

## LULAC V. ABBOTT, 3:21-cv-00259-DCG-JES-JVB

## LULAC PLAINTIFFS' AMENDED LOG OF PRIVILEGED MATERIALS

Bates Number	Custodian	Date Document Prepared or Created	Document Type	Author or Sender	Recipients	Privilege or Protection Asserted	Description
LULAC0051	MABA-TX	1/4/2022	PDF	Russell Ramirez		Work Product Doctrine	Confidential email to internal MABA-TX team regarding developments in redistricting lawsuit.
LULAC0052	MABA-TX	5/7/2021	PDF	Nina Perales (Attorney)	Texas Latino Redistricting Task Force*	Attorney-Client Privilege	Confidential email to Texas Latino Redistricting Task Force regarding legislative developments and upcoming redistricting communications, including attorney analysis, mental impressions, strategy and/or legal advice
LULAC0053 - LULAC0054	MABA-TX	4/16/2021	PDF	Russell Ramirez		Work Product Doctrine	Notes from local MABA-Texas chapter meeting including litigation developments and strategy.
LULAC0055	MABA-TX	5/11/2021	PDF	Nina Perales (Attorney)	Texas Latino Redistricting Task Force	Attorney-Client Privilege	Confidential email to Texas Latino Redistricting Task Force regarding redistricting guide and forthcoming meeting, including attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0056 - LULAC0059	MABA-TX	7/15/2021	PDF	Nina Perales (Attorney)	Texas Latino Redistricting Task Force	Attorney-Client Privilege	Confidential email to Texas Latino Redistricting Task Force regarding legislative developments and upcoming redistricting special session, including attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0060 - LULAC0061	MABA-TX	7/7/2021	PDF	Lulu Flores	Russell Ramirez	Work Product Doctrine; Attorney-Client Privilege	Confidential email to MABA-TX leadership regarding notes from redistricting meeting, including attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0062 - LULAC0063	MABA-TX	7/1/2021	PDF	Fátima Menendez (Attorney)	Texas Latino Redistricting Task Force, Nina Perales (Attorney), Michael Mireles	Attorney-Client Privilege	Confidential email to Texas Latino Redistricting Task Force regarding House Redistricting Committee hearing, including attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0064 - LULAC0065	MABA-TX	8/12/2021	PDF	Nina Perales (Attorney)	Texas Latino Redistricting Task Force, Fátima Menendez (Attorney), Michael Mireles	Attorney-Client Privilege	Confidential email to Texas Latino Redistricting Task Force regarding Census developments, including attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0066 - LULAC0070	MABA-TX	8/27/2021	PDF	Russell Ramirez		Attorney-Client Privilege; Work Product Doctrine	Notes from Texas Latino Redistricting Task Force meeting regarding Census data release and anticipated litigation, which included attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0071	MABA-TX	8/25/2021	PDF	Nina Perales (Attorney)	Texas Latino Redistricting Task Force, Fátima Menendez (Attorney), Michael Mireles	Attorney-Client Privilege	Confidential email to Texas Latino Redistricting Task Force regarding redistricting hearings, including attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0072	MABA-TX	8/28/2021	PDF	Russell Ramirez	Nina Perales (Attorney)	Attorney-Client Privilege	Confidential email to counsel regarding redistricting lawsuit.
LULAC0073	MABA-TX	9/6/2021	PDF	Benny Agosto	Russell Ramirez	Work Product Doctrine; Attorney-Client Privilege	Confidential email to MABA-TX leadership regarding notes from redistricting meeting. Includes attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0074	MABA-TX	9/7/2021	PDF	Belinda Arambula	Russell Ramirez	Work Product Doctrine; Attorney-Client Privilege	Confidential email to MABA-TX leadership regarding notes from redistricting meeting. Includes attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0075 - LULAC0076	MABA-TX	9/6/2021	PDF	Russell Ramirez	Belinda Arambula	Work Product Doctrine; Attorney-Client Privilege	Confidential email regarding notes from redistricting meeting.
LULAC0077 - LULAC0078	MABA-TX	8/25/2021	PDF	Nina Perales (Attorney)	Texas Latino Redistricting Task Force, Fátima Menendez (Attorney), Michael Mireles	Attorney-Client Privilege	Confidential email to Texas Latino Redistricting Task Force regarding upcoming Texas Latino Redistricting Task Force meeting and Census developments, including attorney analysis, mental impressions, strategy and/or legal advice.

LULAC0079	MABA-TX	9/17/2021	PDF	Nina Perales (Attorney)	Texas Latino Redistricting Task Force, Lydia Camarillo	Attorney-Client Privilege	Confidential email to Texas Latino Redistricting Task Force regarding upcoming Texas Latino Redistricting Task Force meeting, legislative redistricting special session, and anticipated litigation, including attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0080	MABA-TX	9/29/2021	PDF	Nina Perales (Attorney)	Texas Latino Redistricting Task Force, Lydia Camarillo, Smantha Serna, Fátima Menendez (Attorney), Michael Mireles	Attorney-Client Privilege	Confidential email to Texas Latino Redistricting Task Force regarding upcoming Texas Latino Redistricting Task Force meeting, legislative redistricting special session, and anticipated litigation, including attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0081 - LULAC0085	MABA-TX	9/20/21	PDF	Russell Ramirez		Work Product Doctrine; Attorney-Client Privilege	Notes from Texas Latino Redistricting Task Force meeting regarding legislative redistricting special session and anticipated litigation, which included attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0086 - LULAC0087	MABA-TX	8/28/2021	PDF	Nina Perales (Attorney)	Texas Latino Redistricting Task Force, Fátima Menendez (Attorney), Michael Mireles	Attorney-Client Privilege	Confidential email regarding Texas Latino Redistricting Task Force's proposed redistricting plans, including attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0088	MABA-TX	8/28/2021	PDF	Nina Perales (Attorney)	Texas Latino Redistricting Task Force, Fátima Menendez (Attorney), Michael Mireles	Attorney-Client Privilege	Confidential email regarding Census data, including attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0089	MABA-TX	4/5/2021	PDF	Nina Perales (Attorney)	Texas Latino Redistricting Task Force; Lydia Camarillo	Attorney-Client Privilege	Confidential email to Texas Latino Redistricting Task Force regarding upcoming Texas Latino Redistricting Task Force meeting and potential litigation, including attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0090	MABA-TX	3/30/2021	PDF	Fátima Menendez (Attorney)	Russell Ramirez; Lydia Camarillo; Jana Ortega; Gloria Leal; Lulu Flores; Fátima Menendez (Attorney)	Work Product Doctrine; Attorney-Client Privilege	Confidential email to MABA-TX leadership regarding redistricting proposed plan, including attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0091	MABA-TX	3/12/2021	PDF	Russell Ramirez		Work Product Doctrine	Internal notes regarding redistricting plan.
LULAC0092	MABA-TX	3/11/2021	PDF	Lydia Camarillo	Russell Ramirez; Steven Aleman; Renee De La Cruz; M. Escobar Angelica Hernandez; Gloria Leal; R. Mejia; Jana Ortega; Danny Razo; Gavin Villareal; Belinda Arambula	Work Product Doctrine	Email regarding redistricting legislative hearings.
LULAC0093	MABA-TX		PDF	Russell Ramirez		Work Product Doctrine; Attorney-Client Privilege	Notes regarding Texas Latino Redistricting Task Force meeting.
LULAC0094 - LULAC0096	MABA-TX		PDF	Russell Ramirez		Work Product Doctrine; Attorney-Client Privilege	Notes regarding Texas Latino Redistricting Task Force meeting.
LULAC0097	MABA-TX	2/15/2021	PDF	Russell Ramirez	Belinda Arambula; Jana Ortega; Lulu Flores; Gloria Leal	Work Product Doctrine	Notes regarding Texas Latino Redistricting Task Force meeting, which included attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0098	MABA-TX	2/15/2021	PDF	Russell Ramirez	Belinda Arambula; Jana Ortega; Lulu Flores; Gloria Leal	Work Product Doctrine	Notes regarding Texas Latino Redistricting Task Force meeting, which included attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0099	MABA-TX	1/28/2021	PDF	Lydia Camarillo	Texas Latino Redistricting Task Force; Patricia Gonaes; Fátima Menendez (Attorney); Valerie Morales; Russell Ramirez	Attorney-Client Privilege	Confidential email to Texas Latino Redistricting Task Force regarding upcoming Texas Latino Redistricting Task Force meeting and participating in redistricting process, including attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0100 - LULAC0101	MABA-TX	2/5/2021	PDF	Fátima Menendez (Attorney)	Texas Latino Redistricting Task Force; Nina Perales (Attorney); Patricia Gonzales	Attorney-Client Privilege	Email to Texas Latino Redistricting Task Force regarding legislative committee assignments, including attorney analysis, mental impressions, strategy and/or legal advice.

LULAC0102 - LULAC0104	MABA-TX	1/29/2021	PDF	Russell Ramirez		Work Product Doctrine; Attorney-Client Privilege	Notes regarding Texas Latino Redistricting Task Force meeting, including attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0105 - LULAC0107	MABA-TX	1/24/2021	PDF	Russell Ramirez	Lulu Flores; Martin Garza;	Work Product Doctrine; Attorney-Client Privilege	Email to MABA-TX leadership regarding MABA-TX participation in Texas Latino Redistricting Task Force, upcoming Texas Latino Redistricting Task Force meeting, and redistricting regional hearings, including attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0108 - LULAC0109	MABA-TX	1/23/2021	PDF	Florinda Chavez	Texas Latino Redistricting Task Force; Fátima Menendez (Attorney); Nina Perales (Attorney)	Attorney-Client Privilege	Email to Texas Latino Redistricting Task Force regarding Texas HOPE membership in Task Force. Includes attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0110 - LULAC0111	MABA-TX	1/19/2021	PDF	Russell Ramirez	Lulu Flores	Work Product Doctrine; Attorney-Client Privilege	Email to MABA-TX leadership regarding Texas Latino Redistricting Task Force information on redistricting regional hearings. Includes attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0112 - LULAC0113	MABA-TX	1/15/2021	PDF	Amanda Moore	Russell Ramirez	Attorney-Client Privilege	Email regarding upcoming Texas Latino Redistricting Task Force meeting. Includes attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0114	MABA-TX	4/8/2021	PDF	Nina Perales (Attorney)	Texas Latino Redistricting Task Force	Attorney-Client Privilege	Email to Texas Latino Redistricting Task Force regarding legislative developments and upcoming meeting agenda, including attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0115	MABA-TX	4/10/2021	PDF	Russell Ramirez	Steven Aleman; Renee De La Cruz; Belinda Arambula;	Work Product Doctrine; Attorney-Client Privilege	Email regarding developments from Texas Latino Redistricting Task Force meeting. Includes attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0116 - LULAC0118	MABA-TX	4/9/2021	PDF	Russell Ramirez		Work Product Doctrine; Attorney-Client Privilege	Notes from Texas Latino Redistricting Task Force meeting. Includes attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0119	MABA-TX	7/8/2021	PDF	Russell Ramirez		Work Product Doctrine; Attorney-Client Privilege	Notes regarding legislation and redistricting litigation.
LULAC0120	MABA-TX	7/8/2021	PDF	Russell Ramirez		Work Product Doctrine; Attorney-Client Privilege	Notes regarding legislation and redistricting litigation.
LULAC0121	Proyecto Azteca	1/12/2021	PDF	Nina Perales (Attorney)	Texas Latino Redistricting Task Force, Fátima Menendez (Attorney)	Attorney-Client Privilege	Confidential email to Texas Latino Redistricting Task Force regarding new proposed rules in Texas Senate regarding redistricting. Includes attorney analysis, mental impressions, strategy and/or legal advice..
LULAC0122	Proyecto Azteca	1/19/2021	PDF	Fátima Menendez (Attorney)	Texas Latino Redistricting Task Force, Nina Perales (Attorney)	Attorney-Client Privilege	Confidential email to Texas Latino Redistricting Task Force regarding Texas Senate regional hearings on redistricting. Includes attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0123 - LULAC0127	Proyecto Azteca	1/23/2021	PDF	Fátima Menendez (Attorney)	Texas Latino Redistricting Task Force, Nina Perales (Attorney)	Attorney-Client Privilege	Confidential email to Texas Latino Redistricting Task Force regarding regional redistricting hearings, including attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0128	Proyecto Azteca	1/29/2021	PDF	Lydia Camarillo	Texas Latino Redistricting Task Force, Fátima Menendez (Attorney), Nina Perales (Attorney), Patricia Gonzales	Attorney-Client Privilege	Confidential email to Texas Latino Redistricting Task Force regarding upcoming Texas Latino Redistricting Task Force meeting, including attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0129 - LULAC0130	Proyecto Azteca	2/5/2021	PDF	Fátima Menendez (Attorney)	Texas Latino Redistricting Task Force; Nina Perales (Attorney); Patricia Gonzales	Attorney-Client Privilege	Email to Texas Latino Redistricting Task Force regarding legislative committee assignments, including attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0131	Proyecto Azteca	3/4/2021	PDF	Lydia Camarillo	Texas Latino Redistricting Task Force	Attorney-Client Privilege	Confidential email to Texas Latino Redistricting Task Force regarding dates for redistricting committee testimony, including attorney analysis, mental impressions, strategy and/or legal advice.

LULAC0132	Proyecto Azteca	3/25/2021	PDF	Lydia Camarillo	Texas Latino Redistricting Task Force	Attorney-Client Privilege; Work Product Doctrine	Confidential email to Texas Latino Redistricting Task Force regarding bill-related testimony and analysis of legislation, including attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0133	Proyecto Azteca	3/25/2021	PDF	Lydia Camarillo	Texas Latino Redistricting Task Force	Attorney-Client Privilege; Work Product Doctrine	Confidential email to Texas Latino Redistricting Task Force regarding bill-related testimony and analysis of legislation, including attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0134	Proyecto Azteca	4/5/2021	PDF	Nina Perales (Attorney)	Texas Latino Redistricting Task Force	Attorney-Client Privilege; Work Product Doctrine	Confidential email to Texas Latino Redistricting Task Force regarding upcoming meeting of the group and introduced redistricting legislation. Includes attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0135	Proyecto Azteca	4/6/2021	PDF	Nina Perales (Attorney)	Texas Latino Redistricting Task Force	Attorney-Client Privilege; Work Product Doctrine	Confidential email to Texas Latino Redistricting Task Force regarding upcoming meeting of the group and introduced redistricting legislation. Includes attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0136	Proyecto Azteca	4/8/2021	PDF	Nina Perales (Attorney)	Texas Latino Redistricting Task Force	Attorney-Client Privilege	Confidential email to Texas Latino Redistricting Task Force regarding forthcoming meeting. Includes attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0137 - LULAC0138	Proyecto Azteca	4/26/2021	PDF	Nina Perales (Attorney)	Texas Latino Redistricting Task Force	Attorney-Client Privilege	Confidential email to Texas Latino Redistricting Task Force regarding release of U.S. Census data. Includes attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0139 - LULAC0140	Proyecto Azteca	4/26/2021	PDF	Nina Perales (Attorney)	Texas Latino Redistricting Task Force	Attorney-Client Privilege	Confidential email to Texas Latino Redistricting Task Force regarding release of U.S. Census data. Includes attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0141	Proyecto Azteca	5/7/2021	PDF	Nina Perales (Attorney)	Texas Latino Redistricting Task Force	Attorney-Client Privilege	Confidential email to Texas Latino Redistricting Task Force regarding redistricting and other voting-related legislation. Includes attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0142 - LULAC0143	Proyecto Azteca	5/11/2021	PDF	Nina Perales (Attorney)	Texas Latino Redistricting Task Force	Attorney-Client Privilege	Confidential email to Texas Latino Redistricting Task Force regarding redistricting guide and forthcoming meeting, including attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0144	Proyecto Azteca	6/15/2021	PDF	Lydia Camarillo	Texas Latino Redistricting Task Force	Attorney-Client Privilege; Work Product Doctrine	Confidential email to Texas Latino Redistricting Task Force regarding forthcoming meeting about analysis and impressions of Census data and election analysis. Includes attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0145 - LULAC0146	Proyecto Azteca	7/1/2021	PDF	Fátima Menendez (Attorney)	Texas Latino Redistricting Task Force, Michael Mireles	Attorney-Client Privilege	Confidential email to Texas Latino Redistricting Task Force regarding House Redistricting Committee hearing. Includes attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0147 - LULAC0149	Proyecto Azteca	7/8/2021	PDF	Fátima Menendez (Attorney)	Texas Latino Redistricting Task Force, Nina Perales (Attorney)	Attorney-Client Privilege	Confidential email to Texas Latino Redistricting Task Force regarding House Redistricting Committee hearings. Includes attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0150	Proyecto Azteca	7/13/2021	PDF	Nina Perales (Attorney)	Texas Latino Redistricting Task Force, Michael Mireles, Fátima Menendez (Attorney)	Attorney-Client Privilege	Confidential email to Texas Latino Redistricting Task Force regarding House Redistricting Committee hearings. Includes attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0151	Proyecto Azteca	8/5/2021	PDF	Nina Perales (Attorney)	Texas Latino Redistricting Task Force, Fátima Menendez (Attorney), Michael Mireles	Attorney-Client Privilege	Confidential email to Texas Latino Redistricting Task Force regarding Census, redistricting, and special session. Includes attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0152 - LULAC0153	Proyecto Azteca	8/12/2021	PDF	Nina Perales (Attorney)	Texas Latino Redistricting Task Force, Fátima Menendez (Attorney), Michael Mireles	Attorney-Client Privilege; Work Product Doctrine	Confidential email to Texas Latino Redistricting Task Force regarding Census and redistricting. Includes attorney analysis, mental impressions, strategy and/or legal advice.

LULAC0154	Proyecto Azteca	8/23/2021	PDF	Lydia Camarillo	Texas Latino Redistricting Task Force	Attorney-Client Privilege	Confidential email to Texas Latino Redistricting Task Force regarding forthcoming meeting. Includes attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0155	Proyecto Azteca	8/28/2021	PDF	Nina Perales (Attorney)	Texas Latino Redistricting Task Force	Attorney-Client Privilege	Confidential email to Texas Latino Redistricting Task Force regarding TLC maps and 2020 Census data. Includes attorney analysis, mental impressions, strategy and/or legal advice.
LULAC0156	LULAC	11/18/2021	DOC	Gloria Leal	Rodolfo Rosales and State LULAC Board	Attorney-Client Privilege; Work Product Doctrine	Confidential internal memo regarding redistricting lawsuit, including attorney analysis, mental impressions, strategy and/or legal advice.

\* Texas Latino Redistricting Task Force includes the following individuals: Lawrence Romo, Lourdes Flores, Ramona Casas, Tony Villareal, Cesar Espinosa, Gloria Gonzales Dholakia, Jackie Bastard, Patricia, Karina Alvarez, Juan Livas, Juanita Valdez-Cox, Daniel Diaz, Domingo Garcia, Gloria Leal, Jana Ortega, Angelica Razo, Dan Solis, Ann Cass, Amber Arriaga Salinas, Danielle Salgado, Veronica Garza, Paula Barrera, Adriana Cadena, Lydia Camarillo, Patricia Gonzales, Diana Lopez, Stan Paz, Juan Cabrera, Sam Guzman, Pauline Anton, Joey Cardenas, Florinda Chavez, Manuel Grajeda, Roxanne Garza, Juan Manuel Guzman, Camille Martin, Ana Gonzalez, Juan Benitez, Emily Timm, Ana Gonzalez, Brianna Carmen, Pedro Lira, Antonio Arellano, Martha Zapata, Irasema Cavazos, Petra Mata, Virdiana Tule Carrizales, Dayann Pazmino, Jordan Buckley, Jayme Mathias, Vincent Tovar, Hector Sanchez Barba, Elizabeth Bille, Genesis Sanchez, Levar Martin, Angelica Andrade, Norma Herrera, Julio Acosta, Carolina Canizales, Naiyolis Palomo, Lilliana Saldana, Christopher Carmona, Olivia Hernandez, Jesse Romero, Daniel Villanueva, Toni Cordova, Juan Flores, Michelle Tremillo, Jesse Azua, Tiffany Hogue, Adrian Reyna and Vanessa Rodriguez.