

# EXHIBIT

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**Freeman, Daniel (CRT)**

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**From:** Freeman, Daniel (CRT)  
**Sent:** Thursday, March 17, 2022 5:46 PM  
**To:** Jeff White  
**Cc:** mimi@texascivilrightsproject.org; pstegemoeller@aaldef.org; sosaki@aclu.org; skumar@aclutx.org; slakin@aclu.org; slorenzo-giguere@aaldef.org; tbuser-clancy@aclutx.org; umittal@jenner.com; asavitzky@aclu.org; aharris@aclutx.org; acepedaderieux@aclu.org; asegura@aclutx.org; jvattamala@aaldef.org; jamunson@jenner.com; ldavis@drtx.org; lostrom@drtx.org; Hani Mirza; Leif Olson; Aaron Barnes; Joshua Clarke; Elizabeth Saunders; gyeomans@naacpldf.org; kdulaney@reedsmith.com; jholmes@naacpldf.org; ksadasivan@naacpldf.org; kbroughton@reedsmith.com; lspencer@reedsmith.com; abadat@naacpldf.org; scummings@reedsmith.com; wakschlag@thearc.org; sean@lyonsandlyons.com; bclements@freespeechforpeople.org; laura.rosenbaum@stoel.com; wendy.olson@stoel.com; chostetler@freespeechforpeople.org; elijah.watkins@stoel.com; jbonifaz@freespeechforpeople.org; marc.rasich@stoel.com; rfein@freespeechforpeople.org; Clem@lyonsandlyons.com; nperales@maldef.org; christopher.bell@friedfrank.com; jason.kanterman@friedfrank.com; Jlongoria@maldef.org; kevin.zhen@friedfrank.com; michael.keats@friedfrank.com; rebecca.martin@friedfrank.com; liz.ryan@weil.com; paul.genender@weil.com; morales-doyles@brennan.law.nyu.edu; alexander.cohen@weil.com; andrew.garber@nyu.edu; jasleen.singh@nyu.edu; matt.berde@weil.com; patrick.berry@nyu.edu; Christian.Menefee@cao.hctx.net; Fombonne, Jonathan (CAO); sameer.birring@cao.hctx.net; domingo@dgley.com; gwhite@elias.law; johnhardin@perkinscoie.com; jhawley@elias.law; jposimato@elias.law; kyukevich@elias.law; melias@elias.law; mmixon@elias.law; unkwonta@elias.law; aleo@cooley.com; mejiab@cooley.com; christine@statesuniteddemocracy.org; ghbell@cooley.com; khartnett@cooley.com; kspector@cooley.com; oarmon@cooley.com; ranjana@statesuniteddemocracy.org; zack@statesuniteddemocracy.org; Cubriel, Lisa; josephine.ramirez@da.co.hidalgo.tx.us; leigh.tognetti@da.co.hidalgo.tx.us; Barbara.Nicholas@dallascounty.org; ben.stool@dallascounty.org; earl.nesbitt@dallascounty.org; tony.nelson@traviscountytexas.gov; leslie.dippel@traviscountytexas.gov; patrick.pope@traviscountytexas.gov; sherine.thomas@traviscountytexas.gov; Stewart, Michael (CRT); Yun, Jennifer (CRT); Paikowsky, Dana (CRT); Dellheim, Richard (CRT); Zachary Dolling; Sarah Chen; Patrick Sweeten; Eric Hudson; Will Thompson; Kathleen Hunker  
**Subject:** Re: [EXTERNAL] RE: LUPE v. Texas (SB 1): Deposition Notices

Jeff,

The State of Texas is a party to this lawsuit, and the Texas Department of Public Safety is a component of the State of Texas involved in the implementation of challenged provisions of Senate Bill 1. Moreover, the State has provided extracts of databases maintained by the Texas Department of Public Safety as party discovery in this litigation. Therefore, the United States maintains that the Texas Department of Public Safety is subject to deposition by notice in this case.

To the extent that the Texas Department of Public Safety nonetheless refuses to appear for a noticed deposition absent a subpoena, the United States will serve a subpoena on the Department of Public Safety pursuant to Rule 45(c)(1)(B)(i), which authorizes subpoenas to secure party participation in depositions.

Please let me know if and when DPS consents to service of such a subpoena through your office, via email.

Thanks,

Dan Freeman

Daniel J. Freeman  
Trial Attorney  
Voting Section, Civil Rights Division  
U.S. Department of Justice  
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daniel.freeman@usdoj.gov

On Mar 17, 2022, at 5:14 PM, Jeff White <Jeff.White@oag.texas.gov> wrote:

Dan,

DPS is not a party to this lawsuit. Any request for deposition of DPS should be served by means of a subpoena directed to DPS. We will reach out to DPS regarding whether we are permitted to accept service of the subpoena on their behalf, but we anticipate that this will be acceptable.

Regards,  
Jeff White  
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Office of the Attorney General  
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**From:** Freeman, Daniel (CRT) <Daniel.Freeman@usdoj.gov>

**Sent:** Tuesday, March 15, 2022 7:27 PM

**To:** Patrick Sweeten <Patrick.Sweeten@oag.texas.gov>; Eric Hudson <Eric.Hudson@oag.texas.gov>; Will Thompson <Will.Thompson@oag.texas.gov>; Jeff White <Jeff.White@oag.texas.gov>; Kathleen Hunker <Kathleen.Hunker@oag.texas.gov>

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<zachary@texascivilrightsproject.org>; Sarah Chen <schen@texascivilrightsproject.org>

**Subject:** LUPE v. Texas (SB 1): Deposition Notices

Counsel:

Attached please find Rule 30(b)(6) deposition notices for the Office of the Texas Secretary of State and the Texas Department of Public Safety.

Regards,

Dan Freeman

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