

**From:** [Greim, Edward D.](#)  
**To:** [Stuart Naifeh](#); [Alyssa Riggins](#); [Tyler, Jackson](#); [Brennan Bowen](#); [Phil Gordon](#); [Jason Torchinsky](#); [Paul@paulhurdawoffice.Com](#); [Mueller, Matthew](#); [Jones, Carey](#); [Aguinaga, Ben](#); [Brungard, Morgan](#); [Graves, Katie](#); [Badell, Rebekah](#); [Kathryn Sadasivan](#); [Sara Rohani](#); [Victoria Wenger](#); [Jonathan Hurwitz](#); [John Adcock](#); [Amitav Chakraborty](#); [Adam Savitt](#); [arielle McTootle](#); [Sarah Brannon](#); [Megan Keenan](#); [Nora Ahmed](#); [Alora Thomas-Lundborg](#); [D Hessel](#)  
**Cc:** [John Walsh](#); [Phil Strach](#); [Tom Farr](#); [Cassie Holt](#)  
**Subject:** RE: Callais v. Landry; Defendant's Objections and Responses to Plaintiffs' RFPDs  
**Date:** Wednesday, March 20, 2024 8:57:17 AM  
**Attachments:** [image001.png](#)

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Dear Stuart:

The first discovery to be produced is what you received Monday. The complete requests Plaintiffs made of the Secretary of State are included in the Secretary's response, which was timely made. As a courtesy, we'll send you the requests themselves, which were propounded before the Court ruled that you would be a provisional party in the event of any proceeding, post-trial, to take up remedial issues. As you can see, the discovery had nothing to do with that issue. The parties have fully complied with their obligations under the FRCPs.

We recognize that the court has now admitted your clients as parties to the liability phase for a limited purpose. You will receive our required disclosures on Friday—including the map files you requested informally and (we believe, improperly at that time) via discovery. We will expect to receive from you your own reports and materials on Friday.

Finally, you claim that our communication to you last week left a "misleading impression." We don't understand this complaint, as our promise was to provide you with each production when made, even though at that time, that wasn't our obligation under the rules. That's what you have received so far. You will continue to get productions at the time they are exchanged, and now you will also get the requests when made. We have one outstanding request that isn't yet due, and we will send that to you later today.

Eddie

Edward D. Greim

**Office:** (816) 256-3181 | **Direct:** (816) 256-4144



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1100 Main Street, Suite 2700  
Kansas City, MO 64105

**EXHIBIT**

**C**

exhibitsticker.com

**From:** Stuart Naifeh <snaifeh@naacpldf.org>

**Sent:** Tuesday, March 19, 2024 6:28 PM

**To:** Alyssa Riggins <alyssa.riggins@nelsonmullins.com>; Tyler, Jackson <jtyler@gravesgarrett.com>; Brennan Bowen <bbowen@HoltzmanVogel.com>; Greim, Edward D.

<EDGreim@gravesgarrett.com>; Phil Gordon <pgordon@HoltzmanVogel.com>; Jason Torchinsky

<jtorchinsky@HoltzmanVogel.com>; Paul@paulhurdlawoffice.Com; Mueller, Matthew

<mmueller@gravesgarrett.com>; Jones, Carey <JonesCar@ag.louisiana.gov>; Aguinaga, Ben

<AguinagaJ@ag.louisiana.gov>; Brungard, Morgan <BrungardM@ag.louisiana.gov>; Graves, Katie

<kgraves@gravesgarrett.com>; Badell, Rebekah <RBadell@gravesgarrett.com>; Kathryn Sadasivan

<ksadasivan@naacpldf.org>; Sara Rohani <Srohani@naacpldf.org>; Victoria Wenger

<vwenger@naacpldf.org>; Jonathan Hurwitz <jhurwitz@paulweiss.com>; John Adcock

<jnadcock@gmail.com>; Amitav Chakraborty <achakraborty@paulweiss.com>; Adam Savitt

<asavitt@paulweiss.com>; arielle McTootle <amctootle@paulweiss.com>; Sarah Brannon

<sbrannon@aclu.org>; Megan Keenan <MKeenan@aclu.org>; Nora Ahmed <Nahmed@laaclu.org>;

Alora Thomas-Lundborg <tthomaslundborg@law.harvard.edu>; D Hessel

<dessel@law.harvard.edu>

**Cc:** John Walsh <john@scwllp.com>; Phil Strach <phil.strach@nelsonmullins.com>; Tom Farr

<tom.farr@nelsonmullins.com>; Cassie Holt <cassie.holt@nelsonmullins.com>

**Subject:** Re: Callais v. Landry; Defendant's Objections and Responses to Plaintiffs' RFPDs

Plaintiffs' Counsel,

Yesterday, we received the email below from the Secretary's counsel attaching responses to document requests you propounded. We never received a copy of the original requests. Under FRCP 5, you are required to serve all discovery documents on all parties, and the *Robinson* intervenors have been parties to this litigation since February 26, when the court first granted our motion to intervene in part. In addition, on March 7, we contacted you and asked to be provided with copies of all discovery requests and responses that had been served to date, and you responded that you would serve those documents on us when they were provided to other parties, leaving the misleading impression that no discovery had yet been conducted. Please immediately provide us with a copy of the discovery requests that were directed to the Secretary as well as any other discovery that has been exchanged, including any initial disclosures pursuant to FRCP 26(a).

Kind regards,

**Stuart C. Naifeh** (he/him/él)

Manager, Redistricting Project



40 Rector Street, 5th Floor, New York, NY 10006

o: [212.217.1669](tel:212.217.1669) | c: [917.574.5846](tel:917.574.5846) | [snaifeh@naacpldf.org](mailto:snaifeh@naacpldf.org)

[naacpldf.org](http://naacpldf.org)

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**From:** Alyssa Riggins <[alyssa.riggins@nelsonmullins.com](mailto:alyssa.riggins@nelsonmullins.com)>

**Date:** Monday, March 18, 2024 at 4:43 PM

**To:** Tyler, Jackson <[jtyler@gravesgarrett.com](mailto:jtyler@gravesgarrett.com)>, Brennan Bowen <[bbowen@HoltzmanVogel.com](mailto:bbowen@HoltzmanVogel.com)>, Greim, Edward D. <[EDGreim@gravesgarrett.com](mailto:EDGreim@gravesgarrett.com)>, Phil Gordon <[pgordon@HoltzmanVogel.com](mailto:pgordon@HoltzmanVogel.com)>, Jason Torchinsky <[jtorchinsky@HoltzmanVogel.com](mailto:jtorchinsky@HoltzmanVogel.com)>, [Paul@paulhurdlawoffice.Com](mailto:Paul@paulhurdlawoffice.Com) <[Paul@paulhurdlawoffice.Com](mailto:Paul@paulhurdlawoffice.Com)>, Mueller, Matthew <[mmueller@gravesgarrett.com](mailto:mmueller@gravesgarrett.com)>, Jones, Carey <[JonesCar@ag.louisiana.gov](mailto:JonesCar@ag.louisiana.gov)>, Aguinaga, Ben <[AguinagaJ@ag.louisiana.gov](mailto:AguinagaJ@ag.louisiana.gov)>, Brungard, Morgan <[BrungardM@ag.louisiana.gov](mailto:BrungardM@ag.louisiana.gov)>, Graves, Katie <[kgraves@gravesgarrett.com](mailto:kgraves@gravesgarrett.com)>, Badell, Rebekah <[RBadell@gravesgarrett.com](mailto:RBadell@gravesgarrett.com)>, Kathryn Sadasivan <[ksadasivan@naacpldf.org](mailto:ksadasivan@naacpldf.org)>, Sara Rohani <[Srohani@naacpldf.org](mailto:Srohani@naacpldf.org)>, Victoria Wenger <[vwenger@naacpldf.org](mailto:vwenger@naacpldf.org)>, Stuart Naifeh <[snaifeh@naacpldf.org](mailto:snaifeh@naacpldf.org)>, Jonathan Hurwitz <[jhurwitz@paulweiss.com](mailto:jhurwitz@paulweiss.com)>, John Adcock <[jnadcock@gmail.com](mailto:jnadcock@gmail.com)>, Amitav Chakraborty <[achakraborty@paulweiss.com](mailto:achakraborty@paulweiss.com)>, Adam Savitt <[asavitt@paulweiss.com](mailto:asavitt@paulweiss.com)>, arielle McTootle <[amctootle@paulweiss.com](mailto:amctootle@paulweiss.com)>, Sarah Brannon <[sbrannon@aclu.org](mailto:sbrannon@aclu.org)>, Megan Keenan <[MKeenan@aclu.org](mailto:MKeenan@aclu.org)>, Nora Ahmed <[Nahmed@laaclu.org](mailto:Nahmed@laaclu.org)>, Alora Thomas-Lundborg <[tthomaslundborg@law.harvard.edu](mailto:tthomaslundborg@law.harvard.edu)>, D Hessel <[dhessel@law.harvard.edu](mailto:dhessel@law.harvard.edu)>, Mueller, Matthew <[mmueller@gravesgarrett.com](mailto:mmueller@gravesgarrett.com)>

**Cc:** John Walsh <[john@scwllp.com](mailto:john@scwllp.com)>, Phil Strach <[phil.strach@nelsonmullins.com](mailto:phil.strach@nelsonmullins.com)>, Tom Farr <[tom.farr@nelsonmullins.com](mailto:tom.farr@nelsonmullins.com)>, Cassie Holt <[cassie.holt@nelsonmullins.com](mailto:cassie.holt@nelsonmullins.com)>

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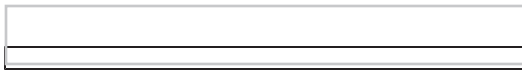
[Caution: EXTERNAL EMAIL]

Dear Counsel,

Please find attached Defendant Landry's Objections and Responses to Plaintiffs' Requests for Production of Documents.

Best,  
Alyssa

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ALYSSA RIGGINS SENIOR ASSOCIATE

[alyssa.riggins@nelsonmullins.com](mailto:alyssa.riggins@nelsonmullins.com)

301 HILLSBOROUGH STREET | SUITE 1400

RALEIGH, NC 27603

T 919.329.3810 F 919.329.3799

[NELSONMULLINS.COM](http://NELSONMULLINS.COM) [VCARD](#) [VIEW BIO](#)

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