

# **Exhibit B**



**Mark C. Moore**  
Member

January 24, 2022

**DELIVERED VIA EMAIL**

Chris Bryant  
Boroughs Bryant, LLC  
1122 Lady Street, Suite 208  
Columbia, SC 29201  
[chris@boroughsbryant.com](mailto:chris@boroughsbryant.com)

Re: House Defendants First Rolling Production

Dear Chris:

On behalf of Defendants James H. Lucas (in his official capacity as Speaker of the South Carolina House of Representatives), Chris Murphy (in his official capacity as Chairman of the South Carolina House of Representatives Judiciary Committee), and Wallace H. Jordan (in his official capacity as Chairman of the South Carolina House of Representatives Redistricting Ad Hoc Committee) (collectively, the “House Defendants”), we are producing a first set of documents responsive to Plaintiffs’ First Set of Requests for Production of Documents dated January 7, 2022. As we discussed and agreed, we are producing these documents on a rolling basis and we intend to produce additional documents this week. This production contains emails from the [redistricting@schouse.gov](mailto:redistricting@schouse.gov) email account.

As requested, the first production is being sent via FTP to all counsel of record for Plaintiffs. Because the productions are expected to be voluminous, we intend to send the productions to only the following counsel for the other defendants: (1) Rob Tyson for the Senate; (2) Liz Crum for the Election Commission; and (3) Thomas Limehouse for Governor McMaster. If counsel for the other defendants request that we provide copies of the productions to additional counsel, please let us know. The production includes 1,852 documents Bates labeled **SC\_HOUSE\_0000001 – SC\_HOUSE\_0010047**.

Please let us know if you have any questions or concerns.

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**Attorneys and Counselors at Law**

Chris Bryant  
January 24, 2022  
Page 2

Very truly yours,



Mark C. Moore

cc: Allen Chaney  
Antonio Ingram  
John Cusick  
Leah Aden  
Patricia Yan  
Raymond Audain  
Samantha Osaki  
Somil Trivedi  
Adriel Cepeda Derieux  
Stuart Naifeh  
Sarah Gryll  
Thomas Limehouse  
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La'Jessica Stringfellow  
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William Wilkins  
Andrew Mathias  
Jennifer Hollingsworth  
Michael Parente  
Hamilton Barber  
Erica Wells  
Konstantine Diamaduros  
Shannon Lipham  
Rhett Ricard



**Mark C. Moore**  
Member

January 25, 2022

**DELIVERED VIA EMAIL**

Chris Bryant  
Boroughs Bryant, LLC  
1122 Lady Street, Suite 208  
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[chris@boroughsbryant.com](mailto:chris@boroughsbryant.com)

Re: House Defendants Second Rolling Production

Dear Chris:

On behalf of Defendants James H. Lucas (in his official capacity as Speaker of the South Carolina House of Representatives), Chris Murphy (in his official capacity as Chairman of the South Carolina House of Representatives Judiciary Committee), and Wallace H. Jordan (in his official as Chairman of the South Carolina House of Representatives Redistricting Ad Hoc Committee) (collectively, the “House Defendants”), we are producing a second set of documents responsive to Plaintiffs’ First Set of Requests for Production of Documents dated January 7, 2022. As we discussed and agreed, we are producing these documents on a rolling basis and we intend to produce additional documents this week. This production contains documents from the House redistricting websites from the 2001, 2011, and 2021 redistricting cycles, with the corresponding request for production number attached.

As requested, the second production is being sent via FTP to all counsel of record for Plaintiffs. Because the productions are expected to be voluminous, we intend to send the productions to only the following counsel for the other defendants: (1) Rob Tyson for the Senate; (2) Liz Crum for the Election Commission; and (3) Thomas Limehouse, Grayson Lambert, and Michael Shedd for Governor McMaster. If counsel for the other defendants request that we provide copies of the productions to additional counsel, please let us know. The production includes 2,362 documents Bates labeled **SC\_HOUSE\_00010048 – SC\_HOUSE\_0035735**, which includes the 2001 website Bates labeled as **SC\_HOUSE\_0010048 - SC\_HOUSE\_0010307**, the 2011 website Bates labeled as **SC\_HOUSE\_0010308 - SC\_HOUSE\_0029881**, and the 2021 website Bates labeled as **SC\_HOUSE\_0029882 - SC\_HOUSE\_0035735**.

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**Attorneys and Counselors at Law**

Chris Bryant  
January 25, 2022  
Page 2

Please let us know if you have any questions or concerns.

Very truly yours,

A handwritten signature in blue ink, appearing to read "Mark C. Moore". The signature is fluid and cursive, with the first name "Mark" being the most prominent.

Mark C. Moore

cc: Allen Chaney  
Antonio Ingram  
John Cusick  
Leah Aden  
Patricia Yan  
Raymond Audain  
Samantha Osaki  
Somil Trivedi  
Adriel Cepeda Derieux  
Stuart Naifeh  
Sarah Gryll  
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Erica Wells  
Konstantine Diamaduros  
Shannon Lipham  
Rhett Ricard



**Mark C. Moore**  
Member

January 27, 2022

**DELIVERED VIA EMAIL**

Chris Bryant  
Boroughs Bryant, LLC  
1122 Lady Street, Suite 208  
Columbia, SC 29201  
[chris@boroughsbryant.com](mailto:chris@boroughsbryant.com)

Re: House Defendants' Third Rolling Production

Dear Chris:

On behalf of Defendants James H. Lucas (in his official capacity as Speaker of the South Carolina House of Representatives), Chris Murphy (in his official capacity as Chairman of the South Carolina House of Representatives Judiciary Committee), and Wallace H. Jordan (in his official capacity as Chairman of the South Carolina House of Representatives Redistricting Ad Hoc Committee) (collectively, the "House Defendants"), we are producing a third set of documents responsive to Plaintiffs' First Set of Requests for Production of Documents and Interrogatories dated January 7, 2022. As we discussed and agreed, we are producing these documents on a rolling basis and we intend to produce additional documents this week. This production contains legislative manuals dating back to 1980, which are responsive to Interrogatory No. 3.

As requested, the second production is being sent via FTP to all counsel of record for Plaintiffs. Because the productions are expected to be voluminous, we intend to send the productions to only the following counsel for the other defendants: (1) Rob Tyson for the Senate; (2) Liz Crum for the Election Commission; and (3) Thomas Limehouse, Grayson Lambert, and Michael Shedd for Governor McMaster. If counsel for the other defendants request that we provide copies of the productions to additional counsel, please let us know. The production includes 158 documents Bates labelled **SC\_HOUSE\_0035736 – SC\_HOUSE\_0061491**.

Please let us know if you have any questions or concerns.

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Chris Bryant  
January 27, 2022  
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Very truly yours,



Mark C. Moore

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Shannon Lipham  
Rhett Ricard



**Mark C. Moore**  
Member

January 28, 2022

**DELIVERED VIA EMAIL**

Chris Bryant  
Boroughs Bryant, LLC  
1122 Lady Street, Suite 208  
Columbia, SC 29201  
[chris@boroughsbryant.com](mailto:chris@boroughsbryant.com)

Re: House Defendants' Fourth Rolling Production

Dear Chris:

On behalf of Defendants James H. Lucas (in his official capacity as Speaker of the South Carolina House of Representatives), Chris Murphy (in his official capacity as Chairman of the South Carolina House of Representatives Judiciary Committee), and Wallace H. Jordan (in his official as Chairman of the South Carolina House of Representatives Redistricting Ad Hoc Committee) (collectively, the "House Defendants"), we are producing a fourth set of documents responsive to Plaintiffs' First Set of Requests for Production of Documents and Interrogatories dated January 7, 2022. As we discussed and agreed, we are producing these documents on a rolling basis. This production contains videos of meetings and files from the South Carolina Election Commission.

As requested, this fourth production is being sent via FTP to all counsel of record for Plaintiffs. Because the productions are expected to be voluminous, we intend to send the productions to only the following counsel for the other defendants: (1) Rob Tyson for the Senate; (2) Liz Crum for the Election Commission; and (3) Thomas Limehouse, Grayson Lambert, and Michael Shedd for Governor McMaster. If counsel for the other defendants request that we provide copies of the productions to additional counsel, please let us know. The production includes 32 documents Bates labelled **SC\_HOUSE\_0061492 – SC\_HOUSE\_0061523**. The videos are Bates labelled **SC\_HOUSE\_0061492 – SC\_HOUSE\_0061515** and the Election Commission files are Bates labelled **SC\_HOUSE\_0061516 – SC\_HOUSE\_0061523**.

Please let us know if you have any questions or concerns.

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Chris Bryant  
January 28, 2022  
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Very truly yours,



Mark C. Moore

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**Mark C. Moore**  
Member

February 1, 2022

**DELIVERED VIA EMAIL**

Chris Bryant  
Boroughs Bryant, LLC  
1122 Lady Street, Suite 208  
Columbia, SC 29201  
[chris@boroughsbryant.com](mailto:chris@boroughsbryant.com)

Re: House Defendants' Fifth Rolling Production

Dear Chris:

On behalf of Defendants James H. Lucas (in his official capacity as Speaker of the South Carolina House of Representatives), Chris Murphy (in his official capacity as Chairman of the South Carolina House of Representatives Judiciary Committee), and Wallace H. Jordan (in his official as Chairman of the South Carolina House of Representatives Redistricting Ad Hoc Committee) (collectively, the "House Defendants"), we are producing a fifth set of documents responsive to Plaintiffs' First Set of Requests for Production of Documents and Interrogatories dated January 7, 2022. As we discussed and agreed, we are producing these documents on a rolling basis. This production contains documents related to the public hearings. The RFP designations are attached.

As requested, this fifth production is being sent via FTP to all counsel of record for Plaintiffs. Because the productions are expected to be voluminous, we intend to send the productions to only the following counsel for the other defendants: (1) Rob Tyson for the Senate; (2) Liz Crum and Jane Trinkley for the Election Commission; and (3) Thomas Limehouse, Grayson Lambert, and Michael Shedd for Governor McMaster. If counsel for the other defendants request that we provide copies of the productions to additional counsel, please let us know. The production includes 91 documents Bates labelled **SC\_HOUSE\_0061524 – SC\_HOUSE\_0062043**.

Please let us know if you have any questions or concerns.

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Chris Bryant  
February 1, 2022  
Page 2

Very truly yours,



Mark C. Moore

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