

EXHIBIT

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From: [Alyssa Bixby-Lawson](#)
To: [Lott, Jasmin \(CRT\)](#)
Cc: [Jack DiSorbo](#); [Freeman, Daniel \(CRT\)](#); [Anderson, Jacki \(CRT\)](#); [Berlin, Holly \(CRT\)](#); [Rupp, Michelle \(CRT\)](#)
Subject: [EXTERNAL] TLC Decl. re: RedAppl Public Accounts
Date: Wednesday, April 6, 2022 1:39:19 PM
Attachments: [Notification of RedAppl Data Subpoena.pdf](#)

Jasmin,

Defendants' counsel has reached out to Texas Legislative Council (TLC) about providing an affidavit related to public accounts in the TLC's RedAppl application that are non-legislator accounts. These accounts are available to the public and other state entities involved in the redistricting process and are generally requested by a sponsoring legislator. We have no objections to providing this factual information in case it should be helpful to the court.

I believe Lea informed you that TLC identified 15 such accounts. Requests to open the accounts were sponsored by the Texas legislators, identified in the table below, with the exception of an account for the Office of Attorney General (OAG).

On March 25, 2022, TLC notified the account holders of the public accounts via the email addresses associated with each account that the information they created or maintained in their RedAppl accounts is relevant to DOJ's subpoena and would be produced. Notice was provided in order to give any account holder the opportunity to assert any applicable privilege claim over the account information with the court. I've attached a copy of the email for your reference.

The below table identifies who the email went to and the sponsoring office for each account:

NameAccount	Email Address	Sponsoring Office
Allen Gardner_xgaa Count	allen@allengardnerlaw.com	Rep. Schaefer
Ed Martin_xmae Count	edmdem@gmail.com	Rep. Coleman
Eddie Bland_xbla Count	ebland@snyderisd.net	Rep. Burrows
Gary Bledsoe_xble Count	gbledsoe@thebledsoelawfirm.com	Sen. West
George Korbel_xkor Count	korbellow@hotmail.com	Sen. Gutierrez
Karen Loper_xlop Count	kkloper@aol.com	Rep. Vo
MALDEF MALDEF_xmal Count	nperales@MALDEF.org ; sochoa@MALDEF.org ; fmendez@MALDEF.org ;	Rep. Bernal
Martin Golando_xgol Count	martin.golando@gmail.com	Counsel to Cong. Escobar
Mike Baseline_xbam Count	mikeb@baseline.com	Rep. Huberty
Pam Durham_xdur Count	voteblue@pamdurham.com	Rep. Meza
Ramiro Canales_xcan Count	rcanales@redistrictinglaw.com	Rep. Raymond
Robert Jara_xjar Count	jara@campaignstrategies.com	Rep. Ana Hernandez
Russ Tidwell_xtid Count	russ@russtidwell.com	Sen. Whitmire

Yannis Banks_xbay Count	Yannis_banks@yahoo.com	Rep. Alma Allen
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There is also an account for the Office of the Attorney General, which did not have a sponsor or email. We informed defendants' counsel about the OAG account separately.

This is the information we are intending to provide in the affidavit. We will send you a copy.

Best,
Alyssa

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PRIVILEGED AND CONFIDENTIAL: This communication may be confidential and/or privileged pursuant to Government Code sections 552.101, 552.103, 552.107 and 552.111, and should not be disclosed without the express authorization of the Attorney General.

Alyssa Bixby-Lawson

From: Jon Heining <Jon.Heining@tlc.texas.gov>
Sent: Friday, March 25, 2022 11:48 AM
To: Jon Heining
Subject: Notification of RedAppl Data Subpoena
Attachments: Texas Legislative Council Subpoena_2022_02_28.pdf

Greetings:

As you know, you created, received, or accessed redistricting maps or data using the Texas Legislative Council's RedAppl application. The information you created or maintained in RedAppl is responsive to information requested in the attached subpoena, which was recently received by the council. Please be advised that the council must produce this information to the United States Department of Justice (USDOJ), and the information will subsequently be distributed to the other parties in the ongoing League of United Latin American Citizens v. Greg Abbott litigation. (Civil Action No. 3:21-cv-259-DCG-JES-JVB.) We are providing this notice to give you the opportunity to assert any applicable privilege claims with the court. The council will begin producing information to USDOJ beginning on March 30, 2022.

Sincerely,

Jon

[Jon Heining](#)

General Counsel | [Texas Legislative Council](#)
512.463.1151 | 512.936.1941 (d)