

EXHIBIT 6

**IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION**

TENNESSEE STATE CONFERENCE OF)	
THE NAACP et al.,)	
)	
Plaintiffs,)	No. 3:23-cv-00832
)	
v.)	JUDGE ELI RICHARDSON
)	JUDGE ERIC E. MURPHY
WILLIAM B. LEE, et al.,)	JUDGE BENITA Y. PEARSON
)	
Defendants.)	
)	

DEFENDANTS’ RULE 26(a)(1) INITIAL DISCLOSURES

Pursuant to Fed. R. Civ. P. 26(a)(1), counsel for Defendants, Governor William B. Lee, Secretary of State Tre Hargett, Coordinator of Elections Mark Goins, the State Election Commission, and Donna Barrett, Judy Blackburn, Jimmy Eldridge, Mike McDonald, Secondra Meadows, Bennie Smith, and Kent Younce, in their official capacities as members of the State Election Commission, make the following disclosures. Defendants make these initial disclosures based on the information reasonably known to them at this time and reserve the right to amend or supplement these disclosures at any time permitted by the tribunal or Federal Rules of Civil Procedure.

- (i) **Name and, if known, the address and telephone number of each individual likely to have discoverable information—along with the subjects of that information—that the disclosing party may use to support its claims or defenses, unless the use would be solely for impeachment:**

The presumption of legislative good faith places the burden on Plaintiffs to prove their claims. Defendants incorporate by reference any individual that Plaintiffs

list on their initial disclosures. Defendants reserve the right to supplement these disclosures in light of the Supreme Court's decision in *Alexander*. Defendants further reserve the right to supplement these disclosures with the names of witnesses identified in the course of discovery likely to have discoverable information that Defendants may rely upon to support their claims or defenses.

(ii) A copy—or a description by category and location—of all documents, electronically stored information, and tangible things that the disclosing party has in its possession, custody, or control and may use to support its claims or defenses, unless the use would be solely for impeachment:

1. Maps underlying House Bill 1034, House Bill 1037, Senate Bill 0780, and Senate Bill 0781 as transmitted to Defendants from the Tennessee General Assembly or retrieved from tn-cot.maps.arcgis.com.

Defendants reserve the right to supplement these disclosures if they become aware of additional documents during the course of discovery that they may rely upon to support their claims or defenses.

(iii) damages: N/A

(iv) insurance agreements: N/A

Dated: November 14, 2023

ADAM K. MORTARA (BPR# 40089)
Lawfair LLC
40 Burton Hills Blvd., Suite 200
Nashville, TN 37215
(773) 750-7154
mortara@lawfairllc.com

Respectfully submitted,

/s/ Ryan Henry
RYAN NICOLE HENRY (BPR# 40028)
Assistant Attorney General
WHITNEY DOWNS HERMANDORFER
(BPR# 041054)
Assistant Solicitor General
MIRANDA H. JONES (BPR# 036070)
Senior Assistant Attorney General
PHILIP HAMMERSLEY (BPR# 041111)
Assistant Solicitor General
Office of the Tennessee Attorney General

P.O. Box 20207
Nashville, Tennessee 37202
(615) 532-2935
ryan.henry@ag.tn.gov
whitney.hermandorfer@ag.tn.gov
miranda.jones@ag.tn.gov
philip.hammersley@ag.tn.gov
Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on November 14, 2023, the undersigned filed the foregoing document via this Court's electronic filing system, which sent notice of such filing to the following counsel of record:

COUNSEL OF RECORD	PARTY REPRESENTED
<p>Phillip F. Cramer Sperling & Slater 150 3rd Avenue South, Suite 1100 Nashville, TN 37201 Tel.: 312-224-1512 pcramer@sperling-law.com</p> <p>Jon Greenbaum Ezra D. Rosenberg Pooja Chaudhuri Lawyers' Committee for Civil Rights Under Law 1500 K Street NW, Suite 900 Washington, DC 20005 Tel.: 202-662-8600 jgreenbaum@lawyerscommittee.org erosenberg@lawyerscommittee.org pchaudhuri@lawyerscommittee.org</p> <p>Jeffrey Loperfido Mitchell D. Brown Southern Coalition for Social Justice 1415 West Highway 54, Suite 101 Durham, NC 27707 Tel.: 919-323-3380 jeffloperfido@scsj.org mitchellbrown@scsj.org</p>	<p>Plaintiffs Tennessee State Conference of the NAACP, League of Women Voters of Tennessee, The Equity Alliance, Memphis A. Philip Randolph Institute, African American Clergy Collective of Tennessee, Judy Cummings, Brenda Gilmore, Ophelia Doe, Freda Player, and Ruby Powell-Dennis</p>

<p>George E. Mastoris Michelle D. Tuma Winston & Strawn LLP 200 Park Avenue New York, NY 10166 Tel.: 212-294-6700 gmastoris@winston.com mtuma@winston.com</p>	
---	--

/s/ Ryan Nicole Henry
RYAN NICOLE HENRY (BPR# 040028)
Assistant Attorney General

Counsel for Defendants