

EXHIBIT 4

From: [Ryan N. Henry](#)
To: [Mitchell D. Brown](#); [Pooja Chaudhuri](#); [mortara](#)
Cc: [Whitney Hermandorfer](#); [Miranda H. Jones](#); [Philip Hammersley](#); [Ezra Rosenberg](#); [Jeff Loperfido](#); [Mastoris, George](#); [Tuma, Michelle](#); [Alexander Davis](#); [Phillip Cramer](#); [Adrianne Spoto](#)
Subject: RE: [External]RE: Redistricting Case Discovery Responses
Date: Monday, April 8, 2024 1:21:23 PM
Attachments: [image002.png](#)
[image003.png](#)
[04.08.24 Letter to OC.pdf](#)
[Objections to Document Subpoena of Doug Himes-signed.pdf](#)
[Objections to Document Subpoenas of Legislators-signed.pdf](#)



Mitchell & Pooja,

Attached please find a letter outlining our position regarding the third-party subpoenas directed to members of the General Assembly and Counsel Doug Himes as well as objections to the same in accordance with Rule 45 of the Federal Rules of Civil Procedure. Please provide a few times this week that your team is available to meet and confer.

Thanks,
Ryan

Ryan Nicole Henry | Assistant Attorney General
Education and Employment Division
Office of the Tennessee Attorney General
UBS Building, 18th Floor
315 Deaderick Street, Nashville, Tennessee 37243
P: (615)532-2935



From: Mitchell D. Brown <mitchellbrown@scsj.org>
Sent: Tuesday, April 2, 2024 1:51 PM
To: Ryan N. Henry <Ryan.Henry@ag.tn.gov>; Pooja Chaudhuri <pchaudhuri@lawyerscommittee.org>; mortara <mortara@lawfairllc.com>
Cc: Whitney Hermandorfer <Whitney.Hermandorfer@ag.tn.gov>; Miranda H. Jones <Miranda.Jones@ag.tn.gov>; Philip Hammersley <Philip.Hammersley@ag.tn.gov>; Ezra Rosenberg <erosenberg@lawyerscommittee.org>; Jeff Loperfido <jeffloperfido@scsj.org>; Mastoris, George <GMastoris@winston.com>; Tuma, Michelle <MTuma@winston.com>; Alexander Davis <adavis@lawyerscommittee.org>; Phillip Cramer <pcramer@sperling-law.com>; Adrianne Spoto <Adrianne@scsj.org>
Subject: Re: [External]RE: Redistricting Case Discovery Responses

Hi Ryan,

Thank you for accepting service of the subpoena to Doug Himes. As for the deposition subpoenas, we would appreciate you checking with all those to whom we have issued subpoenas for documents so far:

- Curtis Johnson
- Dawn White
- Gary Hicks
- Jack Johnson
- Kevin Vaughan
- Pat Marsh
- Patsy Hazlewood
- Paul Rose
- William Lamberth
- Doug Himes

As we mentioned, we want to confirm both that you are authorized to accept service of deposition subpoenas and also that the legislators (and Doug Himes) will agree to sit for depositions.

Thank you,

Mitchell D. Brown
Southern Coalition for Social Justice
Senior Counsel, Voting Rights Section
SOLVE Network Coordinator
PO BOX 51280
Durham, NC 27717
919-323-3380 ext. 116

**Licensed in North Carolina and New York*

CONFIDENTIAL & PRIVILEGED

This communication is intended solely for the addressee. Any unauthorized review, use, disclosure or distribution is prohibited. If you believe this message has been sent to you in error, please notify the sender by replying to this transmission and delete the message without disclosing it. Thank you.

From: "Ryan N. Henry" <Ryan.Henry@ag.tn.gov>

Date: Monday, April 1, 2024 at 2:34 PM

To: Pooja Chaudhuri <pchaudhuri@lawyerscommittee.org>, mortara
<mortara@lawfairllc.com>, "Mitchell D. Brown" <mitchellbrown@scsj.org>

Cc: Whitney Hermandorfer <Whitney.Hermandorfer@ag.tn.gov>, "Miranda H. Jones" <Miranda.Jones@ag.tn.gov>, Philip Hammersley <Philip.Hammersley@ag.tn.gov>, Ezra Rosenberg <erosenberg@lawyerscommittee.org>, Jeff Loperfido <jeffloperfido@scsj.org>, "Mastoris, George" <GMastoris@winston.com>, "Tuma, Michelle" <MTuma@winston.com>, Alexander Davis <adavis@lawyerscommittee.org>, Phillip Cramer <pcramer@sperling-law.com>, Adrienne Spoto <Adrienne@scsj.org>
Subject: RE: [External]RE: Redistricting Case Discovery Responses

Hi Pooja,

I hope you enjoyed the Easter weekend! We are accepting service of the subpoena to Doug Himes as of today, April 1st. Please let us know which legislators you intend to issue deposition subpoenas, and we will follow up with them regarding service.

As a quick point of clarification - discovery in this case opened on November 9, 2023, and we received Plaintiffs' first set of written requests on December 1, 2023. Only document production and the scheduling of depositions was postponed until January 15, 2024.

Thanks!
Ryan

Ryan Nicole Henry | Assistant Attorney General
Education and Employment Division
Office of the Tennessee Attorney General
UBS Building, 18th Floor
315 Deaderick Street, Nashville, Tennessee 37243
P: (615)532-2935



From: Pooja Chaudhuri <pchaudhuri@lawyerscommittee.org>
Sent: Friday, March 29, 2024 1:16 PM
To: mortara <mortara@lawfairllc.com>; Mitchell D. Brown <mitchellbrown@scsj.org>
Cc: Ryan N. Henry <Ryan.Henry@ag.tn.gov>; Whitney Hermandorfer <Whitney.Hermandorfer@ag.tn.gov>; Miranda H. Jones <Miranda.Jones@ag.tn.gov>; Philip Hammersley <Philip.Hammersley@ag.tn.gov>; Ezra Rosenberg <erosenberg@lawyerscommittee.org>; Jeff Loperfido <jeffloperfido@scsj.org>; Mastoris, George <GMastoris@winston.com>; Tuma, Michelle <MTuma@winston.com>; Alexander Davis <adavis@lawyerscommittee.org>; Phillip Cramer <pcramer@sperling-law.com>; Adrienne Spoto <Adrienne@scsj.org>
Subject: Re: [External]RE: Redistricting Case Discovery Responses

Hi, Adam - it was certainly not our intention to disturb anyone's Easter observance. Many of us in this group observe the holiday ourselves.

We look forward to receiving a response from you after the holiday weekend. As for the timing of discovery, as you know, we agreed to pause discovery until January 15. As discovery is now finally underway, we hoped our discovery needs would be met through the documents produced by the State on a rolling basis, but given the documents we've received so far, we believe we will need to pursue some legislator discovery.

Thanks! Enjoy the weekend!

Pooja

--

Pooja Chaudhuri (*pronouns:* she/her)

Counsel, Voting Rights Project

Lawyers' Committee for Civil Rights Under Law

1500 K Street, NW, Suite 900

Washington, D.C. 20005

Dir: 202-662-8319 | Cell: 415-726-1414

www.lawyerscommittee.org

From: Adam Mortara <mortara@lawfairllc.com>

Sent: Thursday, March 28, 2024 6:27 PM

To: Mitchell D. Brown <mitchellbrown@scsj.org>

Cc: Ryan N. Henry <Ryan.Henry@ag.tn.gov>; Pooja Chaudhuri <pchaudhuri@lawyerscommittee.org>; Whitney Hermandorfer <Whitney.Hermandorfer@ag.tn.gov>; Miranda H. Jones <Miranda.Jones@ag.tn.gov>; Philip Hammersley <Philip.Hammersley@ag.tn.gov>; Ezra Rosenberg <erosenberg@lawyerscommittee.org>; Jeff Loperfido <jeffloperfido@scsj.org>; Mastoris, George <GMastoris@winston.com>; Tuma, Michelle <MTuma@winston.com>; Alexander Davis <adavis@lawyerscommittee.org>; Phillip Cramer <pcramer@sperling-law.com>; Adrienne Spoto <Adrienne@scsj.org>

Subject: Re: [External]RE: Redistricting Case Discovery Responses

Hi Mitchell,

We will have to get back to you on these questions after the Easter period. Tomorrow is a major holiday, so is Sunday, and so is Monday for many of us.

I will note that if plaintiffs wanted things “teed up” in a timely way, they sure have a funny way of showing it by waiting, what is it, five months or more since discovery opened to even ask about depositing legislators or sending subpoenas to them?

Happy Easter to all who celebrate His Resurrection.

Adam

Adam K. Mortara, Manager

Lawfair LLC

40 Burton Hills Blvd. Suite 200

Nashville, TN 37215

M: +1 773.750.7154

This message may contain confidential and privileged information. If it has been sent to you in error, please reply to advise the sender of the error and then immediately delete this message.

On Mar 28, 2024, at 16:57, Mitchell D. Brown <mitchellbrown@scsj.org> wrote:

Good Evening Ryan,

Thank you for accepting service of those subpoenas. We are attaching one additional subpoena, for Doug Himes. Please let us know if you will accept service of this subpoena or if we will need to serve him separately.

Also, we anticipate that we will be issuing deposition subpoenas for at least some of the legislators previously served. Can you confirm that you are authorized to accept service of deposition subpoenas as well and that the legislators will agree to sit for depositions in this matter? If any of the legislators are intending to oppose providing testimony, we'd like to get that issue teed up now rather than when attempting to schedule depositions later this spring.

Thank you,

Mitchell D. Brown

Southern Coalition for Social Justice

Senior Counsel, Voting Rights Section

SOLVE Network Coordinator

PO BOX 51280
Durham, NC 27717
919-323-3380 ext. 116

**Licensed in North Carolina and New York*

CONFIDENTIAL & PRIVILEGED

This communication is intended solely for the addressee. Any unauthorized review, use, disclosure or distribution is prohibited. If you believe this message has been sent to you in error, please notify the sender by replying to this transmission and delete the message without disclosing it. Thank you.

From: "Ryan N. Henry" <Ryan.Henry@ag.tn.gov>
Date: Monday, March 25, 2024 at 12:42 PM
To: "Mitchell D. Brown" <mitchellbrown@scsj.org>, Pooja Chaudhuri <pchaudhuri@lawyerscommittee.org>
Cc: mortara <mortara@lawfairllc.com>, Whitney Hermandorfer <Whitney.Hermandorfer@ag.tn.gov>, "Miranda H. Jones" <Miranda.Jones@ag.tn.gov>, Philip Hammersley <Philip.Hammersley@ag.tn.gov>, Ezra Rosenberg <erosenberg@lawyerscommittee.org>, Jeff Loperfido <jeffloperfido@scsj.org>, "Mastoris, George" <GMastoris@winston.com>, "Tuma, Michelle" <MTuma@winston.com>, Alexander Davis <adavis@lawyerscommittee.org>, Phillip Cramer <pcramer@sperling-law.com>, Adrienne Spoto <Adrienne@scsj.org>
Subject: RE: [External]RE: Redistricting Case Discovery Responses

Mitchell,

The Office of the Tennessee Attorney General will be representing legislators Curtis Johnson, Dawn White, Gary Hicks, Jack Johnson, Kevin Vaughan, Pat Marsh, Patsy Hazlewood, Paul Rose and William Lamberth in relation to the attached third-party subpoenas. We are accepting service of the same as of today, March 25th.

Best,
Ryan

Ryan Nicole Henry | Assistant Attorney General

Education and Employment Division
Office of the Tennessee Attorney General
UBS Building, 18th Floor
315 Deaderick Street, Nashville, Tennessee 37243
P: (615)532-2935

<image001.png>

From: Mitchell D. Brown <mitchellbrown@scsj.org>
Sent: Thursday, March 21, 2024 1:42 PM
To: Ryan N. Henry <Ryan.Henry@ag.tn.gov>; Pooja Chaudhuri
<pchaudhuri@lawyerscommittee.org>
Cc: mortara <mortara@lawfairllc.com>; Whitney Hermandorfer
<Whitney.Hermandorfer@ag.tn.gov>; Miranda H. Jones <Miranda.Jones@ag.tn.gov>;
Philip Hammersley <Philip.Hammersley@ag.tn.gov>; Ezra Rosenberg
<erosenberg@lawyerscommittee.org>; Jeff Loperfido <jeffloperfido@scsj.org>;
Mastoris, George <GMastoris@winston.com>; Tuma, Michelle
<MTuma@winston.com>; Alexander Davis <adavis@lawyerscommittee.org>; Phillip
Cramer <pcramer@sperling-law.com>; Adrienne Spoto <Adrienne@scsj.org>
Subject: Re: [External]RE: Redistricting Case Discovery Responses

Thank you!

Mitchell D. Brown
Southern Coalition for Social Justice
Senior Counsel, Voting Rights Section
SOLVE Network Coordinator
PO BOX 51280
Durham, NC 27717
919-323-3380 ext. 116

**Licensed in North Carolina and New York*

CONFIDENTIAL & PRIVILEGED

This communication is intended solely for the addressee. Any unauthorized review, use, disclosure or distribution is prohibited. If you believe this message has been sent to you in error, please notify the sender by replying to this transmission and delete the message without disclosing it. Thank you.

From: "Ryan N. Henry" <Ryan.Henry@ag.tn.gov>
Date: Thursday, March 21, 2024 at 2:39 PM
To: "Mitchell D. Brown" <mitchellbrown@scsj.org>, Pooja Chaudhuri

<pchaudhuri@lawyerscommittee.org>

Cc: mortara <mortara@lawfairllc.com>, Whitney Hermandorfer <Whitney.Hermandorfer@ag.tn.gov>, "Miranda H. Jones" <Miranda.Jones@ag.tn.gov>, Philip Hammersley <Philip.Hammersley@ag.tn.gov>, Ezra Rosenberg <erosenberg@lawyerscommittee.org>, Jeff Loperfido <jeffloperfido@scsj.org>, "Mastoris, George" <GMastoris@winston.com>, "Tuma, Michelle" <MTuma@winston.com>, Alexander Davis <adavis@lawyerscommittee.org>, Phillip Cramer <pcramer@sperling-law.com>, Adrienne Spoto <Adrienne@scsj.org>

Subject: RE: [External]RE: Redistricting Case Discovery Responses

Received. Thanks, Mitchell. We will follow up on Monday with an answer as to each legislator.

Ryan Nicole Henry | Assistant Attorney General
Education and Employment Division
Office of the Tennessee Attorney General
UBS Building, 18th Floor
315 Deaderick Street, Nashville, Tennessee 37243
P: (615)532-2935

<image002.png>

From: Mitchell D. Brown <mitchellbrown@scsj.org>

Sent: Wednesday, March 20, 2024 3:57 PM

To: Ryan N. Henry <Ryan.Henry@ag.tn.gov>; Pooja Chaudhuri <pchaudhuri@lawyerscommittee.org>

Cc: mortara <mortara@lawfairllc.com>; Whitney Hermandorfer <Whitney.Hermandorfer@ag.tn.gov>; Miranda H. Jones <Miranda.Jones@ag.tn.gov>; Philip Hammersley <Philip.Hammersley@ag.tn.gov>; Ezra Rosenberg <erosenberg@lawyerscommittee.org>; Jeff Loperfido <jeffloperfido@scsj.org>; Mastoris, George <GMastoris@winston.com>; Tuma, Michelle <MTuma@winston.com>; Alexander Davis <adavis@lawyerscommittee.org>; Phillip Cramer <pcramer@sperling-law.com>; Adrienne Spoto <Adrienne@scsj.org>

Subject: Re: [External]RE: Redistricting Case Discovery Responses

Good Afternoon Ryan and All,

Attached are Plaintiffs' third-party subpoenas to the following legislators:

- Curtis Johnson
- Dawn White
- Gary Hicks

- Jack Johnson
- Kevin Vaughan
- Pat Marsh
- Patsy Hazlewood
- Paul Rose
- William Lamberth

Please let us know if you are accepting service of each of the subpoenas or if we will need to serve any of the legislators separately.

Thank you,

Mitchell D. Brown
 Southern Coalition for Social Justice
 Senior Counsel, Voting Rights Section
 SOLVE Network Coordinator
 PO BOX 51280
 Durham, NC 27717
 919-323-3380 ext. 116

**Licensed in North Carolina and New York*

CONFIDENTIAL & PRIVILEGED

This communication is intended solely for the addressee. Any unauthorized review, use, disclosure or distribution is prohibited. If you believe this message has been sent to you in error, please notify the sender by replying to this transmission and delete the message without disclosing it. Thank you.

From: "Ryan N. Henry" <Ryan.Henry@ag.tn.gov>
Date: Monday, March 11, 2024 at 9:53 AM
To: Pooja Chaudhuri <pchaudhuri@lawyerscommittee.org>
Cc: mortara <mortara@lawfairllc.com>, Whitney Hermandorfer <Whitney.Hermandorfer@ag.tn.gov>, "Miranda H. Jones" <Miranda.Jones@ag.tn.gov>, Philip Hammersley <Philip.Hammersley@ag.tn.gov>, Ezra Rosenberg <erosenberg@lawyerscommittee.org>, "Mitchell D. Brown" <mitchellbrown@scsj.org>, Jeff Loperfido <jeffloperfido@scsj.org>, "Mastoris, George" <GMastoris@winston.com>, "Tuma, Michelle" <MTuma@winston.com>, Alexander Davis <adavis@lawyerscommittee.org>, Phillip Cramer <pcramer@sperling-

law.com>, Adrienne Spoto <Adrienne@scsj.org>

Subject: [External]RE: Redistricting Case Discovery Responses

Good morning,

Thank you for letting us know that you intend to send third party subpoenas to members of the General Assembly. Please forward each subpoena to the members of this litigation team, and we will determine which TNAG will accept service and represent the legislator.

Best,
Ryan

Ryan Nicole Henry | Assistant Attorney General
Education and Employment Division
Office of the Tennessee Attorney General
UBS Building, 18th Floor
315 Deaderick Street, Nashville, Tennessee 37243
P: (615)532-2935

<image003.png>

From: Pooja Chaudhuri <pchaudhuri@lawyerscommittee.org>

Sent: Thursday, March 7, 2024 1:34 PM

To: Ryan N. Henry <Ryan.Henry@ag.tn.gov>

Cc: mortara <mortara@lawfairllc.com>; Whitney Hermandorfer <Whitney.Hermandorfer@ag.tn.gov>; Miranda H. Jones <Miranda.Jones@ag.tn.gov>; Philip Hammersley <Philip.Hammersley@ag.tn.gov>; Ezra Rosenberg <erosenberg@lawyerscommittee.org>; Mitchell D. Brown <mitchellbrown@scsj.org>; Jeff Loperfido <jeffloperfido@scsj.org>; Mastoris, George <GMastoris@winston.com>; Tuma, Michelle <MTuma@winston.com>; Alexander Davis <adavis@lawyerscommittee.org>; Phillip Cramer <pcramer@sperling-law.com>; Adrienne Spoto <Adrienne@scsj.org>

Subject: Re: Redistricting Case Discovery Responses

Hi, Ryan - I sent an invite for 10 AM CT tomorrow! Let me know if you did not receive it.

Also, prior to tomorrow's meeting, we'd like to request a few items to facilitate a more productive conversation.

- In your email dated 3/1/2024, you stated that the AG's Office ran the requested search terms on the SOS's custodians' documents. And in your email dated 1/19/2024, you said that the SOS's office had identified relevant custodians and started gathering .pst files.
 - Before tomorrow's meeting, please provide us with the names and emails

- of those relevant custodians.
- Please also clarify the date range of the collection and whether you searched the custodians' emails only or whether you searched any other platforms such as text messages or slack messages.
- In your email dated 1/19/2024, you also mentioned that the AGs office was discussing the search process for individual commissioners and the state election commission.
 - Please identify the custodians for the commissioners and provide their names and emails.

Look forward to chatting more tomorrow.

thanks,
Pooja

--

Pooja Chaudhuri (pronouns: she/her)

Counsel, Voting Rights Project

Lawyers' Committee for Civil Rights Under Law

1500 K Street, NW, Suite 900

Washington, D.C. 20005

Dir: 202-662-8319 | Cell: 415-726-1414

www.lawyerscommittee.org

From: Ryan N. Henry <Ryan.Henry@ag.tn.gov>

Sent: Wednesday, March 6, 2024 2:17 PM

To: Pooja Chaudhuri <pchaudhuri@lawyerscommittee.org>

Cc: mortara <mortara@lawfairllc.com>; Whitney Hermendorfer <Whitney.Hermendorfer@ag.tn.gov>; Miranda H. Jones <Miranda.Jones@ag.tn.gov>; Philip Hammersley <Philip.Hammersley@ag.tn.gov>; Ezra Rosenberg <erosenberg@lawyerscommittee.org>; Mitchell D. Brown <mitchellbrown@scsj.org>; Jeff Loperfido <jeffloperfido@scsj.org>; Mastoris, George <GMastoris@winston.com>;

Tuma, Michelle <MTuma@winston.com>; Alexander Davis
<adavis@lawyerscommittee.org>; Phillip Cramer <pcramer@sperling-law.com>;
Adrianne Spoto <Adrianne@scsj.org>
Subject: RE: Redistricting Case Discovery Responses

No rush! Thanks, Pooja. Just wanted to make sure I blocked off time on the correct day.

Ryan Nicole Henry | Assistant Attorney General
Education and Employment Division
Office of the Tennessee Attorney General
UBS Building, 18th Floor
315 Deaderick Street, Nashville, Tennessee 37243
P: (615)532-2935

<image003.png>

From: Pooja Chaudhuri <pchaudhuri@lawyerscommittee.org>
Sent: Wednesday, March 6, 2024 1:14 PM
To: Ryan N. Henry <Ryan.Henry@ag.tn.gov>
Cc: mortara <mortara@lawfairllc.com>; Whitney Hermandorfer
<Whitney.Hermandorfer@ag.tn.gov>; Miranda H. Jones <Miranda.Jones@ag.tn.gov>;
Philip Hammersley <Philip.Hammersley@ag.tn.gov>; Ezra Rosenberg
<erosenberg@lawyerscommittee.org>; Mitchell D. Brown <mitchellbrown@scsj.org>;
Jeff Loperfido <jeffloperfido@scsj.org>; Mastoris, George <GMastoris@winston.com>;
Tuma, Michelle <MTuma@winston.com>; Alexander Davis
<adavis@lawyerscommittee.org>; Phillip Cramer <pcramer@sperling-law.com>;
Adrianne Spoto <Adrianne@scsj.org>
Subject: Re: Redistricting Case Discovery Responses

I haven't sent it yet. Thinking for Friday at 10 am ct/11 am et. I've been on the road this past week for work, hence the delay. Will send out the invite as soon as I can get to my computer!

Thanks! Pooja

From: Ryan N. Henry <Ryan.Henry@ag.tn.gov>
Sent: Wednesday, March 6, 2024 1:09:25 PM
To: Pooja Chaudhuri <pchaudhuri@lawyerscommittee.org>
Cc: mortara <mortara@lawfairllc.com>; Whitney Hermandorfer
<Whitney.Hermandorfer@ag.tn.gov>; Miranda H. Jones <Miranda.Jones@ag.tn.gov>;
Philip Hammersley <Philip.Hammersley@ag.tn.gov>; Ezra Rosenberg
<erosenberg@lawyerscommittee.org>; Mitchell D. Brown <mitchellbrown@scsj.org>;
Jeff Loperfido <jeffloperfido@scsj.org>; Mastoris, George <GMastoris@winston.com>;
Tuma, Michelle <MTuma@winston.com>; Alexander Davis

<adavis@lawyerscommittee.org>; Phillip Cramer <pcramer@sperling-law.com>;
Adrianne Spoto <Adrianne@scsj.org>

Subject: RE: Redistricting Case Discovery Responses

Hi Pooja,

I didn't receive a calendar invite. Would you mind resending? And were you thinking tomorrow or Friday?

Ryan

Ryan Nicole Henry | Assistant Attorney General
Education and Employment Division
Office of the Tennessee Attorney General
UBS Building, 18th Floor
315 Deaderick Street, Nashville, Tennessee 37243
P: (615)532-2935

<image003.png>

From: Pooja Chaudhuri <pchaudhuri@lawyerscommittee.org>
Sent: Monday, March 4, 2024 12:33 PM
To: Ryan N. Henry <Ryan.Henry@ag.tn.gov>
Cc: mortara <mortara@lawfairllc.com>; Whitney Hermandorfer <Whitney.Hermandorfer@ag.tn.gov>; Miranda H. Jones <Miranda.Jones@ag.tn.gov>; Philip Hammersley <Philip.Hammersley@ag.tn.gov>; Ezra Rosenberg <erosenberg@lawyerscommittee.org>; Mitchell D. Brown <mitchellbrown@scsj.org>; Jeff Loperfido <jeffloperfido@scsj.org>; Mastoris, George <GMastoris@winston.com>; Tuma, Michelle <MTuma@winston.com>; Alexander Davis <adavis@lawyerscommittee.org>; Phillip Cramer <pcramer@sperling-law.com>; Adrianne Spoto <Adrianne@scsj.org>
Subject: Re: Redistricting Case Discovery Responses

Thanks, Ryan. I'll send an invite for 10 am central.

From: Ryan N. Henry <Ryan.Henry@ag.tn.gov>
Sent: Friday, March 1, 2024 1:30 PM
To: Pooja Chaudhuri <pchaudhuri@lawyerscommittee.org>
Cc: mortara <mortara@lawfairllc.com>; Whitney Hermandorfer <Whitney.Hermandorfer@ag.tn.gov>; Miranda H. Jones <Miranda.Jones@ag.tn.gov>; Philip Hammersley <Philip.Hammersley@ag.tn.gov>; Ezra Rosenberg <erosenberg@lawyerscommittee.org>; Mitchell D. Brown <mitchellbrown@scsj.org>; Jeff Loperfido <jeffloperfido@scsj.org>; Mastoris, George <GMastoris@winston.com>; Tuma, Michelle <MTuma@winston.com>;

Alexander Davis <adavis@lawyerscommittee.org>; Phillip Cramer
<pcramer@sperling-law.com>; Adrienne Spoto <Adrienne@scsj.org>

Subject: RE: Redistricting Case Discovery Responses

Hi Pooja,

We are available for a meet and confer before 11am CT on Thursday and before 12pm CT on Friday. Feel free to send a calendar invitation.

And, yes, we ran the requested search terms on the Secretary of State custodians' documents. The corpus totaled 541,447 documents, and the search terms generated 85,470 hits. The hit counts per term are detailed in the attached spreadsheet, and the overinclusive terms are highlighted in yellow. We conducted a spot-review of the overinclusive terms to identify word combinations consistently producing irrelevant documents, and included that information as well. Hopefully it will be helpful as we try to narrow the scope of the results to something manageable! If you'd like to send over a revised list of terms by Wednesday, we can return an updated hit count sheet before the meet and confer.

Best,
Ryan

Ryan Nicole Henry | Assistant Attorney General
Education and Employment Division
Office of the Tennessee Attorney General
UBS Building, 18th Floor
315 Deaderick Street, Nashville, Tennessee 37243
P: (615)532-2935

<image003.png>

From: Pooja Chaudhuri <pchaudhuri@lawyerscommittee.org>

Sent: Friday, March 1, 2024 5:48 AM

To: Ryan N. Henry <Ryan.Henry@ag.tn.gov>

Cc: mortara <mortara@lawfairllc.com>; Whitney Hermandorfer
<Whitney.Hermandorfer@ag.tn.gov>; Miranda H. Jones <Miranda.Jones@ag.tn.gov>;
Philip Hammersley <Philip.Hammersley@ag.tn.gov>; Ezra Rosenberg
<erosenberg@lawyerscommittee.org>; Mitchell D. Brown <mitchellbrown@scsj.org>;
Jeff Loperfido <jeffloperfido@scsj.org>; Mastoris, George <GMastoris@winston.com>;
Tuma, Michelle <MTuma@winston.com>; Alexander Davis
<adavis@lawyerscommittee.org>; Phillip Cramer <pcramer@sperling-law.com>;
Adrienne Spoto <Adrienne@scsj.org>

Subject: Re: Redistricting Case Discovery Responses

Hi, Ryan! Happy Friday! Query below.

On, 1/19, we sent a list of search terms your way and requested that the AG's

office send a list of custodians who were searched. The AGs office acknowledged that it was in receipt of the search terms and stated it would provide a list of custodians and the number of hits. Can you please confirm you ran these terms, the names of custodians, and provide the hit counts?

We would propose a meet and confer to discuss the current set of documents, including the custodians, terms used to identify documents, etc. Please let us know when you are available on Thursday or Friday next week.

Thanks,

Pooja

From: Pooja Chaudhuri <pchaudhuri@lawyerscommittee.org>
Sent: Friday, January 19, 2024 6:21:54 PM
To: Ryan N. Henry <Ryan.Henry@ag.tn.gov>
Cc: Adam Mortara <mortara@lawfairllc.com>; Whitney Hermandorfer <Whitney.Hermandorfer@ag.tn.gov>; Miranda H. Jones <Miranda.Jones@ag.tn.gov>; Philip Hammersley <Philip.Hammersley@ag.tn.gov>; Ezra Rosenberg <erosenberg@lawyerscommittee.org>; Mitchell D. Brown <mitchellbrown@scsj.org>; Jeff Loperfido <jeffloperfido@scsj.org>; Mastoris, George <GMastoris@winston.com>; Tuma, Michelle <MTuma@winston.com>; Alexander Davis <adavis@lawyerscommittee.org>; Phillip Cramer <pcramer@sperling-law.com>
Subject: Re: Redistricting Case Discovery Responses

Thanks, Ryan! Will discuss with my team and follow up next week with any other questions or concerns we may have or if we feel we need to have a call. weekend!

From: Ryan N. Henry <Ryan.Henry@ag.tn.gov>
Sent: Friday, January 19, 2024 6:03 PM
To: Pooja Chaudhuri <pchaudhuri@lawyerscommittee.org>
Cc: Adam Mortara <mortara@lawfairllc.com>; Whitney Hermandorfer <Whitney.Hermandorfer@ag.tn.gov>; Miranda H. Jones <Miranda.Jones@ag.tn.gov>; Philip Hammersley <Philip.Hammersley@ag.tn.gov>; Ezra Rosenberg <erosenberg@lawyerscommittee.org>; Mitchell D. Brown <mitchellbrown@scsj.org>; Jeff Loperfido <jeffloperfido@scsj.org>; Mastoris, George <GMastoris@winston.com>; Tuma, Michelle <MTuma@winston.com>; Alexander Davis <adavis@lawyerscommittee.org>; Phillip Cramer <pcramer@sperling-law.com>
Subject: RE: Redistricting Case Discovery Responses

Pooja,

We're doing our best to stay warm! It's been quite a chilly few days.

I apologize for the faulty links. These should work for Interrogatory #5 ([House Redistricting Committee – TN General Assembly](#); [House Redistricting Committee – TN General Assembly \(archive.org\)](#)) and Interrogatory #6 ([senredistrictingcriteria.pdf \(tn.gov\)](#); [Senate Redistricting - TN General Assembly \(archive.org\)](#)). Let me know if you run into any other link-related issues.

The initial document search for the Secretary of State focused on gathering documents relevant to this litigation and produced in *Akilah Moore, et al. v. Governor Bill Lee*, No. 22-0287-IV (Tenn.Ch.). Many, if not all, of the 3,000+ pages were gathered from the General Assembly in hard copy. Given the unique nature of the documents, we had to conduct a preliminary review to determine whether a privilege applied that would require a meet and confer. The preliminary review process and internal discussions required a significant amount of the team's bandwidth. Ultimately, we determined that no privilege applies to the majority of the documents. The relevant documents will be produced to you on a rolling basis starting on February 2nd. Though not in strict compliance with the joint stipulation, I hope the demonstrated effort alleviates any concern that we have just now begun a document search.

As a point of clarification, the Secretary of State's Office provides administrative support to the State Election Commission. The State Election Commission is comprised solely of the commissioners. The Secretary of State's Office has identified the relevant custodians and started gathering .pst files. We will certainly communicate the number of hits, and any unusually large universes, as soon as the terms are applied to the data sets. We are discussing the search process for individual commissioners with our clients.

Please let me know if you have further questions. I am happy to coordinate a call next week if you'd like to discuss.

Best,
Ryan

Ryan Nicole Henry | Assistant Attorney General
Education and Employment Division
Office of the Tennessee Attorney General
UBS Building, 18th Floor
315 Deaderick Street, Nashville, Tennessee 37243
P: (615)532-2935

<image003.png>

From: Pooja Chaudhuri <pchaudhuri@lawyerscommittee.org>

Sent: Friday, January 19, 2024 11:42 AM

To: Ryan N. Henry <Ryan.Henry@ag.tn.gov>
Cc: Adam Mortara <mortara@lawfairllc.com>; Whitney Hermendorfer <Whitney.Hermendorfer@ag.tn.gov>; Miranda H. Jones <Miranda.Jones@ag.tn.gov>; Philip Hammersley <Philip.Hammersley@ag.tn.gov>; Ezra Rosenberg <erosenberg@lawyerscommittee.org>; Mitchell D. Brown <mitchellbrown@scsj.org>; Jeff Loperfido <jeffloperfido@scsj.org>; Mastoris, George <GMastoris@winston.com>; Tuma, Michelle <MTuma@winston.com>; Alexander Davis <adavis@lawyerscommittee.org>; Phillip Cramer <pcramer@sperling-law.com>
Subject: Re: Redistricting Case Discovery Responses

Hi, Ryan – hope you're staying warm! Questions and clarifications below.

First, for Secretary Hargett's and Coordinator Goins's ROGs, the hyperlinks provided in the responses to ROGs 5 and 6, do not work. Can you please send us links that work?

Second, based on our agreement in the joint stipulation and later in the case management order, i.e, ---"Between the date of this stipulation and January 15, 2024, the parties agree to meet and confer regarding the scope of any asserted grounds of privilege or other bases for nondisclosure, custodians, search terms to be used in electronic discovery, running the search terms, and the number of hits produced by agreed-upon searches," --- we were under the impression that the State was going to reach out us prior to Jan. 16 to meet and confer regarding any search terms and hits. It appears that the State has only now begun its search. Do you have a sense of how long it would take for you to review the documents you reference regarding the other redistricting litigation and also additionally run search terms for all the Defendants and relevant custodians?

Third, with respect to the 3000+ pages, can you provide(1) the search terms that were used to identify the universe of 3,000+ pages, (2) the list of custodians who were searched, and (3) whether the searches included a search of emails, text messages, and other electronic forms

of communication like Slack or signal?

Fourth, as requested, I have provided search terms below. Can you list the custodians searched? Can you confirm that you will be searching the relevant custodians for the State Election Commission and its individual members? Can you confirm that you will search emails, text messages, and other electronic forms of communication like Slack or signal? Finally, for each keyword string identified below, can you provide the number of hits?

If you would like discuss by zoom, please let me know. Happy to set up a call next week! Thank you!

Keyword String	# of Hits	Custodians list
(Congress* OR House OR Senat* OR Legislat*) w/20 (districts OR map* OR boundar* OR plan* OR apportion* or reapportion*)		
Redistrict* OR gerrymander* OR reapportion* OR "Redistricting Plan"		
("tabulation district" OR VTD OR precinct) w/10 (split* OR divid* OR cut* OR district* OR map OR boundar* OR border* OR apportion* OR reapportion* OR county OR counties)		
(district* OR redistrict*) w/20 ("Constitution" OR "Voting Rights Act" OR VRA OR "Section 2" OR (discriminat* w/3 intent*) OR (discriminat* w/3 result*) OR (discriminat*		

w/3 purpose) OR RPV OR RBV OR "minority cohes*" OR "geograph* OR county* OR counties OR compact*")		
(Census OR “population deviation” OR “populat* deviat* OR "American Community Survey" OR ACS) AND (grow* OR increas* OR drop* OR declin* OR change* OR count OR counts OR enumerat* OR estimat* OR deviat* OR ideal OR race OR racial* OR ethnic* OR national* OR minority OR citizen OR immigrant* OR Black OR African OR Hispanic OR Latin* OR Spanish OR white*)		
"House Bill 1037" OR "HB 1037" OR HB1037 OR "H.B. 1037" OR H1037 OR (House w/2 plan) OR (House w/2 map)		
"House Bill 1034" OR "HB 1034" OR HB1034 OR "H.B. 1034" OR H1034 OR (House w/2 plan) OR (House w/2 map)		
"Senate Bill 780" OR "SB 780" OR SB780 OR "S.B. 780" OR S780 OR (Senate w/2 plan) OR (Senate w/2 map)		
"Senate Bill 781" OR "SB 781" OR SB781 OR "S.B. 781" OR S781 OR (Senate w/2 plan) OR (Senate w/2 map)		

“Congressional District 5” OR “CD 5” OR CD5 OR “District 5” OR “Jim Cooper” OR “Cooper	
(Nashville OR “Davidson County”) w/20 (redist* OR Congress* OR House OR Senate OR plan OR map)	
(Shelby OR “Shelby County”) w/20 (redist* OR Congress* OR House OR Senate OR plan OR map)	
Shapefile* OR shape-file* OR "shape file" OR blockfile OR block-file OR "block file"	
“Dave’s Redistricting” OR “Dave’s”	
(Hearing OR meet* OR witness* OR debat* OR deadline* OR testim* OR testif* OR notice OR process* OR outreach OR press OR comm* OR mark* OR amend* OR sign*) w/20 ((district* w/3 (new OR propos* OR plan*)) OR map OR boundar* OR apportion* OR reapportion*	
Redistr* w/20 (invit* OR request OR consider OR testif* OR testim*)	
(Bill* OR legis* OR propos*) w/20 (race OR racial* OR racis* OR slavery OR "critical race theory" OR CRT OR Black OR African OR Hispanic OR Latin* OR Spanish OR Mexican OR white* OR Anglo* OR ethnic* OR national* OR language OR minority OR	

citizen* OR immigrant* OR pattern* OR election* OR bail* OR undocumented OR (illegal* w/3 immigr*)		
Redistr* w/20 (Republican* OR "Party" OR NRRT OR RPT OR GOP)		
Maptitude OR Mapti*		

--

Pooja Chaudhuri (pronouns: she/her)

Counsel, Voting Rights Project

Lawyers' Committee for Civil Rights Under Law

1500 K Street, NW, Suite 900

Washington, D.C. 20005

Dir: 202-662-8319 | Cell: 415-726-1414

[https://link.edgepilot.com/s/f389f855/sDXYDTmb80u-9E-MCh4FVg?
u=http://www.lawyerscommittee.org/](https://link.edgepilot.com/s/f389f855/sDXYDTmb80u-9E-MCh4FVg?u=http://www.lawyerscommittee.org/)

From: Pooja Chaudhuri <pchaudhuri@lawyerscommittee.org>

Sent: Tuesday, January 16, 2024 6:10 PM

To: Ryan N. Henry <Ryan.Henry@ag.tn.gov>

Cc: Adam Mortara <mortara@lawfairllc.com>; Whitney Hermandorfer <Whitney.Hermandorfer@ag.tn.gov>; Miranda H. Jones <Miranda.Jones@ag.tn.gov>; Philip Hammersley <Philip.Hammersley@ag.tn.gov>; Ezra Rosenberg <erosenberg@lawyerscommittee.org>; mitchellbrown@scsj.org <mitchellbrown@scsj.org>; Jeff Loperfido <jeffloperfido@scsj.org>; Mastoris, George

<GMastoris@winston.com>; Tuma, Michelle <MTuma@winston.com>; Alexander Davis <adavis@lawyerscommittee.org>; Phillip Cramer <pcramer@sperling-law.com>

Subject: Re: Redistricting Case Discovery Responses

Thanks, Ryan! Confirming receipt. Will send a longer response once we've had a chance to review.

Happy New Year!

Pooja

--

Pooja Chaudhuri (pronouns: she/her)

Counsel, Voting Rights Project

Lawyers' Committee for Civil Rights Under Law

1500 K Street, NW, Suite 900

Washington, D.C. 20005

Dir: 202-662-8319 | Cell: 415-726-1414

[https://link.edgepilot.com/s/f389f855/sDXYDTmb80u-9E-MCh4FVg?
u=http://www.lawyerscommittee.org/](https://link.edgepilot.com/s/f389f855/sDXYDTmb80u-9E-MCh4FVg?u=http://www.lawyerscommittee.org/)

From: Ryan N. Henry <Ryan.Henry@ag.tn.gov>

Sent: Tuesday, January 16, 2024 5:51 PM

To: Pooja Chaudhuri <pchaudhuri@lawyerscommittee.org>

Cc: Adam Mortara <mortara@lawfairllc.com>; Whitney Hermandorfer <Whitney.Hermandorfer@ag.tn.gov>; Miranda H. Jones <Miranda.Jones@ag.tn.gov>; Philip Hammersley <Philip.Hammersley@ag.tn.gov>; Ezra Rosenberg <erosenberg@lawyerscommittee.org>; mitchellbrown@scsj.org <mitchellbrown@scsj.org>; Jeff Loperfido <jeffloperfido@scsj.org>; Mastoris, George <GMastoris@winston.com>; Tuma, Michelle <MTuma@winston.com>; Alexander Davis <adavis@lawyerscommittee.org>; Phillip Cramer <pcramer@sperling-law.com>

Subject: Redistricting Case Discovery Responses

[EXTERNAL EMAIL] This email originated outside the organization. Do not click any links or open

any attachments unless you can verify the legitimacy.

Pooja,

Attached please find discovery responses for Secretary Hargett, Coordinator Goins, the State Election Commission, and Commissioners Barrett, Blackburn, Eldridge, McDonald, Meadows, and Younce. We met with Commissioner Smith regarding the requests and are waiting for him to return his responses.

The weather in Tennessee has much of the State homebound, so a few of the responses are without an executed verification page. We will forward verifications as soon as they are received. We appreciate your understanding on this front!

Documents produced in other litigation regarding redistricting may be responsive to requests for production directed to Secretary Hargett and Coordinator Goins. We have been actively reviewing those documents, which amount to 3,000+ pages, for responsiveness and protections. Additionally, a search of Secretary Hargett's, Coordinator Goins', and custodians' inboxes may reveal discoverable documents. Would you mind forwarding a list of search terms you would like to be applied to electronic documents?

Thanks,
Ryan

Ryan Nicole Henry | Assistant Attorney General
Education and Employment Division
Office of the Tennessee Attorney General
UBS Building, 18th Floor
315 Deaderick Street, Nashville, Tennessee 37243
P: (615)532-2935

<image003.png>

Links contained in this email have been replaced. If you click on a link in the email above, the link will be analyzed for known threats. If a known threat is found, you will not be able to proceed to the destination. If suspicious content is detected, you will see a warning.

<Himes Subpoena Package.pdf>