

# 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 (RSLC) 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. 11:** All PowerPoints or other outlines or presentations entitled “Redistricting 2010: Preparing for Success”; “Congressional Redistricting: Drawing Maps for the Next Five Elections”; REDMAP Political Report June 2010”; and “REDMAP Political Report July 2010.”

**REQUEST NO. 12:** All documents related or referring to “REDMAP”.



Dated: February [REDACTED], 2018

Respectfully submitted,

FAEGRE BAKER DANIELS LLP

/s/ Joseph H. Yeager, Jr.

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