EXHIBIT 1
ATTACHMENT B: PERSONS TO BE SERVED

Brian Began
Steve Bieda
Laura Blastic
Jase Bolger
Mark Burton
Barb Byrum
Lt. Gov. Brian Calley
Bill Carney
John Clark
Jeff Cobb
Shannon Dara
Eric Doster
Shelly Edgerton
Peter Ellsworth
Ralph Fiebig
Fred Hall
Richard Hammel
Timothy Hanson
Senator David Hildenbrand
Mark Holmes
Senator Joe Hune
Senator Bert Johnson
Senator Rick Jones
Scott Jones
Jim Kinsey
Senator Marty Knollenberg
Bob LaBrant
J. Lohrstorfer
Pete Lund
Senator Jim Marleau
Terry Marquardt
Ed McBroom
Robert McCann
Daniel McMaster
John Moolenaar
David Murley
David Nathan
Rick Outman
ATTACHMENT B: PERSONS TO BE SERVED

Al Pscholka
Senator John Proos
BJ Puchala
Gary Randall
Randy Richardville
Josh Ross
Ed Sarpolus
Robert Schostak
Paul Smith
Virgil Smith
Gov. Rick Snyder
Woodrow Stanley
Eric Swanson
Rob Surber
Stuart Talsma
David Tarrant
Jeff Timmer
Sharon Tyler
Ron Weiser
Gretchen Whitmer
Jeff Winston
Clerk, Michigan Senate
Clerk, Michigan House
Michigan Senate Republican Caucus
Michigan Senate Republican Communications Office
Michigan Senate Republican Policy Staff
Michigan Senate Democrat Caucus
Michigan Senate Democratic Communications Office
Michigan Senate Democratic Policy Staff
Michigan House Republican Caucus
Michigan House Republican Communications Office
Michigan House Republican Policy Staff
Michigan House Democratic Caucus
Michigan House Democratic Communications Office
Michigan House Democratic Policy Staff
Dickinson Wright P.L.L.C.
Michigan Chamber of Commerce
Michigan Republican Party
ATTACHMENT A: DOCUMENTS REQUESTED

DEFINITIONS AND INSTRUCTIONS

A. For each document withheld under claim of privilege, work-product doctrine, or relevancy, provide with respect to each document: (a) a description of the document, including the type of document, date of the document, number of pages, and the general nature of the document’s contents; (b) the identity of the person who prepared the document; (c) the identity of each person who has read the document or to whom the document has been circulated; and (d) a statement of the grounds on which the claim of privilege or right to withhold is based.

B. Pursuant to Rule 34(A)(1) of the Federal Rules of Civil Procedure, this request applies to all documents that are in the possession, custody, or control of the party upon whom the request is served. The terms “possession,” “custody,” and “control” should be given their broadest possible scope consistent with the discovery rules contained in Rule 26(B) of the Federal Rules of Civil Procedure.

C. If any document described in this request at any time was, but no longer is, in your possession, custody, control, or is no longer in existence, furnish the following information: (a) whether it has been transferred, voluntarily or involuntarily, to others; or (b) whether it has been otherwise disposed of or destroyed; and (c) state all of your knowledge as to the circumstances of its loss, transfer, or destruction.
D. If you object or otherwise decline to answer any portion of a request, provide all documents requested by that portion of the request to which you do not object or otherwise decline to answer. If you object to a request on the ground that it is too broad, provide all information that you concede is relevant. If you object to a request on the ground that to provide an answer would constitute an undue burden, provide all requested information that can be supplied without undertaking what you claim to be an undue burden. For those portions of a request to which you object or that you otherwise decline to respond, state the reason(s) for such objection or declination, whether any responsive materials are being withheld on the basis of that objection.

E. The terms “document” and “documents” are, unless otherwise indicated, synonymous and equal in scope to “documents or electronically stored information” as defined in Rule 34 of the Federal Rules of Civil Procedure. Any document bearing notations, marks, or writings of any kind different from the original shall be treated as an original document.

F. Documents are to be produced in native format.

G. The terms “relate to” or “related to” mean in whole or in part constituting, containing, embodying, reflecting, identifying, incorporating, referring to, dealing with, or in any way pertaining to.
H. The present tense includes the past and future tenses. The singular includes the plural, and the plural includes the singular. “Including” means “including but not limited to.” “And” and “or” encompass both “and” and “or.”

I. The terms “person” and “persons” include a natural person, individual, corporation, partnership, and any other business association or entity.

J. “Michigan Legislature” means the Michigan Senate and Michigan House of Representatives, including their constituent, subordinate, joint, or otherwise related committees (including the Technical Redistricting Committee), agencies, bureaus, councils, party and other caucuses, groups, individual members, staff, consultants, or attorneys.

K. “Michigan Redistricting Plans” means, collectively, the current legislative and congressional redistricting plans (defined below as “Current Apportionment Plan”); and all legislative and congressional redistricting plans (including partial plans, individual districts, or partial districts) for any Michigan legislative or congressional map that were conceived, drafted, proposed, discussed, or debated.

L. “2012 Michigan Redistricting” means the entire process of redistricting Michigan’s legislative and congressional maps for the 2012 – 2020 election cycle, and includes without limiting the generality of the foregoing, conception, discussion,
negotiation, preparation, drafting, analysis, legislation and implementation of any one or more of the Michigan Redistricting Plans.

M. “Current Apportionment Plan” means the three legislative redistricting maps derived from the final passage of Michigan S.B. 498 and Michigan H.B. 4780.

N. Unless otherwise defined, all words contained in these requests for production should be construed in accordance with their ordinary meaning or meanings in the English language.

DOCUMENTS

REQUEST NO. 1: All Michigan Redistricting Plans.

REQUEST NO. 2: All documents constituting or reflecting communications related to the 2012 Michigan Redistricting.

REQUEST NO. 3: All notes, summaries, reports, minutes, bills, amendments and any other documents, formal or informal, referring or relating to the 2012 Michigan Redistricting.

REQUEST NO. 4: All documents reflecting, referring to or relating to agreements with and/or payments to or from any person in connection with 2012 Michigan Redistricting.
REQUEST NO. 5: All documents reflecting amounts appropriated, billed and/or paid by any entity to any person in connection with the 2012 Michigan Redistricting.

REQUEST NO. 6: All data consulted and all analyses, forecasts, scenarios, simulations, models, and projections done in connection with the 2012 Michigan Redistricting.

REQUEST NO. 9: All documents constituting or reflecting, in whole or in part, communications to or from the Republican State Leadership Committee (RSCLC) or other national organizations (including their members and staff) relating in any way to the 2012 Michigan Redistricting or redistricting in general.

REQUEST NO. 10: All documents from or to, prepared or presented by, or related to Thomas Hofeller.


REQUEST NO. 12: All documents related or referring to “REDMAP”.
Dated: February 2018

Respectfully submitted,

FAEGRE BAKER DANIELS LLP

/s/ Joseph H. Yeager, Jr.

Mark Brewer (P35661)
GOODMAN ACKER P.C.
17000 West Ten Mile, Second Floor
Southfield, MI 48075
Telephone: 248-483-5000
Fax: 248-483-3131
MBrewer@goodmanacker.com

Joseph H. Yeager, Jr. (IN Bar No. 2083-49)
Harmony A. Mappes (IN Bar No. 27237-49)
FAEGRE BAKER DANIELS LLP
300 North Meridian Street, Suite 2700
Indianapolis, IN 46204
Telephone: 317-237-0300
Fax: 317-237-1000
Jay.Yeager@FaegreBD.com
Harmony.Mappes@FaegreBD.com

Counsel for Plaintiffs