

Exhibit 7

Portorreal, Newton (x2854)

From: Michael Beato <mbeato@HoltzmanVogel.com>
Sent: Tuesday, June 13, 2023 4:55 PM
To: Li, Alvin (x2184); Halper, Michael (x2336); Djang, Catherine (x2817)
Subject: Common Cause v. Byrd: Discovery

Caution: External Email!

Good afternoon, everyone,

Michael and Catherine: I hope you enjoyed your time in Tallahassee.

Alvin: good speaking with you today.

Just so everyone's on the same page:

- Alvin spoke with me about Tom Bryan's deposition—five hours, over Zoom, under the same terms of Kelly and Foltz, and sometime in the next two weeks. I told Alvin that I would take that to my team and discuss.
- Foltz's virtual deposition is now on June 20 and 21, starting at 10:00 AM EST
- My side is no longer seeking depositions for the organizational plaintiffs, and we don't need any other discovery from the individual plaintiffs—including affidavits.
 - I had one question on the organizational-plaintiffs' productions, just because there were a lot of emails going around: the final document productions for Common Cause is 220 documents, FairDistricts is 20, and NAACP is 3? I just want to make sure I didn't overlook anything.

Thanks as always,

-Michael



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