

The Honorable Judge Andrew M. Edison  
United States District Court  
601 Rosenberg, Seventh Floor  
Galveston, TX 77550

April 7, 2023

**Re: *Petteway v. Galveston County*, Consolidated Case No. 3:22-cv-57**

Dear Judge Edison:

The parties seek a conference on a discovery dispute concerning Defendants' notice for a deposition of a representative for the United States under Federal Rule of Civil Procedure 30(b)(6), its necessity, and the content and scope of Defendants' examination topics.

On March 14, 2023, Defendants contacted the United States requesting a date to depose a representative of the United States and identifying 11 topics for examination. On March 21, the parties met and conferred over the necessity of the Rule 30(b)(6) deposition, but did not reach an agreement. On March 22, Defendants noticed the Rule 30(b)(6) deposition, including a narrower list of 10 topics. Ex. A. In subsequent email exchanges, the United States stated its position that alternative forms of discovery should replace a deposition, upon which the parties could not agree. Ex. B.

### **I. The United States' Position**

This is a statutory enforcement action in which the United States is enforcing Section 2 of the Voting Rights Act, 52 U.S.C. § 10301. A Rule 30(b)(6) deposition of a federal agency representative in such a statutory enforcement action is not only atypical, but the topics on which Defendants seek examination are inappropriate because they are not relevant to any claim or defense, are not proportionate to the needs of the case, and would invade privileged material.

Courts, including this one, have regularly barred Rule 30(b)(6) depositions of enforcement agencies who, as here, conduct underlying investigations and also serve as trial counsel. *See, e.g., SEC v. Gandy*, Civil Action H-21-3672, 2023 WL 211005, at \*2-3 (S.D. Tex. Jan 17, 2023); *see also EEOC v. McCormick & Schmick's Seafood Rests., Inc.*, Civil Action WMN-08-CV-984, 2010 WL 2572809, at \*10 (D. Md. June 22, 2010). Rule 30(b)(6) depositions of law enforcement agencies are particularly inappropriate when they "amount[] to the equivalent of an attempt to depose the attorney for the other side." *SEC v. Rosenfeld*, No. 97 CIV 1467 (RPP), 1997 WL 576021, at \*2 (S.D. Fla. April 18, 2002). These depositions can then "embroil[] the parties and the court in controversies over the attorney client privilege and more importantly, involve[] forays into the area most protected by the work product doctrine—that involving an attorney's mental impressions or opinions." *SEC v. Morelli*, 143 F.R.D. 42, 47 (S.D.N.Y. 1992). Even if the United States' Rule 30(b)(6) representative is not an attorney of record on the matter, the testimony would still "require those attorneys to prepare other witnesses to testify," thus implicating work product and other privileges. *FTC v. U.S. Grant Res., LLC*, 2004 WL 1444951, at \*9-11 (E.D. La. June 25, 2004); *see also Morelli*, 143 F.R.D. at 47 (a Rule 30(b)(6) deposition of the SEC "constitutes an impermissible attempt by defendant to inquire into the mental processes and strategies of the SEC").

Finally, Defendants’ requests to depose the United States for what facts it considers important or how the United States intends to present its case at trial are inappropriate topics for examination because they implicate attorney-client privilege, deliberative process privilege, and work-product protections. *Morelli*, 143 F.R.D. at 47. These topics are similarly inappropriate when they “are available elsewhere and through other means.” *SEC v. Buntrock*, 217 F.R.D. 441, 446 (N.D. Ill. 2003). The United States has already provided Defendants with its disclosures of persons with knowledge of relevant facts, supplemented those disclosures<sup>1</sup>, disclosed its experts, and responded to much of the proposed topics in its answers to Defendants’ written discovery.

## II. Defendants’ Position

Plaintiff contends its representative’s deposition would be irrelevant, that various privileges apply, and Defendants can refer to Plaintiff’s written discovery responses in lieu of a deposition.

Plaintiff’s initial written discovery responses in December 2022 were not substantive and did not identify the individuals from whom the USA received information for this suit. On March 15th, the USA updated its discovery and privilege log, disclosing 69 individuals interviewed between November 22, 2021 and September 30, 2022. Defendants cannot depose all of the newly disclosed individuals between March 15th and the close of discovery on April 21st, especially where 20 depositions are already scheduled in this case during that time. Defendants may discover the facts disclosed to Plaintiff by these potential witnesses—as requested in topics 5 (communications relating to redistricting), 6 (facts relating to allegations about intentional vote dilution), and 10 (complaints of official discrimination). Nor are the topics for deposition irrelevant. The USA alleges the 2021 redistricting plan was enacted with the *purpose* of abridging the minority voting rights (FAC ¶111), that the “history and sequence of events” up to the 2021 plan’s adoption is “evidence” of discriminatory purpose (FAC ¶113), that minority residents “continue to suffer the effects of past discrimination in areas such as education and employment that hinder their ability to participate effectively in the political process” (FAC ¶100), and that facts exist that are “relevant to the requisite totality of the circumstances inquiry”, including “official racial discrimination” (FAC ¶¶94-95). The noticed topics are relevant.

Nor can the deposition be prohibited because it is of the USA in a Voting Rights Act case. It is well established that general claims of privilege do not *establish* a privilege. *See U.S. v. Rogan*, No. 02 C 3310, 2005 WL 8149543, at \*2 (N.D. Ill. Feb. 3, 2005) (government’s “general references” to privilege did not establish that the privilege applied). At minimum, Defendants may question a USA representative regarding the parameters of the claimed privileges. *See U.S. v. Educ. Mgmt. LLC*, No. 2:07-CV-00461, 2014 WL 1391142, at \*3–4 (W.D. Pa. Feb. 24, 2014), *report and recommendation adopted* (rejecting request to quash deposition on basis of broad invocation of work product, attorney client, and deliberative process privileges before any specific questions are asked of the deponent). In particular, the deliberative process privilege

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<sup>1</sup> On March 15, 2023, the United States supplemented its initial disclosures (served on July 12, 2022), listing the names of every individual whom the United States has identified as likely having discoverable factual information pursuant to Rule 26(a)(1)(A)(i). The supplemental disclosures added 12 individuals to the list of individuals included in the United States’ initial disclosures. Of the 12 individuals added, only six have not already been deposed in the case, and of those six individuals, two had already been disclosed by the other Consolidated Plaintiffs in their initial disclosures on July 12, 2022.

“cannot be asserted in the abstract”, and even so, Defendants may show that their need for the information outweighs the Government’s interest under that privilege. *Id.* at \*4. As in *Rogan* and the *Education Management* cases, a deposition of a government representative should not be prohibited.

Respectfully submitted, this the 7th day of April 2023.

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United States Attorney  
Southern District of Texas

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Assistant Attorney General  
Civil Rights Division

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*Counsel for Defendants*

**CERTIFICATE OF CONFERENCE**

Undersigned counsel hereby certifies that on March 21, 2023, at 2 P.M. Eastern, the following representatives of the Parties participated in a meet and confer telephone conference call:

Present for the United States: Bruce Gear, Catherine Meza, Tharuni Jayaraman, Zachary Newkirk, K'Shaani Smith, and Brittany Wake.

Present for Defendants: Angela Olalde, Jordan Raschke Elton, Joseph Russo, and Shawn Sheehy.

Dated: April 7, 2023

*/s/Catherine Meza* \_\_\_\_\_

Catherine Meza

# **Exhibit A**

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

TERRY PETTEWAY, THE HONORABLE  
DERRECK ROSE, MICHAEL MONTEZ,  
SONNY JAMES and PENNY POPE,  
*Plaintiffs,*

§  
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v.

Civil Action No. 3:22-cv-57

GALVESTON COUNTY, TEXAS, and  
HONORABLE MARK HENRY,  
in his official capacity as Galveston County  
Judge,  
*Defendants.*

§  
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§

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UNITED STATES OF AMERICA,  
*Plaintiff,*

§  
§  
§

v.

GALVESTON COUNTY, TEXAS,  
GALVESTON COUNTY  
COMMISSIONERS COURT, and  
HONORABLE MARK HENRY, in  
his official capacity as Galveston County  
Judge,  
*Defendants.*

§  
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§  
§

Civil Action No. 3:22-cv-93

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DICKINSON BAY AREA BRANCH  
NAACP, GALVESTON BRANCH NAACP,  
MAINLAND BRANCH NAACP,  
GALVESTON LULAC COUNCIL 151,  
EDNA COURVILLE, JOE A. COMPIAN,  
and LEON PHILLIPS,  
*Plaintiffs,*

§  
§  
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§

v.

Civil Action No. 3:22-cv-117

GALVESTON COUNTY, TEXAS,  
HONORABLE MARK HENRY, in  
his official capacity as Galveston County  
Judge, and DWIGHT D. SULLIVAN, in his  
official capacity as Galveston County Clerk

§  
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§

*Defendants.*

§

**NOTICE OF DEPOSITION OF THE CORPORATE REPRESENTATIVE OF  
PLAINTIFF UNITED STATES OF AMERICA**

TO: Plaintiff United States of America, through its counsel, Catherine Meza, 950 Pennsylvania Avenue NW, Washington, DC 20530.

PLEASE TAKE NOTICE that Defendants, by and through their counsel, will take the deposition of one or more designated representative(s) of **United States of America** pursuant to Fed. R. Civ. P. 30(b)(6) regarding the topics listed in the attached Exhibit A. Please designate one or more United States persons with the most particularized knowledge as to these topics.

The deposition will take place on **April 14, 2023, starting at 9:00 a.m. CST**, at the law office of Greer, Herz & Adams, LLP, One Moody Plaza, 18<sup>th</sup> Floor, Galveston, Texas 77551, or at another date, time and location agreed to by the parties.

The deposition will be taken before an authorized court reporter or other officer authorized by law to administer oaths, will be recorded by stenographic means, and will be recorded by video. The deposition will be taken according to the Federal Rules of Civil Procedure for the purpose of discovery, used as evidence at any hearing or trial, or any other purpose allowed by law.

THE PARTIES MAY ATTEND IN PERSON OR REMOTELY VIA ZOOM. The Zoom link and instructions from will be provided prior to the deposition.



Respectfully Submitted,

HOLTZMAN VOGEL BARAN  
TORCHINSKY & JOSEFIK PLLC

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*Counsel for Defendants*

**CERTIFICATE OF SERVICE**

I certify that a true and correct copy of the foregoing Notice of Deposition was served to all counsel of record via email on March 22, 2023.

/s/ Angie Olalde

## **EXHIBIT A**

### **DEFINITIONS**

1. The terms “you” or “your” means the Plaintiff entity being deposed, and all of its current and former employees, volunteers, staff, agents, consultants, and representatives.
2. The phrase “relating to” is to be understood in its broadest sense and shall include pertaining to, evidencing, reflecting, memorializing, or constituting.
3. The terms “any” and “all” mean “any and all.”
4. The terms “and” and “or” shall be construed conjunctively and disjunctively in each listed matter in order to request the broadest scope of information possible.
5. “Lawsuit” means the above-captioned matter.
6. “Complaint” means your live complaint.

### **TOPICS FOR EXAMINATION**

1. The facts surrounding Your decision to file this Lawsuit.
2. Your objection(s) to Galveston County commissioners court redistricting plans from 2010-present, including the bases for those objections.
3. Your nonprivileged communications relating to the subject matter of this Lawsuit and/or redistricting in Galveston County (including communications with Commissioner Holmes or any federal, state, or local party officials);
4. Your communications relating to redistricting in Galveston County during the 2010-2011 cycle.
5. Your communications relating to redistricting in Galveston County during the 2020-2021 cycle, including those relating to the Commissioners Precinct map adopted in November 2021.
6. Facts and information relating to Your claims and allegations in this Lawsuit (whether in Your Complaint, court filings, or discovery responses), including:
  - i. The facts relating to your allegation that there is a sufficiently large and geographically compact minority group, or groups, of voters to constitute a voting majority in a single-member district in Galveston County.
  - ii. The facts relating to Your allegation that black and Latino voters in Galveston County vote in a politically cohesive manner.

- iii. The facts relating to Your allegation that non-Hispanic white voters in Galveston County vote sufficiently as a bloc so as to usually defeat the preferred candidate of black and Latino voters in Galveston County.
  - iv. The facts supporting your allegation that the “2021 commissioners court redistricting plan . . . has both the result and intent of diluting the voting strength of the County’s minority voters . . . .”
  - v. The facts supporting your allegation that the adopted Commissioners Court plan has, or will have, a discriminatory result.
  - vi. The facts supporting your allegation that, under the totality of the circumstances, the political processes leading to nomination or election in Galveston County are not equally open to participation by members of a protected class of citizens.
7. How You would modify the 2021 Redistricting Plan to satisfy the claims You raise in this Lawsuit, or how You would redistribute resources based on the alleged impact of the 2021 Redistricting Plan.
  8. Your research into, or analysis of, the voting patterns of minority voters in Galveston County from 2010 to present.
  9. Your research into, or analysis of, the socioeconomic condition of Galveston County residents and socioeconomic disparities between Black, Hispanic, and White residents, including income, educational, housing, or employment disparities, and disparities in conditions of health or access to health-related services.
  10. Any complaint of discrimination based on race or membership in a language minority group in Galveston County or by any County agency or official, from January 1, 2010, to the present.

# **Exhibit B**

**From:** [Angela Olalde](#)  
**To:** [Meza, Catherine \(CRT\)](#); [Shawn Sheehy](#); [Sharon Norwood](#); [Joseph Russo](#); [Jordan Raschke Elton](#); [Dallin Holt](#); [Jonathan Lienhard](#); [Jason Torchinsky](#); [Mateo Forero](#); ["schen@texascivilrightsproject.org"](#); ["VRichardson@campaignlegalcenter.org"](#); ["bernadette@uclavrp.org"](#); ["chad@brazilanddunn.com"](#); ["KGarrett@willkie.com"](#); [Gear, Bruce \(CRT\)](#); ["hani@texascivilrightsproject.org"](#); ["hilaryhklein@scsj.org"](#); [Jayaraman, Tharuni \(CRT\)](#); ["joaquin@texascivilrightsproject.org"](#); ["RMancino@willkie.com"](#); ["MGaber@campaignlegalcenter.org"](#); ["neil@ngbaronlaw.com"](#); [Newkirk, Zachary \(CRT\)](#); ["nas@naslegal.com"](#); ["OdeNevers@campaignlegalcenter.org"](#); ["MPolizzano@willkie.com"](#); ["ASilberstein@willkie.com"](#); ["SLeeper@campaignlegalcenter.org"](#); ["sonni@uclavrp.org"](#); ["JSuriani@willkie.com"](#); ["DVall-llobera@willkie.com"](#); [Wake, Brittany \(CRT\)](#); ["Zachary@texascivilrightsproject.org"](#); ["MZhu@willkie.com"](#); [Smith, K'Shaani \(CRT\)](#)  
**Cc:** [Kathy Cox](#); [Jennifer Jimenez](#); [Belinda Busscher](#)  
**Subject:** [EXTERNAL] Re: Deposition notice - USA Representative  
**Date:** Monday, March 27, 2023 7:33:45 PM

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Hi Catherine, when we spoke last, you'd mentioned that you aren't prepared to stipulate that the USA will rely on its experts for any topic. Without something along those lines, I think we are entitled to depose a representative about the facts regarding the USA's case. If you have any suggestions though, please let me know.

Get Outlook for iOS <<https://aka.ms/o0ukef>>

---

From: Meza, Catherine (CRT) <[Catherine.Meza@usdoj.gov](mailto:Catherine.Meza@usdoj.gov)>  
Sent: Monday, March 27, 2023 5:30:05 PM  
To: Angela Olalde <[aolalde@greerherz.com](mailto:aolalde@greerherz.com)>; Shawn Sheehy <[ssheehy@HoltzmanVogel.com](mailto:ssheehy@HoltzmanVogel.com)>; Sharon Norwood <[snorwood@HoltzmanVogel.com](mailto:snorwood@HoltzmanVogel.com)>; Joseph Russo <[JRusso@greerherz.com](mailto:JRusso@greerherz.com)>; Jordan Raschke Elton <[jraschkeelton@greerherz.com](mailto:jraschkeelton@greerherz.com)>; Dallin Holt <[dholt@HoltzmanVogel.com](mailto:dholt@HoltzmanVogel.com)>; Jonathan Lienhard <[jlienhard@HoltzmanVogel.com](mailto:jlienhard@HoltzmanVogel.com)>; Jason Torchinsky <[jtorchinsky@HoltzmanVogel.com](mailto:jtorchinsky@HoltzmanVogel.com)>; Mateo Forero <[mforero@HoltzmanVogel.com](mailto:mforero@HoltzmanVogel.com)>; 'schen@texascivilrightsproject.org' <[schen@texascivilrightsproject.org](mailto:schen@texascivilrightsproject.org)>; 'VRichardson@campaignlegalcenter.org' <[VRichardson@campaignlegalcenter.org](mailto:VRichardson@campaignlegalcenter.org)>; 'bernadette@uclavrp.org' <[bernadette@uclavrp.org](mailto:bernadette@uclavrp.org)>; 'chad@brazilanddunn.com' <[chad@brazilanddunn.com](mailto:chad@brazilanddunn.com)>; 'KGarrett@willkie.com' <[KGarrett@willkie.com](mailto:KGarrett@willkie.com)>; Gear, Bruce (CRT) <[Bruce.Gear@usdoj.gov](mailto:Bruce.Gear@usdoj.gov)>; 'hani@texascivilrightsproject.org' <[hani@texascivilrightsproject.org](mailto:hani@texascivilrightsproject.org)>; 'hilaryhklein@scsj.org' <[hilaryhklein@scsj.org](mailto:hilaryhklein@scsj.org)>; Jayaraman, Tharuni (CRT) <[Tharuni.Jayaraman@usdoj.gov](mailto:Tharuni.Jayaraman@usdoj.gov)>; 'joaquin@texascivilrightsproject.org' <[joaquin@texascivilrightsproject.org](mailto:joaquin@texascivilrightsproject.org)>; 'RMancino@willkie.com' <[RMancino@willkie.com](mailto:RMancino@willkie.com)>; 'MGaber@campaignlegalcenter.org' <[MGaber@campaignlegalcenter.org](mailto:MGaber@campaignlegalcenter.org)>; 'neil@ngbaronlaw.com' <[neil@ngbaronlaw.com](mailto:neil@ngbaronlaw.com)>; Newkirk, Zachary (CRT) <[Zachary.Newkirk@usdoj.gov](mailto:Zachary.Newkirk@usdoj.gov)>; 'nas@naslegal.com' <[nas@naslegal.com](mailto:nas@naslegal.com)>; 'OdeNevers@campaignlegalcenter.org' <[OdeNevers@campaignlegalcenter.org](mailto:OdeNevers@campaignlegalcenter.org)>; 'MPolizzano@willkie.com' <[MPolizzano@willkie.com](mailto:MPolizzano@willkie.com)>; 'ASilberstein@willkie.com' <[ASilberstein@willkie.com](mailto:ASilberstein@willkie.com)>; 'SLeeper@campaignlegalcenter.org' <[SLeeper@campaignlegalcenter.org](mailto:SLeeper@campaignlegalcenter.org)>; 'sonni@uclavrp.org' <[sonni@uclavrp.org](mailto:sonni@uclavrp.org)>; 'JSuriani@willkie.com' <[JSuriani@willkie.com](mailto:JSuriani@willkie.com)>; 'DVall-llobera@willkie.com' <[DVall-llobera@willkie.com](mailto:DVall-llobera@willkie.com)>; Wake, Brittany (CRT) <[Brittany.Wake@usdoj.gov](mailto:Brittany.Wake@usdoj.gov)>; 'Zachary@texascivilrightsproject.org' <[Zachary@texascivilrightsproject.org](mailto:Zachary@texascivilrightsproject.org)>; 'MZhu@willkie.com' <[MZhu@willkie.com](mailto:MZhu@willkie.com)>; Smith, K'Shaani (CRT) <[K'Shaani.Smith@usdoj.gov](mailto:K'Shaani.Smith@usdoj.gov)>  
Cc: Kathy Cox <[Kcox@greerherz.com](mailto:Kcox@greerherz.com)>; Jennifer Jimenez <[JJimenez@greerherz.com](mailto:JJimenez@greerherz.com)>; Belinda Busscher <[bbusscher@greerherz.com](mailto:bbusscher@greerherz.com)>  
Subject: RE: Deposition notice - USA Representative

CAUTION:This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

Hello Angie,

I write to follow up on my email below from Wednesday, March 22. Could you please let us know before COB tomorrow, March 28, what written assurances you are seeking from the United States?

Thank you.

Catherine

From: Meza, Catherine (CRT)

Sent: Wednesday, March 22, 2023 7:41 PM

To: Angela Olalde <aolalde@greerherz.com>; Shawn Sheehy <ssheehy@HoltzmanVogel.com>; Sharon Norwood <snorwood@HoltzmanVogel.com>; Joseph Russo <JRusso@greerherz.com>; Jordan Raschke Elton <jraschkeelton@greerherz.com>; Dallin Holt <dholt@HoltzmanVogel.com>; Jonathan Lienhard <jlienhard@HoltzmanVogel.com>; Jason Torchinsky <jtorchinsky@HoltzmanVogel.com>; Mateo Forero <mforero@HoltzmanVogel.com>; 'schen@texascivilrightsproject.org' <schen@texascivilrightsproject.org>; 'VRichardson@campaignlegalcenter.org' <VRichardson@campaignlegalcenter.org>; 'bernadette@uclavrp.org' <bernadette@uclavrp.org>; 'chad@brazilanddunn.com' <chad@brazilanddunn.com>; 'KGarrett@willkie.com' <KGarrett@willkie.com>; Gear, Bruce (CRT) <Bruce.Gear@usdoj.gov>; 'hani@texascivilrightsproject.org' <hani@texascivilrightsproject.org>; 'hiliaryhklein@scsj.org' <hiliaryhklein@scsj.org>; Jayaraman, Tharuni (CRT) <Tharuni.Jayaraman@usdoj.gov>; 'joaquin@texascivilrightsproject.org' <joaquin@texascivilrightsproject.org>; 'RMancino@willkie.com' <RMancino@willkie.com>; 'MGaber@campaignlegalcenter.org' <MGaber@campaignlegalcenter.org>; 'neil@ngbaronlaw.com' <neil@ngbaronlaw.com>; Newkirk, Zachary (CRT) <Zachary.Newkirk@usdoj.gov>; 'nas@naslegal.com' <nas@naslegal.com>; 'OdeNevers@campaignlegalcenter.org' <OdeNevers@campaignlegalcenter.org>; 'MPolizzano@willkie.com' <MPolizzano@willkie.com>; 'ASilberstein@willkie.com' <ASilberstein@willkie.com>; 'SLeeper@campaignlegalcenter.org' <SLeeper@campaignlegalcenter.org>; 'sonni@uclavrp.org' <sonni@uclavrp.org>; 'JSuriani@willkie.com' <JSuriani@willkie.com>; 'DVall-Ilobera@willkie.com' <DVall-Ilobera@willkie.com>; Wake, Brittany (CRT) <Brittany.Wake@usdoj.gov>; 'Zachary@texascivilrightsproject.org' <Zachary@texascivilrightsproject.org>; 'MZhu@willkie.com' <MZhu@willkie.com>; Smith, K'Shaani (CRT) <K'Shaani.Smith@usdoj.gov>  
Cc: Kathy Cox <Kcox@greerherz.com>; Jennifer Jimenez <JJimenez@greerherz.com>; Belinda Busscher <bbusscher@greerherz.com>  
Subject: RE: Deposition notice - USA Representative

Hello Angie,

It remains our position that alternative forms of discovery or other mutually-acceptable approaches could provide you with any of the additional information you seek as set forth in the topics for examination. In order to assist in the Department's consideration of the request you and Mr. Russo made yesterday for certain commitments in writing from the United States, could you please describe the specific assurances you are seeking?

In addition, with respect to potential fact witnesses who could be called to testify at trial and whom Defendants could notice for depositions, we refer you to the United States' Supplemental Disclosures served on March 15, 2023. The supplemental disclosures lists every individual whom the United States has identified as likely having discoverable factual information.

Thank you.

Catherine

From: Angela Olalde <aolalde@greerherz.com<<mailto:aolalde@greerherz.com>>>  
Sent: Wednesday, March 22, 2023 3:26 PM  
To: Shawn Sheehy <ssheehy@HoltzmanVogel.com<<mailto:ssheehy@HoltzmanVogel.com>>>; Meza, Catherine (CRT) <Catherine.Meza@usdoj.gov<<mailto:Catherine.Meza@usdoj.gov>>>; Sharon Norwood <snorwood@HoltzmanVogel.com<<mailto:snorwood@HoltzmanVogel.com>>>; Joseph Russo <JRusso@greerherz.com<<mailto:JRusso@greerherz.com>>>; Jordan Raschke Elton <jraschkeelton@greerherz.com<<mailto:jraschkeelton@greerherz.com>>>; Dallin Holt <dholt@HoltzmanVogel.com<<mailto:dholt@HoltzmanVogel.com>>>; Jonathan Lienhard <jlienhard@HoltzmanVogel.com<<mailto:jlienhard@HoltzmanVogel.com>>>; Jason Torchinsky <jtorchinsky@HoltzmanVogel.com<<mailto:jtorchinsky@HoltzmanVogel.com>>>; Mateo Forero <mforero@HoltzmanVogel.com<<mailto:mforero@HoltzmanVogel.com>>>; 'schen@texascivilrightsproject.org' <schen@texascivilrightsproject.org<<mailto:schen@texascivilrightsproject.org>>>; 'VRichardson@campaignlegalcenter.org' <VRichardson@campaignlegalcenter.org<<mailto:VRichardson@campaignlegalcenter.org>>>; 'bernadette@uclavrp.org' <bernadette@uclavrp.org<<mailto:bernadette@uclavrp.org>>>; 'chad@brazilanddunn.com' <chad@brazilanddunn.com<<mailto:chad@brazilanddunn.com>>>; 'KGarrett@willkie.com' <KGarrett@willkie.com<<mailto:KGarrett@willkie.com>>>; Gear, Bruce (CRT) <Bruce.Gear@usdoj.gov<<mailto:Bruce.Gear@usdoj.gov>>>; 'hani@texascivilrightsproject.org' <hani@texascivilrightsproject.org<<mailto:hani@texascivilrightsproject.org>>>; 'hilaryhklein@scsj.org' <hilaryhklein@scsj.org<<mailto:hilaryhklein@scsj.org>>>; Jayaraman, Tharuni (CRT) <Tharuni.Jayaraman@usdoj.gov<<mailto:Tharuni.Jayaraman@usdoj.gov>>>; 'joaquin@texascivilrightsproject.org' <joaquin@texascivilrightsproject.org<<mailto:joaquin@texascivilrightsproject.org>>>; 'RMancino@willkie.com' <RMancino@willkie.com<<mailto:RMancino@willkie.com>>>; 'MGaber@campaignlegalcenter.org' <MGaber@campaignlegalcenter.org<<mailto:MGaber@campaignlegalcenter.org>>>; 'neil@ngbaronlaw.com' <neil@ngbaronlaw.com<<mailto:neil@ngbaronlaw.com>>>; Newkirk, Zachary (CRT) <Zachary.Newkirk@usdoj.gov<<mailto:Zachary.Newkirk@usdoj.gov>>>; 'nas@naslegal.com' <nas@naslegal.com<<mailto:nas@naslegal.com>>>; 'OdeNevers@campaignlegalcenter.org' <OdeNevers@campaignlegalcenter.org<<mailto:OdeNevers@campaignlegalcenter.org>>>; 'MPolizzano@willkie.com' <MPolizzano@willkie.com<<mailto:MPolizzano@willkie.com>>>; 'ASilberstein@willkie.com' <ASilberstein@willkie.com<<mailto:ASilberstein@willkie.com>>>; 'SLeeper@campaignlegalcenter.org' <SLeeper@campaignlegalcenter.org<<mailto:SLeeper@campaignlegalcenter.org>>>; 'sonni@uclavrp.org' <sonni@uclavrp.org<<mailto:sonni@uclavrp.org>>>; 'JSuriani@willkie.com' <JSuriani@willkie.com<<mailto:JSuriani@willkie.com>>>; 'DVall-llobera@willkie.com' <DVall-llobera@willkie.com<<mailto:DVall-llobera@willkie.com>>>; Wake, Brittany (CRT) <Brittany.Wake@usdoj.gov<<mailto:Brittany.Wake@usdoj.gov>>>; 'Zachary@texascivilrightsproject.org' <Zachary@texascivilrightsproject.org<<mailto:Zachary@texascivilrightsproject.org>>>; 'MZhu@willkie.com' <MZhu@willkie.com<<mailto:MZhu@willkie.com>>>; Smith, K'Shaani (CRT) <K'Shaani.Smith@usdoj.gov>  
Cc: Kathy Cox <Kcox@greerherz.com<<mailto:Kcox@greerherz.com>>>; Jennifer Jimenez <JJimenez@greerherz.com<<mailto:JJimenez@greerherz.com>>>; Belinda Busscher <bbusscher@greerherz.com<<mailto:bbusscher@greerherz.com>>>  
Subject: [EXTERNAL] Deposition notice - USA Representative

Catherine,

It was nice to speak with you yesterday. I changed a couple of our requested topics in the attached. Since we do not

yet have an agreed date for the deposition, I've noticed it for April 14th at our Galveston offices, but of course please let me know if a different date/place works for you, and we can work that out.

Thanks,

Angie

409-797-3262