISTRICTING COUSEL.msg	Joaquin Gonzalez[joaquin@texascivilrightsproject.org]	Tannya Oliva[toliva@malc.org]	James Slattery[james@texascivilrightsproject.org]; Irma Reyes[ireyes@malc.org]; Jaclyn Uresti[juresti@malc.org]	8/20/2021 17:19	Privileged
Re: CANCELLED: MALC Meeting Upon Adj..msg	Terry Meza[mezalaw@gmail.com]	Irma Reyes[ireyes@malc.org]		9/20/2021 13:17	Privileged
Re: Chairs Redistricting Meeting Saturday.msg	Jaclyn Uresti[juresti@malc.org]	Irma Reyes[ireyes@malc.org]		9/17/2021 13:34	Privileged
Re: Connecting you to MALC's new in-house counsel.msg	Jose[garzpalm@aol.com]	jgonzalez@malc.org[jgonzalez@malc.org]; toliva@malc.org[toliva@malc.org]	ireyes@malc.org[ireyes@malc.org]; juresti@malc.org[juresti@malc.org]	9/1/2021 16:37	Privileged
Re: Connecting you to MALC's new in-house counsel.msg	Joaquin Gonzalez[jgonzalez@malc.org]	Tannya Oliva[toliva@malc.org]	Irma Reyes[ireyes@malc.org]; Jose[garzpalm@aol.com]; juresti@malc.org[juresti@malc.org]	9/1/2021 15:21	Privileged
Re: Connecting you to MALC's new in-house counsel.msg	Tannya Oliva[toliva@malc.org]	Irma Reyes[ireyes@malc.org]	jgonzalez@malc.org[jgonzalez@malc.org]; juresti@malc.org[juresti@malc.org]	9/1/2021 15:18	Privileged
Re: Connecting you to MALC's new in-house counsel.msg	Jose[garzpalm@aol.com]	jgonzalez@malc.org[jgonzalez@malc.org]; toliva@malc.org[toliva@malc.org]; ireyes@malc.org[ireyes@malc.org]	juresti@malc.org[juresti@malc.org]; ireyes@malc.org[ireyes@malc.org]	9/1/2021 14:35	Privileged
Re: Connecting you to MALC's new in-house counsel.msg	Jose[garzpalm@aol.com]	jgonzalez@malc.org[jgonzalez@malc.org]	juresti@malc.org[juresti@malc.org]; ireyes@malc.org[ireyes@malc.org]	9/1/2021 14:31	Privileged

MALC PRIVILEGE LOG

File_Name	Email_From	row	Email_CC	DateFamily	.Privileged
Re: DRAFT email to MALC Members & Ltr. to Chairman Hunter.msg	Jaclyn Uresti[juresti@malc.org]	Rafael Anchia[rafael.anchia@civitascapital.com]	Ana Hernandez[ana15@msn.com]; Irma Reyes[ireyes@malc.org]; Tannya Oliva[toliva@malc.org]	9/16/2021 14:15	Privileged
Re: DRAFT email to MALC Members & Ltr. to Chairman Hunter.msg	Ana Hernandez[ana15@msn.com]	Jaclyn Uresti[juresti@malc.org]	Rafael Anchia[rafael.anchia@civitascapital.com]; Irma Reyes[ireyes@malc.org]; Tannya Oliva[toliva@malc.org]	9/16/2021 15:02	Privileged
Re: DRAFT email to MALC Members & Ltr. to Chairman Hunter.msg	Rafael Anchia[rafael.anchia@civitascapital.com]	Jaclyn Uresti[juresti@malc.org]	Ana Hernandez[ana15@msn.com]; Irma Reyes[ireyes@malc.org]; Tannya Oliva[toliva@malc.org]	9/16/2021 14:11	Privileged
Re: DRAFT email to MALC Members & Ltr. to Chairman Hunter.msg	Rafael Anchia[rafael.anchia@civitascapital.com]	Jaclyn Uresti[juresti@malc.org]	Ana Hernandez[ana15@msn.com]; Irma Reyes[ireyes@malc.org]; Tannya Oliva[toliva@malc.org]	9/16/2021 14:10	Privileged
Re: DRAFT email to MALC Members & Ltr. to Chairman Hunter.msg	Rafael Anchia[rafael.anchia@civitascapital.com]	Jaclyn Uresti[juresti@malc.org]	AH[ana15@msn.com]; Irma Reyes[ireyes@malc.org]; Tannya Oliva[toliva@malc.org]	9/16/2021 9:06	Privileged
Re: DRAFT email to MALC Members & Ltr. to Chairman Hunter.msg	Ana Hernandez[ana15@msn.com]	Rafael Anchia[rafael.anchia@civitascapital.com]; Jaclyn Uresti[juresti@malc.org]	Irma Reyes[ireyes@malc.org]; Tannya Oliva[toliva@malc.org]	9/16/2021 9:51	Privileged
Re: DRAFT email to MALC Members & Ltr. to Chairman Hunter.msg	Rafael Anchia[rafael.anchia@civitascapital.com]	Ana Hernandez[ana15@msn.com]	Jaclyn Uresti[juresti@malc.org]; Irma Reyes[ireyes@malc.org]; Tannya Oliva[toliva@malc.org]	9/16/2021 15:20	Privileged
Re: DRAFT email to MALC Members & Ltr. to Chairman Hunter.msg	Jaclyn Uresti[juresti@malc.org]	Ana Hernandez[ana15@msn.com]	Rafael Anchia[rafael.anchia@civitascapital.com]; Irma Reyes[ireyes@malc.org]; Tannya Oliva[toliva@malc.org]	9/16/2021 13:04	Privileged
Re: DRAFT for Rep. Hernandez - Redistricting Update - Timeline & Legal Resources.msg	Tannya Oliva[toliva@malc.org]	Jaclyn Uresti[juresti@malc.org]	Irma Reyes[ireyes@malc.org]	9/15/2021 17:06	Privileged
Re: Email from Dr. Potter.msg	Jose[garzpalm@aol.com]	rafael.anchia@civitascapital.com[rafael.anchia@civitascapital.com]	juresti@malc.org[juresti@malc.org]; ireyes@malc.org[ireyes@malc.org]	7/9/2021 10:17	Privileged
Re: Email from Dr. Potter.msg	Rafael Anchia[rafael.anchia@civitascapital.com]	Jose[garzpalm@aol.com]	juresti@malc.org[juresti@malc.org]; ireyes@malc.org[ireyes@malc.org]	7/9/2021 10:22	Privileged
RE: Example Attorney fees filing & Announcing Counsel.msg	Tex Quesada[Quesada@textrial.com]	Irma Reyes[ireyes@malc.org]	Jaclyn Uresti[juresti@malc.org]; Sean McCaffity[SMcCaffity@textrial.com]; Dana Chandler[DChandler@textrial.com]; Nicole Pioli[npioli@textrial.com]	9/9/2021 14:06	Privileged
RE: Example Attorney fees filing & Announcing Counsel.msg	Tex Quesada[Quesada@textrial.com]	Irma Reyes[ireyes@malc.org]	Jaclyn Uresti[juresti@malc.org]; Sean McCaffity[SMcCaffity@textrial.com]; Dana Chandler[DChandler@textrial.com]; Nicole Pioli[npioli@textrial.com]	9/7/2021 17:41	Privileged
Re: Example Attorney fees filing & Announcing Counsel.msg	Jaclyn Uresti[juresti@malc.org]	Tex Quesada[Quesada@textrial.com]	Irma Reyes[ireyes@malc.org]; Sean McCaffity[SMcCaffity@textrial.com]; Dana Chandler[DChandler@textrial.com]; Nicole Pioli[npioli@textrial.com]	9/7/2021 20:00	Privileged
RE: Example Attorney fees filing & Announcing Counsel.msg	Tex Quesada[Quesada@textrial.com]	Jaclyn Uresti[juresti@malc.org]; Sean McCaffity[SMcCaffity@textrial.com]	Irma Reyes[ireyes@malc.org]; Dana Chandler[DChandler@textrial.com]; Nicole Pioli[npioli@textrial.com]	9/7/2021 17:26	Privileged
RE: Example Attorney fees filing & Announcing Counsel.msg	Tex Quesada[Quesada@textrial.com]	Jaclyn Uresti[juresti@malc.org]; Sean McCaffity[SMcCaffity@textrial.com]	Irma Reyes[ireyes@malc.org]; Dana Chandler[DChandler@textrial.com]; Nicole Pioli[npioli@textrial.com]	9/7/2021 17:23	Privileged
Re: Example Attorney fees filing & Announcing Counsel.msg	Jaclyn Uresti[juresti@malc.org]	Tex Quesada[quesada@textrial.com]; Sean McCaffity[SMcCaffity@textrial.com]	Irma Reyes[ireyes@malc.org]	9/2/2021 16:11	Privileged
Re: Gutierrez Litigation.msg	Joaquin Gonzalez[jgonzalez@malc.org]	Irma Reyes[ireyes@malc.org]	Jose[garzpalm@aol.com]; Jaclyn Uresti[juresti@malc.org]	9/16/2021 6:57	Privileged
Re: Gutierrez Litigation.msg	Joaquin Gonzalez[jgonzalez@malc.org]	Jose[garzpalm@aol.com]	quesada@textrial.com[quesada@textrial.com]; smccaffity@textrial.com[smccaffity@textrial.com]; ireyes@malc.org[ireyes@malc.org]; juresti@malc.org[juresti@malc.org]	9/15/2021 13:38	Privileged
Re: gutierrez v. abbott.msg	Rafael Anchia[rafael.anchia@civitascapital.com]	Jose[garzpalm@aol.com]	ireyes@malc.org[ireyes@malc.org]; juresti@malc.org[juresti@malc.org]	9/1/2021 12:13	Privileged
Re: Incumbent addresses.msg	Jaclyn Uresti[juresti@malc.org]	Tannya Oliva[toliva@malc.org]	Joaquin Gonzalez[jgonzalez@malc.org]; Irma Reyes[ireyes@malc.org]	9/5/2021 18:10	Privileged
Re: Incumbent addresses.msg	Tannya Oliva[toliva@malc.org]	Joaquin Gonzalez[jgonzalez@malc.org]	Irma Reyes[ireyes@malc.org]; Jaclyn Uresti[juresti@malc.org]	9/4/2021 16:16	Privileged
Re: MALC 990.msg	Jose[garzpalm@aol.com]	ireyes@malc.org[ireyes@malc.org]		8/12/2021 12:44	Privileged
Re: MALC 990.msg	Jose[garzpalm@aol.com]	ireyes@malc.org[ireyes@malc.org]		8/12/2021 11:16	Privileged
Re: MALC Redistricting Update.msg	Ana Hernandez[ana15@msn.com]	Penny Shaw[pennyshawtx@gmail.com]	Ana Hernandez, MALC Legal Counsel[info@malc.org]	9/17/2021 7:13	Privileged
Re: MALC Redistricting Update.msg	Elizabeth 'Liz' Campos[liz@lizcampos.com]	Ana Hernandez, MALC Legal Counsel[info@malc.org]		9/17/2021 8:37	Privileged
Re: MALC Redistricting Update.msg	Penny Shaw[pennyshawtx@gmail.com]	Ana Hernandez, MALC Legal Counsel[info@malc.org]	ana15@msn.com[ana15@msn.com]	9/16/2021 19:33	Privileged
Re: Population Report with Estimates.msg	Jose[garzpalm@aol.com]	ireyes@malc.org[ireyes@malc.org]		6/30/2021 18:14	Privileged

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Re: redistricting fees.msg	Jaclyn Uresti[juresti@malc.org]	Jose[garzpalm@aol.com]	ireyes@malc.org[ireyes@malc.org]	9/29/2021 19:58	Privileged
Re: Released Texas House Maps.msg	Tannya Oliva[toliva@malc.org]	Tex Quesada[Quesada@texttrial.com]	jgonzalez@malc.org[jgonzalez@malc.org]; rafael.anchia@civitascapital.com[rafael.anchia@civitascapital.com]; Sean McCaffity[SMcCaffity@textrial.com]; Nicole Pioli[npioli@textrial.com]; juresti@malc.org[juresti@malc.org]; ireyes@malc.org[ireyes@malc.org]	9/30/2021 14:51	Privileged
RE: Released Texas House Maps.msg	Tex Quesada[Quesada@textrial.com]	Tannya Oliva[toliva@malc.org]	jgonzalez@malc.org[jgonzalez@malc.org]; rafael.anchia@civitascapital.com[rafael.anchia@civitascapital.com]; Sean McCaffity[SMcCaffity@textrial.com]; Nicole Pioli[npioli@textrial.com]; juresti@malc.org[juresti@malc.org]; ireyes@malc.org[ireyes@malc.org]	9/30/2021 13:50	Privileged
Re: Released Texas House Maps.msg	Joaquin Gonzalez[jgonzalez@malc.org]	Tannya Oliva[toliva@malc.org]	Tex Quesada[Quesada@textrial.com]; Rafael Anchia[rafael.anchia@civitascapital.com]; Jose[garzpalm@aol.com]; Sean McCaffity[SMcCaffity@textrial.com]; npioli@textrial.com[npioli@textrial.com]; Jaclyn Uresti[juresti@malc.org]; Irma Reyes[ireyes@malc.org]	9/30/2021 11:25	Privileged
Re: Representation request for MALC.msg	Jaclyn Uresti[juresti@malc.org]	Rafael Anchia[rafael.anchia@civitascapital.com]	Irma Reyes[ireyes@malc.org]; Ana Hernandez[ana15@msn.com]	8/18/2021 22:01	Privileged
Re: Representation request for MALC.msg	Ana Hernandez[ana15@msn.com]	Rafael Anchia[rafael.anchia@civitascapital.com]	Jaclyn Uresti[juresti@malc.org]; Irma Reyes [ireyes@malc.org][ireyes@malc.org]	8/17/2021 18:15	Privileged
Re: Representation request for MALC.msg	Rafael Anchia[rafael.anchia@civitascapital.com]	Irma Reyes[ireyes@malc.org]		8/17/2021 18:40	Privileged
Re: Representation request for MALC.msg	Rafael Anchia[rafael.anchia@civitascapital.com]	Irma Reyes[ireyes@malc.org]	Ana Hernandez[ana15@msn.com]; Jaclyn Uresti[juresti@malc.org]	8/17/2021 18:31	Privileged
Re: Representation request for MALC.msg	Rafael Anchia[rafael.anchia@civitascapital.com]	Ana Hernandez[ana15@msn.com]	Jaclyn Uresti[juresti@malc.org]; Irma Reyes [ireyes@malc.org][ireyes@malc.org]	8/17/2021 18:23	Privileged
Re: sample engagement K on redistricting.msg	Jose[garzpalm@aol.com]	ireyes@malc.org[ireyes@malc.org]	juresti@malc.org[juresti@malc.org]	8/25/2021 15:08	Privileged
Re: sample engagement K on redistricting.msg	Jose[garzpalm@aol.com]	ireyes@malc.org[ireyes@malc.org]	juresti@malc.org[juresti@malc.org]	8/25/2021 16:29	Privileged
Re: SB13 (primaries).msg	Jose[garzpalm@aol.com]	ireyes@malc.org[ireyes@malc.org]	toliva@malc.org[toliva@malc.org]	8/25/2021 14:37	Privileged
Re: Scheduling Availability & Costs Attachment.msg	Jose[garzpalm@aol.com]	ireyes@malc.org[ireyes@malc.org]		8/18/2021 11:31	Privileged
Re: Scheduling Availability & Costs Attachment.msg	Jose[garzpalm@aol.com]	ireyes@malc.org[ireyes@malc.org]		8/17/2021 15:42	Privileged
Re: Scheduling Availability & Costs Attachment.msg	Jose[garzpalm@aol.com]	ireyes@malc.org[ireyes@malc.org]		8/17/2021 17:02	Privileged
Re: Senate Redistricting Lawsuit.msg	Jose[garzpalm@aol.com]	toliva@malc.org[toliva@malc.org]	ireyes@malc.org[ireyes@malc.org]	9/1/2021 10:56	Privileged
Re: Senate Redistricting Lawsuit.msg	Tannya Oliva[toliva@malc.org]	Jose[garzpalm@aol.com]	ireyes@malc.org[ireyes@malc.org]	9/1/2021 11:10	Privileged
Re: spreadsheets for House plan.msg	Joaquin Gonzalez[jgonzalez@malc.org]	Sean McCaffity[SMcCaffity@textrial.com]	Tex Quesada[Quesada@textrial.com]; Jose[garzpalm@aol.com]; Rafa Anchia[rafaanchia@gmail.com]; Jaclyn Uresti[juresti@malc.org]; Tannya Oliva[toliva@malc.org]; Irma Reyes[ireyes@malc.org]	9/30/2021 19:00	Privileged
Redistricting 2011 fees.msg	Jose[garzpalm@aol.com]	ireyes@malc.org[ireyes@malc.org]; juresti@malc.org[juresti@malc.org]		8/7/2021 10:53	Privileged
redistricting 2021 invoice.msg	Jose[garzpalm@aol.com]	ireyes@malc.org[ireyes@malc.org]; juresti@malc.org[juresti@malc.org]		8/2/2021 11:50	Privileged
July 31, 2021 invoice.docx				8/2/2021 11:50	Privileged
redistricting atty's fees.msg	Jose[garzpalm@aol.com]	ireyes@malc.org[ireyes@malc.org]; toliva@malc.org[toliva@malc.org]		9/17/2021 16:58	Privileged
SUMMARY OF MALC FEES AND COSTS.docx				9/17/2021 16:58	Privileged
Redistricting fees.msg	Jose[garzpalm@aol.com]	ireyes@malc.org[ireyes@malc.org]	juresti@malc.org[juresti@malc.org]	9/29/2021 18:17	Privileged
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irma reyes dec.docx				9/29/2021 18:17	Privileged
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MALC Exp ert.docx				9/29/2021 18:17	Privileged
redistricting fees.msg	Jose[garzpalm@aol.com]	ireyes@malc.org[ireyes@malc.org]; juresti@malc.org[juresti@malc.org]		9/29/2021 18:24	Privileged

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sample engagement K on redistricting.msg	Jose[garzpalm@aol.com]	juresti@malc.org[juresti@malc.org]; ireyes@malc.org[ireyes@malc.org]		8/25/2021 12:59	Privileged
SB 7 closing and cases.msg	Abel Mulugheta[amulugheta@gmail.com]	Jaclyn Uresti[juresti@malc.org]; Tannya Oliva[toliva@malc.org]; Irma Reyes[ireyes@malc.org]		8/25/2021 21:14	Privileged
SB7 Closing Speech.docx				8/25/2021 21:14	Privileged
TX COURT CASES.docx				8/25/2021 21:14	Privileged
Senate Redistricting Lawsuit.msg	Tannya Oliva[toliva@malc.org]	Jose[garzpalm@aol.com]	Irma Reyes[ireyes@malc.org]	9/1/2021 10:48	Privileged
Senate's SBOE proposal.msg	Joaquin Gonzalez[jgonzalez@malc.org]	Rafael Anchia[rafael.anchia@civitascapital.com]; Jaclyn Uresti[juresti@malc.org]; Irma Reyes[ireyes@malc.org]; Tannya Oliva[toliva@malc.org]; Jose[garzpalm@aol.com]; Sean McCaffity[SMcCaffity@textrial.com]; Tex Quesada[Quesada@textrial.com]		9/21/2021 0:43	Privileged
Thursday Redistricting Caucus Chair Meeting.msg	caratxhdc@gmail.com[caratxhdc@gmail.com]		Irma Reyes[ireyes@malc.org]; Jaclyn Uresti[juresti@malc.org]; Phillip Martin[philliptxhdc@gmail.com]; Marc Hoskins[mhoskins@txlbc.org]; Daniel.Clayton@house.texas.gov[Daniel.Clayton@house.texas.gov]; nicolas.kalla@house.texas.gov[nicolas.kalla@house.texas.gov]	9/14/2021 15:19	Privileged
Time to review things with Chair.msg	Joaquin Gonzalez[jgonzalez@malc.org]	Tannya Oliva[toliva@malc.org]; Irma Reyes[ireyes@malc.org]; Jaclyn Uresti[juresti@malc.org]		9/13/2021 14:29	Privileged
Time to talk?.msg	Joaquin Gonzalez[jgonzalez@malc.org]	nperales@maldef.org[nperales@maldef.org]; fmenendez@maldef.org[fmenendez@maldef.org]; juresti@malc.org[juresti@malc.org]; Irma Reyes[ireyes@malc.org]; Tannya Oliva[toliva@malc.org]		9/16/2021 11:27	Privileged
to be rescheduled for next week: rma joins zoom with ndrc.msg	Rafael Anchia[Rafael.Ancia@house.texas.gov]	rafael.anchia@civitascapital.com[rafael.anchia@civitascapital.com]; rafael.anchia@haynesboone.com[rafael.anchia@haynesboone.com]; 'ireyes@malc.org'[ireyes@malc.org]; Tannya Oliva[toliva@malc.org]; Jaclyn Uresti[juresti@malc.org]		8/11/2021 14:58	Privileged
TOMORROW: HDC Redistricting Briefing.msg	Cara Santucci[caratxhdc@gmail.com]		Jaclyn Uresti[juresti@malc.org]; Phillip Martin[philliptxhdc@gmail.com]; Marc Hoskins[mhoskins@txlbc.org]	9/7/2021 15:05	Privileged
Update on MALC Redistricting Counsel.msg	Jaclyn Uresti[juresti@malc.org]	Rafael Anchia[rafael.anchia@civitascapital.com]; AH[ana15@msn.com]; Armando Walle[awalle29@yahoo.com]; Mary González[mary@maryegonzalez.com]; Mando Martinez[amtz059@hotmail.com]; Eddie Rodriguez[repeddierodriguez@gmail.com]	Irma Reyes[ireyes@malc.org]; Tannya Oliva[toliva@malc.org]	9/8/2021 8:03	Privileged
UPDATE: Chairs Redistricting Meeting Saturday.msg	caratxhdc@gmail.com[caratxhdc@gmail.com]			9/18/2021 12:27	Privileged
10.4.21 RMA Qs for House Redistricting Committee Hearing.msg	Christian Vieira (Google Docs)[comments-noreply@docs.google.com]	ireyes@malc.org[ireyes@malc.org]		10/3/2021 13:41	Privileged
10.4.21 RMA Qs for House Redistricting Committee Hearing.msg	Christian Vieira (Google Docs)[comments-noreply@docs.google.com]	ireyes@malc.org[ireyes@malc.org]		10/3/2021 16:05	Privileged
Non Retrogression Map Reports.msg	Cara Santucci[caratxhdc@gmail.com]	Joaquin Gonzalez[jgonzalez@malc.org]	Irma Reyes[ireyes@malc.org]; Jaclyn Uresti[juresti@malc.org]	9/30/2021 16:34	Privileged
Re: Materials.msg	Irma Reyes[ireyes@malc.org]	Christian Vieira[cvieira@malc.org]	Tannya Oliva[toliva@malc.org]; Jaclyn Uresti[juresti@malc.org]	10/1/2021 19:10	Privileged
Re: Materials.msg	Christian Vieira[cvieira@malc.org]	Tannya Oliva[toliva@malc.org]	Irma Reyes[ireyes@malc.org]; Jaclyn Uresti[juresti@malc.org]	10/1/2021 19:05	Privileged
10AM Breifing Zoom Link.msg	Irma Reyes[ireyes@malc.org]	Jose[garzpalm@aol.com]	Tannya Oliva[toliva@malc.org]	7/1/2021 8:38	Privileged
11am Zoom with Chair Anchia.msg	Irma Reyes[ireyes@malc.org]	Jose[garzpalm@aol.com]; Joaquin Gonzalez[jgonzalez@malc.org]	Jaclyn Uresti[juresti@malc.org]; Tannya Oliva[toliva@malc.org]	9/8/2021 10:41	Privileged
9am Redistricting Briefing for Members Tomorrow.msg	Irma Reyes[ireyes@malc.org]	Jose[garzpalm@aol.com]; Joaquin Gonzalez[jgonzalez@malc.org]		9/7/2021 15:55	Privileged
Attached: Sample Engagement Letter.msg	Irma Reyes[ireyes@malc.org]	Tex Quesada[quesada@textrial.com]; Sean McCaffity[SMcCaffity@textrial.com]	Ana Hernandez[ana15@msn.com]; Rafael Anchia[rafael.anchia@civitascapital.com]; Jose[garzpalm@aol.com]; Jaclyn Uresti[juresti@malc.org]	8/25/2021 17:07	Privileged

File_Name	Email_From	row	Email_CC	DateFamily	.Privileged
Confidential plan .msg	Irma Reyes[ireyes@malc.org]	Rafael Anchia[rafael.anchia@civitascapital.com]; Ana Hernandez[ana15@msn.com]; Armando Walle[awalle29@yahoo.com]	Tannya Oliva[toliva@malc.org]; Jaclyn Uresti[juresti@malc.org]	8/9/2021 16:52	Privileged
Fwd: Attached: Sample Engagement Letter.msg	Irma Reyes[ireyes@malc.org]	joaquinrobertgonzalez@gmail.com[joaquinrobertgonzalez@gmail.com]		9/1/2021 13:48	Privileged
Fwd: Attorneys' fees and costs motion.msg	Irma Reyes[ireyes@malc.org]	Lorraine Garcia[lorraine.margar@gmail.com]		8/5/2021 10:30	Privileged
Fwd: Chairs Redistricting Meeting Saturday.msg	Irma Reyes[ireyes@malc.org]	Jaclyn Uresti[juresti@malc.org]		9/17/2021 13:25	Privileged
Fwd: Committee Notice Alert for Redistricting.msg	Irma Reyes[ireyes@malc.org]	Jaclyn Uresti[juresti@malc.org]; Tannya Oliva[toliva@malc.org]; Joaquin Gonzalez[jgonzalez@malc.org]; Jose[garzpalm@aol.com]; Sean McCaffity[SMcCaffity@textrial.com]; Tex Quesada[quesada@textrial.com]; Rafael Anchia[rafael.anchia@civitascapital.com]		9/30/2021 12:18	Privileged
Fwd: gutierrez v. abbott.msg	Irma Reyes[ireyes@malc.org]	Joaquin Gonzalez[joaquinrobertgonzalez@gmail.com]		9/1/2021 14:43	Privileged
Fwd: Perez, et al. v. State of Texas, et al. -- Perez Plaintiffs' Attorneys' Fees and Expenses.msg	Irma Reyes[ireyes@malc.org]	Jaclyn Uresti[juresti@malc.org]; Tannya Oliva[toliva@malc.org]		9/9/2021 12:22	Privileged
AVILA TIME RECORDS.pdf				9/9/2021 12:22	Privileged
DCM_time records_(5.22.12_-_6.29.13).pdf				9/9/2021 12:22	Privileged
DCM_time records_(6.26.13_-_7.1.13).pdf				9/9/2021 12:22	Privileged
DCM_Time Records_(7.8.11_-_5.22.12).pdf				9/9/2021 12:22	Privileged
LISTING OF TIME ENTRIES AND SERVICES for CYNTHIA JONES.pdf				9/9/2021 12:22	Privileged
MALC Expert costs, through Jan. 2012.pdf				9/9/2021 12:22	Privileged
MALC Redistricting Costs (Autosaved).xlsx				9/9/2021 12:22	Privileged
MARTIN GOLANDO TIME RECORDS PEREZ V.pdf				9/9/2021 12:22	Privileged
Time Records - GARZA (2010-2019).pdf				9/9/2021 12:22	Privileged
Fwd: Redistricting fees.msg	Irma Reyes[ireyes@malc.org]	Jaclyn Uresti[juresti@malc.org]		9/30/2021 15:29	Privileged
2014.costs.docx				9/30/2021 15:29	Privileged
irma reyes dec.docx				9/30/2021 15:29	Privileged
MALC COSTS 2014.docx				9/30/2021 15:29	Privileged
MALC Exp ert.docx				9/30/2021 15:29	Privileged
POTENTIAL QUESTIONS FOR DR. Potter and Jeff Archer in redistricting hearing on Bexar and El Paso.docx				7/6/2021 15:19	Privileged
Re: 2021 redistricting atty's fees.msg	Irma Reyes[ireyes@malc.org]	Jose[garzpalm@aol.com]		9/17/2021 20:40	Privileged
Redistricting Costs (Autosaved).xlsx				9/17/2021 20:40	Privileged
Re: 2021 redistricting atty's fees.msg	Irma Reyes[ireyes@malc.org]	Jose[garzpalm@aol.com]		9/17/2021 20:21	Privileged
Re: Attorneys' fees and costs motion.msg	Irma Reyes[ireyes@malc.org]	Jose[garzpalm@aol.com]	juresti@malc.org[juresti@malc.org]	8/10/2021 18:05	Privileged
Re: Attorneys' fees and costs motion.msg	Irma Reyes[ireyes@malc.org]	Lorraine Garcia[lorraine.margar@gmail.com]		8/10/2021 18:04	Privileged
Re: Attorneys' fees and costs motion.msg	Irma Reyes[ireyes@malc.org]	Lorraine Garcia[lorraine.margar@gmail.com]		8/11/2021 10:52	Privileged
Re: DRAFT for Rep. Hernandez - Redistricting Update - Timeline & Legal Resources.msg	Irma Reyes[ireyes@malc.org]	Tannya Oliva[toliva@malc.org]	Jaclyn Uresti[juresti@malc.org]	9/15/2021 23:34	Privileged
Re: Example Attorney fees filing & Announcing Counsel.msg	Irma Reyes[ireyes@malc.org]	Tex Quesada[Quesada@textrial.com]	Jaclyn Uresti[juresti@malc.org]; Sean McCaffity[SMcCaffity@textrial.com]; Dana Chandler[DChandler@textrial.com]; Nicole Pioli[npioli@textrial.com]	9/7/2021 17:30	Privileged
Re: Gutierrez Litigation.msg	Irma Reyes[ireyes@malc.org]	Joaquin Gonzalez[jgonzalez@malc.org]	Jose[garzpalm@aol.com]; juresti@malc.org[juresti@malc.org]	9/16/2021 0:02	Privileged
Re: Representation request for MALC.msg	Irma Reyes[ireyes@malc.org]	Rafael Anchia[rafael.anchia@civitascapital.com]		8/17/2021 18:40	Privileged
Re: Representation request for MALC.msg	Irma Reyes[ireyes@malc.org]	Rafael Anchia[rafael.anchia@civitascapital.com]		8/17/2021 18:32	Privileged
Re: Representation request for MALC.msg	Irma Reyes[ireyes@malc.org]	Rafael Anchia[rafael.anchia@civitascapital.com]	Ana Hernandez[ana15@msn.com]; Jaclyn Uresti[juresti@malc.org]	8/17/2021 18:30	Privileged
Re: sample engagement K on redistricting.msg	Irma Reyes[ireyes@malc.org]	Jose[garzpalm@aol.com]	juresti@malc.org[juresti@malc.org]	8/25/2021 15:01	Privileged
Re: sample engagement K on redistricting.msg	Irma Reyes[ireyes@malc.org]	Jose[garzpalm@aol.com]	juresti@malc.org[juresti@malc.org]	8/25/2021 15:50	Privileged
Re: Scheduling Availability & Costs Attachment.msg	Irma Reyes[ireyes@malc.org]	Jose[garzpalm@aol.com]		8/17/2021 16:49	Privileged

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Redistricting Update.msg	Irma Reyes[ireyes@malc.org]	Jaclyn Uresti[juresti@malc.org]; Tannya Oliva[toliva@malc.org]		9/1/2021 17:44	Privileged
SB 13 analysis.docx				8/25/2021 14:46	Privileged
March 31, 2021 invoice.docx				4/6/2021 10:20	Privileged
Feb. 28, 2021 invoice.docx				3/2/2021 14:55	Privileged
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May 31, 2021 invoice.docx				6/18/2021 10:19	Privileged
Important Message from MALDEF on the release of apportionment numbers.msg	Stephanie Swanson[steph.swanson.lwvtx@gmail.com]	undisclosed-recipients:[undisclosed-recipients:]		4/26/2021 14:22	Privileged
IPM.Note.msg	Jose[garzpalm@aol.com]	rafael.anchia@civitascapital.com[rafael.anchia@civitascapital.com]	juresti@malc.org[juresti@malc.org]; ireyes@malc.org[ireyes@malc.org]	3/29/2021 15:04	Privileged
POTENTIAL QUESTIONS FOR DR. Potter in redistricting hearing.docx				3/29/2021 15:04	Privileged
last invoice.msg	Jose[garzpalm@aol.com]	juresti@malc.org[juresti@malc.org]; ireyes@malc.org[ireyes@malc.org]		6/1/2021 13:43	Privileged
May 31, 2021 invoice.docx				6/1/2021 13:43	Privileged
lit. prep..msg	Jose[garzpalm@aol.com]	rafael.anchia@civitascapital.com[rafael.anchia@civitascapital.com]	ireyes@malc.org[ireyes@malc.org]; juresti@malc.org[juresti@malc.org]	6/1/2021 13:41	Privileged
MEMORANDUM. in anticipation of litigation.docx				6/1/2021 13:41	Privileged
Out of office Re: Meeting w Team MALC Next Week re HB6 Strategy.msg	Joaquin Gonzalez[joaquin@texascivilrightsproject.org]	ireyes@malc.org[ireyes@malc.org]		4/23/2021 14:19	Privileged
Possible HB 3013 amendment.msg	Joaquin Gonzalez[joaquin@texascivilrightsproject.org]	Jaclyn Uresti[juresti@malc.org]; Irma Reyes[ireyes@malc.org]; Tannya Oliva[toliva@malc.org]		5/13/2021 13:04	Privileged
Pre Filed Amendments SB 7.msg	Jaclyn Uresti[juresti@malc.org]	James Slattery[james@texascivilrightsproject.org]; Joaquin Gonzalez[joaquin@texascivilrightsproject.org]; Jerry Philips[jerry@philipsmeachum.com]; Kurt Meachum[kurt@philipsmeachum.com]	Tannya Oliva[toliva@malc.org]; Irma Reyes[ireyes@malc.org]; Any Ojeda[any.ojeda@house.texas.gov]	5/6/2021 10:07	Privileged
question re: budget amendment.msg	Joaquin Gonzalez[joaquin@texascivilrightsproject.org]	Jaclyn Uresti[juresti@malc.org]; Irma Reyes[ireyes@malc.org]; Lorraine Garcia[lgarcia@malc.org]		4/16/2021 9:28	Privileged
Re: 2020 redistricting.msg	Jose[garzpalm@aol.com]	lgarcia@malc.org[lgarcia@malc.org]	ireyes@malc.org[ireyes@malc.org]; juresti@malc.org[juresti@malc.org]; rafael.anchia@civitascapital.com[rafael.anchia@civitascapital.com]	4/8/2021 10:56	Privileged
POTENTIAL QUESTIONS FOR DR. Potter in redistricting hearing on East Texas.docx				4/8/2021 10:56	Privileged
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Re: 2020 redistricting.msg	Jose[garzpalm@aol.com]	lgarcia@malc.org[lgarcia@malc.org]	ireyes@malc.org[ireyes@malc.org]; juresti@malc.org[juresti@malc.org]; rafael.anchia@civitascapital.com[rafael.anchia@civitascapital.com]	4/8/2021 10:43	Privileged
POTENTIAL QUESTIONS FOR DR. Potter in redistricting hearing on East Texas.docx				4/8/2021 10:43	Privileged
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Re: 2020 redistricting.msg	Jose[garzpalm@aol.com]	lgarcia@malc.org[lgarcia@malc.org]	ireyes@malc.org[ireyes@malc.org]; juresti@malc.org[juresti@malc.org]	4/7/2021 14:33	Privileged
Re: 2020 redistricting.msg	Lorraine Garcia[lgarcia@malc.org]	Jose[garzpalm@aol.com]	ireyes@malc.org[ireyes@malc.org]; juresti@malc.org[juresti@malc.org]	4/7/2021 14:10	Privileged
Re: 2020 redistricting.msg	Jose[garzpalm@aol.com]	ireyes@malc.org[ireyes@malc.org]; juresti@malc.org[juresti@malc.org]; lgarcia@malc.org[lgarcia@malc.org]		4/6/2021 10:41	Privileged
Re: Hunter move to push election date legislation.msg	Jose[garzpalm@aol.com]	ireyes@malc.org[ireyes@malc.org]; juresti@malc.org[juresti@malc.org]; rafael.anchia@civitascapital.com[rafael.anchia@civitascapital.com]		5/19/2021 14:29	Privileged
Re: Possible HB 3013 amendment.msg	Tannya Oliva[toliva@malc.org]	Joaquin Gonzalez[joaquin@texascivilrightsproject.org]	Jaclyn Uresti[juresti@malc.org]; Irma Reyes[ireyes@malc.org]	5/13/2021 13:48	Privileged

MALC PRIVILEGE LOG

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Tomorrow's Presentation.msg	Jose[garzpalm@aol.com]	ireyes@malc.org[ireyes@malc.org]	juresti@malc.org[juresti@malc.org]	5/28/2021 12:24	Privileged
MALC Pre Redistricting Presentation.pptx				5/28/2021 12:24	Privileged
2020 redistricting invoice.msg	Jose[garzpalm@aol.com]	juresti@malc.org[juresti@malc.org]; ireyes@malc.org[ireyes@malc.org]		5/4/2021 16:04	Privileged
April 30, 2021 invoice.docx				5/4/2021 16:04	Privileged
Re: 2020 redistricting invoice.msg	Irma Reyes[ireyes@malc.org]	Jose[garzpalm@aol.com]		5/18/2021 12:50	Privileged
Re: 2020 redistricting invoice.msg	Jose[garzpalm@aol.com]	ireyes@malc.org[ireyes@malc.org]		5/18/2021 12:46	Privileged
IPM.Note.msg	Jose[garzpalm@aol.com]	toliva@malc.org[toliva@malc.org]	ireyes@malc.org[ireyes@malc.org]	6/30/2021 9:30	Privileged
Copy of planh414_red116_acs_special_tabulation_2015-2019.xls				6/30/2021 9:30	Privileged
House_21R0001a_1519_state_36x36.pdf				6/30/2021 9:30	Privileged
5PM Meeting with Hilliard, Martinez, Gonzales LLP.msg	Irma Reyes[ireyes@malc.org]	Ana Hernandez[jana15@msn.com]	Paige Bufkin[Paige.Bufkin@house.texas.gov]; Jaclyn Uresti[juresti@malc.org]	3/31/2021 14:46	Privileged
5pm Zoom with Hilliard.msg	Irma Reyes[ireyes@malc.org]	Jose[garzpalm@aol.com]		3/30/2021 14:12	Privileged
Agenda & Bills.msg	Irma Reyes[ireyes@malc.org]	Jose[garzpalm@aol.com]	Jaclyn Uresti[juresti@malc.org]	3/18/2021 12:53	Privileged
HB6.pdf				3/18/2021 12:53	Privileged
SB7.pdf				3/18/2021 12:53	Privileged
Feb. 28, 2021 invoice.docx				3/8/2021 11:01	Privileged
Fwd: Fw: Population Report with Estimates.msg	Irma Reyes[ireyes@malc.org]	Jose[garzpalm@aol.com]	Tannya Oliva[toliva@malc.org]	6/30/2021 17:30	Privileged
PlanH414_RED115_2010Census_ACS2015-2019.pdf				6/30/2021 17:30	Privileged
2021-06-25 TX veto petition w Appx - FINAL.pdf				6/25/2021 13:34	Privileged
Proposed Agenda and Background for 5pm Meeting.msg	Irma Reyes[ireyes@malc.org]	Jose[garzpalm@aol.com]	Jaclyn Uresti[juresti@malc.org]	3/31/2021 14:51	Privileged
Re: 2020 redistricting.msg	Irma Reyes[ireyes@malc.org]	Jose[garzpalm@aol.com]	juresti@malc.org[juresti@malc.org]; Lorraine Garcia[lgarcia@malc.org]	4/6/2021 10:30	Privileged
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Re: redistricting.msg	Irma Reyes[ireyes@malc.org]	Jose[garzpalm@aol.com]	juresti@malc.org[juresti@malc.org]	4/26/2021 18:09	Privileged
Re: redistricting.msg	Irma Reyes[ireyes@malc.org]	Jose[garzpalm@aol.com]	juresti@malc.org[juresti@malc.org]	3/5/2021 14:39	Privileged
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Re: redistricting.msg	Irma Reyes[ireyes@malc.org]	Jose[garzpalm@aol.com]	juresti@malc.org[juresti@malc.org]	3/5/2021 13:18	Privileged
Re: redistricting.msg	Irma Reyes[ireyes@malc.org]	Jose[garzpalm@aol.com]	juresti@malc.org[juresti@malc.org]	3/5/2021 13:00	Privileged
Re: Special Sessions.msg	Irma Reyes[ireyes@malc.org]	Jose[garzpalm@aol.com]	juresti@malc.org[juresti@malc.org]; lgarcia@malc.org[lgarcia@malc.org]	3/15/2021 15:42	Privileged
Fwd: List of Possible Litigation Attorneys.msg	Irma Reyes[ireyes@malc.org]	Jose[garzpalm@aol.com]		2/9/2021 12:10	Privileged
List of Possible Litigation Attorneys.msg	Irma Reyes[ireyes@malc.org]	Jose[garzpalm@aol.com]	Jaclyn Uresti[juresti@malc.org]	2/5/2021 15:42	Privileged
2020 redistricting invoice.msg	Jose[garzpalm@aol.com]	juresti@malc.org[juresti@malc.org]; ireyes@malc.org[ireyes@malc.org]		1/4/2021 15:05	Privileged
Dec. 31, 2020 invoice.docx				1/4/2021 15:05	Privileged
CONFIDENTIAL MEMORANDUM.docx				12/18/2020 11:31	Privileged
Bexar polling place letter.msg	Joaquin Gonzalez[joaquin@texascivilrightsproject.org]	Irma Reyes[ireyes@malc.org]; Tannya Oliva[toliva@malc.org]; Jaclyn Uresti[juresti@malc.org]		10/2/2020 16:37	Privileged
Fwd: Art. III , Sec. 28.msg	Irma Reyes[ireyes@malc.org]	Rafael Anchia[rafael.anchia@civitascapital.com]; Jaclyn Uresti[juresti@malc.org]		12/28/2020 12:30	Privileged
CONFIDENTIAL MEMORANDUM.docx				12/28/2020 12:30	Privileged
Jan. 31, 2021 invoice.docx				2/1/2021 10:33	Privileged
potential voting issue flagged by MALDEF.msg	Jose[garzpalm@aol.com]	juresti@malc.org[juresti@malc.org]; ireyes@malc.org[ireyes@malc.org]	martin.golando@gmail.com[martin.golando@gmail.com]	1/25/2021 11:20	Privileged
TLRfoundation_IAC_WebVersion.pdf				1/25/2021 11:20	Privileged
Re: 2020 redistricting invoice.msg	JOSE GARZA[garzpalm@aol.com]	Irma Reyes[ireyes@malc.org]		1/4/2021 20:31	Privileged
Re: 2020 redistricting rules.msg	Jaclyn Uresti[juresti@malc.org]	Jose[garzpalm@aol.com]	ireyes@malc.org[ireyes@malc.org]	12/11/2020 16:36	Privileged
Re: Bexar County Polling Place Closures.msg	Christian Vieira[cvieira@malc.org]	Irma Reyes[ireyes@malc.org]		9/28/2020 17:12	Privileged
Re: Bexar polling place letter.msg	Tannya Oliva[toliva@malc.org]	Joaquin Gonzalez[joaquin@texascivilrightsproject.org]	Irma Reyes[ireyes@malc.org]; Jaclyn Uresti[juresti@malc.org]	10/5/2020 17:26	Privileged

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Re: Bexar polling place letter.msg	Jaclyn Uresti[juresti@malc.org]	Joaquin Gonzalez[joaquin@texascivilrightsproject.org]	Tannya Oliva[toliva@malc.org]; Irma Reyes[ireyes@malc.org]	10/6/2020 9:22	Privileged
Re: Bexar polling place letter.msg	Joaquin Gonzalez[joaquin@texascivilrightsproject.org]	Tannya Oliva[toliva@malc.org]	Irma Reyes[ireyes@malc.org]; Jaclyn Uresti[juresti@malc.org]	10/6/2020 8:17	Privileged
Re: Bexar polling place letter.msg	Tannya Oliva[toliva@malc.org]	Joaquin Gonzalez[joaquin@texascivilrightsproject.org]	Irma Reyes[ireyes@malc.org]; Jaclyn Uresti[juresti@malc.org]	10/2/2020 16:46	Privileged
Re: caucus meeting.msg	Jose[garzpalm@aol.com]	juresti@malc.org[juresti@malc.org]	ireyes@malc.org[ireyes@malc.org]	1/11/2021 11:05	Privileged
Re: caucus meeting.msg	Jaclyn Uresti[juresti@malc.org]	Jose[garzpalm@aol.com]	ireyes@malc.org[ireyes@malc.org]	1/11/2021 10:51	Privileged
Re: Next MALC Town Hall.msg	Joaquin Gonzalez[joaquin@texascivilrightsproject.org]	Irma Reyes[ireyes@malc.org]	Christian Vieira[cvieira@malc.org]; Miguel Rivera[miguel@texascivilrightsproject.org]	9/30/2020 11:31	Privileged
Re: Next MALC Town Hall.msg	Joaquin Gonzalez[joaquin@texascivilrightsproject.org]	Irma Reyes[ireyes@malc.org]	Christian Vieira[cvieira@malc.org]	9/30/2020 11:28	Privileged
Re: Next MALC Town Hall.msg	Christian Vieira[cvieira@malc.org]	Irma Reyes[ireyes@malc.org]		9/30/2020 10:08	Privileged
Re: Next MALC Town Hall.msg	Joaquin Gonzalez[joaquin@texascivilrightsproject.org]	Irma Reyes[ireyes@malc.org]	Christian Vieira[cvieira@malc.org]	9/30/2020 9:20	Privileged
Re: Senate redistricting resolution.msg	Joaquin Gonzalez[joaquin@texascivilrightsproject.org]	Jaclyn Uresti[juresti@malc.org]	Ali Lozano[ali@texascivilrightsproject.org]; Irma Reyes[ireyes@malc.org]; Jerry Philips[jerry@philipsmeachum.com]; Kurt Meachum[kurt@philipsmeachum.com]; Lorraine Garcia[lgarcia@malc.org]; Miguel Rivera[miguel@texascivilrightsproject.org]; Tannya Oliva[toliva@malc.org]	1/13/2021 15:30	Privileged
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Re: Senate redistricting resolution.msg	Joaquin Gonzalez[joaquin@texascivilrightsproject.org]	Jaclyn Uresti[juresti@malc.org]	Ali Lozano[ali@texascivilrightsproject.org]; Lorraine Garcia[lgarcia@malc.org]; Tannya Oliva[toliva@malc.org]; Irma Reyes[ireyes@malc.org]; Jerry Philips[jerry@philipsmeachum.com]; Kurt Meachum[kurt@philipsmeachum.com]; Miguel Rivera[miguel@texascivilrightsproject.org]	1/13/2021 8:19	Privileged
Re: Senate redistricting resolution.msg	Joaquin Gonzalez[joaquin@texascivilrightsproject.org]	Lorraine Garcia[lgarcia@malc.org]	Tannya Oliva[toliva@malc.org]; Ali Lozano[ali@texascivilrightsproject.org]; Irma Reyes[ireyes@malc.org]; Jaclyn Uresti[juresti@malc.org]; Jerry Philips[jerry@philipsmeachum.com]; Kurt Meachum[kurt@philipsmeachum.com]; Miguel Rivera[miguel@texascivilrightsproject.org]	1/12/2021 10:57	Privileged
Resolution_DRAFT.pdf				1/12/2021 10:57	Privileged
Attached: Materials for Board Meeting.msg	Irma Reyes[ireyes@malc.org]	Jaclyn Uresti[juresti@malc.org]; Tannya Oliva[toliva@malc.org]		2/9/2021 16:56	Privileged
Caucus - engagement letter draft, 2020 redistricting, 1.doc				2/9/2021 16:56	Privileged
Fair Maps Texas House Rules Proposals.docx				10/27/2020 11:41	Privileged
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Caucus - engagement letter draft, 2020 redistricting, 1.doc				2/1/2021 17:28	Privileged
Jan. 31, 2021 invoice.docx				2/1/2021 17:28	Privileged
Re: 2020 redistricting invoice.msg	Irma Reyes[ireyes@malc.org]	Jose[garzpalm@aol.com]	juresti@malc.org[juresti@malc.org]	1/4/2021 19:29	Privileged
Re: Bexar County Polling Place Closures.msg	Irma Reyes[ireyes@malc.org]	Joaquin Gonzalez[joaquin@texascivilrightsproject.org]	Jaclyn Uresti[juresti@malc.org]	9/28/2020 11:09	Privileged
Re: PR: REP. ANCHIA & SEN. MENÉNDEZ FILE BILLS TO REPEAL ANTI-IMMIGRANT LAW.msg	Irma Reyes[ireyes@malc.org]	Jose[garzpalm@aol.com]	juresti@malc.org[juresti@malc.org]	1/25/2021 12:53	Privileged

MALC PRIVILEGE LOG

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MALC Redistricting Town Hall - Agenda.msg	Tannya Oliva[toliva@malc.org]	garzpalm@aol.com[garzpalm@aol.com]	Irma Reyes[ireyes@malc.org]	9/18/2020 16:40	Privileged
Re: HDC Panel Next Wed. 8/26 10am-11:30am.msg	Jose[garzpalm@aol.com]	philliptxhdc@gmail.com[philliptxhdc@gmail.com]; ireyes@malc.org[ireyes@malc.org]	caratxhdc@gmail.com[caratxhdc@gmail.com]	8/24/2020 11:09	Privileged
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Re: Meeting Request from Representative Gervin-Hawkins.msg	Jose[garzpalm@aol.com]	Cayethania.Castillo@house.texas.gov[Cayethania.Castillo@house.texas.gov]	JD.Pedraza@house.texas.gov[JD.Pedraza@house.texas.gov]	9/2/2020 11:02	Privileged
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follow up on HB 4181.msg	Jaclyn Uresti[juresti@malc.org]	Joaquin Gonzalez[joaquin@texascivilrightsproject.org]; Irma Reyes[ireyes@malc.org]		10/29/2019 18:00	Privileged
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Nueces County redistricting hearing.msg	Jose[garzpalm@aol.com]	ireyes@malc.org[ireyes@malc.org]; juresti@malc.org[juresti@malc.org]	martin.golando@gmail.com[martin.golando@gmail.com]	11/1/2019 11:03	Privileged
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Re: follow up on HB 4181.msg	Joaquin Gonzalez[joaquin@texascivilrightsproject.org]	Jaclyn Uresti[juresti@malc.org]	Irma Reyes[ireyes@malc.org]	10/29/2019 19:04	Privileged
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redistricting fees.msg	Jose[garzpalm@aol.com]	juresti@malc.org[juresti@malc.org]; ireyes@malc.org[ireyes@malc.org]	rafael.anchia@civitascapital.com[rafael.anchia@civitascapital.c om]	8/21/2019 14:47	Privileged
draft Letter to Paxton.final.docx				8/21/2019 14:47	Privileged
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Corpus Redistricting Hearing.msg	Irma Reyes[ireyes@malc.org]	Jose[garzpalm@aol.com]; martin.golando@gmail.com[martin.golando@gmail.com]	Jaclyn Uresti[juresti@malc.org]	10/31/2019 14:20	Privileged
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Re: Nueces County redistricting hearing.msg	Irma Reyes[ireyes@malc.org]	Jose[garzpalm@aol.com]	juresti@malc.org[juresti@malc.org]; martin.golando@gmail.com[martin.golando@gmail.com]	11/1/2019 11:41	Privileged
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Re: Approval Requested: MALC Amici Briefs for VBM Lawsuits.msg	Mary González[mary@maryegonzalez.com]	Eddie Rodriguez[repeddierodriguez@gmail.com]	Irma Reyes[ireyes@malc.org]; Rafael Anchia[rafael.anchia@civitascapital.com]; Ana Hernandez[ana15@msn.com]; Armando Martinez[amtz059@hotmail.com]; Armando Walle[AWalle29@yahoo.com]; Jaclyn Uresti[juresti@malc.org]	5/5/2020 20:51	Privileged
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Re: Draft Email to MALC Members Re: Hold Letters.msg	Christian Vieira[cvieira@malc.org]	Jaclyn Uresti[juresti@malc.org]	Sean McCaffity[SMcCaffity@textrial.com]; Irma Reyes[Irma.Reyes@house.texas.gov]; Joaquin Gonzalez[jgonzalez@malc.org]	1/14/2022 11:18	Privileged
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Changes in the Co... - @jgonzalez@malc.org is this needed to....msg	Joaquin Gonzalez (Google Docs)[comments-noreply@docs.google.com]	juresti@malc.org[juresti@malc.org]		10/18/2021 18:55	Privileged
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Draft Petition -- state court county line rule.msg	Joaquin Gonzalez[jgonzalez@malc.org]	Sean McCaffity[SMcCaffity@textrial.com]; Tex Quesada[Quesada@textrial.com]; Jose[garzpalm@aol.com]; Christian Vieira[cvieira@malc.org]; Jaclyn Uresti[juresti@malc.org]		10/30/2021 15:04	Privileged

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Fwd: LULAC v. Abbott -- DOJ Interview with Rep. Eddie Morales.msg	Joaquin Gonzalez[jgonzalez@malc.org]	Jaclyn Uresti[juresti@malc.org]; Tannya Oliva[toliva@malc.org]; Christian Vieira[cvieira@malc.org]; Sean McCaffity[SMcCaffity@textrial.com]		4/26/2022 10:00	Privileged
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Questions on ccr ... - @jgonzalez@malc.org are you referring....msg	Joaquin Gonzalez (Google Docs)[comments-noreply@docs.google.com]	juresti@malc.org[juresti@malc.org]		10/18/2021 14:54	Privileged
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Re: Draft Petition -- state court county line rule.msg	Joaquin Gonzalez[jgonzalez@malc.org]	Tex Quesada[Quesada@textrial.com]	Christian Vieira[cvieira@malc.org]; Sean McCaffity[SMcCaffity@textrial.com]; Jose[garzpalm@aol.com]; Jaclyn Uresti[juresti@malc.org]	11/2/2021 12:07	Privileged
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2021.10.18 202 Petition.pdf				10/18/2021 17:09	Privileged
Fwd: Bernal Amendment (Plan H2230).msg	Jaclyn Uresti[juresti@malc.org]	Joaquin Gonzalez[jgonzalez@malc.org]		10/10/2021 15:26	Privileged
Fwd: Call.msg	Jaclyn Uresti[juresti@malc.org]	Christian Vieira[cvieira@malc.org]		10/12/2021 20:46	Privileged
Fwd: Call.msg	Jaclyn Uresti[juresti@malc.org]	Jose Garza[garz palm@aol.com]		10/12/2021 17:31	Privileged
Fwd: Document2.msg	Jaclyn Uresti[juresti@malc.org]	Tannya Oliva[toliva@malc.org]; Christian Vieira[cvieira@malc.org]		10/12/2021 8:20	Privileged
Document2.docx				10/12/2021 8:20	Privileged
Fwd: Email from Dr. Potter.msg	Jaclyn Uresti[juresti@malc.org]	joaquinrobertgonzalez@gmail.com[joaquinrobertgonzalez@gmail.com]		9/1/2021 13:25	Privileged
Response to Representative Anchia's question (1).pdf				9/1/2021 13:25	Privileged
Fwd: FW: HB 6, Elections Committee – MALC & TXLBC Request for Member Participation, Virtual Testimony, and Expert Witnesses.msg	Jaclyn Uresti[juresti@malc.org]	Joaquin Gonzalez[jgonzalez@malc.org]		4/13/2022 10:48	Privileged
Fwd: FW: Modus Sommerman McCaffity - Mexican American Legislative Council Collection Recap and To Do List (Next Steps).msg	Jaclyn Uresti[juresti@malc.org]	Joaquin Gonzalez[jgonzalez@malc.org]; Sean McCaffity[SMcCaffity@textrial.com]; Christian Vieira[cvieira@malc.org]		4/25/2022 14:14	Privileged
Fwd: MALC v. Abbott Scheduling Issues ASAP.msg	Jaclyn Uresti[juresti@malc.org]	Ana Reyes[ana.reyes@house.texas.gov]		12/21/2021 15:13	Privileged
Fwd: SB 4 and SB 7 materials.msg	Jaclyn Uresti[juresti@malc.org]	Joaquin Gonzalez[jgonzalez@malc.org]; Christian Vieira[cvieira@malc.org]		10/10/2021 20:17	Privileged
Re: LULAC v. Abbott -- DOJ Interview with Rep. Eddie Morales.msg	Jaclyn Uresti[juresti@malc.org]	Joaquin Gonzalez[jgonzalez@malc.org]	Tannya Oliva[toliva@malc.org]; Christian Vieira[cvieira@malc.org]; Sean McCaffity[SMcCaffity@textrial.com]	4/26/2022 10:04	Privileged
Re: malc bylaws or operating agreement.msg	Jaclyn Uresti[juresti@malc.org]	Sean McCaffity[SMcCaffity@textrial.com]		12/10/2021 19:06	Privileged
Re: MALC Discovery Requests.msg	Jaclyn Uresti[juresti@malc.org]	Joaquin Gonzalez[jgonzalez@malc.org]	Christian Vieira[cvieira@malc.org]; Sean McCaffity[SMcCaffity@textrial.com]; Tannya Oliva[toliva@malc.org]	5/4/2022 17:03	Privileged
Re: MALC docs we need.msg	Jaclyn Uresti[juresti@malc.org]	Joaquin Gonzalez[jgonzalez@malc.org]		12/10/2021 17:24	Privileged
Re: MALC Redistricting Attorneys.msg	Jaclyn Uresti[juresti@malc.org]	JJ Garza[JJ.Garza@house.texas.gov]; Joaquin Gonzalez[jgonzalez@malc.org]		9/14/2021 8:10	Privileged
Re: MALC Redistricting Attorneys.msg	Jaclyn Uresti[juresti@malc.org]	Joaquin Gonzalez[jgonzalez@malc.org]	JJ Garza[JJ.Garza@house.texas.gov]	9/14/2021 11:30	Privileged
Re: preservation letters.msg	Jaclyn Uresti[juresti@malc.org]	Sean McCaffity[SMcCaffity@textrial.com]	Joaquin Gonzalez[jgonzalez@malc.org]	10/20/2021 0:39	Privileged
Re: Redistricting correspondence.msg	Jaclyn Uresti[juresti@malc.org]	Sean McCaffity[SMcCaffity@textrial.com]		12/6/2021 16:59	Privileged
Re: Redistricting correspondence.msg	Jaclyn Uresti[juresti@malc.org]	Sean McCaffity[SMcCaffity@textrial.com]		12/6/2021 13:34	Privileged
Re: Rule 202 hearing.msg	Jaclyn Uresti[juresti@malc.org]	Sean McCaffity[SMcCaffity@textrial.com]		12/3/2021 12:35	Privileged
Re: time for a quick call.msg	Jaclyn Uresti[juresti@malc.org]	Joaquin Gonzalez[jgonzalez@malc.org]	Nina Perales[nperales@maldef.org]; Fatima Menendez[fmenendez@maldef.org]; Sean McCaffity[SMcCaffity@textrial.com]; Tex Quesada[Quesada@textrial.com]; Samantha Serna[sserna@maldef.org]	10/13/2021 22:43	Privileged
Re: Help with mysterious question.msg	Joaquin Gonzalez[joaquin@texascivilrightsproject.org]	Jaclyn Uresti[juresti@malc.org]	Tannya Oliva[toliva@malc.org]; Lorraine Garcia[lgarcia@malc.org]	2/3/2021 0:11	Privileged
Fwd: Art. III , Sec. 28.msg	Jaclyn Uresti[juresti@malc.org]	Lorraine Garcia[lgarcia@malc.org]		2/5/2021 13:57	Privileged
CONFIDENTIAL MEMORANDUM.docx				2/5/2021 13:57	Privileged
Fwd: Possible redistricting interim charges.msg	Jaclyn Uresti[juresti@malc.org]	Darcy Caballero[dcaballero@malc.org]		7/17/2019 15:55	Privileged
Fwd: Possible redistricting interim charges.msg	Jaclyn Uresti[juresti@malc.org]	Emily Amps[Emily.Amps@house.texas.gov]		7/17/2019 15:53	Privileged
Possible redistricting interim charges.msg	Joaquin Gonzalez[joaquin@texascivilrightsproject.org]	Jaclyn Uresti[juresti@malc.org]		7/17/2019 15:19	Privileged
Re: Possible redistricting interim charges.msg	Joaquin Gonzalez[joaquin@texascivilrightsproject.org]	Jaclyn Uresti[juresti@malc.org]		7/17/2019 16:01	Privileged
Re: Possible redistricting interim charges.msg	Jaclyn Uresti[juresti@malc.org]	Joaquin Gonzalez[joaquin@texascivilrightsproject.org]		7/17/2019 15:55	Privileged

File_Name	Email_From	row	Email_CC	DateFamily	.Privileged
memorandum on process, 9-10-19.docx				9/10/2019 11:06	Privileged
Fwd: Art. III , Sec. 28.msg	Irma Reyes[ireyes@malc.org]	Rafael Anchia[rafael.anchia@civitascapital.com]; Jaclyn Uresti[juresti@malc.org]		12/28/2020 12:30	Privileged
CONFIDENTIAL MEMORANDUM.docx				12/28/2020 12:30	Privileged
Fwd: [Sign-on Requested] Renewed request for more interim redistricting field hearings/greater accessibility.msg	Joaquin Gonzalez[joaquin@texascivilrightsproject.org]	Jaclyn Uresti[juresti@malc.org]		6/3/2019 8:27	Privileged
Final Signed Letter to Texas Civil Rights Project regarding Interim Hearings (1).pdf				6/3/2019 8:27	Privileged
Request for Additional Redistricting Committee Hearing and Additional Field Hearing Locations.pdf				6/3/2019 8:27	Privileged
subcommittee report.PDF				6/3/2019 8:27	Privileged
HB 1888 materials.msg	Joaquin Gonzalez[joaquin@texascivilrightsproject.org]	Jaclyn Uresti[juresti@malc.org]		5/6/2019 0:26	Privileged
Hb 1888.msg	Joaquin Gonzalez[joaquin@texascivilrightsproject.org]	Jaclyn Uresti[juresti@malc.org]		3/9/2019 15:34	Privileged
redistricting field hearing letter.msg	Joaquin Gonzalez[joaquin@texascivilrightsproject.org]	Jaclyn Uresti[juresti@malc.org]		4/9/2019 22:06	Privileged
THDCOS by Member Distribution List 86th stj 03-04-2019F.xlsx				3/4/2019 11:41	Privileged
Re: redistricting field hearing letter.msg	Jaclyn Uresti[juresti@malc.org]	Joaquin Gonzalez[joaquin@texascivilrightsproject.org]		4/9/2019 22:09	Privileged
Re: Thank you dinner?.msg	Jaclyn Uresti[juresti@malc.org]	Joaquin Gonzalez[joaquin@texascivilrightsproject.org]	Ana Ramon[anaramon@txsdc.org]; James Slattery[james@texascivilrightsproject.org]; Beth Stevens[beth@texascivilrightsproject.org]	6/6/2019 13:56	Privileged
Re: Thank you dinner?.msg	Jaclyn Uresti[juresti@malc.org]	Justin Perez[justinwperez@gmail.com]	Ana Ramon[anaramon@txsdc.org]; Joaquin Gonzalez[joaquin@texascivilrightsproject.org]; James Slattery[james@texascivilrightsproject.org]; Beth Stevens[beth@texascivilrightsproject.org]	6/4/2019 12:41	Privileged

<u>Item Description</u>	<u>Date</u>	<u>From</u>	<u>To</u>	<u>Privilege Description</u>
Text Message between TMF & Martin Golando discussing CD 35	10/20/2021	Trey Martinez Fischer	Martin Golando	Attorney Client Privilege

LULAC V. ABBOTT, 3:21-cv-00259-DCG-JES-JVB

LULAC PLAINTIFFS' AMENDED LOG OF PRIVILEGED MATERIALS

Bates Number	Custodian	Date Document Prepared or Created	Document Type	Author or Sender	Recipients	Privilege or Protection Asserted	Description
LULAC0051	MABA-TX	1/4/2022	PDF	Russell Ramirez		Work Product Doctrine	Confidential email to internal MABA-TX team regarding developments in redistricting lawsuit.
LULAC0052	MABA-TX	5/7/2021	PDF	Nina Perales (Attorney)	Texas Latino Redistricting Task Force*	Attorney-Client Privilege	Confidential email to Texas Latino Redistricting Task Force regarding legislative developments and upcoming redistricting communications, including attorney analysis, mental impressions, strategy and/or legal advice
LULAC0053 - LULAC0054	MABA-TX	4/16/2021	PDF	Russell Ramirez		Work Product Doctrine	Notes from local MABA-Texas chapter meeting including litigation developments and strategy.
LULAC0055	MABA-TX	5/11/2021	PDF	Nina Perales (Attorney)	Texas Latino Redistricting Task Force	Attorney-Client Privilege	Confidential email to Texas Latino Redistricting Task Force regarding redistricting guide and forthcoming meeting, including attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0056 - LULAC0059	MABA-TX	7/15/2021	PDF	Nina Perales (Attorney)	Texas Latino Redistricting Task Force	Attorney-Client Privilege	Confidential email to Texas Latino Redistricting Task Force regarding legislative developments and upcoming redistricting special session, including attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0060 - LULAC0061	MABA-TX	7/7/2021	PDF	Lulu Flores	Russell Ramirez	Work Product Doctrine; Attorney-Client Privilege	Confidential email to MABA-TX leadership regarding notes from redistricting meeting, including attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0062 - LULAC0063	MABA-TX	7/1/2021	PDF	Fátima Menendez (Attorney)	Texas Latino Redistricting Task Force, Nina Perales (Attorney), Michael Mireles	Attorney-Client Privilege	Confidential email to Texas Latino Redistricting Task Force regarding House Redistricting Committee hearing, including attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0064 - LULAC0065	MABA-TX	8/12/2021	PDF	Nina Perales (Attorney)	Texas Latino Redistricting Task Force, Fátima Menendez (Attorney), Michael Mireles	Attorney-Client Privilege	Confidential email to Texas Latino Redistricting Task Force regarding Census developments, including attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0066 - LULAC0070	MABA-TX	8/27/2021	PDF	Russell Ramirez		Attorney-Client Privilege; Work Product Doctrine	Notes from Texas Latino Redistricting Task Force meeting regarding Census data release and anticipated litigation, which included attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0071	MABA-TX	8/25/2021	PDF	Nina Perales (Attorney)	Texas Latino Redistricting Task Force, Fátima Menendez (Attorney), Michael Mireles	Attorney-Client Privilege	Confidential email to Texas Latino Redistricting Task Force regarding redistricting hearings, including attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0072	MABA-TX	8/28/2021	PDF	Russell Ramirez	Nina Perales (Attorney)	Attorney-Client Privilege	Confidential email to counsel regarding redistricting lawsuit.
LULAC0073	MABA-TX	9/6/2021	PDF	Benny Agosto	Russell Ramirez	Work Product Doctrine; Attorney-Client Privilege	Confidential email to MABA-TX leadership regarding notes from redistricting meeting. Includes attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0074	MABA-TX	9/7/2021	PDF	Belinda Arambula	Russell Ramirez	Work Product Doctrine; Attorney-Client Privilege	Confidential email to MABA-TX leadership regarding notes from redistricting meeting. Includes attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0075 - LULAC0076	MABA-TX	9/6/2021	PDF	Russell Ramirez	Belinda Arambula	Work Product Doctrine; Attorney-Client Privilege	Confidential email regarding notes from redistricting meeting.
LULAC0077 - LULAC0078	MABA-TX	8/25/2021	PDF	Nina Perales (Attorney)	Texas Latino Redistricting Task Force, Fátima Menendez (Attorney), Michael Mireles	Attorney-Client Privilege	Confidential email to Texas Latino Redistricting Task Force regarding upcoming Texas Latino Redistricting Task Force meeting and Census developments, including attorney analysis, mental impressions, strategy and/or legal advice.

LULAC0079	MABA-TX	9/17/2021	PDF	Nina Perales (Attorney)	Texas Latino Redistricting Task Force, Lydia Camarillo	Attorney-Client Privilege	Confidential email to Texas Latino Redistricting Task Force regarding upcoming Texas Latino Redistricting Task Force meeting, legislative redistricting special session, and anticipated litigation, including attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0080	MABA-TX	9/29/2021	PDF	Nina Perales (Attorney)	Texas Latino Redistricting Task Force, Lydia Camarillo, Smantha Serna, Fátima Menendez (Attorney), Michael Mireles	Attorney-Client Privilege	Confidential email to Texas Latino Redistricting Task Force regarding upcoming Texas Latino Redistricting Task Force meeting, legislative redistricting special session, and anticipated litigation, including attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0081 - LULAC0085	MABA-TX	9/20/21	PDF	Russell Ramirez		Work Product Doctrine; Attorney-Client Privilege	Notes from Texas Latino Redistricting Task Force meeting regarding legislative redistricting special session and anticipated litigation, which included attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0086 - LULAC0087	MABA-TX	8/28/2021	PDF	Nina Perales (Attorney)	Texas Latino Redistricting Task Force, Fátima Menendez (Attorney), Michael Mireles	Attorney-Client Privilege	Confidential email regarding Texas Latino Redistricting Task Force's proposed redistricting plans, including attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0088	MABA-TX	8/28/2021	PDF	Nina Perales (Attorney)	Texas Latino Redistricting Task Force, Fátima Menendez (Attorney), Michael Mireles	Attorney-Client Privilege	Confidential email regarding Census data, including attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0089	MABA-TX	4/5/2021	PDF	Nina Perales (Attorney)	Texas Latino Redistricting Task Force; Lydia Camarillo	Attorney-Client Privilege	Confidential email to Texas Latino Redistricting Task Force regarding upcoming Texas Latino Redistricting Task Force meeting and potential litigation, including attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0090	MABA-TX	3/30/2021	PDF	Fátima Menendez (Attorney)	Russell Ramirez; Lydia Camarillo; Jana Ortega; Gloria Leal; Lulu Flores; Fátima Menendez (Attorney)	Work Product Doctrine; Attorney-Client Privilege	Confidential email to MABA-TX leadership regarding redistricting proposed plan, including attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0091	MABA-TX	3/12/2021	PDF	Russell Ramirez		Work Product Doctrine	Internal notes regarding redistricting plan.
LULAC0092	MABA-TX	3/11/2021	PDF	Lydia Camarillo	Russell Ramirez; Steven Aleman; Renee De La Cruz; M. Escobar Angelica Hernandez; Gloria Leal; R. Mejia; Jana Ortega; Danny Razo; Gavin Villareal; Belinda Arambula	Work Product Doctrine	Email regarding redistricting legislative hearings.
LULAC0093	MABA-TX		PDF	Russell Ramirez		Work Product Doctrine; Attorney-Client Privilege	Notes regarding Texas Latino Redistricting Task Force meeting.
LULAC0094 - LULAC0096	MABA-TX		PDF	Russell Ramirez		Work Product Doctrine; Attorney-Client Privilege	Notes regarding Texas Latino Redistricting Task Force meeting.
LULAC0097	MABA-TX	2/15/2021	PDF	Russell Ramirez	Belinda Arambula; Jana Ortega; Lulu Flores; Gloria Leal	Work Product Doctrine	Notes regarding Texas Latino Redistricting Task Force meeting, which included attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0098	MABA-TX	2/15/2021	PDF	Russell Ramirez	Belinda Arambula; Jana Ortega; Lulu Flores; Gloria Leal	Work Product Doctrine	Notes regarding Texas Latino Redistricting Task Force meeting, which included attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0099	MABA-TX	1/28/2021	PDF	Lydia Camarillo	Texas Latino Redistricting Task Force; Patricia Gonaes; Fátima Menendez (Attorney); Valerie Morales; Russell Ramirez	Attorney-Client Privilege	Confidential email to Texas Latino Redistricting Task Force regarding upcoming Texas Latino Redistricting Task Force meeting and participating in redistricting process, including attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0100 - LULAC0101	MABA-TX	2/5/2021	PDF	Fátima Menendez (Attorney)	Texas Latino Redistricting Task Force; Nina Perales (Attorney); Patricia Gonzales	Attorney-Client Privilege	Email to Texas Latino Redistricting Task Force regarding legislative committee assignments, including attorney analysis, mental impressions, strategy and/or legal advice.

LULAC0102 - LULAC0104	MABA-TX	1/29/2021	PDF	Russell Ramirez		Work Product Doctrine; Attorney-Client Privilege	Notes regarding Texas Latino Redistricting Task Force meeting, including attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0105 - LULAC0107	MABA-TX	1/24/2021	PDF	Russell Ramirez	Lulu Flores; Martin Garza;	Work Product Doctrine; Attorney-Client Privilege	Email to MABA-TX leadership regarding MABA-TX participation in Texas Latino Redistricting Task Force, upcoming Texas Latino Redistricting Task Force meeting, and redistricting regional hearings, including attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0108 - LULAC0109	MABA-TX	1/23/2021	PDF	Florinda Chavez	Texas Latino Redistricting Task Force; Fátima Menendez (Attorney); Nina Perales (Attorney)	Attorney-Client Privilege	Email to Texas Latino Redistricting Task Force regarding Texas HOPE membership in Task Force. Includes attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0110 - LULAC0111	MABA-TX	1/19/2021	PDF	Russell Ramirez	Lulu Flores	Work Product Doctrine; Attorney-Client Privilege	Email to MABA-TX leadership regarding Texas Latino Redistricting Task Force information on redistricting regional hearings. Includes attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0112 - LULAC0113	MABA-TX	1/15/2021	PDF	Amanda Moore	Russell Ramirez	Attorney-Client Privilege	Email regarding upcoming Texas Latino Redistricting Task Force meeting. Includes attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0114	MABA-TX	4/8/2021	PDF	Nina Perales (Attorney)	Texas Latino Redistricting Task Force	Attorney-Client Privilege	Email to Texas Latino Redistricting Task Force regarding legislative developments and upcoming meeting agenda, including attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0115	MABA-TX	4/10/2021	PDF	Russell Ramirez	Steven Aleman; Renee De La Cruz; Belinda Arambula;	Work Product Doctrine; Attorney-Client Privilege	Email regarding developments from Texas Latino Redistricting Task Force meeting. Includes attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0116 - LULAC0118	MABA-TX	4/9/2021	PDF	Russell Ramirez		Work Product Doctrine; Attorney-Client Privilege	Notes from Texas Latino Redistricting Task Force meeting. Includes attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0119	MABA-TX	7/8/2021	PDF	Russell Ramirez		Work Product Doctrine; Attorney-Client Privilege	Notes regarding legislation and redistricting litigation.
LULAC0120	MABA-TX	7/8/2021	PDF	Russell Ramirez		Work Product Doctrine; Attorney-Client Privilege	Notes regarding legislation and redistricting litigation.
LULAC0121	Proyecto Azteca	1/12/2021	PDF	Nina Perales (Attorney)	Texas Latino Redistricting Task Force, Fátima Menendez (Attorney)	Attorney-Client Privilege	Confidential email to Texas Latino Redistricting Task Force regarding new proposed rules in Texas Senate regarding redistricting. Includes attorney analysis, mental impressions, strategy and/or legal advice..
LULAC0122	Proyecto Azteca	1/19/2021	PDF	Fátima Menendez (Attorney)	Texas Latino Redistricting Task Force, Nina Perales (Attorney)	Attorney-Client Privilege	Confidential email to Texas Latino Redistricting Task Force regarding Texas Senate regional hearings on redistricting. Includes attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0123 - LULAC0127	Proyecto Azteca	1/23/2021	PDF	Fátima Menendez (Attorney)	Texas Latino Redistricting Task Force, Nina Perales (Attorney)	Attorney-Client Privilege	Confidential email to Texas Latino Redistricting Task Force regarding regional redistricting hearings, including attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0128	Proyecto Azteca	1/29/2021	PDF	Lydia Camarillo	Texas Latino Redistricting Task Force, Fátima Menendez (Attorney), Nina Perales (Attorney), Patricia Gonzales	Attorney-Client Privilege	Confidential email to Texas Latino Redistricting Task Force regarding upcoming Texas Latino Redistricting Task Force meeting, including attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0129 - LULAC0130	Proyecto Azteca	2/5/2021	PDF	Fátima Menendez (Attorney)	Texas Latino Redistricting Task Force; Nina Perales (Attorney); Patricia Gonzales	Attorney-Client Privilege	Email to Texas Latino Redistricting Task Force regarding legislative committee assignments, including attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0131	Proyecto Azteca	3/4/2021	PDF	Lydia Camarillo	Texas Latino Redistricting Task Force	Attorney-Client Privilege	Confidential email to Texas Latino Redistricting Task Force regarding dates for redistricting committee testimony, including attorney analysis, mental impressions, strategy and/or legal advice.

LULAC0132	Proyecto Azteca	3/25/2021	PDF	Lydia Camarillo	Texas Latino Redistricting Task Force	Attorney-Client Privilege; Work Product Doctrine	Confidential email to Texas Latino Redistricting Task Force regarding bill-related testimony and analysis of legislation, including attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0133	Proyecto Azteca	3/25/2021	PDF	Lydia Camarillo	Texas Latino Redistricting Task Force	Attorney-Client Privilege; Work Product Doctrine	Confidential email to Texas Latino Redistricting Task Force regarding bill-related testimony and analysis of legislation, including attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0134	Proyecto Azteca	4/5/2021	PDF	Nina Perales (Attorney)	Texas Latino Redistricting Task Force	Attorney-Client Privilege; Work Product Doctrine	Confidential email to Texas Latino Redistricting Task Force regarding upcoming meeting of the group and introduced redistricting legislation. Includes attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0135	Proyecto Azteca	4/6/2021	PDF	Nina Perales (Attorney)	Texas Latino Redistricting Task Force	Attorney-Client Privilege; Work Product Doctrine	Confidential email to Texas Latino Redistricting Task Force regarding upcoming meeting of the group and introduced redistricting legislation. Includes attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0136	Proyecto Azteca	4/8/2021	PDF	Nina Perales (Attorney)	Texas Latino Redistricting Task Force	Attorney-Client Privilege	Confidential email to Texas Latino Redistricting Task Force regarding forthcoming meeting. Includes attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0137 - LULAC0138	Proyecto Azteca	4/26/2021	PDF	Nina Perales (Attorney)	Texas Latino Redistricting Task Force	Attorney-Client Privilege	Confidential email to Texas Latino Redistricting Task Force regarding release of U.S. Census data. Includes attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0139 - LULAC0140	Proyecto Azteca	4/26/2021	PDF	Nina Perales (Attorney)	Texas Latino Redistricting Task Force	Attorney-Client Privilege	Confidential email to Texas Latino Redistricting Task Force regarding release of U.S. Census data. Includes attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0141	Proyecto Azteca	5/7/2021	PDF	Nina Perales (Attorney)	Texas Latino Redistricting Task Force	Attorney-Client Privilege	Confidential email to Texas Latino Redistricting Task Force regarding redistricting and other voting-related legislation. Includes attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0142 - LULAC0143	Proyecto Azteca	5/11/2021	PDF	Nina Perales (Attorney)	Texas Latino Redistricting Task Force	Attorney-Client Privilege	Confidential email to Texas Latino Redistricting Task Force regarding redistricting guide and forthcoming meeting, including attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0144	Proyecto Azteca	6/15/2021	PDF	Lydia Camarillo	Texas Latino Redistricting Task Force	Attorney-Client Privilege; Work Product Doctrine	Confidential email to Texas Latino Redistricting Task Force regarding forthcoming meeting about analysis and impressions of Census data and election analysis. Includes attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0145 - LULAC0146	Proyecto Azteca	7/1/2021	PDF	Fátima Menendez (Attorney)	Texas Latino Redistricting Task Force, Michael Mireles	Attorney-Client Privilege	Confidential email to Texas Latino Redistricting Task Force regarding House Redistricting Committee hearing. Includes attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0147 - LULAC0149	Proyecto Azteca	7/8/2021	PDF	Fátima Menendez (Attorney)	Texas Latino Redistricting Task Force, Nina Perales (Attorney)	Attorney-Client Privilege	Confidential email to Texas Latino Redistricting Task Force regarding House Redistricting Committee hearings. Includes attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0150	Proyecto Azteca	7/13/2021	PDF	Nina Perales (Attorney)	Texas Latino Redistricting Task Force, Michael Mireles, Fátima Menendez (Attorney)	Attorney-Client Privilege	Confidential email to Texas Latino Redistricting Task Force regarding House Redistricting Committee hearings. Includes attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0151	Proyecto Azteca	8/5/2021	PDF	Nina Perales (Attorney)	Texas Latino Redistricting Task Force, Fátima Menendez (Attorney), Michael Mireles	Attorney-Client Privilege	Confidential email to Texas Latino Redistricting Task Force regarding Census, redistricting, and special session. Includes attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0152 - LULAC0153	Proyecto Azteca	8/12/2021	PDF	Nina Perales (Attorney)	Texas Latino Redistricting Task Force, Fátima Menendez (Attorney), Michael Mireles	Attorney-Client Privilege; Work Product Doctrine	Confidential email to Texas Latino Redistricting Task Force regarding Census and redistricting. Includes attorney analysis, mental impressions, strategy and/or legal advice.

LULAC0154	Proyecto Azteca	8/23/2021	PDF	Lydia Camarillo	Texas Latino Redistricting Task Force	Attorney-Client Privilege	Confidential email to Texas Latino Redistricting Task Force regarding forthcoming meeting. Includes attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0155	Proyecto Azteca	8/28/2021	PDF	Nina Perales (Attorney)	Texas Latino Redistricting Task Force	Attorney-Client Privilege	Confidential email to Texas Latino Redistricting Task Force regarding TLC maps and 2020 Census data. Includes attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0156	LULAC	11/18/2021	DOC	Gloria Leal	Rodolfo Rosales and State LULAC Board	Attorney-Client Privilege; Work Product Doctrine	Confidential internal memo regarding redistricting lawsuit, including attorney analysis, mental impressions, strategy and/or legal advice.

* Texas Latino Redistricting Task Force includes the following individuals: Lawrence Romo, Lourdes Flores, Ramona Casas, Tony Villareal, Cesar Espinosa, Gloria Gonzales Dholakia, Jackie Bastard, Patricia, Karina Alvarez, Juan Livas, Juanita Valdez-Cox, Daniel Diaz, Domingo Garcia, Gloria Leal, Jana Ortega, Angelica Razo, Dan Solis, Ann Cass, Amber Arriaga Salinas, Danielle Salgado, Veronica Garza, Paula Barrera, Adriana Cadena, Lydia Camarillo, Patricia Gonzales, Diana Lopez, Stan Paz, Juan Cabrera, Sam Guzman, Pauline Anton, Joey Cardenas, Florinda Chavez, Manuel Grajeda, Roxanne Garza, Juan Manuel Guzman, Camille Martin, Ana Gonzalez, Juan Benitez, Emily Timm, Ana Gonzalez, Brianna Carmen, Pedro Lira, Antonio Arellano, Martha Zapata, Irasema Cavazos, Petra Mata, Virdiana Tule Carrizales, Dayann Pazmino, Jordan Buckley, Jayme Mathias, Vincent Tovar, Hector Sanchez Barba, Elizabeth Bille, Genesis Sanchez, Levar Martin, Angelica Andrade, Norma Herrera, Julio Acosta, Carolina Canizales, Naiyolis Palomo, Lilliana Saldana, Christopher Carmona, Olivia Hernandez, Jesse Romero, Daniel Villanueva, Toni Cordova, Juan Flores, Michelle Tremillo, Jesse Azua, Tiffany Hogue, Adrian Reyna and Vanessa Rodriguez.

Jack DiSorbo

From: Jack DiSorbo
Sent: Friday, June 24, 2022 11:55 AM
To: Kenneth Parreno; Nina Perales
Cc: dfox@elias.law; pchaudhuri@lawyerscommittee.org; Patrick Sweeten; Will Thompson; Courtney Corbello
Subject: RE: LULAC v. Abbott, 3:21-cv-259: Final Meet and Confer Regarding Documents Withheld by Defendant Abbott

Kenneth,

I appreciate your response, though disagree with the sentiments expressed. I think future conferral on this subject will unfortunately be unavailing. I am disappointed that we were unable to limit the dispute presented to the Court, but will endeavor to continue working well together going forward.

We oppose your motion for leave to file a 25 page brief.

Jack

From: Kenneth Parreno <Kparreno@MALDEF.org>
Sent: Thursday, June 23, 2022 9:20 PM
To: Jack DiSorbo <Jack.DiSorbo@oag.texas.gov>; Nina Perales <nperales@MALDEF.org>
Cc: dfox@elias.law; pchaudhuri@lawyerscommittee.org; Patrick Sweeten <Patrick.Sweeten@oag.texas.gov>; Will Thompson <Will.Thompson@oag.texas.gov>; Courtney Corbello <Courtney.Corbello@oag.texas.gov>
Subject: RE: LULAC v. Abbott, 3:21-cv-259: Final Meet and Confer Regarding Documents Withheld by Defendant Abbott

Hi Jack,

Thank you for your response. I did not see a response in your email to our request that you provide Defendants' position on our joint motion to exceed the page limit for our joint motion to compel. We would appreciate a response regarding that request by tomorrow (Friday, June 24, 2022) at 12pm CT.

We will hold off on filing our joint motion to compel until tomorrow afternoon (Friday, June 24, 2022). If, after reviewing my email, you would still like to meet to discuss your position on these documents, we're available tomorrow (Friday, June 24, 2022) before 1pm CT to discuss. If you would like to meet, please let me know what time would work for you.

After reviewing your email, our position remains that all of the documents I identified in my prior email should be disclosed, and that the privileges you assert over those documents do not apply, for the reasons already articulated across our multiple meetings and letters. Regarding the 23 documents you have identified, the Supplemental Privilege Log, along with further elaboration in your email, offers no more than conclusory and boilerplate statements that "legal advice" was given. In any event, these documents concern (a) facts, not legal advice, (b) advice on political, strategic, or policy issues, and/or (c) were not created in anticipation of litigation. Moreover, for any document that was shared outside of the Office of the Governor, any claim of attorney-client privilege or work product doctrine has been waived.

Regarding the relevance of the 23 documents you listed, given their subject matter, they pertain to the process and/or circumstances surrounding the enactment of the challenged redistricting legislation, and some documents

contain communications that may reveal the intent of the legislators who enacted that legislation, especially given that at least some of the documents have been shared with legislative staff. Thus, the documents may be relevant to both the intent- and effects-based claims brought by Plaintiffs.

As I said, please let me know if you'd like to meet tomorrow, and let me know whether you oppose Plaintiffs' joint motion to exceed the page limit.

Thanks,
Kenneth

Kenneth Parreno
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From: Jack DiSorbo [<mailto:Jack.DiSorbo@oag.texas.gov>]
Sent: Thursday, June 23, 2022 7:11 AM
To: Kenneth Parreno; Nina Perales
Cc: dfox@elias.law; pchaudhuri@lawyerscommittee.org; Patrick Sweeten; Will Thompson; Courtney Corbello
Subject: RE: LULAC v. Abbott, 3:21-cv-259: Final Meet and Confer Regarding Documents Withheld by Defendant Abbott

Kenneth and Nina,

Thank you for your email. I want to briefly address my hope that through additional discussion we can limit the scope of our disagreement. To be sure, for some documents, I think our positions are too far apart to reach agreement. But I don't think the same is true for others. In particular, consider the documents "related to draft proclamation of special session." These documents are quite literally drafts of a proclamation calling a third special session. They were prepared by attorneys and other OOG staff, as the privilege log indicates. In preparing these drafts, and by advising on their preparation, OOG attorneys gave legal advice as to the required content of these drafts, and their compliance with applicable law. These drafts were then sent in "confidential communications" to members of the OOG staff, including attorneys. These messages themselves also contained commentary and other legal advice regarding the drafts. All of this information is provided in the privilege log.

If I recall correctly, your previous objections regarding these entries were that you were unable to ascertain (i) whether attorneys were involved in the preparing of the documents and sending of the messages, and (ii) the subject and purpose of the documents and communications. We have endeavored to provide that additional information here. Do you have additional objections to these entries? I struggle to see how the attorney client and attorney work product privileges would not apply here. Moreover, I do not understand how these documents are at all related to the LULAC, NAACP, and Abuabara plaintiffs' claims. What is your relevance basis for seeking these documents? Consider whether it would be more expedient to present your motion without these entries (understanding of course that you may want to maintain your objections to those entries without moving to compel them). I think we would all prefer to avoid presenting unnecessary argument to the Court.

For reference, the documents and communications related to the draft proclamation are as follows: DOC_0356555, DOC_0356556, DOC_0356557, DOC_0356571, DOC_0356578, DOC_0356579, DOC_0356580, DOC_0356581, DOC_03565802, DOC_0356583, DOC_0356584, DOC_0356585, DOC_0356590, DOC_0356591, DOC_0356592, DOC_0356593, DOC_0356594, DOC_0356595, DOC_0356596, DOC_0356597, DOC_0356604, DOC_0356609, and DOC_0356610.

I would appreciate the opportunity to confer regarding these documents. Do you have time in the next few days? You may be aware that I'm in Representative Lujan's deposition today. As I stated, I honestly think we may be able to come to an understanding on these documents (which constitute the majority of the entries on the log).

Jack

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From: Kenneth Parreno <kparreno@MALDEF.org>
Sent: Wednesday, June 22, 2022 3:41 PM
To: Patrick Sweeten <Patrick.Sweeten@oag.texas.gov>; Will Thompson <Will.Thompson@oag.texas.gov>; Jack DiSorbo <Jack.DiSorbo@oag.texas.gov>; Courtney Corbello <Courtney.Corbello@oag.texas.gov>
Cc: dfox@elias.law; pchaudhuri@lawyerscommittee.org; Nina Perales <nperales@MALDEF.org>
Subject: LULAC v. Abbott, 3:21-cv-259: Final Meet and Confer Regarding Documents Withheld by Defendant Abbott

Counsel,

Thank you for providing a Supplemental Privilege Log for Defendant Abbott (see attached) in response to the document requests of LULAC Plaintiffs, Abuabara Plaintiffs, and Texas NAACP ("Plaintiffs"). I write to address two matters related to the Supplemental Privilege Log, and request a response to both matters by 5pm CT tomorrow, June 23, 2022.

First, it is our understanding that you are withholding the documents listed in the attached Supplemental Privilege Log based on your assertions of one or more of the following: legislative privilege, deliberative-process privilege, attorney-client privilege, and work product doctrine. In our meet and confers and correspondence, Plaintiffs have taken the position that these privileges do not apply, for the reasons explained in those meetings and correspondence. In light of the disagreement over whether Abbott may withhold documents based on the privileges he asserts, and our meetings and correspondence attempting to resolve the disagreement, Plaintiffs intend to file a joint motion to compel tomorrow at 5pm CT, seeking disclosure of all documents listed in the Supplemental Privilege Log except for the following: DOC_0356558, DOC_0356559, DOC_0356575, and DOC_0356576. As one last effort to resolve this matter without Court intervention, we are reaching out to determine which, if any, of the documents you would produce in light of our position on the

asserted privileges. Please indicate your position on Plaintiffs' request for these documents by 5pm CT tomorrow (Thursday, June 23, 2022).

Second, pursuant to Local Rule 7(C), Plaintiffs intend to file a motion for leave to exceed the page limit for a discovery-related motion, seeking to file a motion to compel that shall not exceed 25 pages, exclusive of the caption, signature block, etc. Plaintiffs seek this page-limit extension to address fully each of the privileges Abbott asserts, and the extension is necessary given the consolidated nature of the motion. Please let us know whether you oppose Plaintiffs' motion for leave to exceed the page limit.

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June 22, 2021

The Honorable Gina M. Raimondo
Secretary of Commerce
United States Department of Commerce
1401 Constitution Ave NW
Washington, DC 20230

Dear Secretary Raimondo,

We write to you in regard to a matter of utmost importance: the 2020 Census. While we recognize the difficulties associated with completing a decennial census amid a pandemic, the ongoing delay in the release of 2020 Census redistricting data places our states in a nearly impossible situation to redraw lines prior to the 2022 election cycle. Consequently, we urge you to release redistricting data this month or as soon as possible prior to the delayed release date of September 30, 2021, and the release of the “legacy format” data on August 16, 2021.

Over the course of the past year, states and commonwealths played an integral part in ensuring the 2020 Census achieved a complete and accurate count of persons living in the United States on April 1, 2020. States and commonwealths have worked in conjunction with the U.S. Census Bureau (the Bureau) to inform Americans of the importance of the 2020 Census and encourage them to complete their questionnaires. In addition, our state and local complete count committees walked alongside the Bureau to ensure local communities were engaged, and while the COVID-19 pandemic led to the cancellation of many planned events, our complete count committees adjusted and leveraged their online presence to achieve a complete count.

States aided the Bureau within the Bureau’s fluctuating timelines for self-response and non-response follow-up (NERFU) in good faith. Yet, we are now facing a nearly half-year delay beyond the statutory deadline for receiving redistricting data. This delay places an unreasonable burden on our states and undermines public trust in the foundations of our democratic republic.

As you know, the U.S. Constitution and state constitutions task state governments with redistricting their respective congressional and legislative districts in the year immediately following the decennial census. To do so, states have historically received apportionment data in December of the year of the census and redistricting data in February or March of the following year—two to three months later, allowing states time to perform redistricting work in the spring and summer consistent with various state constitutional and statutory deadlines.

As a departure from the traditional timeline, the Bureau released 2020 apportionment data in April 2021, nearly four months behind schedule, which should result in the delivery of 2020 redistricting data by June or July of this year. However, it is our understanding that the Bureau will not release redistricting data until on or about September 30, 2021, with a potential release of legacy data sometime in mid-to-late August

June 22, 2021
Page 2 of 2

2021. The extended timeline represents a six-to-seven-month delay of redistricting data and is nearly double the conventional length of time between releasing both data sets.

Based on affidavits filed in federal court by the Bureau, it appears that nearly all of the data processing necessary for the public release of the redistricting data will be complete by June 24, 2021. Further delaying the release of redistricting data negatively impacts redistricting efforts nationwide, places state governments in an unnecessarily precarious position, and presents compounding delays in operations at every level of government.

Districts for the U.S. House of Representatives cannot be drawn until the data has been released. Districts for state legislatures also cannot be drawn until this data has been released. Districts for county, parish, township, and municipal governing bodies cannot be drawn until states have had the opportunity to draw congressional and state legislative districts. Lastly, districts for school district seats cannot be drawn until county, parish, township, and municipal governing bodies have had the opportunity to draw their own respective districts.

As a result of such negative impacts to our constitutional responsibilities, we seek the release of redistricting data as soon as possible—and in line with traditional timelines—so that states may begin to perform important redistricting tasks on behalf of our constituents.

Thank you for your attention to this important matter and for your continued service to our great nation.

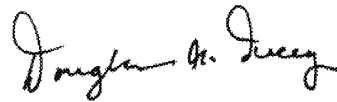
Sincerely,



Governor Asa Hutchinson
State of Arkansas



Governor Kay Ivey
State of Alabama



Governor Doug Ducey
State of Arizona



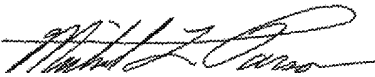
Governor Ron DeSantis
State of Florida



Governor Brian Kemp
State of Georgia



Governor Kim Reynolds
State of Iowa



Governor Mike Parson
State of Missouri



Governor Greg Gianforte
State of Montana



Governor Pete Ricketts
State of Nebraska



Governor Doug Burgum
State of North Dakota



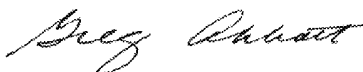
Governor Mike DeWine
State of Ohio



Governor Henry McMaster
State of South Carolina



Governor Bill Lee
State of Tennessee



Governor Greg Abbott
State of Texas



Governor Mark Gordon
State of Wyoming