UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

LEAGUE OF UNITED LATIN AMERICAN CITIZENS, *et al.*,	§	
	§	
***Plaintiffs*,**	§	
	§	**EP-21-CV-00259-DCG-JES-JVB**
EDDIE BERNICE JOHNSON, *et al.*,	§	**[Lead Case]**
	§	
***Plaintiff-Intervenors*,**	§	**&**
v.	§	
	§	**All Consolidated Cases**
GREG ABBOTT, in his official capacity as Governor of the State of Texas**, *et al.*,**	§	
	§	
***Defendants*.**	§	

MEMORANDUM OPINION AND ORDER[1]

The United States and a legion of private plaintiffs have alleged that the redistricting plans enacted by Texas following the 2020 census violate the Voting Rights Act ("VRA") and the United States Constitution. In this consolidated redistricting case, numerous discovery disputes have arisen regarding the invocation of the legislative privilege by Texas legislators and associated individuals. Specifically, the United States and private plaintiffs have moved to compel the production of numerous documents and unseal portions of deposition testimony given by legislators and their aides and consultants. We ruled on several of these motions in a July 25, 2022 order, *see* ECF No. 467, but the Fifth Circuit vacated that order in light of recent caselaw articulating the scope of the legislative privilege. *See League of United Latin Am. Citizens v. Abbott*, No. 22-50662, 2023 WL 4697109 (5th Cir. July 18, 2023) (per curiam) (unpublished).

In May 2023, the Fifth Circuit decided *Jackson Municipal Airport Authority v. Harkins*, 67 F.4th 678 (5th Cir. 2023), and *La Union del Pueblo Entero v. Abbott,* 68 F.4th 228 (5th Cir. 2023) ("*Hughes*"). Both cases directly affect the discovery dispute between the parties here, and at the

[1] Judge David C. Guaderrama respectfully dissents from this Memorandum Opinion and Order and will issue a dissenting opinion in due course. The panel unanimously agrees to release the majority opinion by itself now, so that the case may proceed while Judge Guaderrama drafts his dissent.

parties' request, *see* ECF No. 702, this Court ordered supplemental briefing to better understand and apply these new binding cases, *see* ECF No. 703. After the parties had submitted almost all of their supplemental briefing, the Fifth Circuit withdrew and vacated its opinion in *Harkins*, substituting it with an unpublished, non-precedential opinion. *See* No. 21-60312, 2023 WL 5522213, at *1 (5th Cir. Aug. 25, 2023) (unpublished). Shortly thereafter, the Fifth Circuit withdrew the unpublished opinion and scheduled the case for en banc rehearing. *See* 78 F.4th 844 (Mem) (5th Cir. 2023). We therefore disregard *Harkins* and rule as follows regarding the legislative privilege and the pending motions to compel:

I. The Scope of the Legislative Privilege

We find that the legislative privilege's scope is properly and necessarily broad.

The *Hughes* plaintiffs pointed to *Jefferson Community Health Care Centers, Inc. v. Jefferson Parish Government* ("*JCHCC*") for the proposition that "the legislative privilege for state lawmakers is, at best, one which is qualified." 849 F.3d 615, 624 (5th Cir. 2017). But the court distinguished *JCHCC* by pointing out that those claims related to whether a court could even "*decid[e]* whether to issue injunctive relief[,]" not whether "state legislators can be compelled to produce documents concerning the legislative process and a legislator's subjective thoughts and motives." *Hughes*, 68 F.4th at 240 (citing *JCHCC*, 849 F.3d at 624) (emphasis in the original). We face the same issue here. Because the Fifth Circuit treats the invocation of legislative privilege to bar a claim (*JCHCC*) and its invocation to prevent certain discovery (*Hughes*) as distinct, we do so too. Therefore, *Hughes* governs our discussion of the legislative privilege's scope, not *Jefferson*. So, we begin by applying *Hughes* to define the legislative privilege and its extent. Then we address which defendants can assert it.

As the Fifth Circuit explained in *Hughes*, the state-legislator's legislative privilege is a common-law evidentiary privilege. 68 F.4th at 235. As a common-law privilege, it is not governed by the Speech or Debate Clause of the U.S. Constitution and is therefore narrower than the federal legislative privilege and must yield in certain situations, as discussed *infra*. *See United States v. Gillock*, 445 U.S. 360, 366–67, 372 n.10 (1980). It is not an immunity from suit or from attending a deposition. Instead, the privilege covers the material a legislator may refuse to turn over or disclose. *See Am. Trucking Ass'ns, Inc. v. Alviti*, 14 F.4th 76, 86 n.6 (1st Cir. 2021); *Hughes*, 68

F.4th at 237 ("the parallel between [legislative privilege and legislative immunity] may not run to the horizon"). Specifically, it protects the "many actions and documents" legislators take, review, or produce "within 'the legislative process itself' . . . ." *Hughes*, 68 F.4th at 235 (quoting *In re Hubbard*, 803 F.3d 1298, 1308 (11th Cir. 2015)); *see also Tenney v. Brandhove*, 341 U.S. 367, 372 (1951). And the scope of the legislative privilege "is necessarily broad." *Hughes*, 68 F.4th at 236.

Thus, this privilege extends well beyond the act of voting for or against a particular piece of legislation. It covers material prepared for a legislator's understanding of legislation, lobbying conversations encouraging a vote on pending legislation, and even materials the legislator possesses related to potential legislation—*i.e.*, "all aspects of the legislative process." *Id.* at 235–36 (quotation marks and citation omitted); *see also Almonte v. City of Long Beach*, 478 F.3d 100, 103 (2d Cir. 2007) ("[L]egislative immunity applies not only to . . . vote[s] . . ., but also to any discussions and agreements . . . prior to the vote, regardless of whether those discussions and agreements took place in secret."). *But see United States v. Helstoski*, 442 U.S. 477, 490 (1979) (describing "legislative acts" under the Speech or Debate clause exclusively as prior actions). The privilege also extends to material provided by or to third parties involved in the legislative process, *Hughes*, 68 F.4th at 237; *see In re N.D. Legis. Assembly*, 70 F.4th 460, 464 (8th Cir. 2023), because all of these actions occur "within 'the regular course of the legislative process,'" *Hughes*, 68 F.4th at 235 (quoting *Helstoski*, 442 U.S. at 489 (1979)).

Primarily, this protection enables state legislators to focus on legislating "rather than on motions practice in lawsuits." *Id.* at 237 (citing *Tenney*, 341 U.S. at 377). Therefore, the privilege "applies with full force against requests for information about the motives for legislative votes and legislative enactments." *Hubbard*, 803 F.3d at 1310. Such requests are exactly what we are dealing with here.

However, this privilege does not extend beyond the legislative process. To the extent the plaintiffs seek discovery over materials not part of the "proposal, formulation, and passage of legislation," that material is not protected by the privilege. *Hughes*, 68 F.4th at 236 (quoting *Hubbard*, 803 F.3d at 1308).

A. The Legislative Privilege Protects Derivative Factual Information

Like other common-law privileges, the legislative privilege does not protect purely factual information. And, as the plaintiffs' and United States' briefs suggest, we believe it appropriate to analogize to two of those common-law privileges. *See* ECF No. 708 at 6–7 (citing *Comm. for a Fair & Balanced Map v. Ill. State Bd. of Elecs.*, No. 11 C 5065, 2011 WL 4837508, at *7 n.9 (N.D. Ill. Oct. 12, 2011) (analogizing the legislative privilege to the deliberative-process privilege); *Upjohn Co. v. United States*, 449 U.S. 383, 389, 395 (1981) (attorney-client privilege); *In re Sealed Case*, 121 F.3d 729, 750 (D.C. Cir. 1997) (deliberative-process privilege)); ECF No. 709 at 9–13; ECF No. 722 at 5–6. *But see* ECF No. 721 at 14–16 (Defendants' Brief). As discussed *infra*, we believe analogizing to those other common-law privileges—the attorney-client privilege and the deliberative-process privilege—helps elucidate the extent of the legislative privilege. But that does not mean that all three privileges are coterminous. The legislative privilege extends further than either other privilege when it comes to bare facts.

The legislative privilege protects the possession, preparation, or review of factual information when disclosure would "inevitably reveal the [legislator's] deliberations."[2] *In re Sealed Case*, 121 F.3d at 737 (citing *NLRB v. Sears, Roebuck & Co.*, 421 U.S. 132, 150–54 (1974)). Disclosure *of* the underlying facts that the legislator relied on in voting on or in crafting a legislative proposal is unlikely to affect the legislator's willingness to consider those facts or reveal his or her deliberations. However, disclosing *that* the legislator relied on or considered some facts, and not others, would inevitably indicate the legislator's deliberations.[3] Thus, testimony or documentation that may indicate the legislator's relative focus on some facts is privileged. For example, testimony such as "I don't know" or "I don't recall" is privileged insofar as it indicates that the legislator did not find certain material particularly relevant to the decision-making process. *Cf.* ECF No. 708

[2] Whether something would "inevitably reveal the [legislator's] deliberations" can be considered akin to whether evidence is relevant. Similarly, so long as disclosure of the factual material by the legislator would add a brick to the plaintiffs' wall, it falls within the scope. *See* FED. R. EVID 401 advisory committee's note to 1972 Proposed Rules. That is not to say that the same factual material is not discoverable from others, though. *See infra*.

[3] We do not indicate that possession, preparation, or review *per se* brings the factual information within the scope of the privilege. It is the fact that any of those actions occurred in the legislative process that brings them within the scope. For example, a legislator may review a study in her office in preparation for teaching a class at a local college. She cannot claim legislative privilege over that study or her review of it because she did not do so for any legislative reason. But, had she reviewed that study as preparation for writing a bill, her possession and review of that study would fall within the scope of the privilege.

at 11. Similarly, material the legislator obtained, or declined to obtain, in the decision-making process is privileged too insofar as it is sought from the legislator.

As *Hughes* makes clear, the privilege protects information shared with a legislator by a third party, or which a legislator shares with a third party for the purposes of preparing or voting on legislation. 68 F.4th at 236. We believe that this also means any reports or analyses prepared for a legislator, or even in the process of briefing a legislator, are protected derivative factual information. This is because such meetings, and therefore the preparation for them, are "part and parcel of the modern legislative procedures through which legislators receive information possibly bearing on the legislation they are to consider." *Id.* (quoting *Bruce v. Riddle*, 631 F.2d 272, 280 (4th Cir. 1980)). Such documents and information are prepared *within* the legislative process. *See Gov't of V.I. v. Lee*, 775 F.2d 514, 521 (3d Cir. 1985) ("[F]act-finding, information gathering, and investigative activities are essential *prerequisites* to the drafting of bills and the enlightened debate over proposed legislation." (emphasis added)). Just because no one presented that document to a legislator does not mean that no one presented the information *contained* in the document to the legislator. Therefore, such documents—even those in the possession of the executive branch or outside consultants—may fall within the legislative privilege. *Cf.* ECF No. 709 at 6–7.

However, the plaintiffs are right that not all facts or documents are covered within the legislative privilege. ECF No. 709 at 9; ECF No. 722 at 8–9. For example, routine administrative and employment records are not protected because not all acts of a legislator are inherently legislative.[4] *Gravel v. United States*, 408 U.S. 606, 625 (1972); *United States v. Brewster*, 408 U.S. 501, 512–13 (1972); *Davis v. Passman*, 544 F.2d 865, 879–80 (5th Cir. 1977). Facts that would not inherently lead to the discovery of the legislator's mindset, opinion, or motive may be discoverable. *See Lee*, 775 F.2d at 525. However, the availability of the factual information elsewhere will typically indicate that such a discovery request is merely an attempt to reveal what the legislator considered—information which would be privileged.[5]

[4] To clarify the distinction between administrative and employment matters and legislative matters we offer an example: That the legislator hired an employee to work in her office falls beyond the scope of the privilege, even if that employee worked on matters relating to legislative acts. However, that she hired a consultant to work on a specific act or set of acts would be within the privilege's scope.

[5] We note that the Eleventh Circuit recently adopted a strict, intent-focused inquiry when deciding whether the legislative privilege applies. *See Pernell v. Fla. Bd. of Governors of State Univ.*, 84 F.4th 1339, 1343 (11th Cir. 2023)

B. Aides and Consultants to Legislators Can Assert the Legislative Privilege

The plaintiffs correctly note that the legislative privilege is personal, *i.e.*, a privilege that only legislators or their aides can assert. ECF No. 725 at 6–7; *see Gravel*, 408 U.S. at 616–18.[6] But the claims that executive officers like the Lieutenant Governor or employees of the Office of the Attorney General (OAG) did not act like legislators' aides falls flat. *See* ECF No. 708 at 10; ECF No. 709 at 6, 15. Like an expert report is privileged work-product even if the report's underlying facts are not privileged, so too can the legislative privilege cover products of the executive branch when prepared in the legislative process. So, whether the OAG, Lieutenant Governor, or any other person has the documents or information is not the dispositive question. Rather, we must ask whether the OAG or the Lieutenant Governor obtained or prepared this information to present it to legislators in the legislative process. If so, then the executive branch official acted as an aide or consultant to the legislator and properly asserted the privilege. *See Hughes*, 68 F.4th at 236–37; *Am. Trucking*, 14 F.4th at 88; *N.D. Legis. Assembly*, 70 F.4th at 463. However, the legislator(s) on whose behalf the executive officers assert the privilege need not consult with the officers before waiving the privilege.[7] Further, waiver may occur automatically depending on statutes related to publication or availability of government-produced reports.

The claim that the Lieutenant Governor can assert legislative privilege himself as an occasional member of the legislature carries little weight with this court as he and his office

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(citing *Hubbard*, 803 F.3d at 1311). While we do not adopt a rule which inquires into the intent of the subpoenaing party, our ruling effectively reaches the same result. The documents sought by plaintiffs which are discoverable from third parties can be sought from those third parties without subjecting legislators to the vicissitudes of motions practice. Any documents related to a legislative act sought by plaintiffs directly from the legislators will inherently get to the legislator's motive, meaning that the documents fall within the scope of the legislative privilege. It is only documents related to those inherently non-legislative acts, *Gravel*, 408 U.S. at 625, which are outside the scope of the privilege.

[6] "[T]he legislative privilege that protects state lawmakers 'is similar in origin and rationale to that accorded Congressmen under the Speech or Debate Clause.'" *Hughes*, 68 F.4th at 237 (quoting *Sup. Ct. of Va. v. Consumers Union of U. S., Inc.*, 446 U.S. 719, 732 (1980)). And "the Speech or Debate Clause prohibits inquiry into things done by . . . the Senator's agent or assistant which would have been legislative acts, and therefore privileged, if performed by the Senator personally." *Gravel*, 408 U.S. at 616 (quotation marks and citation omitted).

[7] *Gravel* expressly contemplates this scenario—where an aide invokes the privilege without prior authorization from a legislator—when it notes that "an aide's claim of privilege can be repudiated and thus waived by the [legislator]." 408 U.S. at 622 n.13.

produced these documents in his executive branch role, not as a legislative act. *See Am. Trucking*, 14 F.4th at 87–88. Although another situation may arise where the Lieutenant Governor legitimately claims that documents were prepared in advance of him exercising his legislative role as a member of the Committee of the Whole, or as a tie-breaking vote, that is not the case here and we decline to extend our ruling to that issue.

Finally, the plaintiffs are correct that the burden rests on the party asserting the privilege to establish that the privilege applies. ECF No. 709 at 18; *see EEOC v. BDO USA, L.L.P.*, 876 F.3d 690, 695 (5th Cir. 2017). To the extent that the legislators claim materials or documents they have never seen are covered by the legislative privilege, they must provide adequate substantiation that someone communicated the content to them within the legislative process for the privilege to apply. However, like the court in *Hughes*, we are persuaded by the Eleventh Circuit's reasoning that the legislators meet this burden when they have sufficiently pointed out that "the only purpose of the subpoenas was to further [the] inquiry into the lawmakers' motivations . . . ." *Hubbard*, 803 F.3d at 1311; *see also Pernell*, 84 F.4th at 1343.

II. There are no *per se* time limitations on the documents that may be subject to the legislative privilege.

The United States urges us to apply legislative privilege only where it exists to documents that do not "predat[e] the proposal of redistricting plans—*i.e.*, . . . before August 12, 2021" or "postdat[e] the passage of the same—*i.e.*, . . . after October 25, 2021." ECF No. 722 at 8. We will address pre-proposal documents and then post-enactment documents in turn.

The relevant language in *Hughes* holds that "privilege covers legislators' actions in the proposal, formulation, and passage of legislation." 68 F.4th at 236 (internal quotation marks and citations omitted). The United States contends we should read this in the context of "potential legislation." ECF No. 722 at 9 n.7 (quoting *Hughes*, 68 F.4th at 236); *see also* ECF No. 727 at 4–5. The United States further claims that this ought to be read narrowly so as not to include "all matters that could theoretically be subject to legislation." ECF No. 722 at 9 n.7. Defendants retort that this is an attempt to "draw arbitrary time cutoffs." ECF No. 731 at 8.

Concerning pre-proposal documents, the defendants have the better argument. Although the United States' concern that legislative privilege should not extend to "all matters that could

theoretically be subject to legislation" is a worthy consideration, it fails to explain why a time-based restraint is essential to prevent this problem. ECF No. 722 at 9 n.7. More importantly, it is hard to read *Hughes*' insistence that the privilege extends to "actions in the proposal[and] formulation . . . of legislation" consistently with such a strict time-based limit on the privilege. 68 F.4th at 236. Necessarily, there are "actions in the proposal[and] formulation . . . of legislation" that predate the formal form of either. Legislative proposals do not materialize from thin air, and they do not address unidentified issues. Therefore, we reject any start date at which the legislative privilege applies. The legislative privilege attaches whenever someone makes an in-scope communication—regardless of any proposal.[8]

Documents that post-date enactment present a similar but closer question. The United States argues that all documents which post-date the passage of legislation cannot be concerning "*potential* legislation" and so are not entitled to legislative privilege. ECF No. 722 at 9 n.7. As the defendants note, tying the privilege only to "potential legislation" misconstrues *Hughes*. ECF No. 722 at 8–9. *Hughes* is quite clear that the legislative privilege extends to "actions that occurred within the sphere of legitimate legislative activity" and "all aspects of the legislative process." 68 F.4th at 235 (quotation marks and citations omitted). Moreover, it is "'not consonant with our scheme of government for a court to inquire into the motives of legislators' . . . in drafting, supporting, or opposing proposed *or enacted* legislation." *Id.* at 238 (quoting *Tenney*, 341 U.S. at 377) (emphasis added). Given this broad language, we find it imprudent to draw a line in the sand at enactment. That said, we have not found, nor can we think of, any document post-enactment that would fall within the legislative privilege.[9] In sum, as with pre-proposal documents, post-

[8] The plaintiffs point to *Helstoski*, 442 U.S. at 490, to indicate that promises to engage in legislative acts in the future are not privileged. ECF No. 728 at 11. And indeed, *Helstoski* is clear that "[p]romises by a [legislator] to perform an act in the future are not legislative acts." 442 U.S. at 489. But, whether something is a legislative act is a relevant consideration to whether something is in the scope of legislative privilege. That's where *Helstoski* is relevant, not as an artificial time-based limit on the timeframe to which privilege extends. This is consistent with our conclusion that legislative scope is co-extensive with the timeframe of legislative privilege.

[9] The State Defendants attempt to provide an example from the record here, but we are not convinced. *See, e.g.*, ECF No. 721 at 21 n.4. For example, the State Defendants point to post-enactment documents that were "created in furtherance of Sen[ator] Huffman's legislative duties." *Id.* But they do not explain how these were "in furtherance of Sen[ator] Huffman's legislative duties." On our read of the underlying record, these documents might be more appropriately covered under attorney-client privilege, if at all. *See* ECF No. 561 at 11–14.

enactment documents that are in the scope are also covered by the privilege, even if we think this is likely a null set.

III. The legislative privilege—where applicable—need not yield to either the United States or the private plaintiffs.

The legislative privilege "must yield" in "extraordinary instances." *Hughes*, 68 F.4th at 237 (cleaned up). That includes cases "where important federal interests are at stake, as in the enforcement of federal criminal statutes." *Id.* at 237–238 (quoting *Gillock*, 445 U.S. at 373).

"'[I]mportant federal interests' may be at stake in . . . 'extraordinary' civil cases." *Id.* at 238 (quoting *Gillock*, 445 U.S. at 373). But these "qualifications do not subsume the rule." *Id.* The mere fact that "constitutional rights are at stake" or that there is a "claim of an unworthy purpose does not destroy the privilege." *Id.* (quoting *Tenney*, 341 U.S. at 377). "Even for allegations involving racial animus . . . the Supreme Court has held that the legislative privilege stands fast." *Id.*

In *Hughes*, the United States and many private plaintiffs averred that an amendment to the Texas Election Code violated the Constitution and the VRA. *Id.* at 231–32. The private plaintiffs, but not the United States,[10] moved to compel production from "individual, non-party legislators related to the circumstances surrounding the amendment's proposal and passage." *Hughes*, 68 F.4th at 232. *Hughes* held that this case was not "one of those extraordinary instances" and that the legislative privilege did not yield in these circumstances. *Id.* at 237–40 (cleaned up).

A. The legislative privilege does not yield to the private plaintiffs.

The private plaintiffs in this case attempt to distinguish *Hughes* by noting that their case is "challenging statewide redistricting" and asserting that a legislative redistricting challenge "based on discriminatory intent and effects claims under the Voting Rights Act and the U.S. Constitution" is an extraordinary civil case. ECF No. 725 at 18. In their view, "[l]egislative redistricting is a *sui generis* process." *Id.* (quoting *Marylanders for Fair Representation, Inc. v. Schaefer*, 144 F.R.D 292, 304 (D. Md. 1992)). They contend that redistricting is unlike other forms of legislative activity because it establishes the electoral structure, thereby directly involving the self-interest of the

[10] An important distinction not mentioned by the defendants. *See* ECF No. 721 at 7.

legislators. *Id.* at 19. And since the legislative privilege does not apply "when 'Congress is ill equipped' to discipline or investigate itself," it should not apply when legislators are engaged in activities that directly involve their self-interest. ECF No. 728 at 13 (quoting *Brewster*, 408 U.S. at 513–14).

Regardless of the merits of this argument, it is foreclosed by *Hughes*. In *Hughes*, private plaintiffs were challenging amendments to the Texas Election Code related to "voter registration, voting by mail, poll watchers, and other aspects of election integrity and security." 68 F.4th at 231–32. That amendment affected who could vote (voter registration), how they could vote (voting by mail), and what the environment looks like when they vote (poll watchers)—allegedly in a racially discriminatory way. *Id.* at 232 ("[Plaintiffs] argued that the Legislature acted with racially discriminatory intent, and thus that the amendment violate[d] the Constitution and the Voting Rights Act.").

When legislators are determining who can vote and how, their self-interest is directly implicated because they are determining the composition of the electorate. *See, e.g.*, *League of Women Voters of Fla., Inc. v. Fla. Sec'y of State*, 66 F.4th 905, 924 (11th Cir. 2023) (discussing demographic differences in voters who vote by mail in Florida). Yet the *Hughes* court did not view this as an extraordinary civil case; meaning the Fifth Circuit did not see the legislators' self-interest in that case as precluding application of the privilege. *See* 68 F.4th at 237. If a legislator's self-interest in determining the composition of the electorate was not enough to make the case "extraordinary" in *Hughes*, then his or her self-interest in establishing the electoral structure likewise cannot justify precluding the application of the legislative privilege. *See* ECF No. 721 at 9–10.

The private plaintiffs also contend that upholding the legislative privilege in these circumstances is inconsistent with the privilege's purpose. They aver that the privilege is meant to be used "not for [a legislator's] private indulgences but for the public good." ECF No. 709 at 19 (quoting *Brewster*, 408 U.S. at 507). In the private plaintiffs' view, because the point of the legislative privilege is to protect the democratic process, it should yield when a lawsuit challenges a "stoppage in the democratic process." *Id.* at 19–20. Nevertheless, these policy-based arguments

do not change that *Hughes* upheld the privilege in remarkably similar circumstances. Therefore, the legislative privilege does not yield for the private plaintiffs in this case.[11]

B. The legislative privilege does not yield to the United States.

Hughes recognized that the legislative privilege "must yield" in "extraordinary civil cases." *See* 68 F.4th at 238 (cleaned up). That suggests that there must be some type of civil case in which the legislative privilege would yield to important federal interests.[12] Caselaw provides examples of what an extraordinary civil case is not: claims of racial gerrymandering brought by private plaintiffs,[13] claims that a state was deliberately discriminating against out of state actors,[14] and voting-rights claims brought by private plaintiffs.[15] But we know much less about what counts as an extraordinary civil case.[16]

We do know that for a case to be an "extraordinary" civil case there must be important federal interests. *Gillock*, 445 U.S. at 373. We also know that the only time a binding case has held that the legislative privilege yielded was in the context of a federal criminal prosecution—that is, an action brought by the United States as a sovereign enforcing its laws. *See id.*; *see also Berger v. United States*, 295 U.S. 78, 88 (1935) ("The United States Attorney is the representative not of an ordinary party to a controversy but of a sovereign[] . . . ."). In one place, *Hughes* frames the inquiry

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[11] We find the Eleventh Circuit's reasoning in *Pernell* on this point particularly persuasive. *See* 84 F.4th at 1344 ("'[T]here is a fundamental difference between actions by private plaintiffs and criminal prosecutions by the federal government.' Although the legislative privilege does not presumptive apply in the latter kind of case, the presumption otherwise holds firm." (internal citations omitted) (quoting *Hubbard*, 803 F.3d at 1311–12)).

[12] Though in fairness to the state defendants, neither the United States nor the private plaintiffs have cited to a binding civil case that was extraordinary enough to make the privilege yield.

[13] *Lee v. City of Los Angeles*, 908 F.3d. 1175, 1187–88 (9th Cir. 2018).

[14] *Am. Trucking*, 14 F.4th at 88.

[15] *Hughes*, 68 F.4th at 237–38.

[16] The private plaintiffs contend *In re Landry* established that redistricting litigation is an extraordinary civil case. 83 F.4th 300 (5th Cir. 2023). But *Landry* is inapposite. In that case, Louisiana sought a writ of mandamus directing the district court to reschedule a remedial hearing at which the district court was going to determine a court-ordered redistricting map before the state had an opportunity to revise the maps of its own accord. *Id.* at 304. In explaining why their "interven[tion] in a remedial proceeding for a preliminary injunction" via writ of mandamus was "[a]ppropriate under the circumstances," the Fifth Circuit said that redistricting "is not ordinary litigation" because the Supreme Court has required federal courts to "accommodate to the greatest extent the legislatures' ability to confect their own remedial plans." *Id.* at 307. The reference to redistricting litigation's being "not ordinary" was therefore a reference to redistricting's unique procedural posture stemming from the Supreme Court's requirement that states first be given a chance to remedy any defects before court intervention. *In re Landry* does not in any way elevate redistricting litigation to the status of an "extraordinary civil case" as *Hughes* used that phrase.

as whether compelling discovery here would be "closer on the continuum of legislative . . . privilege to the suits under 42 U.S.C. § 1983 at issue in *Tenney* and *Bogan* [*v. Scott-Harris*, 523 U.S. 44 (1998)] than it is to the criminal prosecution under federal law in *Gillock*." *Hughes*, 68 F.4th at 239. Moreover, *Hughes* cautions that this "extraordinary civil cases" exception cannot encompass so many civil cases that the exception "subsume[s]" the legislative privilege. *Id.* at 238. That is why the mere fact that "constitutional rights are at stake" or that there is a "claim of an unworthy purpose does not destroy the privilege." *Id.*

We can distill from this authority three elements that make a civil case extraordinary: (1) There must be important federal interests at stake beyond a mere constitutional or statutory claim involving racial animus, (2) the suit must be more like a federal criminal prosecution than a private plaintiff seeking to enforce his own rights, and (3) it cannot be the type of suit brought so easily that it would effectively destroy the privilege.

We do not doubt that the federal government has an interest in enforcing the VRA. However, this case is fundamentally disanalogous to a sovereign enforcing its criminal laws. Moreover, granting such a broad power to the United States would subsume the rule set out in *Hughes*.

1. The United States acting as intervenor in this case is not analogous to a sovereign enforcing its criminal laws.

It is true that unlike the plaintiffs in *Tenney* and *Bogan*, the United States is no mere private plaintiff. But the mere fact that the United States has brought suit is not enough for the legislative privilege to yield. *See infra*. And in the context of a VRA Section 2 suit, a suit brought by the United States is no more extraordinary than one brought by private plaintiffs for two reasons:

First, both private plaintiffs and the United States may bring suit under Section 2 of the VRA. *See* 52 U.S.C. § 10302(b)–(c); *see also Robinson v. Ardoin*, 86 F.4th 574, 588 (5th Cir. 2023). *But see Ark. State Conf. NAACP v. Ark. Bd. of Apportionment*, No. 22-1395, 2023 WL 8011300 (8th Cir. Nov. 20, 2023). That stands in stark contrast to the federal criminal prosecution in *Gillock* which could only have been brought by the United States.

Second, the relief available to the United States and to private plaintiffs are identical. *See id.* Any relief granted by the court—say, for example, an injunction of a racially gerrymandered

electoral map—is inherently non-excludable and thus necessarily accrues to all affected voters regardless of whether a VRA Section 2 suit is brought by a private plaintiff or the United States. That includes sovereign interests, to the extent any are vindicated by a successful VRA Section 2 suit.[17]

The failure of the state defendants to identify an example of extraordinary civil case does not make the "extraordinary civil case" language in *Hughes* a dead letter. Indeed, there are many lines at which we could delineate the extraordinary without adopting the United States' bold proposition. We could, for example, say that legislative privilege should yield to the United States when the United States is enforcing civil rights that individuals cannot enforce for themselves. But we need not take any position today on what is in fact extraordinary. All we need to decide is that this is not.

2. Granting the United States broad power to overcome legislative privilege would "subsume the rule."

In *Hughes*, the Fifth Circuit expressed great concern that the extraordinary-civil-case exception "not subsume the rule." 68 F.4th at 237. The court worried that "the privilege would be of little value" if courts classified so many cases as extraordinary that legislators would constantly "be subjected to the cost and inconvenience and distractions of a trial upon a conclusion of the pleader, or to hazard a judgment against them based upon a jury's speculation as to motives." *See id.* at 238 (quoting *Tenney*, 341 U.S. at 377).

The United States asserts that this case is an infrequent one. Indeed, "[i]n the redistricting cycle following the 2020 census, [they] have only challenged one State's redistricting plan." ECF No. 708 at 16 n.6. But, at issue is not what the United States has chosen to do, but what the United States could do. There is nothing that prevents the United States from intervening in every VRA Section 2 challenge to redistricting. Doing so would "subsume the rule," effectively abolishing legislative privilege in the context of drawing new electoral maps. It is possible that the United

[17] It is also worth noting the similarities to the United States' role in *Hughes*. While it is true that the United States in that case "did not join LULAC's motion to compel[,]" 2022 WL 2904741 at *2 (Brief for the United States as Appellee in *Hughes*), the United States was a party in that case and did argue in support of the private plaintiff's motion to compel in its brief. *Id.* Yet, even in that brief, the United States did not assert its sovereign interest. *See generally id*. Thus, *Hughes* did not resolve the issue that we have before us here.

States would accept a narrower ruling that just encapsulates vote-dilution redistricting cases because of such cases' emphasis on motivation. *See* ECF No. 727 at 9. But it is unclear that this narrows the number of cases in which the United States could abrogate legislative privilege by much.

IV. Whether privilege has been waived.

Even if a communication or document is protected by the legislative privilege, it is possible for a legislator to waive the protections of the privilege. *Hughes* held that the legislative privilege is waived when "the [l]egislator publicly reveals" documents or information. 68 F.4th at 237 (emphasis removed) (quotation omitted). But legislators do not waive the privilege merely by "communicat[ing] with parties outside the legislature . . . ." *Id.* at 236. That means that a legislator does not "publicly reveal" documents or information when they bring "third parties *into* the [legislative] process." *Id.* at 327. Rather, the legislative privilege is waived only when "legislators . . . send privileged documents to third parties *outside* the legislative process . . . ." *Id.*

Therefore, to determine whether a legislator has waived his or her legislative privilege by disclosing information to a third party, we must determine whether the legislator brought that third party "*into* the [legislative] process" (no waiver), or "sen[t] privileged documents to third parties *outside* the legislative process" (waiver). *Id.* The key to drawing this line is whether the legislator made the relevant information publicly accessible.[18] "[W]here the documents have been shared with some third parties—but haven't been shared publicly—the waiver argument fails" because those third parties have been brought into the legislative process. *Id.* But where documents or information have been made publicly accessible, the legislator has revealed those documents "to third parties *outside* the legislative process . . . ." *Id.*

In addition to following *Hughes'* command, distinguishing between waiver and non-waiver based on whether the legislator made the relevant information publicly accessible comports with common sense. The *Hughes* court held that it was not waiver for a legislator to disclose materials to a third party—including when that legislator "solicited [correspondence] from constituents."

[18] *Hughes* assessed public accessibility by stating that "[t]he very fact that Plaintiffs need discovery to access these documents shows that they have not been shared publicly" and therefore not waived. 68 F.4th at 237.

Id. at 236. Taken literally, this could include instances where a legislator brings constituents or industry groups "into" the legislative process by holding a town hall or public event "soliciting" feedback and advice on legislation. But this cannot mean information disclosed at public events is privileged—even the state defendants do not go so far. *See* ECF No. 721 at 23 ("To be sure, the public record is fair game."). On the other hand, if a legislator invites a constituent into his or her office to share the constituents' views on legislation, that encounter would likely be privileged under *Hughes*. The extent of the general public's access to this information explains this difference.

Thus, in determining whether any Texas legislators have waived their privilege, we look not only at whether they have disclosed information to a third party, but whether that disclosure resulted in the information becoming publicly accessible. A disclosure made to a third party brought "into" the legislative process will not be publicly accessible and there will be no waiver. Only upon a showing of public accessibility has the privilege been waived under *Hughes*.

Having determined that the state defendants have waived their legislative privilege in some circumstances, *see infra*, we must determine the scope of that waiver. The parties do not cite to any binding caselaw articulating the scope of a waiver of legislative privilege, and neither the Fifth Circuit nor the Supreme Court have answered that question. But—speaking about the attorney-client privilege—the Fifth Circuit has said that "[d]isclosure of any significant portion of a confidential communication waives the privilege as to the whole." *Indus. Clearinghouse, Inc. v. Browning Mfg. Div. of Emerson Elec. Co.*, 953 F.2d 1004, 1007 (5th Cir. 1992) (quoting *United States v. El Paso Co.*, 682 F.2d 530, 538 (5th Cir. 1982), *cert. denied*, 466 U.S. 944 (1984)). The idea behind this "partial waiver equals full waiver" rule is that a party should not be able to use the privilege to selectively disclose portions of communications or documents but withhold others in a way that favors them. *See, e.g.*, *United States v. Bilzerian*, 926 F.2d 1285, 1292 (2d Cir. 1991) ("[T]he attorney-client privilege cannot at once be used as a shield and a sword.").

Although *Browning* and *Bilzerian* were referring to the attorney-client privilege, the rationale for expanding the scope of the waiver in this way extends to the legislative privilege as well. *Accord Singleton v. Merrill*, 576 F. Supp. 3d 931, 940–41 (N.D. Ala. 2021) (quoting *Powell v. Ridge*, 247 F.3d 520, 525 (3d Cir. 2001)); *see also LULAC v. Abbott*, 601 F. Supp. 3d 147, 180 n.14 (W.D. Tex. 2022). Just like we do not want litigants selectively to use the attorney-client privilege

to make favorable disclosures, we do not want legislators to tip the scales of future or existing litigation by disclosing some favorable portions of a document publicly and keeping unfavorable portions behind closed doors.

The purpose of the legislative privilege "is not to protect against disclosure in general, but to foster the public good by protecting lawmakers from deterrents to the uninhibited discharge of their legislative duty." *Hughes*, 68 F.4th at 233 (quoting *Tenney*, 341 U.S. at 377); *see also Bogan*, 523 U.S. at 52. We want lawmakers to "focus on their jobs rather than on motions practice in lawsuits." *Hughes*, 68 F.4th at 237. These aims are not frustrated by a rule that expands the scope of waiver to include the whole document or communication when the legislative privilege has been waived as to a significant portion. The legislators are already in litigation and have already waived a "significant portion" of the privileged material; allowing the privilege to extend to the whole would not meaningfully increase the burden on lawmakers.

Therefore, to the extent that the Texas legislators have waived the legislative privilege with respect to a significant portion of any document or communication, the waiver applies to the whole document or communication.

V. The remaining discovery motions invoking legislative privilege.

Applying this rationale, the Court **ORDERS**:

- The United States' motion to compel legislative deposition testimony, ECF No. 522, is granted in part and denied in part.
- Private plaintiffs' amended motion to compel regarding portions of depositions subject to legislative privilege objections, ECF No. 555, is granted in part and denied in part.[19]
- The United States' third motion to compel legislative deposition testimony and private plaintiffs' joinder, ECF Nos. 600 and 602, is granted in part and denied in part.
- Private plaintiffs' motion to compel deposition testimony of Senator Brian Birdwell, ECF No. 649, is denied.
- The United States' fourth motion to compel legislative deposition testimony, ECF No. 636, is granted in part and denied in part.

[19] ECF No. 523 is denied as moot. *See* ECF No. 730.

- Private plaintiffs' motion to compel regarding portions of the re-opened depositions of Representatives Hunter and Murr subject to legislative privilege objections, ECF No. 638, is granted in part and denied in part.
- Private plaintiffs' motion to compel third-party subpoenas *duces tecum* to legislators, ECF No. 540, is granted in part and denied in part.
- The United States' motion to enforce third-party subpoenas *duces tecum*, ECF No. 351, is granted in part and denied in part.
- Private plaintiffs' motion to compel third-party subpoenas *duces tecum*, ECF No. 447, is granted in part and denied in part.
- Private plaintiffs' motion to compel third-party subpoena *duces tecum* to Anna Mackin, ECF No. 582, is granted in part and denied in part.
- The private plaintiffs' and the United States' motions to compel and unseal portions of depositions from Senator Joan Huffman, Senator Paul Bettencourt, and House Parliamentarian Sharon Carter, ECF Nos. 542 and 543, are granted in part and denied in part.
- The private plaintiffs' and United States' motions to compel production of OAG documents, ECF Nos. 527 and 548, are denied.
- The United States' motion to compel the Texas Legislative Counsel to produce documents, ECF No. 644, is denied.
- The United States' motion to enforce a document subpoena issued to Representative Mike Schofield, ECF No. 532, is denied.

The rulings in this order are subject to any withdrawals previously made by the state defendants. These orders do not resolve any issues of attorney-client privilege or work product; such issues will be resolved in a separate order. In addition, this order does not resolve the privilege objections contained in ECF No. 742.

Due to the volume of discovery materials dealt with in this order, the court has given individual, line-by-line, rulings for each invocation of the legislative privilege using the legend provided on the following page.

Code	Disposition
LP1	For the reasons stated in the court's order, the court finds the legislative privilege applies and has not been waived. Legislative privilege applies because the document or communication was created, received, or gathered in the sphere of legitimate legislative activity. Privilege has not been waived because the document or communication has not been publicly revealed. Nor is this an extraordinary case in which the legislative privilege must yield.
LP2	For the reasons stated in the court's order, the court finds the legislative privilege applies and has not been waived. Legislative privilege applies because the document or communication was created, received, or gathered in the sphere of legitimate legislative activity at the direction of, instruction of, or for a legislator. Privilege has not been waived because the document or communication has not been publicly revealed. Nor is this an extraordinary case in which the legislative privilege must yield.
LP3	The legislative privilege has been waived because this document or communication is public information.
LP4	The legislative privilege does not apply to matters that are neither inherently legislative nor indicative of a legislator's motives, such as routine administrative or executive matters.
Improper objection	The state defendants have not made a proper objection because their invocation of the legislative privilege occurred after plaintiffs' question was posed. *See Nguyen v. Excel Corp.*, 197 F.3d 200, 206 n.12 (5th Cir. 1999).
No response; No objection	State defendants did not meet their burden of demonstrating that the privilege applies.

So ORDERED and SIGNED this 21st day of December 2023.

JERRY E. SMITH
UNITED STATES CIRCUIT JUDGE

And on behalf of:

Jeffrey V. Brown
United States District Judge
Southern District of Texas

ECF No. 351

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0351075	Adam Foltz	XLSX	Jared May (TLC)	8/15/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351079	Adam Foltz	XLSX	Michael Hankins	8/13/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351080	Adam Foltz	XLSX	Adam Foltz	6/16/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351081	Adam Foltz	XLSX	Kurt Gore	12/15/2020					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351086	Adam Foltz	XLSX	JM	1/26/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351087	Adam Foltz	XLSX	JM	1/26/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351089	Adam Foltz	XLS		9/24/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351090	Adam Foltz	XLSX	Adam Foltz	8/16/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0351093	Adam Foltz	XLSX	Adam Foltz	8/13/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351094	Adam Foltz	XLSX	Adam Foltz	5/26/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351095	Adam Foltz	XLSX	Adam Foltz	8/18/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351098	Adam Foltz	XLSX		7/19/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351107	Adam Foltz	XLS		11/24/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351108	Adam Foltz	XLS		11/24/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351109	Adam Foltz	XLSX	Adam Foltz	11/22/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351110	Adam Foltz	XLSX	Adam Foltz	9/26/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0351111	Adam Foltz	XLSX	Adam Foltz	9/30/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351112	Adam Foltz	XLSX		10/5/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351113	Adam Foltz	XLS		10/11/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351114	Adam Foltz	XLS		10/11/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351115	Adam Foltz	XLSX		10/16/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351116	Adam Foltz	XLSX	Adam Foltz	10/2/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351117	Adam Foltz	XLSX	Adam Foltz	9/26/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351118	Adam Foltz	XLSX	Adam Foltz	10/2/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0351120	Adam Foltz	XLSX	Adam Foltz	9/29/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351122	Adam Foltz	XLS		10/13/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351123	Adam Foltz	XLSX	Adam Foltz	9/28/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351124	Adam Foltz	XLSX	Adam Foltz	9/25/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351125	Adam Foltz	XLSX	Adam Foltz	10/12/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351126	Adam Foltz	XLS		10/11/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351127	Adam Foltz	XLSX	Adam Foltz	8/16/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351129	Adam Foltz	XLSX	Adam Foltz	9/28/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0351130	Adam Foltz	XLSX		10/2/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351133	Adam Foltz	XLSX	Adam Foltz	10/2/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351134	Adam Foltz	XLSX	Adam Foltz	9/25/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351135	Adam Foltz	XLSX	Adam Foltz	9/25/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351137	Adam Foltz	XLSX	Adam Foltz	7/30/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351138	Adam Foltz	XLSX	Adam Foltz	9/28/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351139	Adam Foltz	XLSX	Adam Foltz	10/4/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351140	Adam Foltz	XLSX	Adam Foltz	10/4/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0351141	Adam Foltz	XLSX	Adam Foltz	10/4/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351142	Adam Foltz	XLSX	Adam Foltz	10/2/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351143	Adam Foltz	XLSX	Adam Foltz	10/4/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351144	Adam Foltz	XLSX	Adam Foltz	10/4/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351145	Adam Foltz	XLSX	Adam Foltz	10/4/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351146	Adam Foltz	XLSX	Adam Foltz	10/4/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351147	Adam Foltz	XLSX	Adam Foltz	10/4/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351148	Adam Foltz	XLSX	Adam Foltz	10/4/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0351150	Adam Foltz	XLSX	Adam Foltz	10/4/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351151	Adam Foltz	XLSX	Adam Foltz	10/4/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351152	Adam Foltz	XLSX	Adam Foltz	10/4/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351153	Adam Foltz	XLS		10/2/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351154	Adam Foltz	XLS		10/4/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351155	Adam Foltz	XLSX		10/11/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351156	Adam Foltz	XLSX		10/13/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351157	Adam Foltz	XLS		10/11/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0351158	Adam Foltz	XLSX		10/10/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351159	Adam Foltz	XLSX		10/10/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351160	Adam Foltz	XLSX		10/10/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351161	Adam Foltz	XLSX		10/11/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351163	Adam Foltz	XLSX	Adam Foltz	10/3/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351164	Adam Foltz	XLSX		10/11/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351165	Adam Foltz	XLSX	Adam Foltz	10/2/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351166	Adam Foltz	XLSX		10/4/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0351167	Adam Foltz	XLSX		10/10/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351168	Adam Foltz	XLSX	Adam Foltz	10/4/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351169	Adam Foltz	XLSX	Adam Foltz	10/4/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351170	Adam Foltz	XLSX	Adam Foltz	10/4/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351171	Adam Foltz	XLSX	Adam Foltz	10/4/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351172	Adam Foltz	XLSX		10/10/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351173	Adam Foltz	XLSX	Adam Foltz	10/4/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351174	Adam Foltz	XLSX	Adam Foltz	10/4/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0351176	Adam Foltz	XLSX	Adam Foltz	10/4/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351177	Adam Foltz	XLSX	Adam Foltz	10/4/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351178	Adam Foltz	XLSX		10/12/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351179	Adam Foltz	XLSX	Adam Foltz	10/4/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351180	Adam Foltz	XLSX	Adam Foltz	10/4/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351181	Adam Foltz	XLSX	Adam Foltz	10/4/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351182	Adam Foltz	XLSX	Adam Foltz	10/4/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351183	Adam Foltz	XLSX		10/9/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0351184	Adam Foltz	XLSX	Adam Foltz	10/2/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351185	Adam Foltz	XLSX		10/11/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351186	Adam Foltz	XLSX		10/9/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351187	Adam Foltz	XLSX		10/9/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351189	Adam Foltz	XLSX		10/11/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351190	Adam Foltz	XLSX		10/8/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351191	Adam Foltz	XLSX		10/10/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351192	Adam Foltz	XLSX		10/9/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0351193	Adam Foltz	XLSX		10/11/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351194	Adam Foltz	XLSX		10/9/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351195	Adam Foltz	XLSX		10/10/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351196	Adam Foltz	XLSX		10/10/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351197	Adam Foltz	XLSX		10/10/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351198	Adam Foltz	XLSX		10/11/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351199	Adam Foltz	XLS		10/11/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351200	Adam Foltz	XLSX		10/10/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0351202	Adam Foltz	XLS		10/10/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351203	Adam Foltz	XLSX		10/10/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351204	Adam Foltz	XLSX		10/9/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351205	Adam Foltz	XLSX		10/11/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351206	Adam Foltz	XLSX		10/11/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351207	Adam Foltz	XLSX		10/11/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351208	Adam Foltz	XLSX	Adam Foltz	10/7/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351209	Adam Foltz	XLSX	Adam Foltz	10/8/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0351210	Adam Foltz	XLSX		10/11/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351211	Adam Foltz	XLSX		10/11/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351212	Adam Foltz	XLSX		10/11/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351213	Adam Foltz	XLSX		10/11/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351215	Adam Foltz	XLSX		10/11/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351216	Adam Foltz	XLSX		10/10/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351217	Adam Foltz	XLSX		10/11/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351218	Adam Foltz	XLSX		10/10/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0351219	Adam Foltz	XLSX		10/11/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351220	Adam Foltz	XLSX		10/10/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351221	Adam Foltz	XLSX		10/10/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351222	Adam Foltz	XLSX		10/11/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351223	Adam Foltz	XLSX		10/11/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351224	Adam Foltz	XLSX		10/10/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351225	Adam Foltz	XLSM		10/11/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351226	Adam Foltz	XLSX		10/11/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0351228	Adam Foltz	XLSX		10/11/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351229	Adam Foltz	XLSX		10/10/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351230	Adam Foltz	XLS		10/11/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351231	Adam Foltz	XLSX		10/11/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351232	Adam Foltz	XLSX		10/11/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351233	Adam Foltz	XLSX	Adam Foltz	10/7/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351234	Adam Foltz	XLSX		10/10/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351235	Adam Foltz	XLSX		10/12/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0351236	Adam Foltz	XLSX		10/8/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351237	Adam Foltz	XLSX	Margo Cardwell (attorney)	10/4/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351238	Adam Foltz	XLSM		10/15/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351239	Adam Foltz	XLSM		10/15/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351241	Adam Foltz	XLSX		10/15/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351242	Adam Foltz	XLS		10/17/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351243	Adam Foltz	XLSX		10/16/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351244	Adam Foltz	XLS		10/16/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0351245	Adam Foltz	XLS		10/16/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351246	Adam Foltz	XLS		10/16/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351247	Adam Foltz	XLS		10/16/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351248	Adam Foltz	XLS		10/16/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351249	Adam Foltz	XLS		10/16/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351250	Adam Foltz	XLS		10/16/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351251	Adam Foltz	XLS		10/16/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351252	Adam Foltz	XLSM		10/15/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0351254	Adam Foltz	XLS		10/16/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351255	Adam Foltz	XLS		10/16/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351256	Adam Foltz	XLS		10/16/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351257	Adam Foltz	XLS		10/16/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351258	Adam Foltz	XLS		10/16/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351259	Adam Foltz	XLS		10/16/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351260	Adam Foltz	XLS		10/16/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351261	Adam Foltz	XLS		10/16/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0351262	Adam Foltz	XLS		10/16/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351263	Adam Foltz	XLS		10/16/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351264	Adam Foltz	XLS		10/16/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351265	Adam Foltz	XLS		10/16/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351267	Adam Foltz	XLS		10/16/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351268	Adam Foltz	XLS		10/16/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351269	Adam Foltz	XLS		10/16/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351309	Adam Foltz	XLSX	Adam Foltz	9/30/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.

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Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0351310	Adam Foltz	XLSX		9/29/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351316	Adam Foltz	XLS		9/29/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351326	Adam Foltz	XLSX	Adam Foltz	9/29/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351358	Adam Foltz	XLSX	Adam Foltz	10/14/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351359	Adam Foltz	XLSX	Adam Foltz	10/11/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351381	Adam Foltz	XLSX	Eric Wienckowski (retained by counsel as consulting expert, demographer)	9/20/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351416	Adam Foltz	XLSX		9/29/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351429	Adam Foltz	XLSX	Adam Foltz	9/28/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0351501	Adam Foltz	XLSX	Adam Foltz	9/30/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351503	Adam Foltz	XLSX	Adam Foltz	9/30/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351534	Adam Foltz	XLSX	Eric Wienckowski (retained by counsel as consulting expert, demographer)	10/15/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351536	Adam Foltz	XLSX	Eric Wienckowski (retained by counsel as consulting expert, demographer)	10/15/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351537	Adam Foltz	XLSX	Eric Wienckowski (retained by counsel as consulting expert, demographer)	10/14/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351550	Adam Foltz	XLSX	Eric Wienckowski (retained by counsel as consulting expert, demographer)	9/29/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351560	Adam Foltz	XLS	Bob West (part of team retained by counsel for consulting expertise for demography)	10/5/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351572	Adam Foltz	XLSX	Thomas Bryan	10/3/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0351574	Adam Foltz	XLSX	Thomas Bryan	10/3/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351576	Adam Foltz	XLSX	Eric Wienckowski (retained by counsel as consulting expert, demographer)	9/29/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351587	Adam Foltz	XLSX	Thomas Bryan	9/27/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351589	Adam Foltz	XLSX	Thomas Bryan	9/27/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351591	Adam Foltz	XLSX	Thomas Bryan	9/26/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351593	Adam Foltz	XLSX	Thomas Bryan	9/26/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351595	Adam Foltz	XLSX	Thomas Bryan	9/24/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351598	Adam Foltz	XLSX	Thomas Bryan	9/24/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0351600	Adam Foltz	XLSX	Thomas Bryan	9/24/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351615	Adam Foltz	XLSX	Eric Wienckowski (retained by counsel as consulting expert, demographer)	9/29/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351632	Adam Foltz	XLSX	Eric Wienckowski (retained by counsel as consulting expert, demographer)	9/29/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351633	Adam Foltz	XLSX	Eric Wienckowski (retained by counsel as consulting expert, demographer)	9/29/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351646	Adam Foltz	XLSX		9/30/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351659	Adam Foltz	XLSX	Eric Wienckowski (retained by counsel as consulting expert, demographer)	9/29/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351662	Adam Foltz	XLSX	Thomas Bryan	9/28/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351663	Adam Foltz	XLSX	Thomas Bryan	9/28/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0351665	Adam Foltz	XLSX	Eric Wienckowski (retained by counsel as consulting expert, demographer)	9/28/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351821	Adam Foltz	XLSX	Margo Cardwell (attorney)	10/12/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351823	Adam Foltz	XLSX	Margo Cardwell (attorney)	10/4/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351829	Adam Foltz	XLSX	Adam Foltz	10/4/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351834	Adam Foltz	XLSX	Adam Foltz	10/2/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351836	Adam Foltz	XLSX	Adam Foltz	10/4/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351839	Adam Foltz	XLSX	Adam Foltz	10/4/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351842	Adam Foltz	XLSX	Adam Foltz	10/4/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0351848	Adam Foltz	XLSX	Adam Foltz	10/4/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351851	Adam Foltz	XLSX	Adam Foltz	10/4/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351854	Adam Foltz	XLSX	Adam Foltz	10/4/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351862	Adam Foltz	XLSX	Adam Foltz	10/4/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351868	Adam Foltz	XLSX	Adam Foltz	10/4/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351870	Adam Foltz	XLSX	Adam Foltz	10/4/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351873	Adam Foltz	XLSX	Adam Foltz	10/3/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351882	Adam Foltz	XLSX	Adam Foltz	10/2/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0351884	Adam Foltz	XLSX	Adam Foltz	10/2/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351886	Adam Foltz	XLSX	Adam Foltz	10/2/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351888	Adam Foltz	XLSX	Adam Foltz	10/2/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351890	Adam Foltz	XLSX	Adam Foltz	10/2/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351895	Adam Foltz	XLSM		10/15/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351897	Adam Foltz	XLS							Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351899	Adam Foltz	XLSX		10/13/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351901	Adam Foltz	XLSX		10/12/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0351903	Adam Foltz	XLSX		10/12/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351904	Adam Foltz	XLSX		10/12/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351907	Adam Foltz	XLS		10/11/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351909	Adam Foltz	XLS		10/11/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351910	Adam Foltz	XLS		10/11/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351913	Adam Foltz	XLSX	Adam Foltz	10/11/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351916	Adam Foltz	XLSX		10/5/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351921	Adam Foltz	XLSX	Adam Foltz	10/3/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0351929	Adam Foltz	XLSX		10/4/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351935	Adam Foltz	XLSX	Adam Foltz	10/4/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351938	Adam Foltz	XLSX	Adam Foltz	10/2/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351941	Adam Foltz	XLSX	Adam Foltz	10/4/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351946	Adam Foltz	XLSX	Adam Foltz	10/4/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351951	Adam Foltz	XLSX	Adam Foltz	10/4/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351956	Adam Foltz	XLSX	Adam Foltz	10/4/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351959	Adam Foltz	XLSX	Adam Foltz	10/4/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0351962	Adam Foltz	XLSX	Adam Foltz	10/4/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351972	Adam Foltz	XLSX	Adam Foltz	10/2/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351975	Adam Foltz	XLSX	Adam Foltz	10/4/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351981	Adam Foltz	XLSX	Adam Foltz	10/4/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351988	Adam Foltz	XLSX	Adam Foltz	10/4/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351990	Adam Foltz	XLSX		9/30/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351993	Adam Foltz	XLSX	Adam Foltz	9/28/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351998	Adam Foltz	XLSX	Adam Foltz	9/26/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0352010	Adam Foltz	XLSX	Adam Foltz	9/26/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0352012	Adam Foltz	XLSX	Adam Foltz	9/25/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0352014	Adam Foltz	XLSX	Adam Foltz	9/25/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0352020	Adam Foltz	XLSX	Adam Foltz	9/30/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0352022	Adam Foltz	XLS		9/29/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0352026	Adam Foltz	XLSX	Adam Foltz	9/28/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0352051	Adam Foltz	XLSX		10/15/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0352058	Adam Foltz	XLSX	Adam Foltz	10/14/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0352070	Adam Foltz	XLSX	Adam Foltz	10/2/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0352082	Adam Foltz	XLSX	Adam Foltz	11/22/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0352411	Adam Foltz	XLSX	Jared May (TLC)	1/3/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0352412	Adam Foltz	XLSX	Kurt Gore	12/15/2020					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0352413	Adam Foltz	XLSX	Kurt Gore	12/14/2020					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0352416	Adam Foltz	XLSX	Jared May	1/3/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0352417	Adam Foltz	XLSX	Kurt Gore	12/14/2020					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0352418	Adam Foltz	XLSX	Kurt Gore	12/15/2020					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
PDOC_004320	Adam Foltz								Legislative; Attorney Client; Work Product	redistricting map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0000027	Anna Mackin	DOCX	Sean Opperman (attorney)	10/16/2021					Legislative; Attorney Client	congressional districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements. Includes contributions from counsel retained for the purpose of advising on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0000064	Anna Mackin	PDF							Legislative; Attorney Client; Work Product	congressional districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements. Includes contributions from counsel retained for the purpose of advising on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0000066	Anna Mackin	PDF							Legislative; Attorney Client; Work Product	congressional districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements. Includes contributions from counsel retained for the purpose of advising on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0000108	Anna Mackin	DOCX	Sean Opperman (attorney)	10/3/2021					Legislative; Attorney Client; Work Product	congressional districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	**WITHHOLD.** LP2.
DOC_0000199	Anna Mackin	DOCX	Sean Opperman (attorney)	10/16/2021					Legislative; Attorney Client	congressional districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	**WITHHOLD.** LP2.
DOC_0000280	Anna Mackin	DOCX	Anna Mackin (attorney)	10/17/2021					Legislative; Attorney Client	congressional districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	**WITHHOLD.** LP2.
DOC_0001432	Anna Mackin	PDF							Legislative; Attorney Client; Work Product	Analysis of draft redistricting leislation relating to congressional districts, with related data. Includes contributions and advice from counsel on the legality of the proposed legislation. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements. Includes contributions and advice from counsel on the	**WITHHOLD.** LP2.

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Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0001433	Anna Mackin	PDF		9/30/2021					Legislative; Attorney Client; Work Product	Analysis of draft redistricting leislation relating to congressional districts, with related data. Includes contributions and advice from counsel on the legality of the proposed legislation. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements. Includes contributions and advice from counsel on the	**WITHHOLD.** LP2.
DOC_0001512	Anna Mackin	PDF							Legislative; Attorney Client; Work Product	Analysis of draft redistricting leislation relating to congressional districts, with related data. Includes contributions and advice from counsel on the legality of the proposed legislation. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements. Includes contributions and advice from counsel on the	**WITHHOLD.** LP2.
DOC_0001513	Anna Mackin	PDF		10/4/2021					Legislative; Attorney Client; Work Product	Analysis of draft redistricting leislation relating to congressional districts, with related data. Includes contributions and advice from counsel on the legality of the proposed legislation. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements. Includes contributions and advice from counsel on the	**WITHHOLD.** LP2.
DOC_0001560	Anna Mackin	DOCX	Sean Opperman (attorney)	10/16/2021					Legislative; Attorney Client	[Analysis of draft redistricting legislation] relating to congressional districts, with related data. Includes contributions and advice from counsel on the legality of the proposed legislation. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements. Includes contributions and advice from counsel	**WITHHOLD.** LP2.
DOC_0001562	Anna Mackin	DOCX	Sean Opperman (attorney)	10/16/2021					Legislative; Attorney Client	Analysis of draft redistricting leislation relating to congressional districts, with related data. Includes contributions and advice from counsel on the legality of the proposed legislation. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements. Includes contributions and advice from counsel on the	**WITHHOLD.** LP2.
DOC_0001975	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	9/20/2021					Legislative; Attorney Client; Work Product	~~Talking points, notes, data, and other~~ materials regarding draft redistricting legislation relating to House districts, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
DOC_0001978	Senator Joan Huffman	DOCX	Anna Mackin (attorney)	10/7/2021					Legislative; Attorney Client; Work Product	~~Talking points, notes, data, and other~~ materials regarding draft redistricting legislation relating to House districts, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.

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Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0001979	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	10/3/2021					Legislative; Attorney Client; Work Product	regarding draft redistricting legislation relating to House districts, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
DOC_0001993	Senator Joan Huffman	DOCX	Anna Mackin (attorney)	9/29/2021					Legislative; Attorney Client; Work Product	regarding draft redistricting legislation relating to House districts, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
DOC_0001994	Senator Joan Huffman	DOCX	Sarah Willcox	10/12/2021					Legislative; Attorney Client; Work Product	regarding draft redistricting legislation relating to House districts, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
DOC_0001995	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	10/12/2021					Legislative; Attorney Client; Work Product	regarding draft redistricting legislation relating to House districts, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
DOC_0001996	Senator Joan Huffman	DOCX	Sarah Willcox	10/3/2021					Legislative; Attorney Client; Work Product	regarding draft redistricting legislation relating to House districts, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
DOC_0001997	Senator Joan Huffman	DOCX	Sarah Willcox	10/1/2021					Legislative; Attorney Client; Work Product	regarding draft redistricting legislation relating to House districts, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
DOC_0001999	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	10/1/2021					Legislative; Attorney Client; Work Product	regarding draft redistricting legislation relating to House districts, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
DOC_0002002	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	9/22/2021					Legislative; Attorney Client; Work Product	regarding draft redistricting legislation relating to House districts, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
DOC_0002005	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	9/24/2021					Legislative; Attorney Client; Work Product	regarding draft redistricting legislation relating to House districts, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
DOC_0002006	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	9/27/2021					Legislative; Attorney Client; Work Product	regarding draft redistricting legislation relating to House districts, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
DOC_0002007	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	9/28/2021					Legislative; Attorney Client; Work Product	regarding draft redistricting legislation relating to House districts, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
DOC_0002008	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	9/27/2021					Legislative; Attorney Client; Work Product	regarding draft redistricting legislation relating to House districts, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.

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Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0002011	Senator Joan Huffman	DOCX	Sarah Willcox	9/29/2021					Legislative; Attorney Client; Work Product	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
DOC_0002012	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	9/29/2021					Legislative; Attorney Client; Work Product	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
DOC_0002023	Senator Joan Huffman	DOCX	Anna Mackin (attorney)	10/12/2021					Legislative; Attorney Client; Work Product	Data relating to draft redistricting legislation for congressional districts, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
DOC_0002466	Senator Joan Huffman	DOCX	Anna Mackin (attorney)	3/13/2021					Legislative; Attorney Client; Work Product	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
DOC_0002481	Senator Joan Huffman	PDF		12/30/2019					Legislative; Attorney Client; Work Product	Data relating to draft redistricting legislation for congressional districts, including input from attorneys relating to proposed redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0002483	Senator Joan Huffman	PDF		12/31/2019					Legislative; Attorney Client; Work Product	Data relating to draft redistricting legislation for congressional districts, including input from attorneys relating to proposed redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0002487	Senator Joan Huffman	PDF		5/15/2020					Legislative; Attorney Client; Work Product	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
DOC_0353009	Senator Joan Huffman	PDF							Attorney Client; Work Product	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts, including input from attorneys relating to proposed redistricting legislation.	
DOC_0000077	Anna Mackin	DOCX		8/26/2021					Legislative; Attorney Client; Work Product	Calendar entries relating to redistricting, including hearings, and meetings with legislators and staffers.	**WITHHOLD.** LP2.
DOC_0000078	Anna Mackin	DOCX		8/26/2021					Legislative; Attorney Client; Work Product	Calendar entries relating to redistricting, including hearings, and meetings with legislators and staffers.	**WITHHOLD.** LP2.
DOC_0000344	Anna Mackin	DOCX	Wroe Jackson (Senator Huffman former general counsel)	7/16/2021					Legislative; Attorney Client; Work Product	Talking points, notes, data, and other materials prepared for Senator Huffman by Anna Mackin (attorney), reflecting and implicating legislative privileged thoughts, opinions, and mental impressions, as well as attorney advice and mental impressions.	**WITHHOLD.** LP2.
DOC_0000345	Anna Mackin	DOCX	Wroe Jackson (Senator Huffman former general counsel)	7/19/2021					Legislative; Attorney Client; Work Product	Talking points, notes, data, and other materials prepared for Senator Huffman by Anna Mackin (attorney), reflecting and implicating legislative privileged thoughts, opinions, and mental impressions, as well as attorney advice and mental impressions.	**WITHHOLD.** LP2.

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Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0000346	Anna Mackin	DOCX	Wroe Jackson (Senator Huffman former general counsel)	7/21/2021					Legislative; Attorney Client; Work Product	prepared for Senator Huffman by Anna Mackin (attorney), reflecting and implicating legislative privileged thoughts, opinions, and mental impressions, as well as attorney advice and mental impressions.	**WITHHOLD.** LP2.
DOC_0000349	Anna Mackin	DOCX	Wroe Jackson (Senator Huffman former general counsel)	5/7/2021					Legislative; Attorney Client; Work Product	prepared for Senator Huffman by Anna Mackin (attorney), reflecting and implicating legislative privileged thoughts, opinions, and mental impressions, as well as attorney advice and mental impressions.	**WITHHOLD.** LP2.
DOC_0000350	Anna Mackin	DOCX	Wroe Jackson (Senator Huffman former general counsel)	7/16/2021					Legislative; Attorney Client; Work Product	prepared for Senator Huffman by Anna Mackin (attorney), reflecting and implicating legislative privileged thoughts, opinions, and mental impressions, as well as attorney advice and mental impressions.	**WITHHOLD.** LP2.
DOC_0000351	Anna Mackin	DOCX	Sean Opperman (attorney)	8/26/2021					Legislative; Attorney Client; Work Product	prepared for Senator Huffman by Anna Mackin (attorney), reflecting and implicating legislative privileged thoughts, opinions, and mental impressions, as well as attorney advice and mental impressions.	**WITHHOLD.** LP2.
DOC_0000353	Anna Mackin	DOCX	Anna Mackin (attorney)	1/29/2021					Legislative; Attorney Client; Work Product	prepared for Senator Huffman by Anna Mackin (attorney), reflecting and implicating legislative privileged thoughts, opinions, and mental impressions, as well as attorney advice and mental impressions.	**WITHHOLD.** LP2.
DOC_0353498	Colleen Garcia	PDF		10/6/2021					Legislative; Attorney Client	Draft notice relating to House Redistricting Committee hearing. Includes contributions and advice from counsel on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0000269	Anna Mackin	DOCX	Anna Mackin (attorney)	10/5/2021					Legislative; Attorney Client; Work Product	Talking points for Senate Redistricting Committee hearing, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0000271	Anna Mackin	DOCX	Sean Opperman (attorney)	10/5/2021					Legislative; Attorney Client; Work Product	Talking points for Senate Redistricting Committee hearing, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0000293	Anna Mackin	DOCX	Anna Mackin (attorney)	9/29/2021					Legislative; Attorney Client; Work Product	Talking points for Senate Redistricting Committee hearing, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0000305	Anna Mackin	DOCX	Anna Mackin (attorney)	9/29/2021					Legislative; Attorney Client; Work Product	Talking points for Senate Redistricting Committee hearing, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0000306	Anna Mackin	DOCX	Anna Mackin (attorney)	9/24/2021					Legislative; Attorney Client; Work Product	Talking points for Senate Redistricting Committee hearing, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001977	Senator Joan Huffman	DOCX	Anna Mackin (attorney)	10/14/2021					Legislative; Attorney Client; Work Product	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0353008	Senator Joan Huffman	PDF							Attorney Client; Work Product	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts, including input from attorneys relating to proposed redistricting legislation.	
DOC_0352306	Adam Foltz	PDF							Legislative; Attorney Client	Confidential document relating to retention of counsel for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0352307	Adam Foltz	PDF							Legislative; Attorney Client	Confidential document relating to retention of counsel for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0000101	Anna Mackin	DOCX		8/27/2021					Legislative; Attorney Client	Confidential draft retention contract for use in connection with redistricting legislation.	**WITHHOLD.** LP2.
DOC_0000117	Anna Mackin	PDF		8/12/2021					Legislative; Attorney Client	Confidential invoice for legal services provided in connection with redistricting legislation, given to Senate Redistricting Committee staff.	**WITHHOLD.** LP2.
DOC_0000118	Anna Mackin	PDF		10/7/2021					Legislative; Attorney Client	Confidential invoice for legal services provided in connection with redistricting legislation, given to Senate Redistricting Committee staff.	**WITHHOLD.** LP2.
DOC_0000129	Anna Mackin	PDF		9/14/2021					Legislative; Attorney Client	Confidential draft retention contract for use in connection with redistricting legislation.	**WITHHOLD.** LP2.
DOC_0000213	Anna Mackin	PDF		4/13/2021	Lieutenant Governor Patrick; Senator Huffman	Lehostky Keller			Legislative; Attorney Client; Work Product	Confidential retention letter from Lehotsky Keller to Lieutenant Governor Patrick and Senator Huffman, setting forth scope of representation and describing related redistricting legal issues, made for the purpose of facilitating the rendition of legal advice regarding redistricting litigation. The retention of Lehotsky Kelly and the firm's scope of work also reveals mental impressions on legislative process and	**WITHHOLD.** LP2.
DOC_0000217	Anna Mackin	PDF		9/8/2021					Legislative; Attorney Client	Confidential draft retention contract for use in connection with redistricting legislation.	**WITHHOLD.** LP2.
DOC_0012239	Lieutenant Governor Dan Patrick	PDF		4/13/2021	Lieutenant Governor Patrick				Legislative; Attorney Client; Work Product	Confidential retention letter from outside attorneys to Lieutenant Governor Patrick for services in connection with considering redistricting legislation.	**WITHHOLD.** LP2.
DOC_0012240	Lieutenant Governor Dan Patrick	DOCX	Scott Keller (outside counsel)	3/26/2021	Lieutenant Governor Patrick				Legislative; Attorney Client; Work Product	Confidential retention letter from outside attorneys to Lieutenant Governor Patrick for services in connection with considering redistricting legislation.	**WITHHOLD.** LP2.
DOC_0012241	Lieutenant Governor Dan Patrick	DOCX	Scott Keller (outside counsel)	3/26/2021	Lieutenant Governor Patrick				Legislative; Attorney Client; Work Product	Confidential retention letter from outside attorneys to Lieutenant Governor Patrick for services in connection with considering redistricting legislation.	**WITHHOLD.** LP2.
DOC_0012398	Lieutenant Governor Dan Patrick	MSG			Jeff Archer (TLC) (TLC Executive Director)	Darrell Davila (Lt. Gov. Chief of Staff)	Joan Opperman (attorney); Anna Mackin (attorney); Chris Sterner (attorney); Alix Morris (attorney)		Legislative; Attorney Client	Confidential communication between Lieutenant Governor Patrick staff and TLC regarding invoice for legal services provided in connection with redistricting litigation.	**WITHHOLD.** LP2.
DOC_0012399	Lieutenant Governor Dan Patrick	PDF		10/7/2021					Legislative; Attorney Client; Work Product	Attached invoice to confidential communication between Lieutenant Governor Patrick staff and TLC regarding invoice for legal services provided in connection with redistricting litigation.	**WITHHOLD.** LP2.
DOC_0012419	Lieutenant Governor Dan Patrick	MSG		8/12/2021					Legislative; Attorney Client; Work Product	Attached invoice to confidential communication between Lieutenant Governor Patrick staff and TLC regarding invoice for legal services provided in connection with redistricting litigation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0012420	Lieutenant Governor Dan Patrick	DOCX		8/5/2021					Legislative; Attorney Client; Work Product	Attached invoice to confidential communication between Lieutenant Governor Patrick staff and TLC regarding invoice for legal services provided in connection with redistricting litigation.	**WITHHOLD.** LP2.
PDOC_001754	Representative Todd Hunter								Legislative; Attorney Client	Confidential invoices, identifying privileged work performed at the direction of legislative members or at the direction of counsel, for legal services rendered in connection with redistricting legislation.	**WITHHOLD.** LP2.
PDOC_001768	Representative Todd Hunter								Legislative; Attorney Client	Confidential invoices, identifying privileged work performed at the direction of legislative members or at the direction of counsel, for legal services rendered in connection with redistricting legislation.	**WITHHOLD.** LP2.
PDOC_001774	Representative Todd Hunter								Legislative; Attorney Client	Confidential invoices, identifying privileged work performed at the direction of legislative members or at the direction of counsel, for legal services rendered in connection with redistricting legislation.	**WITHHOLD.** LP2.
PDOC_001812	Representative Todd Hunter								Legislative; Attorney Client	Confidential invoices, identifying privileged work performed at the direction of legislative members or at the direction of counsel, for legal services rendered in connection with redistricting legislation.	**WITHHOLD.** LP2.
PDOC_001883	Representative Todd Hunter								Legislative; Attorney Client	Confidential invoices, identifying privileged work performed at the direction of legislative members or at the direction of counsel, for legal services rendered in connection with redistricting legislation.	**WITHHOLD.** LP2.
PDOC_001896	Representative Todd Hunter								Legislative; Attorney Client	Confidential invoices, identifying privileged work performed at the direction of legislative members or at the direction of counsel, for legal services rendered in connection with redistricting legislation.	**WITHHOLD.** LP2.
PDOC_001901	Representative Todd Hunter								Legislative; Attorney Client	Confidential invoices, identifying privileged work performed at the direction of legislative members or at the direction of counsel, for legal services rendered in connection with redistricting legislation.	**WITHHOLD.** LP2.
PDOC_001924	Representative Todd Hunter								Legislative; Attorney Client	Confidential invoices, identifying privileged work performed at the direction of legislative members or at the direction of counsel, for legal services rendered in connection with redistricting legislation.	**WITHHOLD.** LP2.
PDOC_001929	Representative Todd Hunter								Legislative; Attorney Client	Confidential invoices, identifying privileged work performed at the direction of legislative members or at the direction of counsel, for legal services rendered in connection with redistricting legislation.	**WITHHOLD.** LP2.
PDOC_001936	Representative Todd Hunter								Legislative; Attorney Client	Confidential invoices, identifying privileged work performed at the direction of legislative members or at the direction of counsel, for legal services rendered in connection with redistricting legislation.	**WITHHOLD.** LP2.
PDOC_001960	Representative Todd Hunter								Legislative; Attorney Client	Confidential invoices, identifying privileged work performed at the direction of legislative members or at the direction of counsel, for legal services rendered in connection with redistricting legislation.	**WITHHOLD.** LP2.

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Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
PDOC_001968	Representative Todd Hunter								Legislative; Attorney Client	performed at the direction of legislative members or at the direction of counsel, for legal services rendered in connection with redistricting legislation.	**WITHHOLD.** LP2.
PDOC_001986	Representative Todd Hunter								Legislative; Attorney Client	performed at the direction of legislative members or at the direction of counsel, for legal services rendered in connection with redistricting legislation.	**WITHHOLD.** LP2.
PDOC_001997	Representative Todd Hunter								Legislative; Attorney Client	performed at the direction of legislative members or at the direction of counsel, for legal services rendered in connection with redistricting legislation.	**WITHHOLD.** LP2.
DOC_0002550	Senator Joan Huffman	PDF		9/14/2021	Brad Lockerbie (consultant)	Senator Huffman			Legislative; Attorney Client; Work Product	of consultant in connection with redistricting legislation, including input from attorneys relating to proposed redistricting	**WITHHOLD.** LP1.
DOC_0002555	Senator Joan Huffman	PDF		9/8/2021	Brad Lockerbie (consultant)	Senator Huffman			Legislative; Attorney Client; Work Product	of consultant in connection with redistricting legislation, including input from attorneys relating to proposed redistricting	**WITHHOLD.** LP1.
DOC_0002557	Senator Joan Huffman	PDF		9/9/2021	Brad Lockerbie (consultant)	Senator Huffman			Legislative; Attorney Client; Work Product	of consultant in connection with redistricting legislation, including input from attorneys relating to proposed redistricting	**WITHHOLD.** LP1.
DOC_0002558	Senator Joan Huffman	XLSX	Sean Opperman (attorney)	3/29/2019	Brad Lockerbie (consultant)	Senator Huffman			Legislative; Attorney Client	of consultant in connection with redistricting legislation, including input from attorneys relating to proposed redistricting	**WITHHOLD.** LP1.
DOC_0351076	Adam Foltz	PDF		8/18/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351077	Adam Foltz	PDF		8/20/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351078	Adam Foltz	PDF		8/19/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.

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Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0351083	Adam Foltz	JPG	Adam Foltz						Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0351084	Adam Foltz	PDF		5/6/2016					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351085	Adam Foltz	PDF	TxDOT	4/23/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351096	Adam Foltz	PDF		2/10/2012					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351097	Adam Foltz	PDF		6/12/2019					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351099	Adam Foltz	PDF		8/26/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351100	Adam Foltz	PDF		3/1/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0351121	Adam Foltz	PDF		9/24/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351132	Adam Foltz	DOCX	Adam Foltz	7/27/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0351435	Adam Foltz	PDF							Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351436	Adam Foltz	PDF		9/29/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351504	Adam Foltz	MSG		9/22/2021	Tommie Cardin (attorney); Scott Field (attorney); Parker Berry (attorney)	Adam Foltz	Thomas Bryan (retained by counsel as consulting expert, demo grapher)		Legislative; Attorney Client; Work Product	legislation for Texas House districts prepared for and at the direction of Chairman Hunter reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions from outside counsel.	**WITHHOLD.** LP2.
DOC_0351541	Adam Foltz	PNG							Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351561	Adam Foltz	PNG							Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351562	Adam Foltz	PNG							Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0351563	Adam Foltz	PNG							Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351630	Adam Foltz	PDF		10/1/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351650	Adam Foltz	DOCX	Wilson Montjoy	10/8/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0351673	Adam Foltz	PDF		10/13/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351674	Adam Foltz	PDF		10/13/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351675	Adam Foltz	PDF		10/13/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351678	Adam Foltz								Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.

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Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0351679	Adam Foltz			10/13/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351682	Adam Foltz	PDF		10/13/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351683	Adam Foltz								Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351685	Adam Foltz								Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351686	Adam Foltz			10/13/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351687	Adam Foltz			10/13/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351689	Adam Foltz								Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0351690	Adam Foltz			10/12/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351691	Adam Foltz			10/13/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351693	Adam Foltz	PDF		10/6/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351703	Adam Foltz	PDF		10/6/2021					Legislative; Attorney Client	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351706	Adam Foltz	PDF		10/5/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351708	Adam Foltz	PDF		10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351709	Adam Foltz	PDF		10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0351710	Adam Foltz	PDF		10/3/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351712	Adam Foltz	PDF		10/1/2021					Legislative; Attorney Client	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351714	Adam Foltz	PDF		10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351716	Adam Foltz	PDF							Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351717	Adam Foltz	PDF		10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351718	Adam Foltz	PDF		10/4/2021					Legislative; Attorney Client	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351721	Adam Foltz	PDF		10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0351723	Adam Foltz	PDF		10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351724	Adam Foltz	PDF							Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351727	Adam Foltz	PDF		10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351728	Adam Foltz	PDF							Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351737	Adam Foltz	PDF		10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351739	Adam Foltz	PDF		10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351741	Adam Foltz	PDF		10/3/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0351742	Adam Foltz	PDF		10/3/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351743	Adam Foltz	PDF		10/2/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351745	Adam Foltz	DOCX		10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0351746	Adam Foltz	PDF		10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0351748	Adam Foltz	PDF		10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351749	Adam Foltz								Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351750	Adam Foltz			10/3/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0351755	Adam Foltz	PDF		10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351756	Adam Foltz			10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351758	Adam Foltz	PDF		10/3/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351759	Adam Foltz	PDF		10/3/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351760	Adam Foltz	PDF		10/2/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351762	Adam Foltz	DOCX		10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0351763	Adam Foltz	PDF		10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0351765	Adam Foltz	PDF		10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351766	Adam Foltz	PDF		10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351767	Adam Foltz			10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351769	Adam Foltz	PDF		10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351770	Adam Foltz								Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351773	Adam Foltz	PDF		10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351775	Adam Foltz	PDF		10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0351777	Adam Foltz	PDF		10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351779	Adam Foltz	PDF		10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351780	Adam Foltz	PDF		10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351781	Adam Foltz	PDF		10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351783	Adam Foltz	PDF		10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351785	Adam Foltz	PDF		10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351787	Adam Foltz	PDF		10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.

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Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0351789	Adam Foltz	PDF		10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351791	Adam Foltz	PDF		10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351793	Adam Foltz	PDF		10/3/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351797	Adam Foltz								Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351798	Adam Foltz	PDF		10/1/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351799	Adam Foltz			10/1/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351800	Adam Foltz	PDF	Eugenie Schieve	10/3/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0351802	Adam Foltz	PDF		10/3/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351805	Adam Foltz	PDF		10/3/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351807	Adam Foltz	PDF		10/3/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351809	Adam Foltz	PDF		10/3/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351811	Adam Foltz	PDF		10/3/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351813	Adam Foltz	PDF							Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351814	Adam Foltz	PDF		9/29/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0351819	Adam Foltz	DOCX	Margo Cardwell (attorney)	10/18/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0351827	Adam Foltz	XLSX	Adam Foltz	10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351830	Adam Foltz	PDF		10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351831	Adam Foltz	PDF		10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351832	Adam Foltz	PDF		10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351837	Adam Foltz	PDF		10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351840	Adam Foltz	PDF		10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0351843	Adam Foltz	PDF		10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351846	Adam Foltz	PDF		10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351849	Adam Foltz	PDF		10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351852	Adam Foltz	PDF		10/3/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351855	Adam Foltz	PDF		10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351857	Adam Foltz								Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351859	Adam Foltz			10/1/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0351860	Adam Foltz	PDF	Eugenie Schieve	10/3/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351863	Adam Foltz	PDF		10/3/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351865	Adam Foltz	PDF		10/3/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351867	Adam Foltz	PDF		10/3/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351871	Adam Foltz	PDF		10/3/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351923	Adam Foltz	PDF		10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351924	Adam Foltz								Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0351926	Adam Foltz			10/3/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351928	Adam Foltz	PDF	BEF	10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351932	Adam Foltz	PDF		10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351933	Adam Foltz	PDF		10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351937	Adam Foltz	PDF		10/1/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351940	Adam Foltz	PDF		10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351944	Adam Foltz	PDF							Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.

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Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0351945	Adam Foltz	PDF		10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351948	Adam Foltz	PDF		10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351949	Adam Foltz	PDF							Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351950	Adam Foltz	PDF		10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351954	Adam Foltz	PDF		10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351955	Adam Foltz	PDF		10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351958	Adam Foltz	PDF		10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0351961	Adam Foltz	PDF		10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351964	Adam Foltz	PDF		10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351969	Adam Foltz	DOCX		10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0351970	Adam Foltz	PDF		10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351974	Adam Foltz	PDF		10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351976	Adam Foltz	PDF		10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351977	Adam Foltz			10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0351979	Adam Foltz	PDF		10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351980	Adam Foltz								Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351982	Adam Foltz			10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351984	Adam Foltz	PDF		10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351987	Adam Foltz	PDF		10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0352016	Adam Foltz	PDF		9/24/2021					Legislative; Attorney Client; Work Product	legislation for Texas House districts prepared for and at the direction of Chairman Hunter reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions from outside counsel.	**WITHHOLD.** LP2.
DOC_0352017	Adam Foltz	XLS		9/24/2021					Legislative; Attorney Client; Work Product	legislation for Texas House districts prepared for and at the direction of Chairman Hunter reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions from outside counsel.	**WITHHOLD.** LP2.
DOC_0352048	Adam Foltz	PDF	BEF	10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.

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Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0352072	Adam Foltz	DOCX	Wilson Montjoy	10/8/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0352095	Adam Foltz	PDF		10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0352111	Adam Foltz	MSG		10/1/2021	Scott Field (attorney)	Worth Farabee	Adam Foltz		Legislative; Attorney Client; Work Product	legislation for Texas House districts prepared for and at the direction of Chairman Hunter reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions from outside counsel.	**WITHHOLD.** LP2.
DOC_0352157	Adam Foltz	PDF	Makayla Arthur	8/25/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0352238	Adam Foltz	PDF		9/17/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0352245	Adam Foltz	PDF		9/17/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0352246	Adam Foltz	PDF		9/17/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0352248	Adam Foltz	PDF		9/17/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.

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Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0352249	Adam Foltz	PDF		9/17/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0352250	Adam Foltz	PDF		9/17/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0352255	Adam Foltz	PDF		8/20/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0352256	Adam Foltz	PDF		8/19/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0352524	Adam Foltz	PDF		6/7/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0352525	Adam Foltz	PDF		8/2/2010					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0352526	Adam Foltz	PDF		7/29/2010					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0352527	Adam Foltz	PDF		6/7/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0352529	Adam Foltz	PDF		3/30/2015					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0352530	Adam Foltz	PDF		4/27/2015					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0352542	Adam Foltz	PDF		6/7/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0352543	Adam Foltz	PDF		3/30/2017					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0352544	Adam Foltz	PDF		7/29/2010					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0352545	Adam Foltz	PDF		5/12/2004					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.

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Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0352552	Adam Foltz	PDF		7/29/2010					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0352553	Adam Foltz	PDF		5/12/2004					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0352561	Adam Foltz	PDF		5/12/2004					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0352568	Adam Foltz	PDF		7/29/2010					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0352569	Adam Foltz	PDF		5/12/2004					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0352576	Adam Foltz	PDF		6/7/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0352577	Adam Foltz	PDF		3/1/2016					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0352578	Adam Foltz	PDF		3/24/2014					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0352579	Adam Foltz	PDF		7/29/2010					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0352580	Adam Foltz	PDF		5/12/2015					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0352587	Adam Foltz	PDF		7/7/2011					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0352588	Adam Foltz	PDF		4/28/2011					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0352594	Adam Foltz	PDF		2/21/2012					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0352595	Adam Foltz	PDF		5/30/2013					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.

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Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0352602	Adam Foltz	PDF		2/28/2012					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0352607	Adam Foltz	PDF		5/6/2016					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0352608	Adam Foltz	PDF		5/26/2017					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0352612	Adam Foltz	PDF		6/3/2019					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0352618	Adam Foltz	PDF		6/3/2019					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0352685	Adam Foltz	PDF		9/26/2021	Colleen Garcia; Todd Hunter; Angie Flores; Jerry Alvarez (Redistricting committee assistant clerk); Margo Cardwell (attorney); Scott Field (attorney)				Legislative; Attorney Client	Confidential communication between Adam Foltz and legislator and/or legislative staff regarding draft redistricting legislation regarding the Texas House districts. Includes contributions from counsel retained for the purpose of advising on the legality of the proposed legislation	**WITHHOLD.** LP2.
DOC_0352690	Adam Foltz	PDF		10/22/2021	Colleen Garcia; Todd Hunter; Angie Flores; Tommie Cardin (attorney); Scott Field (attorney)				Legislative; Attorney Client	and legislator and/or legislative staff regarding draft redistricting legislation regarding the Texas House districts. Includes contributions from counsel retained for the purpose of advising on the legality of the proposed legislation	**WITHHOLD.** LP2.
DOC_0352694	Adam Foltz	PDF		10/16/2021	Colleen Garcia; Todd Hunter; Scott Field (attorney); Margo Cardwell (attorney)				Legislative; Attorney Client	and legislator and/or legislative staff regarding draft redistricting legislation regarding the Texas House districts. Includes contributions from counsel retained for the purpose of advising on the legality of the proposed legislation	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0352695	Adam Foltz	PDF		9/27/2021	Colleen Garcia; Todd Hunter; Margo Cardwell (attorney); Tommie Cardin (attorney); Scott Field (attorney)				Legislative; Attorney Client	and legislator and/or legislative staff regarding draft redistricting legislation regarding the Texas House districts. Includes contributions from counsel retained for the purpose of advising on the legality of the proposed legislation	**WITHHOLD.** LP2.
DOC_0352702	Adam Foltz	PDF		10/15/2021	Margo Cardwell (attorney); Scott Field (attorney)				Legislative; Attorney Client	and legislator and/or legislative staff regarding draft redistricting legislation regarding the Texas House districts. Includes contributions from counsel retained for the purpose of advising on the legality of the proposed legislation	**WITHHOLD.** LP2.
DOC_0352704	Adam Foltz	PDF		10/17/2021	Parker Berry (attorney)				Legislative; Attorney Client	and legislator and/or legislative staff regarding draft redistricting legislation regarding the Texas House districts. Includes contributions from counsel retained for the purpose of advising on the legality of the proposed legislation	**WITHHOLD.** LP2.
DOC_0352707	Adam Foltz	PDF		10/16/2021	Scott Field (attorney); Parker Berry (attorney)				Legislative; Attorney Client	and legislator and/or legislative staff regarding draft redistricting legislation regarding the Texas House districts. Includes contributions from counsel retained for the purpose of advising on the legality of the proposed legislation	**WITHHOLD.** LP2.
DOC_0352715	Adam Foltz	PDF		9/27/2021	Todd Hunter; Angie Flores; Scott Field (attorney); Tommie Cardin (attorney)				Legislative; Attorney Client	and legislator and/or legislative staff regarding draft redistricting legislation regarding the Texas House districts. Includes contributions from counsel retained for the purpose of advising on the legality of the proposed legislation	**WITHHOLD.** LP2.
DOC_0352719	Adam Foltz	PDF		10/16/2021	Todd Hunter; Scott Field (attorney)				Legislative; Attorney Client	and legislator and/or legislative staff regarding draft redistricting legislation regarding the Texas House districts. Includes contributions from counsel retained for the purpose of advising on the legality of the proposed legislation	**WITHHOLD.** LP2.
DOC_0000065	Anna Mackin	PDF							Legislative; Attorney Client; Work Product	congressional districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements. Includes contributions from counsel retained for the purpose of advising on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0352728	Representative Jacey Jetton	PNG			Phil Stevenson	Representative Jetton			Legislative; Attorney Client	Confidential communication regarding draft redistricting legislation, including input from attorneys, relating to the proposed redistricting legislation.	**WITHHOLD.** LP1.
DOC_0352729	Representative Jacey Jetton	PNG			Gary Gates	Representative Jetton			Legislative; Attorney Client	Confidential communication regarding draft redistricting legislation, including input from attorneys, relating to the proposed redistricting legislation.	**WITHHOLD.** LP1.
DOC_0352730	Representative Jacey Jetton	PNG			Ron Reynolds	Representative Jetton			Legislative; Attorney Client	Confidential communication regarding draft redistricting legislation, including input from attorneys, relating to the proposed redistricting legislation.	**WITHHOLD.** LP1.
DOC_0352731	Representative Jacey Jetton	JPG			Gary Gates	Representative Jetton			Legislative; Attorney Client	Confidential communication regarding draft redistricting legislation, including input from attorneys, relating to the proposed redistricting legislation.	**WITHHOLD.** LP1.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0001986	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	10/17/2021					Legislative; Attorney Client; Work Product	Confidential draft document created as part of the process of drafting redistricting legislation relating to congressional districts, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
DOC_0001987	Senator Joan Huffman	DOCX	Allison Schmitz	10/16/2021					Legislative; Attorney Client; Work Product	Confidential draft document created as part of the process of drafting redistricting legislation relating to congressional districts, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
DOC_0001988	Senator Joan Huffman	DOCX	Allison Schmitz	10/16/2021					Legislative; Attorney Client; Work Product	Confidential draft document created as part of the process of drafting redistricting legislation relating to congressional districts, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
DOC_0001989	Senator Joan Huffman	DOCX	Zachary Stephenson	10/16/2021					Legislative; Attorney Client; Work Product	Confidential draft document created as part of the process of drafting redistricting legislation relating to congressional districts, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
DOC_0003075	Senator Joan Huffman	PDF		10/20/2021					Legislative; Attorney Client	Confidential communication regarding records request for materials relating to legislative redistricting, and internal communications on how to respond, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
DOC_0006639	Senator Joan Huffman	DOCX	Koy Kunkel	1/27/2021					Legislative; Attorney Client	Confidential notes relating to Senate Redistricting Committee hearings, prepared for Senator Huffman by her attorneys.	**WITHHOLD.** LP2.
DOC_0351414	Adam Foltz	MSG		9/29/2021	Tommie Cardin (attorney); Scott Field (attorney); Parker Berry (attorney)	Adam Foltz			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351421	Adam Foltz	MSG		9/27/2021	Tommie Cardin (attorney); Scott Field (attorney); Parker Berry (attorney)	Adam Foltz			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351427	Adam Foltz	MSG		9/29/2021	Tommie Cardin (attorney); Scott Field (attorney); Parker Berry (attorney)	Adam Foltz			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351434	Adam Foltz	MSG		10/1/2021	Tommie Cardin (attorney); Scott Field (attorney); Parker Berry (attorney)	Adam Foltz			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351437	Adam Foltz	MSG		9/26/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351443	Adam Foltz	MSG		9/23/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz	Thomas Bryan (retained by counsel as consulting expert, demo grapher)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351449	Adam Foltz	MSG		9/23/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz	Thomas Bryan (retained by counsel as consulting expert, demo grapher)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351455	Adam Foltz	MSG		9/26/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0351461	Adam Foltz	MSG		9/22/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz	Thomas Bryan (retained by counsel as consulting expert, demo grapher)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351470	Adam Foltz	MSG		9/26/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351476	Adam Foltz	MSG		9/29/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351482	Adam Foltz	MSG		9/15/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351484	Adam Foltz	MSG		9/24/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz	Thomas Bryan (retained by counsel as consulting expert, demo grapher)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351490	Adam Foltz	MSG		9/23/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz	Thomas Bryan (retained by counsel as consulting expert, demo grapher)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351492	Adam Foltz	MSG		9/15/2021	Scott Field (attorney); Tommie Cardin (attorney); Parker Berry (attorney)	Adam Foltz			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351496	Adam Foltz	MSG		9/13/2021	Tommie Cardin (attorney); Scott Field (attorney); Parker Berry (attorney)	Adam Foltz			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351500	Adam Foltz	MSG		9/30/2021	counsel as consulting expert, demographer); Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351502	Adam Foltz	MSG		9/30/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz	Thomas Bryan (retained by counsel as consulting expert, demo grapher)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351517	Adam Foltz	MSG		9/24/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz	Thomas Bryan (retained by counsel as consulting expert, demo grapher)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351522	Adam Foltz	MSG		9/24/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz	Thomas Bryan (retained by counsel as consulting expert, demo grapher)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351529	Adam Foltz	MSG		10/18/2021	Adam Foltz; Tommie Cardin (attorney); Scott Field (attorney)	Parker Berry (attorney)			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351530	Adam Foltz	MSG		10/15/2021	Adam Foltz	Parker Berry (attorney)			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.

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Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0351535	Adam Foltz	MSG		10/15/2021	Adam Foltz	Parker Berry (attorney)			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351538	Adam Foltz	MSG		10/15/2021	Adam Foltz	Parker Berry (attorney)			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351539	Adam Foltz	MSG		10/14/2021	Adam Foltz	Parker Berry (attorney)	Scott Field (attorney); Thomas Bryan (retained by counsel as consulting expert, demo grapher)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351540	Adam Foltz	MSG		10/14/2021	Adam Foltz	Parker Berry (attorney)	Scott Field (attorney); Thomas Bryan (retained by counsel as consulting expert, demo grapher)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351543	Adam Foltz	MSG		10/12/2021	Scott Field (attorney)	Parker Berry (attorney)	Adam Foltz		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351545	Adam Foltz	MSG		10/12/2021	Scott Field (attorney)	Parker Berry (attorney)	Adam Foltz		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351547	Adam Foltz	MSG		10/11/2021	Adam Foltz	Parker Berry (attorney)	Tommie Cardin (attorney); Scott Field (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351549	Adam Foltz	MSG		10/8/2021	Adam Foltz	Parker Berry (attorney)			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351557	Adam Foltz	MSG		10/6/2021	Adam Foltz	Parker Berry (attorney)			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351564	Adam Foltz	MSG		10/6/2021	Adam Foltz	Parker Berry (attorney)			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351566	Adam Foltz	MSG		10/6/2021	Adam Foltz	Parker Berry (attorney)			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351568	Adam Foltz	MSG		10/6/2021	Adam Foltz	Parker Berry (attorney)			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351569	Adam Foltz	MSG		10/5/2021	Adam Foltz	Parker Berry (attorney)			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351570	Adam Foltz	MSG		10/4/2021	Adam Foltz	Parker Berry (attorney)			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.

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Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0351571	Adam Foltz	MSG		10/3/2021	Adam Foltz	Parker Berry (attorney)	Scott Field (attorney); Tommie Cardin (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351573	Adam Foltz	MSG		10/3/2021	Adam Foltz	Parker Berry (attorney)	Scott Field (attorney); Tommie Cardin (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351575	Adam Foltz	MSG		10/3/2021	Adam Foltz	Parker Berry (attorney)	Tommie Cardin (attorney); Scott Field (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351577	Adam Foltz	MSG		10/2/2021	Adam Foltz	Parker Berry (attorney)	Tommie Cardin (attorney); Scott Field (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351578	Adam Foltz	MSG		10/2/2021	Adam Foltz	Parker Berry (attorney)	Tommie Cardin (attorney); Scott Field (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351579	Adam Foltz	MSG		10/1/2021	Scott Field (attorney)	Parker Berry (attorney)	Adam Foltz; Tommie Cardin (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351580	Adam Foltz	MSG		10/1/2021	Adam Foltz	Parker Berry (attorney)			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351583	Adam Foltz	MSG		9/29/2021	Adam Foltz	Parker Berry (attorney)	Tommie Cardin (attorney); Scott Field (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351584	Adam Foltz	MSG		9/29/2021	Scott Field (attorney)	Parker Berry (attorney)	Adam Foltz; Tommie Cardin (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351586	Adam Foltz	MSG		9/27/2021	Adam Foltz	Parker Berry (attorney)			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351588	Adam Foltz	MSG		9/27/2021	Adam Foltz	Parker Berry (attorney)			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351590	Adam Foltz	MSG		9/26/2021	Adam Foltz	Parker Berry (attorney)			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351592	Adam Foltz	MSG		9/26/2021	Adam Foltz	Parker Berry (attorney)			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351594	Adam Foltz	MSG		9/25/2021	Adam Foltz	Parker Berry (attorney)			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0351596	Adam Foltz	MSG		9/25/2021	counsel as consulting expert, demographer); Adam Foltz; Tommie Cardin (attorney); Scott Field (attorney)	Parker Berry (attorney)			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351597	Adam Foltz	MSG		9/24/2021	Adam Foltz	Parker Berry (attorney)			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351599	Adam Foltz	MSG		9/24/2021	Adam Foltz	Parker Berry (attorney)			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351601	Adam Foltz	MSG		10/12/2021	Margo Cardwell (attorney)	Scott Field (attorney)	Adam Foltz; Tommie Cardin (attorney); Parker Berry (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351602	Adam Foltz	MSG		10/12/2021	Adam Foltz; Tommie Cardin (attorney); Parker Berry (attorney)	Scott Field (attorney)	Margo Cardwell (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351603	Adam Foltz	MSG		10/12/2021	Adam Foltz; Tommie Cardin (attorney); Parker Berry (attorney)	Scott Field (attorney)	Margo Cardwell (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351604	Adam Foltz	MSG		10/12/2021	Parker Berry (attorney); Adam Foltz	Scott Field (attorney)			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351605	Adam Foltz	MSG		10/12/2021	Adam Foltz; Parker Berry (attorney)	Scott Field (attorney)			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351606	Adam Foltz	MSG		10/12/2021	Parker Berry (attorney)	Scott Field (attorney)	Adam Foltz		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351607	Adam Foltz	MSG		10/12/2021	Parker Berry (attorney)	Scott Field (attorney)	Adam Foltz		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351608	Adam Foltz	MSG		10/12/2021	Adam Foltz; Parker Berry (attorney)	Scott Field (attorney)			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351609	Adam Foltz	MSG		10/12/2021	Adam Foltz; Parker Berry (attorney)	Scott Field (attorney)			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351610	Adam Foltz	MSG		10/11/2021	Colleen Garcia; Adam Foltz; Tommie Cardin (attorney); Parker Berry (attorney)	Scott Field (attorney)			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351611	Adam Foltz	MSG		10/11/2021	Tommie Cardin (attorney); Parker Berry (attorney); Adam Foltz	Scott Field (attorney)	Colleen Garcia		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.

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DOC_0351612	Adam Foltz	MSG		10/8/2021	Adam Foltz	Scott Field (attorney)			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351613	Adam Foltz	MSG		10/6/2021	Adam Foltz	Scott Field (attorney)			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351614	Adam Foltz	MSG		10/4/2021	Adam Foltz	Scott Field (attorney)			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351616	Adam Foltz	MSG		10/3/2021	Tommie Cardin (attorney); Parker Berry (attorney); Adam Foltz	Scott Field (attorney)			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351617	Adam Foltz	MSG		10/2/2021	Tommie Cardin (attorney)	Scott Field (attorney)	Parker Berry (attorney); Adam Foltz		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351619	Adam Foltz	MSG		10/2/2021	Adam Foltz	Scott Field (attorney)	Tommie Cardin (attorney); Parker Berry (attorney); Colleen Garcia; Margo Cardwell (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351620	Adam Foltz	MSG		10/2/2021	Parker Berry (attorney)	Scott Field (attorney)	Adam Foltz; Tommie Cardin (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351621	Adam Foltz	MSG		10/2/2021	Adam Foltz	Scott Field (attorney)			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351622	Adam Foltz	PDF		10/1/2021	Chairman Todd Hunter; Margo Cardwell (attorney)	Tommie Cardin (attorney); Scott Field (attorney); Parker Berry (attorney)			Legislative; Attorney Client; Work Product	Confidential memorandum on counsel letterhead by counsel retained for the purpose of advising on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0351624	Adam Foltz	MSG		10/2/2021	Adam Foltz	Scott Field (attorney)	Tommie Cardin (attorney); Parker Berry (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351625	Adam Foltz	MSG		10/1/2021	Parker Berry (attorney)	Scott Field (attorney)	Adam Foltz; Tommie Cardin (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351626	Adam Foltz	MSG		10/1/2021	Adam Foltz	Scott Field (attorney)			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351627	Adam Foltz	PDF	kwelborn	9/30/2021	Chairman Todd Hunter; Margo Cardwell (attorney)	Tommie Cardin (attorney); Scott Field (attorney); Parker Berry (attorney)			Legislative; Attorney Client; Work Product	Confidential memorandum on counsel letterhead by counsel retained for the purpose of advising on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0351628	Adam Foltz	MSG		10/1/2021	Adam Foltz	Scott Field (attorney)	Tommie Cardin (attorney); Parker Berry (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351629	Adam Foltz	MSG		10/1/2021	Adam Foltz	Scott Field (attorney)	Tommie Cardin (attorney); Parker Berry (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.

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DOC_0351634	Adam Foltz	MSG		9/30/2021	Adam Foltz	Scott Field (attorney)			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351635	Adam Foltz	MSG		9/29/2021	Adam Foltz	Scott Field (attorney)	Tommie Cardin (attorney); Parker Berry (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351636	Adam Foltz	MSG		9/29/2021	Adam Foltz	Scott Field (attorney)	Tommie Cardin (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351637	Adam Foltz	MSG		9/29/2021	Adam Foltz; Tommie Cardin (attorney); Parker Berry (attorney)	Scott Field (attorney)			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351638	Adam Foltz	MSG		10/14/2021	Parker Berry (attorney); Adam Foltz	Thomas Bryan (retained by counsel as consulting expert, dem ographer)	Tommie Cardin (attorney); Scott Field (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351639	Adam Foltz	MSG		9/25/2021	Parker Berry (attorney); Adam Foltz; Tommie Cardin (attorney); Scott Field (attorney)	Thomas Bryan (retained by counsel as consulting expert, dem ographer)			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351640	Adam Foltz	MSG		9/25/2021	Adam Foltz; Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Thomas Bryan (retained by counsel as consulting expert, dem ographer)			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351641	Adam Foltz	MSG		9/25/2021	Adam Foltz; Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Thomas Bryan (retained by counsel as consulting expert, dem ographer)			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351642	Adam Foltz	MSG		9/24/2021	Adam Foltz; Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Thomas Bryan (retained by counsel as consulting expert, dem ographer)			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351643	Adam Foltz	MSG		9/24/2021	Adam Foltz; Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Thomas Bryan (retained by counsel as consulting expert, dem ographer)			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351644	Adam Foltz	MSG		9/23/2021	Adam Foltz; Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Thomas Bryan (retained by counsel as consulting expert, dem ographer)			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351647	Adam Foltz	MSG		9/30/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney); Adam Foltz	Thomas Bryan (retained by counsel as consulting expert, dem ographer)			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351648	Adam Foltz	MSG		9/30/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney); Adam Foltz	Thomas Bryan (retained by counsel as consulting expert, dem ographer)			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351649	Adam Foltz	MSG		10/8/2021	Adam Foltz	Tommie Cardin (attorney)	Scott Field (attorney); Parker Berry (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351651	Adam Foltz	MSG		10/2/2021	Parker Berry (attorney); Adam Foltz	Tommie Cardin (attorney)	Scott Field (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.

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DOC_0351652	Adam Foltz	MSG		10/2/2021	Adam Foltz; Parker Berry (attorney); Scott Field (attorney)	Tommie Cardin (attorney)	Colleen Garcia; Margo Cardwell (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351653	Adam Foltz	MSG		10/2/2021	Adam Foltz	Tommie Cardin (attorney)	Scott Field (attorney); Parker Berry (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351655	Adam Foltz	MSG		10/2/2021	Scott Field (attorney); Parker Berry (attorney)	Tommie Cardin (attorney)	Adam Foltz		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351656	Adam Foltz	MSG		10/2/2021	Adam Foltz	Tommie Cardin (attorney)	Scott Field (attorney); Parker Berry (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351658	Adam Foltz	MSG		9/29/2021	Adam Foltz	Tommie Cardin (attorney)			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351660	Adam Foltz	MSG		9/29/2021	Adam Foltz; Scott Field (attorney); Parker Berry (attorney)	Tommie Cardin (attorney)			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351661	Adam Foltz	MSG		9/28/2021	Adam Foltz	Tommie Cardin (attorney)			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351664	Adam Foltz	MSG		9/28/2021	Adam Foltz	Tommie Cardin (attorney)			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351666	Adam Foltz	MSG		10/16/2021	Scott Field (attorney); Tommie Cardin (attorney); Parker Berry (attorney); Adam Foltz	Colleen Garcia	Margo Cardwell (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351667	Adam Foltz	MSG		10/16/2021	Scott Field (attorney); Tommie Cardin (attorney); Parker Berry (attorney); Adam Foltz	Colleen Garcia	Margo Cardwell (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351672	Adam Foltz	MSG		10/15/2021	Adam Foltz; Scott Field (attorney); Tommie Cardin (attorney); Parker Berry (attorney)	Colleen Garcia			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351676	Adam Foltz	MSG		10/13/2021	Adam Foltz; Scott Field (attorney); Tommie Cardin (attorney); Parker Berry (attorney)	Colleen Garcia			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351681	Adam Foltz	MSG		10/13/2021	Adam Foltz; Scott Field (attorney); Tommie Cardin (attorney); Parker Berry (attorney)	Colleen Garcia			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351684	Adam Foltz	MSG		10/13/2021	Adam Foltz; Scott Field (attorney); Tommie Cardin (attorney); Parker Berry (attorney)	Colleen Garcia			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351688	Adam Foltz	MSG		10/13/2021	Adam Foltz; Scott Field (attorney); Tommie Cardin (attorney); Parker Berry (attorney)	Colleen Garcia			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.

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DOC_0351692	Adam Foltz	MSG		10/11/2021	Adam Foltz; Scott Field (attorney); Tommie Cardin (attorney); Parker Berry (attorney)	Colleen Garcia			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351694	Adam Foltz	MSG		10/11/2021	Adam Foltz; Scott Field (attorney); Tommie Cardin (attorney); Parker Berry (attorney)	Colleen Garcia			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351695	Adam Foltz	MSG		10/11/2021	Adam Foltz; Scott Field (attorney); Tommie Cardin (attorney); Parker Berry (attorney)	Colleen Garcia			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351698	Adam Foltz	MSG		10/11/2021	Adam Foltz; Scott Field (attorney); Tommie Cardin (attorney); Parker Berry (attorney)	Colleen Garcia			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351761	Adam Foltz	MSG		10/4/2021	Scott Field (attorney)	Colleen Garcia	Adam Foltz		Legislative; Attorney Client; Work Product	Confidential communication to House committee clerk and counsel retained to advise on the legality of redistricting legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351816	Adam Foltz	MSG		10/12/2021	Scott Field (attorney)	Margo Cardwell (attorney)	Adam Foltz; Tommie Cardin (attorney); Parker Berry (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351825	Adam Foltz	MSG		10/4/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz	Colleen Garcia; Margo Cardwell (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351828	Adam Foltz	MSG		10/4/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz	Colleen Garcia; Margo Cardwell (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351833	Adam Foltz	MSG		10/4/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351835	Adam Foltz	MSG		10/4/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz	Colleen Garcia; Margo Cardwell (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351838	Adam Foltz	MSG		10/4/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz	Colleen Garcia; Margo Cardwell (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351841	Adam Foltz	MSG		10/4/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz	Colleen Garcia; Margo Cardwell (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351844	Adam Foltz	MSG		10/4/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz	Colleen Garcia; Margo Cardwell (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351847	Adam Foltz	MSG		10/4/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz	Colleen Garcia; Margo Cardwell (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351853	Adam Foltz	MSG		10/4/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz	Colleen Garcia; Margo Cardwell (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.

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DOC_0351856	Adam Foltz	MSG		10/4/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz	Colleen Garcia; Margo Cardwell (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351861	Adam Foltz	MSG		10/4/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz	Colleen Garcia; Margo Cardwell (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351864	Adam Foltz	MSG		10/4/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz	Colleen Garcia; Margo Cardwell (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351866	Adam Foltz	MSG		10/4/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz	Colleen Garcia; Margo Cardwell (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351869	Adam Foltz	MSG		10/4/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz	Colleen Garcia; Margo Cardwell (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351872	Adam Foltz	MSG		10/3/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz	Colleen Garcia; Margo Cardwell (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351874	Adam Foltz	MSG		10/3/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351875	Adam Foltz	MSG		10/3/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz	Colleen Garcia; Margo Cardwell (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351876	Adam Foltz	MSG		10/2/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351881	Adam Foltz	MSG		10/2/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz	Colleen Garcia; Margo Cardwell (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351883	Adam Foltz	MSG		10/2/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz	Colleen Garcia; Margo Cardwell (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351885	Adam Foltz	MSG		10/2/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz	Colleen Garcia; Margo Cardwell (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351887	Adam Foltz	MSG		10/2/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz	Colleen Garcia; Margo Cardwell (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351889	Adam Foltz	MSG		10/2/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz	Colleen Garcia; Margo Cardwell (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351891	Adam Foltz	MSG		10/2/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.

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DOC_0351894	Adam Foltz	MSG		10/15/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz	Margo Cardwell (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351896	Adam Foltz	MSG		10/14/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz	Thomas Bryan (retained by counsel as consulting expert, demo grapher)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351898	Adam Foltz	MSG		10/13/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz	Margo Cardwell (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351900	Adam Foltz	MSG		10/12/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz	Margo Cardwell (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351902	Adam Foltz	MSG		10/12/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz	Margo Cardwell (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351905	Adam Foltz	MSG		10/12/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz	Margo Cardwell (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351906	Adam Foltz	MSG		10/11/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351908	Adam Foltz	MSG		10/11/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351911	Adam Foltz	MSG		10/11/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351915	Adam Foltz	MSG		10/5/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351917	Adam Foltz	MSG		10/5/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351918	Adam Foltz	MSG		10/5/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351919	Adam Foltz	MSG		10/4/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz	Colleen Garcia; Margo Cardwell (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351920	Adam Foltz	MSG		10/4/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz	Colleen Garcia; Margo Cardwell (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351922	Adam Foltz	MSG		10/4/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz	Colleen Garcia; Margo Cardwell (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.

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DOC_0351927	Adam Foltz	MSG		10/4/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz	Colleen Garcia; Margo Cardwell (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351930	Adam Foltz	MSG		10/4/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz	Colleen Garcia; Margo Cardwell (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351931	Adam Foltz	MSG		10/4/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz	Colleen Garcia; Margo Cardwell (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351936	Adam Foltz	MSG		10/4/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz	Colleen Garcia; Margo Cardwell (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351939	Adam Foltz	MSG		10/4/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz	Colleen Garcia; Margo Cardwell (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351942	Adam Foltz	MSG		10/4/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz	Colleen Garcia; Margo Cardwell (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351947	Adam Foltz	MSG		10/4/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz	Colleen Garcia; Margo Cardwell (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351952	Adam Foltz	MSG		10/4/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz	Colleen Garcia; Margo Cardwell (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351957	Adam Foltz	MSG		10/4/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz	Colleen Garcia; Margo Cardwell (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351960	Adam Foltz	MSG		10/4/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz	Colleen Garcia; Margo Cardwell (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351963	Adam Foltz	MSG		10/4/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz	Margo Cardwell (attorney); Colleen Garcia		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351965	Adam Foltz	MSG		10/4/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz	Colleen Garcia; Margo Cardwell (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351967	Adam Foltz	MSG		10/4/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz	Margo Cardwell (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351968	Adam Foltz	MSG		10/4/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz	Margo Cardwell (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351971	Adam Foltz	MSG		10/4/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz	Colleen Garcia; Margo Cardwell (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.

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DOC_0351973	Adam Foltz	MSG		10/4/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz	Colleen Garcia; Margo Cardwell (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351978	Adam Foltz	MSG		10/4/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz	Colleen Garcia; Margo Cardwell (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351983	Adam Foltz	MSG		10/4/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz	Colleen Garcia; Margo Cardwell (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351986	Adam Foltz	MSG		10/4/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz	Colleen Garcia; Margo Cardwell (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351989	Adam Foltz	MSG		9/30/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351992	Adam Foltz	MSG		9/28/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351994	Adam Foltz	MSG		9/27/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351995	Adam Foltz	MSG		9/26/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351997	Adam Foltz	MSG		9/26/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351999	Adam Foltz	MSG		9/26/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352004	Adam Foltz	MSG		9/26/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352009	Adam Foltz	MSG		9/26/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz	Thomas Bryan (retained by counsel as consulting expert, demo grapher)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352011	Adam Foltz	MSG		9/25/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz	Thomas Bryan (retained by counsel as consulting expert, demo grapher)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352013	Adam Foltz	MSG		9/25/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz	Thomas Bryan (retained by counsel as consulting expert, demo grapher)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352015	Adam Foltz	MSG		9/24/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz	Thomas Bryan (retained by counsel as consulting expert, demo grapher)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.

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DOC_0352018	Adam Foltz	MSG		9/24/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz	Thomas Bryan (retained by counsel as consulting expert, demo grapher)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352019	Adam Foltz	MSG		9/30/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352021	Adam Foltz	MSG		9/29/2021	Tommie Cardin (attorney); Scott Field (attorney)	Adam Foltz			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352023	Adam Foltz	MSG		9/29/2021	Tommie Cardin (attorney); Scott Field (attorney)	Adam Foltz			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352025	Adam Foltz	MSG		9/28/2021	Tommie Cardin (attorney); Scott Field (attorney)	Adam Foltz			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352027	Adam Foltz	MSG		10/8/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352029	Adam Foltz	MSG		9/23/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz	Thomas Bryan (retained by counsel as consulting expert, demo grapher)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352034	Adam Foltz	MSG		10/14/2021	Tommie Cardin (attorney)	Adam Foltz	Thomas Bryan (retained by counsel as consulting expert, demo grapher)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352042	Adam Foltz	MSG		10/2/2021	Tommie Cardin (attorney)	Adam Foltz			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352043	Adam Foltz	MSG		9/30/2021	counsel as consulting expert, demographer); Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352044	Adam Foltz	MSG		10/8/2021	Scott Field (attorney); Tommie Cardin (attorney); Parker Berry (attorney)	Adam Foltz			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352045	Adam Foltz	MSG		9/29/2021	Scott Field (attorney); Tommie Cardin (attorney)	Adam Foltz			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352046	Adam Foltz	MSG		10/11/2021	Scott Field (attorney)	Adam Foltz			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352047	Adam Foltz	MSG		10/4/2021	Scott Field (attorney)	Adam Foltz			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352049	Adam Foltz	MSG		10/2/2021	Scott Field (attorney)	Adam Foltz	Tommie Cardin (attorney); Parker Berry (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352050	Adam Foltz	MSG		10/15/2021	Parker Berry (attorney); Tommie Cardin (attorney); Scott Field (attorney)	Adam Foltz			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352057	Adam Foltz	MSG		10/14/2021	Parker Berry (attorney); Tommie Cardin (attorney); Scott Field (attorney)	Adam Foltz	Thomas Bryan (retained by counsel as consulting expert, demo grapher)'		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352065	Adam Foltz	MSG		10/5/2021	Parker Berry (attorney); Tommie Cardin (attorney); Scott Field (attorney)	Adam Foltz			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.

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DOC_0352066	Adam Foltz	MSG		10/12/2021	Parker Berry (attorney)	Adam Foltz			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352068	Adam Foltz	MSG		10/5/2021	Parker Berry (attorney)	Adam Foltz			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352069	Adam Foltz	MSG		10/4/2021	Parker Berry (attorney)	Adam Foltz			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
PDOC_004309	Adam Foltz			10/2/2021	Scott Field (attorney); Parker Berry (attorney)	Tommie Cardin (attorney)			Legislative; Attorney Client; Work Product	Confidential communication from counsel retained for the purpose of advising on the legality of redistricting legislation, relating to draft proposal.	**WITHHOLD.** LP2.
PDOC_004318	Adam Foltz			10/3/2021	Chairman Todd Hunter	Butler Snow LLP			Legislative; Attorney Client; Work Product	Confidential memorandum on counsel letterhead by counsel retained for the purpose of advising on the legality of the proposed legislation.	**WITHHOLD.** LP2.
PDOC_004321	Adam Foltz			10/3/2021	Chairman Todd Hunter	Butler Snow LLP			Legislative; Attorney Client; Work Product	Confidential memorandum on counsel letterhead by counsel retained for the purpose of advising on the legality of the proposed legislation.	**WITHHOLD.** LP2.
PDOC_004324	Adam Foltz			9/30/2021	Margo Cardwell (attorney); Colleen Garcia; Adam Foltz; Angie Flores	Butler Snow LLP			Legislative; Attorney Client; Work Product	Confidential memorandum on counsel letterhead by counsel retained for the purpose of advising on the legality of the proposed legislation.	**WITHHOLD.** LP2.
PDOC_004383	Adam Foltz			7/19/2021		Butler Snow LLP			Legislative; Attorney Client; Work Product	Confidential memorandum on counsel letterhead by counsel retained for the purpose of advising on the legality of the proposed legislation.	**WITHHOLD.** LP2.
PDOC_004795	Colleen Garcia				Chairman Todd Hunter	Butler Snow LLP			Legislative; Attorney Client; Work Product	Confidential memorandum on counsel letterhead by counsel retained for the purpose of advising on the legality of the proposed legislation.	**WITHHOLD.** LP2.
PDOC_004798	Colleen Garcia			10/2/2021	Scott Field (attorney); Parker Berry	Tommie Cardin (attorney)			Legislative; Attorney Client; Work Product	Confidential communication regarding draft legislation for House districting, from counsel retained for the purpose of advising on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0351136	Adam Foltz	XLSX	Thomas Bryan (retained by counsel as consulting expert,	7/21/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351381	Adam Foltz	XLSX	Eric Wienckowski (retained by counsel as consulting expert,	9/20/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351494	Adam Foltz	MSG		9/15/2021	Tommie Cardin (attorney)	Adam Foltz	Thomas Bryan (retained by counsel as consulting expert, demo grapher)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351534	Adam Foltz	XLSX	Eric Wienckowski (retained by counsel as consulting expert,	10/15/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0351536	Adam Foltz	XLSX	Eric Wienckowski (retained by counsel as consulting expert,	10/15/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351537	Adam Foltz	XLSX	Eric Wienckowski (retained by counsel as consulting expert,	10/14/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351550	Adam Foltz	XLSX	Eric Wienckowski (retained by counsel as consulting expert,	9/29/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351576	Adam Foltz	XLSX	Eric Wienckowski (retained by counsel as consulting expert,	9/29/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351581	Adam Foltz	MSG		9/30/2021	Scott Field (attorney)	Parker Berry (attorney)	Tommie Cardin (attorney); Adam Foltz; Thomas Bryan (retained by counsel as consulting expert, demo grapher)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351582	Adam Foltz	XLSX	Thomas Bryan	9/24/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351632	Adam Foltz	XLSX	Eric Wienckowski (retained by counsel as consulting expert,	9/29/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351633	Adam Foltz	XLSX	Eric Wienckowski (retained by counsel as consulting expert,	9/29/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351645	Adam Foltz	MSG		9/30/2021	Parker Berry (attorney); Scott Field (attorney); Adam Foltz; Eric Wienckowski (retained by counsel as consulting expert, demographer)	Thomas Bryan (retained by counsel as consulting expert, dem ographer)			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.

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DOC_0351659	Adam Foltz	XLSX	Eric Wienckowski (retained by counsel as consulting expert,	9/29/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351665	Adam Foltz	XLSX	Eric Wienckowski (retained by counsel as consulting expert,	9/28/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0012001	Representative Philip Cortez	PDF			Hannah Reinhard (Rep. Cortez Legislative Director)	Ramiro Canales (attorney for consultant)			Legislative; Attorney Client	Representative Cortez and/or his staff regarding draft redistricting legislation, reflecting privileged information, including thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0351105	Adam Foltz	XLSX	Adam Foltz	7/14/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351119	Adam Foltz	XLSX	Adam Foltz	7/30/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351136	Adam Foltz	XLSX	Thomas Bryan (retained by counsel as consulting expert, demographer)	7/21/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351149	Adam Foltz	XLSX	Adam Foltz	10/4/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351162	Adam Foltz	XLSX	Adam Foltz	10/2/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351175	Adam Foltz	XLSX		10/4/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0351188	Adam Foltz	XLSX		10/6/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351201	Adam Foltz	XLSX		10/10/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351214	Adam Foltz	XLSX		10/10/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351227	Adam Foltz	XLSX		10/11/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351240	Adam Foltz	XLSX		10/15/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351253	Adam Foltz	XLS		10/16/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351266	Adam Foltz	XLS		10/16/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351376	Adam Foltz	JPG							Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0351542	Adam Foltz	MSG		10/12/2021	Scott Field (attorney); Adam Foltz	Parker Berry (attorney)			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.

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DOC_0351631	Adam Foltz	MSG		10/1/2021	Adam Foltz	Scott Field (attorney)			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351654	Adam Foltz	XLSX		10/2/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351677	Adam Foltz	PDF		10/13/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351680	Adam Foltz	MSG		10/13/2021	Adam Foltz; Scott Field (attorney); Tommie Cardin (attorney); Parker Berry (attorney)	Colleen Garcia			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained for the purpose of advising on the legality of the proposed legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351699	Adam Foltz	MSG		10/10/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351700	Adam Foltz	MSG		10/8/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351701	Adam Foltz	MSG		10/8/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351702	Adam Foltz	MSG		10/7/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351704	Adam Foltz	MSG		10/5/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351705	Adam Foltz	PDF							Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351707	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351711	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351713	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351715	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351719	Adam Foltz	MSG		10/4/2021	Edward Jaax; Adam Foltz	Colleen Garcia			Legislative; Attorney Client	Confidential communication to House committee clerk and other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351720	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client	Confidential communication to House committee clerk and other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351722	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client	Confidential communication to House committee clerk and other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351726	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351730	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.

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DOC_0351732	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351736	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351738	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351740	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351744	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351747	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351751	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351752	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351754	Adam Foltz	PDF		10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351757	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351764	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351771	Adam Foltz			10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351772	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351774	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351776	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351778	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351782	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351786	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351788	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351790	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351792	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351794	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.

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DOC_0351795	Adam Foltz	PDF		10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351796	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351801	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351803	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351804	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351806	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351808	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351810	Adam Foltz	MSG		10/3/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351812	Adam Foltz	MSG		9/29/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351815	Adam Foltz	MSG		9/27/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351818	Adam Foltz	MSG		10/18/2021	Colleen Garcia; Adam Foltz	Margo Cardwell (attorney)			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351822	Adam Foltz	MSG		10/9/2021	Adam Foltz	Margo Cardwell (attorney)			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351824	Adam Foltz	MSG		10/8/2021	Adam Foltz	Margo Cardwell (attorney)			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351826	Adam Foltz	PDF		10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351845	Adam Foltz	XLSX	Adam Foltz	10/4/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351850	Adam Foltz	MSG		10/4/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz	Colleen Garcia; Margo Cardwell (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.

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DOC_0351858	Adam Foltz	PDF		10/1/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351892	Adam Foltz	XLSX	Adam Foltz	10/2/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351925	Adam Foltz	XLSX		10/4/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351934	Adam Foltz	PDF		10/3/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351966	Adam Foltz	PDF		10/4/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351985	Adam Foltz	XLSX	Adam Foltz	10/4/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0351991	Adam Foltz	MSG		9/28/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352019	Adam Foltz	MSG		9/30/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz			Legislative; Attorney Client	Confidential communication to counsel retained to advise on legality of redistricting legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352021	Adam Foltz	MSG		9/29/2021	Tommie Cardin (attorney); Scott Field (attorney)	Adam Foltz			Legislative; Attorney Client	Confidential communication to counsel retained to advise on legality of redistricting legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352023	Adam Foltz	MSG		9/29/2021	Tommie Cardin (attorney); Scott Field (attorney)	Adam Foltz			Legislative; Attorney Client	Confidential communication to counsel retained to advise on legality of redistricting legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.

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DOC_0352024	Adam Foltz	PDF		9/29/2021					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0352025	Adam Foltz	MSG		9/28/2021	Tommie Cardin (attorney); Scott Field (attorney)	Adam Foltz			Legislative; Attorney Client	Confidential communication to counsel retained to advise on legality of redistricting legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352027	Adam Foltz	MSG		10/8/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz			Legislative; Attorney Client	Confidential communication to counsel retained to advise on legality of redistricting legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352028	Adam Foltz	MSG		9/30/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz			Legislative; Attorney Client	Confidential communication to counsel retained to advise on legality of redistricting legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352042	Adam Foltz	MSG		10/2/2021	Tommie Cardin (attorney)	Adam Foltz			Legislative; Attorney Client	Confidential communication to counsel retained to advise on legality of redistricting legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352044	Adam Foltz	MSG		10/8/2021	Scott Field (attorney); Tommie Cardin (attorney); Parker Berry (attorney)	Adam Foltz			Legislative; Attorney Client	Confidential communication to counsel retained to advise on legality of redistricting legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352045	Adam Foltz	MSG		9/29/2021	Scott Field (attorney); Tommie Cardin (attorney)	Adam Foltz			Legislative; Attorney Client	Confidential communication to counsel retained to advise on legality of redistricting legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352046	Adam Foltz	MSG		10/11/2021	Scott Field (attorney)	Adam Foltz			Legislative; Attorney Client	Confidential communication to counsel retained to advise on legality of redistricting legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352047	Adam Foltz	MSG		10/4/2021	Scott Field (attorney)	Adam Foltz			Legislative; Attorney Client	Confidential communication to counsel retained to advise on legality of redistricting legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352050	Adam Foltz	MSG		10/15/2021	Parker Berry (attorney); Tommie Cardin (attorney); Scott Field (attorney)	Adam Foltz			Legislative; Attorney Client	Confidential communication to counsel retained to advise on legality of redistricting legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352065	Adam Foltz	MSG		10/5/2021	Parker Berry (attorney); Tommie Cardin (attorney); Scott Field (attorney)	Adam Foltz			Legislative; Attorney Client	Confidential communication to counsel retained to advise on legality of redistricting legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352066	Adam Foltz	MSG		10/12/2021	Parker Berry (attorney)	Adam Foltz			Legislative; Attorney Client	Confidential communication to counsel retained to advise on legality of redistricting legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352067	Adam Foltz	XLSX	Margo Cardwell (attorney)	10/12/2021					Legislative; Attorney Client; Work Product	proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Also used by counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0352068	Adam Foltz	MSG		10/5/2021	Parker Berry (attorney)	Adam Foltz			Legislative; Attorney Client	Confidential communication to counsel retained to advise on legality of redistricting legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352071	Adam Foltz	MSG		10/9/2021	Margo Cardwell (attorney)	Adam Foltz			Legislative; Attorney Client	Confidential communication to counsel retained to advise on legality of redistricting legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352073	Adam Foltz	MSG		10/8/2021	Margo Cardwell (attorney)	Adam Foltz	Scott Field (attorney)		Legislative; Attorney Client	Confidential communication to counsel retained to advise on legality of redistricting legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352074	Adam Foltz	MSG		10/12/2021	Colleen Garcia	Adam Foltz			Legislative; Attorney Client	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352075	Adam Foltz	MSG		10/4/2021	Colleen Garcia	Adam Foltz			Legislative; Attorney Client	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.

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Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0352076	Adam Foltz	MSG		10/3/2021	Colleen Garcia	Adam Foltz			Legislative; Attorney Client	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352094	Adam Foltz	MSG		10/4/2021	Adam Foltz; Margo Cardwell (attorney)	Mark Wimmer	Jeff Archer (TLC)		Legislative; Attorney Client; Work Product	Confidential communication to attorney retained to advise on legality of redistricting legislation, as well as to other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352096	Adam Foltz	MSG		10/15/2021	Adam Foltz	Jared May (TLC)			Legislative; Attorney Client	Confidential communication to Texas Legislative Council staff relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352097	Adam Foltz	MSG		10/15/2021	Adam Foltz	Jared May (TLC)			Legislative; Attorney Client	Confidential communication to Texas Legislative Council staff relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352098	Adam Foltz	MSG		10/14/2021	Adam Foltz	Jared May (TLC)			Legislative; Attorney Client	Confidential communication to Texas Legislative Council staff relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352106	Adam Foltz	MSG		10/2/2021	Adam Foltz	Jared May (TLC)			Legislative; Attorney Client	Confidential communication to Texas Legislative Council staff relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352107	Adam Foltz	MSG		9/29/2021	Adam Foltz	Jared May (TLC)			Legislative; Attorney Client	Confidential communication to Texas Legislative Council staff relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352108	Adam Foltz	MSG		9/25/2021	Adam Foltz	Jared May (TLC)			Legislative; Attorney Client	Confidential communication to Texas Legislative Council staff relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352109	Adam Foltz	MSG		9/28/2021	Victoria Smith; Adam Foltz	Rita Pantillion (TLC)			Legislative; Attorney Client	Confidential communication to Texas Legislative Council staff relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352110	Adam Foltz	MSG		10/4/2021	Adam Foltz	Trey Burke			Legislative; Attorney Client	Confidential communication to Texas Legislative Council staff relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352122	Adam Foltz	MSG		10/15/2021	Jared May (TLC)	Adam Foltz			Legislative; Attorney Client	Confidential communication to Texas Legislative Council staff relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352123	Adam Foltz	MSG		10/14/2021	Jared May (TLC)	Adam Foltz			Legislative; Attorney Client	Confidential communication to Texas Legislative Council staff relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352124	Adam Foltz	MSG		10/2/2021	Jared May (TLC)	Adam Foltz			Legislative; Attorney Client	Confidential communication to Texas Legislative Council staff relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352125	Adam Foltz	MSG		9/29/2021	Jared May (TLC)	Adam Foltz			Legislative; Attorney Client	Confidential communication to Texas Legislative Council staff relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352560	Adam Foltz	PDF		7/29/2010					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0352601	Adam Foltz	PDF		12/27/2012					Legislative; Attorney Client; Work Product	map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation. Includes contributions from counsel retained for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
PDOC_004009	Adam Foltz			9/15/2021	Members of the House Redistricting Committee	Jeff Archer (TLC)			Legislative; Attorney Client	Confidential communication from TLC to members of the House Redistricting Committee relating to the use of RedAppl.	**WITHHOLD.** LP2.

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Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
PDOC_004318	Adam Foltz			10/3/2021	Chairman Todd Hunter	Butler Snow LLP			Legislative; Attorney Client	Confidential memorandum on counsel letterhead by counsel retained for the purpose of advising on the legality of the proposed legislation.	**WITHHOLD.** LP2.
PDOC_004321	Adam Foltz			10/3/2021	Chairman Todd Hunter	Butler Snow LLP			Legislative; Attorney Client	Confidential memorandum on counsel letterhead by counsel retained for the purpose of advising on the legality of the proposed legislation.	**WITHHOLD.** LP2.
PDOC_004324	Adam Foltz			9/30/2021	Margo Cardwell (attorney); Colleen Garcia; Adam Foltz; Angie Flores	Butler Snow LLP			Legislative; Attorney Client	Confidential memorandum on counsel letterhead by counsel retained for the purpose of advising on the legality of the proposed legislation.	**WITHHOLD.** LP2.
PDOC_004383	Adam Foltz			7/19/2021		Butler Snow LLP			Legislative; Attorney Client	Confidential memorandum on counsel letterhead by counsel retained for the purpose of advising on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0000077	Anna Mackin	DOCX		8/26/2021					Legislative; Attorney Client	Calendar entries relating to redistricting, including hearings, and meetings with legislators and staffers.	**WITHHOLD.** LP2.
DOC_0000078	Anna Mackin	DOCX		8/26/2021					Legislative; Attorney Client	Calendar entries relating to redistricting, including hearings, and meetings with legislators and staffers.	**WITHHOLD.** LP2.
DOC_0000093	Anna Mackin	PDF	Jordan Deathe (Senate Research Center)	9/29/2021					Legislative; Attorney Client; Work Product	Confidential Senate Research Center analysis of Senate Redistricting Committee hearing, sent to committee members, and kept in Senator Huffman's personal files for the purpose of considering redistricting legislation.	**WITHHOLD.** LP2.
DOC_0000094	Anna Mackin	PDF	Jo Walston (Senate Research Center)	10/1/2021					Legislative; Attorney Client; Work Product	Confidential Senate Research Center analysis of Senate Redistricting Committee hearing, sent to committee members, and kept in Senator Huffman's personal files for the purpose of considering redistricting legislation.	**WITHHOLD.** LP2.
DOC_0000095	Anna Mackin	PDF	Kenneth Bryan (Senate Research Center)	2/22/2021					Legislative; Attorney Client; Work Product	Confidential Senate Research Center analysis of Senate Redistricting Committee hearing, sent to committee members, and kept in Senator Huffman's personal files for the purpose of considering redistricting legislation.	**WITHHOLD.** LP2.
DOC_0000096	Anna Mackin	PDF	Kenneth Bryan (Senate Research Center)	3/11/2021					Legislative; Attorney Client; Work Product	Confidential Senate Research Center analysis of Senate Redistricting Committee hearing, sent to committee members, and kept in Senator Huffman's personal files for the purpose of considering redistricting legislation.	**WITHHOLD.** LP2.
DOC_0000097	Anna Mackin	PDF	Kenneth Bryan (Senate Research Center)	3/15/2021					Legislative; Attorney Client; Work Product	Confidential Senate Research Center analysis of Senate Redistricting Committee hearing, sent to committee members, and kept in Senator Huffman's personal files for the purpose of considering redistricting legislation.	**WITHHOLD.** LP2.
DOC_0000098	Anna Mackin	PDF	Andrew Robison (Senate Research Center)	3/16/2021					Legislative; Attorney Client; Work Product	Confidential Senate Research Center analysis of Senate Redistricting Committee hearing, sent to committee members, and kept in Senator Huffman's personal files for the purpose of considering redistricting legislation.	**WITHHOLD.** LP2.
DOC_0000106	Anna Mackin	PDF	Sean Opperman (attorney)	9/23/2021					Legislative; Attorney Client; Work Product	Attachment to confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0000267	Anna Mackin	DOCX	Anna Mackin (attorney)	10/17/2021					Legislative; Attorney Client; Work Product	Confidential Senate Research Center analysis of Senate Redistricting Committee hearing, sent to committee members, and kept in Senator Huffman's personal files for the purpose of considering redistricting legislation, relating to congressional districts, prepared by Anna Mackin (attorney) for Senator Huffman's use in considering redistricting legislation, reflecting and implicating legislative and attorney privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.

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Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0000270	Anna Mackin	DOCX	Anna Mackin (attorney)	10/7/2021					Legislative; Attorney Client; Work Product	relating to congressional districts, prepared by Anna Mackin (attorney) for Senator Huffman's use in considering redistricting legislation, reflecting and implicating legislative and attorney privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0000273	Anna Mackin	DOCX	Anna Mackin (attorney)	10/16/2021					Legislative; Attorney Client; Work Product	relating to congressional districts, prepared by Anna Mackin (attorney) for Senator Huffman's use in considering redistricting legislation, reflecting and implicating legislative and attorney privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0000372	Anna Mackin	MSG		1/9/2021	Sean Opperman (attorney)	Jeff Archer (TLC)	Anna Mackin (attorney); Karina Davis		Legislative; Attorney Client; Work Product	redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0000975	Anna Mackin	MSG		1/17/2021	Anna Mackin (attorney)	Sean Opperman (attorney)			Legislative; Attorney Client; Work Product	redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0001064	Anna Mackin	MSG		9/11/2021	Anna Mackin (attorney)	Jared May (TLC)			Legislative; Attorney Client; Work Product	redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0001080	Anna Mackin	MSG			Anna Mackin (attorney)	Sean Opperman (attorney)			Legislative; Attorney Client; Work Product	redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0001173	Anna Mackin	MSG			Scott Keller (attorney)	Darrell Davila	Chris Sterner (attorney); Alix Morris (attorney); Sean Opperman (attorney) ; Anna Mackin (attorney); Todd Disher		Legislative; Attorney Client; Work Product	redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	**WITHHOLD.** LP2.

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Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0001204	Anna Mackin	MSG		3/27/2021	Hammond; Angus Lupton; Anna Barnett; Anna Mackin (attorney); Britton Davis; Caity Jackson; Carrie Smith; Cody Terry; Deisy Jaimes; Doug Clements; Drew Tedford; Grecia Galvan; Jason Kirksey; Kenneth Bryan; Koy Kunkel; Lara Wendler; Lauren Cacheaux; Luis Moreno; Marc Salvato; Matthew Dowling; Paul Emerson; Pearl Cruz; Randy Samuelson; Ruben Oâ€™Bell; Rudy England; Ryan Alter; Shelby Corine; Stacey Chamberlin; Sushma Smith; Tomas	Sean Opperman (attorney)			Legislative; Attorney Client; Work Product	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0001244	Anna Mackin	MSG		7/29/2021	Hammond; Angus Lupton; Anna Barnett; Anna Mackin (attorney); Britton Davis; Caity Jackson; Carrie Smith; Cody Terry; Deisy Jaimes; Doug Clements; Drew Tedford; Grecia Galvan; Jason Kirksey; Kenneth Bryan; Koy Kunkel; Lara Wendler; Lauren Cacheaux; Luis Moreno; Marc Salvato; Matthew Dowling; Paul Emerson; Pearl Cruz; Randy Samuelson; Ruben Oâ€™Bell; Rudy England; Ryan Alter; Shelby Corine; Stacey Chamberlin; Sushma Smith; Tomas	Sean Opperman (attorney)			Legislative; Attorney Client; Work Product	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0001431	Anna Mackin	MSG		9/30/2021	Sean Opperman (attorney); Anna Mackin (attorney)	Jared May (TLC)			Legislative; Attorney Client; Work Product	redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0001434	Anna Mackin	MSG		10/2/2021	Jared May (TLC); Anna Mackin (attorney)	Sean Opperman (attorney)			Legislative; Attorney Client; Work Product	redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0001455	Anna Mackin	MSG		10/1/2021	Anna Mackin (attorney)	Sean Opperman (attorney)			Legislative; Attorney Client; Work Product	redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0001456	Anna Mackin	PDF		10/1/2021					Legislative; Attorney Client; Work Product	regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0001457	Anna Mackin	PDF		10/1/2021					Legislative; Attorney Client; Work Product	regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0001458	Anna Mackin	PDF		10/1/2021					Legislative; Attorney Client; Work Product	regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0001459	Anna Mackin	PDF		10/1/2021					Legislative; Attorney Client; Work Product	regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0001473	Anna Mackin	MSG		10/3/2021	Anna Mackin (attorney)	Christopher Hilton (attorney)			Legislative; Attorney Client; Work Product	redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0001474	Anna Mackin	DOCX	Sean Opperman (attorney)	10/3/2021					Attorney Client; Work Product	regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	
DOC_0001508	Anna Mackin	MSG		10/4/2021	Sean Opperman (attorney); Anna Mackin (attorney)	Jared May (TLC)			Legislative; Attorney Client; Work Product	redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0001509	Anna Mackin	MSG		10/4/2021	Jared May (TLC); Anna Mackin (attorney)	Sean Opperman (attorney)			Legislative; Attorney Client; Work Product	redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0001511	Anna Mackin	MSG		10/5/2021	Sean Opperman (attorney); Anna Mackin (attorney)	Jared May (TLC)			Legislative; Attorney Client; Work Product	redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0001514	Anna Mackin	MSG		10/8/2021	Jared May (TLC); Anna Mackin (attorney)	Sean Opperman (attorney)			Legislative; Attorney Client; Work Product	redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0001539	Anna Mackin	MSG		10/8/2021	Sean Opperman (attorney); Anna Mackin (attorney)	Jared May (TLC)			Legislative; Attorney Client; Work Product	redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0001563	Anna Mackin	MSG		10/17/2021	Sean Opperman (attorney); Anna Mackin (attorney)	Jared May (TLC)			Legislative; Attorney Client; Work Product	redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	**WITHHOLD.** LP2.
PDOC_000000478 4	Colleen Garcia								Legislative; Attorney Client; Work Product	Confidential confidential document relating to draft redistricting legislation, prepared by counsel retained for the purpose of advising on the legality of the proposed legislation.	**WITHHOLD.** LP2.
PDOC_000000478 8	Colleen Garcia								Legislative; Attorney Client; Work Product	Confidential confidential document relating to draft redistricting legislation, prepared by counsel retained for the purpose of advising on the legality of the proposed legislation.	**WITHHOLD.** LP2.
PDOC_004792	Colleen Garcia								Legislative; Attorney Client; Work Product	Confidential confidential document relating to draft redistricting legislation, prepared by counsel retained for the purpose of advising on the legality of the proposed legislation.	**WITHHOLD.** LP2.
PDOC_004795	Colleen Garcia				Chairman Todd Hunter	Butler Snow LLP			Legislative; Attorney Client	Confidential memorandum on counsel letterhead by counsel retained for the purpose of advising on the legality of the proposed legislation.	**WITHHOLD.** LP2.
PDOC_004797	Colleen Garcia								Legislative; Attorney Client; Work Product	Confidential confidential document relating to draft redistricting legislation, prepared by counsel retained for the purpose of advising on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0012507	Lieutenant Governor Dan Patrick	PNG			Darrell Davila (Lt. Gov. Chief of Staff)	Scott Keller (attorney)			Attorney Client; Work Product	Confidential communication between Darrell Davila and attorney, made for the purpose of facilitating the rendition of legal advice in connection with redistricting legislation.	
DOC_0012508	Lieutenant Governor Dan Patrick	PNG			Darrell Davila (Lt. Gov. Chief of Staff)	Scott Keller (attorney)			Attorney Client; Work Product	Confidential communication between Darrell Davila and attorney, made for the purpose of facilitating the rendition of legal advice in connection with redistricting legislation.	
DOC_0012509	Lieutenant Governor Dan Patrick	PNG			Darrell Davila (Lt. Gov. Chief of Staff)	Scott Keller (attorney)			Attorney Client; Work Product	Confidential communication between Darrell Davila and attorney, made for the purpose of facilitating the rendition of legal advice in connection with redistricting legislation.	
DOC_0012510	Lieutenant Governor Dan Patrick	PNG			Darrell Davila (Lt. Gov. Chief of Staff)	Scott Keller (attorney)			Attorney Client; Work Product	Confidential communication between Darrell Davila and attorney, made for the purpose of facilitating the rendition of legal advice in connection with redistricting legislation.	
DOC_0012511	Lieutenant Governor Dan Patrick	PNG			Darrell Davila (Lt. Gov. Chief of Staff)	Scott Keller (attorney)			Attorney Client; Work Product	Confidential communication between Darrell Davila and attorney, made for the purpose of facilitating the rendition of legal advice in connection with redistricting legislation.	
DOC_0012512	Lieutenant Governor Dan Patrick	PNG			Darrell Davila (Lt. Gov. Chief of Staff)	Scott Keller (attorney)			Attorney Client; Work Product	Confidential communication between Darrell Davila and attorney, made for the purpose of facilitating the rendition of legal advice in connection with redistricting legislation.	
DOC_0012514	Lieutenant Governor Dan Patrick	PNG			Darrell Davila (Lt. Gov. Chief of Staff)	Scott Keller (attorney)			Attorney Client; Work Product	Confidential communication between Darrell Davila and attorney, made for the purpose of facilitating the rendition of legal advice in connection with redistricting legislation.	

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Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0012515	Lieutenant Governor Dan Patrick	PNG			Darrell Davila (Lt. Gov. Chief of Staff)	Scott Keller (attorney)			Attorney Client; Work Product	Confidential communication between Darrell Davila and attorney, made for the purpose of facilitating the rendition of legal advice in connection with redistricting legislation.	
DOC_0012516	Lieutenant Governor Dan Patrick	PNG			Darrell Davila (Lt. Gov. Chief of Staff)	Scott Keller (attorney)			Attorney Client; Work Product	Confidential communication between Darrell Davila and attorney, made for the purpose of facilitating the rendition of legal advice in connection with redistricting legislation.	
DOC_0012517	Lieutenant Governor Dan Patrick	PNG			Darrell Davila (Lt. Gov. Chief of Staff)	Scott Keller (attorney)			Attorney Client; Work Product	Confidential communication between Darrell Davila and attorney, made for the purpose of facilitating the rendition of legal advice in connection with redistricting legislation.	
DOC_0012554	Lieutenant Governor Dan Patrick	JPG			Darrell Davila (Lt. Gov. Chief of Staff)	Alix Morris (attorney) (Lt. Gov. Deputy General Counsel)			Legislative; Attorney Client; Work Product	Governor Patrick and/or his staff made for a legislative purpose and reflecting privileged information, including thoughts, opinions, and mental impressions. Additionally, the document reflects confidential legal advice provided by counsel and the thoughts and mental impressions of counsel.	**WITHHOLD.** LP2.
DOC_0356536	Mark Bell	PDF	JSA	3/25/2021					Legislative; Attorney Client	Confidential draft memorandum from TLC regarding legislative redistricting process, including preparation of draft proposals.	**WITHHOLD.** LP2.
DOC_0001864	Sean Opperman	MSG		10/8/2021	Sean Opperman (attorney); Anna Mackin (attorney)	Jared May (TLC)			Legislative; Attorney Client; Work Product	Confidential communication between Sean Opperman (attorney) and Texas legislators and/or legislative staff regarding redistricting legislation.	**WITHHOLD.** LP2.
DOC_0001865	Sean Opperman	PDF		10/8/2021					Legislative; Attorney Client; Work Product	Confidential analysis of draft redistricting legislation, and kept in Senator Huffman's files, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001866	Sean Opperman	PDF		10/8/2021					Legislative; Attorney Client; Work Product	Confidential analysis of draft redistricting legislation, and kept in Senator Huffman's files, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001867	Sean Opperman	PDF		10/8/2021					Legislative; Attorney Client; Work Product	Confidential analysis of draft redistricting legislation, and kept in Senator Huffman's files, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001868	Sean Opperman	PDF		10/8/2021					Legislative; Attorney Client; Work Product	Confidential analysis of draft redistricting legislation, and kept in Senator Huffman's files, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001869	Sean Opperman	PDF		10/8/2021					Legislative; Attorney Client; Work Product	Confidential analysis of draft redistricting legislation, and kept in Senator Huffman's files, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001878	Sean Opperman	MSG		2/5/2021		Chloe Johnson			Legislative; Attorney Client; Work Product	Senate Research Center regarding summaries of committee hearings and related proceedings, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001879	Sean Opperman	PDF	Kenneth Bryan (Senate Research Center)	2/1/2021					Legislative; Attorney Client; Work Product	Confidential Senate Research Center analysis of Senate Redistricting Committee hearing, sent to committee members, and kept in Senator Huffman's personal files for the purpose of considering redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0001880	Sean Opperman	PDF	Kenneth Bryan (Senate Research Center)	2/1/2021					Legislative; Attorney Client; Work Product	Senate Redistricting Committee hearing, sent to committee members, and kept in Senator Huffman's personal files for the purpose of considering redistricting legislation.	**WITHHOLD.** LP2.
DOC_0001881	Sean Opperman	PDF	Andrew Robison (Senate Research Center)	2/1/2021					Legislative; Attorney Client; Work Product	Senate Redistricting Committee hearing, sent to committee members, and kept in Senator Huffman's personal files for the purpose of considering redistricting legislation.	**WITHHOLD.** LP2.
DOC_0001882	Sean Opperman	PDF	Andrew Robison (Senate Research Center)	2/1/2021					Legislative; Attorney Client; Work Product	Senate Redistricting Committee hearing, sent to committee members, and kept in Senator Huffman's personal files for the purpose of considering redistricting legislation.	**WITHHOLD.** LP2.
DOC_0001883	Sean Opperman	PDF	Kenneth Bryan (Senate Research Center)	1/29/2021					Legislative; Attorney Client; Work Product	Senate Redistricting Committee hearing, sent to committee members, and kept in Senator Huffman's personal files for the purpose of considering redistricting legislation.	**WITHHOLD.** LP2.
DOC_0001885	Sean Opperman	PDF	Andrew Robison (Senate Research Center)	2/2/2021					Legislative; Attorney Client; Work Product	Senate Redistricting Committee hearing, sent to committee members, and kept in Senator Huffman's personal files for the purpose of considering redistricting legislation.	**WITHHOLD.** LP2.
DOC_0001886	Sean Opperman	PDF	Andrew Robison (Senate Research Center)	2/4/2021					Legislative; Attorney Client; Work Product	Senate Redistricting Committee hearing, sent to committee members, and kept in Senator Huffman's personal files for the purpose of considering redistricting legislation.	**WITHHOLD.** LP2.
DOC_0001887	Sean Opperman	PDF	Kenneth Bryan (Senate Research Center)	2/5/2021					Legislative; Attorney Client; Work Product	Senate Redistricting Committee hearing, sent to committee members, and kept in Senator Huffman's personal files for the purpose of considering redistricting legislation.	**WITHHOLD.** LP2.
DOC_0001888	Sean Opperman	MSG		2/22/2021	Chloe Johnson				Legislative; Attorney Client; Work Product	Senate Research Center regarding summaries of committee hearings and related proceedings, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001889	Sean Opperman	PDF	Kenneth Bryan (Senate Research Center)	2/22/2021					Legislative; Attorney Client; Work Product	Senate Redistricting Committee hearing, sent to committee members, and kept in Senator Huffman's personal files for the purpose of considering redistricting legislation.	**WITHHOLD.** LP2.
DOC_0001890	Sean Opperman	MSG		3/11/2021	Chloe Johnson				Legislative; Attorney Client; Work Product	Senate Research Center regarding summaries of committee hearings and related proceedings, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001891	Sean Opperman	PDF	Kenneth Bryan (Senate Research Center)	3/11/2021					Legislative; Attorney Client; Work Product	Senate Redistricting Committee hearing, sent to committee members, and kept in Senator Huffman's personal files for the purpose of considering redistricting legislation.	**WITHHOLD.** LP2.

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Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0001892	Sean Opperman	MSG		3/15/2021		Chloe Johnson			Legislative; Attorney Client; Work Product	Senate Research Center regarding summaries of committee hearings and related proceedings, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0002559	Senator Joan Huffman	PDF		4/13/2021	Lehotsky Keller	Senator Huffman			Legislative; Attorney Client	Confidential communication regarding legal representation in connection with redistricting legislation.	**WITHHOLD.** LP2.
DOC_0002560	Senator Joan Huffman	PDF		4/13/2021	Lehotsky Keller	Senator Huffman			Legislative; Attorney Client	Confidential communication regarding legal representation in connection with redistricting legislation.	**WITHHOLD.** LP2.
DOC_0002562	Senator Joan Huffman	PDF		7/22/2021	Senator Huffman	Lehostky Keller			Legislative; Attorney Client	Confidential document relating to legal services rendered in connection with redistricting legislation.	**WITHHOLD.** LP2.
DOC_0002563	Senator Joan Huffman	PDF		8/12/2021	Senator Huffman	Lehostky Keller			Legislative; Attorney Client	Confidential document relating to legal services rendered in connection with redistricting legislation.	**WITHHOLD.** LP2.
DOC_0002565	Senator Joan Huffman	PDF		8/5/2021	Senator Huffman	Lehostky Keller			Legislative; Attorney Client	Confidential document relating to legal services rendered in connection with redistricting legislation.	**WITHHOLD.** LP2.
DOC_0002566	Senator Joan Huffman	PDF		6/8/2021	Senator Huffman	Lehostky Keller			Legislative; Attorney Client	Confidential document relating to legal services rendered in connection with redistricting legislation.	**WITHHOLD.** LP2.
DOC_0002567	Senator Joan Huffman	PDF		8/12/2021	Senator Huffman	Lehostky Keller			Legislative; Attorney Client	Confidential document relating to legal services rendered in connection with redistricting legislation.	**WITHHOLD.** LP2.
DOC_0002568	Senator Joan Huffman	PDF		8/5/2021	Senator Huffman	Lehostky Keller			Legislative; Attorney Client	Confidential document relating to legal services rendered in connection with redistricting legislation.	**WITHHOLD.** LP2.
DOC_0002577	Senator Joan Huffman	PDF		3/26/2021	Members of the 87th Legislature	Jeff Archer (TLC)			Legislative; Attorney Client	Confidential communication from Jeff Archer (TLC) to members of the Legislature regarding RedAppl.	**WITHHOLD.** LP2.
DOC_0002578	Senator Joan Huffman	PDF		3/26/2021	Members of the 87th Legislature	Jeff Archer (TLC)			Legislative; Attorney Client	Confidential communication from Jeff Archer (TLC) to members of the Legislature regarding RedAppl.	**WITHHOLD.** LP2.
DOC_0351699	Adam Foltz	MSG		10/10/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client; Work Product	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351700	Adam Foltz	MSG		10/8/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client; Work Product	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351701	Adam Foltz	MSG		10/8/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client; Work Product	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351702	Adam Foltz	MSG		10/7/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client; Work Product	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351704	Adam Foltz	MSG		10/5/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client; Work Product	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351707	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client; Work Product	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351711	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client; Work Product	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351713	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client; Work Product	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351715	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client; Work Product	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351719	Adam Foltz	MSG		10/4/2021	Edward Jaax; Adam Foltz	Colleen Garcia			Legislative; Attorney Client; Work Product	Confidential communication to House committee clerk and other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351720	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client; Work Product	Confidential communication to House committee clerk and other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.

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DOC_0351722	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client; Work Product	Confidential communication to House committee clerk and other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351726	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client; Work Product	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351730	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client; Work Product	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351732	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client; Work Product	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351734	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client; Work Product	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351736	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client; Work Product	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351738	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client; Work Product	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351740	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client; Work Product	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351744	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client; Work Product	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351747	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client; Work Product	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351751	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client; Work Product	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351752	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client; Work Product	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351753	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client; Work Product	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351757	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client; Work Product	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351764	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client; Work Product	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351768	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client; Work Product	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351772	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client; Work Product	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351774	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client; Work Product	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351776	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client; Work Product	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351778	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client; Work Product	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351782	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client; Work Product	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351784	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client; Work Product	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351786	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client; Work Product	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351788	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client; Work Product	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351790	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client; Work Product	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351792	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client; Work Product	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351794	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client; Work Product	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351796	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client; Work Product	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351801	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client; Work Product	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351803	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client; Work Product	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0351804	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client; Work Product	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351806	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client; Work Product	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351808	Adam Foltz	MSG		10/4/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client; Work Product	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351810	Adam Foltz	MSG		10/3/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client; Work Product	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351812	Adam Foltz	MSG		9/29/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client; Work Product	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351815	Adam Foltz	MSG		9/27/2021	Adam Foltz	Colleen Garcia			Legislative; Attorney Client; Work Product	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0351820	Adam Foltz	MSG		10/12/2021	Sharon Carter; Adam Foltz; Colleen Garcia; Todd Hunter	Margo Cardwell (attorney)			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, as well as other legislative staff, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352028	Adam Foltz	MSG		9/30/2021	Tommie Cardin (attorney); Parker Berry (attorney); Scott Field (attorney)	Adam Foltz			Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352073	Adam Foltz	MSG		10/8/2021	Margo Cardwell (attorney)	Adam Foltz	Scott Field (attorney)		Legislative; Attorney Client; Work Product	Confidential communication to counsel retained to advise on legality of redistricting legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352074	Adam Foltz	MSG		10/12/2021	Colleen Garcia	Adam Foltz			Legislative; Attorney Client; Work Product	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352075	Adam Foltz	MSG		10/4/2021	Colleen Garcia	Adam Foltz			Legislative; Attorney Client; Work Product	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352076	Adam Foltz	MSG		10/3/2021	Colleen Garcia	Adam Foltz			Legislative; Attorney Client; Work Product	Confidential communication to House committee clerk, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352096	Adam Foltz	MSG		10/15/2021	Adam Foltz	Jared May (TLC)			Legislative; Attorney Client; Work Product	Confidential communication to Texas Legislative Council staff relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352097	Adam Foltz	MSG		10/15/2021	Adam Foltz	Jared May (TLC)			Legislative; Attorney Client; Work Product	Confidential communication to Texas Legislative Council staff relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352098	Adam Foltz	MSG		10/14/2021	Adam Foltz	Jared May (TLC)			Legislative; Attorney Client; Work Product	Confidential communication to Texas Legislative Council staff relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352106	Adam Foltz	MSG		10/2/2021	Adam Foltz	Jared May (TLC)			Legislative; Attorney Client; Work Product	Confidential communication to Texas Legislative Council staff relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352107	Adam Foltz	MSG		9/29/2021	Adam Foltz	Jared May (TLC)			Legislative; Attorney Client; Work Product	Confidential communication to Texas Legislative Council staff relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352108	Adam Foltz	MSG		9/25/2021	Adam Foltz	Jared May (TLC)			Legislative; Attorney Client; Work Product	Confidential communication to Texas Legislative Council staff relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352109	Adam Foltz	MSG		9/28/2021	Victoria Smith; Adam Foltz	Rita Pantillion (TLC)			Legislative; Attorney Client; Work Product	Confidential communication to Texas Legislative Council staff relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352110	Adam Foltz	MSG		10/4/2021	Adam Foltz	Trey Burke			Legislative; Attorney Client; Work Product	Confidential communication to Texas Legislative Council staff relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352122	Adam Foltz	MSG		10/15/2021	Jared May (TLC)	Adam Foltz			Legislative; Attorney Client; Work Product	Confidential communication to Texas Legislative Council staff relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352123	Adam Foltz	MSG		10/14/2021	Jared May (TLC)	Adam Foltz			Legislative; Attorney Client; Work Product	Confidential communication to Texas Legislative Council staff relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352124	Adam Foltz	MSG		10/2/2021	Jared May (TLC)	Adam Foltz			Legislative; Attorney Client; Work Product	Confidential communication to Texas Legislative Council staff relating to draft redistricting proposal.	**WITHHOLD.** LP2.

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DOC_0352125	Adam Foltz	MSG		9/29/2021	Jared May (TLC)	Adam Foltz			Legislative; Attorney Client; Work Product	Confidential communication to Texas Legislative Council staff relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352126	Adam Foltz	MSG		9/25/2021	Jared May (TLC)	Adam Foltz			Legislative; Attorney Client; Work Product	Confidential communication to Texas Legislative Council staff relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0352306	Adam Foltz	PDF							Legislative; Attorney Client; Work Product	Confidential document relating to retention of counsel for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
DOC_0352307	Adam Foltz	PDF							Legislative; Attorney Client; Work Product	Confidential document relating to retention of counsel for the purpose of advising on the legality of redistricting legislation.	**WITHHOLD.** LP2.
PDOC_004009	Adam Foltz			9/15/2021	Members of the House Redistricting Committee	Jeff Archer (TLC)			Legislative; Attorney Client; Work Product	Confidential communication from TLC to members of the House Redistricting Committee relating to the use of RedAppl.	**WITHHOLD.** LP2.
DOC_0000101	Anna Mackin	DOCX		8/27/2021					Legislative; Attorney Client; Work Product	Confidential draft retention contract for use in connection with redistricting legislation.	**WITHHOLD.** LP2.
DOC_0000117	Anna Mackin	PDF		8/12/2021					Legislative; Attorney Client; Work Product	Confidential invoice for legal services provided in connection with redistricting legislation, given to Senate Redistricting Committee staff.	**WITHHOLD.** LP2.
DOC_0000118	Anna Mackin	PDF		10/7/2021					Legislative; Attorney Client; Work Product	Confidential invoice for legal services provided in connection with redistricting legislation, given to Senate Redistricting Committee staff.	**WITHHOLD.** LP2.
DOC_0000129	Anna Mackin	PDF		9/14/2021					Legislative; Attorney Client; Work Product	Confidential draft retention contract for use in connection with redistricting legislation.	**WITHHOLD.** LP2.
DOC_0000217	Anna Mackin	PDF		9/8/2021					Legislative; Attorney Client; Work Product	Confidential draft retention contract for use in connection with redistricting legislation.	**WITHHOLD.** LP2.
DOC_0000974	Anna Mackin	DOCX	Sean Opperman (attorney)	1/17/2021					Legislative; Attorney Client; Work Product	regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0001538	Anna Mackin	MSG		10/8/2021	Sean Opperman (attorney); Anna Mackin (attorney)	Jared May (TLC)			Legislative; Attorney Client; Work Product	redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0012513	Lieutenant Governor Dan Patrick	PNG			Darrell Davila (Lt. Gov. Chief of Staff)	Scott Keller (attorney)			Attorney Client; Work Product	Confidential communication between Darrell Davila and attorney, made for the purpose of facilitating the rendition of legal advice in connection with redistricting legislation.	
DOC_0356536	Mark Bell	PDF	JSA	3/25/2021					Legislative; Attorney Client; Work Product	Confidential draft memorandum from TLC regarding legislative redistricting process, including preparation of draft proposals.	**WITHHOLD.** LP2.
DOC_0001884	Sean Opperman	MSG		2/5/2021		Chloe Johnson			Legislative; Attorney Client; Work Product	Senate Research Center regarding summaries of committee hearings and related proceedings, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0002559	Senator Joan Huffman	PDF		4/13/2021	Lehotsky Keller	Senator Huffman			Legislative; Attorney Client; Work Product	Confidential communication regarding legal representation in connection with redistricting legislation.	**WITHHOLD.** LP2.
DOC_0002560	Senator Joan Huffman	PDF		4/13/2021	Lehotsky Keller	Senator Huffman			Legislative; Attorney Client; Work Product	Confidential communication regarding legal representation in connection with redistricting legislation.	**WITHHOLD.** LP2.
DOC_0002562	Senator Joan Huffman	PDF		7/22/2021	Senator Huffman	Lehostky Keller			Legislative; Attorney Client; Work Product	Confidential document relating to legal services rendered in connection with redistricting legislation.	**WITHHOLD.** LP2.

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Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0002563	Senator Joan Huffman	PDF		8/12/2021	Senator Huffman	Lehostky Keller			Legislative; Attorney Client; Work Product	Confidential document relating to legal services rendered in connection with redistricting legislation.	**WITHHOLD.** LP2.
DOC_0002564	Senator Joan Huffman	PDF		10/7/2021	Senator Huffman	Lehostky Keller			Legislative; Attorney Client; Work Product	Confidential document relating to legal services rendered in connection with redistricting legislation.	**WITHHOLD.** LP2.
DOC_0002565	Senator Joan Huffman	PDF		8/5/2021	Senator Huffman	Lehostky Keller			Legislative; Attorney Client; Work Product	Confidential document relating to legal services rendered in connection with redistricting legislation.	**WITHHOLD.** LP2.
DOC_0002566	Senator Joan Huffman	PDF		6/8/2021	Senator Huffman	Lehostky Keller			Legislative; Attorney Client; Work Product	Confidential document relating to legal services rendered in connection with redistricting legislation.	**WITHHOLD.** LP2.
DOC_0002567	Senator Joan Huffman	PDF		8/12/2021	Senator Huffman	Lehostky Keller			Legislative; Attorney Client; Work Product	Confidential document relating to legal services rendered in connection with redistricting legislation.	**WITHHOLD.** LP2.
DOC_0002568	Senator Joan Huffman	PDF		8/5/2021	Senator Huffman	Lehostky Keller			Legislative; Attorney Client; Work Product	Confidential document relating to legal services rendered in connection with redistricting legislation.	**WITHHOLD.** LP2.
DOC_0002577	Senator Joan Huffman	PDF		3/26/2021	Members of the 87th Legislature	Jeff Archer (TLC)			Legislative; Attorney Client; Work Product	Confidential communication from Jeff Archer (TLC) to members of the Legislature regarding RedAppl.	**WITHHOLD.** LP2.
DOC_0002578	Senator Joan Huffman	PDF		3/26/2021	Members of the 87th Legislature	Jeff Archer (TLC)			Legislative; Attorney Client; Work Product	Confidential communication from Jeff Archer (TLC) to members of the Legislature regarding RedAppl.	**WITHHOLD.** LP2.
DOC_0006639	Senator Joan Huffman	DOCX	Koy Kunkel	1/27/2021					Legislative; Attorney Client; Work Product	Confidential notes relating to Senate Redistricting Committee hearings, prepared for Senator Huffman by her attorneys.	**WITHHOLD.** LP2.
DOC_0352069	Adam Foltz	MSG		10/4/2021	Parker Berry (attorney)	Adam Foltz			Legislative; Attorney Client	Confidential communication to counsel retained to advise on legality of redistricting legislation, relating to draft redistricting proposal.	**WITHHOLD.** LP2.
DOC_0000105	Anna Mackin	DOCX	Casey Contres (Congressman Tony Gonzales former chief of staff)	10/1/2021					Legislative	Talking points for Senate Redistricting Committee hearing, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0000175	Anna Mackin	PDF	Alelhie Lila Valencia (Texas Demographic Center)	2/5/2021					Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001268	Anna Mackin	MSG		8/27/2021	Gardner Pate; Jeff Oldham (attorney); Courtney Hjaltman; Angela Colmenero (attorney)	Sean Opperman (attorney)	Anna Mackin (attorney)		Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001271	Anna Mackin	MSG		8/30/2021	Gardner Pate; Jeff Oldham (attorney); Courtney Hjaltman; Angela Colmenero (attorney)	Sean Opperman (attorney)	Anna Mackin (attorney)		Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001283	Anna Mackin	MSG		9/8/2021	Anna Mackin (attorney)	Brad Lockerbie (consultant)			Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001285	Anna Mackin	MSG		9/8/2021	Anna Mackin (attorney)	Brad Lockerbie (consultant)			Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0012277	Lieutenant Governor Dan Patrick	PDF	James Whitehorne	4/1/2021					Legislative	between Lieutenant Governor Patrick staffers regarding redistricting data, made for a legislative purpose and reflecting privileged information, including thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.

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DOC_0012522	Lieutenant Governor Dan Patrick	JPG			Darrell Davila (Lt. Gov. Chief of Staff)	Luis Saenz (Gov. Abbott Chief of Staff)			Legislative	Confidential communication between Darrell Davila and Luis Saenz regarding redistricting, reflecting legislative thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
PDOC_002935	Lieutenant Governor Dan Patrick								Legislative	Governor Patrick and other legislators regarding draft redistricting legislation, made for a legislative purpose and reflecting privileged information, including thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0356699	Representative Brooks Landgraf	PDF	State of Texas	10/4/2021					Legislative	Confidential document relating to draft redistricting legislation for House districts.	**WITHHOLD.** LP2.
DOC_0356716	Representative Brooks Landgraf	PDF	State of Texas	10/3/2021					Legislative	Confidential document relating to draft redistricting legislation for House districts.	**WITHHOLD.** LP2.
DOC_0014620	Representative Geanie Morrison	PDF		9/14/2021	Colleen Garcia (House Redistricting Committee Clerk)	Lloyd Potter (State demographer)			Legislative	Demographer to Colleen Garcia regarding House Redistricting Committee hearing, and kept in the files of Representative Morrison reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0014621	Representative Geanie Morrison	PDF		7/8/2021	Colleen Garcia (House Redistricting Committee Clerk)	Lloyd Potter (State demographer)			Legislative	Demographer to Colleen Garcia regarding House Redistricting Committee hearing, and kept in the files of Representative Morrison reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0352802	Representative Jacey Jetton	PDF	Tori Macfarlan						Legislative	Communications received from members of the public regarding redistricting, with internal notes.	**WITHHOLD.** LP2.
DOC_0352803	Representative Jacey Jetton	XLSX	Tori Macfarlan						Legislative	Communications received from members of the public regarding redistricting, with internal notes.	**WITHHOLD.** LP2.
DOC_0352804	Representative Jacey Jetton	PDF	Tori Macfarlan						Legislative	Communications received from members of the public regarding redistricting, with internal notes.	**WITHHOLD.** LP2.
DOC_0352805	Representative Jacey Jetton	XLSX	Tori Macfarlan						Legislative	Communications received from members of the public regarding redistricting, with internal notes.	**WITHHOLD.** LP2.
DOC_0352806	Representative Jacey Jetton	PDF	Tori Macfarlan						Legislative	Communications received from members of the public regarding redistricting, with internal notes.	**WITHHOLD.** LP2.
DOC_0352807	Representative Jacey Jetton	XLSX	Tori Macfarlan						Legislative	Communications received from members of the public regarding redistricting, with internal notes.	**WITHHOLD.** LP2.
DOC_0352853	Representative Jacey Jetton	PDF	torim		Lewis Luckenbach	Representative Jetton			Legislative	Confidential communication regarding draft redistricting legislation.	**WITHHOLD.** LP1.
DOC_0356612	Representative Ken King	PDF			George Briant (Hemphill county judge)	Cheryl Lively (Rep. King chief of staff)			Legislative	Documents and confidential communications related to draft redistricting legislation for Texas House districts.	**WITHHOLD.** LP2.
DOC_0011967	Representative Philip Cortez	PDF			Christian Anderson (consultant)	Hannah Reinhard (Rep. Cortez Legislative Director)			Legislative	Representative Cortez and/or his staff regarding draft redistricting legislation, reflecting privileged information, including thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0011969	Representative Philip Cortez	PDF			Christian Anderson (consultant); Rep. Phillip Cortez; Jorge Urby (consultant)	Hannah Reinhard (Rep. Cortez Legislative Director)			Legislative	Representative Cortez and/or his staff regarding draft redistricting legislation, reflecting privileged information, including thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0011970	Representative Philip Cortez	PDF			Christian Anderson (consultant); Rep. Phillip Cortez; Jorge Urby (consultant)	Hannah Reinhard (Rep. Cortez Legislative Director)			Legislative	Representative Cortez and/or his staff regarding draft redistricting legislation, reflecting privileged information, including thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0011971	Representative Philip Cortez	PDF			Christian Anderson (consultant); Rep. Phillip Cortez; Jorge Urby (consultant)	Hannah Reinhard (Rep. Cortez Legislative Director)			Legislative	Representative Cortez and/or his staff regarding draft redistricting legislation, reflecting privileged information, including thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0011973	Representative Philip Cortez	PDF			Christian Anderson (consultant)	Hannah Reinhard (Rep. Cortez Legislative Director)			Legislative	Representative Cortez and/or his staff regarding draft redistricting legislation, reflecting privileged information, including thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0011974	Representative Philip Cortez	PDF			Christian Anderson (consultant)	Hannah Reinhard (Rep. Cortez Legislative Director)			Legislative	Representative Cortez and/or his staff regarding draft redistricting legislation, reflecting privileged information, including thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0011975	Representative Philip Cortez	PDF			Christian Anderson (consultant)	Hannah Reinhard (Rep. Cortez Legislative Director)			Legislative	Representative Cortez and/or his staff regarding draft redistricting legislation, reflecting privileged information, including thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0011976	Representative Philip Cortez	PDF			Christian Anderson (consultant); Jorge Urby (consultant)	Hannah Reinhard (Rep. Cortez Legislative Director)			Legislative	Representative Cortez and/or his staff regarding draft redistricting legislation, reflecting privileged information, including thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0011977	Representative Philip Cortez	PDF			Christian Anderson (consultant)	Hannah Reinhard (Rep. Cortez Legislative Director)			Legislative	Representative Cortez and/or his staff regarding draft redistricting legislation, reflecting privileged information, including thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0011978	Representative Philip Cortez	PDF			Christian Anderson (consultant); Jorge Urby (consultant)	Hannah Reinhard (Rep. Cortez Legislative Director)			Legislative	Representative Cortez and/or his staff regarding draft redistricting legislation, reflecting privileged information, including thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0011981	Representative Philip Cortez	PDF			Christian Anderson (consultant); Rep. Phillip Cortez; Jorge Urby (consultant)	Hannah Reinhard (Rep. Cortez Legislative Director)			Legislative	Representative Cortez and/or his staff regarding draft redistricting legislation, reflecting privileged information, including thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0011984	Representative Philip Cortez	PDF			Christian Anderson (consultant)	Hannah Reinhard (Rep. Cortez Legislative Director)			Legislative	Representative Cortez and/or his staff regarding draft redistricting legislation, reflecting privileged information, including thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0011985	Representative Philip Cortez	PDF			Christian Anderson (consultant); Jorge Urby (consultant); Hannah Reinhard (Rep. Cortez Legislative Director)	Rep. Phillip Cortez			Legislative	Confidential communication between Representative Cortez and/or his staff regarding draft redistricting legislation, reflecting privileged information, including thoughts, opinions, and mental impressions.	**WITHHOLD.** LP1.
DOC_0011987	Representative Philip Cortez	PDF			Christian Anderson (consultant)	Hannah Reinhard (Rep. Cortez Legislative Director)			Legislative	Representative Cortez and/or his staff regarding draft redistricting legislation, reflecting privileged information, including thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0011988	Representative Philip Cortez	PDF			Christian Anderson (consultant); Rep. Phillip Cortez; Jorge Urby (consultant)	Hannah Reinhard (Rep. Cortez Legislative Director)			Legislative	Representative Cortez and/or his staff regarding draft redistricting legislation, reflecting privileged information, including thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.

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Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0011989	Representative Philip Cortez	PDF			Christian Anderson (consultant); Rep. Phillip Cortez; Jorge Urby (consultant)	Hannah Reinhard (Rep. Cortez Legislative Director)			Legislative	Representative Cortez and/or his staff regarding draft redistricting legislation, reflecting privileged information, including thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0011990	Representative Philip Cortez	PDF			Christian Anderson (consultant); Rep. Phillip Cortez; Jorge Urby (consultant)	Hannah Reinhard (Rep. Cortez Legislative Director)			Legislative	Representative Cortez and/or his staff regarding draft redistricting legislation, reflecting privileged information, including thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0011991	Representative Philip Cortez	PDF			Christian Anderson (consultant)	Hannah Reinhard (Rep. Cortez Legislative Director)			Legislative	Representative Cortez and/or his staff regarding draft redistricting legislation, reflecting privileged information, including thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0011992	Representative Philip Cortez	PDF			Christian Anderson (consultant); Jorge Urby (consultant)	Hannah Reinhard (Rep. Cortez Legislative Director)			Legislative	Representative Cortez and/or his staff regarding draft redistricting legislation, reflecting privileged information, including thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0011993	Representative Philip Cortez	PDF			Christian Anderson (consultant); Rep. Phillip Cortez; Jorge Urby (consultant)	Hannah Reinhard (Rep. Cortez Legislative Director)			Legislative	Representative Cortez and/or his staff regarding draft redistricting legislation, reflecting privileged information, including thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0011994	Representative Philip Cortez	PDF			Christian Anderson (consultant); Rep. Phillip Cortez; Jorge Urby (consultant)	Hannah Reinhard (Rep. Cortez Legislative Director)			Legislative	Representative Cortez and/or his staff regarding draft redistricting legislation, reflecting privileged information, including thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0011996	Representative Philip Cortez	PDF			Christian Anderson (consultant); Rep. Phillip Cortez; Jorge Urby (consultant)	Hannah Reinhard (Rep. Cortez Legislative Director)			Legislative	Representative Cortez and/or his staff regarding draft redistricting legislation, reflecting privileged information, including thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0011997	Representative Philip Cortez	PDF			Christian Anderson (consultant); Rep. Phillip Cortez; Jorge Urby (consultant)	Hannah Reinhard (Rep. Cortez Legislative Director)			Legislative	Representative Cortez and/or his staff regarding draft redistricting legislation, reflecting privileged information, including thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0011998	Representative Philip Cortez	PDF			Christian Anderson (consultant); Rep. Phillip Cortez; Jorge Urby (consultant)	Hannah Reinhard (Rep. Cortez Legislative Director)			Legislative	Representative Cortez and/or his staff regarding draft redistricting legislation, reflecting privileged information, including thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0011999	Representative Philip Cortez	PDF			Christian Anderson (consultant)	Hannah Reinhard (Rep. Cortez Legislative Director)			Legislative	Representative Cortez and/or his staff regarding draft redistricting legislation, reflecting privileged information, including thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0012000	Representative Philip Cortez	PDF			Christian Anderson (consultant); Rep. Phillip Cortez; Jorge Urby (consultant)	Hannah Reinhard (Rep. Cortez Legislative Director)			Legislative	Representative Cortez and/or his staff regarding draft redistricting legislation, reflecting privileged information, including thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0012002	Representative Philip Cortez	PDF			Christian Anderson (consultant)	Hannah Reinhard (Rep. Cortez Legislative Director)			Legislative	Representative Cortez and/or his staff regarding draft redistricting legislation, reflecting privileged information, including thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0012003	Representative Philip Cortez	PDF			Christian Anderson (consultant)	Hannah Reinhard (Rep. Cortez Legislative Director)			Legislative	Representative Cortez and/or his staff regarding draft redistricting legislation, reflecting privileged information, including thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0012005	Representative Philip Cortez	PDF			Christian Anderson (consultant)	Hannah Reinhard (Rep. Cortez Legislative Director)			Legislative	Representative Cortez and/or his staff regarding draft redistricting legislation, reflecting privileged information, including thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0012006	Representative Philip Cortez	PDF			Christian Anderson (consultant); Rep. Phillip Cortez; Jorge Urby (consultant)	Hannah Reinhard (Rep. Cortez Legislative Director)			Legislative	Representative Cortez and/or his staff regarding draft redistricting legislation, reflecting privileged information, including thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0012007	Representative Philip Cortez	PDF			Christian Anderson (consultant)	Hannah Reinhard (Rep. Cortez Legislative Director)			Legislative	Representative Cortez and/or his staff regarding draft redistricting legislation, reflecting privileged information, including thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0012008	Representative Philip Cortez	PDF			Christian Anderson (consultant)	Hannah Reinhard (Rep. Cortez Legislative Director)			Legislative	Representative Cortez and/or his staff regarding draft redistricting legislation, reflecting privileged information, including thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0012009	Representative Philip Cortez	PDF			Christian Anderson (consultant); Rep. Phillip Cortez; Jorge Urby (consultant)	Hannah Reinhard (Rep. Cortez Legislative Director)			Legislative	Representative Cortez and/or his staff regarding draft redistricting legislation, reflecting privileged information, including thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0012010	Representative Philip Cortez	PDF			Christian Anderson (consultant); Rep. Phillip Cortez; Jorge Urby (consultant)	Hannah Reinhard (Rep. Cortez Legislative Director)			Legislative	Representative Cortez and/or his staff regarding draft redistricting legislation, reflecting privileged information, including thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0012011	Representative Philip Cortez	PDF			Christian Anderson (consultant)	Hannah Reinhard (Rep. Cortez Legislative Director)			Legislative	Representative Cortez and/or his staff regarding draft redistricting legislation, reflecting privileged information, including thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0012027	Representative Philip Cortez	PDF			Hannah Reinhard (Rep. Cortez Legislative Director)	Christian Anderson (consultant)			Legislative	Representative Cortez and/or his staff regarding draft redistricting legislation, reflecting privileged information, including thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
PDOC_002004	Representative Todd Hunter				Representative Todd Hunter	Congresswoman Eddie Bernice Johnson			Legislative	Confidential letter from Congresswoman Eddie Bernice Johnson to Chairman Hunter regarding redistricting legislation.	**WITHHOLD.** LP2.
PDOC_002078	Representative Todd Hunter				Representative Todd Hunter	Congresswoman Shiela Jackson-Lee			Legislative	Confidential letter from Congresswoman Shiela Jackson-Lee to Chairman Hunter regarding redistricting legislation.	**WITHHOLD.** LP2.
DOC_0001717	Sean Opperman	MSG		2/5/2021	Sean Opperman (attorney)	Lloyd Potter	Alelhie Lila Valencia		Legislative	Confidential communication between Sean Opperman (attorney) and Texas legislators and/or legislative staff regarding redistricting legislation.	**WITHHOLD.** LP2.

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Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0001718	Sean Opperman	XLSX		2/11/2011	Senator Joan Huffman	State Demographer Lloyd Potter			Legislative	from State Demographer Lloyd Potter to Senator Huffman, kept for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001719	Sean Opperman	PDF		2/5/2021	Senator Joan Huffman	State Demographer Lloyd Potter			Legislative	from State Demographer Lloyd Potter to Senator Huffman, kept for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001720	Sean Opperman	PDF	Lloyd Potter	2/5/2021	Senator Huffman	State Demographer Lloyd Potter			Legislative	from State Demographer Lloyd Potter to Senator Huffman, kept for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001732	Sean Opperman	MSG		3/12/2021	Sean Opperman (attorney)	Lloyd Potter	Santiago Diaz; TDC (Texas Demographic Center)		Legislative	Confidential communication between Sean Opperman (attorney) and Texas legislators and/or legislative staff regarding redistricting legislation.	**WITHHOLD.** LP2.
DOC_0001734	Sean Opperman	MSG		3/12/2021	Sean Opperman (attorney)	Lloyd Potter	Cesar Blanco; TDC (Texas Demographic Center)		Legislative	Confidential communication between Sean Opperman (attorney) and Texas legislators and/or legislative staff regarding redistricting legislation.	**WITHHOLD.** LP2.
DOC_0001735	Sean Opperman	DOCX	Santiago Diaz (Senator Miles legislative director)	3/12/2021	Senator Huffman	State Demographer Lloyd Potter			Legislative	from State Demographer Lloyd Potter to Senator Huffman, kept for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001792	Sean Opperman	MSG		9/21/2021	Anna Mackin (attorney); Sean Opperman (attorney)	Chris Gober			Legislative	Confidential communication between Sean Opperman (attorney) and Texas legislators and/or legislative staff regarding redistricting legislation.	**WITHHOLD.** LP2.
DOC_0002411	Senator Joan Huffman	PPTX	Alelhie Lila Valencia	6/30/2016					Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP2.
DOC_0002450	Senator Joan Huffman	PPTX	Alelhie Lila Valencia	6/30/2016					Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP2.
DOC_0003039	Senator Joan Huffman	PDF	Lloyd Potter	2/5/2021	Senate Redistricting Committee	Senator Huffman			Legislative	Confidential communication from Senator Huffman to members of the Senate Redistricting Committee regarding committee meetings and related documents.	**WITHHOLD.** LP1.
DOC_0003053	Senator Joan Huffman	PDF	Alelhie Lila Valencia	1/23/2021	Senate Redistricting Committee	Senator Huffman			Legislative	Confidential communication from Senator Huffman to members of the Senate Redistricting Committee regarding upcoming committee hearings.	**WITHHOLD.** LP1.
DOC_0006853	Senator Joan Huffman	PDF		10/5/2021	Senate Redistricting Committee	Congresswoman Sheila Jackson Lee and Comgressman Al Green			Legislative	Confidential communication from Congresswoman Sheila Jackson Lee and Congressman Al Green to members of the Senate Redistricting Committee regarding draft redistricting legislation.	**WITHHOLD.** LP2.
DOC_0006905	Senator Joan Huffman	PDF	Lloyd Potter	2/5/2021					Legislative	Confidential documents and attachments relating to Senate Redistricting Committee hearings.	**WITHHOLD.** LP2.
DOC_0006907	Senator Joan Huffman	PDF	Alelhie Lila Valencia	2/5/2021					Legislative	Confidential documents and attachments relating to Senate Redistricting Committee hearings.	**WITHHOLD.** LP2.

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Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0001659	Sean Opperman	MSG		12/8/2020	Lane; Angus Lupton; Anna Barnett; Cari Christman; Carrie Smith; Chris Steinbach; Cody Terry; Dave Nelson; Deisy Jaimes; Drew Graham; Garry Jones; Ginny Bell; Harold Stone; Johanna Kim; Jorge Ramirez; Lajuana D. Barton; Lara Wendler; Louie Sanchez; Luis Moreno; Marc Salvato; Matthew Dowling; Peter Einhorn; Randy Samuelson; Robert Borja; Shannan Sorrell; Stacey Chamberlin; Sushma Smith;	Sean Opperman (attorney)			Legislative; Deliberative	Confidential communication between Sean Opperman (attorney) and Texas legislators and/or legislative staff regarding redistricting legislation.	**WITHHOLD.** LP2.
DOC_0012132	Lieutenant Governor Dan Patrick	PDF	Alexandra Lovell (Lt. Gov. Digital Director)	1/22/2021					Legislative	and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0012133	Lieutenant Governor Dan Patrick	PDF	Alexandra Lovell (Lt. Gov. Digital Director)	1/29/2021					Legislative	and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0012134	Lieutenant Governor Dan Patrick	PDF	Alexandra Lovell (Lt. Gov. Digital Director)	2/5/2021					Legislative	and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0012135	Lieutenant Governor Dan Patrick	PDF	Alexandra Lovell (Lt. Gov. Digital Director)	2/19/2021					Legislative	and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0012136	Lieutenant Governor Dan Patrick	PDF	Alexandra Lovell (Lt. Gov. Digital Director)	2/19/2021					Legislative	and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0012137	Lieutenant Governor Dan Patrick	PDF	Alexandra Lovell (Lt. Gov. Digital Director)	2/25/2021					Legislative	and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0012138	Lieutenant Governor Dan Patrick	PDF	Alexandra Lovell (Lt. Gov. Digital Director)	3/8/2021					Legislative	and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0012139	Lieutenant Governor Dan Patrick	DOCX	Alexandra Lovell (Lt. Gov. Digital Director)	3/11/2021					Legislative	and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0012140	Lieutenant Governor Dan Patrick	DOCX	Alexandra Lovell (Lt. Gov. Digital Director)	3/25/2021					Legislative	and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0012141	Lieutenant Governor Dan Patrick	PDF	Alexandra Lovell (Lt. Gov. Digital Director)	3/25/2021					Legislative	and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0012142	Lieutenant Governor Dan Patrick	PDF	Alexandra Lovell (Lt. Gov. Digital Director)	3/25/2021					Legislative	and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0012143	Lieutenant Governor Dan Patrick	DOCX	Alexandra Lovell (Lt. Gov. Digital Director)	3/30/2021					Legislative	and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0012144	Lieutenant Governor Dan Patrick	PDF	Alexandra Lovell (Lt. Gov. Digital Director)	3/31/2021					Legislative	and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0012145	Lieutenant Governor Dan Patrick	DOCX	Alexandra Lovell (Lt. Gov. Digital Director)	4/12/2021					Legislative	and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0012146	Lieutenant Governor Dan Patrick	PDF	Microsoft Office User	5/13/2021					Legislative	and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0012147	Lieutenant Governor Dan Patrick	DOCX	Microsoft Office User	4/20/2021					Legislative	and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0012148	Lieutenant Governor Dan Patrick	PDF	Microsoft Office User	4/19/2021					Legislative	and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0012149	Lieutenant Governor Dan Patrick	PDF	Microsoft Office User	4/29/2021					Legislative	and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0012152	Lieutenant Governor Dan Patrick	DOCX	Alexandra Lovell (Lt. Gov. Digital Director)	10/21/2019					Legislative	and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0012244	Lieutenant Governor Dan Patrick	DOCX	Steven Aranyi (Lt. Gov. Press Secretary)	10/8/2021					Legislative	Draft of public statement regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0356694	Representative Brooks Landgraf	DOCX							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0356705	Representative Brooks Landgraf	DOCX							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352812	Representative Jacey Jetton	DOCX	Jacey Jetton						Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP2.
DOC_0352817	Representative Jacey Jetton	DOCX	Jacey Jetton						Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP2.
DOC_0352827	Representative Jacey Jetton	DOCX	Jacey Jetton						Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP2.
DOC_0352829	Representative Jacey Jetton	DOCX	Jacey Jetton						Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP2.
DOC_0001976	Senator Joan Huffman	DOCX	Anna Mackin (attorney)	10/7/2021					Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP2.
DOC_0002001	Senator Joan Huffman	DOCX	Sarah Willcox	9/21/2021					Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP2.
DOC_0002004	Senator Joan Huffman	DOCX	Sarah Willcox	9/21/2021					Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP2.
DOC_0002351	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	2/28/2020					Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP2.
DOC_0002362	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/18/2021					Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP2.
DOC_0002363	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/7/2021					Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP2.
DOC_0002367	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/7/2021					Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0002374	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/18/2021					Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP2.
DOC_0002381	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/26/2021					Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP2.
DOC_0002390	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/27/2021					Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP2.
DOC_0002391	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/27/2021					Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP2.
DOC_0002399	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/28/2021					Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP2.
DOC_0002400	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/22/2021					Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP2.
DOC_0002405	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	2/12/2021					Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP2.
DOC_0002406	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	2/10/2021					Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP2.
DOC_0002415	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/22/2021					Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP2.
DOC_0002420	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	2/1/2021					Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP2.
DOC_0002421	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	2/1/2021					Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP2.
DOC_0002426	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	2/2/2021					Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP2.
DOC_0002427	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/22/2021					Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP2.
DOC_0002436	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	2/2/2021					Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP2.
DOC_0002437	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/22/2021					Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP2.
DOC_0002445	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	6/30/2016					Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP2.
DOC_0002446	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/22/2021					Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP2.
DOC_0002454	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	2/12/2021					Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP2.
DOC_0002455	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/22/2021					Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP2.
DOC_0002462	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	2/12/2021					Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP2.

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Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0002463	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/22/2021					Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP2.
DOC_0002488	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	10/7/2019					Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP2.
DOC_0002514	Senator Joan Huffman	XLSX	Sean Opperman (attorney)	1/24/2020					Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP2.
DOC_0002516	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/6/2020					Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP2.
DOC_0003086	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	9/21/2021					Legislative	Internal document relating Senator Huffman and her staff's response to media inquiries regarding the legislative redistricting process.	**WITHHOLD.** LP2.
DOC_0003087	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	9/29/2021					Legislative	Internal document relating Senator Huffman and her staff's response to media inquiries regarding the legislative redistricting process.	**WITHHOLD.** LP2.
DOC_0003088	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	10/29/2021					Legislative	Internal document relating Senator Huffman and her staff's response to media inquiries regarding the legislative redistricting process.	**WITHHOLD.** LP2.
DOC_0352895	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352896	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352897	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352898	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352899	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352900	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352901	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352902	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352904	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352905	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352906	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352928	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352929	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0352930	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352931	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352932	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352933	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352934	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352935	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352936	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352937	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352938	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352939	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352940	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352941	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352942	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352943	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352944	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352945	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352946	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352947	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352948	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352949	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0352950	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352951	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352952	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352953	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352954	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352955	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352956	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352958	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352959	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352960	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352961	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352962	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352963	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352964	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352965	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352966	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352967	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352968	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352969	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352970	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0352971	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352972	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352973	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352974	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352975	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352976	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352977	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352988	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352989	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352991	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352992	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352993	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352997	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0353010	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0353016	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0353017	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0353025	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0353026	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0353027	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0353029	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0353030	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0000001	Anna Mackin	PDF		11/16/2021					Legislative	between Ms. Mackin and various members of the Texas Legislature regarding the creation and design of the new electoral maps, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0000195	Anna Mackin	PDF		8/5/2021					Legislative	Confidential invoice for legal services provided in connection with redistricting legislation, given to Senate Redistricting Committee staff.	**WITHHOLD.** LP2.
DOC_0000210	Anna Mackin	DOCX		8/30/2021					Legislative	Calendar entries relating to redistricting, including hearings, and meetings with legislators and staffers	**WITHHOLD.** LP2.
DOC_0000218	Anna Mackin	PDF		9/8/2021					Legislative	Confidential draft retention contract for use in connection with redistricting legislation.	**WITHHOLD.** LP2.
DOC_0000219	Anna Mackin	PDF		9/13/2021					Legislative	Confidential draft retention contract for use in connection with redistricting legislation.	**WITHHOLD.** LP2.
DOC_0000220	Anna Mackin	DOCX		8/31/2021					Legislative	Confidential draft retention contract for use in connection with redistricting legislation.	**WITHHOLD.** LP2.
DOC_0001270	Anna Mackin	DOCX		8/26/2021					Legislative	Calendar entries relating to redistricting, including hearings, and meetings with legislators and staffers	**WITHHOLD.** LP2.
DOC_0001272	Anna Mackin	DOCX		8/30/2021					Legislative	Calendar entries relating to redistricting, including hearings, and meetings with legislators and staffers	**WITHHOLD.** LP2.
DOC_0001284	Anna Mackin	PDF		9/8/2021					Legislative	Confidential draft retention contract for use in connection with redistricting legislation.	**WITHHOLD.** LP2.
DOC_0001286	Anna Mackin	PDF		9/8/2021					Legislative	Confidential draft retention contract for use in connection with redistricting legislation.	**WITHHOLD.** LP2.
DOC_0001516	Anna Mackin	PDF		8/12/2021					Legislative	Confidential invoice for legal services provided in connection with redistricting legislation, given to Senate Redistricting Committee staff.	**WITHHOLD.** LP2.
DOC_0001517	Anna Mackin	PDF		8/5/2021					Legislative	Confidential invoice for legal services provided in connection with redistricting legislation, given to Senate Redistricting Committee staff.	**WITHHOLD.** LP2.
DOC_0001519	Anna Mackin	PDF		10/7/2021					Legislative	Confidential invoice for legal services provided in connection with redistricting legislation, given to Senate Redistricting Committee staff.	**WITHHOLD.** LP2.
DOC_0355664	Julia Rathgeber	PDF		1/5/2022	o0675AC				Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	**WITHHOLD.** LP2.
DOC_0355665	Julia Rathgeber	DOCX		9/14/2021	Julia Rathgeber				Legislative	Confidential draft document regarding to legislative redistricting process and related scheduling.	**WITHHOLD.** LP2.
DOC_0356658	Representative Brooks Landgraf	PDF		6/13/2021					Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	**WITHHOLD.** LP2.
DOC_0356659	Representative Brooks Landgraf	PDF		9/15/2021					Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	**WITHHOLD.** LP2.
DOC_0356660	Representative Brooks Landgraf	PDF		3/18/2021					Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	**WITHHOLD.** LP2.
DOC_0356661	Representative Brooks Landgraf	PDF		4/1/2021					Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	**WITHHOLD.** LP2.
DOC_0356662	Representative Brooks Landgraf	PDF		4/8/2021					Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	**WITHHOLD.** LP2.
DOC_0356663	Representative Brooks Landgraf	PDF		4/20/2021					Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	**WITHHOLD.** LP2.
DOC_0356664	Representative Brooks Landgraf	PDF		5/1/2021					Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	**WITHHOLD.** LP2.
DOC_0356665	Representative Brooks Landgraf	PDF		7/6/2021					Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0356666	Representative Brooks Landgraf	PDF		7/7/2021					Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	**WITHHOLD.** LP2.
DOC_0356668	Representative Brooks Landgraf	PDF		9/9/2021					Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	**WITHHOLD.** LP2.
DOC_0356669	Representative Brooks Landgraf	PDF		9/13/2021					Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	**WITHHOLD.** LP2.
DOC_0356670	Representative Brooks Landgraf	PDF		9/18/2021					Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	**WITHHOLD.** LP2.
DOC_0356671	Representative Brooks Landgraf	PDF		10/4/2021					Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	**WITHHOLD.** LP2.
DOC_0356672	Representative Brooks Landgraf	PDF		10/5/2021					Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	**WITHHOLD.** LP2.
DOC_0356673	Representative Brooks Landgraf	PDF		10/11/2021					Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	**WITHHOLD.** LP2.
DOC_0356674	Representative Brooks Landgraf	PDF		10/13/2021					Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	**WITHHOLD.** LP2.
DOC_0356675	Representative Brooks Landgraf	PDF		5/18/2021					Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	**WITHHOLD.** LP2.
DOC_0356676	Representative Brooks Landgraf	PDF		10/20/2021					Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	**WITHHOLD.** LP2.
DOC_0356677	Representative Brooks Landgraf	PDF		10/22/2021					Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	**WITHHOLD.** LP2.
DOC_0356678	Representative Brooks Landgraf	PDF		9/20/2021					Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	**WITHHOLD.** LP2.
DOC_0356679	Representative Brooks Landgraf	PDF		8/25/2021					Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	**WITHHOLD.** LP2.
DOC_0356680	Representative Brooks Landgraf	PDF		2/24/2021					Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	**WITHHOLD.** LP2.
DOC_0356681	Representative Brooks Landgraf	PDF		3/31/2021					Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	**WITHHOLD.** LP2.
DOC_0356686	Representative Brooks Landgraf	PDF		9/17/2021					Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	**WITHHOLD.** LP2.
PDOC_002220	Representative Geanie Morrison								Legislative	Redistricting Committee hearings, kept in Representative Morrison's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP1.
PDOC_001742	Representative Todd Hunter								Legislative	redistricting, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP1.
PDOC_001890	Representative Todd Hunter								Legislative; Attorney Client	performed at the direction of legislative members or at the direction of counsel, for legal services rendered in connection with redistricting legislation.	**WITHHOLD.** LP2.
DOC_0003016	Senator Joan Huffman	PDF	Catherine Colhoun	1/20/2021					Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	**WITHHOLD.** LP2.
PDOC_003927	Adam Foltz								Legislative	redistricting map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
PDOC_003930	Adam Foltz								Legislative	redistricting map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
PDOC_003936	Adam Foltz								Legislative	redistricting map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
PDOC_003940	Adam Foltz								Legislative	redistricting map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
PDOC_003965	Adam Foltz								Legislative	redistricting map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
PDOC_003970	Adam Foltz								Legislative	redistricting map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
PDOC_003974	Adam Foltz								Legislative	redistricting map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
PDOC_003976	Adam Foltz								Legislative	redistricting map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
PDOC_003978	Adam Foltz								Legislative	redistricting map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
PDOC_004000	Adam Foltz								Legislative	redistricting map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
PDOC_004008	Adam Foltz								Legislative	redistricting map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
PDOC_004011	Adam Foltz								Legislative	redistricting map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
PDOC_004013	Adam Foltz								Legislative	redistricting map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
PDOC_004018	Adam Foltz								Legislative	redistricting map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
PDOC_004022	Adam Foltz								Legislative	redistricting map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
PDOC_004024	Adam Foltz								Legislative	redistricting map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
PDOC_004039	Adam Foltz								Legislative	redistricting map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
PDOC_004040	Adam Foltz								Legislative	redistricting map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
PDOC_004042	Adam Foltz								Legislative	redistricting map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
PDOC_004050	Adam Foltz								Legislative	redistricting map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
PDOC_004075	Adam Foltz								Legislative	redistricting map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
PDOC_004266	Adam Foltz								Legislative	redistricting map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
PDOC_004268	Adam Foltz								Legislative	redistricting map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
PDOC_004269	Adam Foltz								Legislative	redistricting map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
PDOC_004271	Adam Foltz								Legislative	redistricting map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
PDOC_004275	Adam Foltz								Legislative	redistricting map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
PDOC_004304	Adam Foltz								Legislative	redistricting map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
PDOC_004311	Adam Foltz								Legislative	redistricting map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
PDOC_004370	Adam Foltz								Legislative	redistricting map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
PDOC_004375	Adam Foltz								Legislative	redistricting map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
PDOC_004379	Adam Foltz								Legislative	redistricting map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
PDOC_004386	Adam Foltz								Legislative	redistricting map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
PDOC_004390	Adam Foltz								Legislative	redistricting map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
PDOC_004395	Adam Foltz								Legislative	redistricting map proposal regarding redistricting for the Texas House, created, received, and/or gathered at Chairman Hunter's direction for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0000084	Anna Mackin	DOCX	Anna Mackin (attorney)	10/16/2021					Legislative	congressional districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	**WITHHOLD.** LP2.
DOC_0000133	Anna Mackin	PDF		10/7/2021					Legislative	congressional districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	**WITHHOLD.** LP2.
DOC_0000134	Anna Mackin	PDF		10/7/2021					Legislative	congressional districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	**WITHHOLD.** LP2.
DOC_0000135	Anna Mackin	PDF		10/7/2021					Legislative	congressional districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	**WITHHOLD.** LP2.
DOC_0000143	Anna Mackin	PDF		10/8/2021					Legislative	congressional districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	**WITHHOLD.** LP2.
DOC_0000144	Anna Mackin	PDF		10/8/2021					Legislative	congressional districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	**WITHHOLD.** LP2.
DOC_0000145	Anna Mackin	PDF		10/8/2021					Legislative	congressional districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	**WITHHOLD.** LP2.
DOC_0000146	Anna Mackin	PDF		10/8/2021					Legislative	congressional districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0000182	Anna Mackin	PDF		9/26/2021					Legislative	congressional districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	**WITHHOLD.** LP2.
DOC_0000183	Anna Mackin	PDF		9/30/2021					Legislative	congressional districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	**WITHHOLD.** LP2.
DOC_0000184	Anna Mackin	PDF		10/4/2021					Legislative	congressional districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	**WITHHOLD.** LP2.
DOC_0000197	Anna Mackin	PDF		9/27/2021					Legislative	congressional districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	**WITHHOLD.** LP2.
DOC_0000274	Anna Mackin	DOCX	Anna Mackin (attorney)	10/12/2021					Legislative	congressional districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	**WITHHOLD.** LP2.
DOC_0001358	Anna Mackin	PDF		9/26/2021					Legislative	congressional districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	**WITHHOLD.** LP2.
DOC_0001521	Anna Mackin	PDF		10/7/2021					Legislative	congressional districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	**WITHHOLD.** LP2.
DOC_0001522	Anna Mackin	PDF		10/7/2021					Legislative	congressional districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	**WITHHOLD.** LP2.
DOC_0001523	Anna Mackin	PDF		10/7/2021					Legislative	congressional districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	**WITHHOLD.** LP2.
DOC_0011862	Koy Kunkel	PDF		4/9/2020					Legislative	kept in Senator Huffman's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0011864	Koy Kunkel	XLSX		2/20/2015	KAG				Legislative	Data relating to draft redistricting legislation, kept in Senator Huffman's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0011865	Koy Kunkel	XLSX		2/20/2015	KAG				Legislative	Data relating to draft redistricting legislation, kept in Senator Huffman's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0011874	Koy Kunkel	XLSX		2/20/2015	KAG				Legislative	Data relating to draft redistricting legislation, kept in Senator Huffman's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0012163	Lieutenant Governor Dan Patrick	PDF		5/26/2017					Legislative	Data relating to draft redistricting legislation, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
N/A	Lieutenant Governor Dan Patrick								Legislative	RedAppl account, and within that account there data files relating to draft electoral maps. These RedAppl files reveal his thoughts, opinions, and mental impressions on draft redistricting legislation in the course of the redistricting process.	**WITHHOLD.** LP2.
PDOC_002955	Lieutenant Governor Dan Patrick								Legislative	Data relating to draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
PDOC_002956	Lieutenant Governor Dan Patrick								Legislative	Data relating to draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
PDOC_004473	Representative An drew Murr								Legislative	Data relating to redistricting legislation, kept in Representative Murr's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0356616	Representative Brooks Landgraf	PDF		8/22/2021					Legislative	Data relating to draft redistricting legislation for House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0356617	Representative Brooks Landgraf	PDF		8/23/2021					Legislative	Data relating to draft redistricting legislation for House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0356620	Representative Brooks Landgraf	PDF	ste955	3/17/2021					Legislative	Data relating to draft redistricting legislation for House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0356695	Representative Brooks Landgraf	XLSX							Legislative	Data relating to draft redistricting legislation for House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0356697	Representative Brooks Landgraf	XLSX							Legislative	Data relating to draft redistricting legislation for House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0356719	Representative Brooks Landgraf	PDF		9/29/2021					Legislative	Data relating to draft redistricting legislation for House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0356720	Representative Brooks Landgraf	PDF		10/5/2021					Legislative	Data relating to draft redistricting legislation for House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0356721	Representative Brooks Landgraf	PDF		10/5/2021					Legislative	Data relating to draft redistricting legislation for House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0356722	Representative Brooks Landgraf	PDF		10/5/2021					Legislative	Data relating to draft redistricting legislation for House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
PDOC_004650	Representative Brooks Landgraf								Legislative	Data and related materials relating to draft redistricting legislation for House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0014610	Representative Geanie Morrison	PDF		8/22/2021					Legislative	Draft redistricting legislation and related data, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0014611	Representative Geanie Morrison	PDF		8/23/2021					Legislative	Draft redistricting legislation and related data, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0014612	Representative Geanie Morrison	PDF		8/16/2021					Legislative	Draft redistricting legislation and related data, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0014625	Representative Geanie Morrison	PDF		10/8/2019					Legislative	Data related to draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0014626	Representative Geanie Morrison	PDF		10/1/2019					Legislative	Data related to draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
PDOC_002332	Representative Geanie Morrison								Legislative	Draft redistricting legislation and related data and notes, with Representative Morrison's annotations, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
PDOC_002367	Representative Geanie Morrison								Legislative	Draft redistricting legislation and related data and notes, with Representative Morrison's annotations, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
PDOC_002518	Representative Geanie Morrison								Legislative	Data relating to draft redistricting legislation, with Representative Morrison's annotations, reflecting and implicating legislative privileged thoughts, opinions, and mental	**WITHHOLD.** LP2.
PDOC_002581	Representative Geanie Morrison								Legislative	Draft redistricting legislation and related data and notes, with Representative Morrison's annotations, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
PDOC_002858	Representative Geanie Morrison								Legislative	Draft redistricting legislation and related data, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
PDOC_002860	Representative Geanie Morrison								Legislative	Draft redistricting legislation and related data, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0352791	Representative Jacey Jetton	JPG							Legislative	Data and related materials relating to draft redistricting legislation for House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0352792	Representative Jacey Jetton	JPG							Legislative	Data and related materials relating to draft redistricting legislation for House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0011913	Representative Philip Cortez	PDF							Legislative	legislation, kept in Representative Cortez's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0011914	Representative Philip Cortez	PDF							Legislative	legislation, kept in Representative Cortez's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0011915	Representative Philip Cortez	PDF							Legislative	legislation, kept in Representative Cortez's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0011916	Representative Philip Cortez	PDF							Legislative	legislation, kept in Representative Cortez's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0011917	Representative Philip Cortez	PDF							Legislative	legislation, kept in Representative Cortez's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0011918	Representative Philip Cortez	PDF							Legislative	legislation, kept in Representative Cortez's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0011919	Representative Philip Cortez	PDF							Legislative	legislation, kept in Representative Cortez's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0011920	Representative Philip Cortez	PDF							Legislative	legislation, kept in Representative Cortez's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0011921	Representative Philip Cortez	PDF							Legislative	legislation, kept in Representative Cortez's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0011922	Representative Philip Cortez	PDF		9/15/2021					Legislative	legislation, kept in Representative Cortez's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0011923	Representative Philip Cortez	PDF							Legislative	legislation, kept in Representative Cortez's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0011924	Representative Philip Cortez	PDF		9/17/2021					Legislative	legislation, kept in Representative Cortez's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0011925	Representative Philip Cortez	PDF	chris						Legislative	legislation, kept in Representative Cortez's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0011926	Representative Philip Cortez	PDF		9/17/2021					Legislative	legislation, kept in Representative Cortez's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0011927	Representative Philip Cortez	PDF		9/13/2021					Legislative	legislation, kept in Representative Cortez's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0011928	Representative Philip Cortez	PDF		9/13/2021					Legislative	legislation, kept in Representative Cortez's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0011929	Representative Philip Cortez	PDF		9/14/2021					Legislative	legislation, kept in Representative Cortez's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0011930	Representative Philip Cortez	PDF		9/17/2021					Legislative	legislation, kept in Representative Cortez's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0011932	Representative Philip Cortez	PDF	chris						Legislative	legislation, kept in Representative Cortez's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0011933	Representative Philip Cortez	PDF		9/15/2021					Legislative	legislation, kept in Representative Cortez's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0011934	Representative Philip Cortez	PDF		9/17/2021					Legislative	legislation, kept in Representative Cortez's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0011935	Representative Philip Cortez	PDF		9/14/2021					Legislative	legislation, kept in Representative Cortez's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0011936	Representative Philip Cortez	PDF							Legislative	legislation, kept in Representative Cortez's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0011937	Representative Philip Cortez	PDF							Legislative	legislation, kept in Representative Cortez's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0011938	Representative Philip Cortez	PDF							Legislative	legislation, kept in Representative Cortez's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0011939	Representative Philip Cortez	PDF							Legislative	legislation, kept in Representative Cortez's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0011940	Representative Philip Cortez	PDF							Legislative	legislation, kept in Representative Cortez's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0011941	Representative Philip Cortez	PDF							Legislative	legislation, kept in Representative Cortez's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0011942	Representative Philip Cortez	PDF							Legislative	legislation, kept in Representative Cortez's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0011943	Representative Philip Cortez	PDF							Legislative	legislation, kept in Representative Cortez's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0011944	Representative Philip Cortez	PDF							Legislative	legislation, kept in Representative Cortez's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0011945	Representative Philip Cortez	PDF							Legislative	legislation, kept in Representative Cortez's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0011946	Representative Philip Cortez	PDF							Legislative	legislation, kept in Representative Cortez's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0011947	Representative Philip Cortez	PDF							Legislative	legislation, kept in Representative Cortez's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0011948	Representative Philip Cortez	PDF							Legislative	legislation, kept in Representative Cortez's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0011949	Representative Philip Cortez	PDF							Legislative	legislation, kept in Representative Cortez's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0011950	Representative Philip Cortez	PDF							Legislative	legislation, kept in Representative Cortez's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0011951	Representative Philip Cortez	PDF							Legislative	legislation, kept in Representative Cortez's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0011952	Representative Philip Cortez	PDF							Legislative	legislation, kept in Representative Cortez's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0012015	Representative Philip Cortez	PDF							Legislative	legislation, kept in Representative Cortez's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0012017	Representative Philip Cortez	PDF							Legislative	legislation, kept in Representative Cortez's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0012018	Representative Philip Cortez	PDF							Legislative	legislation, kept in Representative Cortez's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0012019	Representative Philip Cortez	PDF							Legislative	legislation, kept in Representative Cortez's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0012020	Representative Philip Cortez	PDF							Legislative	legislation, kept in Representative Cortez's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0012028	Representative Philip Cortez	PDF							Legislative	legislation, kept in Representative Cortez's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0012029	Representative Philip Cortez	PDF							Legislative	legislation, kept in Representative Cortez's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0012030	Representative Philip Cortez	PDF							Legislative	legislation, kept in Representative Cortez's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0012031	Representative Philip Cortez	PDF		10/8/2021					Legislative	legislation, kept in Representative Cortez's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0012032	Representative Philip Cortez	PDF		10/13/2021					Legislative	legislation, kept in Representative Cortez's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0012033	Representative Philip Cortez	PDF		10/13/2021					Legislative	legislation, kept in Representative Cortez's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0012034	Representative Philip Cortez	PDF		10/13/2021					Legislative	legislation, kept in Representative Cortez's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0012035	Representative Philip Cortez	PDF		10/13/2021					Legislative	legislation, kept in Representative Cortez's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0012036	Representative Philip Cortez	PDF		10/13/2021					Legislative	legislation, kept in Representative Cortez's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0012037	Representative Philip Cortez	PDF		10/13/2021					Legislative	legislation, kept in Representative Cortez's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0012038	Representative Philip Cortez	PDF		10/13/2021					Legislative	legislation, kept in Representative Cortez's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0012039	Representative Philip Cortez	PDF		10/13/2021					Legislative	legislation, kept in Representative Cortez's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0356753	Representative Ryan Guillen	JPG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0356754	Representative Ryan Guillen	PNG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0356756	Representative Ryan Guillen	XLSX	Jonathan Wilson (Rep. Guillen chief of staff)	8/26/2021					Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0356757	Representative Ryan Guillen	XLSX	Jonathan Wilson (Rep. Guillen chief of staff)	9/15/2021					Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0356758	Representative Ryan Guillen	PNG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0356759	Representative Ryan Guillen	PNG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0356760	Representative Ryan Guillen	PNG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0356761	Representative Ryan Guillen	XLSX	Jonathan Wilson (Rep. Guillen chief of staff)	8/18/2021					Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0356762	Representative Ryan Guillen	PDF	Jonathan Wilson (Rep. Guillen chief of staff)	7/27/2021					Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0356763	Representative Ryan Guillen	PNG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0356765	Representative Ryan Guillen	JPG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0356766	Representative Ryan Guillen	JPG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0356789	Representative Ryan Guillen	JPG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0356790	Representative Ryan Guillen	JPG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0356791	Representative Ryan Guillen	JPG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0356792	Representative Ryan Guillen	PNG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0356793	Representative Ryan Guillen	JPG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0356794	Representative Ryan Guillen	JPG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0356795	Representative Ryan Guillen	JPG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0356796	Representative Ryan Guillen	JPG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0356797	Representative Ryan Guillen	JPG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0356798	Representative Ryan Guillen	JPG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0356799	Representative Ryan Guillen	JPG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0356800	Representative Ryan Guillen	JPG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0356801	Representative Ryan Guillen	JPG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0356802	Representative Ryan Guillen	JPG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0356803	Representative Ryan Guillen	JPG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0356804	Representative Ryan Guillen	JPG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0356805	Representative Ryan Guillen	JPG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0356806	Representative Ryan Guillen	JPG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0356807	Representative Ryan Guillen	JPG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0356838	Representative Ryan Guillen	PNG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0356839	Representative Ryan Guillen	PNG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0356840	Representative Ryan Guillen	XLSX	Jonathan Wilson (Rep. Guillen chief of staff)	9/11/2021					Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0356841	Representative Ryan Guillen	PDF		7/30/2021					Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.

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Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0356842	Representative Ryan Guillen	PNG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0356843	Representative Ryan Guillen	PNG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0356844	Representative Ryan Guillen	PNG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0356845	Representative Ryan Guillen	XLSX	Jonathan Wilson (Rep. Guillen chief of staff)	8/17/2021					Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0356846	Representative Ryan Guillen	PNG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0356847	Representative Ryan Guillen	PNG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0356848	Representative Ryan Guillen	PNG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0356849	Representative Ryan Guillen	PNG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0356850	Representative Ryan Guillen	PNG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0356851	Representative Ryan Guillen	PNG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0356852	Representative Ryan Guillen	JPG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0356853	Representative Ryan Guillen	JPG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0356854	Representative Ryan Guillen	JPG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0356855	Representative Ryan Guillen	JPG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0356856	Representative Ryan Guillen	PDF	Jonathan Wilson (Rep. Guillen chief of staff)	9/29/2021					Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0356857	Representative Ryan Guillen	XLSX	Jonathan Wilson (Rep. Guillen chief of staff)	8/17/2021					Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0356858	Representative Ryan Guillen	PNG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0356860	Representative Ryan Guillen	XLSX	Jonathan Wilson (Rep. Guillen chief of staff)	9/21/2021					Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0356861	Representative Ryan Guillen	XLSX	Jonathan Wilson (Rep. Guillen chief of staff)	8/22/2021					Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
PDOC_002096	Representative Tom Craddick								Legislative	with annotations, kept in Representative Craddick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
PDOC_002097	Representative Tom Craddick								Legislative	kept in Representative Craddick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001894	Sean Opperman	MSG		3/16/2021		Chloe Johnson			Legislative	Senate Research Center regarding summaries of committee hearings and related proceedings, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001896	Sean Opperman	MSG		5/23/2021		David Mauzy			Legislative	Senate Research Center regarding summaries of committee hearings and related proceedings, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001898	Sean Opperman	MSG		5/23/2021		David Mauzy			Legislative	Senate Research Center regarding summaries of committee hearings and related proceedings, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001901	Sean Opperman	MSG		9/8/2021		David Mauzy			Legislative	Senate Research Center regarding summaries of committee hearings and related proceedings, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001904	Sean Opperman	MSG		9/11/2021		David Mauzy			Legislative	Senate Research Center regarding summaries of committee hearings and related proceedings, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.

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Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0001907	Sean Opperman	MSG		9/13/2021		Chloe Johnson			Legislative	Senate Research Center regarding summaries of committee hearings and related proceedings, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001909	Sean Opperman	MSG		9/27/2021		Chloe Johnson			Legislative	Senate Research Center regarding summaries of committee hearings and related proceedings, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001911	Sean Opperman	PDF	Robert Cone (Senate Research Center)	9/27/2021					Legislative	Senate Research Center regarding summaries of committee hearings and related proceedings, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001912	Sean Opperman	MSG		9/29/2021		Chloe Johnson			Legislative	Senate Research Center regarding summaries of committee hearings and related proceedings, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001913	Sean Opperman	PDF	Jordan Deathe (Senate Research Center)	9/29/2021					Legislative	Senate Research Center regarding summaries of committee hearings and related proceedings, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001914	Sean Opperman	MSG		10/1/2021		Chloe Johnson			Legislative	Senate Research Center regarding summaries of committee hearings and related proceedings, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0014584	Sean Opperman	MSG		6/9/2020	Senate	Sean Opperman (attorney)	Austin Arceneaux; Molly K Spratt		Legislative	Senate Research Center regarding summaries of committee hearings and related proceedings, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001972	Senator Joan Huffman	PDF		8/22/2021					Legislative	Data relating to draft redistricting legislation for congressional districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0001974	Senator Joan Huffman	PDF		8/19/2021					Legislative	Data relating to draft redistricting legislation for congressional districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0001980	Senator Joan Huffman	PDF		10/8/2021					Legislative	Confidential draft redistricting legislation and map relating to congressional districts, and related data.	**WITHHOLD.** LP2.
DOC_0001981	Senator Joan Huffman	PDF		9/27/2021					Legislative	Confidential draft redistricting legislation and map relating to congressional districts, and related data.	**WITHHOLD.** LP2.
DOC_0001990	Senator Joan Huffman	PDF		9/26/2021					Legislative	Confidential draft redistricting legislation and map relating to congressional districts, and related data.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0002140	Senator Joan Huffman	DOCX	Anna Mackin (attorney)	10/16/2021					Legislative	Data relating to draft redistricting legislation for congressional districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0002141	Senator Joan Huffman	DOCX	Anna Mackin (attorney)	8/31/2021					Legislative	Data relating to draft redistricting legislation for congressional districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0002142	Senator Joan Huffman	DOCX	Anna Mackin (attorney)	8/18/2021					Legislative	Data relating to draft redistricting legislation for congressional districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0002278	Senator Joan Huffman	XLS							Legislative	Data relating to draft redistricting legislation for congressional districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0002307	Senator Joan Huffman	XLSX	Kurt Gore	12/15/2020					Legislative	Data relating to draft redistricting legislation for congressional districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0002407	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/22/2021					Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP2.
DOC_0002692	Senator Joan Huffman	PDF		10/3/2019					Legislative	Data relating to draft redistricting legislation for congressional districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0002693	Senator Joan Huffman	PDF		9/30/2019					Legislative	Data relating to draft redistricting legislation for congressional districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0002694	Senator Joan Huffman	PDF		10/2/2019					Legislative	Data relating to draft redistricting legislation for congressional districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0002700	Senator Joan Huffman	XLSX		2/20/2015					Legislative	Data relating to draft redistricting legislation for congressional districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0006820	Senator Joan Huffman	XLSX	Jared May (TLC)	8/15/2021					Legislative	Data relating to draft redistricting legislation for congressional districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0006821	Senator Joan Huffman	XLSX	Michael Hankins	8/13/2021					Legislative	Data relating to draft redistricting legislation for congressional districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0006822	Senator Joan Huffman	PDF		8/16/2021					Legislative	Data relating to draft redistricting legislation for congressional districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0006823	Senator Joan Huffman	PDF		8/23/2021					Legislative	Data relating to draft redistricting legislation for congressional districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0006825	Senator Joan Huffman	PDF		8/20/2021					Legislative	Data and materials relating to draft redistricting legislation for congressional districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0006826	Senator Joan Huffman	PDF		10/19/2021					Legislative	Data and related materials relating to draft redistricting legislation for congressional districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0006828	Senator Joan Huffman	PDF		10/19/2021					Legislative	Confidential draft redistricting legislation and map relating to congressional districts, and related data.	**WITHHOLD.** LP2.
DOC_0006849	Senator Joan Huffman	PDF		10/1/2021					Legislative	Confidential draft redistricting legislation and map relating to congressional districts, and related data.	**WITHHOLD.** LP2.
DOC_0006850	Senator Joan Huffman	PDF		10/1/2021					Legislative	Confidential draft redistricting legislation and map relating to congressional districts, and related data.	**WITHHOLD.** LP2.
DOC_0006851	Senator Joan Huffman	PDF		10/1/2021					Legislative	Confidential draft redistricting legislation and map relating to congressional districts, and related data.	**WITHHOLD.** LP2.
DOC_0006852	Senator Joan Huffman	PDF		10/1/2021					Legislative	Confidential draft redistricting legislation and map relating to congressional districts, and related data.	**WITHHOLD.** LP2.
DOC_0006870	Senator Joan Huffman	PDF		10/4/2021					Legislative	Confidential draft redistricting legislation and map relating to congressional districts, and related data.	**WITHHOLD.** LP2.
DOC_0006871	Senator Joan Huffman	PDF		10/4/2021					Legislative	Confidential draft redistricting legislation and map relating to congressional districts, and related data.	**WITHHOLD.** LP2.
DOC_0006872	Senator Joan Huffman	PDF		10/8/2021					Legislative	Confidential draft redistricting legislation and map relating to congressional districts, and related data.	**WITHHOLD.** LP2.
DOC_0007006	Senator Joan Huffman	PDF		12/31/2019					Legislative	Data relating to draft redistricting legislation for congressional districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0007007	Senator Joan Huffman	PDF		1/28/2020					Legislative	Data relating to draft redistricting legislation for congressional districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0007008	Senator Joan Huffman	XLSX		2/20/2015					Legislative	Data relating to draft redistricting legislation for congressional districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0007010	Senator Joan Huffman	PDF		12/30/2019					Legislative	Data relating to draft redistricting legislation for congressional districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0007073	Senator Joan Huffman	PDF		1/18/2021					Legislative	Data and related materials relating to draft redistricting legislation for congressional districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0007074	Senator Joan Huffman	PDF		1/18/2021					Legislative	Data and related materials relating to draft redistricting legislation for congressional districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0007075	Senator Joan Huffman	PDF		1/10/2021					Legislative	Data and related materials relating to draft redistricting legislation for congressional districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0007076	Senator Joan Huffman	PDF		1/10/2021					Legislative	redistricting legislation for congressional districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0352903	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0352957	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0353028	Senator Joan Huffman	PDF							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
DOC_0000139	Anna Mackin	PDF		10/1/2021					Legislative	Confidential draft of redistricting legislation, relating to congressional districts, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0000140	Anna Mackin	PDF		10/1/2021					Legislative	Confidential draft of redistricting legislation, relating to congressional districts, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0000141	Anna Mackin	PDF		10/1/2021					Legislative	Confidential draft of redistricting legislation, relating to congressional districts, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0000142	Anna Mackin	PDF		10/1/2021					Legislative	Confidential draft of redistricting legislation, relating to congressional districts, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0000147	Anna Mackin	PDF		10/8/2021					Legislative	congressional districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	**WITHHOLD.** LP2.
DOC_0000198	Anna Mackin	PDF		9/27/2021					Legislative	Confidential draft of redistricting legislation, relating to congressional districts, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
PDOC_002078	Representative Todd Hunter				Representative Todd Hunter	Congresswoman Shiela Jackson-Lee			Legislative	Confidential letter from Congresswoman Shiela Jackson-Lee to Chairman Hunter regarding redistricting legislation.	**WITHHOLD.** LP2.
DOC_0001982	Senator Joan Huffman	PDF		9/28/2021					Legislative	Confidential draft document created as part of the process of drafting redistricting legislation relating to congressional districts.	**WITHHOLD.** LP2.
DOC_0001983	Senator Joan Huffman	DOCX		9/27/2021					Legislative	Confidential draft document created as part of the process of drafting redistricting legislation relating to congressional districts.	**WITHHOLD.** LP2.
DOC_0001991	Senator Joan Huffman	DOCX	Anna Mackin (attorney)	10/3/2021					Legislative	Confidential draft document created as part of the process of drafting redistricting legislation relating to congressional districts.	**WITHHOLD.** LP2.
DOC_0002009	Senator Joan Huffman	PDF		10/1/2021					Legislative	Confidential communication from Senator Doug Miles to Senator Huffman and Representative Todd Hunter regarding draft redistricting legislation relating to congressional districts.	**WITHHOLD.** LP2.
DOC_0002308	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	12/18/2019					Legislative	Notes relating to draft redistricting legislation for congressional districts.	**WITHHOLD.** LP2.

Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0002695	Senator Joan Huffman	PDF		10/1/2019					Legislative	Data relating to draft redistricting legislation for congressional districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
DOC_0006868	Senator Joan Huffman	PDF		10/4/2021					Legislative	Confidential draft document created as part of the process of drafting redistricting legislation relating to congressional districts.	**WITHHOLD.** LP2.
DOC_0006869	Senator Joan Huffman	PDF		10/4/2021					Legislative	Confidential draft document created as part of the process of drafting redistricting legislation relating to congressional districts.	**WITHHOLD.** LP2.
DOC_0006874	Senator Joan Huffman	PDF		9/28/2021					Legislative	Confidential draft document created as part of the process of drafting redistricting legislation relating to congressional districts.	**WITHHOLD.** LP2.

Entry	Control Number	Custodian	File Extension	Author (s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
1	DOC_0012132	Lieutenant Governor Dan Patrick	PDF	Alexandra Lovell (Lt. Gov. Digital Director)	1/22/2021					Legislative	and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
2	DOC_0012133	Lieutenant Governor Dan Patrick	PDF	Alexandra Lovell (Lt. Gov. Digital Director)	1/29/2021					Legislative	and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
3	DOC_0012134	Lieutenant Governor Dan Patrick	PDF	Alexandra Lovell (Lt. Gov. Digital Director)	2/5/2021					Legislative	and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
4	DOC_0012135	Lieutenant Governor Dan Patrick	PDF	Alexandra Lovell (Lt. Gov. Digital Director)	2/19/2021					Legislative	and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
5	DOC_0012136	Lieutenant Governor Dan Patrick	PDF	Alexandra Lovell (Lt. Gov. Digital Director)	2/19/2021					Legislative	and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
6	DOC_0012137	Lieutenant Governor Dan Patrick	PDF	Alexandra Lovell (Lt. Gov. Digital Director)	2/25/2021					Legislative	and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
7	DOC_0012138	Lieutenant Governor Dan Patrick	PDF	Alexandra Lovell (Lt. Gov. Digital Director)	3/8/2021					Legislative	and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
8	DOC_0012139	Lieutenant Governor Dan Patrick	PDF	Alexandra Lovell (Lt. Gov. Digital Director)	3/11/2021					Legislative	and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
9	DOC_0012140	Lieutenant Governor Dan Patrick	DOTX	Alexandra Lovell (Lt. Gov. Digital Director)	3/25/2021					Legislative	and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
10	DOC_0012141	Lieutenant Governor Dan Patrick	PDF	Alexandra Lovell (Lt. Gov. Digital Director)	3/25/2021					Legislative	and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.

Entry	Control Number	Custodian	File Extension	Author (s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
11	DOC_0012142	Lieutenant Governor Dan Patrick	PDF	Alexandra Lovell (Lt. Gov. Digital Director)	3/25/2021					Legislative	and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
12	DOC_0012143	Lieutenant Governor Dan Patrick	DOTX	Alexandra Lovell (Lt. Gov. Digital Director)	3/30/2021					Legislative	and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
13	DOC_0012144	Lieutenant Governor Dan Patrick	PDF	Alexandra Lovell (Lt. Gov. Digital Director)	3/31/2021					Legislative	and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
14	DOC_0012145	Lieutenant Governor Dan Patrick	DOTX	Alexandra Lovell (Lt. Gov. Digital Director)	4/12/2021					Legislative	and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
15	DOC_0012146	Lieutenant Governor Dan Patrick	PDF	Microsoft Office User	5/13/2021					Legislative	and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
16	DOC_0012147	Lieutenant Governor Dan Patrick	DOCX	Microsoft Office User	4/20/2021					Legislative	and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
17	DOC_0012148	Lieutenant Governor Dan Patrick	PDF	Microsoft Office User	4/19/2021					Legislative	and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
18	DOC_0012149	Lieutenant Governor Dan Patrick	PDF	Microsoft Office User	4/29/2021					Legislative	and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
19	DOC_0012152	Lieutenant Governor Dan Patrick	DOCX	Alexandra Lovell (Lt. Gov. Digital Director)	10/21/2019					Legislative	and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
20	DOC_0012163	Lieutenant Governor Dan Patrick	PDF		5/26/2017					Legislative	and relating to redistricting, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.

Entry	Control Number	Custodian	File Extension	Author (s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
21	DOC_0012239	Lieutenant Governor Dan Patrick	PDF		4/13/2021					Legislative; Attorney Client; Work Product	Confidential retention letter from outside attorneys to Lieutenant Governor Patrick for services in connection with considering redistricting	**WITHHOLD.** LP2.
22	DOC_0012240	Lieutenant Governor Dan Patrick	DOCX	Scott Keller (attorney)	3/26/2021					Legislative; Attorney Client; Work Product	Confidential retention letter from outside attorneys to Lieutenant Governor Patrick for services in connection with considering redistricting	**WITHHOLD.** LP2.
23	DOC_0012241	Lieutenant Governor Dan Patrick	DOCX	Scott Keller (attorney)	3/26/2021					Legislative; Attorney Client; Work Product	Confidential retention letter from outside attorneys to Lieutenant Governor Patrick for services in connection with considering redistricting	**WITHHOLD.** LP2.
24	DOC_0012244	Lieutenant Governor Dan Patrick	DOCX	Steven Aranyi	10/8/2021					Legislative	Confidential retention letter from outside attorneys to Lieutenant Governor Patrick for services in connection with considering redistricting	**WITHHOLD.** LP2.
25	DOC_0012269	Lieutenant Governor Dan Patrick	MSG		10/29/2019	Gov. Chief of Staff); Sherry Sylvester (Lt. Gov. Senior Advisor); John Gibbs	Alix Morris (attorney) (Lt. Gov. Deputy General Counsel)	Chris Sterner (attorney) (Lt. Gov. General Counsel)		Legislative	Confidential communication between Lieutenant Governor Patrick and staff regarding Senate Redistricting Committee hearing, made for a legislative purpose and reflecting privileged information, including thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
26	DOC_0012270	Lieutenant Governor Dan Patrick	PDF	Alix Morris (attorney)	10/29/2019					Legislative	between Lieutenant Governor Patrick and staff regarding Senate Redistricting Committee hearing, made for a legislative purpose and reflecting privileged information, including thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
27	DOC_0012273	Lieutenant Governor Dan Patrick	MSG		9/30/2021	Gov. Chief of Staff); Sherry Sylvester (Lt. Gov. Senior Advisor); John Gibbs	Alix Morris (attorney) (Lt. Gov. Deputy General Counsel)			Legislative	Confidential communication between Lieutenant Governor Patrick and staff regarding Senate Redistricting Committee hearing, made for a legislative purpose and reflecting privileged information, including thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
28	DOC_0012274	Lieutenant Governor Dan Patrick	MSG		10/4/2021	Gov. Chief of Staff); Chris Sterner (attorney) (Lt. Gov. General Counsel)	Alix Morris (attorney) (Lt. Gov. Deputy General Counsel)			Legislative	Confidential communication between Lieutenant Governor Patrick and staff regarding Senate Redistricting Committee hearing, made for a legislative purpose and reflecting privileged information, including thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
29	DOC_0012276	Lieutenant Governor Dan Patrick	MSG		4/1/2021	Alix Morris (attorney) (Lt. Gov. Deputy General Counsel)	Chris Sterner (attorney) (Lt. Gov. General Counsel)			Legislative	Governor Patrick and staff regarding Senate Redistricting Committee hearing, made for a legislative purpose and reflecting privileged information, including thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
30	DOC_0012277	Lieutenant Governor Dan Patrick	PDF	James Whitehorne	4/1/2021					Legislative	between Lieutenant Governor Patrick staffers regarding redistricting data, made for a legislative purpose and reflecting privileged information, including thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
31	DOC_0012327	Lieutenant Governor Dan Patrick	PNG			Lt. Gov. Dan Patrick	Sherry Sylvester (Lt. Gov. Senior Advisor)			Legislative	Governor Patrick and staff regarding redistricting legislation and related process, made for a legislative purpose and reflecting privileged information, including thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.

Entry	Control Number	Custodian	File Extension	Author (s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
32	DOC_0012398	Lieutenant Governor Dan Patrick	MSG		10/11/2021	Jeff Archer (TLC Executive Director)	Darrell Davila (Lt. Gov. Chief of Staff)	(attorney); Anna Mackin (attorney); Chris Sterner (attorney); Alix Morris (attorney)		Legislative	Confidential communication between Lieutenant Governor Patrick staff and TLC regarding invoice for legal services provided in connection with redistricting litigation.	**WITHHOLD.** LP2.
33	DOC_0012399	Lieutenant Governor Dan Patrick	PDF		10/7/2021					Legislative	Attached invoice to confidential communication between Lieutenant Governor Patrick staff and TLC regarding invoice for legal services provided in connection with redistricting litigation.	**WITHHOLD.** LP2.
34	DOC_0012419	Lieutenant Governor Dan Patrick	MSG		3/11/2021	Chris Sterner (attorney) (Lt. Gov. General Counsel)	Jeff Archer (TLC Executive Director)			Legislative	Attached invoice to confidential communication between Lieutenant Governor Patrick staff and TLC regarding invoice for legal services provided in connection with redistricting litigation .	**WITHHOLD.** LP2.
35	DOC_0012420	Lieutenant Governor Dan Patrick	DOCX	ATC	3/11/2021					Legislative	Attached invoice to confidential communication between Lieutenant Governor Patrick staff and TLC regarding invoice for legal services provided in connection with redistricting litigation .	**WITHHOLD.** LP2.
36	DOC_0012421	Lieutenant Governor Dan Patrick	MSG		3/4/2021	Chris Sterner (attorney) (Lt. Gov. General Counsel)	Jeff Archer (TLC Executive Director)			Legislative	Lieutenant Governor Patrick staff and TLC regarding invoice	**WITHHOLD.** LP2.
38	DOC_0012423	Lieutenant Governor Dan Patrick	PDF		2/25/2020					Legislative	Confidential draft of contract to retain expert for use in connection with considering draft redistricting legislation.	**WITHHOLD.** LP2.
39	DOC_0012507	Lieutenant Governor Dan Patrick	PNG			Darrell Davila (Lt. Gov. Chief of Staff)	Scott Keller (attorney)			Attorney Client; Work Product	Confidential communication between Darrell Davila and attorney, made for the purpose of facilitating the rendition of legal advice in connection with redistricting legislation.	
40	DOC_0012508	Lieutenant Governor Dan Patrick	PNG			Darrell Davila (Lt. Gov. Chief of Staff)	Scott Keller (attorney)			Attorney Client; Work Product	Confidential communication between Darrell Davila and attorney, made for the purpose of facilitating the rendition of legal advice in connection with redistricting legislation.	
41	DOC_0012509	Lieutenant Governor Dan Patrick	PNG			Darrell Davila (Lt. Gov. Chief of Staff)	Scott Keller (attorney)			Attorney Client; Work Product	Confidential communication between Darrell Davila and attorney, made for the purpose of facilitating the rendition of legal advice in connection with redistricting legislation.	
42	DOC_0012510	Lieutenant Governor Dan Patrick	PNG			Darrell Davila (Lt. Gov. Chief of Staff)	Scott Keller (attorney)			Attorney Client; Work Product	Confidential communication between Darrell Davila and attorney, made for the purpose of facilitating the rendition of legal advice in connection with redistricting legislation.	
43	DOC_0012511	Lieutenant Governor Dan Patrick	PNG			Darrell Davila (Lt. Gov. Chief of Staff)	Scott Keller (attorney)			Attorney Client; Work Product	Confidential communication between Darrell Davila and attorney, made for the purpose of facilitating the rendition of legal advice in connection with redistricting legislation.	
44	DOC_0012512	Lieutenant Governor Dan Patrick	PNG			Darrell Davila (Lt. Gov. Chief of Staff)	Scott Keller (attorney)			Attorney Client; Work Product	Confidential communication between Darrell Davila and attorney, made for the purpose of facilitating the rendition of legal advice in connection with redistricting legislation.	
45	DOC_0012513	Lieutenant Governor Dan Patrick	PNG			Darrell Davila (Lt. Gov. Chief of Staff)	Scott Keller (attorney)			Attorney Client; Work Product	Confidential communication between Darrell Davila and attorney, made for the purpose of facilitating the rendition of legal advice in connection with redistricting legislation.	
46	DOC_0012514	Lieutenant Governor Dan Patrick	PNG			Darrell Davila (Lt. Gov. Chief of Staff)	Scott Keller (attorney)			Attorney Client; Work Product	Confidential communication between Darrell Davila and attorney, made for the purpose of facilitating the rendition of legal advice in connection with redistricting legislation.	

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Entry	Control Number	Custodian	File Extension	Author (s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
47	DOC_0012515	Lieutenant Governor Dan Patrick	PNG			Darrell Davila (Lt. Gov. Chief of Staff)	Scott Keller (attorney)			Attorney Client; Work Product	Confidential communication between Darrell Davila and attorney, made for the purpose of facilitating the rendition of legal advice in connection with redistricting legislation.	
48	DOC_0012516	Lieutenant Governor Dan Patrick	PNG			Darrell Davila (Lt. Gov. Chief of Staff)	Scott Keller (attorney)			Attorney Client; Work Product	Confidential communication between Darrell Davila and attorney, made for the purpose of facilitating the rendition of legal advice in connection with redistricting legislation.	
49	DOC_0012517	Lieutenant Governor Dan Patrick	PNG			Darrell Davila (Lt. Gov. Chief of Staff)	Scott Keller (attorney)			Attorney Client; Work Product	Confidential communication between Darrell Davila and attorney, made for the purpose of facilitating the rendition of legal advice in connection with redistricting legislation.	
50	DOC_0012522	Lieutenant Governor Dan Patrick	JPG			Darrell Davila (Lt. Gov. Chief of Staff)	Luis Saenz (Gov. Abbott Chief of Staff)			Legislative	Confidential communication between Darrell Davila and Luis Saenz regarding redistricting, reflecting legislative thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
51	DOC_0012554	Lieutenant Governor Dan Patrick	JPG			Darrell Davila (Lt. Gov. Chief of Staff)	Alix Morris (attorney) (Lt. Gov. Deputy General Counsel)			Legislative; Attorney Client; Work Product	Governor Patrick and/or his staff made for a legislative purpose and reflecting privileged information, including thoughts, opinions, and mental impressions. Additionally, the document reflects confidential legal advice provided by counsel and the thoughts and mental impressions of counsel.	**WITHHOLD.** LP2.
55	PDOC_002870	Lieutenant Governor Dan Patrick								Legislative	redistricting legislation, with annotations, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
56	PDOC_002871	Lieutenant Governor Dan Patrick								Legislative	redistricting legislation, with annotations, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
57	PDOC_002874	Lieutenant Governor Dan Patrick								Legislative	redistricting legislation, with annotations, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
58	PDOC_002935	Lieutenant Governor Dan Patrick								Legislative	Governor Patrick and other legislators regarding draft redistricting legislation, made for a legislative purpose and reflecting privileged information, including thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
59	PDOC_002938	Lieutenant Governor Dan Patrick								Legislative	redistricting legislation for state senate districts, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
60	PDOC_002942	Lieutenant Governor Dan Patrick								Legislative	Data relating to draft redistricting legislation for school board of education districts, created, received, and/or gathered for the purpose of working on redistricting legislation .	**WITHHOLD.** LP2.

Entry	Control Number	Custodian	File Extension	Author (s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
61	PDOC_002943	Lieutenant Governor Dan Patrick								Legislative	redistricting legislation for state senate districts, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
62	PDOC_002944	Lieutenant Governor Dan Patrick								Legislative	redistricting legislation for state senate districts, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
63	PDOC_002945	Lieutenant Governor Dan Patrick								Legislative	redistricting legislation for state senate districts, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
64	PDOC_002948	Lieutenant Governor Dan Patrick								Legislative	redistricting legislation for state senate districts, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
65	PDOC_002950	Lieutenant Governor Dan Patrick								Legislative	redistricting legislation for state senate districts, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
66	PDOC_002951	Lieutenant Governor Dan Patrick								Legislative	redistricting legislation for state senate districts, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
67	PDOC_002954	Lieutenant Governor Dan Patrick								Legislative	redistricting legislation for state senate districts, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
68	PDOC_002955	Lieutenant Governor Dan Patrick								Legislative	redistricting legislation for congressional districts, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.

Entry	Control Number	Custodian	File Extension	Author (s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
69	PDOC_002956	Lieutenant Governor Dan Patrick								Legislative	redistricting legislation for congressional districts, kept in Lieutenant Governor Patrick's files for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
70	DOC_0356616	Representative Brooks Landgraf	PDF		8/22/2021					Legislative	Data relating to draft redistricting legislation for House districts, created, received, and/or gathered for the purpose of working on redistricting legislation .	**WITHHOLD.** LP1.
71	DOC_0356617	Representative Brooks Landgraf	PDF		8/22/2020					Legislative	Data relating to draft redistricting legislation for House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
72	DOC_0356619	Representative Brooks Landgraf	PDF		8/23/2021					Legislative	Data relating to draft redistricting legislation for school board of education districts, created, received, and/or gathered for the purpose of working on redistricting legislation .	**WITHHOLD.** LP1.
73	DOC_0356620	Representative Brooks Landgraf	PDF	ste955	3/17/2021					Legislative	Data relating to draft redistricting legislation for House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
74	DOC_0356621	Representative Brooks Landgraf	csv							Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
75	DOC_0356626	Representative Brooks Landgraf	PDF	Erica Sebree	8/24/2021	Members of the 87th Legislature	Representative Hunter			Legislative	Confidential communication from Chairman Hunter to members of the 87th Legislature regarding the legislative redistricting process.	**WITHHOLD.** LP1.
76	DOC_0356658	Representative Brooks Landgraf	PDF							Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	**WITHHOLD.** LP2.
77	DOC_0356659	Representative Brooks Landgraf	PDF							Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	**WITHHOLD.** LP2.
78	DOC_0356660	Representative Brooks Landgraf	PDF							Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	**WITHHOLD.** LP2.
79	DOC_0356661	Representative Brooks Landgraf	PDF							Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	**WITHHOLD.** LP2.
80	DOC_0356662	Representative Brooks Landgraf	PDF							Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	**WITHHOLD.** LP2.
81	DOC_0356663	Representative Brooks Landgraf	PDF							Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	**WITHHOLD.** LP2.
82	DOC_0356664	Representative Brooks Landgraf	PDF							Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	**WITHHOLD.** LP2.
83	DOC_0356665	Representative Brooks Landgraf	PDF							Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	**WITHHOLD.** LP2.
84	DOC_0356666	Representative Brooks Landgraf	PDF							Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	**WITHHOLD.** LP2.
85	DOC_0356667	Representative Brooks Landgraf	PDF							Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	**WITHHOLD.** LP2.
86	DOC_0356668	Representative Brooks Landgraf	PDF							Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	**WITHHOLD.** LP2.
87	DOC_0356669	Representative Brooks Landgraf	PDF							Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	**WITHHOLD.** LP2.
88	DOC_0356670	Representative Brooks Landgraf	PDF							Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	**WITHHOLD.** LP2.
89	DOC_0356671	Representative Brooks Landgraf	PDF							Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	**WITHHOLD.** LP2.
90	DOC_0356672	Representative Brooks Landgraf	PDF							Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	**WITHHOLD.** LP2.
91	DOC_0356673	Representative Brooks Landgraf	PDF							Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	**WITHHOLD.** LP2.

Entry	Control Number	Custodian	File Extension	Author (s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
92	DOC_0356674	Representative Brooks Landgraf	PDF							Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	**WITHHOLD.** LP2.
93	DOC_0356675	Representative Brooks Landgraf	PDF							Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	**WITHHOLD.** LP2.
94	DOC_0356676	Representative Brooks Landgraf	PDF							Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	**WITHHOLD.** LP2.
95	DOC_0356677	Representative Brooks Landgraf	PDF							Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	**WITHHOLD.** LP2.
96	DOC_0356678	Representative Brooks Landgraf	PDF							Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	**WITHHOLD.** LP2.
97	DOC_0356679	Representative Brooks Landgraf	PDF							Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	**WITHHOLD.** LP2.
98	DOC_0356680	Representative Brooks Landgraf	PDF							Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	**WITHHOLD.** LP2.
99	DOC_0356681	Representative Brooks Landgraf	PDF							Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	**WITHHOLD.** LP2.
100	DOC_0356686	Representative Brooks Landgraf	PDF							Legislative	Confidential calendar entries relating to meetings regarding legislative redistricting process.	**WITHHOLD.** LP2.
101	DOC_0356694	Representative Brooks Landgraf	DOCX							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
102	DOC_0356695	Representative Brooks Landgraf	XLSX							Legislative	Data relating to draft redistricting legislation for House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
103	DOC_0356697	Representative Brooks Landgraf	XLSX							Legislative	Data relating to draft redistricting legislation for House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
104	DOC_0356699	Representative Brooks Landgraf	PDF	State of Texas	10/4/21					Legislative	Confidential document relating to draft redistricting legislation for House districts.	**WITHHOLD.** LP1.
105	DOC_0356700	Representative Brooks Landgraf	PDF							Legislative	Confidential document relating to draft redistricting legislation for House districts.	**WITHHOLD.** LP1.
106	DOC_0356701	Representative Brooks Landgraf	PDF		10/8/21					Legislative	Confidential document relating to draft redistricting legislation for House districts.	**WITHHOLD.** LP1.
108	DOC_0356705	Representative Brooks Landgraf	DOCX							Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP1.
109	DOC_0356708	Representative Brooks Landgraf	PDF	State of Texas	10/9/2021					Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to Senate districts.	**WITHHOLD.** LP1.
110	DOC_0356709	Representative Brooks Landgraf	PDF		10/9/2021					Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to Senate districts.	**WITHHOLD.** LP1.
111	DOC_0356710	Representative Brooks Landgraf	PDF		10/5/2021					Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to Senate districts.	**WITHHOLD.** LP1.
112	DOC_0356711	Representative Brooks Landgraf	PDF	State of Texas	10/9/21					Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to congressional districts.	**WITHHOLD.** LP1.
113	DOC_0356712	Representative Brooks Landgraf	PDF		10/9/2021					Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to congressional districts.	**WITHHOLD.** LP1.
114	DOC_0356713	Representative Brooks Landgraf	PDF		10/5/2021					Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to congressional districts.	**WITHHOLD.** LP1.
115	DOC_0356714	Representative Brooks Landgraf	PDF		10/9/2021					Legislative	Confidential document relating to draft redistricting legislation for House districts.	**WITHHOLD.** LP1.
116	DOC_0356715	Representative Brooks Landgraf	PDF							Legislative	Confidential document relating to draft redistricting legislation for House districts.	**WITHHOLD.** LP1.

Entry	Control Number	Custodian	File Extension	Author (s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
117	DOC_0356716	Representative Brooks Landgraf	PDF	State of Texas	10/9/2021					Legislative	Confidential document relating to draft redistricting legislation for House districts.	**WITHHOLD.** LP1.
118	DOC_0356717	Representative Brooks Landgraf	PDF		9/29/2021					Legislative	Confidential document relating to draft redistricting legislation for House districts.	**WITHHOLD.** LP1.
119	DOC_0356718	Representative Brooks Landgraf	PDF							Legislative	Confidential document relating to draft redistricting legislation for House districts.	**WITHHOLD.** LP1.
120	DOC_0356719	Representative Brooks Landgraf	PDF		9/29/2021					Legislative	Data relating to draft redistricting legislation for House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
121	DOC_0356720	Representative Brooks Landgraf	PDF		10/5/2021					Legislative	Data relating to draft redistricting legislation for House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
122	DOC_0356721	Representative Brooks Landgraf	PDF		10/5/2021					Legislative	Data relating to draft redistricting legislation for House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
123	DOC_0356722	Representative Brooks Landgraf	PDF		10/5/2021					Legislative	Data relating to draft redistricting legislation for House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
125	PDOC_004650	Representative Brooks Landgraf								Legislative	Data and related materials relating to draft redistricting legislation for House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
142	DOC_0352739	Representative Jacey Jetton	JPG							Legislative	Confidential document relating to draft redistricting legislation for House districts.	**WITHHOLD.** LP1.
143	DOC_0352740	Representative Jacey Jetton	JPG							Legislative	Confidential document relating to draft redistricting legislation for House districts.	**WITHHOLD.** LP1.
144	DOC_0352741	Representative Jacey Jetton	JPG							Legislative	Confidential document relating to draft redistricting legislation for House districts.	**WITHHOLD.** LP1.
145	DOC_0352742	Representative Jacey Jetton	JPG							Legislative	Confidential document relating to draft redistricting legislation for House districts.	**WITHHOLD.** LP1.
146	DOC_0352743	Representative Jacey Jetton	JPG							Legislative	Confidential document relating to draft redistricting legislation for House districts.	**WITHHOLD.** LP1.
150	DOC_0352748	Representative Jacey Jetton	JPG							Legislative	Confidential document relating to draft redistricting legislation for House districts.	**WITHHOLD.** LP1.
151	DOC_0352749	Representative Jacey Jetton	JPG							Legislative	Confidential document relating to draft redistricting legislation for House districts.	**WITHHOLD.** LP1.
152	DOC_0352750	Representative Jacey Jetton	JPG							Legislative	Confidential document relating to draft redistricting legislation for House districts.	**WITHHOLD.** LP1.
153	DOC_0352751	Representative Jacey Jetton	JPG							Legislative	Confidential document relating to draft redistricting legislation for House districts.	**WITHHOLD.** LP1.
154	DOC_0352752	Representative Jacey Jetton	JPG							Legislative	Confidential document relating to draft redistricting legislation for House districts.	**WITHHOLD.** LP1.
155	DOC_0352753	Representative Jacey Jetton	JPG							Legislative	Confidential document relating to draft redistricting legislation for House districts.	**WITHHOLD.** LP1.
156	DOC_0352754	Representative Jacey Jetton	JPG							Legislative	Confidential document relating to draft redistricting legislation for House districts.	**WITHHOLD.** LP1.
157	DOC_0352755	Representative Jacey Jetton	JPG							Legislative	Confidential document relating to draft redistricting legislation for House districts.	**WITHHOLD.** LP1.
158	DOC_0352756	Representative Jacey Jetton	JPG							Legislative	Confidential document relating to draft redistricting legislation for House districts.	**WITHHOLD.** LP1.
160	DOC_0352758	Representative Jacey Jetton	JPG							Legislative	Confidential document relating to draft redistricting legislation for House districts.	**WITHHOLD.** LP1.
161	DOC_0352759	Representative Jacey Jetton	JPG							Legislative	Confidential document relating to draft redistricting legislation for House districts.	**WITHHOLD.** LP1.

Entry	Control Number	Custodian	File Extension	Author (s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
162	DOC_0352760	Representative Jacey Jetton	JPG							Legislative	Confidential document relating to draft redistricting legislation for House districts.	**WITHHOLD.** LP1.
163	DOC_0352761	Representative Jacey Jetton	JPG							Legislative	Confidential document relating to draft redistricting legislation for House districts.	**WITHHOLD.** LP1.
164	DOC_0352762	Representative Jacey Jetton	JPG							Legislative	Confidential document relating to draft redistricting legislation for House districts.	**WITHHOLD.** LP1.
165	DOC_0352763	Representative Jacey Jetton	JPG							Legislative	Confidential document relating to draft redistricting legislation for House districts.	**WITHHOLD.** LP1.
166	DOC_0352764	Representative Jacey Jetton	JPG							Legislative	Confidential document relating to draft redistricting legislation for House districts.	**WITHHOLD.** LP1.
167	DOC_0352765	Representative Jacey Jetton	JPG							Legislative	Confidential document relating to draft redistricting legislation for House districts.	**WITHHOLD.** LP1.
171	DOC_0352769	Representative Jacey Jetton	JPG							Legislative	Confidential document relating to draft redistricting legislation for House districts.	**WITHHOLD.** LP1.
172	DOC_0352770	Representative Jacey Jetton	JPG							Legislative	Confidential document relating to draft redistricting legislation for House districts.	**WITHHOLD.** LP1.
173	DOC_0352771	Representative Jacey Jetton	JPG							Legislative	Confidential document relating to draft redistricting legislation for House districts.	**WITHHOLD.** LP1.
174	DOC_0352772	Representative Jacey Jetton	JPG							Legislative	Confidential document relating to draft redistricting legislation for House districts.	**WITHHOLD.** LP1.
175	DOC_0352773	Representative Jacey Jetton	JPG							Legislative	Confidential document relating to draft redistricting legislation for House districts.	**WITHHOLD.** LP1.
176	DOC_0352774	Representative Jacey Jetton	JPG							Legislative	Confidential document relating to draft redistricting legislation for House districts.	**WITHHOLD.** LP1.
177	DOC_0352775	Representative Jacey Jetton	JPG							Legislative	Confidential document relating to draft redistricting legislation for House districts.	**WITHHOLD.** LP1.
178	DOC_0352776	Representative Jacey Jetton	JPG							Legislative	Confidential document relating to draft redistricting legislation for House districts.	**WITHHOLD.** LP1.
179	DOC_0352777	Representative Jacey Jetton	JPG							Legislative	Confidential document relating to draft redistricting legislation for House districts.	**WITHHOLD.** LP1.
180	DOC_0352778	Representative Jacey Jetton	PNG							Legislative	Confidential document relating to draft redistricting legislation for House districts.	**WITHHOLD.** LP1.
181	DOC_0352779	Representative Jacey Jetton	JPG							Legislative	Confidential document relating to draft redistricting legislation for House districts.	**WITHHOLD.** LP1.
183	DOC_0352781	Representative Jacey Jetton	JPG							Legislative	Confidential document relating to draft redistricting legislation for House districts.	**WITHHOLD.** LP1.
184	DOC_0352782	Representative Jacey Jetton	JPG							Legislative	Confidential document relating to draft redistricting legislation for House districts.	**WITHHOLD.** LP1.
185	DOC_0352783	Representative Jacey Jetton	JPG							Legislative	Confidential document relating to draft redistricting legislation for House districts.	**WITHHOLD.** LP1.
186	DOC_0352784	Representative Jacey Jetton	JPG							Legislative	Confidential document relating to draft redistricting legislation for House districts.	**WITHHOLD.** LP1.
187	DOC_0352785	Representative Jacey Jetton	JPG							Legislative	Confidential document relating to draft redistricting legislation for House districts.	**WITHHOLD.** LP1.
188	DOC_0352786	Representative Jacey Jetton	JPG							Legislative	Confidential document relating to draft redistricting legislation for House districts.	**WITHHOLD.** LP1.
193	DOC_0352791	Representative Jacey Jetton	JPG							Legislative	Data and related materials relating to draft redistricting legislation for House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
194	DOC_0352792	Representative Jacey Jetton	JPG							Legislative	Data and related materials relating to draft redistricting legislation for House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
195	DOC_0352802	Representative Jacey Jetton	PDF	Tori Macfarlan						Legislative	Communications received from members of the public regarding redistricting, with internal notes.	**WITHHOLD.** LP2.
196	DOC_0352803	Representative Jacey Jetton	XLSX	Tori Macfarlan						Legislative	Communications received from members of the public regarding redistricting, with internal notes.	**WITHHOLD.** LP2.

Entry	Control Number	Custodian	File Extension	Author (s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
197	DOC_0352804	Representative Jacey Jetton	PDF	Tori Macfarlan						Legislative	Communications received from members of the public regarding redistricting, with internal notes.	**WITHHOLD.** LP2.
198	DOC_0352805	Representative Jacey Jetton	XLSX	Tori Macfarlan						Legislative	Communications received from members of the public regarding redistricting, with internal notes.	**WITHHOLD.** LP2.
199	DOC_0352806	Representative Jacey Jetton	PDF	Tori Macfarlan						Legislative	Communications received from members of the public regarding redistricting, with internal notes.	**WITHHOLD.** LP2.
200	DOC_0352807	Representative Jacey Jetton	XLSX	Tori Macfarlan						Legislative	Communications received from members of the public regarding redistricting, with internal notes.	**WITHHOLD.** LP2.
201	DOC_0352811	Representative Jacey Jetton	PDF		10/15/2021					Legislative	Confidential document relating to draft redistricting legislation for House districts.	**WITHHOLD.** LP1.
202	DOC_0352812	Representative Jacey Jetton	DOCX	Jacey Jetton	10/12/2021					Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP2.
204	DOC_0352827	Representative Jacey Jetton	DOCX	Jacey Jetton	10/12/2021					Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP2.
205	DOC_0352829	Representative Jacey Jetton	DOCX	Jacey Jetton	10/12/2021					Legislative	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts.	**WITHHOLD.** LP2.
206	DOC_0352853	Representative Jacey Jetton	PDF	torim		Lewis Luckenbach	Representative Jetton			Legislative	Confidential communication regarding draft redistricting legislation.	**WITHHOLD.** LP1.
208	DOC_0352887	Representative Jacey Jetton	PNG			Sophia Copeland	Representative Jetton			Legislative	Confidential communication regarding draft redistricting legislation.	**WITHHOLD.** LP1.
210	DOC_0352890	Representatve Jacey Jetton	JPG							Legislative	Confidential document relating to draft redistricting legislation for House districts.	**WITHHOLD.** LP1.
216	PDOC_004806	Representative Jacey Jetton								Legislative	Confidential document relating to draft redistricting legislation for House districts.	**WITHHOLD.** LP1.
217	PDOC_004807	Representative Jacey Jetton								Legislative	Confidential document relating to draft redistricting legislation for House districts.	**WITHHOLD.** LP1.
218	PDOC_004808	Representative Jacey Jetton								Legislative	Confidential document relating to draft redistricting legislation for House districts.	**WITHHOLD.** LP1.
219	DOC_0356753	Representative Ryan Guillen	JPG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
220	DOC_0356754	Representative Ryan Guillen	PNG	Jonathan Wilson (Rep. Guillen chief of staff)						Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
221	DOC_0356756	Representative Ryan Guillen	XLSX	Jonathan Wilson (Rep. Guillen chief of staff)	8/26/2021					Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
222	DOC_0356757	Representative Ryan Guillen	XLSX		9/15/2021					Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
223	DOC_0356758	Representative Ryan Guillen	PNG	Jonathan Wilson (Rep. Guillen chief of staff)						Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
224	DOC_0356759	Representative Ryan Guillen	PNG	Jonathan Wilson (Rep. Guillen chief of staff)						Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
225	DOC_0356760	Representative Ryan Guillen	PNG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.

Entry	Control Number	Custodian	File Extension	Author (s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
226	DOC_0356761	Representative Ryan Guillen	XLSX	Jonathan Wilson (Rep. Guillen chief of staff)	8/18/2021					Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
227	DOC_0356762	Representative Ryan Guillen	PDF	Jonathan Wilson (Rep. Guillen chief of staff)	7/27/2021					Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
228	DOC_0356763	Representative Ryan Guillen	PNG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
229	DOC_0356764	Representative Ryan Guillen	PNG	Jonathan Wilson (Rep. Guillen chief of staff)						Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
230	DOC_0356765	Representative Ryan Guillen	JPG	Jonathan Wilson (Rep. Guillen chief of staff)						Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
231	DOC_0356766	Representative Ryan Guillen	JPG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
254	DOC_0356789	Representative Ryan Guillen	JPG	Jonathan Wilson (Rep. Guillen chief of staff)						Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
255	DOC_0356790	Representative Ryan Guillen	JPG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
256	DOC_0356791	Representative Ryan Guillen	JPG	Jonathan Wilson (Rep. Guillen chief of staff)						Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
257	DOC_0356792	Representative Ryan Guillen	PNG	Jonathan Wilson (Rep. Guillen chief of staff)						Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
258	DOC_0356793	Representative Ryan Guillen	JPG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
259	DOC_0356794	Representative Ryan Guillen	JPG	Jonathan Wilson (Rep. Guillen chief of staff)						Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
260	DOC_0356795	Representative Ryan Guillen		Jonathan Wilson (Rep. Guillen chief of staff)						Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
261	DOC_0356796	Representative Ryan Guillen	JPG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
262	DOC_0356797	Representative Ryan Guillen	JPG	Jonathan Wilson (Rep. Guillen chief of staff)						Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.

Entry	Control Number	Custodian	File Extension	Author (s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
263	DOC_0356798	Representative Ryan Guillen	JPG	Jonathan Wilson (Rep. Guillen chief of staff)						Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
264	DOC_0356799	Representative Ryan Guillen	JPG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
265	DOC_0356800	Representative Ryan Guillen	JPG	Jonathan Wilson (Rep. Guillen chief of staff)						Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
266	DOC_0356801	Representative Ryan Guillen	JPG	Jonathan Wilson (Rep. Guillen chief of staff)						Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
267	DOC_0356802	Representative Ryan Guillen	JPG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
268	DOC_0356803	Representative Ryan Guillen	JPG	Jonathan Wilson (Rep. Guillen chief of staff)						Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
269	DOC_0356804	Representative Ryan Guillen	JPG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
270	DOC_0356805	Representative Ryan Guillen	JPG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
271	DOC_0356806	Representative Ryan Guillen	JPG	Jonathan Wilson (Rep. Guillen chief of staff)						Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
272	DOC_0356807	Representative Ryan Guillen	JPG	Jonathan Wilson (Rep. Guillen chief of staff)						Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
302	DOC_0356837	Representative Ryan Guillen	PNG	Jonathan Wilson (Rep. Guillen chief of staff)						Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
303	DOC_0356838	Representative Ryan Guillen	PNG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
304	DOC_0356839	Representative Ryan Guillen	PNG	Jonathan Wilson (Rep. Guillen chief of staff)						Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation .	**WITHHOLD.** LP2.
305	DOC_0356840	Representative Ryan Guillen	XLSX	Jonathan Wilson (Rep. Guillen chief of staff)	9/11/2021					Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
306	DOC_0356841	Representative Ryan Guillen	PDF		7/30/2021					Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.

Entry	Control Number	Custodian	File Extension	Author (s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
307	DOC_0356842	Representative Ryan Guillen	PNG	Jonathan Wilson (Rep. Guillen chief of staff)						Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
308	DOC_0356843	Representative Ryan Guillen	PNG	Jonathan Wilson (Rep. Guillen chief of staff)						Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
309	DOC_0356844	Representative Ryan Guillen	PNG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
310	DOC_0356845	Representative Ryan Guillen	XLSX	Jonathan Wilson (Rep. Guillen chief of staff)	8/17/2021					Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
311	DOC_0356846	Representative Ryan Guillen	PNG	Jonathan Wilson (Rep. Guillen chief of staff)						Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
312	DOC_0356847	Representative Ryan Guillen	PNG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
313	DOC_0356848	Representative Ryan Guillen	PNG	Jonathan Wilson (Rep. Guillen chief of staff)						Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
314	DOC_0356849	Representative Ryan Guillen	PNG	Jonathan Wilson (Rep. Guillen chief of staff)						Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
315	DOC_0356850	Representative Ryan Guillen	PNG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
316	DOC_0356851	Representative Ryan Guillen	PNG	Jonathan Wilson (Rep. Guillen chief of staff)						Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
317	DOC_0356852	Representative Ryan Guillen	JPG	Jonathan Wilson (Rep. Guillen chief of staff)						Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
318	DOC_0356853	Representative Ryan Guillen	JPG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
319	DOC_0356854	Representative Ryan Guillen	JPG	Jonathan Wilson (Rep. Guillen chief of staff)						Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
320	DOC_0356855	Representative Ryan Guillen	JPG	Jonathan Wilson (Rep. Guillen chief of staff)						Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
321	DOC_0356856	Representative Ryan Guillen	PDF		9/29/2021					Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.

Entry	Control Number	Custodian	File Extension	Author (s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
322	DOC_0356857	Representative Ryan Guillen	XLSX	Jonathan Wilson (Rep. Guillen chief of staff)	8/17/2021					Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
323	DOC_0356858	Representative Ryan Guillen	PNG	Jonathan Wilson (Rep. Guillen chief of staff)						Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
324	DOC_0356859	Representative Ryan Guillen	PNG							Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
325	DOC_0356860	Representative Ryan Guillen	XLSX	Jonathan Wilson (Rep. Guillen chief of staff)	9/21/2021					Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
326	DOC_0356861	Representative Ryan Guillen	XLSX	Jonathan Wilson (Rep. Guillen chief of staff)	8/22/2021					Legislative	Data and other materials related to draft redistricting legislation for Texas House districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
329	PDOC_001768	Representative Todd Hunter								Legislative; Attorney Client	Confidential invoices, identifying privileged work performed at the direction of legislative members or at the direction of counsel, for legal services rendered in connection with	**WITHHOLD.** LP2.
330	PDOC_001774	Representative Todd Hunter								Legislative; Attorney Client	Confidential invoices, identifying privileged work performed at the direction of legislative members or at the direction of counsel, for legal services rendered in connection with	**WITHHOLD.** LP2.
331	PDOC_001812	Representative Todd Hunter								Legislative; Attorney Client	Confidential invoices, identifying privileged work performed at the direction of legislative members or at the direction of counsel, for legal services rendered in connection with	**WITHHOLD.** LP2.
332	PDOC_001883	Representative Todd Hunter								Legislative; Attorney Client	Confidential invoices, identifying privileged work performed at the direction of legislative members or at the direction of counsel, for legal services rendered in connection with	**WITHHOLD.** LP2.
333	PDOC_001890	Representative Todd Hunter								Legislative; Attorney Client	Confidential invoices, identifying privileged work performed at the direction of legislative members or at the direction of counsel, for legal services rendered in connection with	**WITHHOLD.** LP2.
334	PDOC_001896	Representative Todd Hunter								Legislative; Attorney Client	Confidential invoices, identifying privileged work performed at the direction of legislative members or at the direction of counsel, for legal services rendered in connection with	**WITHHOLD.** LP2.
335	PDOC_001901	Representative Todd Hunter								Legislative; Attorney Client	Confidential invoices, identifying privileged work performed at the direction of legislative members or at the direction of counsel, for legal services rendered in connection with	**WITHHOLD.** LP2.
336	PDOC_001924	Representative Todd Hunter								Legislative; Attorney Client	Confidential invoices, identifying privileged work performed at the direction of legislative members or at the direction of counsel, for legal services rendered in connection with	**WITHHOLD.** LP2.
337	PDOC_001929	Representative Todd Hunter								Legislative; Attorney Client	Confidential invoices, identifying privileged work performed at the direction of legislative members or at the direction of counsel, for legal services rendered in connection with	**WITHHOLD.** LP2.
338	PDOC_001936	Representative Todd Hunter								Legislative; Attorney Client	Confidential invoices, identifying privileged work performed at the direction of legislative members or at the direction of counsel, for legal services rendered in connection with	**WITHHOLD.** LP2.

Entry	Control Number	Custodian	File Extension	Author (s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
339	PDOC_001960	Representative Todd Hunter								Legislative; Attorney Client	Confidential invoices, identifying privileged work performed at the direction of legislative members or at the direction of counsel, for legal services rendered in connection with	**WITHHOLD.** LP2.
340	PDOC_001968	Representative Todd Hunter								Legislative; Attorney Client	Confidential invoices, identifying privileged work performed at the direction of legislative members or at the direction of counsel, for legal services rendered in connection with	**WITHHOLD.** LP2.
341	PDOC_001986	Representative Todd Hunter								Legislative; Attorney Client	Confidential invoices, identifying privileged work performed at the direction of legislative members or at the direction of counsel, for legal services rendered in connection with	**WITHHOLD.** LP2.
342	PDOC_001997	Representative Todd Hunter								Legislative; Attorney Client	Confidential invoices, identifying privileged work performed at the direction of legislative members or at the direction of counsel, for legal services rendered in connection with	**WITHHOLD.** LP2.
343	PDOC_002004	Representative Todd Hunter				Representative Todd Hunter	Congresswoman Eddie Bernice Johnson			Legislative	Confidential letter from Congresswoman Eddie Bernice Johnson to Chairman Hunter regarding redistricting legislation.	**WITHHOLD.** LP2.
344	PDOC_002078	Representative Todd Hunter				Representative Todd Hunter	Congresswoman Shiela Jackson Lee			Legislative	Confidential letter from Congresswoman Shiela Jackson-Lee to Chairman Hunter regarding redistricting legislation.	**WITHHOLD.** LP2.
345	DOC_0001972	Senator Joan Huffman	PDF		8/22/2021					Legislative	Data relating to draft redistricting legislation for congressional districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
346	DOC_0001973	Senator Joan Huffman	PDF		8/22/2021					Legislative	Data relating to draft redistricting legislation for congressional districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
347	DOC_0001974	Senator Joan Huffman	PDF		8/19/2021					Legislative	Data relating to draft redistricting legislation for congressional districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
348	DOC_0001975	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	9/20/2021					Legislative; Attorney Client; Work Product	Talking points, notes, data, and other materials regarding draft redistricting legislation relating to House districts, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
350	DOC_0001977	Senator Joan Huffman	DOCX	Anna Mackin (attorney)	10/14/2021					Legislative; Attorney Client; Work Product	Confidential draft talking points for committee of Senate floor regarding draft redistricting legislation, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
351	DOC_0001978	Senator Joan Huffman	DOCX	Anna Mackin (attorney)	10/7/2021					Legislative; Attorney Client; Work Product	Confidential draft talking points for committee of Senate floor regarding draft redistricting legislation, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
352	DOC_0001979	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	10/3/2021					Legislative; Attorney Client; Work Product	Confidential draft talking points for committee of Senate floor regarding draft redistricting legislation, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
353	DOC_0001980	Senator Joan Huffman	PDF		10/8/2021					Legislative	Data relating to draft redistricting legislation for congressional districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
354	DOC_0001981	Senator Joan Huffman	PDF		9/27/2021					Legislative	Data relating to draft redistricting legislation for congressional districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
355	DOC_0001982	Senator Joan Huffman	PDF	State of Texas	9/29/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	**WITHHOLD.** LP1.

Entry	Control Number	Custodian	File Extension	Author (s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
356	DOC_0001983	Senator Joan Huffman	DOCX	SO	9/27/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation .	**WITHHOLD.** LP1.
357	DOC_0001984	Senator Joan Huffman	PDF		9/27/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	**WITHHOLD.** LP1.
358	DOC_0001985	Senator Joan Huffman	PDF		9/28/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation .	**WITHHOLD.** LP1.
359	DOC_0001986	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	10/17/2021					Legislative; Attorney Client; Work Product	Confidential bill draft and related materials, regarding draft redistricting legislation, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
360	DOC_0001987	Senator Joan Huffman	DOCX	Allison Schmitz	10/16/2021					Legislative; Attorney Client; Work Product	Confidential bill draft and related materials, regarding draft redistricting legislation, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
361	DOC_0001988	Senator Joan Huffman	DOCX	Allison Schmitz	10/16/2021					Legislative; Attorney Client; Work Product	Confidential bill draft and related materials, regarding draft redistricting legislation, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
362	DOC_0001989	Senator Joan Huffman	DOCX	Zachary Stephenson	10/16/2021					Legislative; Attorney Client; Work Product	Confidential bill draft and related materials, regarding draft redistricting legislation, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
363	DOC_0001990	Senator Joan Huffman	PDF		9/26/2021					Legislative	Data relating to draft redistricting legislation for congressional districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
364	DOC_0001991	Senator Joan Huffman	DOCX	Anna Mackin	10/3/2021					Legislative	Confidential analysis of proposed amendments relating to the legislative redistricting process.	**WITHHOLD.** LP2.
365	DOC_0001992	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	9/29/2021					Legislative	Confidential draft talking points for committee of Senate floor regarding draft redistricting legislation, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
366	DOC_0001993	Senator Joan Huffman	DOCX	Anna Mackin (attorney)	9/29/2021					Legislative; Attorney Client; Work Product	Confidential draft talking points for committee of Senate floor regarding draft redistricting legislation, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
367	DOC_0001994	Senator Joan Huffman	DOCX	Sarah Willcox	10/12/2021					Legislative; Attorney Client; Work Product	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
368	DOC_0001995	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	10/12/2021					Legislative; Attorney Client; Work Product	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, including input from attorneys relating to proposed redistricting legislation .	**WITHHOLD.** LP2.
369	DOC_0001996	Senator Joan Huffman	DOCX	Sarah Willcox	10/3/2021					Legislative; Attorney Client; Work Product	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
370	DOC_0001997	Senator Joan Huffman	DOCX	Sarah Willcox	10/1/2021					Legislative; Attorney Client; Work Product	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, including input from attorneys relating to proposed redistricting legislation	**WITHHOLD.** LP2.
371	DOC_0001998	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	10/5/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	**WITHHOLD.** LP2.

Entry	Control Number	Custodian	File Extension	Author (s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
372	DOC_0001999	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	10/1/2021					Legislative; Attorney Client; Work Product	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, including input from attorneys relating to proposed redistricting legislation	**WITHHOLD.** LP2.
373	DOC_0002001	Senator Joan Huffman	DOCX	Sarah Willcox	9/21/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	**WITHHOLD.** LP2.
374	DOC_0002002	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	9/22/2021					Legislative; Attorney Client; Work Product	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
375	DOC_0002004	Senator Joan Huffman	DOCX	Sarah WIllcox	9/21/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	**WITHHOLD.** LP2.
376	DOC_0002005	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	9/24/2021					Legislative; Attorney Client; Work Product	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
377	DOC_0002006	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	9/27/2021					Legislative; Attorney Client; Work Product	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
378	DOC_0002007	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	9/28/2021					Legislative; Attorney Client; Work Product	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
379	DOC_0002008	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	9/27/2021					Legislative; Attorney Client; Work Product	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
380	DOC_0002009	Senator Joan Huffman	PDF		10/1/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	**WITHHOLD.** LP1.
381	DOC_0002011	Senator Joan Huffman	DOCX	Sarah Willcox	9/29/2021					Legislative; Attorney Client; Work Product	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
382	DOC_0002012	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	9/29/2021					Legislative; Attorney Client; Work Product	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
383	DOC_0002013	Senator Joan Huffman	PDF		10/12/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	**WITHHOLD.** LP1.
384	DOC_0002014	Senator Joan Huffman	PDF	State of Texas	10/13/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	**WITHHOLD.** LP1.
385	DOC_0002015	Senator Joan Huffman	DOCX	SO	10/13/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	**WITHHOLD.** LP1.
386	DOC_0002016	Senator Joan Huffman	PDF		10/13/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	**WITHHOLD.** LP1.

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Entry	Control Number	Custodian	File Extension	Author (s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
387	DOC_0002017	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	10/12/2021					Legislative	Confidential draft talking points for committee or Senate floor regarding draft redistricting legislation, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
388	DOC_0002018	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	10/12/2021					Legislative	Confidential draft talking points for committee or Senate floor regarding draft redistricting legislation, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
389	DOC_0002019	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	10/14/2021					Legislative	Confidential draft talking points for committee or Senate floor regarding draft redistricting legislation, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
390	DOC_0002020	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	10/14/2021					Legislative	Confidential draft talking points for committee or Senate floor regarding draft redistricting legislation, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
391	DOC_0002021	Senator Joan Huffman	PDF		10/14/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	**WITHHOLD.** LP1.
392	DOC_0002022	Senator Joan Huffman	PDF		10/13/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	**WITHHOLD.** LP1.
393	DOC_0002023	Senator Joan Huffman	DOCX	Anna Mackin (attorney)	10/12/2021					Legislative; Attorney Client; Work Product	Confidential bill draft and related materials, regarding draft redistricting legislation, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
394	DOC_0002024	Senator Joan Huffman	PDF		10/6/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	**WITHHOLD.** LP1.
395	DOC_0002025	Senator Joan Huffman	PDF							Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	**WITHHOLD.** LP1.
396	DOC_0002026	Senator Joan Huffman	PDF		10/3/2021					Legislative	Data relating to draft redistricting legislation for school board of education districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
397	DOC_0002027	Senator Joan Huffman	PDF		10/3/2021					Legislative	Data relating to draft redistricting legislation for school board of education districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
398	DOC_0002028	Senator Joan Huffman	PDF		9/18/2021					Legislative	Data relating to draft redistricting legislation for school board of education districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
399	DOC_0002029	Senator Joan Huffman	PDF		9/18/2021					Legislative	Data relating to draft redistricting legislation for school board of education districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
400	DOC_0002030	Senator Joan Huffman	PDF		9/18/2021					Legislative	Data relating to draft redistricting legislation for school board of education districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
401	DOC_0002031	Senator Joan Huffman	PDF		9/18/2021					Legislative	Data relating to draft redistricting legislation for school board of education districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
402	DOC_0002032	Senator Joan Huffman	PDF		9/18/2021					Legislative	Data relating to draft redistricting legislation for school board of education districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
403	DOC_0002033	Senator Joan Huffman	PDF		10/4/2021					Legislative	Data relating to draft redistricting legislation for school board of education districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.

Entry	Control Number	Custodian	File Extension	Author (s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
404	DOC_0002034	Senator Joan Huffman	PDF		10/4/2021					Legislative	Data relating to draft redistricting legislation for school board of education districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
405	DOC_0002035	Senator Joan Huffman	PDF		9/18/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	**WITHHOLD.** LP1.
406	DOC_0002036	Senator Joan Huffman	PDF	State of Texas	9/20/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	**WITHHOLD.** LP1.
407	DOC_0002037	Senator Joan Huffman	DOCX	SO	9/20/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	**WITHHOLD.** LP1.
408	DOC_0002038	Senator Joan Huffman	PDF		9/19/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	**WITHHOLD.** LP1.
409	DOC_0002039	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	10/1/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	**WITHHOLD.** LP2.
410	DOC_0002040	Senator Joan Huffman	PDF		9/22/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation .	**WITHHOLD.** LP1.
411	DOC_0002041	Senator Joan Huffman	REPORT)							Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	**WITHHOLD.** LP1.
412	DOC_0002042	Senator Joan Huffman	DOCX	Zachary Stephenson	10/15/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	**WITHHOLD.** LP2.
413	DOC_0002043	Senator Joan Huffman	DOCX	Anna Mackin (attorney)	10/2/2021					Legislative	Confidential draft talking points for committee of Senate floor regarding draft redistricting legislation, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
414	DOC_0002044	Senator Joan Huffman	DOCX	Anna Mackin (attorney)	10/2/2021					Legislative	Confidential draft talking points for committee of Senate floor regarding draft redistricting legislation, including input from attorneys relating to proposed redistricting legislation .	**WITHHOLD.** LP2.
415	DOC_0002045	Senator Joan Huffman	DOCX	Anna Mackin (attorney)	10/3/2021					Legislative	Confidential draft talking points for committee of Senate floor regarding draft redistricting legislation, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
416	DOC_0002046	Senator Joan Huffman	PDF	S7625AF	10/3/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	**WITHHOLD.** LP2.
417	DOC_0002047	Senator Joan Huffman	PDF		9/18/2021					Legislative	Data relating to draft redistricting legislation for state Senate districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
418	DOC_0002048	Senator Joan Huffman	PDF		9/18/2021					Legislative	Data relating to draft redistricting legislation for state Senate districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
419	DOC_0002049	Senator Joan Huffman	PDF		9/18/2021					Legislative	Data relating to draft redistricting legislation for state Senate districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
420	DOC_0002050	Senator Joan Huffman	PDF		9/18/2021					Legislative	Data relating to draft redistricting legislation for state Senate districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
421	DOC_0002051	Senator Joan Huffman	PDF		9/18/2021					Legislative	Data relating to draft redistricting legislation for state Senate districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
422	DOC_0002052	Senator Joan Huffman	PDF		9/18/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	**WITHHOLD.** LP1.
423	DOC_0002053	Senator Joan Huffman	PDF	State of Texas	9/20/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	**WITHHOLD.** LP1.

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424	DOC_0002054	Senator Joan Huffman	DOCX	SO	9/20/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	**WITHHOLD.** LP1.
425	DOC_0002055	Senator Joan Huffman	PDF		9/17/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	**WITHHOLD.** LP1.
426	DOC_0002056	Senator Joan Huffman	PDF		9/22/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	**WITHHOLD.** LP1.
427	DOC_0002057	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	9/21/2021					Legislative; Attorney Client; Work Product	Confidential bill draft and related materials, regarding draft redistricting legislation, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
428	DOC_0002058	Senator Joan Huffman	PDF		9/24/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	**WITHHOLD.** LP1.
429	DOC_0002059	Senator Joan Huffman	PDF		9/23/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	**WITHHOLD.** LP1.
430	DOC_0002060	Senator Joan Huffman	PDF		9/23/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	**WITHHOLD.** LP1.
431	DOC_0002061	Senator Joan Huffman	PDF		9/27/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	**WITHHOLD.** LP1.
433	DOC_0002063	Senator Joan Huffman	PDF		9/27/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	**WITHHOLD.** LP1.
434	DOC_0002064	Senator Joan Huffman	PDF		9/27/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	**WITHHOLD.** LP1.
435	DOC_0002065	Senator Joan Huffman	PDF	State of Texas	9/28/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	**WITHHOLD.** LP1.
436	DOC_0002066	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	10/3/2021					Legislative	Confidential draft talking points for committee of Senate floor regarding draft redistricting legislation, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
437	DOC_0002067	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	10/1/2021					Legislative	Confidential draft talking points for committee of Senate floor regarding draft redistricting legislation, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
438	DOC_0002068	Senator Joan Huffman	PDF		9/28/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	**WITHHOLD.** LP1.
439	DOC_0002069	Senator Joan Huffman	PDF		9/28/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	**WITHHOLD.** LP1.
440	DOC_0002070	Senator Joan Huffman	PDF		9/28/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	**WITHHOLD.** LP1.
441	DOC_0002071	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	9/29/2021					Legislative; Attorney Client; Work Product	Confidential bill draft and related materials, regarding draft redistricting legislation, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
442	DOC_0002072	Senator Joan Huffman	PDF							Legislative	Data relating to draft redistricting legislation for state Senate districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
443	DOC_0002073	Senator Joan Huffman	PDF		10/4/2021					Legislative	Data relating to draft redistricting legislation for state Senate districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
444	DOC_0002074	Senator Joan Huffman	PDF		10/4/2021					Legislative	Data relating to draft redistricting legislation for state Senate districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
445	DOC_0002075	Senator Joan Huffman	PDF		10/4/2021					Legislative	Data relating to draft redistricting legislation for state Senate districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.

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446	DOC_0002077	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	10/1/2021					Legislative; Attorney Client; Work Product	Confidential bill draft and related materials, regarding draft redistricting legislation, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
447	DOC_0002078	Senator Joan Huffman								Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	**WITHHOLD.** LP1.
448	DOC_0002079	Senator Joan Huffman			9/30/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	**WITHHOLD.** LP1.
449	DOC_0002080	Senator Joan Huffman			9/30/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	**WITHHOLD.** LP1.
450	DOC_0002081	Senator Joan Huffman	PDF		10/1/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	**WITHHOLD.** LP1.
451	DOC_0002082	Senator Joan Huffman	PDF		10/1/2021					Legislative	Data relating to draft redistricting legislation for state Senate districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
452	DOC_0002083	Senator Joan Huffman	PDF		10/1/2021					Legislative	Data relating to draft redistricting legislation for state Senate districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
453	DOC_0002084	Senator Joan Huffman	PDF		10/1/2021					Legislative	Data relating to draft redistricting legislation for state Senate districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
454	DOC_0002085	Senator Joan Huffman	PDF		10/1/2021					Legislative	Data relating to draft redistricting legislation for state Senate districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
455	DOC_0002086	Senator Joan Huffman	PDF		10/1/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	**WITHHOLD.** LP1.
456	DOC_0002087	Senator Joan Huffman								Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	**WITHHOLD.** LP1.
457	DOC_0002088	Senator Joan Huffman			10/4/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	**WITHHOLD.** LP1.
458	DOC_0002094	Senator Joan Huffman	PDF		12/3/2020					Legislative	Confidential bill draft and related materials regarding school board of education maps, regarding draft redistricting legislation .	**WITHHOLD.** LP1.
459	DOC_0002097	Senator Joan Huffman	PDF		8/4/2020					Legislative	Confidential bill draft and related materials regarding school board of education maps, regarding draft redistricting legislation.	**WITHHOLD.** LP1.
460	DOC_0002103	Senator Joan Huffman	PDF		8/4/2020					Legislative	Confidential bill draft and related materials regarding school board of education maps, regarding draft redistricting legislation.	**WITHHOLD.** LP1.
461	DOC_0002117	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/6/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	**WITHHOLD.** LP2.
462	DOC_0002118	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/13/2021					Legislative; Attorney Client; Work Product	Confidential bill draft and related materials, regarding draft redistricting legislation, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
463	DOC_0002119	Senator Joan Huffman	DOCX		1/13/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	**WITHHOLD.** LP1.
464	DOC_0002120	Senator Joan Huffman	DOCX		1/11/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	**WITHHOLD.** LP1.
465	DOC_0002121	Senator Joan Huffman	PDF		1/11/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	**WITHHOLD.** LP1.
466	DOC_0002120	Senator Joan Huffman	DOCX		1/13/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	**WITHHOLD.** LP1.
467	DOC_0002123	Senator Joan Huffman	DOCX		1/13/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	**WITHHOLD.** LP1.

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468	DOC_0002124	Senator Joan Huffman	DOCX		1/13/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	**WITHHOLD.** LP1.
469	DOC_0002127	Senator Joan Huffman	DOCX		8/30/2021					Legislative	Confidential draft calendar entries and proposed schedule for legislative redistricting process.	**WITHHOLD.** LP2.
470	DOC_0002128	Senator Joan Huffman	DOCX		8/26/2021					Legislative	Confidential draft calendar entries and proposed schedule for legislative redistricting process.	**WITHHOLD.** LP2.
471	DOC_0002129	Senator Joan Huffman	DOCX		8/26/2021					Legislative	Confidential draft calendar entries and proposed schedule for legislative redistricting process.	**WITHHOLD.** LP2.
472	DOC_0002130	Senator Joan Huffman	DOCX		9/2/2021					Legislative	Confidential draft calendar entries and proposed schedule for legislative redistricting process.	**WITHHOLD.** LP2.
474	DOC_0002132	Senator Joan Huffman	DOCX		9/16/2021					Legislative	Confidential draft calendar entries and proposed schedule for legislative redistricting process.	**WITHHOLD.** LP2.
475	DOC_0002133	Senator Joan Huffman	DOCX		9/20/2021					Legislative	Confidential draft calendar entries and proposed schedule for legislative redistricting process.	**WITHHOLD.** LP2.
476	DOC_0002134	Senator Joan Huffman	DOCX		8/30/3021					Legislative	Confidential draft calendar entries and proposed schedule for legislative redistricting process.	**WITHHOLD.** LP2.
477	DOC_0002135	Senator Joan Huffman	DOCX		10/6/2021					Legislative	Confidential draft calendar entries and proposed schedule for legislative redistricting process.	**WITHHOLD.** LP2.
478	DOC_0002140	Senator Joan Huffman	DOCX	Anna Mackin (attorney)	10/16/2021					Legislative	Data relating to draft redistricting legislation for congressional districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
479	DOC_0002141	Senator Joan Huffman	DOCX	Anna Mackin (attorney)	8/31/2021					Legislative	Data relating to draft redistricting legislation for congression al districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
480	DOC_0002142	Senator Joan Huffman	DOCX	Anna Mackin (attorney)	8/18/2021					Legislative	Data relating to draft redistricting legislation for congressional districts, created, received, and/or gathered for the purpose of working on redistricting legislation .	**WITHHOLD.** LP2.
481	DOC_0002143	Senator Joan Huffman	DOCX	Anna Mackin (attorney)	8/31/2021					Legislative	Data relating to draft redistricting legislation for state board of education districts, created, received, and/or gathered for the purpose of working on redistricting legislation .	**WITHHOLD.** LP2.
482	DOC_0002144	Senator Joan Huffman	DOCX	Anna Mackin (attorney)	10/5/2021					Legislative	Data relating to draft redistricting legislation for state board of education districts, created, received, and/or gathered for the purpose of working on redistricting legislation .	**WITHHOLD.** LP2.
483	DOC_0002145	Senator Joan Huffman	DOCX	Anna Mackin (attorney)	8/30/2021					Legislative	Data relating to draft redistricting legislation for state senate districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
484	DOC_0002146	Senator Joan Huffman	DOCX	Anna Mackin (attorney)	10/5/2021					Legislative	Data relating to draft redistricting legislation for state senate districts, created, received, and/or gathered for the purpose of working on redistricting legislation .	**WITHHOLD.** LP2.
485	DOC_0002278	Senator Joan Huffman	XLS							Legislative	Data relating to draft redistricting legislation for state senate districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
487	DOC_0002307	Senator Joan Huffman	XLSX	Kurt Gore	12/15/2020					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
489	DOC_0002351	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	2/28/2020					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	**WITHHOLD.** LP2.
490	DOC_0002357	Senator Joan Huffman	DOCX	Ashley Brooks	1/18/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	**WITHHOLD.** LP2.

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491	DOC_0002362	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/18/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	**WITHHOLD.** LP2.
492	DOC_0002363	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/7/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	**WITHHOLD.** LP2.
493	DOC_0002367	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/7/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	**WITHHOLD.** LP2.
494	DOC_0002374	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/18/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	**WITHHOLD.** LP2.
495	DOC_0002381	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/26/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	**WITHHOLD.** LP2.
496	DOC_0002390	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/27/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	**WITHHOLD.** LP2.
497	DOC_0002391	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/27/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	**WITHHOLD.** LP2.
498	DOC_0002399	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/28/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	**WITHHOLD.** LP2.
499	DOC_0002400	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/22/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	**WITHHOLD.** LP2.
500	DOC_0002405	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	2/12/2021					LEgislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	**WITHHOLD.** LP2.
501	DOC_0002406	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	2/10/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	**WITHHOLD.** LP2.
502	DOC_0002407	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/22/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	**WITHHOLD.** LP2.
503	DOC_0002409	Senator Joan Huffman	PDF		2/5/2021					Legislative; Attorney Client; Work Product	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
505	DOC_0002414	Senator Joan Huffman	XLSX	Anna Mackin (attorney)	2/11/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	**WITHHOLD.** LP2.
506	DOC_0002415	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/22/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	**WITHHOLD.** LP2.
507	DOC_0002416	Senator Joan Huffman	PDF		1/25/2021					Legislative; Attorney Client; Work Product	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
509	DOC_0002420	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	2/1/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	**WITHHOLD.** LP2.
510	DOC_0002421	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	2/1/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	**WITHHOLD.** LP2.

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511	DOC_0002425	Senator Joan Huffman	XLSX	Anna Mackin (attorney)	2/2/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	**WITHHOLD.** LP2.
512	DOC_0002426	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	2/2/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	**WITHHOLD.** LP2.
513	DOC_0002427	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/22/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	**WITHHOLD.** LP2.
514	DOC_0002428	Senator Joan Huffman	PDF		1/26/2021					Legislative; Attorney Client; Work Product	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
516	DOC_0002435	Senator Joan Huffman	XLSX	Anna Mackin (Attorney)	2/3/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	**WITHHOLD.** LP2.
517	DOC_0002436	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	2/2/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	**WITHHOLD.** LP2.
518	DOC_0002437	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/22/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	**WITHHOLD.** LP2.
519	DOC_0002438	Senator Joan Huffman	PDF		1/26/2021					Legislative; Attorney Client; Work Product	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
521	DOC_0002445	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	2/12/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	**WITHHOLD.** LP2.
522	DOC_0002446	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/22/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	**WITHHOLD.** LP2.
523	DOC_0002448	Senator Joan Huffman	PDF		2/5/2021					Legislative; Attorney Client; Work Product	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
525	DOC_0002454	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	2/12/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	**WITHHOLD.** LP2.
526	DOC_0002455	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/22/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	**WITHHOLD.** LP2.
527	DOC_0002456	Senator Joan Huffman	PDF		2/5/2021					Legislative; Attorney Client; Work Product	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
528	DOC_0002458	Senator Joan Huffman	PPTX	Alelhie Lila Valencia	6/30/2016					Legislative	Confidential materials used to prepare for legislative redistricting hearing, includingscripts, talking points, data, and other materials.	**WITHHOLD.** LP2.
529	DOC_0002462	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	2/12/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	**WITHHOLD.** LP2.
530	DOC_0002463	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/22/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	**WITHHOLD.** LP2.

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532	DOC_0002466	Senator Joan Huffman	DOCX	Anna Mackin (attorney)	3/13/2021					Legislative; Attorney Client; Work Product	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
533	DOC_0002480	Senator Joan Huffman	PDF		12/31/2019					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	**WITHHOLD.** LP1.
534	DOC_0002481	Senator Joan Huffman	PDF		12/30/2019					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, including input from attorneys relating to proposed redistricting legislation .	**WITHHOLD.** LP1.
535	DOC_0002482	Senator Joan Huffman	PDF		12/30/2019					Legislative; Attorney Client; Work Product	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
536	DOC_0002483	Senator Joan Huffman	PDF		12/31/2019					Legislative; Attorney Client; Work Product	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, including input from attorneys relating to proposed redistricting legislation .	**WITHHOLD.** LP2.
537	DOC_0002487	Senator Joan Huffman	PDF		5/15/2020					Legislative; Attorney Client; Work Product	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
538	DOC_0002488	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	10/7/2019					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	**WITHHOLD.** LP2.
539	DOC_0002494	Senator Joan Huffman	PPTX	Lloyd Potter	1/22/2010					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	**WITHHOLD.** LP2.
540	DOC_0002500	Senator Joan Huffman	PDF		2/25/2020					Legislative; Attorney Client; Work Product	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
541	DOC_0002505	Senator Joan Huffman	PDF		1/25/2021					Legislative; Attorney Client; Work Product	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
542	DOC_0002506	Senator Joan Huffman	PDF		1/26/2020					Legislative; Attorney Client; Work Product	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
544	DOC_0002508	Senator Joan Huffman	PDF		1/19/2020					Legislative; Attorney Client; Work Product	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
545	DOC_0002514	Senator Joan Huffman	XLSX	Sean Opperman (attorney)	1/24/2020					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	**WITHHOLD.** LP2.
546	DOC_0002516	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	1/6/2020					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	**WITHHOLD.** LP2.

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547	DOC_0002521	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	8/31/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	**WITHHOLD.** LP2.
548	DOC_0002522	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	8/31/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	**WITHHOLD.** LP2.
549	DOC_0002524	Senator Joan Huffman	DOCX	Anna Mackin (attorney)	8/11/2021					Legislative; Attorney Client; Work Product	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, including input from attorneys relating to proposed redistricting legislation.	**WITHHOLD.** LP2.
550	DOC_0002525	Senator Joan Huffman	DOCX	Anna Mackin (attorney)	8/20/2021					Legislative; Attorney Client; Work Product	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	**WITHHOLD.** LP2.
551	DOC_0002526	Senator Joan Huffman	XLSX	Anna Mackin (attorney)	9/10/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	**WITHHOLD.** LP2.
552	DOC_0002527	Senator Joan Huffman	XLSX	Anna Mackin (attorney)	9/10/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	**WITHHOLD.** LP2.
553	DOC_0002528	Senator Joan Huffman	XLSX	Sean Opperman (attorney)	9/10/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	**WITHHOLD.** LP2.
554	DOC_0002529	Senator Joan Huffman	XLSX	Anna Mackin (attorney)	9/11/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	**WITHHOLD.** LP2.
555	DOC_0002530	Senator Joan Huffman	XLSX	Anna Mackin (attorney)	9/11/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	**WITHHOLD.** LP2.
556	DOC_0002531	Senator Joan Huffman	XLSX	Sean Opperman (attorney)	9/11/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	**WITHHOLD.** LP2.
557	DOC_0002532	Senator Joan Huffman	XLSX	Anna Mackin (attorney)	9/7/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	**WITHHOLD.** LP2.
558	DOC_0002533	Senator Joan Huffman	XLSX	Anna Mackin (attorney)	9/7/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	**WITHHOLD.** LP2.
559	DOC_0002536	Senator Joan Huffman	XLSX	Anna Mackin (attorney)	9/8/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	**WITHHOLD.** LP2.
560	DOC_0002537	Senator Joan Huffman	XLSX	Anna Mackin (attorney)	9/10/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	**WITHHOLD.** LP2.
561	DOC_0002539	Senator Joan Huffman	XLSX	Sean Opperman (attorney)	9/8/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	**WITHHOLD.** LP2.
562	DOC_0002541	Senator Joan Huffman	XLSX	Sean Opperman (attorney)	9/9/2021					Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials.	**WITHHOLD.** LP2.
563	DOC_0002547	Senator Joan Huffman	DOCX	Ashley Brooks	1/14/2020					Legislative; Attorney Client	Confidential letter relating to request for legal representation in connection with redistricting legislation.	**WITHHOLD.** LP2.
564	DOC_0002548	Senator Joan Huffman	PDF		1/21/2020					Legislative; Attorney Client	Confidential letter relating to request for legal representation in connection with redistricting legislation.	**WITHHOLD.** LP2.
565	DOC_0002549	Senator Joan Huffman	PDF		4/26/2021					Legislative; Attorney Client	Confidential letter relating to request for legal representation in connection with redistricting legislation.	**WITHHOLD.** LP2.

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566	DOC_0002550	Senator Joan Huffman	PDF		9/14/2021					Legislative; Attorney Client	Confidential contract for the retention of expert services and related materials, sought for the purpose of providing expert consultation to aid in drafting and considering redistricting legislation.	**WITHHOLD.** LP2.
567	DOC_0002551	Senator Joan Huffman	DOCX	ATC	8/31/2021					Legislative; Attorney Client	Confidential contract for the retention of expert services and related materials, sought for the purpose of providing expert consultation to aid in drafting and considering redistricting legislation.	**WITHHOLD.** LP2.
568	DOC_0002552	Senator Joan Huffman	DOCX	ATC	8/31/2021					Legislative; Attorney Client	Confidential contract for the retention of expert services and related materials, sought for the purpose of providing expert consultation to aid in drafting and considering redistricting legislation.	**WITHHOLD.** LP2.
569	DOC_0002553	Senator Joan Huffman	DOCX	ATC	8/31/2021					Legislative; Attorney Client	Confidential contract for the retention of expert services and related materials, sought for the purpose of providing expert consultation to aid in drafting and considering redistricting legislation.	**WITHHOLD.** LP2.
570	DOC_0002554	Senator Joan Huffman	DOCX	ATC	9/8/2021					Legislative; Attorney Client	Confidential contract for the retention of expert services and related materials, sought for the purpose of providing expert consultation to aid in drafting and considering redistricting legislation.	**WITHHOLD.** LP2.
571	DOC_0002555	Senator Joan Huffman	PDF	ATC	9/8/2021					Legislative; Attorney Client; Work Product	Confidential contract for the retention of expert services and related materials, sought for the purpose of providing expert consultation to aid in drafting and considering redistricting legislation.	**WITHHOLD.** LP2.
572	DOC_0002556	Senator Joan Huffman	DOCX	ATC	9/7/2021					Legislative; Attorney Client	Confidential contract for the retention of expert services and related materials, sought for the purpose of providing expert consultation to aid in drafting and considering redistricting legislation.	**WITHHOLD.** LP2.
573	DOC_0002557	Senator Joan Huffman	PDF		9/9/2021					Legislative; Attorney Client; Work Product	Confidential contract for the retention of expert services and related materials, sought for the purpose of providing expert consultation to aid in drafting and considering redistricting legislation.	**WITHHOLD.** LP2.
574	DOC_0002558	Senator Joan Huffman	XLSX	Sean opperman (attorney)	3/29/2019					Legislative; Attorney Client	Confidential invoice relating to expert services, sought for the purpose of providing expert consultation to aid in drafting and considering redistricting legislation.	**WITHHOLD.** LP2.
575	DOC_0002559	Senator Joan Huffman	PDF		4/13/2021					Legislative; Attorney Client; Work Product	Confidential contract for the retention of outside legal counsel, sought for the purpose of receiving legal advice in connection with redistricting	**WITHHOLD.** LP2.
576	DOC_0002560	Senator Joan Huffman	PDF		4/13/2021					Legislative; Attorney Client; Work Product	Confidential contract for the retention of outside legal counsel, sought for the purpose of receiving legal advice in connection with redistricting	**WITHHOLD.** LP2.
577	DOC_0002561	Senator Joan Huffman	XLSX	Anna Mackin (attorney)	6/7/2021					Legislative; Attorney Client	Confidential invoice relating to outside legal counsel, sought for the purpose of receiving legal advice in connection with redistricting legislation.	**WITHHOLD.** LP2.
578	DOC_0002562	Senator Joan Huffman	PDF		7/22/2021					Legislative; Attorney Client; Work Product	Confidential invoice relating to outside legal counsel, sought for the pupose of receiving legal advice in connection with redistricting legislation.	**WITHHOLD.** LP2.
579	DOC_0002563	Senator Joan Huffman	PDF		8/12/2021					Legislative; Attorney Client; Work Product	Confidential invoice relating to outside legal counsel, sought for the purpose of receiving legal advice in connection with redistricting legislation.	**WITHHOLD.** LP2.
580	DOC_0002564	Senator Joan Huffman	PDF		10/7/2021					Legislative; Attorney Client; Work Product	Confidential invoice relating to outside legal counsel, sought for the pupose of receiving legal advice in connection with redistricting legislation.	**WITHHOLD.** LP2.
581	DOC_0002565	Senator Joan Huffman	PDF		8/5/2021					Legislative; Attorney Client; Work Product	Confidential invoice relating to outside legal counsel, sought for the purpose of receiving legal advice in connection with redistricting legislation.	**WITHHOLD.** LP2.
582	DOC_0002566	Senator Joan Huffman	PDF		6/8/2021					Legislative; Attorney Client; Work Product	Confidential invoice relating to outside legal counsel, sought for the purpose of receiving legal advice in connection with redistricting legislation.	**WITHHOLD.** LP2.

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583	DOC_0002567	Senator Joan Huffman	PDF		8/12/2021					Legislative; Attorney Client; Work Product	Confidential invoice relating to outside legal counsel, sought for the purpose of receiving legal advice in connection with redistricting legislation.	**WITHHOLD.** LP2.
584	DOC_0002568	Senator Joan Huffman	PDF		8/5/2021					Legislative; Attorney Client; Work Product	Confidential invoice relating to outside legal counsel, sought for the purpose of receiving legal advice in connection with redistricting legislation.	**WITHHOLD.** LP2.
586	DOC_0002578	Senator Joan Huffman	PDF	JSA	3/26/2021					Legislative; Attorney Client; Work Product	Confidential memorandum from Texas Legislative Council to members of the legislature relating to redstricting materials.	**WITHHOLD.** LP2.
587	DOC_0002581	Senator Joan Huffman	DOCX	Ashley Brooks	3/3/2020					Legislative	Confidential draft of communication to congressman, senator, or state board of education member who lives in district where regional hearing will be conducted.	**WITHHOLD.** LP2.
588	DOC_0002582	Senator Joan Huffman	DOCX	Ashley Brooks	1/10/2020					Legislative	Confidential draft of communication to congressman, senator, or state board of education member who lives in district where regional hearing will be conducted.	**WITHHOLD.** LP2.
589	DOC_0002583	Senator Joan Huffman	DOCX	Ashley Brooks	3/3/2020					Legislative	Confidential draft of communication to congressman, senator, or state board of education member who lives in district where regional hearing will be conducted.	**WITHHOLD.** LP2.
590	DOC_0002586	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	8/12/2021					Legislative	Confidential draft communication to congressmen regarding draft redistricting legislation.	**WITHHOLD.** LP2.
591	DOC_0002588	Senator Joan Huffman	DOCX	Ashley Brooks	8/23/2021					Legislative	Confidential draft communication to congressmen regarding draft redistricting legislation.	**WITHHOLD.** LP2.
593	DOC_0002611	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	8/12/2021	Members of the State Board of Education	Senator Joan Huffman			Legislative	Confidential communication from Senator Huffman to members of the State Board of Education regarding draft redistricting legislation.	**WITHHOLD.** LP1.
594	DOC_0002612	Senator Joan Huffman	PDF	Sean Opperman (attorney)	8/12/2021	Members of the State Board of Education	Senator Joan Huffman			Legislative	Confidential communication from Senator Huffman to members of the State Board of Education regarding draft redistricting legislation.	**WITHHOLD.** LP1.
595	DOC_0002613	Senator Joan Huffman	DOCX	Ashley Brooks	8/23/2021	Members of the State Board of Education	Senator Joan Huffman			Legislative	Confidential communication from Senator Huffman to members of the State Board of Education regarding draft redistricting legislation.	**WITHHOLD.** LP1.
609	DOC_0002660	Senator Joan Huffman	PDF		10/9/2019					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
610	DOC_0002661	Senator Joan Huffman	PDF		12/6/2019					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation .	**WITHHOLD.** LP1.
611	DOC_0002662	Senator Joan Huffman	PDF		12/6/2019					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
612	DOC_0002663	Senator Joan Huffman	PDF		12/6/2019					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
613	DOC_0002664	Senator Joan Huffman	PDF		12/6/2019					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
614	DOC_0002665	Senator Joan Huffman	PDF		12/6/2019					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
615	DOC_0002666	Senator Joan Huffman	PDF		12/6/2019					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
616	DOC_0002667	Senator Joan Huffman	PDF		12/6/2019					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.

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617	DOC_0002668	Senator Joan Huffman	PDF		12/6/2019					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
618	DOC_0002669	Senator Joan Huffman	PDF		12/6/2019					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
619	DOC_0002670	Senator Joan Huffman	PDF		12/6/2019					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
620	DOC_0002671	Senator Joan Huffman	PDF		12/6/2019					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
621	DOC_0002672	Senator Joan Huffman	PDF		12/6/2019					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
622	DOC_0002673	Senator Joan Huffman	PDF		12/6/2019					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
623	DOC_0002674	Senator Joan Huffman	PDF		12/6/2019					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
624	DOC_0002675	Senator Joan Huffman	PDF		12/6/2019					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
625	DOC_0002676	Senator Joan Huffman	PDF		12/6/2019					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
626	DOC_0002677	Senator Joan Huffman	PDF		12/6/2019					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
627	DOC_0002678	Senator Joan Huffman	PDF		12/6/2019					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
628	DOC_0002679	Senator Joan Huffman	PDF		12/6/2019					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
629	DOC_0002680	Senator Joan Huffman	PDF		12/6/2019					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
630	DOC_0002671	Senator Joan Huffman	PDF		12/6/2019					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
631	DOC_0002682	Senator Joan Huffman	PDF		12/6/2019					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
632	DOC_0002683	Senator Joan Huffman	PDF		12/6/2019					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
633	DOC_0002684	Senator Joan Huffman	PDF		12/6/2019					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
634	DOC_0002685	Senator Joan Huffman	PDF		12/6/2019					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
635	DOC_0002686	Senator Joan Huffman	PDF		12/6/2019					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
636	DOC_0002687	Senator Joan Huffman	PDF		12/6/2019					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.

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637	DOC_0002688	Senator Joan Huffman	PDF		12/6/2019					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
638	DOC_0002689	Senator Joan Huffman	PDF		12/6/2019					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
639	DOC_0002690	Senator Joan Huffman	PDF		12/6/2019					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
640	DOC_0002691	Senator Joan Huffman	PDF		12/6/2019					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
641	DOC_0002692	Senator Joan Huffman	PDF		10/3/2019					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
642	DOC_0002693	Senator Joan Huffman	PDF		9/30/2019					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
643	DOC_0002694	Senator Joan Huffman	PDF		10/2/2019					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
644	DOC_0002695	Senator Joan Huffman	PDF		10/1/2019					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
645	DOC_0002696	Senator Joan Huffman	PDF		10/3/2019					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
646	DOC_0002697	Senator Joan Huffman	PDF		10/1/2019					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
647	DOC_0002700	Senator Joan Huffman	XLSX	KAG	2/20/2015					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
648	DOC_0002712	Senator Joan Huffman	PDF	Alelhie Lila Valencia	9/25/2020					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
649	DOC_0002713	Senator Joan Huffman	PDF	Alelhie Lila Valencia	9/25/2020					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
650	DOC_0002714	Senator Joan Huffman	PDF	Alelhie Lila Valencia	9/25/2020					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
651	DOC_0002715	Senator Joan Huffman	PDF	Alelhie Lila Valencia	9/25/2020					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
652	DOC_0002716	Senator Joan Huffman	PDF	Alelhie Lila Valencia	9/25/2020					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
653	DOC_0002717	Senator Joan Huffman	PDF	Alelhie Lila Valencia	9/25/2020					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
654	DOC_0002718	Senator Joan Huffman	PDF	Alelhie Lila Valencia	9/25/2020					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
655	DOC_0002719	Senator Joan Huffman	PDF	Alelhie Lila Valencia	9/25/2020					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
656	DOC_0002720	Senator Joan Huffman	PDF	Alelhie Lila Valencia	9/25/2020					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.

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657	DOC_0002721	Senator Joan Huffman	PDF	Alelhie Lila Valencia	9/25/2020					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
658	DOC_0002723	Senator Joan Huffman	PDF	Alelhie Lila Valencia	9/25/2020					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
659	DOC_0002724	Senator Joan Huffman	PDF	Alelhie Lila Valencia	9/25/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
660	DOC_0002725	Senator Joan Huffman	PDF	Alelhie Lila Valencia	9/25/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
661	DOC_0002726	Senator Joan Huffman	PDF	Alelhie Lila Valencia	9/25/2020					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
662	DOC_0002727	Senator Joan Huffman	PDF	Alelhie Lila Valencia	9/25/2020					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation .	**WITHHOLD.** LP2.
663	DOC_0002728	Senator Joan Huffman	PDF	Alelhie Lila Valencia	9/25/2020					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
664	DOC_0002729	Senator Joan Huffman	PDF	Alelhie Lila Valencia	9/25/2020					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
665	DOC_0002730	Senator Joan Huffman	PDF	Alelhie Lila Valencia	9/25/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
666	DOC_0002731	Senator Joan Huffman	PDF	Alelhie Lila Valencia	9/25/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
667	DOC_0002732	Senator Joan Huffman	PDF	Alelhie Lila Valencia	9/25/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
668	DOC_0002733	Senator Joan Huffman	PDF	Alelhie Lila Valencia	9/25/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
669	DOC_0002734	Senator Joan Huffman	PDF	Alelhie Lila Valencia	9/25/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
670	DOC_0002735	Senator Joan Huffman	PDF	Alelhie Lila Valencia	9/25/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
671	DOC_0002736	Senator Joan Huffman	PDF	Alelhie Lila Valencia	9/25/2020					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
672	DOC_0002737	Senator Joan Huffman	PDF	Alelhie Lila Valencia	9/25/2020					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
673	DOC_0002738	Senator Joan Huffman	PDF	Alelhie Lila Valencia	9/25/2020					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
674	DOC_0002739	Senator Joan Huffman	PDF	Alelhie Lila Valencia	9/25/2020					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
675	DOC_0002740	Senator Joan Huffman	PDF	Alelhie Lila Valencia	9/25/2020					Legislative	Data relating to draft redistricting created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
676	DOC_0002741	Senator Joan Huffman	PDF	Alelhie Lila Valencia	9/25/2020					Legislative	Data relating to draft redistricting created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.

Entry	Control Number	Custodian	File Extension	Author (s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
677	DOC_0002742	Senator Joan Huffman	PDF	Alelhie Lila Valencia	9/25/2020					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
678	DOC_0002743	Senator Joan Huffman	PDF	Alelhie Lila Valencia	9/25/2020					Legislative	Data relating to draft redistricting legislation, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
681	DOC_0002747	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	9/9/2021					Legislative	Confidential notes regarding draft redistricting legislation and senate districts, summarizing requests made by members.	**WITHHOLD.** LP2.
682	DOC_0002748	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	9/10/2021					Legislative	Data relating to draft redistricting legislation for the state senate districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
683	DOC_0002749	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	9/10/2021					Legislative; Attorney Client; Work Product	Confidential outline of confidential meetings to take place to discuss draft redistricting legislation as to state senate districts.	**WITHHOLD.** LP2.
684	DOC_0002750	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	9/4/2021					Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
685	DOC_0004217	Senator Joan Huffman	PDF		9/29/2021					Legislative	Confidential draft maps and data relating to draft redistricting legislation for the state senate	**WITHHOLD.** LP1.
686	DOC_0004218	Senator Joan Huffman	PDF		10/5/2021					Legislative	Confidential draft maps and data relating to draft redistricting legislation for the state senate	**WITHHOLD.** LP1.
687	DOC_0004219	Senator Joan Huffman	PDF		9/29/2021					Legislative	Confidential draft maps and data relating to draft redistricting legislation for the state senate	**WITHHOLD.** LP1.
689	DOC_0006664	Senator Joan Huffman	PDF		5/7/2020					Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
690	DOC_0006677	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
691	DOC_0006678	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
692	DOC_0006679	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
693	DOC_0006680	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
694	DOC_0006681	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
695	DOC_0006682	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
696	DOC_0006683	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
697	DOC_0006684	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
698	DOC_0006685	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
699	DOC_0006686	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
701	DOC_0006688	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
702	DOC_0006689	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
703	DOC_0006690	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
704	DOC_0006691	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
705	DOC_0006692	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
706	DOC_0006693	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.

Entry	Control Number	Custodian	File Extension	Author (s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
707	DOC_0006694	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
708	DOC_0006695	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
709	DOC_0006696	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
710	DOC_0006697	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
711	DOC_0006698	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
712	DOC_0006699	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
713	DOC_0006700	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
714	DOC_0006701	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
715	DOC_0006702	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
716	DOC_0006703	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
717	DOC_0006704	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
718	DOC_0006705	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
719	DOC_0006706	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
720	DOC_0006707	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
721	DOC_0006708	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
722	DOC_0006709	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
723	DOC_0006710	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
724	DOC_0006711	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
725	DOC_0006712	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
726	DOC_0006713	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
727	DOC_0006714	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
728	DOC_0006715	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
729	DOC_0006716	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
730	DOC_0006717	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
731	DOC_0006718	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
732	DOC_0006719	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
733	DOC_0006720	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
734	DOC_0006721	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
735	DOC_0006722	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.

Entry	Control Number	Custodian	File Extension	Author (s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
736	DOC_0006723	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
737	DOC_0006724	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
738	DOC_0006725	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
739	DOC_0006726	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
740	DOC_0006727	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
741	DOC_0006728	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
742	DOC_0006729	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
743	DOC_0006730	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
744	DOC_0006731	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
745	DOC_0006732	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
746	DOC_0006733	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
747	DOC_0006734	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
748	DOC_0006735	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
749	DOC_0006736	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
750	DOC_0006737	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
751	DOC_0006738	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
752	DOC_0006739	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
753	DOC_0006740	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
754	DOC_0006741	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
755	DOC_0006742	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
756	DOC_0006743	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
757	DOC_0006744	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
758	DOC_0006745	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
759	DOC_0006746	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
760	DOC_0006747	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
761	DOC_0006748	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
762	DOC_0006749	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
763	DOC_0006750	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
764	DOC_0006751	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.

Entry	Control Number	Custodian	File Extension	Author (s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
765	DOC_0006752	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
766	DOC_0006753	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
767	DOC_0006754	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
768	DOC_0006755	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
769	DOC_0006756	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
770	DOC_0006757	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
771	DOC_0006758	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
772	DOC_0006759	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
773	DOC_0006760	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
774	DOC_0006761	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
775	DOC_0006762	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
776	DOC_0006763	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
777	DOC_0006764	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
778	DOC_0006765	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
779	DOC_0006766	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
780	DOC_0006801	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
781	DOC_0006814	Senator Joan Huffman	ICS							Legislative	Confidential calendar entry relating to draft redistricting legislation.	**WITHHOLD.** LP2.
782	DOC_0006820	Senator Joan Huffman	XLSX	Jared May	8/15/2021					Legislative	Data relating to draft redistricting legislation for state board of education districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
783	DOC_0006821	Senator Joan Huffman	XLSX	Michael Hankins	8/13/2021					Legislative	Data relating to draft redistricting legislation for state board of education districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
784	DOC_0006822	Senator Joan Huffman	PDF		8/16/2021					Legislative	Data relating to draft redistricting legislation for state board of education districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
785	DOC_0006823	Senator Joan Huffman	PDF		8/23/2021					Legislative	Data relating to draft redistricting legislation for state board of education districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
786	DOC_0006824	Senator Joan Huffman	PDF		8/23/2021					Legislative	Data relating to draft redistricting legislation for state board of education districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
787	DOC_0006825	Senator Joan Huffman	PDF		8/20/2021					Legislative	Data relating to draft redistricting legislation for state board of education districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.

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Entry	Control Number	Custodian	File Extension	Author (s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
788	DOC_0006826	Senator Joan Huffman	PDF		10/19/2021					Legislative	Data relating to draft redistricting legislation for state board of education districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
789	DOC_0006827	Senator Joan Huffman	PDF		10/20/2021					Legislative	Data relating to draft redistricting legislation for state board of education districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
790	DOC_0006828	Senator Joan Huffman	PDF		10/21/2021					Legislative	Data relating to draft redistricting legislation for state board of education districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
791	DOC_0006829	Senator Joan Huffman	PDF		10/22/2021					Legislative	Data relating to draft redistricting legislation for state board of education districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
793	DOC_0006832	Senator Joan Huffman	PDF		1/21/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	**WITHHOLD.** LP1.
794	DOC_0006845	Senator Joan Huffman	PDF		10/14/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	**WITHHOLD.** LP1.
796	DOC_0006848	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	10/1/2021					Legislative	Data relating to draft redistricting legislation for congressional districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
798	DOC_0006850	Senator Joan Huffman	PDF		10/1/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation for congression al districts.	**WITHHOLD.** LP1.
799	DOC_0006851	Senator Joan Huffman	PDF		10/1/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation for congression al districts.	**WITHHOLD.** LP1.
800	DOC_0006852	Senator Joan Huffman	PDF		10/1/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation for congression al districts.	**WITHHOLD.** LP1.
801	DOC_0006853	Senator Joan Huffman	PDF		10/5/2021	Senator Jean Huffman; Representative T odd Hunter	Congresswoman Sheila Jackson Lee; Congressman Al Green	Members of the Texas Senate and Texas House		Legislative	Confidential communication from Congresswoman Sheila Jackson Lee and Congressman Al Green tp Senator Joan Huffman and Representative Todd Hunter, regarding draft redistricting legislation for congressional districts.	**WITHHOLD.** LP2.
802	DOC_0006857	Senator Joan Huffman	PDF		9/22/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation for state senate districtcs.	**WITHHOLD.** LP1.
803	DOC_0006858	Senator Joan Huffman	PDF	State of Texas	9/28/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation for state senate districtcs.	**WITHHOLD.** LP1.
804	DOC_0006859	Senator Joan Huffman	PDF		9/28/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation for state senate districtcs.	**WITHHOLD.** LP1.
805	DOC_0006860	Senator Joan Huffman	PDF		9/28/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation for state senate districtcs.	**WITHHOLD.** LP1.
806	DOC_0006861	Senator Joan Huffman	PDF		9/28/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation for state senate districtcs.	**WITHHOLD.** LP1.
807	DOC_0006862	Senator Joan Huffman	PDF		9/22/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation for state board of education districtcs.	**WITHHOLD.** LP1.
808	DOC_0006864	Senator Joan Huffman	DOCX	Sean Opperman (attorney)	9/28/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation for state board of education districtcs.	**WITHHOLD.** LP2.

Entry	Control Number	Custodian	File Extension	Author (s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
809	DOC_0006868	Senator Joan Huffman	PDF	State of Texas	10/4/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	**WITHHOLD.** LP1.
810	DOC_0006869	Senator Joan Huffman	PDF		10/4/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	**WITHHOLD.** LP1.
811	DOC_0006870	Senator Joan Huffman	PDF		10/4/2021					Legislative	Data relating to draft redistricting legislation for congressional districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
812	DOC_0006871	Senator Joan Huffman	PDF		10/4/2021					Legislative	Data relating to draft redistricting legislation for congressional districts, created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
813	DOC_0006873	Senator Joan Huffman	PDF	State of Texas	9/28/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	**WITHHOLD.** LP1.
814	DOC_0006874	Senator Joan Huffman	PDF		9/28/2021					Legislative	Confidential bill draft and related materials, regarding draft redistricting legislation.	**WITHHOLD.** LP1.
815	DOC_0006910	Senator Joan Huffman	PDF	o0600bq	1/8/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
816	DOC_0006911	Senator Joan Huffman	PDF		1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
817	DOC_0006912	Senator Joan Huffman	PDF		1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
818	DOC_0006913	Senator Joan Huffman	PDF	o0600bq	1/8/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
819	DOC_0006914	Senator Joan Huffman	PDF		1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
820	DOC_0006915	Senator Joan Huffman	PDF		1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
821	DOC_0006916	Senator Joan Huffman	PDF	o0600bq	1/8/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
822	DOC_0006917	Senator Joan Huffman	PDF		1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
823	DOC_0006918	Senator Joan Huffman	PDF		1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
824	DOC_0006919	Senator Joan Huffman	PDF	o0600bq	1/8/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
825	DOC_0006920	Senator Joan Huffman	PDF		1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
826	DOC_0006921	Senator Joan Huffman	PDF		1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
827	DOC_0006922	Senator Joan Huffman	PDF	o0600bq	1/8/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
829	DOC_0006924	Senator Joan Huffman	PDF		1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.

Entry	Control Number	Custodian	File Extension	Author (s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
830	DOC_0006925	Senator Joan Huffman	PDF	o0600bq	1/8/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
831	DOC_0006926	Senator Joan Huffman	PDF		1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
832	DOC_0006927	Senator Joan Huffman	PDF		1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
833	DOC_0006928	Senator Joan Huffman	PDF	o0600bq	1/8/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
834	DOC_0006929	Senator Joan Huffman	PDF		1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
835	DOC_0006930	Senator Joan Huffman	PDF		1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
836	DOC_0006931	Senator Joan Huffman	PDF	o0600bq	1/8/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
837	DOC_0006932	Senator Joan Huffman	PDF		1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
838	DOC_0006933	Senator Joan Huffman	PDF		1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
839	DOC_0006934	Senator Joan Huffman	PDF	o0600bq	1/8/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
840	DOC_0006935	Senator Joan Huffman	PDF		1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
841	DOC_0006936	Senator Joan Huffman	PDF		1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
842	DOC_0006937	Senator Joan Huffman	PDF	o0600bq	1/8/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
843	DOC_0006938	Senator Joan Huffman	PDF		1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
844	DOC_0006939	Senator Joan Huffman	PDF		1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
845	DOC_0006940	Senator Joan Huffman	PDF	o0600bq	1/8/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
846	DOC_0006941	Senator Joan Huffman	PDF		1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
847	DOC_0006942	Senator Joan Huffman	PDF		1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
848	DOC_0006943	Senator Joan Huffman	PDF	o0600bq	1/8/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
849	DOC_0006944	Senator Joan Huffman	PDF		1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.

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850	DOC_0006945	Senator Joan Huffman	PDF		1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
851	DOC_0006946	Senator Joan Huffman	PDF	o0600bq	1/8/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
852	DOC_0006947	Senator Joan Huffman	PDF		1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
853	DOC_0006948	Senator Joan Huffman	PDF		1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
854	DOC_0006949	Senator Joan Huffman	PDF	o0600bq	1/8/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
855	DOC_0006950	Senator Joan Huffman	PDF		1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
856	DOC_0006951	Senator Joan Huffman	PDF		1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
857	DOC_0006952	Senator Joan Huffman	PDF	o0600bq	1/8/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
858	DOC_0006953	Senator Joan Huffman	PDF		1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
859	DOC_0006954	Senator Joan Huffman	PDF		1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
860	DOC_0006955	Senator Joan Huffman	PDF	o0600bq	1/8/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
861	DOC_0006956	Senator Joan Huffman	PDF		1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
862	DOC_0006957	Senator Joan Huffman	PDF		1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
863	DOC_0006958	Senator Joan Huffman	PDF	o0600bq	1/8/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
864	DOC_0006959	Senator Joan Huffman	PDF		1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
865	DOC_0006960	Senator Joan Huffman	PDF		1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
866	DOC_0006961	Senator Joan Huffman	PDF	o0600bq	1/8/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
867	DOC_0006962	Senator Joan Huffman	PDF		1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
868	DOC_0006963	Senator Joan Huffman	PDF		1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
869	DOC_0006964	Senator Joan Huffman	PDF	o0600bq	1/8/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.

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870	DOC_0006965	Senator Joan Huffman	PDF		1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
871	DOC_0006966	Senator Joan Huffman	PDF		1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
872	DOC_0006967	Senator Joan Huffman	PDF	o0600bq	1/8/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
873	DOC_0006968	Senator Joan Huffman	PDF		1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
874	DOC_0006969	Senator Joan Huffman	PDF		1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
875	DOC_0006970	Senator Joan Huffman	PDF		1/8/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
876	DOC_0006971	Senator Joan Huffman	PDF	o0600bq	1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
877	DOC_0006972	Senator Joan Huffman	PDF		1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
878	DOC_0006973	Senator Joan Huffman	PDF	o0600bq	1/8/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
879	DOC_0006974	Senator Joan Huffman	PDF		1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
880	DOC_0006975	Senator Joan Huffman	PDF		1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
881	DOC_0006976	Senator Joan Huffman	PDF	o0600bq	1/8/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
882	DOC_0006977	Senator Joan Huffman	PDF		1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
883	DOC_0006978	Senator Joan Huffman	PDF		1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
884	DOC_0006979	Senator Joan Huffman	PDF	o0600bq	1/8/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
885	DOC_0006980	Senator Joan Huffman	PDF		1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
886	DOC_0006981	Senator Joan Huffman	PDF		1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
887	DOC_0006982	Senator Joan Huffman	PDF	o0600bq	1/8/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
888	DOC_0006983	Senator Joan Huffman	PDF		1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
889	DOC_0006984	Senator Joan Huffman	PDF		1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.

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890	DOC_0006985	Senator Joan Huffman	PDF	o0600bq	1/8/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
891	DOC_0006986	Senator Joan Huffman	PDF		1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
892	DOC_0006987	Senator Joan Huffman	PDF		1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
893	DOC_0006988	Senator Joan Huffman	PDF	o0600bq	1/8/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
894	DOC_0006989	Senator Joan Huffman	PDF		1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
895	DOC_0006990	Senator Joan Huffman	PDF		1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
896	DOC_0006991	Senator Joan Huffman	PDF	o0600bq	1/8/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
897	DOC_0006992	Senator Joan Huffman	PDF		1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
898	DOC_0006993	Senator Joan Huffman	PDF		1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
899	DOC_0006994	Senator Joan Huffman	PDF	o0600bq	1/8/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
900	DOC_0006995	Senator Joan Huffman	PDF		1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
901	DOC_0006996	Senator Joan Huffman	PDF		1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
902	DOC_0006997	Senator Joan Huffman	PDF	o0600bq	1/8/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
903	DOC_0006998	Senator Joan Huffman	PDF		1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
904	DOC_0006999	Senator Joan Huffman	PDF		1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
905	DOC_0007000	Senator Joan Huffman	PDF	o0600bq	1/8/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
906	DOC_0007001	Senator Joan Huffman	PDF		1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
907	DOC_0007002	Senator Joan Huffman	PDF		1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
908	DOC_0007003	Senator Joan Huffman	PDF		4/2/2019					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
909	DOC_0007004	Senator Joan Huffman	PDF	o0600bq	1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.

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910	DOC_0007005	Senator Joan Huffman	XLSX	KAG	2/20/2015					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
911	DOC_0007006	Senator Joan Huffman	PDF		12/31/2019					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
912	DOC_0007007	Senator Joan Huffman	PDF	o0600f0	1/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
913	DOC_0007008	Senator Joan Huffman	XLSX	KAG	2/20/2015					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
914	DOC_0007009	Senator Joan Huffman	PDF		12/31/2019					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
915	DOC_0007010	Senator Joan Huffman	PDF		12/30/2019					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
916	DOC_0007011	Senator Joan Huffman	PDF		1/19/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
917	DOC_0007012	Senator Joan Huffman	PDF		1/18/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
918	DOC_0007013	Senator Joan Huffman	PDF		1/19/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
919	DOC_0007014	Senator Joan Huffman	PDF		1/18/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
920	DOC_0007015	Senator Joan Huffman	PDF		1/19/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
921	DOC_0007016	Senator Joan Huffman	PDF		1/18/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
922	DOC_0007017	Senator Joan Huffman	PDF		1/19/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
923	DOC_0007018	Senator Joan Huffman	PDF		1/18/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
924	DOC_0007019	Senator Joan Huffman	PDF		1/19/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
925	DOC_0007020	Senator Joan Huffman	PDF		1/18/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
926	DOC_0007021	Senator Joan Huffman	PDF		1/19/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
927	DOC_0007022	Senator Joan Huffman	PDF		1/18/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
928	DOC_0007023	Senator Joan Huffman	PDF		1/19/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
929	DOC_0007024	Senator Joan Huffman	PDF		1/18/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.

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930	DOC_0007025	Senator Joan Huffman	PDF		1/19/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
931	DOC_0007026	Senator Joan Huffman	PDF		1/18/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
932	DOC_0007027	Senator Joan Huffman	PDF		1/19/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
933	DOC_0007028	Senator Joan Huffman	PDF		1/18/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
934	DOC_0007029	Senator Joan Huffman	PDF		1/19/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
935	DOC_0007030	Senator Joan Huffman	PDF		1/18/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
936	DOC_0007031	Senator Joan Huffman	PDF		1/19/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
937	DOC_0007032	Senator Joan Huffman	PDF		1/18/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
938	DOC_0007033	Senator Joan Huffman	PDF		1/19/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
939	DOC_0007034	Senator Joan Huffman	PDF		1/18/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
940	DOC_0007035	Senator Joan Huffman	PDF		1/19/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
941	DOC_0007036	Senator Joan Huffman	PDF		1/18/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
942	DOC_0007037	Senator Joan Huffman	PDF		1/19/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
943	DOC_0007038	Senator Joan Huffman	PDF		1/18/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
944	DOC_0007039	Senator Joan Huffman	PDF		1/19/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
945	DOC_0007040	Senator Joan Huffman	PDF		1/18/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
946	DOC_0007041	Senator Joan Huffman	PDF		1/19/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
947	DOC_0007042	Senator Joan Huffman	PDF		1/19/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
948	DOC_0007043	Senator Joan Huffman	PDF		1/19/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
949	DOC_0007044	Senator Joan Huffman	PDF		1/18/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.

Entry	Control Number	Custodian	File Extension	Author (s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
950	DOC_0007045	Senator Joan Huffman	PDF		1/19/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
951	DOC_0007046	Senator Joan Huffman	PDF		1/18/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
952	DOC_0007047	Senator Joan Huffman	PDF		1/19/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
953	DOC_0007048	Senator Joan Huffman	PDF		1/18/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
954	DOC_0007049	Senator Joan Huffman	PDF		1/19/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
955	DOC_0007050	Senator Joan Huffman	PDF		1/18/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
956	DOC_0007051	Senator Joan Huffman	PDF		1/19/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
957	DOC_0007052	Senator Joan Huffman	PDF		1/18/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
958	DOC_0007053	Senator Joan Huffman	PDF		1/19/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
959	DOC_0007054	Senator Joan Huffman	PDF		1/18/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
960	DOC_0007055	Senator Joan Huffman	PDF		1/19/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
961	DOC_0007056	Senator Joan Huffman	PDF		1/18/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
962	DOC_0007057	Senator Joan Huffman	PDF		1/19/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
963	DOC_0007058	Senator Joan Huffman	PDF		1/18/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
964	DOC_0007059	Senator Joan Huffman	PDF		1/19/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
965	DOC_0007060	Senator Joan Huffman	PDF		1/18/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
966	DOC_0007061	Senator Joan Huffman	PDF		1/19/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
967	DOC_0007062	Senator Joan Huffman	PDF		1/18/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
968	DOC_0007063	Senator Joan Huffman	PDF		1/19/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
969	DOC_0007064	Senator Joan Huffman	PDF		1/18/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.

Entry	Control Number	Custodian	File Extension	Author (s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
970	DOC_0007065	Senator Joan Huffman	PDF		1/19/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
971	DOC_0007066	Senator Joan Huffman	PDF		1/18/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
972	DOC_0007067	Senator Joan Huffman	PDF		1/19/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
973	DOC_0007068	Senator Joan Huffman	PDF		1/18/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
974	DOC_0007069	Senator Joan Huffman	PDF		1/19/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
975	DOC_0007070	Senator Joan Huffman	PDF		1/18/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
976	DOC_0007071	Senator Joan Huffman	PDF		1/19/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
977	DOC_0007072	Senator Joan Huffman	PDF		1/18/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
978	DOC_0007073	Senator Joan Huffman	PDF		1/18/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
979	DOC_0007074	Senator Joan Huffman	PDF		1/18/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
980	DOC_0007075	Senator Joan Huffman	PDF		1/10/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
981	DOC_0007076	Senator Joan Huffman	PDF		1/10/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
982	DOC_0007077	Senator Joan Huffman	PDF		1/18/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
983	DOC_0007078	Senator Joan Huffman	PDF		1/18/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
984	DOC_0007079	Senator Joan Huffman	PDF		1/19/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
985	DOC_0007080	Senator Joan Huffman	PDF		1/19/2021					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
986	DOC_0007081	Senator Joan Huffman	PDF		7/11/2019					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
987	DOC_0007082	Senator Joan Huffman	PDF		9/3/2019					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
988	DOC_0007083	Senator Joan Huffman	PDF		7/11/2019					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
989	DOC_0007084	Senator Joan Huffman	PDF		7/11/2019					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.

Entry	Control Number	Custodian	File Extension	Author (s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
990	DOC_0007085	Senator Joan Huffman	PDF		8/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
991	DOC_0007086	Senator Joan Huffman	PDF	ikt429	8/30/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
992	DOC_0007087	Senator Joan Huffman	PDF		8/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
993	DOC_0007088	Senator Joan Huffman	PDF	ikt429	8/30/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
994	DOC_0007089	Senator Joan Huffman	PDF		8/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
995	DOC_0007090	Senator Joan Huffman	PDF	ikt429	8/30/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
996	DOC_0007091	Senator Joan Huffman	PDF		8/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
997	DOC_0007092	Senator Joan Huffman	PDF	ikt429	8/30/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
998	DOC_0007093	Senator Joan Huffman	PDF		8/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
999	DOC_0007094	Senator Joan Huffman	PDF	ikt429	8/30/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
1000	DOC_0007095	Senator Joan Huffman	PDF		8/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
1001	DOC_0007096	Senator Joan Huffman	PDF	ikt429	8/30/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
1002	DOC_0007097	Senator Joan Huffman	PDF		8/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
1003	DOC_0007098	Senator Joan Huffman	PDF	ikt429	8/30/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
1004	DOC_0007099	Senator Joan Huffman	PDF		8/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
1005	DOC_0007100	Senator Joan Huffman	PDF	ikt429	8/30/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
1006	DOC_0007101	Senator Joan Huffman	PDF		8/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
1007	DOC_0007102	Senator Joan Huffman	PDF	ikt429	8/30/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
1008	DOC_0007103	Senator Joan Huffman	PDF		8/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
1009	DOC_0007104	Senator Joan Huffman	PDF	ikt429	8/30/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.

Entry	Control Number	Custodian	File Extension	Author (s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
1010	DOC_0007105	Senator Joan Huffman	PDF		8/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
1011	DOC_0007106	Senator Joan Huffman	PDF	ikt429	8/30/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
1012	DOC_0007107	Senator Joan Huffman	PDF		8/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
1013	DOC_0007108	Senator Joan Huffman	PDF	ikt429	8/30/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
1014	DOC_0007109	Senator Joan Huffman	PDF		8/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
1015	DOC_0007110	Senator Joan Huffman	PDF	ikt429	8/30/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
1016	DOC_0007111	Senator Joan Huffman	PDF		8/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
1017	DOC_0007112	Senator Joan Huffman	PDF	ikt429	8/30/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
1018	DOC_0007113	Senator Joan Huffman	PDF		8/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
1019	DOC_0007114	Senator Joan Huffman	PDF	ikt429	8/30/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
1020	DOC_0007115	Senator Joan Huffman	PDF		8/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
1021	DOC_0007116	Senator Joan Huffman	PDF	ikt429	8/30/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
1022	DOC_0007117	Senator Joan Huffman	PDF		8/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
1023	DOC_0007118	Senator Joan Huffman	PDF	ikt429	8/30/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
1024	DOC_0007119	Senator Joan Huffman	PDF		8/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
1025	DOC_0007120	Senator Joan Huffman	PDF	ikt429	8/30/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
1026	DOC_0007121	Senator Joan Huffman	PDF		8/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
1027	DOC_0007122	Senator Joan Huffman	PDF	ikt429	8/30/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
1028	DOC_0007123	Senator Joan Huffman	PDF		8/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
1029	DOC_0007124	Senator Joan Huffman	PDF	ikt429	8/30/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.

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1030	DOC_0007125	Senator Joan Huffman	PDF		8/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
1031	DOC_0007126	Senator Joan Huffman	PDF	ikt429	8/30/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
1032	DOC_0007127	Senator Joan Huffman	PDF		8/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
1033	DOC_0007128	Senator Joan Huffman	PDF	ikt429	8/30/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
1034	DOC_0007129	Senator Joan Huffman	PDF		8/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
1035	DOC_0007130	Senator Joan Huffman	PDF	ikt429	8/30/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
1036	DOC_0007131	Senator Joan Huffman	PDF		8/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
1037	DOC_0007132	Senator Joan Huffman	PDF	ikt429	8/30/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
1038	DOC_0007133	Senator Joan Huffman	PDF		8/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
1039	DOC_0007134	Senator Joan Huffman	PDF	ikt429	8/30/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
1040	DOC_0007135	Senator Joan Huffman	PDF		8/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
1041	DOC_0007136	Senator Joan Huffman	PDF	ikt429	8/30/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
1042	DOC_0007137	Senator Joan Huffman	PDF		8/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
1043	DOC_0007138	Senator Joan Huffman	PDF	ikt429	8/30/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
1044	DOC_0007139	Senator Joan Huffman	PDF		8/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
1045	DOC_0007140	Senator Joan Huffman	PDF	ikt429	8/30/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
1046	DOC_0007141	Senator Joan Huffman	PDF		8/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
1047	DOC_0007142	Senator Joan Huffman	PDF	ikt429	8/30/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
1048	DOC_0007143	Senator Joan Huffman	PDF		8/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
1049	DOC_0007144	Senator Joan Huffman	PDF	ikt429	8/30/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.

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1050	DOC_0007145	Senator Joan Huffman	PDF		8/28/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP1.
1051	DOC_0007146	Senator Joan Huffman	PDF	ikt429	8/30/2020					Legislative	Data relating to draft redistricting legislation created, received, and/or gathered for the purpose of working on redistricting legislation.	**WITHHOLD.** LP2.
1052	DOC_0352894	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1053	DOC_0352895	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1054	DOC_0352896	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1055	DOC_0352897	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1056	DOC_0352898	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1057	DOC_0352899	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1058	DOC_0352900	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1059	DOC_0352901	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1060	DOC_0352902	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1061	DOC_0352903	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1062	DOC_0352904	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1063	DOC_0352905	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1064	DOC_0352906	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.

Entry	Control Number	Custodian	File Extension	Author (s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
1065	DOC_0352907	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1066	DOC_0352908	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1067	DOC_0352909	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1068	DOC_0352910	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1069	DOC_0352911	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1070	DOC_0352912	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1071	DOC_0352913	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1072	DOC_0352914	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1073	DOC_0352915	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1074	DOC_0352916	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1075	DOC_0352917	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1076	DOC_0352918	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1078	DOC_0352920	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1079	DOC_0352921	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1080	DOC_0352922	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.

Entry	Control Number	Custodian	File Extension	Author (s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
1081	DOC_0352923	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1082	DOC_0352924	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1083	DOC_0352925	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1084	DOC_0352926	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1085	DOC_0352927	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1086	DOC_0352928	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1087	DOC_0352929	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1088	DOC_0352930	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1089	DOC_0352931	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1090	DOC_0352932	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1091	DOC_0352933	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1092	DOC_0352934	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1093	DOC_0352935	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1095	DOC_0352937	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1096	DOC_0352938	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.

Entry	Control Number	Custodian	File Extension	Author (s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
1097	DOC_0352939	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1098	DOC_0352940	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1099	DOC_0352941	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1100	DOC_0352942	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1101	DOC_0352943	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1102	DOC_0352944	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1103	DOC_0352945	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1104	DOC_0352946	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1105	DOC_0352947	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1106	DOC_0352948	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1107	DOC_0352949	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1108	DOC_0352950	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1109	DOC_0352951	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1110	DOC_0352952	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1112	DOC_0352954	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.

Entry	Control Number	Custodian	File Extension	Author (s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
1113	DOC_0352955	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1114	DOC_0352956	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1115	DOC_0352957	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1116	DOC_0352958	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1117	DOC_0352959	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1118	DOC_0352960	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1119	DOC_0352961	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1120	DOC_0352962	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1121	DOC_0352963	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1122	DOC_0352964	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1123	DOC_0352965	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1124	DOC_0352966	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1125	DOC_0352967	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1126	DOC_0352968	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1127	DOC_0352969	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.

Entry	Control Number	Custodian	File Extension	Author (s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
1129	DOC_0352971	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1130	DOC_0352972	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1131	DOC_0352973	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1132	DOC_0352974	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1133	DOC_0352975	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1134	DOC_0352976	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1135	DOC_0352977	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1136	DOC_0352978	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1137	DOC_0352980	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1138	DOC_0352988	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1139	DOC_0352989	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1140	DOC_0352990	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1141	DOC_0352991	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1142	DOC_0352992	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1143	DOC_0352993	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.

Entry	Control Number	Custodian	File Extension	Author (s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
1144	DOC_0352995	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1146	DOC_0352997	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1147	DOC_0352998	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1148	DOC_0352999	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1149	DOC_0353000	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1150	DOC_0353001	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1151	DOC_0353002	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1152	DOC_0353003	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1153	DOC_0353004	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1154	DOC_0353007	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1155	DOC_0353008	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1156	DOC_0353009	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1157	DOC_0353010	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1158	DOC_0353011	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1159	DOC_0353012	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.

Entry	Control Number	Custodian	File Extension	Author (s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
1160	DOC_0353013	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1161	DOC_0353015	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1163	DOC_0353017	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1164	DOC_0353018	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1165	DOC_0353019	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1166	DOC_0353020	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1167	DOC_0353021	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1168	DOC_0353022	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1169	DOC_0353023	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1170	DOC_0353024	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1171	DOC_0353025	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1172	DOC_0353026	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1173	DOC_0353027	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1174	DOC_0353028	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1175	DOC_0353029	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.

Entry	Control Number	Custodian	File Extension	Author (s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
1176	DOC_0353030	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1177	DOC_0353031	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1178	DOC_0353032	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1180	DOC_0353034	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1181	DOC_0353035	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1182	DOC_0353036	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1183	DOC_0353037	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1184	DOC_0353038	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1185	DOC_0353039	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1186	DOC_0353040	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1187	DOC_0353041	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1188	DOC_0353042	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1189	DOC_0353043	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1190	DOC_0353044	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.
1191	DOC_0353045	Senator Joan Huffman	PDF							Legislative	Draft maps, draft bills and amendments, data, analyses, and other confidential materials created and/or retained for the purpose of creating and/or considerin draft redistricting legislation.	**WITHHOLD.** LP1.

Entry	Control Number	Custodian	File Extension	Author (s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
1192	PDOC_000003	Senator Joan Huffman								Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, with notes and other annotations.	**WITHHOLD.** LP1.
1193	PDOC_000008	Senator Joan Huffman								Legislative	Confidential materials used to prepare for legislative redistricting hearing, including scripts, talking points, data, and other materials, with notes and other annotations.	**WITHHOLD.** LP1.

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Adam Foltz	135	15-18	LP2
Anna Mackin	26	24-25	LP2
Anna Mackin	27	18-19	LP2
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Anna Mackin	31	24-25	LP2
Anna Mackin	31	3-4	LP2
Anna Mackin	32	10-11	LP2
Anna Mackin	32	32:25-33:1	LP2
Anna Mackin	33	13-14	LP2
Anna Mackin	33	21-22	LP2
Anna Mackin	34	11-12	LP2
Anna Mackin	36	12-23	LP2
Anna Mackin	37	23-24	LP2
Anna Mackin	38	10-11	LP2
Anna Mackin	38	16-17	LP2
Anna Mackin	38	23-24	LP2
Anna Mackin	38	4-5	LP2
Anna Mackin	39	3-4	LP2
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Anna Mackin	42	12-17	LP2
Anna Mackin	42	42:25-43:4	LP2
Anna Mackin	42	6-7	LP2
Anna Mackin	43	12-13	Withdrawn
Anna Mackin	43	17-18	Withdrawn
Anna Mackin	46	1-2	LP2
Anna Mackin	46	7-9	LP2
Anna Mackin	47	11-12	LP2
Anna Mackin	47	19-20	LP2
Anna Mackin	47	24	LP2
Anna Mackin	49	22-23	Withdrawn
Anna Mackin	50	10-13	LP2
Anna Mackin	50	4-5	LP2
Anna Mackin	54	20-21	LP2
Anna Mackin	55	16-17	LP2
Anna Mackin	56	12-13	LP2
Anna Mackin	56	5-6	LP2
Anna Mackin	58	19-20	LP2
Anna Mackin	59	16-17	LP2
Anna Mackin	59	2-3	LP2
Anna Mackin	60	19-20	LP2
Anna Mackin	60	24-25	LP2
Anna Mackin	61	10-11	LP2
Anna Mackin	61	16-17	LP2
Anna Mackin	61	23-24	LP2
Anna Mackin	61	8	LP2
Anna Mackin	62	14-15	LP2
Anna Mackin	62	21-24	LP2
Anna Mackin	62	5-6	LP2
Anna Mackin	112	11-12	Withdrawn
Anna Mackin	112	17-18	Withdrawn
Anna Mackin	113	14-15	Withdrawn
Anna Mackin	113	21-22	LP2
Anna Mackin	113	3-4	Withdrawn
Anna Mackin	113	9-10	Withdrawn
Anna Mackin	114	14	Grant, no response
Anna Mackin	114	17	Grant, no response
Anna Mackin	114	20-21	Grant, no response
Anna Mackin	114	5-6	Withdrawn
Anna Mackin	114	9	Withdrawn
Anna Mackin	115	11-12	LP2
Anna Mackin	116	1-2	LP2
Anna Mackin	116	14-15	LP2
Anna Mackin	117	15-16	Grant, improper objection.
Anna Mackin	117	4-5	Grant, improper objection.
Anna Mackin	147	12-13	LP2
Anna Mackin	149	13	LP2
Anna Mackin	149	18-19	Withdrawn
Anna Mackin	149	24	LP2
Anna Mackin	149	5-8	LP2

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Anna Mackin	170	16-18	Withdrawn
Anna Mackin	171	13-18	LP2
Anna Mackin	182	13-14	LP2
Anna Mackin	183	1-2	LP2
Anna Mackin	184	20-21	LP2
Anna Mackin	184	9-10	LP2
Anna Mackin	185	10	LP2
Anna Mackin	185	5-6	LP2
Anna Mackin	186	10-11	LP2
Anna Mackin	186	15-16	LP2
Anna Mackin	186	186:25-187:1	LP2
Anna Mackin	187	18-19	LP2
Anna Mackin	187	187:25-188:1	LP2
Anna Mackin	188	14-15	LP2
Anna Mackin	188	20-21	LP2
Anna Mackin	189	13-14	LP2
Anna Mackin	190	6-7	LP2
Anna Mackin	191	9-10	LP2
Anna Mackin	192	2-3	LP2
Anna Mackin	193	21-22	LP2
Anna Mackin	195	15-16	LP2
Anna Mackin	195	23-24	LP2
Anna Mackin	196	12-13	LP2
Anna Mackin	196	19-20	LP2
Anna Mackin	196	5-6	LP2
Anna Mackin	200	11-12	LP2
Anna Mackin	200	17-19	LP2
Anna Mackin	200	5-6	LP2
Anna Mackin	205	205:25-206:5	LP2
Anna Mackin	208	16-17	LP2
Anna Mackin	209	14-15	LP2
Anna Mackin	209	7-8	LP2
Anna Mackin	210	21-22	LP2
Anna Mackin	210	3-4	LP2
Anna Mackin	210	8-9	LP2
Anna Mackin	211	7-8	LP2
Anna Mackin	212	13-14	LP2
Anna Mackin	213	12-13	LP2
Anna Mackin	213	6-7	LP2
Anna Mackin	214	2-3	LP2
Anna Mackin	215	11	LP2
Anna Mackin	238	1-2	LP2
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Anna Mackin	239	11	LP2
Anna Mackin	239	21-22	LP2
Anna Mackin	239	6-7	LP2
Anna Mackin	241	2-4	LP2
Anna Mackin	242	13-14	LP2
Anna Mackin	243	24-25	LP2
Anna Mackin	244	16-17	LP2
Anna Mackin	244	22-23	LP2
Anna Mackin	260	13-15	LP2
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Anna Mackin	263	3-4	LP2
Chris Gober	40	7-10	LP2
Chris Gober	91	91:25-92:1	LP2
Chris Gober	92	22-23	LP2
Chris Gober	93	15-16	LP2
Chris Gober	94	16-17	LP2
Chris Gober	97	23-24	LP2
Chris Gober	99	13-14	LP2
Chris Gober	101	20-21	LP2
Chris Gober	114	21-23	Grant, improper objection.
Chris Gober	130	22-23	Grant, improper objection.
Chris Gober	133	19-20	Grant, improper objection.
Chris Gober	134	2-4	LP2
Chris Gober	135	24-25	LP2
Chris Gober	135	8-9	LP2

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Chris Gober	137	16-17	LP2
Chris Gober	138	8-11	LP2
Chris Gober	140	6-7	LP2
Chris Gober	142	17-18	LP2
Chris Gober	142	2-3	LP2
Chris Gober	146	21-22	Grant, improper objection.
Chris Gober	147	22	LP2
Chris Gober	147	7-9	LP2
Chris Gober	148	13-14	LP2
Chris Gober	148	148:24-149:1	LP2
Chris Gober	150	1-2	LP2
Chris Gober	150	14-15	LP2
Chris Gober	151	17-19	LP2
Chris Gober	151	6-7	LP2
Chris Gober	152	1-2	LP2
Chris Gober	152	12-14	LP2
Chris Gober	153	20-21	LP4
Chris Gober	154	11-12	Grant, improper objection.
Chris Gober	154	20-21	LP2
Chris Gober	155	9-10	LP2
Chris Gober	159	10-12	LP2
Chris Gober	161	18-21	LP2
Chris Gober	162	20-21	Grant, improper objection.
Chris Gober	170	23-24	LP2
Chris Gober	176	9-10	LP2
Chris Gober	181	5-7	LP2
Chris Gober	182	10-11	LP2
Chris Gober	197	20-23	LP2
Chris Gober	197	2-3	Grant, improper objection.
Chris Gober	198	21-22	LP2
Chris Gober	199	16-17	LP2
Chris Gober	205	4-5	LP2
Chris Gober	206	16-19	LP2
Chris Gober	207	13-14	LP2
Chris Gober	207	207:23-208:1	LP2
Chris Gober	208	208:25-209:2	LP2
Chris Gober	209	19-20	LP2
Chris Gober	212	22-24	LP2
Chris Gober	218	14-16	LP2
Chris Gober	220	25	LP2
Chris Gober	220	6-17	LP2
Chris Gober	222	5	LP2
Chris Gober	223	6-8	LP2
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Chris Gober	225	7-8	LP2
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Chris Gober	240	19-21	LP2
Chris Gober	241	11-13	LP2
Chris Gober	241	17-18	LP2
Chris Gober	241	24-25	LP2
Chris Gober	241	5-6	LP2
Chris Gober	242	4	LP2
Chris Gober	242	6	LP2
Chris Gober	245	24-25	Grant, improper objection.
Chris Gober	250	16-17	LP2
Chris Gober	250	5-7	LP2
Chris Gober	251	14-15	LP2
Chris Gober	252	20-21	LP2
Chris Gober	252	8-10	LP2
Chris Gober	253	16-17	LP2
Chris Gober	253	7-11	LP2
Chris Gober	260	15-16	Grant, improper objection.
Chris Gober	262	6-7	LP2
Chris Gober	264	264:23-265:1	LP2
Chris Gober	266	13-15	LP2
Chris Gober	280	20-25	LP2

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Chris Gober	281	15-16	LP2
Chris Gober	282	17-18	LP2
Chris Gober	282	25	LP2
Colleen Garcia	109	14-15	Grant, improper objection.
Colleen Garcia	109	20	LP2
Colleen Garcia	109	24	LP2
Colleen Garcia	109	5	LP2
Colleen Garcia	110	7-9	LP2
Colleen Garcia	112	13-14	LP2
Colleen Garcia	112	18-19	LP2
Colleen Garcia	114	1-3	LP2
Colleen Garcia	114	18-19	LP2
Colleen Garcia	114	24	LP2
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Colleen Garcia	115	4-5	LP2
Colleen Garcia	188	10-11	LP2
Colleen Garcia	188	1-3	LP2
Rep. Guillen	188	11-12	Grant, improper objection.
Rep. Huberty	74	20-21	LP1
Rep. Huberty	74	6	LP1
Rep. Hunter	22	21-24	LP1
Rep. Hunter	64	15-16	LP1
Rep. Hunter	64	21-22	LP1
Rep. Hunter	65	13-16	LP1
Rep. Hunter	65	2-3	LP1
Rep. Hunter	66	16-17	LP1
Rep. Hunter	66	25	LP1
Rep. Hunter	139	9-10	Grant, improper objection.
Rep. Hunter	176	13-14	Grant, improper objection.
Rep. Hunter	178	13-17	LP1
Rep. Hunter	179	10-11	LP1
Rep. Hunter	179	179:25-180:3	LP1
Rep. Hunter	180	7	LP1
Rep. Hunter	186	13-14	LP1
Rep. Hunter	188	13-15	LP1
Rep. Jetton	56	15-16	LP1
Rep. Jetton	56	21	LP1
Rep. Jetton	56	9-10	LP1
Rep. Jetton	57	1-2	LP1
Rep. Jetton	77	12-16	LP1
Rep. Jetton	89	14-16	LP1
Rep. Jetton	127	1-4	LP1
Rep. Jetton	142	142:25-143:1	LP1
Rep. Jetton	145	17-19	LP1
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Rep. Jetton	146	9-10	LP1
Rep. Jetton	147	13	LP1
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Rep. Jetton	147	3-4	LP1
Rep. Jetton	147	9	LP1
Rep. Jetton	152	4-5	LP1
Rep. Jetton	224	25	LP1
Rep. Jetton	225	6-7	Withdrawn
Rep. Landgraf	119	8-9	LP1
Rep. Landgraf	120	18-19	LP1
Rep. Landgraf	120	4-5	LP1
Rep. Lozano	59	17	LP1
Rep. Lozano	60	3-4	LP1
Rep. Lozano	91	21-22	LP1
Rep. Lozano	92	2-3	LP1
Rep. Lozano	106	24-25	LP1
Rep. Murr	130	24-25	LP1
Rep. Murr	146	15-16	Withdrawn
Rep. Murr	146	21-22	Withdrawn
Rep. Murr	147	19-20	LP1
Rep. Murr	147	24-25	LP1
Rep. Murr	147	8-9	Withdrawn
Rep. Murr	148	21-22	LP1

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Sean Opperman	61	24-25	LP2
Sean Opperman	62	11	LP2
Sean Opperman	62	24-25	LP2
Sean Opperman	62	7-8	Grant, improper objection.
Sean Opperman	66	13-14	LP2
Sean Opperman	66	20-21	LP2
Sean Opperman	67	14-15	LP2
Sean Opperman	67	19	LP2
Sean Opperman	67	2-3	LP2
Sean Opperman	67	24-25	LP2
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Sean Opperman	74	20-21	LP2
Sean Opperman	75	2-3	LP2
Sean Opperman	76	7-9	LP4
Sean Opperman	89	17-18	LP2
Sean Opperman	90	10-12	LP2
Sean Opperman	90	19-20	LP2
Sean Opperman	91	13	LP2
Sean Opperman	91	19-20	LP2
Sean Opperman	92	22-23	Grant, improper objection.
Sean Opperman	93	16-17	LP2
Sean Opperman	93	3-4	LP2
Sean Opperman	102	4-5	LP2
Sean Opperman	108	25	LP2
Sean Opperman	113	12-13	LP2
Sean Opperman	118	3-4	LP2
Sean Opperman	122	22-23	LP2
Sean Opperman	123	10-11	LP2
Sean Opperman	123	4-5	LP2
Sean Opperman	124	11-12	LP2
Sean Opperman	124	21-22	LP2
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Sean Opperman	125	16-17	LP2
Sean Opperman	125	5-10	LP2
Sean Opperman	126	11-14	LP2
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Sean Opperman	129	10-11	LP2
Sean Opperman	132	1-2	LP2
Sean Opperman	132	15-16	LP2
Sean Opperman	134	19-20	LP2
Sean Opperman	135	16-17	LP2
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Sean Opperman	191	24-25	LP2
Sean Opperman	192	12-13	LP2
Sean Opperman	226	16-17	LP2
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Sean Opperman	227	21-22	LP2
Sean Opperman	227	4-5	LP2
Sean Opperman	228	17-18	LP2
Sean Opperman	228	23-24	LP2
Sean Opperman	229	20-21	LP2
Sean Opperman	229	3-4	LP2
Sean Opperman	230	23-24	LP2
Sean Opperman	246	1-2	LP2
Sean Opperman	246	15-16	LP2
Sean Opperman	246	6-7	LP2
Sean Opperman	247	12-13	LP2
Sean Opperman	247	18-20	LP2
Sean Opperman	247	25	LP2
Sean Opperman	247	7-8	LP2
Sean Opperman	248	10-11	LP2
Sean Opperman	248	15-16	LP2
Sean Opperman	248	21-22	LP2
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Sean Opperman	249	12-13	LP2
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Sean Opperman	252	15-21	LP2
Sean Opperman	252	9-10	LP2
Sean Opperman	253	12-13	LP2
Sean Opperman	253	2-3	LP2
Sean Opperman	259	1-2	LP2
Sean Opperman	261	18-19	LP2
Sean Opperman	268	19-24	LP2
Sean Opperman	269	2-3	LP2
Sean Opperman	286	11-13	LP2
Sean Opperman	286	19-20	LP2
Sean Opperman	287	16-17	LP2
Sean Opperman	288	1-2	LP2
Sean Opperman	288	12-16	LP2
Sean Opperman	290	23-24	LP2
Sean Opperman	291	291:24-292:3	LP2
Sean Opperman	291	9-10	LP2
Sean Opperman	292	9-10	LP2
Sean Opperman	293	21-22	LP2
Sean Opperman	293	3-4	LP2
Sean Opperman	293	8-9	LP2
Sean Opperman	294	11-12	LP2
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Sean Opperman	295	11-12	LP2
Sean Opperman	295	1-2	LP2
Sean Opperman	295	19-22	LP2
Sean Opperman	295	6-7	LP2
Sean Opperman	296	1-2	LP2
Sean Opperman	296	14-15	LP2
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Sean Opperman	311	21-22	LP2
Sean Opperman	312	1-2	LP2
Sean Opperman	312	12-13	LP2
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Sean Opperman	313	11-12	LP2
Sean Opperman	313	313:18-314:3	LP2
Sean Opperman	313	4-5	LP2
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Sean Opperman	315	12-13	LP2
Sean Opperman	315	19-20	LP2
Sean Opperman	315	23-24	LP2
Sean Opperman	315	6-7	LP2
Sean Opperman	316	12-13	LP2
Sean Opperman	316	17	LP2
Sean Opperman	316	3-4	LP2
Sean Opperman	317	16-17	LP2
Sean Opperman	317	24-25	LP2
Sean Opperman	317	3-4	LP2
Sean Opperman	318	10-11	LP2
Sean Opperman	318	15	LP2
Sean Opperman	318	23-24	LP2
Sean Opperman	318	5-6	LP2
Sean Opperman	319	18-19	LP2
Sean Opperman	319	23	LP2
Sean Opperman	319	8-9	LP2
Anna Mackin	33	13-14	LP2
Anna Mackin	33	21-22	LP2
Anna Mackin	34	11-12	LP2
Anna Mackin	34	17-18	Withdrawn
Anna Mackin	34	23-24	Withdrawn
Anna Mackin	35	10-12	Withdrawn
Anna Mackin	35	16-17	LP2
Anna Mackin	35	21-22	Withdrawn
Anna Mackin	35	5-6	Withdrawn
Anna Mackin	36	1-2	Withdrawn
Anna Mackin	36	12-23	LP2
Anna Mackin	36	6-7	Withdrawn
Anna Mackin	37	23-24	LP2
Anna Mackin	37	3-9	LP2
Anna Mackin	38	10-11	LP2
Anna Mackin	38	16-17	LP2
Anna Mackin	38	23-24	LP2
Anna Mackin	38	4-5	LP2
Anna Mackin	39	3-4	LP2
Anna Mackin	39	39:25-40:7	LP2
Anna Mackin	39	9-18	LP2
Anna Mackin	40	16-18	LP2
Anna Mackin	41	1-2	LP2
Anna Mackin	41	16-17	LP2
Anna Mackin	41	41:21-42:1	LP2
Anna Mackin	42	12-17	LP2
Anna Mackin	42	42:25-43:4	LP2
Anna Mackin	42	6-7	LP2
Anna Mackin	43	12-13	Withdrawn
Anna Mackin	43	17-18	Withdrawn
Anna Mackin	43	22-24	LP2
Anna Mackin	44	20-25	LP2
Anna Mackin	44	6-7	LP2
Anna Mackin	45	11-15	LP2
Anna Mackin	45	21-22	LP2
Anna Mackin	45	3-4	LP2
Anna Mackin	46	1-2	LP2
Anna Mackin	46	7-9	LP2
Anna Mackin	47	11-12	LP2
Anna Mackin	47	19-20	LP2
Anna Mackin	47	24	LP2
Anna Mackin	48	12-15	LP2
Anna Mackin	48	4-7	LP2
Anna Mackin	48	48:24-49:4	LP2
Anna Mackin	49	11-13	Withdrawn
Anna Mackin	54	13-14	Withdrawn
Anna Mackin	54	20-21	LP2
Anna Mackin	54	7-8	LP2
Anna Mackin	55	16-17	LP2
Anna Mackin	56	12-13	LP2
Anna Mackin	56	18-19	LP2
Anna Mackin	56	5-6	LP2

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Anna Mackin	57	9-12	LP2
Anna Mackin	58	19-20	LP2
Anna Mackin	58	2-15	LP2
Anna Mackin	59	16-17	LP2
Anna Mackin	59	22-25	LP2
Anna Mackin	59	2-3	LP2
Anna Mackin	60	11-12	LP2
Anna Mackin	60	19-20	LP2
Anna Mackin	60	24-25	LP2
Anna Mackin	61	10-11	LP2
Anna Mackin	61	16-17	LP2
Anna Mackin	61	23-24	LP2
Anna Mackin	61	8	LP2
Anna Mackin	62	14-15	LP2
Anna Mackin	62	21-24	LP2
Anna Mackin	62	5-6	LP2
Anna Mackin	145	145:25-146:1	LP2
Anna Mackin	146	12-13	LP2
Anna Mackin	147	12-13	LP2
Anna Mackin	148	10-11	LP2
Anna Mackin	148	3	LP2
Anna Mackin	150	15-16	LP2
Anna Mackin	150	21-22	LP2
Anna Mackin	150	3-4	LP2
Anna Mackin	150	7-8	LP2
Anna Mackin	151	13-17	LP2
Anna Mackin	151	23	LP2
Anna Mackin	151	2-3	LP2
Anna Mackin	151	7-8	LP2
Anna Mackin	152	13	LP2
Anna Mackin	152	19-20	LP2
Anna Mackin	152	3-4	LP2
Anna Mackin	152	9-10	LP2
Anna Mackin	153	2-3	LP2
Anna Mackin	154	14-15	LP2
Anna Mackin	154	154:25-155:1	LP2
Anna Mackin	154	20	LP2
Anna Mackin	155	14-18	LP2
Anna Mackin	155	22-24	LP2
Anna Mackin	155	9	LP2
Anna Mackin	156	12-16	LP2
Anna Mackin	156	20-21	LP2
Anna Mackin	156	3-4	LP2
Anna Mackin	157	3-7	LP2
Anna Mackin	160	19-22	LP2
Anna Mackin	161	10-11	LP2
Anna Mackin	161	13-14	LP2
Anna Mackin	161	19-23	LP2
Anna Mackin	161	5-6	LP2
Anna Mackin	162	17-21	LP2
Anna Mackin	162	3-7	LP2
Anna Mackin	163	13-14	LP2
Anna Mackin	163	21-25	LP2
Anna Mackin	164	15-18	LP2
Anna Mackin	164	164:22-165:4	LP2
Anna Mackin	164	7-9	LP2
Anna Mackin	165	15-17	LP2
Anna Mackin	166	10-12	LP2
Anna Mackin	167	12-14	LP2
Anna Mackin	167	19	Withdrawn
Anna Mackin	167	22	Withdrawn
Anna Mackin	167	25	Withdrawn
Anna Mackin	168	16-19	LP2
Anna Mackin	168	5	LP2
Anna Mackin	169	10-17	LP2
Anna Mackin	169	21-23	LP2
Anna Mackin	169	3	LP2
Anna Mackin	169	6	LP2
Anna Mackin	170	5-10	LP2

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Deponent	Starting Page Number	Line Number	Ruling
Anna Mackin	171	21-22	LP2
Anna Mackin	172	15-16	LP2
Anna Mackin	172	21-22	LP2
Anna Mackin	172	2-3	LP2
Anna Mackin	172	8-9	LP2
Anna Mackin	173	11-17	Withdrawn
Anna Mackin	173	20	Withdrawn
Anna Mackin	173	24	Withdrawn
Anna Mackin	174	11-13	LP2
Anna Mackin	174	174:22-175:1	LP2
Anna Mackin	174	3	LP2
Anna Mackin	174	7	LP2
Anna Mackin	175	8-13	LP2
Anna Mackin	176	1	LP2
Anna Mackin	176	10-15	LP2
Anna Mackin	176	23	LP2
Anna Mackin	177	17	LP2
Anna Mackin	177	177:25-178:6	LP2
Anna Mackin	177	21	LP2
Anna Mackin	177	3-7	LP2
Anna Mackin	178	11-13	Withdrawn
Anna Mackin	178	19-20	LP2
Anna Mackin	179	21-24	LP2
Anna Mackin	179	8-10	LP2
Anna Mackin	180	14-22	LP2
Anna Mackin	181	181:24-182:3	LP2
Anna Mackin	182	13-14	LP2
Anna Mackin	183	1-2	LP2
Anna Mackin	184	20-21	LP2
Anna Mackin	184	9-10	LP2
Anna Mackin	185	10	LP2
Anna Mackin	185	5-6	LP2
Anna Mackin	186	10-11	LP2
Anna Mackin	186	15-16	LP2
Anna Mackin	186	186:25-187:1	LP2
Anna Mackin	187	18-19	LP2
Anna Mackin	187	187:25-188:1	LP2
Anna Mackin	188	14-15	LP2
Anna Mackin	188	20-21	LP2
Anna Mackin	189	13-14	LP2
Anna Mackin	190	11-12	LP2
Anna Mackin	190	18-19	LP2
Anna Mackin	190	6-7	LP2
Anna Mackin	191	9-10	LP2
Anna Mackin	192	2-3	LP2
Anna Mackin	193	21-22	LP2
Anna Mackin	195	1-2	LP2
Anna Mackin	195	15-16	LP2
Anna Mackin	195	23-24	LP2
Anna Mackin	196	12-13	LP2
Anna Mackin	196	19-20	LP2
Anna Mackin	196	196:25-197:1	LP2
Anna Mackin	196	5-6	LP2
Anna Mackin	197	14-16	LP2
Anna Mackin	198	12-13	LP2
Anna Mackin	198	17-18	LP2
Anna Mackin	199	15-21	LP2
Anna Mackin	200	11-12	LP2
Anna Mackin	200	17-19	LP2
Anna Mackin	200	5-6	LP2
Anna Mackin	201	20-22	Grant, improper objection.
Anna Mackin	202	202:25-203:1	LP2
Anna Mackin	203	13-14	Withdrawn
Anna Mackin	205	16-17	LP2
Anna Mackin	205	205:25-206:5	LP2
Anna Mackin	207	2-3	LP2
Anna Mackin	208	16-17	LP2
Anna Mackin	209	14-15	LP2
Anna Mackin	209	7-8	LP2

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Anna Mackin	210	21-22	LP2
Anna Mackin	210	3-4	LP2
Anna Mackin	210	8-9	LP2
Anna Mackin	211	7-8	LP2
Anna Mackin	212	13-14	LP2
Anna Mackin	213	12-13	LP2
Anna Mackin	213	6-7	LP2
Anna Mackin	214	10-11	Withdrawn
Anna Mackin	214	2-3	LP2
Anna Mackin	215	11	LP2
Anna Mackin	217	16-19	LP2
Anna Mackin	217	8-12	LP2
Anna Mackin	221	21-24	LP2
Anna Mackin	222	13-18	LP2
Anna Mackin	222	5-6	LP2
Anna Mackin	223	2-8	LP2
Anna Mackin	225	1-2	LP2
Anna Mackin	226	13-14	LP2
Anna Mackin	226	21-25	LP2
Anna Mackin	226	4-7	LP2
Anna Mackin	227	16-18	LP2
Anna Mackin	227	24-25	LP2
Anna Mackin	227	6-9	LP2
Anna Mackin	228	5-6	LP2
Anna Mackin	229	5-9	LP2
Anna Mackin	230	20-21	LP2
Anna Mackin	230	5-6	LP2
Anna Mackin	231	12-13	LP2
Anna Mackin	231	17-21	LP2
Anna Mackin	231	4-5	LP2
Anna Mackin	235	18-20	LP2
Anna Mackin	235	235:24-236:2	LP2
Anna Mackin	238	1-2	LP2
Anna Mackin	238	6-7	LP2
Anna Mackin	239	11	LP2
Anna Mackin	239	21-22	LP2
Anna Mackin	239	6-7	LP2
Anna Mackin	241	2-4	LP2
Anna Mackin	241	8-14	LP2
Anna Mackin	242	13-14	LP2
Anna Mackin	243	24-25	LP2
Anna Mackin	244	16-17	LP2
Anna Mackin	244	22-23	LP2
Anna Mackin	245	16-20	LP2
Anna Mackin	247	11-12	LP2
Anna Mackin	247	20-25	LP2
Anna Mackin	247	6	LP2
Anna Mackin	248	12-15	LP2
Anna Mackin	248	248:25-249:1	LP2
Anna Mackin	248	5-6	LP2
Anna Mackin	252	8-9	LP2
Anna Mackin	260	13-15	LP2
Anna Mackin	263	3-4	LP2
Anna Mackin	264	1-2	LP2
Anna Mackin	266	11-12	LP2
Anna Mackin	266	19-20	LP2
Anna Mackin	267	1-2	LP2
Anna Mackin	267	14-15	LP2
Anna Mackin	267	24-25	LP2
Anna Mackin	268	19-20	LP2
Anna Mackin	269	4-5	LP2
Chris Gober	91	91:25-92:1	LP2
Chris Gober	92	22-23	LP2
Chris Gober	93	15-16	LP2
Chris Gober	94	16-17	LP2
Chris Gober	97	23-24	LP2
Chris Gober	99	13-14	LP2
Chris Gober	101	20-21	LP2
Chris Gober	114	21-23	Grant, improper objection.

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Deponent	Starting Page Number	Line Number	Ruling
Chris Gober	130	22-23	LP2
Chris Gober	133	19-20	Grant, improper objection.
Chris Gober	134	2-4	LP2
Chris Gober	135	24-25	LP2
Chris Gober	135	8-9	LP2
Chris Gober	137	16-17	LP2
Chris Gober	138	8-11	LP2
Chris Gober	140	6-7	LP2
Chris Gober	142	17-18	LP2
Chris Gober	142	2-3	LP2
Chris Gober	146	21-22	LP2
Chris Gober	147	22	LP2
Chris Gober	147	7-9	LP2
Chris Gober	148	13-14	LP2
Chris Gober	148	148:24-149:1	LP2
Chris Gober	150	1-2	LP2
Chris Gober	150	14-15	LP2
Chris Gober	151	17-19	LP2
Chris Gober	151	6-7	LP2
Chris Gober	152	1-2	LP2
Chris Gober	152	12-14	LP2
Chris Gober	153	20-21	LP2
Chris Gober	154	11-12	Grant, improper objection.
Chris Gober	154	20-21	LP2
Chris Gober	155	9-10	LP2
Chris Gober	159	10-12	LP2
Chris Gober	161	18-21	LP2
Chris Gober	162	20-21	Grant, improper objection.
Chris Gober	181	5-7	LP2
Chris Gober	182	10-11	LP2
Chris Gober	197	20-23	LP2
Chris Gober	197	2-3	LP2
Chris Gober	198	21-22	LP2
Chris Gober	199	16-17	LP2
Chris Gober	205	4-5	LP2
Chris Gober	206	16-19	LP2
Chris Gober	207	13-14	LP2
Chris Gober	207	207:23-208:1	LP2
Chris Gober	208	208:25-209:2	LP2
Chris Gober	209	19-20	LP2
Chris Gober	212	22-24	LP2
Chris Gober	218	14-16	LP2
Chris Gober	222	5	LP2
Chris Gober	223	6-8	LP2
Chris Gober	224	22-23	LP2
Chris Gober	224	2-3	LP2
Chris Gober	225	20-21	LP2
Chris Gober	225	7-8	LP2
Chris Gober	226	12-13	LP2
Chris Gober	226	4-5	LP2
Chris Gober	240	19-21	LP2
Chris Gober	241	11-13	LP2
Chris Gober	241	17-18	LP2
Chris Gober	241	24-25	LP2
Chris Gober	241	5-6	LP2
Chris Gober	242	4	LP2
Chris Gober	242	6	LP2
Chris Gober	245	24-25	Grant, improper objection.
Chris Gober	250	16-17	LP2
Chris Gober	250	5-7	LP2
Chris Gober	251	14-15	LP2
Chris Gober	252	20-21	LP2
Chris Gober	252	8-10	LP2
Chris Gober	253	16-17	LP2
Chris Gober	253	7-11	LP2
Chris Gober	260	15-16	Grant, improper objection.
Chris Gober	262	6-7	LP2
Chris Gober	264	264:23-265:1	LP2
Chris Gober	266	13-15	LP2

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Deponent	Starting Page Number	Line Number	Ruling
Chris Gober	280	20-25	LP2
Chris Gober	281	15-16	LP2
Chris Gober	282	17-18	LP2
Chris Gober	282	25	LP2
Colleen Garcia	75	10-11	LP2
Colleen Garcia	75	4	LP2
Colleen Garcia	76	3	LP2
Colleen Garcia	109	14-15	LP2
Colleen Garcia	109	20	LP2
Colleen Garcia	109	24	LP2
Colleen Garcia	109	5	Grant, improper objection.
Colleen Garcia	110	7-9	LP2
Colleen Garcia	112	18-19	LP2
Colleen Garcia	114	18-19	LP2
Colleen Garcia	115	4-5	LP2
Colleen Garcia	214	7-8	LP2
Colleen Garcia	215	20-21	LP2
Colleen Garcia	216	16-17	LP2
Colleen Garcia	216	24-25	LP2
Colleen Garcia	216	9-10	LP2
Colleen Garcia	217	7-9	LP2
Colleen Garcia	221	221:25-222:1	LP2
Colleen Garcia	222	7-8	LP2
Colleen Garcia	223	15-16	LP2
Colleen Garcia	223	22-23	LP2
Mark Bell	75	20-21	LP2
Mark Bell	76	3-4	LP2
Rep. Guillen	169	22-23	LP1
Rep. Guillen	185	19-20	LP1
Rep. Guillen	186	14-15	LP1
Rep. Guillen	186	4-5	LP1
Rep. Guillen	187	1-2	LP1
Rep. Guillen	187	5	LP1
Rep. Guillen	188	11-12	LP1
Rep. Guillen	188	18-19	LP1
Rep. Guillen	188	24-25	LP1
Rep. Guillen	188	4-5	LP1
Rep. Guillen	189	13-14	LP1
Rep. Guillen	189	19-20	LP1
Rep. Guillen	189	7-8	LP1
Rep. Guillen	190	10-11	LP1
Rep. Guillen	190	17-18	LP1
Rep. Guillen	190	24-25	LP1
Rep. Guillen	190	3-4	LP1
Rep. Guillen	191	10-11	LP1
Rep. Guillen	192	14-15	LP1
Rep. Guillen	192	6-7	LP1
Rep. Guillen	199	14-15	LP1
Rep. Guillen	199	199:18-200:10	LP4
Rep. Huberty	73	17-19	Grant, improper objection.
Rep. Huberty	73	24-25	LP1
Rep. Huberty	74	20-21	LP1
Rep. Huberty	74	6	LP1
Rep. Huberty	75	17	LP1
Rep. Hunter	57	9-11	LP1
Rep. Hunter	66	16-17	LP1
Rep. Hunter	66	25	LP1
Rep. Hunter	180	19-20	LP1
Rep. Hunter	184	22-23	LP3
Rep. Hunter	186	13-14	LP1
Rep. Hunter	188	13-15	LP1
Rep. Hunter	189	11-12	LP1
Rep. Hunter	189	1-2	LP1
Rep. Hunter	193	10-11	LP1
Rep. Hunter	193	16-17	LP1
Rep. Hunter	193	22	LP1
Rep. Hunter	194	11-12	LP1
Rep. Hunter	195	22-24	LP1
Rep. Hunter	196	15-17	LP1

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Deponent	Starting Page Number	Line Number	Ruling
Rep. Hunter	196	196:24-197:4	LP1
Rep. Hunter	196	8-12	LP1
Rep. Hunter	197	18	LP1
Rep. Hunter	215	10-11	LP1
Rep. Hunter	215	215:25-216:1	LP1
Rep. Hunter	217	217:24-218:2	LP1
Rep. Hunter	218	12-14	LP1
Rep. Hunter	276	276:23-277:1	LP1
Rep. Hunter	277	13-16	LP1
Rep. Hunter	278	278:24-279:3	LP1
Rep. Hunter	280	19-20	LP1
Rep. Jetton	116	14-15	LP1
Rep. Jetton	116	18-21	LP1
Rep. Jetton	117	1-2	LP1
Rep. Jetton	117	20-21	LP1
Rep. Jetton	119	3-4	LP1
Rep. Jetton	119	9-12	LP1
Rep. Jetton	124	21-25	LP1
Rep. Jetton	125	14-15	LP1
Rep. Jetton	125	21-24	LP1
Rep. Jetton	125	7-10	LP1
Rep. Jetton	126	12-13	LP1
Rep. Jetton	126	17-19	LP1
Rep. Jetton	126	5-7	LP1
Rep. Jetton	127	1-4	LP1
Rep. Jetton	129	15-16	LP1
Rep. Jetton	129	4-5	LP1
Rep. Jetton	129	9-10	LP1
Rep. Jetton	133	22-24	LP1
Rep. Jetton	133	6-9	LP1
Rep. Jetton	134	7-9	LP1
Rep. Jetton	137	18-21	LP1
Rep. Jetton	148	11-12	LP1
Rep. Jetton	148	148:25-149:1	LP1
Rep. Jetton	148	19-20	LP1
Rep. Jetton	148	4-5	LP1
Rep. Jetton	149	10-13	LP1
Rep. Jetton	149	20-21	LP1
Rep. Jetton	149	24-25	LP1
Rep. Jetton	149	6-7	LP1
Rep. Jetton	150	13-14	LP1
Rep. Jetton	162	10-11	LP1
Rep. Jetton	211	6-9	LP1
Rep. Jetton	215	22-25	LP1
Rep. Jetton	216	11-12	LP1
Rep. Jetton	216	22-23	LP1
Rep. Jetton	216	5	LP1
Rep. Landgraf	144	12-13	LP1
Rep. Landgraf	144	3-4	LP1
Rep. Landgraf	144	8-9	LP1
Rep. Landgraf	157	20-21	LP1
Rep. Landgraf	157	5-6	LP1
Rep. Landgraf	158	7-16	LP1
Rep. Landgraf	160	16-17	LP1
Rep. Landgraf	196	15	LP1
Rep. Landgraf	196	22-23	LP1
Rep. Landgraf	196	7-11	LP1
Rep. Landgraf	197	197:9-198:3	LP1
Rep. Landgraf	197	4-6	LP1
Rep. Landgraf	204	19-20	LP1
Rep. Landgraf	293	293:20-294:2	LP4
Rep. Landgraf	294	21-23	LP1
Rep. Landgraf	296	20-22	LP1
Rep. Lozano	87	10	LP1
Rep. Lozano	89	19-20	LP1
Rep. Lozano	89	89:24-90:1	LP1
Rep. Lozano	90	6	LP1
Rep. Lozano	91	21-22	LP1
Rep. Lozano	92	2-3	LP1

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Deponent	Starting Page Number	Line Number	Ruling
Rep. Murr	143	12-13	LP1
Rep. Murr	143	22-23	LP1
Rep. Murr	143	5-6	LP1
Rep. Murr	144	11-12	LP1
Rep. Murr	144	144:25-145:1	LP1
Rep. Murr	144	19-20	LP1
Rep. Murr	144	3-4	LP1
Rep. Murr	145	5-6	LP1
Rep. Murr	146	15-16	Withdrawn
Rep. Murr	146	21-22	Withdrawn
Rep. Murr	147	19-20	LP1
Rep. Murr	147	24-25	LP1
Rep. Murr	147	8-9	Withdrawn
Rep. Murr	148	15-16	LP1
Rep. Murr	148	21-22	LP1
Rep. Murr	148	7-8	LP1
Rep. Murr	149	16-17	LP1
Rep. Murr	149	7-8	LP1
Rep. Murr	158	3-4	LP1
Rep. Murr	159	23-24	LP1
Rep. Murr	159	7-8	LP1
Rep. Murr	160	17-18	LP1
Rep. Murr	163	17-18	LP1
Rep. Murr	163	7-10	LP1
Rep. Murr	164	1-2	LP1
Rep. Murr	164	14-16	LP1
Rep. Murr	164	6-7	LP1
Sean Opperman	43	12-13	Grant, no response
Sean Opperman	43	18	Grant, no response
Sean Opperman	44	20-21	Grant, no response
Sean Opperman	45	12-13	Grant, no response
Sean Opperman	45	17-19	Grant, no response
Sean Opperman	45	45:25-46:1	Grant, no response
Sean Opperman	46	9-10	Grant, no response
Sean Opperman	47	13-14	Grant, no response
Sean Opperman	47	20	Grant, no response
Sean Opperman	48	1	Grant, no response
Sean Opperman	48	10	Grant, no response
Sean Opperman	48	18-19	Grant, no response
Sean Opperman	49	10	Grant, no response
Sean Opperman	49	18-19	Grant, no response
Sean Opperman	49	2	Grant, no response
Sean Opperman	49	7	Grant, no response
Sean Opperman	52	21-22	Grant, no response
Sean Opperman	52	8-9	Grant, no response
Sean Opperman	53	22-23	Grant, no response
Sean Opperman	53	9-10	Grant, no response
Sean Opperman	57	22-23	Grant, no response
Sean Opperman	58	13-16	Grant, no response
Sean Opperman	59	4-7	Grant, no response
Sean Opperman	59	59:24-60:2	Grant, no response
Sean Opperman	61	24-25	Grant, no response
Sean Opperman	62	11	Grant, no response
Sean Opperman	62	24-25	Grant, no response
Sean Opperman	62	7-8	Grant, no response
Sean Opperman	63	12-13	Grant, no response
Sean Opperman	64	11-12	Grant, no response
Sean Opperman	64	18-21	Grant, no response
Sean Opperman	64	4-5	Grant, no response
Sean Opperman	65	11-13	Grant, no response
Sean Opperman	65	65:25-66:1	Grant, no response
Sean Opperman	66	13-14	Grant, no response
Sean Opperman	66	20-21	Grant, no response
Sean Opperman	67	14-15	Grant, no response
Sean Opperman	67	19	Grant, no response
Sean Opperman	67	2-3	Grant, no response
Sean Opperman	67	24-25	Grant, no response
Sean Opperman	67	8	Grant, no response
Sean Opperman	68	10-11	Grant, no response

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Deponent	Starting Page Number	Line Number	Ruling
Sean Opperman	68	21-22	Grant, no response
Sean Opperman	68	5-6	Grant, no response
Sean Opperman	69	11-12	Grant, no response
Sean Opperman	69	18-19	Grant, no response
Sean Opperman	69	5-6	Grant, no response
Sean Opperman	70	11-16	Grant, no response
Sean Opperman	70	1-3	Grant, no response
Sean Opperman	70	21-22	Grant, no response
Sean Opperman	71	3-4	Grant, no response
Sean Opperman	72	14-15	Grant, no response
Sean Opperman	72	24-25	Grant, no response
Sean Opperman	72	4-5	Grant, no response
Sean Opperman	73	11-12	Grant, no response
Sean Opperman	73	21-22	Grant, no response
Sean Opperman	74	20-21	Grant, no response
Sean Opperman	74	2-3	LP2
Sean Opperman	75	2-3	LP2
Sean Opperman	75	8-9	LP2
Sean Opperman	76	7-9	LP2
Sean Opperman	79	21-22	LP2
Sean Opperman	80	10-13	Withdrawn
Sean Opperman	80	19-20	Withdrawn
Sean Opperman	80	3-5	LP2
Sean Opperman	81	12-15	LP2
Sean Opperman	82	4-9	LP2
Sean Opperman	85	16-17	LP2
Sean Opperman	85	8-9	LP2
Sean Opperman	89	17-18	LP2
Sean Opperman	90	10-12	LP2
Sean Opperman	90	19-20	LP2
Sean Opperman	90	3-4	LP2
Sean Opperman	91	13	LP2
Sean Opperman	91	19-20	LP2
Sean Opperman	92	22-23	Grant, improper objection.
Sean Opperman	93	16-17	LP2
Sean Opperman	93	3-4	LP2
Sean Opperman	94	10-11	LP2
Sean Opperman	94	94:25-95:1	LP2
Sean Opperman	95	13-14	LP2
Sean Opperman	95	19-20	LP2
Sean Opperman	95	7-8	LP2
Sean Opperman	96	2-5	LP2
Sean Opperman	98	2-3	LP2
Sean Opperman	98	7-9	LP2
Sean Opperman	102	4-5	LP2
Sean Opperman	103	103:23-104:1	Withdrawn
Sean Opperman	104	25	LP2
Sean Opperman	105	17-18	LP2
Sean Opperman	106	11-12	LP2
Sean Opperman	106	19-20	LP2
Sean Opperman	106	4-5	LP2
Sean Opperman	107	16-17	LP2
Sean Opperman	107	2-3	LP2
Sean Opperman	107	23-24	Withdrawn
Sean Opperman	108	25	LP2
Sean Opperman	109	4-5	Withdrawn
Sean Opperman	109	9	Withdrawn
Sean Opperman	111	16-18	Withdrawn
Sean Opperman	111	8-9	Withdrawn
Sean Opperman	113	12-13	LP2
Sean Opperman	116	5-6	LP2
Sean Opperman	117	14-15	LP2
Sean Opperman	117	6-7	LP2
Sean Opperman	118	19-20	LP2
Sean Opperman	118	3-4	LP2
Sean Opperman	120	13-15	LP2
Sean Opperman	120	23-25	LP2
Sean Opperman	121	121:22-122:2	LP2
Sean Opperman	121	7-9	LP2

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Sean Opperman	122	15-18	Grant, improper objection.
Sean Opperman	122	22-23	LP2
Sean Opperman	123	10-11	LP2
Sean Opperman	123	18-19	LP2
Sean Opperman	123	4-5	LP2
Sean Opperman	124	11-12	LP2
Sean Opperman	124	21-22	LP2
Sean Opperman	124	5-6	LP2
Sean Opperman	125	16-17	LP2
Sean Opperman	125	22-23	LP2
Sean Opperman	125	5-10	LP2
Sean Opperman	126	11-14	LP2
Sean Opperman	126	21-22	LP2
Sean Opperman	128	16-17	LP2
Sean Opperman	128	2-3	LP2
Sean Opperman	128	7-8	Withdrawn
Sean Opperman	129	10-11	LP2
Sean Opperman	131	17-18	LP2
Sean Opperman	132	1-2	LP2
Sean Opperman	132	15-16	LP2
Sean Opperman	132	22-24	Withdrawn
Sean Opperman	132	8-9	LP2
Sean Opperman	134	19-20	LP2
Sean Opperman	135	16-17	LP2
Sean Opperman	135	23-24	LP2
Sean Opperman	136	24-25	LP2
Sean Opperman	137	20-21	LP2
Sean Opperman	138	138:25-139:1	LP2
Sean Opperman	138	16-17	Grant, no response
Sean Opperman	138	2-3	LP2
Sean Opperman	138	9-10	LP2
Sean Opperman	139	20-21	LP2
Sean Opperman	139	6-7	LP2
Sean Opperman	140	1-2	LP2
Sean Opperman	140	22-23	LP2
Sean Opperman	140	7-8	LP2
Sean Opperman	141	15-16	LP2
Sean Opperman	141	4-5	LP2
Sean Opperman	175	16-17	LP2
Sean Opperman	176	12-13	LP2
Sean Opperman	176	3-4	LP2
Sean Opperman	226	16-17	LP2
Sean Opperman	226	22-23	LP2
Sean Opperman	227	10-11	LP2
Sean Opperman	227	21-22	LP2
Sean Opperman	227	4-5	LP2
Sean Opperman	228	17-18	LP2
Sean Opperman	228	23-24	LP2
Sean Opperman	229	20-21	LP2
Sean Opperman	229	3-4	LP2
Sean Opperman	230	16-17	LP2
Sean Opperman	230	23-24	LP2
Sean Opperman	230	3-4	LP2
Sean Opperman	230	9-12	LP2
Sean Opperman	231	10-11	LP2
Sean Opperman	231	19-20	LP2
Sean Opperman	231	231:25-232:1	LP2
Sean Opperman	231	5-6	LP2
Sean Opperman	232	5-7	LP4
Sean Opperman	246	1-2	LP2
Sean Opperman	246	15-16	LP2
Sean Opperman	246	6-7	LP2
Sean Opperman	247	12-13	LP2
Sean Opperman	247	18-20	LP2
Sean Opperman	247	25	LP2
Sean Opperman	247	7-8	LP2
Sean Opperman	248	10-11	LP2
Sean Opperman	248	15-16	LP2
Sean Opperman	248	21-22	LP2

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Sean Opperman	248	5	LP2
Sean Opperman	249	12-13	LP2
Sean Opperman	249	249:25-250:1	LP2
Sean Opperman	249	5-6	LP2
Sean Opperman	250	21-22	LP2
Sean Opperman	250	6-7	LP2
Sean Opperman	251	251:19-252:2	LP2
Sean Opperman	251	4-9	LP2
Sean Opperman	252	15-21	LP2
Sean Opperman	252	9-10	LP2
Sean Opperman	253	12-13	LP2
Sean Opperman	253	2-3	LP2
Sean Opperman	255	255:23-256:3	LP2
Sean Opperman	256	21-22	Withdrawn
Sean Opperman	256	8-15	LP2
Sean Opperman	257	3-13	LP2
Sean Opperman	259	11-14	LP2
Sean Opperman	259	1-2	LP2
Sean Opperman	259	19-20	LP2
Sean Opperman	260	1-2	LP2
Sean Opperman	261	18-19	LP2
Sean Opperman	268	19-24	LP2
Sean Opperman	269	2-3	LP2
Sean Opperman	270	15-20	LP2
Sean Opperman	271	16-18	LP2
Sean Opperman	271	23-24	LP2
Sean Opperman	271	9-11	LP2
Sean Opperman	272	4-5	LP2
Sean Opperman	273	24-25	LP2
Sean Opperman	274	5	LP2
Sean Opperman	275	17-18	LP2
Sean Opperman	275	2-3	LP2
Sean Opperman	275	9-10	LP2
Sean Opperman	276	9-10	LP2
Sean Opperman	280	280:21-821:1	LP2
Sean Opperman	282	8-9	LP2
Sean Opperman	286	11-13	LP2
Sean Opperman	286	19-20	LP2
Sean Opperman	287	16-17	LP2
Sean Opperman	288	1-2	LP2
Sean Opperman	288	12-16	LP2
Sean Opperman	290	23-24	LP4
Sean Opperman	291	291:24-292:3	LP2
Sean Opperman	291	9-10	LP2
Sean Opperman	292	9-10	LP2
Sean Opperman	293	15-16	LP2
Sean Opperman	293	21-22	LP2
Sean Opperman	293	3-4	LP2
Sean Opperman	293	8-9	LP2
Sean Opperman	294	11-12	LP2
Sean Opperman	294	17-18	LP2
Sean Opperman	294	2-3	LP2
Sean Opperman	295	11-12	LP2
Sean Opperman	295	1-2	LP2
Sean Opperman	295	19-22	LP2
Sean Opperman	295	6-7	LP2
Sean Opperman	296	1-2	LP2
Sean Opperman	296	14-15	LP2
Sean Opperman	296	8-9	LP2
Sean Opperman	297	1-2	LP2
Sean Opperman	297	7-8	LP2
Sean Opperman	303	17-18	LP2
Sean Opperman	303	22-23	LP2
Sean Opperman	304	2	LP2
Sean Opperman	305	10-11	LP2
Sean Opperman	305	1-2	LP2
Sean Opperman	311	21-22	LP2
Sean Opperman	312	1-2	LP2
Sean Opperman	312	12-13	LP2

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Sean Opperman	312	18-19	LP2
Sean Opperman	312	24-25	LP2
Sean Opperman	312	6-7	LP2
Sean Opperman	313	11-12	LP2
Sean Opperman	313	313:18-314:3	LP2
Sean Opperman	313	4-5	LP2
Sean Opperman	314	16-17	LP2
Sean Opperman	314	24-25	LP2
Sean Opperman	314	9-10	LP2
Sean Opperman	315	12-13	LP2
Sean Opperman	315	19-20	LP2
Sean Opperman	315	23-24	LP2
Sean Opperman	315	6-7	LP2
Sean Opperman	316	12-13	LP2
Sean Opperman	316	17	LP2
Sean Opperman	316	23-24	LP2
Sean Opperman	316	3-4	LP2
Sean Opperman	317	16-17	LP2
Sean Opperman	317	24-25	LP2
Sean Opperman	317	3-4	LP2
Sean Opperman	317	9-10	LP2
Adam Foltz	100	2-3	LP2
Adam Foltz	100	11-13	LP2
Adam Foltz	100	19-20	LP2
Adam Foltz	101	1-2	LP2
Adam Foltz	108	21-22	LP2
Adam Foltz	109	22-23	LP2
Adam Foltz	110	2-3	LP2
Adam Foltz	110	13-14	LP2
Adam Foltz	112	6-7	LP2
Adam Foltz	113	10-11	LP2
Adam Foltz	113	15-17	LP2
Adam Foltz	114	3-6	LP2
Adam Foltz	115	2-3	LP2
Adam Foltz	115	7-8	LP2
Adam Foltz	115	13-14	LP2
Adam Foltz	116	10-12	LP2
Adam Foltz	118	8-10	LP2
Adam Foltz	118	21-22	LP2
Adam Foltz	119	3-4	LP2
Adam Foltz	119	22-23	LP2
Adam Foltz	120	5-9	LP2
Adam Foltz	121	9-10	LP2
Adam Foltz	137	13-16	LP2
Adam Foltz	144	22-25	LP2
Adam Foltz	145	11-13	LP2
Adam Foltz	170	22-23	LP2
Adam Foltz	171	18-19	LP2
Adam Foltz	173	5-6	LP2
Adam Foltz	173	15-16	LP2
Adam Foltz	173	21-22	LP2
Adam Foltz	174	9-10	LP2
Adam Foltz	174	15-16	LP2
Adam Foltz	180	11-12	LP2
Adam Foltz	181	8-9	LP2
Adam Foltz	183	17-18	LP2
Adam Foltz	184	21-22	LP2
Adam Foltz	186	3-4	LP2
Adam Foltz	186	9-10	LP2
Adam Foltz	187	1-2	LP2
Adam Foltz	190	15-16	LP2
Adam Foltz	190	20-21	LP2
Adam Foltz	199	11-14	LP2
Adam Foltz	200	3-6	LP2
Adam Foltz	204	3-6	LP2
Adam Foltz	205	2-5	LP2
Adam Foltz	205	10-11	LP2
Adam Foltz	212	21-22	LP2
Adam Foltz	213	10-11	LP2

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Adam Foltz	214	15-16	LP2
Adam Foltz	222	2-4	LP2
Adam Foltz	224	2-3	LP2
Adam Foltz	240	17-18	LP2
Adam Foltz	244	17-18	LP2
Adam Foltz	245	24-25	LP2
Adam Foltz	261	23-25	LP2
Adam Foltz	280	10-11	LP2
Adam Foltz	280	22-23	LP2
Adam Foltz	284	20-21	LP2
Adam Foltz	286	18-20	LP2
Adam Foltz	289	6-8	LP2
Adam Foltz	98	1-4	LP2
Adam Foltz	98	18-19	LP2
Anna Mackin	174	174:22-175:1	LP2
Anna Mackin	248	248:25-249:1	LP2
Anna Mackin	167	19	Withdrawn
Anna Mackin	167	22	Withdrawn
Anna Mackin	167	25	Withdrawn
Anna Mackin	167	12-14	LP2
Anna Mackin	168	5	LP2
Anna Mackin	168	16-19	LP2
Anna Mackin	169	3	LP2
Anna Mackin	169	6	LP2
Anna Mackin	173	20	Withdrawn
Anna Mackin	173	24	Withdrawn
Anna Mackin	173	11-17	Withdrawn
Anna Mackin	174	3	Withdrawn
Anna Mackin	174	7	Withdrawn
Anna Mackin	174	11-13	LP2
Anna Mackin	247	6	LP2
Anna Mackin	247	11-12	LP2
Anna Mackin	247	20-25	LP2
Anna Mackin	54	7-8	LP2
Anna Mackin	54	13-14	Withdrawn
Anna Mackin	55	3-4	LP2
Chris Gober	147	22	LP2
Chris Gober	173	17-20	LP2
Chris Gober	245	24-25	Grant, improper objection.
Chris Gober	266	13-15	LP2
Colleen Garcia	172	20-21	LP2
Colleen Garcia	75	18-19	LP2
Colleen Garcia	76	3	LP2
Mark Bell	122	8-9	LP2
Rep. Buckley	275	2-6	LP1
Rep. Buckley	275	7-10	LP1
Rep. Guillen	188	18-19	LP1
Rep. Guillen	189	19-20	LP1
Rep. Guillen	190	10-11	LP1
Rep. Huberty	65	9	LP1
Rep. Huberty	65	2-3	LP1
Rep. Hunter	99	99:24-100:1	LP1
Rep. Hunter	100	10	LP1
Rep. Hunter	113	19-20	LP1
Rep. Hunter	117	12-13	LP1
Rep. Hunter	124	7-9	LP1
Rep. Hunter	129	9-13	LP1
Rep. Hunter	140	11-13	LP1
Rep. Hunter	144	14-15	LP1
Rep. Hunter	242	11-17	LP1
Rep. Hunter	242	23-25	LP1
Rep. Hunter	243	6	LP1
Rep. Hunter	243	8-10	LP1
Rep. Hunter	243	24-25	LP1
Rep. Hunter	244	5-8	LP1
Rep. Hunter	265	17-18	LP1
Rep. Hunter	280	19-20	LP1
Rep. Hunter	294	10-12	LP1
Rep. Hunter	296	2-5	LP1

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Rep. Hunter	306	3-6	LP1
Rep. Hunter	306	14-15	LP1
Rep. Hunter	307	3-6	LP1
Rep. Jetton	113	113:25-114:3	LP1
Rep. Jetton	148	148:25-149:1	LP1
Rep. Jetton	180	180:24-181:2	LP1
Rep. Jetton	199	199:24-200:2	LP1
Rep. Jetton	114	9-10	LP1
Rep. Jetton	114	18-19	LP1
Rep. Jetton	114	24-25	LP1
Rep. Jetton	133	6-9	LP1
Rep. Jetton	148	4-5	LP1
Rep. Jetton	148	19-20	LP1
Rep. Jetton	149	20-21	LP1
Rep. Jetton	150	13-14	LP1
Rep. Jetton	152	4-5	LP1
Rep. Jetton	157	2-3	LP1
Rep. Jetton	157	10-11	LP1
Rep. Jetton	161	12-13	LP1
Rep. Jetton	181	9-12	LP1
Rep. Jetton	181	17-20	LP1
Rep. Jetton	187	6-9	LP1
Rep. Jetton	187	21-22	LP1
Rep. Jetton	196	5-7	LP1
Rep. Jetton	200	8-9	LP1
Rep. Jetton	200	17-19	LP1
Rep. Jetton	201	1	LP1
Rep. Jetton	201	9-11	LP1
Rep. Jetton	203	12-14	LP1
Rep. Jetton	211	2-3	LP1
Rep. Jetton	211	21-22	LP1
Rep. Jetton	212	1	LP1
Rep. Jetton	212	8-9	LP1
Rep. Jetton	212	14-16	LP1
Rep. Jetton	212	23-24	LP1
Rep. Jetton	213	7-8	LP1
Rep. Jetton	215	22-25	LP1
Rep. Jetton	48	11-12	LP1
Rep. Jetton	52	6	LP1
Rep. Jetton	52	1-2	LP1
Rep. Jetton	52	9-10	LP1
Rep. Jetton	52	16-17	LP1
Rep. Jetton	66	11-12	Withdrawn
Rep. Jetton	81	21	LP1
Rep. Jetton	81	5-7	LP1
Rep. Jetton	81	12-13	LP1
Rep. Jetton	82	1-2	LP1
Rep. Jetton	82	13-14	LP1
Rep. Jetton	82	19-20	LP1
Rep. Lozano	116	116:25-117:1	LP1
Rep. Lozano	113	8	LP1
Rep. Lozano	113	15	LP1
Rep. Lozano	129	1-2	LP1
Rep. Lozano	50	13-14	Withdrawn
Rep. Murr	91	91:25-92:1	LP1
Rep. Murr	133	5-6	LP1
Rep. Murr	133	10-11	LP1
Rep. Murr	133	21-22	LP1
Rep. Murr	136	14-15	LP1
Rep. Murr	136	20-21	LP1
Rep. Murr	137	11-12	LP1
Rep. Murr	137	16-17	LP1
Rep. Murr	137	22-23	LP1
Rep. Murr	138	6-7	LP1
Rep. Murr	140	2-3	LP1
Rep. Murr	140	13-14	LP1
Rep. Murr	90	24-25	LP1
Rep. Murr	91	3-4	LP1
Rep. Murr	91	20-21	LP1

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Rep. Murr	92	6-7	LP1
Sean Opperman	192	192:25-193:1	LP2
Sean Opperman	194	194:25-195:1	LP2
Sean Opperman	106	11-12	LP2
Sean Opperman	125	22-23	LP2
Sean Opperman	162	12-14	Withdrawn
Sean Opperman	162	23-24	LP2
Sean Opperman	192	7-8	LP2
Sean Opperman	192	12-13	LP2
Sean Opperman	192	19-20	LP2
Sean Opperman	193	10-11	LP2
Sean Opperman	195	6-7	LP2
Sean Opperman	195	14-15	LP2
Sean Opperman	195	21-22	LP2
Sean Opperman	196	20-21	LP2
Sean Opperman	197	10-11	LP2
Sean Opperman	200	22-23	LP2
Sean Opperman	213	11-16	Withdrawn
Sean Opperman	231	10-11	LP2
Sean Opperman	231	19-20	LP2
Sean Opperman	264	5-6	LP2
Sean Opperman	264	19-20	Withdrawn
Sean Opperman	266	2-3	LP2
Sean Opperman	266	15-16	LP2
Sean Opperman	266	24-25	LP2
Sean Opperman	267	3-4	LP2
Sean Opperman	267	8-9	LP2
Sean Opperman	270	15-20	LP2
Sean Opperman	294	17-18	LP2
Sean Opperman	295	1-2	LP2
Sean Opperman	295	6-7	LP2
Sean Opperman	295	11-12	LP2
Sean Opperman	52	8-9	LP2
Sean Opperman	52	21-22	LP2
Sean Opperman	53	9-10	LP2
Sean Opperman	53	22-23	LP2
Sean Opperman	57	22-23	LP2
Sean Opperman	58	13-16	LP2
Sean Opperman	59	4-7	LP2
Sean Opperman	91	13	LP2
Sean Opperman	98	2-3	LP2
Sean Opperman	98	7-9	LP2
Adam Foltz	34	21-22	LP2
Adam Foltz	92	7-9	LP2
Adam Foltz	95	7-8	LP2
Adam Foltz	101	11-12	LP2
Adam Foltz	101	18-22	LP2
Adam Foltz	106	4-5	LP2
Adam Foltz	107	17-21	LP2
Adam Foltz	108	13-14	LP2
Adam Foltz	108	21-22	LP2
Adam Foltz	116	10-12	LP2
Adam Foltz	120	20	LP2
Adam Foltz	120	15-16	LP2
Adam Foltz	121	9-10	LP2
Adam Foltz	125	5-6	LP2
Adam Foltz	126	4-5	LP2
Adam Foltz	126	126:25-127:1	LP2
Adam Foltz	126	19-20	LP2
Adam Foltz	128	4-5	LP2
Adam Foltz	128	12-13	LP2
Adam Foltz	128	22-23	LP2
Adam Foltz	129	15-16	LP2
Adam Foltz	130	9-10	LP2
Adam Foltz	135	15-18	LP2
Adam Foltz	139	22-23	LP2
Adam Foltz	140	2-3	LP4
Adam Foltz	140	9-11	LP2
Adam Foltz	140	23-24	LP2

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Adam Foltz	142	2-3	LP2
Adam Foltz	142	11-12	LP2
Adam Foltz	143	143:25-144:1	Grant, no response
Adam Foltz	144	6-7	LP2
Adam Foltz	145	21-24	LP2
Adam Foltz	149	5-6	LP2
Adam Foltz	177	19-20	LP2
Adam Foltz	179	7-8	LP2
Adam Foltz	190	190:25-191:1	LP2
Adam Foltz	191	191:25-192:1	LP2
Adam Foltz	196	4-6	LP2
Adam Foltz	197	8-9	LP2
Adam Foltz	197	18-22	LP2
Adam Foltz	198	24-25	LP2
Adam Foltz	200	12-14	LP2
Adam Foltz	200	22-23	LP2
Adam Foltz	206	4-5	LP2
Adam Foltz	219	21-22	LP2
Adam Foltz	232	6-7	LP2
Adam Foltz	232	19-20	LP2
Adam Foltz	233	6	LP2
Adam Foltz	233	1-2	LP2
Adam Foltz	233	15-16	LP2
Adam Foltz	233	20-21	LP2
Adam Foltz	234	7-8	LP2
Adam Foltz	234	13-14	LP2
Adam Foltz	234	22-23	LP2
Adam Foltz	235	5-6	LP2
Adam Foltz	235	11-12	LP2
Adam Foltz	235	16-17	LP2
Adam Foltz	236	9	LP2
Adam Foltz	236	14	LP2
Adam Foltz	236	3-4	LP2
Adam Foltz	242	13-14	LP2
Adam Foltz	245	24-25	LP2
Adam Foltz	246	24-25	LP2
Adam Foltz	250	16-17	LP2
Adam Foltz	252	5-6	LP2
Adam Foltz	254	254:25-255:1	LP2
Adam Foltz	255	15-16	LP2
Adam Foltz	260	12-14	LP2
Adam Foltz	262	11-12	LP2
Adam Foltz	262	18-19	LP2
Adam Foltz	267	6-7	LP2
Adam Foltz	267	11-12	LP2
Adam Foltz	267	16-17	LP2
Adam Foltz	268	10-11	LP2
Adam Foltz	270	11-12	LP2
Adam Foltz	281	16-17	LP2
Adam Foltz	283	5-6	LP2
Adam Foltz	283	11-12	LP2
Adam Foltz	284	20-21	LP2
Adam Foltz	286	6-7	LP2
Anna Mackin	27	27:24-28:13	LP2
Anna Mackin	28	17-20	LP2
Anna Mackin	31	3-4	LP2
Anna Mackin	52	13-14	LP2
Anna Mackin	54	20-21	LP2
Anna Mackin	171	21-22	LP2
Anna Mackin	172	2-3	LP2
Anna Mackin	172	8-9	LP2
Anna Mackin	172	15-16	LP2
Anna Mackin	172	21-22	LP2
Anna Mackin	207	2-3	LP2
Chris Gober	40	7-10	LP2
Chris Gober	142	2-3	LP2
Chris Gober	142	17-18	LP2
Chris Gober	147	7-9	LP2
Chris Gober	161	18-21	LP2

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Deponent	Starting Page Number	Line Number	Ruling
Chris Gober	173	17-20	LP4
Chris Gober	176	9-10	LP2
Chris Gober	197	20-23	LP2
Chris Gober	205	4-5	LP2
Chris Gober	206	16-19	LP2
Chris Gober	207	13-14	LP2
Chris Gober	207	207:23-208:1	LP2
Chris Gober	212	22-24	LP2
Chris Gober	220	25	LP2
Chris Gober	220	6-17	Grant, improper objection.
Chris Gober	241	17-18	LP2
Chris Gober	241	24-25	LP2
Chris Gober	242	4	LP2
Chris Gober	242	6	LP2
Chris Gober	264	264:23-265:1	LP2
Colleen Garcia	62	62:18-63:2	LP2
Colleen Garcia	65	15-16	LP2
Colleen Garcia	65	65:25-66:3	LP2
Colleen Garcia	66	11-12	LP2
Colleen Garcia	68	20-23	LP2
Colleen Garcia	69	23-25	LP2
Colleen Garcia	70	4	LP2
Colleen Garcia	70	7	LP2
Colleen Garcia	72	13-14	LP2
Colleen Garcia	72	21-22	LP2
Colleen Garcia	73	11-13	LP2
Colleen Garcia	74	14-18	LP2
Colleen Garcia	75	4	LP2
Colleen Garcia	75	10-11	LP2
Colleen Garcia	76	8-12	LP2
Colleen Garcia	76	76:22-77:10	LP2
Colleen Garcia	77	21-22	LP2
Colleen Garcia	78	9	LP2
Colleen Garcia	78	4-5	LP2
Colleen Garcia	82	23-24	LP2
Colleen Garcia	83	5-6	LP2
Colleen Garcia	83	18-19	LP2
Colleen Garcia	84	1-2	LP2
Colleen Garcia	84	6-7	LP2
Colleen Garcia	86	24-25	LP2
Colleen Garcia	120	7	LP4
Colleen Garcia	120	1-2	LP4
Colleen Garcia	121	17	LP2
Colleen Garcia	121	12-13	LP2
Colleen Garcia	123	2	LP2
Colleen Garcia	125	11-13	LP2
Colleen Garcia	128	7-8	LP2
Colleen Garcia	133	16-17	LP2
Colleen Garcia	176	1-2	LP2
Colleen Garcia	176	8-9	LP2
Colleen Garcia	185	12-13	LP2
Colleen Garcia	191	20-21	LP2
Colleen Garcia	194	20-21	LP2
Colleen Garcia	195	1-2	LP2
Colleen Garcia	201	6-7	LP2
Colleen Garcia	203	20-21	LP2
Colleen Garcia	204	1	LP2
Mark Bell	13	13:20-14:1	Withdrawn
Mark Bell	14	5	Withdrawn
Mark Bell	35	8-9	LP4
Mark Bell	42	2-4	Withdrawn
Mark Bell	42	17-18	Withdrawn
Mark Bell	43	20-21	Withdrawn
Mark Bell	44	1	Withdrawn
Mark Bell	44	6-8	LP2
Mark Bell	44	13-14	LP2
Mark Bell	44	21-23	LP2
Mark Bell	47	17-18	LP2
Mark Bell	50	20-22	LP2

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Mark Bell	51	17-18	LP2
Mark Bell	51	51:25-52:1	LP2
Mark Bell	52	7-8	LP2
Mark Bell	52	13-14	LP2
Mark Bell	52	20-21	LP2
Mark Bell	53	22-23	LP2
Mark Bell	54	6	LP2
Mark Bell	63	18-19	LP2
Mark Bell	71	4	LP2
Mark Bell	75	6-7	Grant, no response
Mark Bell	75	20-21	Grant, no response
Mark Bell	76	8	Grant, no response
Mark Bell	76	3-4	Grant, no response
Mark Bell	80	24	LP2
Mark Bell	81	8	LP2
Mark Bell	87	8-9	LP2
Mark Bell	87	14-15	LP2
Mark Bell	87	22-23	LP2
Mark Bell	101	5	LP2
Mark Bell	109	19	LP2
Mark Bell	109	6-7	LP2
Mark Bell	109	12-15	LP2
Mark Bell	125	10-11	Grant, improper objection.
Mark Bell	125	15-16	LP2
Mark Bell	130	12	LP2
Mark Bell	130	17	LP2
Mark Bell	130	6-7	LP2
Mark Bell	130	130:25-131:1	LP2
Mark Bell	153	22	LP2
Mark Bell	153	14-15	LP2
Mark Bell	154	9	LP2
Mark Bell	154	4-5	LP2
Rep. Buckley	60	60:23-61:1	LP1
Rep. Buckley	61	19-22	LP1
Rep. Buckley	61	61:23-62:3	LP1
Rep. Buckley	62	4-9	LP1
Rep. Buckley	62	10-13	LP1
Rep. Buckley	68	68:25-60:5	Grant, no response
Rep. Buckley	78	9-15	LP1
Rep. Buckley	83	83:23-84:6	LP1
Rep. Buckley	84	7-11	LP4
Rep. Buckley	85	16-24	LP1
Rep. Buckley	151	18-21	LP1
Rep. Buckley	167	6-11	LP1
Rep. Buckley	168	10-13	Grant, improper objection.
Rep. Buckley	263	8-15	LP1
Rep. Buckley	263	16-25	LP1
Rep. Buckley	264	1-12	LP1
Rep. Buckley	264	16-21	LP1
Rep. Buckley	268	1-13	LP1
Rep. Buckley	269	269:25-270:6	LP1
Rep. Buckley	270	7-12	LP1
Rep. Buckley	270	13-22	LP1
Rep. Buckley	271	13-23	LP1
Rep. Buckley	275	2-6	LP1
Rep. Buckley	275	7-10	LP1
Rep. Guillen	167	23-24	LP1
Rep. Guillen	168	168:25-169:1	LP1
Rep. Guillen	178	21-23	LP1
Rep. Guillen	186	14-15	LP1
Rep. Guillen	199	199:18-200:10	LP4
Rep. Huberty	30	14	LP1
Rep. Huberty	33	15	LP1
Rep. Huberty	66	7-9	LP1
Rep. Huberty	67	4	LP1
Rep. Hunter	21	18-19	LP1
Rep. Hunter	22	21-24	LP1
Rep. Hunter	52	19-20	LP1

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Rep. Hunter	53	5	LP1
Rep. Hunter	53	14-15	LP1
Rep. Hunter	53	20-25	LP1
Rep. Hunter	54	24-25	LP1
Rep. Hunter	55	17	LP1
Rep. Hunter	55	11-12	LP1
Rep. Hunter	55	21-25	LP1
Rep. Hunter	61	15	LP1
Rep. Hunter	61	9-10	LP1
Rep. Hunter	62	23-24	Grant, improper objection.
Rep. Hunter	70	9-10	LP1
Rep. Hunter	73	9-11	LP3
Rep. Hunter	73	18-19	LP3
Rep. Hunter	74	21-22	LP3
Rep. Hunter	75	1-2	LP3
Rep. Hunter	75	75:25-76:6	LP1
Rep. Hunter	77	9-10	LP1
Rep. Hunter	77	22-23	LP1
Rep. Hunter	83	11-12	LP1
Rep. Hunter	83	15-19	LP1
Rep. Hunter	116	7-8	LP1
Rep. Hunter	128	14-15	LP1
Rep. Hunter	135	8-9	LP1
Rep. Hunter	136	136:25-137:1	LP1
Rep. Hunter	137	7-8	LP1
Rep. Hunter	137	16-17	LP1
Rep. Hunter	141	10-11	LP1
Rep. Hunter	145	10-11	LP1
Rep. Hunter	146	5-6	LP1
Rep. Hunter	148	7-8	LP1
Rep. Hunter	150	16-18	Grant, improper objection.
Rep. Hunter	176	13-14	LP1
Rep. Hunter	180	19-20	LP1
Rep. Hunter	196	15-17	LP1
Rep. Hunter	196	196:24-197:4	LP1
Rep. Hunter	197	18	LP1
Rep. Hunter	234	14	LP1
Rep. Hunter	234	8-9	LP1
Rep. Hunter	234	23-24	LP1
Rep. Hunter	245	14-15	Grant, improper objection.
Rep. Hunter	248	4-7	LP1
Rep. Hunter	248	20-23	LP1
Rep. Hunter	249	8-12	LP1
Rep. Hunter	257	18	LP1
Rep. Hunter	266	266:25-267:1	LP1
Rep. Hunter	288	23	LP1
Rep. Hunter	288	15-19	LP1
Rep. Hunter	296	2-5	LP1
Rep. Jetton	32	3-5	Withdrawn
Rep. Jetton	41	10	LP1
Rep. Jetton	41	14	LP1
Rep. Jetton	41	6-7	LP1
Rep. Jetton	42	25	LP1
Rep. Jetton	42	20-22	LP1
Rep. Jetton	43	4-5	LP1
Rep. Jetton	43	12-15	LP1
Rep. Jetton	43	20-21	LP1
Rep. Jetton	44	2-3	LP1
Rep. Jetton	45	15-16	LP1
Rep. Jetton	47	23-24	LP1
Rep. Jetton	63	20-23	LP1
Rep. Jetton	64	4-5	LP4
Rep. Jetton	69	20	LP1
Rep. Jetton	69	12-14	LP1
Rep. Jetton	72	9-11	LP1
Rep. Jetton	72	15-17	LP1
Rep. Jetton	84	7-11	LP1
Rep. Jetton	84	15-16	LP1

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Rep. Jetton	87	23-24	LP1
Rep. Jetton	92	16-18	LP1
Rep. Jetton	117	20-21	LP1
Rep. Jetton	119	3-4	LP1
Rep. Jetton	129	4-5	LP1
Rep. Jetton	129	9-10	LP1
Rep. Jetton	142	20-21	LP1
Rep. Jetton	149	6-7	LP1
Rep. Jetton	170	23-25	LP1
Rep. Jetton	176	176:25-177:1	LP1
Rep. Jetton	178	2-3	LP1
Rep. Jetton	188	12-15	LP1
Rep. Jetton	196	5-7	LP1
Rep. Jetton	213	12-14	LP1
Rep. Jetton	216	5	LP1
Rep. Jetton	216	11-12	LP1
Rep. Jetton	216	22-23	LP1
Rep. Jetton	217	16-19	LP1
Rep. Jetton	227	2-4	LP1
Rep. Jetton	233	9-10	LP1
Rep. Landgraf	177	22-23	LP1
Rep. Landgraf	178	11-12	LP1
Rep. Landgraf	178	22-23	LP1
Rep. Landgraf	179	17-18	LP1
Rep. Landgraf	189	3-4	LP1
Rep. Landgraf	191	17-18	LP1
Rep. Landgraf	191	24-25	LP1
Rep. Landgraf	192	17-18	LP1
Rep. Landgraf	246	246:25-247:2	LP1
Rep. Landgraf	264	13-14	LP1
Rep. Landgraf	265	6-7	LP1
Rep. Landgraf	265	23-24	LP1
Rep. Landgraf	266	6-19	LP1
Rep. Landgraf	276	22-23	LP1
Rep. Landgraf	288	20-21	LP1
Rep. Lozano	49	12-13	LP1
Rep. Lozano	50	13-14	Withdrawn
Rep. Lozano	89	19-20	LP1
Rep. Lozano	89	89:24-90:1	LP1
Rep. Lozano	90	6	LP1
Rep. Lozano	97	22-23	LP1
Rep. Lozano	98	11-12	LP1
Rep. Lozano	98	22-23	LP1
Rep. Lozano	99	2	LP1
Rep. Murr	76	19-20	LP1
Rep. Murr	77	12-13	LP1
Rep. Murr	77	17-18	LP1
Rep. Murr	78	8-9	LP1
Rep. Murr	85	23-24	LP1
Rep. Murr	86	2-3	LP1
Rep. Murr	86	22-23	LP1
Rep. Murr	87	3-4	LP1
Rep. Murr	87	18-19	LP1
Rep. Murr	87	23-24	LP1
Rep. Murr	88	5-6	LP1
Rep. Murr	88	12-13	LP1
Rep. Murr	110	3-4	LP1
Rep. Murr	111	4-5	LP1
Rep. Murr	111	19-20	Grant, no response
Rep. Murr	112	7-8	LP1
Rep. Murr	112	12-13	LP1
Rep. Murr	115	1-2	LP1
Rep. Murr	116	4-5	LP1
Rep. Murr	116	9-10	LP1
Rep. Murr	116	19-20	LP1
Rep. Murr	117	4-5	LP1
Rep. Murr	118	5-6	LP1
Rep. Murr	118	11-12	LP1

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Rep. Murr	119	5-6	LP1
Rep. Murr	119	10-11	LP1
Rep. Murr	122	10-11	LP1
Rep. Murr	122	23-24	LP1
Rep. Murr	123	4-5	LP1
Rep. Murr	123	15-16	LP1
Rep. Murr	123	19-20	LP1
Rep. Murr	124	2-3	Grant, no response
Rep. Murr	130	24-25	LP1
Rep. Murr	142	142:25-143:1	LP1
Rep. Murr	143	5-6	LP1
Rep. Murr	143	12-13	Grant, no response
Rep. Murr	143	22-23	LP1
Rep. Murr	144	11-12	LP1
Rep. Murr	144	144:25-145:1	LP1
Rep. Murr	144	19-20	Grant, no response
Rep. Murr	145	5-6	LP1
Rep. Murr	147	24-25	LP1
Rep. Murr	148	15-16	LP1
Rep. Murr	148	21-22	LP1
Sean Opperman	63	12-13	LP2
Sean Opperman	64	4-5	LP2
Sean Opperman	64	11-12	LP2
Sean Opperman	78	78:25-79:1	LP2
Sean Opperman	79	13-14	LP2
Sean Opperman	83	2-3	LP2
Sean Opperman	83	7-8	LP2
Sean Opperman	83	12-13	LP2
Sean Opperman	83	17-18	LP2
Sean Opperman	83	83:25-84:1	LP2
Sean Opperman	84	11-12	LP2
Sean Opperman	85	1-2	LP2
Sean Opperman	85	8-9	LP2
Sean Opperman	85	16-17	LP2
Sean Opperman	85	85:25-86:1	LP2
Sean Opperman	88	14-18	LP2
Sean Opperman	90	3-4	LP2
Sean Opperman	103	103:23-104:1	Withdrawn
Sean Opperman	104	25	LP2
Sean Opperman	120	13-15	LP2
Sean Opperman	120	23-25	LP2
Sean Opperman	121	7-9	LP2
Sean Opperman	121	121:22-122:2	LP2
Sean Opperman	128	16-17	LP2
Sean Opperman	151	9-10	LP2
Sean Opperman	161	19-20	LP2
Sean Opperman	162	3-4	LP2
Sean Opperman	189	189:23-190:4	LP2
Sean Opperman	191	24-25	Grant, improper objection.
Sean Opperman	199	199:25-200:3	LP2
Sean Opperman	200	6	LP2
Sean Opperman	209	3-5	LP4
Sean Opperman	209	13-14	LP2
Sean Opperman	209	21-22	LP2
Sean Opperman	210	18-19	LP2
Sean Opperman	210	210:25-211:1	LP2
Sean Opperman	211	15-16	LP2
Sean Opperman	232	5-7	LP2
Sean Opperman	293	15-16	LP2
Sean Opperman	303	17-18	LP2
Sean Opperman	303	22-23	LP2
Sean Opperman	304	2	LP2
Sean Opperman	321	11-12	LP2
Adam Foltz	106	4-5	LP2
Adam Foltz	118	21-22	LP2
Adam Foltz	126	126:25-127:1	LP4
Adam Foltz	127	13-14	LP2
Adam Foltz	134	17-18	LP2
Adam Foltz	138	12-13	LP2

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Adam Foltz	142	11-12	LP2
Adam Foltz	142	2-3	LP2
Adam Foltz	177	19-20	LP2
Adam Foltz	178	9-10	LP2
Adam Foltz	179	7-8	LP2
Adam Foltz	184	21-22	LP2
Adam Foltz	184	6-7	LP2
Adam Foltz	190	20-21	LP2
Adam Foltz	232	19-20	LP2
Adam Foltz	232	6-7	LP2
Adam Foltz	233	15-16	LP2
Adam Foltz	233	20-21	LP2
Adam Foltz	233	6	LP2
Adam Foltz	234	13-14	LP2
Adam Foltz	234	22-23	LP2
Adam Foltz	234	2-3	LP2
Adam Foltz	234	7-8	LP2
Adam Foltz	235	11-12	LP2
Adam Foltz	235	16-17	LP2
Adam Foltz	235	5-6	LP2
Adam Foltz	240	10-11	LP2
Adam Foltz	240	17-18	LP2
Adam Foltz	240	21-22	LP2
Adam Foltz	240	3-4	LP2
Adam Foltz	241	241:25-242:1	Grant, no response
Adam Foltz	242	13-14	LP2
Adam Foltz	246	24-25	LP2
Adam Foltz	254	16-17	LP2
Adam Foltz	255	15-16	LP2
Adam Foltz	260	12-14	LP2
Adam Foltz	260	20-21	LP2
Adam Foltz	261	3-4	LP2
Adam Foltz	287	11-12	LP2
Anna Mackin	26	24-25	LP2
Anna Mackin	27	18-19	LP2
Anna Mackin	27	27:24-28:13	LP2
Anna Mackin	28	17-20	LP2
Anna Mackin	30	22-23	LP2
Anna Mackin	31	11-12	LP2
Anna Mackin	31	24-25	LP2
Anna Mackin	31	3-4	LP2
Anna Mackin	32	10-11	LP2
Anna Mackin	32	32:25-33:1	LP2
Anna Mackin	33	13-14	LP2
Anna Mackin	33	21-22	LP2
Anna Mackin	34	11-12	LP2
Anna Mackin	37	23-24	LP2
Anna Mackin	38	4-5	LP2
Anna Mackin	48	4-7	LP2
Anna Mackin	52	13-14	LP2
Anna Mackin	112	11-12	Withdrawn
Anna Mackin	112	17-18	Withdrawn
Anna Mackin	113	14-15	Withdrawn
Anna Mackin	113	21-22	LP2
Anna Mackin	113	3-4	Withdrawn
Anna Mackin	113	9-10	Withdrawn
Anna Mackin	114	14	Withdrawn
Anna Mackin	114	17	Withdrawn
Anna Mackin	114	20-21	Withdrawn
Anna Mackin	114	5-6	Withdrawn
Anna Mackin	114	9	Withdrawn
Anna Mackin	115	11-12	LP2
Anna Mackin	116	1-2	LP2
Anna Mackin	116	14-15	LP2
Anna Mackin	117	15-16	Grant, improper objection.
Anna Mackin	117	4-5	LP2
Anna Mackin	136	14-15	Grant, improper objection.
Anna Mackin	143	18-19	LP2
Anna Mackin	144	17-18	LP2

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Anna Mackin	145	12	LP2
Anna Mackin	145	17-20	LP2
Anna Mackin	145	8-9	LP2
Anna Mackin	170	16-18	Withdrawn
Anna Mackin	171	13-18	LP2
Anna Mackin	254	13-15	LP4
Anna Mackin	254	254:22-255:1	LP4
Anna Mackin	257	6-11	LP2
Chris Gober	40	7-10	LP2
Chris Gober	91	91:25-92:1	LP2
Chris Gober	92	22-23	LP2
Chris Gober	93	15-16	LP2
Chris Gober	94	16-17	LP2
Chris Gober	114	21-23	Grant, improper objection.
Chris Gober	134	2-4	LP2
Chris Gober	142	17-18	LP2
Chris Gober	142	2-3	LP2
Chris Gober	147	22	LP2
Chris Gober	147	7-9	LP2
Chris Gober	154	11-12	LP2
Chris Gober	154	20-21	LP2
Chris Gober	155	9-10	LP2
Chris Gober	161	18-21	LP2
Chris Gober	162	20-21	Grant, improper objection.
Chris Gober	170	23-24	LP2
Chris Gober	197	2-3	Grant, improper objection.
Chris Gober	218	14-16	LP2
Chris Gober	220	25	LP2
Chris Gober	220	6-17	Grant, improper objection.
Chris Gober	224	2-3	LP2
Chris Gober	252	20-21	LP2
Chris Gober	252	8-10	LP2
Chris Gober	262	6-7	LP2
Chris Gober	264	264:23-265:1	LP2
Colleen Garcia	46	21-22	LP2
Colleen Garcia	54	12-18	LP2
Colleen Garcia	62	62:18-63:2	LP2
Colleen Garcia	65	15-16	LP2
Colleen Garcia	65	65:25-66:3	LP2
Colleen Garcia	69	23-25	LP2
Colleen Garcia	70	4	LP2
Colleen Garcia	70	7	LP2
Colleen Garcia	74	14-18	LP2
Colleen Garcia	83	18-19	LP2
Colleen Garcia	84	1-2	LP2
Colleen Garcia	84	6-7	LP2
Colleen Garcia	91	17-19	LP2
Colleen Garcia	120	1-2	LP4
Colleen Garcia	120	7	LP4
Colleen Garcia	121	12-13	LP2
Colleen Garcia	121	17	LP2
Colleen Garcia	121	22-23	LP2
Colleen Garcia	122	14-15	LP2
Colleen Garcia	122	22-23	LP2
Colleen Garcia	123	2	Grant, no response
Colleen Garcia	125	11-13	LP2
Colleen Garcia	128	13	LP2
Colleen Garcia	128	24-25	LP2
Colleen Garcia	128	7-8	LP2
Colleen Garcia	132	17-18	LP2
Colleen Garcia	133	16-17	LP2
Colleen Garcia	133	8-10	LP2
Colleen Garcia	140	2-3	LP2
Colleen Garcia	141	141:25-142:1	LP2
Colleen Garcia	142	5	LP2
Colleen Garcia	144	20-21	LP2
Colleen Garcia	144	9-10	LP2
Colleen Garcia	145	22-23	LP2

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Colleen Garcia	148	10-11	LP2
Colleen Garcia	150	9-10	LP2
Colleen Garcia	157	4-5	LP2
Colleen Garcia	159	18-19	LP2
Colleen Garcia	160	11-12	LP2
Colleen Garcia	160	19	LP2
Colleen Garcia	161	3-4	LP2
Colleen Garcia	163	18-19	LP2
Colleen Garcia	167	167:25-168:1	LP2
Colleen Garcia	169	13-14	LP2
Colleen Garcia	170	11	LP2
Colleen Garcia	170	17	LP2
Colleen Garcia	170	170:25-171:1	LP2
Colleen Garcia	170	5-6	LP2
Colleen Garcia	171	16-17	LP2
Colleen Garcia	171	9-10	LP2
Colleen Garcia	172	9	LP2
Colleen Garcia	176	13-14	LP2
Colleen Garcia	176	8-9	LP2
Colleen Garcia	178	19-20	LP2
Colleen Garcia	178	25	LP2
Colleen Garcia	180	12-13	LP2
Colleen Garcia	180	21	LP2
Colleen Garcia	182	19-20	LP2
Colleen Garcia	182	3-4	LP2
Colleen Garcia	183	21-23	LP2
Colleen Garcia	183	8-9	LP2
Colleen Garcia	185	12-13	LP2
Colleen Garcia	185	20-21	LP2
Colleen Garcia	186	1-2	LP2
Colleen Garcia	190	15	LP2
Colleen Garcia	190	19	LP2
Colleen Garcia	190	23-24	LP2
Colleen Garcia	191	12	LP2
Colleen Garcia	191	8	LP2
Colleen Garcia	192	12-14	LP2
Colleen Garcia	193	3-4	LP2
Colleen Garcia	193	8	LP2
Colleen Garcia	194	20-21	LP2
Colleen Garcia	195	1-2	LP2
Colleen Garcia	197	11-13	LP2
Colleen Garcia	200	13	LP2
Colleen Garcia	201	6-7	LP2
Colleen Garcia	202	23-24	LP2
Colleen Garcia	203	20-21	LP2
Colleen Garcia	204	1	LP2
Colleen Garcia	215	20-21	LP2
Colleen Garcia	216	16-17	LP2
Colleen Garcia	216	24-25	LP2
Colleen Garcia	216	9-10	LP2
Colleen Garcia	217	7-9	LP2
Mark Bell	34	19-20	LP2
Mark Bell	35	23-24	LP2
Mark Bell	35	8-9	LP4
Mark Bell	36	14-15	LP2
Mark Bell	36	5-6	LP2
Mark Bell	42	17-18	Withdrawn
Mark Bell	42	2-4	Withdrawn
Mark Bell	43	20-21	Withdrawn
Mark Bell	44	1	Withdrawn
Mark Bell	44	13-14	LP2
Mark Bell	44	21-23	LP2
Mark Bell	44	6-8	LP2
Mark Bell	47	17-18	LP2
Mark Bell	50	12-13	LP2
Mark Bell	50	20-22	LP2
Mark Bell	51	17-18	LP2
Mark Bell	51	51:25-52:1	LP2

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Mark Bell	52	13-14	LP2
Mark Bell	52	20-21	LP2
Mark Bell	52	7-8	LP2
Mark Bell	53	10-11	LP2
Mark Bell	53	22-23	LP2
Mark Bell	53	2-4	LP2
Mark Bell	54	11-12	LP2
Mark Bell	54	6	LP2
Mark Bell	63	18-19	LP2
Mark Bell	71	4	LP2
Mark Bell	84	19-20	LP2
Mark Bell	86	1-3	LP2
Mark Bell	86	20-22	LP2
Mark Bell	87	14-15	LP2
Mark Bell	87	2	LP2
Mark Bell	87	22-23	LP2
Mark Bell	87	8-9	LP2
Mark Bell	101	11-12	LP2
Mark Bell	101	15	LP2
Mark Bell	102	4	LP2
Mark Bell	103	13-14	LP2
Mark Bell	109	12-15	LP2
Mark Bell	122	8-9	LP2
Mark Bell	124	11-12	LP2
Mark Bell	125	10-11	LP2
Mark Bell	125	15-16	LP2
Mark Bell	129	19-20	LP2
Mark Bell	130	12	LP2
Mark Bell	130	17	LP2
Mark Bell	153	14-15	LP2
Rep. Buckley	60	60:23-61:1	LP1
Rep. Buckley	61	19-22	LP1
Rep. Buckley	61	61:23-62:3	LP1
Rep. Buckley	62	10-13	LP1
Rep. Buckley	62	4-9	LP1
Rep. Buckley	68	68:25-60:5	LP1
Rep. Buckley	83	83:23-84:6	LP1
Rep. Buckley	84	7-11	LP1
Rep. Buckley	85	16-24	LP1
Rep. Buckley	167	14-24	LP1
Rep. Buckley	167	167:25-168:5	LP1
Rep. Buckley	263	16-25	LP1
Rep. Buckley	263	8-15	LP1
Rep. Buckley	264	1-12	LP1
Rep. Buckley	264	16-21	LP1
Rep. Buckley	268	1-13	LP1
Rep. Buckley	269	269:25-270:6	LP1
Rep. Buckley	270	13-22	LP1
Rep. Buckley	270	7-12	LP1
Rep. Buckley	271	13-23	LP1
Rep. Guillen	169	9-10	LP1
Rep. Guillen	178	21-23	LP1
Rep. Huberty	15	22-23	LP1
Rep. Huberty	30	14	LP1
Rep. Huberty	34	25	LP1
Rep. Hunter	28	16-18	LP1
Rep. Hunter	28	28:25-29:1	LP1
Rep. Hunter	29	15-16	LP1
Rep. Hunter	29	20-21	LP1
Rep. Hunter	29	6-10	LP1
Rep. Hunter	30	2	LP1
Rep. Hunter	30	23-24	LP1
Rep. Hunter	31	11-14	LP1
Rep. Hunter	31	4-5	LP1
Rep. Hunter	50	10-11	LP1
Rep. Hunter	50	19-20	LP1
Rep. Hunter	50	25	LP1
Rep. Hunter	51	14-15	LP1

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Rep. Hunter	51	4	LP1
Rep. Hunter	51	9-10	LP1
Rep. Hunter	52	1-2	LP1
Rep. Hunter	52	14-15	LP1
Rep. Hunter	52	19-20	LP1
Rep. Hunter	52	52:25-53:1	LP1
Rep. Hunter	52	9-10	LP1
Rep. Hunter	53	14-15	LP1
Rep. Hunter	53	5	LP1
Rep. Hunter	61	15	LP1
Rep. Hunter	61	9-10	LP1
Rep. Hunter	62	23-24	Grant, improper objection.
Rep. Hunter	63	3-4	LP1
Rep. Hunter	64	4-9	LP1
Rep. Hunter	70	9-10	LP1
Rep. Hunter	71	15-22	LP1
Rep. Hunter	72	15-20	LP1
Rep. Hunter	73	18-19	LP3
Rep. Hunter	73	9-11	LP3
Rep. Hunter	74	21-22	LP3
Rep. Hunter	75	1-2	LP3
Rep. Hunter	77	22-23	LP1
Rep. Hunter	77	9-10	LP1
Rep. Hunter	82	19-20	LP1
Rep. Hunter	83	15-19	LP1
Rep. Hunter	83	3-4	LP1
Rep. Hunter	99	99:24-100:1	LP1
Rep. Hunter	100	10	LP1
Rep. Hunter	100	100:25-101:1	LP1
Rep. Hunter	100	18-19	LP1
Rep. Hunter	117	12-13	LP1
Rep. Hunter	118	2-3	LP1
Rep. Hunter	134	134:25-135:1	LP1
Rep. Hunter	140	11-13	LP1
Rep. Hunter	143	10-11	LP1
Rep. Hunter	143	2-3	LP1
Rep. Hunter	144	3-4	LP1
Rep. Hunter	152	11-12	LP1
Rep. Hunter	152	18	LP1
Rep. Hunter	153	15	LP1
Rep. Hunter	153	7-8	LP1
Rep. Hunter	217	217:24-218:2	LP1
Rep. Hunter	218	12-14	LP1
Rep. Hunter	228	12-13	LP1
Rep. Hunter	228	18-19	LP1
Rep. Hunter	231	20-22	LP1
Rep. Hunter	231	5-6	LP1
Rep. Hunter	232	8-11	Grant, improper objection.
Rep. Hunter	234	14	LP1
Rep. Hunter	234	23-24	LP1
Rep. Hunter	234	8-9	LP1
Rep. Hunter	269	7-10	LP1
Rep. Hunter	288	15-19	LP1
Rep. Hunter	288	23	LP1
Rep. Jetton	32	11-12	Withdrawn
Rep. Jetton	32	3-5	Withdrawn
Rep. Jetton	42	20-22	LP1
Rep. Jetton	42	25	LP1
Rep. Jetton	43	20-21	LP1
Rep. Jetton	43	4-5	LP1
Rep. Jetton	45	15-16	LP1
Rep. Jetton	45	8-9	LP1
Rep. Jetton	47	23-24	LP1
Rep. Jetton	51	13-15	LP1
Rep. Jetton	54	14-15	LP1
Rep. Jetton	54	20-21	LP1
Rep. Jetton	55	14-15	LP1
Rep. Jetton	58	3-4	LP1

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Rep. Jetton	58	8	LP1
Rep. Jetton	69	20	LP1
Rep. Jetton	72	9-11	LP1
Rep. Jetton	142	142:25-143:1	LP1
Rep. Jetton	170	23-25	LP1
Rep. Jetton	176	176:25-177:1	LP1
Rep. Jetton	215	13-16	LP1
Rep. Jetton	215	1-5	LP1
Rep. Jetton	217	6-8	LP1
Rep. Jetton	218	13	LP1
Rep. Jetton	218	4-7	LP1
Rep. Jetton	233	18-22	LP1
Rep. Jetton	233	9-10	LP1
Rep. Landgraf	60	12-13	LP1
Rep. Landgraf	60	5-8	LP1
Rep. Landgraf	69	10-18	Grant, improper objection.
Rep. Landgraf	70	19-21	LP1
Rep. Landgraf	70	5-7	LP1
Rep. Landgraf	74	4-6	Grant, improper objection.
Rep. Landgraf	157	20-21	LP1
Rep. Landgraf	159	6-7	LP1
Rep. Landgraf	273	3-4	Grant, improper objection.
Rep. Landgraf	284	13-16	LP1
Rep. Lozano	50	13-14	Withdrawn
Rep. Lozano	97	22-23	LP1
Rep. Murr	84	11-12	LP1
Rep. Murr	84	21-22	LP1
Rep. Murr	85	11-12	LP1
Rep. Murr	85	17-18	LP1
Rep. Murr	103	17-18	LP1
Rep. Murr	110	3-4	LP1
Rep. Murr	112	12-13	LP1
Rep. Murr	112	7-8	LP1
Rep. Murr	113	8-9	LP1
Rep. Murr	115	1-2	LP1
Rep. Murr	116	4-5	LP1
Rep. Murr	118	17-18	LP1
Rep. Murr	119	15-16	LP1
Rep. Murr	119	20-21	LP1
Rep. Murr	119	24-25	LP1
Rep. Murr	121	10-11	LP1
Rep. Murr	121	2-3	LP1
Rep. Murr	130	24-25	LP1
Rep. Murr	133	21-22	LP1
Rep. Murr	133	5-6	LP1
Rep. Murr	146	21-22	Withdrawn
Rep. Murr	147	19-20	LP1
Rep. Murr	147	8-9	Withdrawn
Rep. Murr	149	149:25-150:1	LP1
Rep. Murr	159	23-24	LP1
Rep. Murr	159	7-8	LP1
Sean Opperman	76	15-17	LP2
Sean Opperman	76	76:24-77:1	Withdrawn
Sean Opperman	77	14-15	LP2
Sean Opperman	77	21-24	LP2
Sean Opperman	77	5-8	Withdrawn
Sean Opperman	78	78:25-79:1	LP2
Sean Opperman	79	13-14	LP2
Sean Opperman	83	12-13	LP2
Sean Opperman	83	17-18	LP2
Sean Opperman	83	2-3	LP2
Sean Opperman	83	7-8	LP2
Sean Opperman	83	83:25-84:1	LP2
Sean Opperman	84	11-12	LP2
Sean Opperman	85	1-2	LP2
Sean Opperman	85	85:25-86:1	LP2
Sean Opperman	88	14-18	LP2
Sean Opperman	151	9-10	LP2
Sean Opperman	155	12-17	Withdrawn

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Sean Opperman	161	19-20	LP2
Sean Opperman	162	12-14	Withdrawn
Sean Opperman	162	23-24	LP2
Sean Opperman	162	3-4	LP2
Sean Opperman	176	176:21-177:1	Withdrawn
Sean Opperman	177	12-17	LP2
Sean Opperman	177	22-24	LP2
Sean Opperman	177	5	Withdrawn
Sean Opperman	188	13-15	LP2
Sean Opperman	188	21	LP2
Sean Opperman	189	189:23-190:4	LP2
Sean Opperman	190	13	LP2
Sean Opperman	191	24-25	LP2
Sean Opperman	192	12-13	LP2
Sean Opperman	192	192:25-193:1	LP2
Sean Opperman	192	19-20	LP2
Sean Opperman	192	7-8	LP2
Sean Opperman	193	10-11	LP2
Sean Opperman	194	194:25-195:1	LP2
Sean Opperman	195	14-15	LP2
Sean Opperman	195	21-22	LP2
Sean Opperman	195	6-7	LP2
Sean Opperman	196	20-21	LP2
Sean Opperman	197	10-11	LP2
Sean Opperman	199	199:25-200:3	LP2
Sean Opperman	200	22-23	LP2
Sean Opperman	200	6	LP2
Sean Opperman	209	13-14	LP2
Sean Opperman	209	21-22	LP2
Sean Opperman	209	3-5	LP2
Sean Opperman	210	18-19	LP2
Sean Opperman	210	210:25-211:1	LP2
Sean Opperman	211	15-16	LP2
Sean Opperman	213	11-16	Withdrawn
Sean Opperman	217	4-6	LP2
Sean Opperman	219	5-8	LP2
Sean Opperman	225	10-12	LP2
Sean Opperman	225	17-18	LP2
Sean Opperman	226	9-10	LP2
Sean Opperman	263	15-17	LP2
Sean Opperman	263	21-22	LP2
Sean Opperman	263	5-6	LP2
Sean Opperman	264	19-20	LP2
Sean Opperman	264	5-6	Withdrawn
Sean Opperman	266	15-16	LP2
Sean Opperman	266	2-3	LP2
Sean Opperman	266	24-25	LP2
Sean Opperman	267	15-16	LP2
Sean Opperman	267	267:25-268:1	LP2
Sean Opperman	267	3-4	LP2
Sean Opperman	267	8-9	LP2
Sean Opperman	309	16-17	LP2
Sean Opperman	309	309:22-310:7	LP2
Sean Opperman	310	15-16	LP2
Sean Opperman	310	21-23	LP2
Sean Opperman	318	10-11	LP2
Sean Opperman	318	15	LP2
Sean Opperman	318	23-24	LP2
Sean Opperman	318	5-6	LP2
Sean Opperman	319	18-19	LP2
Sean Opperman	319	23	LP2
Sean Opperman	319	8-9	LP2
Sean Opperman	320	12-13	LP2
Sean Opperman	320	18-19	LP2
Sean Opperman	320	5-6	LP2
Sean Opperman	321	11-12	LP2
Adam Foltz	119	17-18	LP2
Adam Foltz	180	11-12	LP2
Adam Foltz	181	8-9	LP2

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Adam Foltz	184	6-7	LP2
Adam Foltz	191	191:25-192:1	LP2
Adam Foltz	194	15-16	LP2
Adam Foltz	212	21-22	LP2
Adam Foltz	225	23-24	LP2
Adam Foltz	226	9-10	LP2
Adam Foltz	226	17-18	LP2
Adam Foltz	226	24-25	LP2
Adam Foltz	251	21-22	LP3
Adam Foltz	252	5-6	LP2
Adam Foltz	252	18-19	LP2
Adam Foltz	261	23-25	LP2
Adam Foltz	270	1-2	LP2
Adam Foltz	281	16-17	LP2
Anna Mackin	120	3-7	Withdrawn
Anna Mackin	120	12-13	Withdrawn
Anna Mackin	121	13	LP4
Anna Mackin	121	6-8	LP4
Anna Mackin	121	23-25	LP4
Anna Mackin	122	12-13	LP4
Anna Mackin	122	19-20	LP4
Anna Mackin	123	2	LP4
Anna Mackin	123	12-15	LP2
Anna Mackin	124	1	Withdrawn
Anna Mackin	124	5	LP3
Anna Mackin	124	21	LP4
Anna Mackin	125	2	LP3
Anna Mackin	125	8-11	LP4
Anna Mackin	149	24	LP2
Anna Mackin	149	18-19	Withdrawn
Anna Mackin	238	1-2	LP2
Anna Mackin	238	6-7	LP2
Anna Mackin	239	21-22	LP2
Anna Mackin	247	6	LP2
Anna Mackin	248	12-15	LP2
Anna Mackin	263	3-4	LP2
Chris Gober	280	20-25	LP2
Colleen Garcia	73	11-13	LP2
Colleen Garcia	73	22-23	LP2
Colleen Garcia	132	17-18	LP3
Colleen Garcia	160	19	LP2
Colleen Garcia	204	10-11	LP2
Mark Bell	75	6-7	LP3
Mark Bell	129	19-20	LP2
Mark Bell	130	12	LP2
Rep. Guillen	178	21-23	LP1
Rep. Huberty	24	25	LP1
Rep. Hunter	22	21-24	LP1
Rep. Hunter	64	4-9	LP1
Rep. Hunter	64	15-16	LP1
Rep. Hunter	64	21-22	LP1
Rep. Hunter	65	2-3	LP1
Rep. Hunter	65	13-16	LP1
Rep. Hunter	66	25	LP1
Rep. Hunter	66	16-17	LP1
Rep. Hunter	70	9-10	LP1
Rep. Hunter	71	15-22	LP1
Rep. Hunter	72	15-20	LP1
Rep. Hunter	73	9-11	LP4
Rep. Hunter	73	18-19	LP4
Rep. Hunter	74	21-22	LP4
Rep. Hunter	75	1-2	LP4
Rep. Hunter	75	75:25-76:6	LP4
Rep. Hunter	77	9-10	LP1
Rep. Hunter	77	22-23	LP1
Rep. Hunter	83	15-19	LP1
Rep. Hunter	112	4-8	Withdrawn
Rep. Hunter	112	15-16	Withdrawn
Rep. Hunter	118	2-3	LP1

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Rep. Hunter	150	16-18	Grant, improper objection.
Rep. Hunter	152	11-12	LP1
Rep. Hunter	155	15-16	LP1
Rep. Hunter	157	18-21	LP1
Rep. Hunter	159	3-5	Withdrawn
Rep. Hunter	181	2	LP1
Rep. Hunter	184	22-23	LP4
Rep. Hunter	186	13-14	LP1
Rep. Hunter	188	13-15	LP1
Rep. Hunter	195	22-24	LP1
Rep. Hunter	196	8-12	LP1
Rep. Hunter	217	217:24-218:2	LP1
Rep. Hunter	218	12-14	LP1
Rep. Hunter	234	14	LP1
Rep. Hunter	234	8-9	LP1
Rep. Hunter	234	23-24	LP4
Rep. Hunter	251	17-20	LP1
Rep. Hunter	251	251:25-252:1	LP1
Rep. Hunter	252	3	LP1
Rep. Hunter	256	3	LP4
Rep. Hunter	256	10-14	LP1
Rep. Hunter	257	18	LP4
Rep. Hunter	265	17-18	LP1
Rep. Hunter	267	14-15	LP4
Rep. Hunter	303	12-13	LP1
Rep. Jetton	44	7-10	LP1
Rep. Jetton	44	20-21	LP1
Rep. Jetton	51	3-4	LP3
Rep. Jetton	69	1-3	LP1
Rep. Jetton	69	69:24-70:1	LP1
Rep. Jetton	70	7-8	LP1
Rep. Jetton	70	20-22	LP1
Rep. Jetton	71	3-4	LP1
Rep. Jetton	72	1-2	LP1
Rep. Jetton	72	21-24	LP1
Rep. Jetton	110	5-6	LP1
Rep. Jetton	110	11-13	LP1
Rep. Jetton	133	6-9	LP1
Rep. Jetton	140	15-18	LP1
Rep. Jetton	163	163:25-164:1	LP1
Rep. Jetton	195	22-25	LP1
Rep. Jetton	214	17-18	LP1
Rep. Jetton	221	12-13	LP1
Rep. Jetton	225	17-20	LP1
Rep. Landgraf	108	21-22	LP1
Rep. Landgraf	118	11-12	LP1
Rep. Landgraf	135	7-8	LP1
Rep. Landgraf	135	12-13	LP3
Rep. Landgraf	135	17-18	LP3
Rep. Landgraf	135	22-23	LP3
Rep. Landgraf	182	11-12	LP1
Rep. Landgraf	189	3-4	LP1
Rep. Landgraf	204	19-20	LP1
Rep. Landgraf	235	11-12	LP3
Rep. Landgraf	261	23-24	LP1
Rep. Lozano	26	3-5	Withdrawn
Rep. Lozano	62	19-21	LP1
Rep. Lozano	75	4-5	LP3
Rep. Lozano	103	4-5	LP3
Rep. Murr	78	14-16	Withdrawn
Rep. Murr	100	11-14	Withdrawn
Rep. Murr	102	17-18	LP1
Rep. Murr	106	16-17	LP1
Rep. Murr	108	6-7	LP1
Rep. Murr	108	16-17	LP1
Rep. Murr	121	10-11	LP1
Rep. Murr	144	3-4	LP1
Sean Opperman	71	3-4	LP2
Sean Opperman	80	3-5	LP3

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Sean Opperman	80	10-13	Withdrawn
Sean Opperman	80	19-20	Withdrawn
Sean Opperman	107	2-3	LP2
Sean Opperman	107	23-24	Withdrawn
Sean Opperman	111	8-9	Withdrawn
Sean Opperman	132	22-24	Withdrawn
Sean Opperman	155	12-17	Withdrawn
Sean Opperman	213	11-16	Withdrawn
Adam Foltz	104	104:25-105:1	LP2
Adam Foltz	108	1-6	LP2
Adam Foltz	111	10-11	LP2
Adam Foltz	112	13-17	LP2
Adam Foltz	117	19-22	LP2
Adam Foltz	118	16-17	LP2
Adam Foltz	121	15-18	LP2
Adam Foltz	140	9-11	LP2
Adam Foltz	141	14-18	LP2
Adam Foltz	142	15-16	LP2
Adam Foltz	145	21-24	LP2
Adam Foltz	148	11-14	LP2
Adam Foltz	151	12-15	LP2
Adam Foltz	155	17-23	LP2
Adam Foltz	173	21-22	LP2
Adam Foltz	174	9-10	LP2
Adam Foltz	191	6-7	LP2
Adam Foltz	195	19-20	LP2
Adam Foltz	200	12-14	LP2
Adam Foltz	200	22-23	LP2
Adam Foltz	206	21-22	LP2
Adam Foltz	221	17-18	LP2
Adam Foltz	223	11-14	LP2
Adam Foltz	235	21-22	LP2
Adam Foltz	238	18-19	LP2
Adam Foltz	244	4-5	LP2
Adam Foltz	244	11-12	LP2
Adam Foltz	257	4-8	LP2
Adam Foltz	257	12-15	LP2
Adam Foltz	285	285:24-286:1	LP2
Adam Foltz	286	286:25-287:1	LP2
Anna Mackin	30	22-23	LP2
Anna Mackin	32	10-11	LP2
Anna Mackin	34	11-12	LP2
Anna Mackin	34	17-18	Withdrawn
Anna Mackin	34	23-24	Withdrawn
Anna Mackin	35	5-6	Withdrawn
Anna Mackin	35	10-12	Withdrawn
Anna Mackin	35	16-17	LP2
Anna Mackin	36	1-2	Withdrawn
Anna Mackin	36	6-7	Withdrawn
Anna Mackin	36	12-23	LP2
Anna Mackin	40	16-18	LP2
Anna Mackin	41	16-17	LP2
Anna Mackin	41	41:21-42:1	LP2
Anna Mackin	43	12-13	Withdrawn
Anna Mackin	45	21-22	LP2
Anna Mackin	47	19-20	LP2
Anna Mackin	48	4-7	LP2
Anna Mackin	48	48:24-49:4	LP4
Anna Mackin	49	11-13	Withdrawn
Anna Mackin	50	10-13	LP2
Anna Mackin	56	12-13	LP2
Anna Mackin	56	18-19	LP2
Anna Mackin	57	9-12	LP2
Anna Mackin	58	2-15	LP2
Anna Mackin	59	22-25	LP2
Anna Mackin	60	11-12	LP2
Anna Mackin	61	8	LP2
Anna Mackin	61	10-11	LP2
Anna Mackin	61	16-17	LP2

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Anna Mackin	61	23-24	LP2
Anna Mackin	112	11-12	Withdrawn
Anna Mackin	112	17-18	Withdrawn
Anna Mackin	113	3-4	Withdrawn
Anna Mackin	113	9-10	Withdrawn
Anna Mackin	113	14-15	Withdrawn
Anna Mackin	149	5-8	LP2
Anna Mackin	151	23	LP2
Anna Mackin	151	13-17	LP2
Anna Mackin	162	17-21	LP2
Anna Mackin	164	164:22-165:4	LP2
Anna Mackin	171	13-18	LP2
Anna Mackin	176	1	LP2
Anna Mackin	185	5-6	LP2
Anna Mackin	196	5-6	LP2
Anna Mackin	196	196:25-197:1	LP2
Anna Mackin	198	12-13	LP2
Anna Mackin	200	11-12	LP2
Anna Mackin	200	17-19	LP2
Anna Mackin	210	3-4	LP2
Anna Mackin	210	21-22	LP2
Anna Mackin	211	7-8	LP2
Anna Mackin	213	6-7	LP2
Anna Mackin	213	12-13	LP2
Anna Mackin	214	2-3	LP2
Anna Mackin	215	11	LP2
Anna Mackin	221	21-24	LP2
Anna Mackin	225	1-2	LP2
Anna Mackin	226	4-7	LP2
Anna Mackin	226	13-14	LP2
Anna Mackin	227	16-18	LP2
Anna Mackin	227	24-25	LP2
Anna Mackin	228	5-6	LP2
Anna Mackin	238	1-2	LP2
Anna Mackin	239	11	LP2
Anna Mackin	241	8-14	LP2
Anna Mackin	244	16-17	LP2
Anna Mackin	248	5-6	LP2
Colleen Garcia	72	21-22	LP2
Colleen Garcia	223	15-16	LP2
Mark Bell	50	12-13	LP2
Mark Bell	53	2-4	LP2
Mark Bell	81	8	LP2
Mark Bell	131	12-13	LP2
Rep. Guillen	148	22	LP1
Rep. Guillen	148	14-16	LP1
Rep. Guillen	162	24-25	LP1
Rep. Guillen	163	5	LP1
Rep. Guillen	168	12	LP1
Rep. Huberty	43	8-9	LP1
Rep. Hunter	30	9-10	LP1
Rep. Hunter	30	14-15	LP1
Rep. Hunter	59	15-16	LP1
Rep. Hunter	60	13	LP1
Rep. Hunter	60	3-4	LP1
Rep. Hunter	69	14-22	LP1
Rep. Hunter	70	20-24	LP1
Rep. Hunter	71	6-7	LP1
Rep. Hunter	75	9-13	LP1
Rep. Hunter	76	19-24	LP1
Rep. Hunter	102	13-16	LP1
Rep. Hunter	102	22-23	LP1
Rep. Hunter	116	2-3	LP1
Rep. Hunter	128	14-15	LP1
Rep. Hunter	129	9-13	LP1
Rep. Hunter	152	5-6	LP1
Rep. Hunter	159	3-5	Withdrawn
Rep. Hunter	162	14-15	Withdrawn
Rep. Hunter	162	21-23	Withdrawn

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Rep. Hunter	259	10-14	LP1
Rep. Hunter	271	9-10	LP1
Rep. Jetton	47	18-19	LP1
Rep. Jetton	50	14-15	LP1
Rep. Jetton	50	19-20	LP1
Rep. Jetton	74	13-14	LP1
Rep. Jetton	76	3-5	LP1
Rep. Jetton	88	17-18	LP1
Rep. Jetton	113	113:25-114:3	LP1
Rep. Jetton	114	9-10	LP1
Rep. Jetton	114	18-19	LP1
Rep. Jetton	114	24-25	LP1
Rep. Jetton	116	18-21	LP1
Rep. Jetton	117	1-2	LP1
Rep. Jetton	146	14	LP1
Rep. Jetton	154	22-24	LP1
Rep. Jetton	162	18-19	LP1
Rep. Jetton	165	12-13	LP1
Rep. Jetton	170	19	LP1
Rep. Jetton	175	12-13	LP1
Rep. Jetton	177	21-22	LP1
Rep. Jetton	196	11-13	LP1
Rep. Jetton	197	16-20	LP1
Rep. Jetton	220	9-11	LP1
Rep. Jetton	225	12-13	LP1
Rep. Jetton	225	17-20	LP1
Rep. Jetton	226	21-22	LP1
Rep. Jetton	227	2-4	LP1
Rep. Jetton	227	8-10	LP1
Rep. Jetton	233	3-4	LP1
Rep. Landgraf	113	22-23	LP1
Rep. Landgraf	191	17-18	LP1
Rep. Landgraf	191	24-25	LP1
Rep. Landgraf	196	7-11	LP1
Rep. Landgraf	283	16-17	LP1
Rep. Landgraf	293	293:20-294:2	LP1
Rep. Murr	86	11-12	LP1
Rep. Murr	104	13-14	LP1
Rep. Murr	104	24-25	Grant, improper objection.
Rep. Murr	107	24-25	LP1
Rep. Murr	109	19-20	LP1
Rep. Murr	118	11-12	LP1
Rep. Murr	122	10-11	LP1
Rep. Murr	146	15-16	Withdrawn
Rep. Murr	149	7-8	LP1
Rep. Murr	160	17-18	LP1
Sean Opperman	45	12-13	LP2
Sean Opperman	49	2	Withdrawn
Sean Opperman	49	7	Withdrawn
Sean Opperman	67	14-15	LP2
Sean Opperman	67	24-25	LP2
Sean Opperman	80	10-13	Withdrawn
Sean Opperman	85	1-2	LP2
Sean Opperman	85	8-9	LP2
Sean Opperman	95	7-8	LP2
Sean Opperman	102	4-5	LP2
Sean Opperman	103	103:23-104:1	Withdrawn
Sean Opperman	107	23-24	Withdrawn
Sean Opperman	109	9	Withdrawn
Sean Opperman	109	4-5	Withdrawn
Sean Opperman	111	16-18	Withdrawn
Sean Opperman	123	10-11	LP2
Sean Opperman	132	15-16	LP2
Sean Opperman	132	22-24	Withdrawn
Sean Opperman	140	1-2	LP2

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Sean Opperman	192	12-13	LP2
Sean Opperman	193	10-11	LP2
Sean Opperman	199	199:25-200:3	LP2
Sean Opperman	200	6	LP2
Sean Opperman	247	25	LP2
Sean Opperman	247	12-13	LP2
Sean Opperman	247	18-20	LP2
Sean Opperman	248	5	LP2
Sean Opperman	249	5-6	LP2
Sean Opperman	251	4-9	LP2
Sean Opperman	251	251:19-252:2	LP2
Sean Opperman	252	9-10	LP2
Sean Opperman	252	15-21	LP2
Sean Opperman	255	255:23-256:3	LP2
Sean Opperman	257	3-13	LP2
Sean Opperman	259	1-2	LP2
Sean Opperman	261	18-19	LP2
Sean Opperman	273	24-25	LP2
Sean Opperman	274	5	LP2
Sean Opperman	275	9-10	LP2
Sean Opperman	282	8-9	LP2
Sean Opperman	296	8-9	LP2
Sean Opperman	297	1-2	LP2
Sean Opperman	297	7-8	LP2
Sean Opperman	309	16-17	LP2
Sean Opperman	316	23-24	LP2
Adam Foltz	92	13	LP2
Adam Foltz	92	7-9	LP2
Adam Foltz	92	24-25	LP2
Adam Foltz	93	14-15	LP2
Adam Foltz	94	19-20	LP2
Adam Foltz	94	94:25-95:1	LP2
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Adam Foltz	98	1-4	LP2
Adam Foltz	98	18-19	LP2
Adam Foltz	100	2-3	LP2
Adam Foltz	100	11-13	LP2
Adam Foltz	100	19-20	LP2
Adam Foltz	101	1-2	LP2
Adam Foltz	101	11-12	LP2
Adam Foltz	101	18-22	LP2
Adam Foltz	110	8-9	LP2
Adam Foltz	110	20-21	LP2
Adam Foltz	119	11-12	LP2
Adam Foltz	119	17-18	LP2
Adam Foltz	125	5-6	LP2
Adam Foltz	126	4-5	LP2
Adam Foltz	126	19-20	LP2
Adam Foltz	127	13-14	LP2
Adam Foltz	129	20-21	LP2
Adam Foltz	130	3-4	LP2
Adam Foltz	131	15-17	LP2
Adam Foltz	132	8-11	LP2
Adam Foltz	134	11-12	LP2
Adam Foltz	135	135:25-136:1	LP2
Adam Foltz	138	12-13	LP2
Adam Foltz	139	3-6	LP2
Adam Foltz	143	2-3	LP2
Adam Foltz	143	13-14	LP2
Adam Foltz	143	20-21	LP2
Adam Foltz	144	22-25	LP2
Adam Foltz	145	11-13	LP2
Adam Foltz	148	11-14	LP2
Adam Foltz	148	23-24	LP2
Adam Foltz	170	22-23	LP2
Adam Foltz	173	15-16	LP2
Adam Foltz	186	9-10	LP2

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Adam Foltz	189	3-4	LP2
Adam Foltz	190	15-16	LP2
Adam Foltz	191	13-14	LP2
Adam Foltz	191	19-20	LP2
Adam Foltz	194	5-6	LP2
Adam Foltz	194	10-11	LP2
Adam Foltz	194	15-16	LP2
Adam Foltz	194	24-25	LP2
Adam Foltz	195	13-14	LP2
Adam Foltz	196	23	LP2
Adam Foltz	196	4-6	LP2
Adam Foltz	199	11-14	LP2
Adam Foltz	200	3-6	LP2
Adam Foltz	200	12-14	LP2
Adam Foltz	200	22-23	LP2
Adam Foltz	202	2-3	LP2
Adam Foltz	202	13-14	LP2
Adam Foltz	204	12-13	LP2
Adam Foltz	204	19-20	LP2
Adam Foltz	205	2-5	LP2
Adam Foltz	205	10-11	LP2
Adam Foltz	205	23-24	LP2
Adam Foltz	206	10-11	LP2
Adam Foltz	207	5-6	LP2
Adam Foltz	207	24-25	LP2
Adam Foltz	208	13-14	LP2
Adam Foltz	208	21-22	LP2
Adam Foltz	209	18-20	LP2
Adam Foltz	212	21-22	LP2
Adam Foltz	213	2-3	LP2
Adam Foltz	213	21-22	LP2
Adam Foltz	226	9-10	LP2
Adam Foltz	231	1-2	LP2
Adam Foltz	231	12-13	LP2
Adam Foltz	231	24-25	LP2
Adam Foltz	249	249:25-250:1	LP2
Adam Foltz	257	21-25	LP2
Adam Foltz	261	9-10	LP2
Adam Foltz	261	15-16	LP2
Adam Foltz	270	22-23	LP2
Adam Foltz	271	5-6	LP2
Adam Foltz	271	10-11	LP2
Colleen Garcia	66	11-12	LP2
Colleen Garcia	68	20-23	LP2
Colleen Garcia	71	24-1	LP2
Colleen Garcia	164	10	LP2
Colleen Garcia	167	4-5	LP2
Colleen Garcia	172	20-21	LP2
Colleen Garcia	180	12-13	LP2
Colleen Garcia	182	19-20	LP2
Colleen Garcia	183	8-9	LP2
Colleen Garcia	183	21-23	LP2
Colleen Garcia	188	21	LP2
Colleen Garcia	188	1-3	LP2
Colleen Garcia	188	10-11	LP2
Colleen Garcia	188	16-17	LP2
Colleen Garcia	189	5-7	LP2
Colleen Garcia	190	9-10	LP2
Colleen Garcia	191	25	LP2
Colleen Garcia	195	12-13	LP2
Colleen Garcia	200	13	LP2
Colleen Garcia	204	10-11	LP2
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Rep. Guillen	148	22	LP1
Rep. Guillen	148	14-16	LP1
Rep. Guillen	149	12	LP1
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Rep. Guillen	150	18	LP1
Rep. Guillen	150	5-6	LP1
Rep. Guillen	151	1-2	LP1
Rep. Guillen	151	16-20	LP1
Rep. Guillen	152	1	LP1
Rep. Guillen	153	15-16	LP1
Rep. Guillen	153	22-23	LP1
Rep. Guillen	154	3	LP1
Rep. Guillen	170	4-6	LP1
Rep. Guillen	170	21-22	LP1
Rep. Hunter	64	21-22	LP1
Rep. Hunter	66	2-6	LP1
Rep. Hunter	73	9-11	LP3
Rep. Hunter	73	18-19	LP3
Rep. Hunter	74	21-22	LP3
Rep. Hunter	75	1-2	LP3
Rep. Hunter	75	19-20	LP3
Rep. Hunter	114	9-10	LP1
Rep. Hunter	114	17-18	LP1
Rep. Hunter	117	18-21	LP1
Rep. Hunter	118	12-13	LP1
Rep. Hunter	152	18	LP1
Rep. Hunter	153	15	Grant, improper objection.
Rep. Hunter	195	11	LP1
Rep. Hunter	195	6-7	LP1
Rep. Hunter	238	11-12	LP1
Rep. Hunter	238	18-19	LP1
Rep. Hunter	249	22-23	LP1
Rep. Hunter	250	5-8	LP1
Rep. Hunter	251	17-20	LP1
Rep. Hunter	257	22	LP1
Rep. Hunter	259	24	LP1
Rep. Hunter	259	10-14	LP1
Rep. Hunter	266	3-6	LP1
Rep. Hunter	269	19-21	LP1
Rep. Hunter	270	20-25	LP1
Rep. Hunter	271	17-21	LP1
Rep. Hunter	288	4-7	LP1
Rep. Hunter	290	17	LP1
Rep. Hunter	291	291:23-292:3	LP1
Rep. Hunter	292	6	LP1
Rep. Hunter	294	23-25	LP1
Rep. Hunter	295	19-24	LP1
Rep. Hunter	304	7-8	Grant, improper objection.
Rep. Jetton	44	44:25-45:1	LP1
Rep. Jetton	45	8-9	LP1
Rep. Jetton	48	21-22	LP1
Rep. Jetton	49	2-3	LP1
Rep. Jetton	49	7-8	LP1
Rep. Jetton	49	13-14	LP1
Rep. Jetton	50	1-2	LP1
Rep. Jetton	50	9-10	LP1
Rep. Jetton	51	13-15	LP1
Rep. Jetton	51	20-21	LP1
Rep. Jetton	53	13-14	LP1
Rep. Jetton	63	1-5	LP1
Rep. Jetton	74	4-5	LP1
Rep. Jetton	84	7-11	LP1
Rep. Jetton	84	15-16	LP1
Rep. Jetton	86	2-5	LP1
Rep. Jetton	86	8-9	LP1
Rep. Jetton	86	15-16	LP1
Rep. Jetton	86	21-22	LP1
Rep. Jetton	86	86:25-87:1	LP1
Rep. Jetton	87	7-8	LP1
Rep. Jetton	91	91:23-92:2	LP1
Rep. Jetton	92	22-25	LP1

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Rep. Jetton	93	20-21	LP1
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Rep. Jetton	95	3-5	LP1
Rep. Jetton	139	3-4	LP1
Rep. Jetton	170	19	LP1
Rep. Jetton	211	6-9	LP1
Rep. Jetton	215	22-25	LP1
Rep. Jetton	216	5	LP1
Rep. Jetton	216	11-12	LP1
Rep. Jetton	216	22-23	LP1
Rep. Jetton	227	8-10	LP1
Rep. Jetton	233	3-4	LP1
Rep. Landgraf	44	23-25	LP1
Rep. Landgraf	46	19-20	LP1
Rep. Landgraf	49	14-16	LP1
Rep. Landgraf	104	22-24	LP1
Rep. Landgraf	108	21-22	LP1
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Rep. Landgraf	115	18-19	LP1
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Rep. Landgraf	118	11-12	LP1
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Rep. Landgraf	120	18-19	LP1
Rep. Landgraf	123	21-22	LP1
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Rep. Landgraf	129	21-22	LP1
Rep. Landgraf	130	24-25	LP1
Rep. Landgraf	131	11-12	LP1
Rep. Landgraf	131	17-18	LP1
Rep. Landgraf	132	5-6	LP1
Rep. Landgraf	132	12-13	LP1
Rep. Landgraf	135	7-8	LP3
Rep. Landgraf	135	12-13	LP3
Rep. Landgraf	135	17-18	LP3
Rep. Landgraf	135	22-23	LP3
Rep. Landgraf	136	11-12	LP1
Rep. Landgraf	136	21-22	LP1
Rep. Landgraf	137	6-7	LP1
Rep. Landgraf	137	16-17	LP1
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Rep. Landgraf	191	17-18	LP1
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Rep. Landgraf	193	16-17	LP1
Rep. Landgraf	194	5-6	LP1
Rep. Landgraf	195	3-4	LP1
Rep. Landgraf	235	11-12	LP1
Rep. Landgraf	246	246:25-247:2	LP1
Rep. Landgraf	261	23-24	LP1
Rep. Landgraf	264	13-14	LP1

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Rep. Landgraf	266	6-19	LP1
Rep. Landgraf	267	11-12	LP1
Rep. Landgraf	287	287:24-288:2	LP1
Rep. Landgraf	288	20-21	LP1
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Rep. Murr	99	19-20	LP1
Rep. Murr	105	5-6	LP1
Rep. Murr	105	16-17	LP1
Rep. Murr	107	1-2	LP1
Rep. Murr	117	4-5	LP1
Rep. Murr	117	13-14	LP1
Rep. Murr	120	4-5	LP1
Rep. Murr	120	12-13	LP1
Rep. Murr	120	18-19	LP1
Rep. Murr	122	5-6	LP1
Rep. Murr	124	7-8	LP1
Rep. Murr	133	21-22	LP1
Rep. Murr	137	2-3	LP1
Rep. Murr	143	5-6	LP1
Rep. Hunter	112	4-8	Withdrawn
Rep. Hunter	112	15-16	Withdrawn
Rep. Hunter	142	5-9	LP1
Rep. Hunter	162	14-15	Withdrawn
Rep. Hunter	164	164:22-165:1	LP3
Rep. Hunter	165	20-21	Grant, improper objection.
Rep. Hunter	294	23-25	LP1
Rep. Hunter	295	19-24	LP1
Rep. Hunter	303	12-13	LP3
Rep. Jetton	69	69:24-70:1	LP1
Rep. Jetton	70	7-8	LP1
Rep. Jetton	70	20-22	LP1
Rep. Jetton	71	3-4	LP1
Rep. Jetton	72	1-2	LP1
Rep. Jetton	145	1-4	LP1
Rep. Jetton	175	4-5	LP3
Rep. Jetton	188	12-15	LP1
Rep. Jetton	189	6-7	LP3
Rep. Jetton	203	12-14	LP3
Rep. Landgraf	44	23-25	LP1
Rep. Landgraf	46	19-20	LP1
Rep. Landgraf	49	14-16	LP3
Rep. Landgraf	104	22-24	LP1
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Rep. Landgraf	184	2-3	LP1
Rep. Landgraf	204	19-20	LP1
Rep. Landgraf	235	11-12	LP3
Rep. Lozano	26	26:25-27:1	Withdrawn
Rep. Lozano	62	19-21	LP3
Rep. Lozano	63	20-21	LP3
Rep. Lozano	64	1-2	LP1
Rep. Lozano	65	4-6	LP1
Rep. Lozano	66	7-9	LP1
Rep. Lozano	75	4-5	LP3

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Rep. Lozano	103	4-5	LP3
Rep. Lozano	104	8-9	LP3
Rep. Lozano	104	20-21	LP1
Sean Opperman	43	18	LP2
Sean Opperman	43	12-13	LP2
Sean Opperman	44	20-21	LP2
Sean Opperman	45	12-13	LP2
Sean Opperman	48	18-19	LP2
Sean Opperman	49	2	Withdrawn
Sean Opperman	49	7	Withdrawn
Sean Opperman	49	10	LP2
Adam Foltz	34	21-22	LP2
Adam Foltz	107	17-21	LP2
Adam Foltz	108	13-14	LP2
Adam Foltz	111	2-5	LP2
Adam Foltz	125	5-6	LP2
Adam Foltz	126	4-5	LP2
Adam Foltz	130	9-10	LP2
Adam Foltz	134	17-18	LP2
Adam Foltz	135	15-18	LP2
Adam Foltz	139	22-23	LP2
Adam Foltz	140	2-3	LP2
Adam Foltz	140	9-11	LP2
Adam Foltz	143	143:25-144:1	LP2
Adam Foltz	144	6-7	LP2
Adam Foltz	149	5-6	LP2
Adam Foltz	177	19-20	LP2
Adam Foltz	178	9-10	LP2
Adam Foltz	186	3-4	LP2
Adam Foltz	187	1-2	LP2
Adam Foltz	196	4-6	LP2
Adam Foltz	197	8-9	LP2
Adam Foltz	197	18-22	LP2
Adam Foltz	219	21-22	LP2
Adam Foltz	221	5-8	LP2
Adam Foltz	233	6	LP2
Adam Foltz	233	1-2	LP2
Adam Foltz	233	15-16	LP2
Adam Foltz	233	20-21	LP2
Adam Foltz	236	9	LP2
Adam Foltz	236	14	LP2
Adam Foltz	236	3-4	LP2
Adam Foltz	267	6-7	LP2
Adam Foltz	267	11-12	LP2
Adam Foltz	267	16-17	LP2
Adam Foltz	268	10-11	LP2
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Anna Mackin	35	21-22	LP2
Anna Mackin	36	1-2	LP2
Anna Mackin	36	6-7	LP2
Anna Mackin	36	12-23	LP2
Anna Mackin	38	4-5	LP2
Anna Mackin	49	18-19	LP2
Anna Mackin	49	22-23	LP2
Anna Mackin	50	4-5	LP2
Anna Mackin	112	11-12	LP2
Anna Mackin	112	17-18	LP2
Anna Mackin	113	3-4	LP2
Anna Mackin	113	9-10	LP2
Anna Mackin	113	14-15	LP2
Anna Mackin	113	21-22	LP2
Anna Mackin	114	9	LP2
Anna Mackin	114	14	LP2
Anna Mackin	114	17	LP2
Anna Mackin	114	5-6	LP2
Anna Mackin	114	20-21	LP2
Anna Mackin	115	11-12	LP2

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Anna Mackin	116	14-15	LP2
Anna Mackin	146	21-22	LP2
Anna Mackin	147	23	LP2
Anna Mackin	147	1-2	LP2
Anna Mackin	147	12-13	LP2
Anna Mackin	147	18-19	LP2
Anna Mackin	148	3	LP2
Anna Mackin	148	10-11	LP2
Anna Mackin	148	20-21	LP2
Anna Mackin	149	13	LP2
Anna Mackin	149	5-8	LP2
Anna Mackin	170	16-18	LP2
Anna Mackin	197	14-16	LP2
Anna Mackin	198	12-13	LP2
Anna Mackin	198	17-18	LP2
Anna Mackin	202	202:25-203:1	LP2
Anna Mackin	241	8-14	LP2
Chris Gober	135	8-9	LP2
Chris Gober	241	17-18	LP2
Chris Gober	241	24-25	LP2
Chris Gober	242	4	LP2
Chris Gober	242	6	LP2
Chris Gober	262	6-7	LP2
Colleen Garcia	47	15	LP2
Colleen Garcia	47	47:25-48:1	LP2
Colleen Garcia	48	48:24-49:1	LP2
Colleen Garcia	54	12-18	LP2
Colleen Garcia	55	10-16	Grant, improper objection.
Colleen Garcia	69	23-25	LP2
Colleen Garcia	70	4	LP2
Colleen Garcia	70	7	LP2
Colleen Garcia	76	8-12	LP2
Colleen Garcia	76	76:22-77:10	LP2
Colleen Garcia	77	21-22	LP3
Colleen Garcia	78	9	LP2
Colleen Garcia	78	4-5	LP2
Colleen Garcia	86	24-25	LP2
Colleen Garcia	109	5	LP2
Colleen Garcia	109	20	LP2
Colleen Garcia	109	24	LP2
Colleen Garcia	109	14-15	LP2
Colleen Garcia	110	7-9	LP2
Colleen Garcia	112	13-14	LP2
Colleen Garcia	112	18-19	LP2
Colleen Garcia	121	22-23	LP2
Colleen Garcia	122	14-15	LP2
Colleen Garcia	123	10-11	LP2
Colleen Garcia	123	19-20	LP2
Colleen Garcia	136	10-11	LP4
Colleen Garcia	163	18-19	LP2
Colleen Garcia	167	4-5	LP2
Colleen Garcia	171	25	LP2
Colleen Garcia	171	9-10	LP4
Colleen Garcia	171	16-17	LP2
Colleen Garcia	190	15	LP4
Colleen Garcia	195	6	LP2
Colleen Garcia	195	1-2	LP2
Colleen Garcia	214	7-8	LP2
Colleen Garcia	215	20-21	LP2
Colleen Garcia	221	221:25-222:1	LP2
Mark Bell	13	13:20-14:1	Withdrawn
Mark Bell	14	5	Withdrawn
Mark Bell	34	19-20	LP2
Mark Bell	36	5-6	LP2
Mark Bell	36	14-15	LP2
Mark Bell	50	20-22	LP2
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Rep. Buckley	61	2-8	LP1
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Rep. Buckley	76	19-25	LP1
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Rep. Guillen	154	16-17	LP1
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Rep. Guillen	156	5-6	LP1
Rep. Guillen	160	2-3	LP1
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Rep. Guillen	165	14-15	LP1
Rep. Guillen	166	4	LP1
Rep. Guillen	166	11	LP1
Rep. Guillen	169	17-18	LP1
Rep. Guillen	169	22-23	LP1
Rep. Guillen	170	4-6	LP1
Rep. Guillen	170	14-15	LP1
Rep. Guillen	181	22-23	LP1
Rep. Guillen	186	14-15	LP1
Rep. Guillen	187	1-2	LP1
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Rep. Guillen	189	7-8	LP1
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Rep. Guillen	198	7-8	LP1
Rep. Guillen	198	21-22	LP1
Rep. Guillen	199	199:18-200:10	LP4
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Rep. Hunter	21	18-19	LP1
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Rep. Hunter	193	10-11	LP1
Rep. Hunter	193	16-17	LP1
Rep. Hunter	254	23-24	LP1
Rep. Hunter	266	266:25-267:1	LP1
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Rep. Hunter	290	24-25	LP1
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Rep. Hunter	308	23-24	LP1
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Rep. Jetton	55	4-5	LP1
Rep. Jetton	55	14-15	Grant, improper objection.
Rep. Jetton	55	19-20	LP1
Rep. Jetton	58	8	Grant, improper objection.
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Rep. Jetton	62	7-8	LP1
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Rep. Jetton	213	12-14	LP1
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Rep. Jetton	222	17-18	LP1
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Rep. Jetton	224	3	LP1
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Rep. Landgraf	178	11-12	LP1
Rep. Landgraf	178	22-23	LP1
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Rep. Landgraf	192	17-18	LP1
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Rep. Landgraf	280	13-14	LP1
Rep. Landgraf	281	4-5	LP1
Rep. Landgraf	284	13-16	LP1
Rep. Lozano	49	12-13	LP1
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Rep. Lozano	51	16-18	LP1
Rep. Lozano	52	5	LP1
Rep. Lozano	53	19-20	LP1
Rep. Lozano	59	17	LP1
Rep. Lozano	83	8-9	LP1
Rep. Lozano	91	21-22	LP1
Rep. Lozano	107	15-16	LP1
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Rep. Lozano	112	14-15	LP1
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Rep. Murr	84	11-12	LP1
Rep. Murr	85	11-12	LP1
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Rep. Murr	119	20-21	LP1
Rep. Murr	119	24-25	LP1
Rep. Murr	121	24-25	LP1
Rep. Murr	122	5-6	LP1
Rep. Murr	122	23-24	LP1
Rep. Murr	123	4-5	LP1
Rep. Murr	123	15-16	LP1
Rep. Murr	123	19-20	LP1
Rep. Murr	124	2-3	LP1
Rep. Murr	143	12-13	LP1
Rep. Murr	143	22-23	LP1
Rep. Murr	144	3-4	LP1
Rep. Murr	144	19-20	LP1
Rep. Murr	148	7-8	LP1
Rep. Murr	149	16-17	LP1
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Sean Opperman	84	11-12	LP2
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Sean Opperman	138	2-3	LP2
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Sean Opperman	138	138:25-139:1	LP2
Sean Opperman	138	16-17	LP2
Sean Opperman	140	22-23	LP2
Sean Opperman	141	4-5	LP2
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Sean Opperman	176	12-13	LP2
Sean Opperman	176	176:21-177:1	Withdrawn
Sean Opperman	177	5	Withdrawn
Sean Opperman	177	12-17	LP2
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67	DOC_0357062	Senator Brian Birdwell	PDF		5/18/2022	Brian Birdwell	Anna Barnett			Legislative	Confidential communication from Anna Barnett (Sen. Birdwell chief of staff) to Senator Birdwell regarding upcoming senate redistricting committee hearings.	LP2
78	DOC_0357214	Senator Charles Perry	MSG		10/25/2021	Charles Perry	Matthew Dowling			Legislative	Confidential communication between Senator Perry and his staff regarding draft statements relating to legislative redistricting process.	LP2
79	DOC_0357338	Senator Charles Perry	MSG		10/25/2021	Matthew Dowling	Charles Perry			Legislative	Confidential communication between Senator Perry and his staff regarding draft statements relating to legislative redistricting process.	LP2
77	DOC_0357212	Senator Charles Perry	MSG		10/20/2021	Charles Perry; Rob Callan	Matthew Dowling			Legislative	Confidential communication between Senator Perry and his staff regarding draft statements relating to legislative redistricting process.	LP2
28	DOC_0362824	Representative Mike Schofield			10/14/2021					Legislative	Confidential draft electoral map, used in furtherance of considering redistricting legislation.	LP2
29	DOC_0362825	Representative Mike Schofield			10/14/2021					Legislative	Confidential draft electoral map, used in furtherance of considering redistricting legislation.	LP2
30	DOC_0362826	Representative Mike Schofield			10/14/2021					Legislative	Confidential draft electoral map, used in furtherance of considering redistricting legislation.	LP2
31	DOC_0362827	Representative Mike Schofield			10/14/2021					Legislative	Confidential draft electoral map, used in furtherance of considering redistricting legislation.	LP2
32	DOC_0362828	Representative Mike Schofield			10/14/2021					Legislative	Confidential draft electoral map, used in furtherance of considering redistricting legislation.	LP2
33	DOC_0362829	Representative Mike Schofield			10/14/2021					Legislative	Confidential draft electoral map, used in furtherance of considering redistricting legislation.	LP2
34	DOC_0362830	Representative Mike Schofield			10/14/2021					Legislative	Confidential draft electoral map, used in furtherance of considering redistricting legislation.	LP2
35	DOC_0362831	Representative Mike Schofield			10/14/2021					Legislative	Confidential draft electoral map, used in furtherance of considering redistricting legislation.	LP2
36	DOC_0362832	Representative Mike Schofield			10/14/2021					Legislative	Confidential draft electoral map, used in furtherance of considering redistricting legislation.	LP2

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37	DOC_0362833	Representative Mike Schofield			10/14/2021					Legislative	Confidential draft electoral map, used in furtherance of considering redistricting legislation.	LP2
48	PDOC_006648	Representative Mike Schofield			10/12/2021					Legislative	Confidential summary of legislative proceedings, used in furtherance of considering redistricting legislation.	LP2
69	DOC_0362862	Senator Bryan Hughes			10/8/2021					Legislative	Confidential communication between Senator Hughes and his staff regarding draft redistricting legislation for congressional districts.	LP2
70	DOC_0362863	Senator Bryan Hughes			10/8/2021					Legislative	Confidential communication between Senator Hughes and his staff regarding draft redistricting legislation for congressional districts.	LP2
71	DOC_0362864	Senator Bryan Hughes			10/8/2021					Legislative	Confidential communication between Senator Hughes and his staff regarding draft redistricting legislation for congressional districts.	LP2
72	DOC_0362865	Senator Bryan Hughes			10/8/2021					Legislative	Confidential communication between Senator Hughes and his staff regarding draft redistricting legislation for congressional districts.	LP2
73	DOC_0362866	Senator Bryan Hughes			10/8/2021					Legislative	Confidential communication between Senator Hughes and his staff regarding draft redistricting legislation for congressional districts.	LP2
68	DOC_0362861	Senator Bryan Hughes			10/7/2021					Legislative	Confidential communication between Senator Hughes and his staff regarding draft redistricting legislation for congressional districts.	LP2
17	DOC_0362809	Representative Mike Schofield			10/6/2021					Legislative	Confidential comparison of draft electoral maps, used in furtherance of considering redistricting legislation.	LP2
18	DOC_0362810	Representative Mike Schofield			10/6/2021					Legislative	Confidential comparison of draft electoral maps, used in furtherance of considering redistricting legislation.	LP2
19	DOC_0362811	Representative Mike Schofield			10/6/2021					Legislative	Confidential comparison of draft electoral maps, used in furtherance of considering redistricting legislation.	LP2
20	DOC_0362812	Representative Mike Schofield			10/6/2021					Legislative	Confidential comparison of draft electoral maps, used in furtherance of considering redistricting legislation.	LP2
21	DOC 0362813	Representative Mike Schofield			10/6/2021					Legislative	Confidential comparison of draft electoral maps, used in furtherance of considering redistricting legislation.	LP2

Entry	Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
63	DOC_0357052	Senator Brian Birdwell	PDF		10/6/2021	Brian Birdwell	Anna Barnett			Legislative	Confidential communication from Anna Barnett (Sen. Birdwell chief of staff) to Senator Birdwell regarding draft statements relating to legislative redistricting process.	LP2
22	DOC_0362817	Representative Mike Schofield			10/5/2021					Legislative	Confidential draft electoral map, used in furtherance of considering redistricting legislation.	LP2
23	DOC_0362818	Representative Mike Schofield			10/5/2021					Legislative	Confidential draft electoral map, used in furtherance of considering redistricting legislation.	LP2
93	DOC_0356936	Senator Paul Bettencourt	PDF		10/1/2021					Legislative	Confidential draft electoral map, used in furtherance of considering redistricting legislation.	LP2
94	DOC_0356937	Senator Paul Bettencourt	PDF		10/1/2021					Legislative	Confidential draft electoral map, used in furtherance of considering redistricting legislation.	LP2
110	DOC_0356959	Senator Paul Bettencourt	JPG		10/1/2021	Brandon Creighton	Paul Bettencourt			Legislative	Confidential communication regarding draft redistricting legislation.	LP1
25	DOC_0362821	Representative Mike Schofield			9/30/2021					Legislative	Confidential draft electoral map, used in furtherance of considering redistricting legislation.	LP2
26	DOC_0362822	Representative Mike Schofield			9/30/2021					Legislative	Confidential draft electoral map, used in furtherance of considering redistricting legislation.	LP2
27	DOC_0362823	Representative Mike Schofield			9/30/2021					Legislative	Confidential draft electoral map, used in furtherance of considering redistricting legislation.	LP2
122	DOC_0356976	Senator Paul Bettencourt	PDF		9/30/2021					Legislative	Confidential draft electoral maps, used in furtherance of considering redistricting legislation.	LP2
123	DOC_0356977	Senator Paul Bettencourt	PDF		9/30/2021					Legislative	Confidential draft electoral maps, used in furtherance of considering redistricting legislation.	LP2
124	DOC_0356978	Senator Paul Bettencourt	PDF		9/30/2021					Legislative	Confidential draft electoral maps, used in furtherance of considering redistricting legislation.	LP2
125	DOC_0356979	Senator Paul Bettencourt	PDF		9/30/2021					Legislative	Confidential draft electoral maps, used in furtherance of considering redistricting legislation.	LP2
107	DOC_0356956	Senator Paul Bettencourt	JPG		9/28/2021	Brandon Creighton	Paul Bettencourt			Legislative	Confidential communication regarding draft redistricting legislation.	LP1
108	DOC_0356957	Senator Paul Bettencourt	JPG		9/28/2021	Brandon Creighton	Paul Bettencourt			Legislative	Confidential communication regarding draft redistricting legislation.	LP1
109	DOC_0356958	Senator Paul Bettencourt	JPG		9/28/2021	Brandon Creighton	Paul Bettencourt			Legislative	Confidential communication regarding draft redistricting legislation.	LP1

Entry	Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
4	DOC_0362785	Representative Mike Schofield		Mike Schofield	9/27/2021					Legislative	Confidential internal notes on draft redistricting legislation, used in furtherance of considering redistricting legislation.	LP1
105	DOC_0356954	Senator Paul Bettencourt	JPG		9/27/2021	Brandon Creighton	Paul Bettencourt			Legislative	Confidential communication regarding draft redistricting legislation.	LP1
106	DOC_0356955	Senator Paul Bettencourt	JPG		9/27/2021	Brandon Creighton	Paul Bettencourt			Legislative	Confidential communication regarding draft redistricting legislation.	LP1
117	DOC_0356970	Senator Paul Bettencourt	DOCX	Sean Opperman	9/25/2021					Legislative	Typed notes from senate redistricting committee hearing.	LP2
116	DOC_0356968	Senator Paul Bettencourt	DOCX	Sean Opperman	9/24/2021					Legislative	Typed notes from senate redistricting committee hearing.	LP2
101	DOC_0356950	Senator Paul Bettencourt	JPG		9/23/2021	Lois Kolkhorst	Paul Bettencourt			Legislative	Confidential communication regarding draft redistricting legislation.	LP1
102	DOC_0356951	Senator Paul Bettencourt	JPG		9/23/2021	Cecil Bell	Paul Bettencourt			Legislative	Confidential communication regarding draft redistricting legislation.	LP1
7	DOC_0362788	Representative Mike Schofield			9/22/2021					Legislative	Confidential draft electoral map, used in furtherance of considering redistricting legislation.	LP2
8	DOC_0362789	Representative Mike Schofield			9/22/2021					Legislative	Confidential draft electoral map, used in furtherance of considering redistricting legislation.	LP2
9	DOC_0362790	Representative Mike Schofield			9/20/2021					Legislative	Confidential draft electoral map, used in furtherance of considering redistricting legislation.	LP2
10	DOC_0362791	Representative Mike Schofield			9/20/2021					Legislative	Confidential draft electoral map, used in furtherance of considering redistricting legislation.	LP2
11	DOC_0362792	Representative Mike Schofield			9/20/2021					Legislative	Confidential draft electoral map, used in furtherance of considering redistricting legislation.	LP2
15	DOC_0362806	Representative Mike Schofield			9/20/2021					Legislative	Confidential draft electoral map, used in furtherance of considering redistricting legislation.	LP2
84	PDOC_006501	Senator Jane Nelson			9/10/2021	Members of the Texas Senate	Joan Huffman			Legislative	Confidential communication from Senator Huffman to members of the Senate regarding expected release of Census data.	LP1
85	PDOC_006504	Senator Jane Nelson			9/10/2021	Members of the Texas Senate	Joan Huffman			legislative	Confidential communication from Senator Huffman to members of the Senate regarding expected release of Census data.	LP1
111	DOC_0356961	Senator Paul Bettencourt	XLSX	Bryan Dunaway	9/8/2021					Legislative	Confidential data used in furtherance of considering draft redistricting legislation.	LP2
112	DOC_0356962	Senator Paul Bettencourt	XLSX	Bryan Dunaway	9/8/2021					Legislative	Confidential data used in furtherance of considering draft redistricting legislation.	LP2
113	DOC_0356963	Senator Paul Bettencourt	XLSX	Bryan Dunaway	9/8/2021					Legislative	Confidential data used in furtherance of considering draft redistricting legislation.	LP2

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Entry	Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
157	PDOC_006058	Senator Robert Nichols			9/3/2021	Robert Nichols	Joan Huffman			Legislative	Confidential communication regarding upcoming Senate Redistricting Committee hearing, and request for input and assistance.	LP1
3	DOC_0362784	Representative Mike Schofield		Mike Schofield	7/14/2021					Legislative	Confidential internal notes on draft redistricting legislation, used in furtherance of considering redistricting legislation.	LP1
1	DOC_0362782	Representative Mike Schofield		Mike Schofield	6/16/2021					Legislative	Confidential internal notes on draft redistricting legislation, used in furtherance of considering redistricting legislation.	LP1
13	DOC_0362799	Representative Mike Schofield			6/16/2021					Legislative	Confidential draft electoral map, used in furtherance of considering redistricting legislation.	LP2
14	DOC_0362800	Representative Mike Schofield			6/16/2021					Legislative	Confidential draft electoral map, used in furtherance of considering redistricting legislation.	LP2
12	DOC_0362793	Representative Mike Schofield			6/10/2021					Legislative	Confidential draft electoral map, used in furtherance of considering redistricting legislation.	LP2
5	DOC_0362786	Representative Mike Schofield		Mike Schofield	6/1/2021					Legislative	Confidential data used in furtherance of considering draft redistricting legislation.	LP1
6	DOC_0362787	Representative Mike Schofield		Mike Schofield	6/1/2021					Legislative	Confidential data used in furtherance of considering draft redistricting legislation.	LP1
80	DOC_0357471	Senator Charles Perry	PDF	Matthew Dowling	1/21/2021					Legislative	Internal notes regarding senate redistricting committee hearing procedural protocols.	LP2
114	DOC_0356966	Senator Paul Bettencourt	PDF	U.S. Census Bureau	12/24/2020					Legislative	Confidential data used in furtherance of considering draft redistricting legislation.	LP2
92	DOC_0356933	Senator Paul Bettencourt	PDF	U.S. Census Bureau	12/22/2020					Legislative	Confidential draft electoral map, used in furtherance of considering redistricting legislation.	LP2
97	DOC_0356940	Senator Paul Bettencourt	PDF		12/12/2020					Legislative	Confidential draft electoral map, used in furtherance of considering redistricting legislation.	LP2
115	DOC_0356967	Senator Paul Bettencourt	PDF		12/12/2020					Legislative	Confidential data used in furtherance of considering draft redistricting legislation.	LP2
96	DOC_0356939	Senator Paul Bettencourt	PDF		12/11/2020					Legislative	Confidential draft electoral map, used in furtherance of considering redistricting legislation.	LP2
98	DOC_0356941	Senator Paul Bettencourt	PDF		12/11/2020					Legislative	Confidential draft electoral map, used in furtherance of considering redistricting legislation.	LP2
99	DOC_0356942	Senator Paul Bettencourt	PDF		12/11/2020					Legislative	Confidential draft electoral map, used in furtherance of considering redistricting legislation.	LP2

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Entry	Control Number	Custodian	File Extension	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
75	DOC_0357127	Senator Charles Perry	PDF		11/16/2020					Legislative	Invitation to confidential meeting with Senator Huffman to discuss draft redistricting legislation.	LP1
66	DOC_0357061	Senator Brian Birdwell	PDF		11/13/2020	Brian Birdwell	Anna Barnett			Legislative	Confidential draft electoral maps, used in furtherance of considering redistricting legislation.	LP2
100	DOC_0356947	Senator Paul Bettencourt	PDF	Nancy Watkins	10/28/2020					Legislative	Confidential draft electoral map, used in furtherance of considering redistricting legislation.	LP2
76	DOC_0357128	Senator Charles Perry	PDF		10/20/2020					Legislative	Calendar entry for confidential meeting relating to draft redistricting legislation.	LP1
159	PDOC_006065	Senator Robert Nichols			10/30/2019	Joan Huffman	Beverly Powell			Legislative	Confidential communication regarding draft redistricting legislation and redistricting considerations.	LP1
158	PDOC_006061	Senator Robert Nichols			8/2/2019	Robert Nichols	Joan Huffman			Legislative	Confidential communication regarding upcoming Senate Redistricting Committee hearing, and request for input and assistance.	LP1
95	DOC_0356938	Senator Paul Bettencourt	PDF		1/7/2013					Legislative	Confidential draft electoral map, used in furtherance of considering redistricting legislation.	LP2
39	PDOC_006573	Representative Mike Schofield								Legislative	Confidential draft electoral map, used in furtherance of considering redistricting legislation.	LP2
40	PDOC_006574	Representative Mike Schofield								Legislative	Confidential draft electoral map, used in furtherance of considering redistricting legislation.	LP2
41	PDOC_006575	Representative Mike Schofield								Legislative	Confidential draft electoral map, used in furtherance of considering redistricting legislation.	LP2
42	PDOC_006577	Representative Mike Schofield								Legislative	Confidential draft electoral map, used in furtherance of considering redistricting legislation.	LP2
43	PDOC_006578	Representative Mike Schofield								Legislative	Confidential draft electoral map, used in furtherance of considering redistricting legislation.	LP2
44	PDOC_006579	Representative Mike Schofield								Legislative	Confidential draft electoral map, used in furtherance of considering redistricting legislation.	LP2
45	PDOC_006580	Representative Mike Schofield								Legislative	Confidential draft electoral map, used in furtherance of considering redistricting legislation.	LP2
46	PDOC_006586	Representative Mike Schofield								Legislative	Confidential draft electoral map, used in furtherance of considering redistricting legislation.	LP2

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49	PDOC_006715	Representative Mike Schofield								Legislative	Data from confidential draft electoral map used in furtherance of considering draft redistricting legislation.	LP2
50	PDOC_006724	Representative Mike Schofield								Legislative	Confidential draft electoral map, used in furtherance of considering redistricting legislation.	LP2
51	PDOC_006725	Representative Mike Schofield								Legislative	Confidential internal notes on draft redistricting legislation, used in furtherance of considering redistricting legislation.	LP2
52	PDOC_006726	Representative Mike Schofield								Legislative	Confidential internal notes on draft redistricting legislation, used in furtherance of considering redistricting legislation.	LP2
53	PDOC_006729	Representative Mike Schofield								Legislative	Confidential internal notes on draft redistricting legislation, used in furtherance of considering redistricting legislation.	LP2
54	PDOC_006730	Representative Mike Schofield								Legislative	Confidential internal notes on draft redistricting legislation, used in furtherance of considering redistricting legislation.	LP2
55	PDOC_006731	Representative Mike Schofield								Legislative	Confidential internal notes on draft redistricting legislation, used in furtherance of considering redistricting legislation.	LP2
57	PDOC_006738	Representative Mike Schofield								Legislative	Confidential internal notes on draft redistricting legislation, used in furtherance of considering redistricting legislation.	LP2
58	PDOC_006739	Representative Mike Schofield								Legislative	Confidential draft electoral map, used in furtherance of considering redistricting legislation.	LP2
60	PDOC_006747	Representative Mike Schofield								Legislative	Confidential internal notes on draft redistricting legislation, used in furtherance of considering redistricting legislation.	LP2
61	PDOC_006748	Representative Mike Schofield								Legislative	Confidential draft electoral map, used in furtherance of considering redistricting legislation.	LP2
81	PDOC_004880	Senator Charles Perry		Matthew Dowling						Legislative	Confidential draft electoral map, used in furtherance of considering redistricting legislation.	LP2
86	PDOC_006522	Senator Jane Nelson								legislative	Data from confidential draft electoral map used in furtherance of considering draft redistricting legislation.	LP2
87	PDOC_006523	Senator Jane Nelson								Legislative	Data from confidential draft electoral map used in furtherance of considering draft redistricting legislation.	LP2
88	PDOC_006524	Senator Jane Nelson								Legislative	Data from confidential draft electoral map used in furtherance of considering draft redistricting legislation.	LP2

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103	DOC_0356952	Senator Paul Bettencourt	JPG			Marc Salvato	Paul Bettencourt			Legislative	Confidential communication regarding draft redistricting legislation.	LP2
104	DOC_0356953	Senator Paul Bettencourt	JPG			Marc Salvato	Paul Bettencourt			Legislative	Confidential communication regarding draft redistricting legislation.	LP2
118	DOC_0356971	Senator Paul Bettencourt	JPG							Legislative	Confidential draft electoral maps, used in furtherance of considering redistricting legislation.	LP2
119	DOC_0356972	Senator Paul Bettencourt	JPG							Legislative	Confidential draft electoral maps, used in furtherance of considering redistricting legislation.	LP2
120	DOC_0356973	Senator Paul Bettencourt	JPG							Legislative	Confidential draft electoral maps, used in furtherance of considering redistricting legislation.	LP2
121	DOC_0356974	Senator Paul Bettencourt	JPG							Legislative	Confidential draft electoral maps, used in furtherance of considering redistricting legislation.	LP2
126	DOC_0356980	Senator Paul Bettencourt	PNG							Legislative	Confidential draft electoral maps, used in furtherance of considering redistricting legislation.	LP2
127	DOC_0356981	Senator Paul Bettencourt	PNG							Legislative	Confidential draft electoral maps, used in furtherance of considering redistricting legislation.	LP2
128	DOC_0356982	Senator Paul Bettencourt	PNG							Legislative	Confidential draft electoral maps, used in furtherance of considering redistricting legislation.	LP2
129	DOC_0356983	Senator Paul Bettencourt	PNG							Legislative	Confidential draft electoral maps, used in furtherance of considering redistricting legislation.	LP2
130	DOC_0356984	Senator Paul Bettencourt	PNG							Legislative	Confidential draft electoral maps, used in furtherance of considering redistricting legislation.	LP2
131	DOC_0356985	Senator Paul Bettencourt	PNG							Legislative	Confidential draft electoral maps, used in furtherance of considering redistricting legislation.	LP2
132	DOC_0356986	Senator Paul Bettencourt	PNG							Legislative	Confidential draft electoral maps, used in furtherance of considering redistricting legislation.	LP2
133	DOC_0356987	Senator Paul Bettencourt	PNG							Legislative	Confidential draft electoral maps, used in furtherance of considering redistricting legislation.	LP2
134	DOC_0356989	Senator Paul Bettencourt	PNG							Legislative	Confidential draft electoral maps, used in furtherance of considering redistricting legislation.	LP2

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136	DOC_0356991	Senator Paul Bettencourt	PNG							Legislative	Confidential draft electoral maps, used in furtherance of considering redistricting legislation.	LP2
137	DOC_0356992	Senator Paul Bettencourt	PNG							Legislative	Confidential draft electoral maps, used in furtherance of considering redistricting legislation.	LP2
138	DOC_0356993	Senator Paul Bettencourt	PNG							Legislative	Confidential draft electoral maps, used in furtherance of considering redistricting legislation.	LP2
139	DOC_0356994	Senator Paul Bettencourt	PNG							Legislative	Confidential draft electoral maps, used in furtherance of considering redistricting legislation.	LP2
140	DOC_0356995	Senator Paul Bettencourt	PNG							Legislative	Confidential draft electoral maps, used in furtherance of considering redistricting legislation.	LP2
141	DOC_0356996	Senator Paul Bettencourt	PNG							Legislative	Confidential draft electoral maps, used in furtherance of considering redistricting legislation.	LP2
142	DOC_0356997	Senator Paul Bettencourt	PNG							Legislative	Confidential draft electoral maps, used in furtherance of considering redistricting legislation.	LP2
143	DOC_0356998	Senator Paul Bettencourt	PNG							Legislative	Confidential draft electoral maps, used in furtherance of considering redistricting legislation.	LP2
144	DOC_0356999	Senator Paul Bettencourt	PNG							Legislative	Confidential draft electoral maps, used in furtherance of considering redistricting legislation.	LP2
145	DOC_0357000	Senator Paul Bettencourt	PNG							Legislative	Confidential draft electoral maps, used in furtherance of considering redistricting legislation.	LP2
146	PDOC_004897	Senator Paul Bettencourt								Legislative	Confidential draft electoral maps, used in furtherance of considering redistricting legislation.	LP2
147	PDOC_005258	Senator Paul Bettencourt								Legislative	Confidential comparison of draft electoral maps, used in furtherance of considering redistricting legislation.	LP2
148	PDOC_005272	Senator Paul Bettencourt								Legislative	Confidential comparison of draft electoral maps, used in furtherance of considering redistricting legislation.	LP2
149	PDOC_005278	Senator Paul Bettencourt								Legislative	Confidential comparison of draft electoral maps, used in furtherance of considering redistricting legislation.	LP2

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151	PDOC_005723	Senator Robert Nichols								Legislative	Confidential internal notes on draft redistricting legislation, used in furtherance of considering redistricting legislation.	LP2
152	PDOC_005921	Senator Robert Nichols								Legislative	Confidential internal notes on draft redistricting legislation, used in furtherance of considering redistricting legislation.	LP2
153	PDOC_006001	Senator Robert Nichols								Legislative	Confidential internal notes on draft redistricting legislation, used in furtherance of considering redistricting legislation.	LP2
154	PDOC_006010	Senator Robert Nichols								Legislative	Confidential internal notes on draft redistricting legislation, used in furtherance of considering redistricting legislation.	LP2
156	PDOC_006050	Senator Robert Nichols								Legislative	Confidential internal notes on draft redistricting legislation, used in furtherance of considering redistricting legislation.	LP2
160	PDOC_006125	Senator Robert Nichols								Legislative	Confidential internal notes on draft redistricting legislation, used in furtherance of considering redistricting legislation.	LP2

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Gober	114	114:14-115:3	Grant, improper objection
Gober	130	130:17-23	Grant, improper objection
Gober	132	132:24-135:4	Grant 133:19-20, improper objection, deny others LP2
Gober	135	135:5-13	LP2
Gober	135	135:19-136:4	LP2
Gober	137	137:7-24	LP2
Gober	137	137:25-138:12	LP2
Gober	140	140:2-7	LP2
Gober	141	141:24-142:5	LP2
Gober	142	142:11-143:5	LP2
Gober	145	145:13-147:23	Grant 46:21-22, improper objection, deny others LP2
Gober	148	148:5-152:22	LP2
Gober	153	153:10-24	LP2
Gober	154	154:6-155:19	Grant 154:11-12, improper objection, deny others LP2
Gober	158	158:23-159:23	LP2
Gober	161	161:13-163:7	Grant 162:20-21, improper objection, deny others LP2
Gober	170	170:8-171:7	LP2
Gober	176	176:2-17	LP2
Gober	181	181:3-22	LP2
Gober	182	182:6-22	LP2
Gober	196	196:18-198:4	Grant 197:2-3, improper objection, deny others LP2
Gober	198	198:5-22	Grant, improper objection
Gober	199	199:12-23	LP2
Gober	204	204:19-205:10	Grant, improper objection
Gober	206	206:10-22	LP2
Gober	207	207:8-208:6	LP2
Gober	208	208:22-209:6	LP2
Gober	209	209:17-23	LP2
Gober	212	212:20-213:5	LP2
Gober	218	218:12-219:7	LP2
Gober	219	219:24-220:21	Grant, improper objection
Gober	220	220:22-221:7	LP2
Gober	222	22:2-12	LP2
Gober	223	223:3-224:4	LP2
Gober	224	224:12-226:20	LP2
Gober	240	240:14-241:8	LP2
Gober	245	245:18-246:6	Grant, improper objection
Gober	250	250:1-252:14	LP2
Gober	252	252:18-253:22	LP2
Gober	259	259:25-260:23	Grant, improper objection,
Gober	262	262:2-8	LP2
Gober	264	264:17-265:9	LP2
Gober	266	266:11-25	LP2
Gober	280	280:17-283:3	LP2
Lozano	59	59:14-60:4	LP1
Lozano	90	90:8;91:19-93:4	LP1
Lozano	106	106:7-107:1	LP1
Opperman	46	46:03-47:07	LP2
Opperman	59	59:19-62:25	Grant, 62:7-8 and 62:24-25, improper objection, deny others LP2
Opperman	66	66:10-70:24	LP2
Opperman	74	74:16-74:22	LP2
Opperman	76	76:04-76:12	LP2
Opperman	89	89:24-90:13	LP2
Opperman	90	90:14-91:03	LP2
Opperman	91	91:10-91:14	LP2
Opperman	91	91:15-92:05	LP2
Opperman	92	92:09-92:25	Grant, improper objection
Opperman	93	93:01-93:20	LP2
Opperman	94	94:08-94:15	LP2
Opperman	105	105:25-106:08	LP2
Opperman	113	113:02-113:08	LP2

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Deponent	Starting Page Number	LineNumber	RULING
Opperman	113	113:09-113:14	LP2
Opperman	114	114:17-115:8	LP2
Opperman	122	122:19-123:07	LP2
Opperman	123	123:23-125:14	LP2
Opperman	131	131:22-132:03	LP2
Opperman	134	134:16-134:22	LP2
Opperman	135	135:13-136:16	LP2
Opperman	139	139:03-139:09	LP2
Opperman	139	139:15-140:11	LP2
Opperman	140	140:19-140:25	LP2
Opperman	141	141:11-141:17	LP2
Opperman	175	175:11-176:16	LP2
Opperman	226	226:13-229:24	LP2
Opperman	231	231:13-231:22	LP2
Opperman	247	247:24-249:14	LP2
Opperman	249	249:21-250:23	LP2
Opperman	250	250:24-252:11	LP2
Opperman	252	252:12-253:18	LP2
Opperman	268	268:4-269:6	LP2
Opperman	285	285:25-292:12	LP2
Opperman	292	292:21-295:13	LP2
Opperman	295	295:14-296:03	LP2
Opperman	296	296:04-296:09	LP2
Opperman	301	301:21-302:15	LP2
Opperman	312	312:16-313:06	LP2
Opperman	313	313:07-313:13	LP2
Jetton	56	56:3-57:3	LP1
Jetton	137	137:16-138:11	LP1
Jetton	145	145:13-20	LP1, LP3 to the extent public
Jetton	146	146:4-147:24	LP1
Shine	18	18:7-19:6	LP1
Shine	35	35:3-35:21	LP1
Shine	36	36:4-37:22	LP1
Shine	38	38:16-38:25	LP1
Shine	39	39:5-39:11	LP1
Shine	39	39:12-40:5	LP1
Shine	40	40:6-42:2	Grant 41:17, LP3, deny others LP1
Shine	97	97:16-97:22,98:10-98:20	LP1
Shine	104	104:7-104:13	LP1
Buckley	59	59:4-60:3	LP1
Buckley	83	83:23-85:24	LP1
Buckley	129	129:6-129:20	LP1
Buckley	194	194:6-194:19	LP1
Mackin	26	26:22-27:3	LP2
Mackin	27	27:16-27:22	LP2
Mackin	27	27:23-28:14	LP2
Mackin	28	28:15-28:20	Grant, improper objection
Mackin	30	30:20-30:24	LP2
Mackin	30	30:25-31:5	LP2
Mackin	31	31:9-31:15	LP2
Mackin	31	31:15-32:6	LP2
Mackin	32	32:9-32:12	LP2
Mackin	33	33:11-33:18	LP2
Mackin	33	33:19-34:8	LP2
Mackin	34	34:9-34:14	LP2
Mackin	36	36:9-36:15	LP2
Mackin	36	36:16-36:24	LP2
Mackin	37	37:17-38:7	LP2
Mackin	38	38:8-38:13	LP2
Mackin	38	38:14-38:21	LP2
Mackin	38	38:14-38:21	LP2
Mackin	38	38:22-39:1	LP2
Mackin	39	39:2-39:5	LP2
Mackin	40	40:20-41:4	LP2
Mackin	42	42:3-42:10	LP2
Mackin	43	43:10-43:14	LP2
Mackin	43	43:15-43:19	LP2
Mackin	45	45:24-46:4	LP2
Mackin	47	47:9-47:15	LP2
Mackin	47	47:16-47:21	LP2
Mackin	47	47:22-47:24	LP2
Mackin	49	49:25-50:7	LP2
Mackin	50	50:8-50:14	LP2
Mackin	53	53:17-53:24	LP2
Mackin	55	55:25-56:8	LP2

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Deponent	Starting Page Number	LineNumber	RULING
Mackin	58	58:17-58:23	LP2
Mackin	58	58:25-59:9	LP2
Mackin	59	59:10-59:18	LP2
Mackin	60	60:15-60:21	LP2
Mackin	60	60:22-61:5	LP2
Mackin	61	61:6-61:12	LP2
Mackin	61	61:13-61:18	LP2
Mackin	62	62:13-63:4	LP2
Mackin	115	115:8-115:19	LP2
Mackin	115	115:20-116:	LP2
Mackin	116	116:21-117:5	Grant, improper objection
Mackin	149	149:22-149:15	LP2
Mackin	170	170:12-170:21	LP3
Mackin	185	185:8-185:23	LP2
Mackin	187	187:21-188:10	LP2
Mackin	193	193:19-193:23	LP2
Mackin	195	195:10-195:19	LP2
Mackin	195	195:20-195:25	LP2
Mackin	196	196:1-196:7	LP2
Mackin	196	196:8-196:16	LP2
Mackin	200	200:2-200:8	LP2
Mackin	205	205:23-206:21	LP2
Mackin	208	208:13-208:19	LP2
Mackin	209	209:1-209:10	Grant, improper objection
Mackin	209	209:11-209:16	LP2
Mackin	210	210:6-210:12	LP2
Mackin	210	210:13-210:23	LP2
Mackin	210	210:24-211:9	LP2
Mackin	211	211:1011:-15	Grant, no objection made
Mackin	212	212:10-212:20	LP2
Mackin	213	213:9-213:19	LP2
Mackin	213	213:25-214:4	LP2
Mackin	215	215:9-215:20	LP2
Mackin	237	237:19-238:3	LP2
Mackin	238	238:4-238:12	LP2
Mackin	239	239:4-239:8	LP2
Mackin	239	239:9-239:16	LP2
Mackin	239	239:17-239:24	LP2
Mackin	240	240:23-241:5	LP2
Mackin	242	242:10-242:22	LP2
Mackin	244	244:19-244:24	LP2
Mackin	151	151:10-151:15	LP2
Mackin	261	261:25-262:5	LP2
Mackin	263	263:1-263:5	LP2
Mackin	262	262:12-262:24	LP2
Mackin	262	262:25-263:11	LP2
Landgraf	118	118:9-119:4	LP1
Landgraf	119	119:5-119:21	LP1
Landgraf	144	144:6-145:5	LP1
Landgraf	156	156:3-157:16	LP1
Hunter	178	178:22-179:6	Grant, no objection made
Hunter	179	179:7-180:13	LP1
Foltz	102	102:8-102:14	LP4

Deponent	Starting Page Number	Line Number	Ruling
Murr	100	100:9–101:3	LP1
Murr	114	114:23–115:16	LP1
Garcia	139	139:20–140:4	LP4
Lozano	6	6:9–6:13	LP1
Lozano	62	62:11–64:7	LP1
Lozano	64	64:22–65:10	LP1
Lozano	66	66:3–66:12	LP1
Lozano	74	74:24–76:9	LP1
Lozano	79	79:19–79:20	LP3
Lozano	102	102:22-104:1	LP3
Jetton	42	42:4-10	LP1
Jetton	42	42:11-16	LP1
Jetton	119	119:6-17	LP1
Jetton	132	132:22-133:3	LP3
Jetton	138	138:21-139:5	LP3
Jetton	140	140:11-20	LP1
Jetton	188	188:19-189:3	LP3
Jetton	189	189:23-190:10	LP3
Jetton	197	197:3-12	LP3
Jetton	199	199:19-200:3	LP1
Jetton	200	200:4-10	LP3
Jetton	200	200:11-201:14	LP1
Jetton	202	202:16-203:16	LP3
Jetton	203	203:21-204:17	LP1
Jetton	207	207:13-17	Grant, no objection
Shine	108	108:12–109:5	Grant, no objection
Shine	125	125:20–126:1	LP1
Shine	126	126:13–126:23	LP3
Buckley	39	39:14–39:18	LP3
Mackin	63	63:18–64:4	LP2
Mackin	90	90:2–90:3	Grant, no objection
Mackin	90	90:8–90:12	Grant, no objection
Mackin	100	100:11–100:20	LP2
Mackin	103	103:22–104:13	LP2
Mackin	149	149:15–149:19	LP2
Mackin	162	162:11–162:17	LP2
Mackin	170	170:12–170:21	LP2
Mackin	175	175:6–175:24	LP2
Mackin	179	179:18–180:10	LP2
Mackin	199	199:12–200:1	LP2
Mackin	203	203:9–204:2	LP2
Mackin	229	229:2–229:14	LP2
Mackin	247	247:3–247:6	Grant, improper objection
Landgraf	104	104:21–105:8	LP1
Landgraf	118	118:9–119:4	LP1
Landgraf	133	133:21–137:3	LP3
Landgraf	188	188:24–190:15	LP1
Landgraf	192	192:4–192:12	LP1
Todd Hunter	69	69:8-78:17	Grant 73:9-10, 18-19, 74:21-22, 75:1-2, LP3, deny others LP1
Todd Hunter	70	70:17-72:10	LP1
Todd Hunter	73	73:15-23	LP3
Todd Hunter	74	74:13-78:4	Grant 74:21-22, 75:1-2, deny others LP1
Todd Hunter	75	75:16-76:14	LP1
Todd Hunter	79	79:10-81:25	LP1
Todd Hunter	85	85:9-86:21	LP3
Todd Hunter	86	86:7-12	LP3
Todd Hunter	97	97:11-99:8	Grant, 98:15-16, LP3, deny others LP1
Todd Hunter	111	111:14-25	LP3
Todd Hunter	121	121:4-122:4	LP3
Todd Hunter	121	121:4-18	LP3

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Deponent	Starting Page Number	Line Number	Ruling
Todd Hunter	124	124:3-10	LP1
Todd Hunter	125	125:25-126:7	Grant, no objection
Todd Hunter	127	127:7-22	LP1
Todd Hunter	127	127:7–127:15	LP3
Todd Hunter	157	157:13–158:13	LP1
Todd Hunter	186	186:10-15	LP1
Todd Hunter	188	188:9-22	LP1
Todd Hunter	195	195:19-196:12	LP1
Todd Hunter	267	267:9-16	LP3
Todd Hunter	290	290:13-291:7	LP1
Todd Hunter	308	308:18-309:2	LP1
Opperman	43	43:10-46:16	LP2
Opperman	47	47:08-49:20	LP2
Opperman	105	105:15-105:24	LP2
Opperman	106	106:15-107:11	LP2
Opperman	111	111:04-111:12	LP2
Opperman	128	128:20-129:16	LP2
Opperman	151	151:06-151:12	LP2
Opperman	174	174:09-175:02	LP2
Opperman	176	176:17-177:08	LP3
Opperman	178	178:22-179:06	LP2
Opperman	188	188:09-188:24	LP2
Opperman	209	209:10-209:24	LP2
Opperman	210	210:16-211:17	LP2
Opperman	211	211:22-212:02	LP2
Opperman	213	213:04-213:18	LP3
Opperman	213	213:21-234:10	LP3
Opperman	234	234:18-235:21	Grant 234:23-24, LP3, deny others LP2
Opperman	236	236:09-236:17	LP2
Opperman	236	236:23-237:05	LP2
Opperman	242	242:09-243:13	LP2
Opperman	270	270:13-272:17	Grant 271:1-2, 9-11, LP3, deny others LP2
Opperman	274	274:23-275:04	LP2
Opperman	304	304:10-305:13	LP2
Opperman	309	309:20-310:24	LP2
Foltz	150	150:6 – 150:17	LP1
Foltz	150	150:14 – 150:17	Grant, no objection
Foltz	194	194:13 – 194:20	LP1
Foltz	269	269:20 – 270:4	LP1

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Deponent	Starting Page Number	Line Number	Ruling
Rep. Murr	130	130:18-132:2	LP1
Rep. Murr	136	136:11-136:23	LP1
Rep. Murr	139	139:22-140:14	LP1
Colleen Garcia	47	47:14-48:13	LP2
Colleen Garcia	47	47:14-48:13	LP2
Colleen Garcia	48	48:19-49:3	LP2
Chris Gober	207	207:8-208:6	LP2
Rep. Lozano	64	64:22-67:19	LP1
Rep. Lozano	66	66:3-66:12	LP1
Opperman	189	189:20-190:14	LP2
Opperman	302	302:25-304:3	LP2
Opperman	317	317:21-318:21	LP2
Rep. Jetton	215	215:11-18	LP1
Rep. Shine	15	15:2-16:3	LP1
Rep. Shine	16	16:11-16:19	LP1
Rep. Shine	16	16:20-17:25	LP1
Rep. Shine	18	18:7-19:6	LP1
Rep. Shine	55	55:1-56:8	LP3
Rep. Buckley	27	27:1-27:23	LP4
Rep. Buckley	36	36:1-36:17	LP1
Rep. Buckley	43	43:25-44:23	LP4
Rep. Buckley	47	47:16-48:5	LP4
Anna Mackin	112	112:6-112:14	LP2
Anna Mackin	87	87:7-87:18	LP4
Anna Mackin	120	120:1-120:9	LP4
Anna Mackin	120	120:10-120:14	LP4
Anna Mackin	123	123:18-124:2	LP4
Anna Mackin	255	255:4-255:9	LP4
Rep. Landgraf	59	59:25-58:20	LP1
Rep. Landgraf	60	60:3-60:14	LP1
Rep. Landgraf	69	69:3-69:18	Grant, improper objection
Rep. Landgraf	69	69:25-70:9	Grant, improper objection
Rep. Landgraf	70	70:16-70:21	Grant, improper objection
Rep. Hunter	47	47:10-48:7	LP1
Rep. Hunter	47	47:16-22	LP1
Rep. Hunter	48	48:1-7	LP1
Rep. Hunter	59	59:13-63:5	Grant, 62:23-24, improper objection, deny others LP1
Rep. Hunter	136	136:22-137:24	LP1
Rep. Hunter	136	136:23-139:21	LP1
Rep. Hunter	138	138:25-139:10	LP1
Rep. Hunter	142	142:25-143:12	LP1
Rep. Hunter	228	228:10-229:1	LP1
Adam Foltz	180	180:4-180:22	LP2
Adam Foltz	181	181:5-181:10	LP2
Adam Foltz	287	287:7-287:24	LP2

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Deponent	Starting Page Number	Line Number	Ruling
Rep. Murr	76	76:17-77:20	LP1
Rep. Murr	78	78:6-79:5	LP1
Rep. Murr	83	83:18-84:8	LP1
Rep. Murr	84	84:9-86:4	LP1
Rep. Murr	86	86:5-86:24	LP1
Rep. Murr	90	90:21-92:3	LP1
Rep. Murr	109	109:17-108:9	LP1
Rep. Murr	111	111:3-111:15	LP1
Rep. Murr	111	111:16-111:14	LP1
Rep. Murr	111	111:25-113:3	LP1
Rep. Murr	114	114:2-115:16	LP1
Rep. Murr	116	116:1-116:13	LP1
Rep. Murr	118	118:3-119:12	LP1
Rep. Murr	119	119:13-120:9	LP1
Rep. Murr	121	121:19-123:11	LP1
Rep. Murr	123	123:12-124:4	LP1
Rep. Murr	130	130:18-132:2	LP1
Rep. Murr	133	133:3-133:12	LP1
Rep. Murr	136	136:11-136:23	LP1
Rep. Murr	139	139:22-140:14	LP1
Rep. Murr	143	143:8-143:25	LP1
Rep. Murr	149	149:20-150:14	LP1
Rep. Murr	159	159:5-159:19	LP1
Rep. Murr	159	159:20-160:10	LP1
Rep. Murr	160	160:15-160:21	LP1
Rep. Huberty	23	23:18-24:10	LP1
Rep. Huberty	25	25:20-26:13	LP1
Rep. Huberty	27	27:1-28:4	LP1
Rep. Huberty	28	28:5-29:18	LP1
Rep. Huberty	32	32:22-33:8	LP1
Rep. Huberty	43	43:1-43:13	LP1
Rep. Huberty	60	60:1-61:19	LP1
Rep. Huberty	62	62:12-65:4	LP1
Rep. Huberty	67	67:2-67:10	LP1
Rep. Huberty	72	72:4-73:13	LP1
Rep. Lozano	26	26:23-27:9	LP1
Rep. Lozano	112	112:25-113:5	LP1
Rep. Lozano	113	113:6-113:18	LP1
Rep. Lozano	127	127:21-128:13	LP1
Sean Opperman	43	43:10-46:16	Grant 44:20-21, improper objection, deny others LP 2
Sean Opperman	47	47:08-49:20	LP2
Sean Opperman	49	49:21-53:25	LP2
Sean Opperman	52	52:06-52:24	LP2
Sean Opperman	53	53:06-53:25	LP2
Sean Opperman	59	59:19-62:25	LP4
Sean Opperman	66	66:10-70:24	LP2
Sean Opperman	76	76:04-76:12	LP2
Sean Opperman	76	76:13-76:19	LP2
Sean Opperman	77	77:25-77:02	LP2
Sean Opperman	77	77:11-77:18	LP2
Sean Opperman	77	77:19-78:01	LP2
Sean Opperman	78	78:22-79:06	LP2
Sean Opperman	79	79:12-79:18	LP2
Sean Opperman	79	79:19-79:24	LP2
Sean Opperman	79	79:25-80:07	LP2
Sean Opperman	81	81:09-81:24	LP2
Sean Opperman	81	81:25-82:24	LP2
Sean Opperman	82	82:25-83:04	LP2
Sean Opperman	83	83:05-84:05	LP2
Sean Opperman	84	84:06-84:21	LP2

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Deponent	Starting Page Number	Line Number	Ruling
Sean Opperman	85	85:12-85:20	LP2
Sean Opperman	91	91:15-92:05	LP2
Sean Opperman	92	92:09-92:25	Grant, improper objection
Sean Opperman	93	93:01-93:11	LP2
Sean Opperman	94	94:08-94:15	LP2
Sean Opperman	97	97:24-98:10	LP2
Sean Opperman	101	101:25-102:08	LP2
Sean Opperman	104	104:21-105:4	LP2
Sean Opperman	105	105:15-105:24	LP2
Sean Opperman	105	105:25-106:08	LP2
Sean Opperman	106	106:09-106:14	LP2
Sean Opperman	106	106:15-107:11	LP2
Sean Opperman	107	107:12-107:20	LP2
Sean Opperman	117	117:2-117:19	LP2
Sean Opperman	118	118:16-118:22	LP2
Sean Opperman	121	121:16-122:05	LP2
Sean Opperman	125	125:15-125:25	LP2
Sean Opperman	132	132:04-132:11	LP2
Sean Opperman	134	134:16-134:22	LP2
Sean Opperman	161	161:16-163:01	LP2
Sean Opperman	191	191:18-197:12	Grant, 191:24-25, improper objection, deny others LP2
Sean Opperman	227	227:25-229:07	LP2
Sean Opperman	231	231:08-231:12	LP2
Sean Opperman	231	231:13-231:22	LP2
Sean Opperman	263	263:02-264:08	LP2
Sean Opperman	300	300:07-301:01	LP2
Sean Opperman	305	305:14-307:25	LP2
Sean Opperman	308	308:1-308:24	LP2
Rep. Jetton	117	117:18-23	LP3
Rep. Shine	20	20:6-20:25	LP1
Rep. Shine	30	30:12-30:20	Grant, improper objection
Rep. Shine	33	33:3-35:2	LP1
Rep. Shine	42	42:12-44:5	LP1
Rep. Shine	45	45:14-47:15	LP1
Rep. Shine	49	49:21-50:10	LP1
Rep. Shine	52	52:17-52:22	LP1
Rep. Shine	54	54:11-54:20	LP1
Rep. Shine	55	55:1-56:8	LP1
Rep. Shine	67	67:19-67:24	LP1
Rep. Shine	74	74:14-74:19	LP3
Rep. Shine	79	79:1-79:6	LP3
Rep. Shine	97	97:23-98:9	LP1
Rep. Shine	109	109:6-109:11	LP1
Rep. Shine	110	110:5-110:23	LP1
Rep. Shine	140	140:16-140:23	LP1
Rep. Shine	150	150:19-151:8	Grant, improper objection
Rep. Buckley	36	36:18-36:22	LP4
Rep. Buckley	111	111:4-111:21	LP1
Rep. Buckley	148	148:7-148:18	LP1
Rep. Buckley	167	167:6-167:24	LP1
Rep. Buckley	221	221:5-221:10	LP1
Rep. Buckley	230	230:5-230:21	LP1
Rep. Buckley	252	252:17-253:13	LP1
Rep. Buckley	259	259:4-259:10	LP1
Rep. Buckley	262	262:14-263:25	LP1
Rep. Buckley	268	268:1-268:13	LP1
Anna Mackin	78	78:19-79:9	LP2
Anna Mackin	167	167:16-167:19	LP2
Anna Mackin	167	167:19-167:23	LP2
Anna Mackin	167	167:24-168:1	LP2

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Anna Mackin	169	169:25-170:11	LP2
Anna Mackin	172	172:11-172:17	LP2
Anna Mackin	172	172:18-173:3	LP2
Anna Mackin	173	173:6-173:18	Grant, improper objection
Anna Mackin	173	173:19-173:21	LP2
Anna Mackin	173	173:22-173:25	LP2
Anna Mackin	174	174:1-174:4	LP2
Anna Mackin	174	174:5-174:8	LP2
Anna Mackin	178	178:9-178:14	LP2
Anna Mackin	230	230:2-230:9	LP2
Anna Mackin	230	230:17-230:25	LP2
Anna Mackin	231	231:1-231:7	LP2
Anna Mackin	231	231:8-231:14	LP2
Anna Mackin	231	231:15-232:1	LP2
Anna Mackin	247	247:7-247:16	LP2
Anna Mackin	247	247:17-247:23	LP2
Anna Mackin	249	249:14-249:19	LP2
Anna Mackin	249	249:20-250:7	Grant, improper objection
Anna Mackin	250	250:8-250:12	LP2
Rep. Landgraf	130	130:22-131:24	LP1
Rep. Landgraf	188	188:24-190:15	LP1
Rep. Landgraf	271	271:11-273:5	Grant, improper objection
Rep. Landgraf	277	277:6-278:4	LP1
Rep. Landgraf	279	279:4-280:23	LP1
Rep. Landgraf	280	280:24-281:23	LP1
Rep. Landgraf	288	288:16-288:23	LP1
Rep. Hunter	54	54:22-56:3	LP1
Rep. Hunter	64	64:1-67:7	LP1
Rep. Hunter	68	68:3-69:6	LP1
Rep. Hunter	69	69:8-70:16	LP1
Rep. Hunter	72	72:11-73:5	LP1
Rep. Hunter	73	73:6-14	LP4
Rep. Hunter	176	176:11-14	Grant, improper objection
Rep. Hunter	186	186:10-15	LP1
Rep. Hunter	188	188:9-22	LP1
Rep. Hunter	290	290:13-291:7	LP1
Rep. Hunter	308	308:18-309:2	LP1
Adam Foltz	32	32:17-33:13	Grant, no objection made
Adam Foltz	32	32:17-33:23	LP2
Adam Foltz	33	33:24-35:25	LP2
Adam Foltz	34	34:7-35:25	LP2
Adam Foltz	35	35:3-36:9	LP2
Adam Foltz	62	62:23-63:6	LP2
Adam Foltz	96	96:3-98:20	LP3 for public demographic information
Adam Foltz	96	96:3-24	LP3 for public demographic information
Adam Foltz	97	97:19-98:14	LP2
Adam Foltz	97	97:19-98:20	LP2
Adam Foltz	98	98:15-20	LP2
Adam Foltz	105	105:23-106:14	LP2
Adam Foltz	105	105:23-108:23	LP2
Adam Foltz	107	107:15-22	LP2
Adam Foltz	107	107:23-108:9	LP2
Adam Foltz	108	108:10-17	LP2
Adam Foltz	114	114:25-115:5	LP2
Adam Foltz	115	115:6-10	LP2
Adam Foltz	115	115:11-17	LP2
Adam Foltz	116	116:8-18	LP2
Adam Foltz	117	117:15-118:4	LP2
Adam Foltz	118	118:5-13	LP2
Adam Foltz	118	118:19-24	LP2

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Adam Foltz	118	118:25-119:8	LP2
Adam Foltz	119	119:9-14	LP2
Adam Foltz	119	119:15-19	LP2
Adam Foltz	119	119:20-120:1	LP2
Adam Foltz	120	120:13-17	LP2
Adam Foltz	120	120:18-22	LP2
Adam Foltz	120	120:23-121:11	LP2
Adam Foltz	127	127:9-128:1	LP2
Adam Foltz	128	128:10-19	LP2
Adam Foltz	128	128:20-129:4	LP2
Adam Foltz	134	134:15-23	LP2
Adam Foltz	135	135:13-20	LP2
Adam Foltz	135	135:21-136:3	LP2
Adam Foltz	138	138:25-139:10	LP2
Adam Foltz	139	139:20-24	LP2
Adam Foltz	139	139:25-140:5	LP4
Adam Foltz	141	141:5-142:5	LP2
Adam Foltz	142	142:24-143:6	LP2
Adam Foltz	170.00	170:18-171:8	LP2
Adam Foltz	171	171:14-172:21	LP2
Adam Foltz	172.00	172:22-173:12	LP2
Adam Foltz	173.00	173:13-18	LP2
Adam Foltz	173.00	173:19-24	LP2
Adam Foltz	173.00	173:25-174:6	Grant, no objection made
Adam Foltz	174.00	174:7-11	LP2
Adam Foltz	174.00	174:12-17	LP2
Adam Foltz	183.00	183:14-19	LP2
Adam Foltz	184.00	184:16-185:7	LP2
Adam Foltz	190.00	190:7-17	LP2
Adam Foltz	190.00	190:18-22	LP2
Adam Foltz	190.00	190:23-191:3	LP2
Adam Foltz	191.00	191:11-15	LP2
Adam Foltz	191.00	191:16-22	LP2
Adam Foltz	191.00	191:23-192:6	LP2
Adam Foltz	192.00	192:7-11	LP2
Adam Foltz	193.00	193:22-194:1	LP2
Adam Foltz	194.00	194:2-7	LP2
Adam Foltz	194.00	194:21-195:2	LP2
Adam Foltz	201.00	201:22-202:7	LP2
Adam Foltz	205.00	205:21-25	LP2
Adam Foltz	206.00	206:1-6	LP2
Adam Foltz	206	206:7-16	LP2
Adam Foltz	207	207:3-8	LP2
Adam Foltz	209	209:11-25	LP2
Adam Foltz	212	212:16-23	LP2
Adam Foltz	212	212:24-213:6	LP2
Adam Foltz	214	214:9-23	LP4
Adam Foltz	219	219:24-220:6	LP2
Adam Foltz	224	224:9-13	LP2
Adam Foltz	231	231:9-20	LP2
Adam Foltz	231	231:21-232:2	LP2
Adam Foltz	234	234:5-10	LP2
Adam Foltz	234	234:11-18	LP2
Adam Foltz	234	234:19-235:1	LP2
Adam Foltz	235	235:8-12	LP2
Adam Foltz	235	235:8-236:15	LP2
Adam Foltz	235	235:13-13	LP2
Adam Foltz	235	235:14-18	LP2
Adam Foltz	235	235:19-236:5	LP2
Adam Foltz	236	236:6-10	LP2

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Adam Foltz	236	236:11-15	LP2
Adam Foltz	240	240:13-19	LP2
Adam Foltz	240	240:20-241:20	LP2
Adam Foltz	242	242:18-23	LP2
Adam Foltz	245	245:15-21	LP2
Adam Foltz	245	245:22-246:3	LP2
Adam Foltz	249	249:12-20	LP2
Adam Foltz	250	250:13-251:2	LP2
Adam Foltz	251	251:19-252:1	LP2
Adam Foltz	260	260:6-16	LP2
Adam Foltz	260	260:17-25	LP2
Adam Foltz	261	261:21-262:7	LP2
Adam Foltz	270	270:9-17	LP2
Adam Foltz	270	270:18-271:1	LP2
Adam Foltz	271	271:2-7	LP2
Adam Foltz	280	280:6-17	LP2
Adam Foltz	280	280:18-24	LP2
Adam Foltz	282	282:23-283:7	LP2
Adam Foltz	283	283:8-13	LP2
Adam Foltz	284	284:18-285:1	LP2
Adam Foltz	285	285:2-7	Grant, improper objection
Adam Foltz	286	286:3-8	LP2
Adam Foltz	289	289:4-11	LP2
Adam Foltz	289	289:4-9	LP2

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Rep. Murr	76	76:17-77:20	LP1
Rep. Murr	113	113:4-113:20	LP1
Rep. Murr	159	159:20-160:10	LP1
Sen. Hancock	17	17:6-17:10	LP1
Sen. Hancock	20	20:3-20:14	Grant, improper objection
Sen. Hancock	46	46:16-46:23	Grant, improper objection
Sen. Hancock	55	55:25-56:12	LP1
Sen. Hancock	61	61:1-61:6	Grant, improper objection
Sen. Hancock	66	66:8-66:14	LP1
Sen. Hancock	66	66:15-66:21	LP1
Sen. Hancock	66	66:22-67:5	LP1
Sen. Hancock	67	67:17-67:19	LP1
Sen. Hancock	112	112:20-112:25	Grant, improper objection
Sen. Hancock	118	118:22-119:2	LP1
Sen. Hancock	119	119:4-119:8	LP1
Sen. Hancock	119	119:9-119:13	Grant, improper objection
Sen. Hancock	119	119:18-119:24	LP1
Sen. Hancock	120	120:1-120:7	LP1
Sen. Hancock	120	120:8-120:18	Grant, improper objection
Sen. Hancock	122	122:18-123:1	LP1
Sen. Hancock	123	123:23-124:1	LP1
Sen. Hancock	124	124:3-124:9	LP1
Sen. Hancock	164	164:3-164:9	LP1
Sen. Hancock	182	182:9-182:17	LP1
Colleen Garcia	46	46:14-47:3	LP2
Colleen Garcia	48	48:19-49:3	LP2
Colleen Garcia	54	54:8-54:22	LP2
Colleen Garcia	62	62:11-63:8	LP2
Colleen Garcia	65	65:13-65:18	LP2
Colleen Garcia	65	65:23-66:4	LP2
Colleen Garcia	66	66:8-66:14	LP2
Colleen Garcia	68	68:17-68:25	LP2
Colleen Garcia	69	69:20-70:8	LP2
Colleen Garcia	71	71:20-72:2	LP2
Colleen Garcia	72	72:10-72:16	LP2
Colleen Garcia	72	72:17-72:25	LP2
Colleen Garcia	73	73:8-73:18	LP2
Colleen Garcia	73	73:19-74:1	LP2
Colleen Garcia	75	75:2-75:13	LP2
Colleen Garcia	75	75:14-76:4	LP2
Colleen Garcia	76	76:5-76:17	LP2
Colleen Garcia	76	76:18-77:24	LP2
Colleen Garcia	77	77:25-78:16	LP2
Colleen Garcia	82	82:21-83:8	LP2
Colleen Garcia	83	83:15-83:22	LP2
Colleen Garcia	83	83:23-84:8	LP2
Colleen Garcia	85	85:1-85:9	LP2
Colleen Garcia	86	86:21-87:3	LP2
Colleen Garcia	91	91:13-91:22	LP2
Colleen Garcia	109	109:11-110:10	LP2
Colleen Garcia	112	112:1-112:21	LP2
Colleen Garcia	113	113:24-115:6	LP2
Colleen Garcia	117.4-117.16	117.4-117.16	LP4
Colleen Garcia	119.21-120.9	119.21-120.9	LP2
Colleen Garcia	121.10-122.19	121.10-122.19	LP2
Colleen Garcia	122	122:20-123:25	LP2
Colleen Garcia	125	125:9-127:15	LP2
Colleen Garcia	128	128:5-129:16	LP2
Colleen Garcia	132	132:11-132:21	LP2
Colleen Garcia	133	133:4-134:2	LP2
Colleen Garcia	136	136:8-136:15	LP4
Colleen Garcia	139	139:20-140:4	LP4

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Colleen Garcia	141	141:18-142:14	LP2
Colleen Garcia	144	144:5-145:1	Deny 144:20-21, LP2, grant others LP4
Colleen Garcia	145	145:20-146:10	LP2
Colleen Garcia	148	148:7-148:21	LP2
Colleen Garcia	150	150:1-150:11	LP2
Colleen Garcia	156	156:24-157:13	LP2
Colleen Garcia	159	159:16-160:1	LP2
Colleen Garcia	160	160:6-161:8	Grant, 160:11-12, improper objection, grant others LP4
Colleen Garcia	163	163:15-163:22	LP2
Colleen Garcia	164	164:6-164:14	LP2
Colleen Garcia	166	166:25-167:10	LP2
Colleen Garcia	167	167:22-168:8	LP4
Colleen Garcia	169	169:9-169:25	LP2
Colleen Garcia	170	170:1-171:5	LP2
Colleen Garcia	171	171:6-172:14	LP2
Colleen Garcia	175	175:24-176:3	LP2
Colleen Garcia	176	176:4-176:25	LP2
Colleen Garcia	178	178:16-179:11	LP2
Colleen Garcia	180	180:9-180:23	LP2
Colleen Garcia	182	182:1-182:7	LP2
Colleen Garcia	182	182:16-184:5	LP2
Colleen Garcia	185	185:10-186:4	LP2
Colleen Garcia	187	187:19-188:12	LP2
Colleen Garcia	188	188:13-189:13	LP2
Colleen Garcia	190	190:3-191:21	LP2
Colleen Garcia	191	191:19-193:15	LP2
Colleen Garcia	194	194:15-195:15	LP2
Colleen Garcia	197	197:7-197:17	LP2
Colleen Garcia	200	200:8-200:16	LP2
Colleen Garcia	201	201:1-201:11	LP2
Colleen Garcia	202	202:21-203:1	LP2
Colleen Garcia	203	203:19-204:4	LP2
Colleen Garcia	204	204:5-204:19	LP4
Colleen Garcia	205	205:18-206:5	LP2
Colleen Garcia	207	207:19-209:3	LP2
Colleen Garcia	209	209:12-209:18	LP2
Colleen Garcia	209	209:19-210:10	LP2
Colleen Garcia	210	210:11-211:4	LP2
Colleen Garcia	214	214:4-214:13	LP2
Colleen Garcia	215	215:14-215:23	LP2
Colleen Garcia	216	216:4-216:12	LP2
Colleen Garcia	216	216:21-217:10	LP2
Colleen Garcia	217	217:11-217:17	LP2
Colleen Garcia	223	223:12-224:3	LP2
Rep. Guillen	33	33:2-10	LP1
Rep. Guillen	33	33:2-20	LP1
Rep. Guillen	33	33:11-20	LP1
Rep. Guillen	149	149:2-150:7	LP1
Rep. Guillen	149	149:2-14	LP1
Rep. Guillen	150	150:8-11	LP1
Rep. Guillen	150	150:12-16	Grant, no objection made
Rep. Guillen	150	150:17-22	LP1
Rep. Guillen	150	150:17-19	LP1
Rep. Guillen	150	150:20-22	Grant, no objection made
Rep. Guillen	153	153:12-24	LP1
Rep. Guillen	154	154:13-155:5	LP1
Rep. Guillen	155	155:24-156:9	LP1
Rep. Guillen	155	155:24-156:8	LP1
Rep. Guillen	158	158:2-9	Grant, improper objection
Rep. Guillen	158	158:2-8	Grant, improper objection
Rep. Guillen	158	158:16-21	LP1

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Rep. Guillen	158	158:16-25	LP1
Rep. Guillen	159	159:25-160:12	LP1
Rep. Guillen	160	160:13-21	LP1
Rep. Guillen	160	160:13-161:6	LP1
Rep. Guillen	160	160:22-161:6	LP1
Rep. Guillen	161	161:7-13	LP1
Rep. Guillen	161	161:14-20	LP1
Rep. Guillen	162	162:20-163:17	LP1
Rep. Guillen	165	165:12-18	LP1
Rep. Guillen	166	166:2-11	LP1
Rep. Guillen	167	167:21-168:2	LP1
Rep. Guillen	169	169:20-25	LP1
Rep. Guillen	178	178:15-179:3	LP1
Rep. Guillen	181	181:2-7	LP1
Rep. Guillen	185	185:25-186:17	LP1
Rep. Guillen	188	188:13-189:3	LP1
Rep. Guillen	189	189:10-16	LP1
Rep. Guillen	195	195:12-24	LP1
Rep. Guillen	196	196:13-17	LP1
Rep. Guillen	197	197:21-199:4	LP1
Rep. Guillen	199	199:10-201:13	Deny 199:14-15, LP1, grant others LP4
Gober	135	135:5-13	LP2
Gober	137	137:7-24	LP2
Gober	153	153:10-24	LP2
Gober	206	206:10-22	LP2
Gober	207	207:8-208:6	LP2
Gober	208	208:22-209:6	LP2
Gober	209	209:17-23	LP2
Gober	212	212:20-213:5	LP2
Gober	245	245:18-246:6	LP2
Gober	262	262:2-8	LP2
Gober	264	264:17-265:9	LP2
Rep. Lozano	23	23:24-24:14	LP1
Rep. Lozano	26	26:1-26:7	LP1
Rep. Lozano	49	49:10-49:14	LP1
Rep. Lozano	50	50:11-50:17	LP1
Rep. Lozano	51	51:15-52:18	Grant 51:16-17, LP4, deny others LP1
Rep. Lozano	52	52:24-53:13	LP1
Rep. Lozano	59	59:14-60:4	LP1
Rep. Lozano	82	82:21-83:4	LP1
Rep. Lozano	89	89:21-90:7	LP1
Rep. Lozano	97	97:16-97:23	Grant, improper objection
Rep. Lozano	98	98:8-98:13	LP1
Rep. Lozano	98	98:18-99:3	LP1
Rep. Lozano	105	105:22-106:6	LP1
Rep. Lozano	107	107:13-108:21	LP1
Rep. Lozano	110	110:3-110:15	LP1
Rep. Lozano	116	116:21-117:1	Grant, improper objection
Rep. Lozano	118	118:12-119:11	LP1
Rep. Lozano	121	121:11-121:18	LP1
Rep. Jetton	32	32:1-16	Grant 32:1-2, LP4, deny others LP1
Rep. Jetton	41	41:4-17	LP1
Rep. Jetton	43	43:17-23	LP1
Rep. Jetton	52	52:25-53:4	LP1
Rep. Jetton	53	53:5-10	LP1
Rep. Jetton	53	53:20-54:17	LP1
Rep. Jetton	54	54:25-55:21	Grant 55:11-12, improper objection, deny others LP 1
Rep. Jetton	56	56:3-57:3	LP1
Rep. Jetton	57	57:24-58:1	Grant, no objection made
Rep. Jetton	60	60:21-61:2	LP1
Rep. Jetton	62	62:3-23	LP1

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Rep. Jetton	63	63:12-64:7	LP1
Rep. Jetton	69	69:10-21	LP1
Rep. Jetton	84	84:5-17	LP1
Rep. Jetton	152	152:1-6	LP1
Rep. Jetton	175	175:17-24	LP1
Rep. Jetton	177	177:19-178:4	LP1
Rep. Jetton	184	184:10-20	LP4
Rep. Jetton	206	206:12-25	LP1
Rep. Jetton	207	207:1-12	LP1
Rep. Jetton	207	207:18-208:18	LP1
Rep. Jetton	211	211:16-18	Grant, no objection made
Rep. Jetton	214	214:13-19	LP1
Rep. Jetton	215	215:11-18	LP1
Rep. Jetton	216	216:20-217:13	LP1
Rep. Jetton	218	218:1-10	LP1
Rep. Jetton	218	218:11-219:1	LP1
Rep. Jetton	222	222:8-25	LP1
Rep. Jetton	223	223:1-7	LP1
Rep. Jetton	223	223:8-224:21	LP1
Rep. Jetton	232	232:18-233:24	LP1
Rep. Buckley	27	27:1-27:23	LP4
Rep. Buckley	29	29:15-32:22	LP4
Rep. Buckley	43	43:25-44:23	LP4
Rep. Buckley	48	48:10-51:1	LP4
Rep. Buckley	55	55:3-55:11	Withdrawn
Anna Mackin	26	26:22-27:3	LP2
Anna Mackin	27	27:16-27:22	LP2
Anna Mackin	27	27:23-28:14	LP2
Anna Mackin	28	28:15-28:20	LP2
Anna Mackin	30	30:25-31:5	LP2
Anna Mackin	31	31:10-31:15	LP2
Anna Mackin	32	32:9-32:12	LP2
Anna Mackin	33	33:11-33:18	LP2
Anna Mackin	33	33:19-34:8	LP2
Anna Mackin	34	34:9-34:14	LP2
Anna Mackin	35	35:14-35:18	LP2
Anna Mackin	35	35:19-35:23	LP2
Anna Mackin	36	36:16-36:24	LP2
Anna Mackin	36	36:25-37:16	LP2
Anna Mackin	37	37:17-38:7	LP2
Anna Mackin	38	38:8-38:13	LP2
Anna Mackin	38	38:14-38:21	LP2
Anna Mackin	38	38:22-39:1	LP2
Anna Mackin	39	39:2-39:5	LP2
Anna Mackin	40	40:20-41:4	LP2
Anna Mackin	42	42:3-24:10	LP2
Anna Mackin	45	45:24-46:4	LP2
Anna Mackin	47	47:9-47:15	LP2
Anna Mackin	47	47:16-47:21	LP2
Anna Mackin	47	47:22-47:24	Grant, improper objection
Anna Mackin	48	48:9-48:20	LP2
Anna Mackin	48	48:21-49:6	LP2
Anna Mackin	49	49:25-50:7	LP2
Anna Mackin	50	50:8-50:14	LP2
Anna Mackin	51	51:13-51:21	LP2
Anna Mackin	52	52:11-52:15	LP2
Anna Mackin	53	53:17-53:24	LP2
Anna Mackin	54	54:25-55:6	LP2
Anna Mackin	55	55:25-56:8	LP2
Anna Mackin	58	58:17-58:23	LP2
Anna Mackin	58	58:25-59:9	LP2
Anna Mackin	59	59:10-59:18	LP2

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Anna Mackin	60	60:15-60:21	LP2
Anna Mackin	60	60:22-61:5	LP2
Anna Mackin	61	61:6-61:12	LP2
Anna Mackin	61	61:13-61:18	LP2
Anna Mackin	62	62:1-62:7	LP2
Anna Mackin	62	62:13-63:4	LP2
Anna Mackin	63	63:5-63:14	LP2
Anna Mackin	63	63:18-64:4	LP2
Anna Mackin	64	64:9-64:21	LP2
Anna Mackin	64	64:22-65:2	LP2
Anna Mackin	66	66:24-67:3	LP2
Anna Mackin	68	68:23-69:4	LP2
Anna Mackin	69	69:5-69:7	LP2
Anna Mackin	71	71:10-71:17	LP2
Anna Mackin	71	71:18-72:9	LP2
Anna Mackin	75	75:9-75:14	LP2
Anna Mackin	76	76:14-77:6	LP2
Anna Mackin	79	79:20-80:1	LP2
Anna Mackin	80	80:19-80:23	LP2
Anna Mackin	82	82:18-82:24	LP2
Anna Mackin	84	84:9-84:15	LP4
Anna Mackin	84	84:16-84:21	LP4
Anna Mackin	84	84:22-85:8	LP2
Anna Mackin	85	85:17-85:23	LP2
Anna Mackin	86	86:9-86:17	LP2
Anna Mackin	90	90:2-90:7	LP2
Anna Mackin	90	90:8-90:12	LP2
Anna Mackin	90	90:15-90:18	LP2
Anna Mackin	97	97:25-98:12	LP2
Anna Mackin	99	99:12-100:10	Grant, no objection made
Anna Mackin	100	100:11-100:20	LP2
Anna Mackin	100	100:21-101:2	LP2
Anna Mackin	102	102:6-102:14	LP2
Anna Mackin	103	103:15-103:21	LP2
Anna Mackin	103	103:22-104:13	LP2
Anna Mackin	104	104:24-105:6	LP2
Anna Mackin	105	105:7-105:17	LP2
Anna Mackin	106	106:22-107:8	LP4
Anna Mackin	107	107:20-108:1	LP2
Anna Mackin	112	112:6-112:14	LP2
Anna Mackin	112	112:15-113:1	LP2
Anna Mackin	113	113:2-113:6	LP2
Anna Mackin	113	113:7-113:12	LP2
Anna Mackin	113	113:13-113:17	LP2
Anna Mackin	113	113:20-114:3	LP2
Anna Mackin	114	114:4-114:7	LP2
Anna Mackin	114	114:8-114:12	LP2
Anna Mackin	114	114:13-114:15	LP2
Anna Mackin	114	114:16-114:18	LP2
Anna Mackin	114	114:19-114:23	LP2
Anna Mackin	115	115:8-115:19	LP2
Anna Mackin	115	115:20-116:8	LP2
Anna Mackin	116	116:9-116:16	LP2
Anna Mackin	116	116:21-117:5	Grant, improper objection
Anna Mackin	117	117:6-117:16	Grant, improper objection
Anna Mackin	120	120:1-120:9	LP4
Anna Mackin	120	120:10-120:14	LP4
Anna Mackin	121	121:4-121:10	LP4
Anna Mackin	121	121:11-121:15	LP4
Anna Mackin	122	122:2-122:15	LP4
Anna Mackin	122	122:16-122:21	LP4
Anna Mackin	122	122:22-123:4	LP4

Deponent	Starting Page Number	Line Number	Ruling
Anna Mackin	123	123:5-123:17	LP4
Anna Mackin	123	123:18-124:2	LP4
Anna Mackin	124	124:3-124:10	LP4
Anna Mackin	124	124:11-124:22	LP4
Anna Mackin	124	124:23-125:7	LP4
Anna Mackin	125	125:5-125:12	LP4
Anna Mackin	136	136:7-136:15	LP2
Anna Mackin	143	143:15-144:6	LP2
Anna Mackin	144	144:16-144:21	LP2
Anna Mackin	145	145:10-145:13	LP2
Anna Mackin	145	145:14-145:22	LP2
Anna Mackin	145	145:23-146:9	LP2
Anna Mackin	146	146:10-146:16	LP2
Anna Mackin	146	146:17-146:23	LP2
Anna Mackin	146	146:24-147:6	LP2
Anna Mackin	147	147:10-147:14	LP2
Anna Mackin	147	147:15-147:20	LP2
Anna Mackin	147	147:21-148:3	LP2
Anna Mackin	148	148:8-148:17	LP2
Anna Mackin	148	148:18149:1	LP2
Anna Mackin	149	149:2-149:14	LP2
Anna Mackin	149	149:15-149:19	LP2
Anna Mackin	149	149:22-149:15	LP2
Anna Mackin	150	150:1-150:5	LP2
Anna Mackin	150	150:6-150:12	LP2
Anna Mackin	150	150:13-150:17	LP2
Anna Mackin	150	150:18-151:4	LP2
Anna Mackin	151	151:5-151:6	Grant, improper objection
Anna Mackin	151	151:25-152:5	LP2
Anna Mackin	152	152:6-152:11	LP2
Anna Mackin	152	152:12-152:16	LP2
Anna Mackin	152	152:17-152:24	LP2
Anna Mackin	154	154:10-154:16	LP2
Anna Mackin	154	154:17-154:22	LP2
Anna Mackin	154	154:23-155:5	LP2
Anna Mackin	155	155:6-155:10	LP2
Anna Mackin	155	155:11-155:25	LP2
Anna Mackin	156	156:10-156:17	LP2
Anna Mackin	156	156:23-157:13	LP2
Anna Mackin	160	160:16-160:23	LP2
Anna Mackin	160	160:24-161:7	LP2
Anna Mackin	161	161:8-161:15	LP2
Anna Mackin	161	161:16-161:24	LP2
Anna Mackin	162	162:11-162:17	LP2
Anna Mackin	164	164:5-164:12	LP2
Anna Mackin	167	167:10-167:15	LP2
Anna Mackin	167	167:16-167:19	LP2
Anna Mackin	167	167:19-167:23	LP2
Anna Mackin	168	168:23-169:3	Grant, improper objection
Anna Mackin	169	169:4-169:7	LP2
Anna Mackin	170	170:12-170:21	LP2
Anna Mackin	171	171:24-172:4	LP2
Anna Mackin	172	172:5-172:10	LP2
Anna Mackin	172	172:11-172:17	LP2
Anna Mackin	172	172:18-173:3	LP2
Anna Makin	176	176:6-176:19	LP2
Anna Mackin	176	176:20-17624	Grant, improper objection
Anna Mackin	176	176:26-177:8	LP2
Anna Mackin	177	177:15-177:17	LP2
Anna Mackin	177	177:19-177:22	LP2
Anna Mackin	179	179:5-179:16	LP2
Anna Mackin	182	182:10-182:15	LP2

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Deponent	Starting Page Number	Line Number	Ruling
Anna Mackin	182	182:24-183:4	LP2
Anna Mackin	183	183:5-183:9	LP2
Anna Mackin	184	184:6-184:17	LP2
Anna Mackin	184	184:18-184:22	LP2
Anna Mackin	184	184:23-185:2	LP2
Anna Mackin	185	185:3-185:7	LP2
Anna Mackin	185	185:8-185:23	LP2
Anna Mackin	186	186:7-186:12	LP2
Anna Mackin	186	186:13-186:21	LP2
Anna Mackin	186	186:22-187:3	LP2
Anna Mackin	187	187:16-18720	LP2
Anna Mackin	187	187:21-188:10	LP2
Anna Mackin	188	188:11-188:17	LP2
Anna Mackin	188	188:18-189:6	LP2
Anna Mackin	189	189:7-189:15	LP2
Anna Mackin	190	190:3-190:8	LP2
Anna Mackin	191	191:3-191:14	LP2
Anna Mackin	191	191:25-192:4	LP2
Anna Mackin	193	193:19-193:23	LP2
Anna Mackin	194	194::22-195:3	LP2
Anna Mackin	195	195:10-195:19	LP2
Anna Mackin	195	195:20-195:25	LP2
Anna Mackin	196	196:1-196:7	LP2
Anna Mackin	196	196:8-16	LP2
Anna Mackin	196	196:22-197:2	LP2
Anna Mackin	197	197:10-197:18	LP2
Anna Mackin	198	198:9-198:14	LP2
Anna Mackin	198	198:15-198:22	LP2
Anna Mackin	200	200:9-200:13	LP2
Anna Mackin	200	200:14-200:20	LP2
Anna Mackin	201	201:3-201:22	LP2
Anna Mackin	202	202:23-203:2	LP2
Anna Mackin	203	203:9-204:2	LP2
Anna Mackin	205	205:12-205:19	LP2
Anna Mackin	206	206:22-207:9	LP2
Anna Mackin	213	213:9-213:19	LP2
Anna Mackin	213	213:25-214:4	LP2
Anna Mackin	229	229:2-229:14	LP2
Anna Mackin	230	230:2-230:9	LP2
Anna Mackin	230	230:17-230:25	LP2
Anna Mackin	231	231:1-231:7	LP2
Anna Mackin	231	231:8-231:14	LP2
Anna Mackin	231	231:15-232:1	LP2
Anna Mackin	235	235:16-236:5	LP2
Anna Mackin	238	238:4-238:12	LP2
Anna Mackin	239	239:9-239:16	LP2
Anna Mackin	242	242:10-242:22	LP2
Anna Mackin	244	244:12-244:18	LP2
Anna Mackin	245	245:7-245:22	LP2
Anna Mackin	246	246:14-247:2	LP2
Anna Mackin	247	247:3-247:6	Grant, improper objection
Anna Mackin	248	248:9-248:22	LP2
Anna Mackin	248	248:23-249:3	LP2
Anna Mackin	252	252:7-252:10	LP2
Anna Mackin	252	252:11-253:3	LP2
Anna Mackin	254	254:12-254:19	LP2
Anna Mackin	254	254:20-255:3	LP2
Anna Mackin	255	255:4-255:9	LP3
Anna Mackin	256	256:25-257:12	LP2
Anna Mackin	259	259:19-260:11	LP2
Anna Mackin	260	260:11-260:16	LP2
Anna Mackin	261	261:25-262:5	LP2

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Deponent	Starting Page Number	Line Number	Ruling
Anna Mackin	263	263:1-263:5	LP2
Anna Mackin	262	262:25-263:11	LP4
Anna Mackin	264	264:9-264:14	LP2
Anna Mackin	264	264:15-265:2	LP2
Anna Mackin	264	264:3-264:10	LP2
Anna Mackin	265	265:11-265:18	LP2
Anna Mackin	266	266:7-266:15	LP2
Anna Mackin	266	266:16-266:21	LP2
Anna Mackin	266	266:22-267:8	LP2
Anna Mackin	267	267:22-268:13	LP2
Anna Mackin	268	268:14-268:23	LP2
Anna Mackin	268	268:24-269:8	LP2
Rep. Landgraf	18	18:18-19:7	LP1
Rep. Landgraf	20	20:3-20:4	Grant, no objection made
Rep. Landgraf	44	44:19-45:5	LP1
Rep. Landgraf	46	46:17-47:8	LP1
Rep. Landgraf	49	49:10-21	LP1
Rep. Landgraf	58	58:25-58:20	LP1
Rep. Landgraf	60	60:3-14	LP1
Rep. Landgraf	69	69:3-69:18	Grant, improper objection
Rep. Landgraf	69	69:25-70:9	LP1
Rep. Landgraf	70	70:16-70:21	LP1
Rep. Landgraf	73	73:19-74:13	Grant, improper objection
Rep. Landgraf	104	104:21-105:8	LP1
Rep. Landgraf	114	114:23-116:8	LP1
Rep. Landgraf	118	118:9-119:4	LP1
Rep. Landgraf	119	119:5-21	LP1
Rep. Landgraf	119	119:22-120:24	LP1
Rep. Landgraf	143	143:16-144:5	LP1
Rep. Landgraf	144	144:6-145:5	LP1
Rep. Landgraf	156	156:3-157:16	LP1
Rep. Landgraf	159	159:3-159:21	LP1
Rep. Landgraf	177	177:20-178:6	LP1
Rep. Landgraf	178	178:7-179:3	LP1
Rep. Landgraf	179	179:4-179:23	LP1
Rep. Landgraf	179	179:24-180:16	LP1
Rep. Landgraf	181	181:22-182:6	LP1
Rep. Landgraf	184	184:17-184:25	LP1
Rep. Landgraf	186	186:8-187:8	LP1
Rep. Landgraf	188	188:24-190:15	LP1
Rep. Landgraf	190	190:18-191:3	LP1
Rep. Landgraf	191	191:13-192:3	LP1
Rep. Landgraf	192	192:13-193:6	LP1
Rep. Landgraf	193	193:13-194:11	LP1
Rep. Landgraf	195	195:21-196:18	Grant 196:7-8, improper objection, deny others LP1
Rep. Landgraf	246	246:21-247:3	LP1
Rep. Landgraf	264	264:6-265:15	LP1
Rep. Landgraf	271	271:11-273:5	Grant, improper objection
Rep. Landgraf	277	277:6-278:4	LP1
Rep. Landgraf	283	283:17-284:9	LP1
Rep. Landgraf	284	284:10-284:25	LP1
Rep. Hunter	21	21:14-20	LP1
Rep. Hunter	21	21:23-23:2	LP1
Rep. Hunter	28	28:13-20	LP1
Rep. Hunter	28	28:23-29:11	LP1
Rep. Hunter	29	29:12-30:5	LP1
Rep. Hunter	54	54:22-56:3	LP1
Rep. Hunter	59	59:13-61:5	LP1
Rep. Hunter	59	59:13-63:5	Grant, 62:23-24 improper objection, deny others LP1
Rep. Hunter	62	62:25-63:18	LP1

Deponent	Starting Page Number	Line Number	Ruling
Rep. Hunter	64	64:1-67:7	LP1
Rep. Hunter	68	68:3-69:6	LP1
Rep. Hunter	79	79:10-81:25	LP1
Rep. Hunter	82	82:1-15	LP1
Rep. Hunter	82	82:16-83:7	LP1
Rep. Hunter	83	83:8-25	LP1
Rep. Hunter	85	85:9-86:21	LP1
Rep. Hunter	86	86:7-12	LP1
Rep. Hunter	104	104:20-106:24	LP1
Rep. Hunter	121	121:4-122:4	LP1
Rep. Hunter	124	124:3-10	LP1
Rep. Hunter	134	134:21-135:11	LP1
Rep. Hunter	136	136:22-137:24	LP1
Rep. Hunter	136	136:23-139:21	LP1
Rep. Hunter	141	141:3-15	LP4
Rep. Hunter	141	141:20-142:11	LP4
Rep. Hunter	142	142:25-143:12	LP1
Rep. Hunter	145	145:8-17	LP1
Rep. Hunter	146	146:2-9	LP1
Rep. Hunter	149	149:14-150:19	Grant, improper objection
Rep. Hunter	174	174:1-8	LP1
Rep. Hunter	176	176:11-14	Grant, improper objection
Rep. Hunter	186	186:10-15	LP1
Rep. Hunter	228	228:10-229:1	LP1
Rep. Hunter	245	245:6-15	Grant, improper objection
Sean Opperman	161	161:16-163:01	LP2
Sean Opperman	172	172:11-172:22	LP2
Sean Opperman	191	191:18-197:12	Grant, 191:24-25, improper objection, deny others LP4
Sean Opperman	208	208:20-209:09	LP4
Sean Opperman	209	209:10-209:24	LP2
Sean Opperman	209	209:10-209:24	LP2
Sean Opperman	210	210:16-211:17	LP2
Sean Opperman	211	211:22-212:02	LP2
Sean Opperman	212	212:13-212:19	LP2
Sean Opperman	218	218:21-219:10	LP2
Sean Opperman	225	225:08-225:19	LP2
Sean Opperman	226	226:06-226:12	LP2
Sean Opperman	226	226:13-226:24	LP2
Sean Opperman	227	227:25-229:07	LP2
Sean Opperman	231	231:08-231:12	LP2
Sean Opperman	236	236:09-236:17	LP2
Sean Opperman	236	236:23-237:05	LP2
Sean Opperman	259	259:04-260:04	LP2
Sean Opperman	301	301:21-302:15	LP2
Sean Opperman	313	313:14-315:21	LP2
Sean Opperman	315	315:22-317:20	LP2
Sean Opperman	317	317:21-318:21	LP2
Sean Opperman	318	318:22-321:14	LP2
Adam Foltz	32	32:17-33:23	LP2
Adam Foltz	32	32:17-35:8	LP2
Adam Foltz	34	34:7-35:25	LP2
Adam Foltz	35	35:3-36:9	LP2
Adam Foltz	77	77:15-78:17	LP2
Adam Foltz	78	78:4-17	Grant, no objection made
Adam Foltz	80	80:18-82:5	LP2
Adam Foltz	83	83:3-18	LP2
Adam Foltz	104	104:20-105:19	LP2
Adam Foltz	105	105:23-108:23	LP2
Adam Foltz	124	124:25-125:10	LP2
Adam Foltz	125	125:21-126:16	LP2
Adam Foltz	126	126:22-127:3	LP4

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Deponent	Starting Page Number	Line Number	Ruling
Adam Foltz	130	130:6-13	LP2
Adam Foltz	135	135:13-20	LP2
Adam Foltz	140	140:6-13	LP2
Adam Foltz	140	140:20-141:4	LP2
Adam Foltz	142	142:14-17	LP2
Adam Foltz	149	149:4-10	LP2
Adam Foltz	155	155:16-156:4	LP4
Adam Foltz	170	170:18-171:8	LP2
Adam Foltz	174	174:12-17	LP2
Adam Foltz	177	177:15-178:4	LP2
Adam Foltz	179	179:4-180:3	LP2
Adam Foltz	181	181:5-10	LP2
Adam Foltz	185	185:24-186:5	LP2
Adam Foltz	186	186:6-20	LP2
Adam Foltz	186	186:21-187:14	LP2
Adam Foltz	197	197:5-14	LP2
Adam Foltz	197	197:15-23	LP2
Adam Foltz	219	219:19-23	LP2
Adam Foltz	232	232:3-15	LP2
Adam Foltz	232	232:16-23	LP2
Adam Foltz	232	232:24-233:3	LP2
Adam Foltz	233	233:4-11	LP2
Adam Foltz	233	233:12-17	LP2
Adam Foltz	233	233:18-22	LP2
Adam Foltz	233	233:23-234:4	LP2
Adam Foltz	241	241:21-242:8	LP2
Adam Foltz	252	252:15-253:11	LP2
Adam Foltz	254	254:13-20	LP2
Adam Foltz	255	255:12-18	LP2
Adam Foltz	267	267:4-8	LP2
Adam Foltz	267	267:9-13	LP2
Adam Foltz	267	267:14-23	LP2
Adam Foltz	268	268:6-13	LP2
Adam Foltz	287	287:7-24	LP2

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Deponent	Starting Page Number	Line Number	RULING
Adam Foltz	92	92:2-93:17	DENY. LP2.
Adam Foltz	92	92:2-10	DENY. LP2.
Adam Foltz	92	92:11-18	DENY. LP2.
Adam Foltz	93	93:12-17	DENY. LP2.
Adam Foltz	94	94:16-21	DENY. LP2.
Adam Foltz	94	94:16-95:9	DENY. LP2.
Adam Foltz	94	94:22-95:4	DENY. LP2.
Adam Foltz	94	94:16-21	DENY. LP2.
Adam Foltz	94	94:16-95:9	DENY. LP2.
Adam Foltz	94	94:22-95:4	DENY. LP2.
Adam Foltz	95	95:5-9	DENY. LP2.
Adam Foltz	99	99:22-100:5	DENY. LP2.
Adam Foltz	99	99:22-101:4	DENY. LP2.
Adam Foltz	100	100:6-102:14	DENY. LP2.
Adam Foltz	100	100:6-14	DENY. LP2.
Adam Foltz	100	100:15-21	DENY. LP2.
Adam Foltz	100	100:22-101:4	DENY. LP2.
Adam Foltz	101	101:5-13	DENY. LP2.
Adam Foltz	101	101:5-24	DENY. LP2.
Adam Foltz	101	101:14-24	DENY. LP2.
Adam Foltz	101	101:5-13	DENY. LP2.
Adam Foltz	101	101:5-24	DENY. LP2.
Adam Foltz	101	101:14-24	DENY. LP2.
Adam Foltz	102	8:14	DENY. LP2.
Adam Foltz	104	104:20-105:5	DENY. LP2.
Adam Foltz	105	105:6-19	DENY. LP2.
Adam Foltz	107	107:15-22	DENY. LP2.
Adam Foltz	107	107:23-108:9	DENY. LP2.
Adam Foltz	109	109:18-24	DENY. LP2.
Adam Foltz	109	109:25-110:4	DENY. LP2.
Adam Foltz	110	110:5-10	DENY. LP2.
Adam Foltz	110	110:11-16	DENY. LP2.
Adam Foltz	110	110:17-23	DENY. LP2.
Adam Foltz	110	110:24-111:6	DENY. LP2.
Adam Foltz	110	110:5-10	DENY. LP2.
Adam Foltz	110	110:11-16	DENY. LP2.
Adam Foltz	110	110:17-23	DENY. LP2.
Adam Foltz	111	111:7-12	DENY. LP2.
Adam Foltz	112	112:9-20	DENY. LP2.
Adam Foltz	112	112:21-23	DENY. LP2.
Adam Foltz	112	112:3-8	DENY. LP2.
Adam Foltz	112	112:9-20	DENY. LP2.
Adam Foltz	112	112:21-23	DENY. LP2.
Adam Foltz	113	113:8-12	DENY. LP2.
Adam Foltz	113	113:13-23	DENY. LP2.
Adam Foltz	113	113:24-114:7	DENY. LP2.
Adam Foltz	116	116:8-18	DENY. LP2.
Adam Foltz	117	117:15-118:4	DENY. LP2.
Adam Foltz	118	118:14-18	DENY. LP2.
Adam Foltz	120	120:2-12	DENY. LP2.
Adam Foltz	120	120:18-22	DENY. LP2.
Adam Foltz	120	120:2-12	DENY. LP2.
Adam Foltz	120	120:18-22	DENY. LP2.
Adam Foltz	121	121:12-122:14	DENY. LP2.
Adam Foltz	126	126:17-21	DENY. LP2.
Adam Foltz	128	128:2-9	DENY. LP2.
Adam Foltz	129	129:11-24	DENY. LP2.
Adam Foltz	129	129:11-130:13	DENY. LP2.
Adam Foltz	131	131:5-132:2	DENY. LP2.
Adam Foltz	132	132:3-14	DENY. LP2.
Adam Foltz	134	134:15-23	DENY. LP2.

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Deponent	Starting Page Number	Line Number	RULING
Adam Foltz	134	134:8-14	DENY. LP2.
Adam Foltz	135	135:13-20	DENY. LP2.
Adam Foltz	135	135:21-136:3	DENY. LP2.
Adam Foltz	137	137:8-17	DENY. LP2.
Adam Foltz	138	138:25-139:10	DENY. LP2.
Adam Foltz	138	138:7-20	DENY. LP2.
Adam Foltz	140	140:6-13	DENY. LP2.
Adam Foltz	140	140:20-141:4	DENY. LP2.
Adam Foltz	141	141:5-142:5	DENY. LP2.
Adam Foltz	142	142:14-17	DENY. LP2.
Adam Foltz	142	142:24-143:6	DENY. LP2.
Adam Foltz	142	142:6-13	DENY. LP2.
Adam Foltz	143	143:10-17	DENY. LP2.
Adam Foltz	143	143:18-22	DENY. LP2.
Adam Foltz	144	144:3-8	DENY. LP2.
Adam Foltz	144	144:20-145:1	DENY. LP2.
Adam Foltz	145	145:15-146:1	DENY. LP2.
Adam Foltz	145	145:8-14	DENY. LP2.
Adam Foltz	145	145:15-146:1	DENY. LP2.
Adam Foltz	148	148:5-16	DENY. LP2.
Adam Foltz	148	148:17-149:3	DENY. LP2.
Adam Foltz	151	151:8-18	DENY. LP2.
Adam Foltz	155	155:16-156:4	DENY. LP2.
Adam Foltz	174	174:7-11	DENY. LP2.
Adam Foltz	178	178:5-179:3	DENY. LP2.
Adam Foltz	181	181:5-10	DENY. LP2.
Adam Foltz	183	183:14-19	DENY. LP2.
Adam Foltz	184	184:2-15	DENY. LP2.
Adam Foltz	185	185:23-23	GRANT. Improper objection.
Adam Foltz	187	187:15-188:17	DENY. LP2.
Adam Foltz	188	188:3-17	DENY. LP2.
Adam Foltz	188	188:25-189:20	DENY. LP2.
Adam Foltz	190	190:23-191:3	DENY. LP2.
Adam Foltz	191	191:4-10	DENY. LP2.
Adam Foltz	194	194:8-12	DENY. LP2.
Adam Foltz	195	195:17-22	DENY. LP2.
Adam Foltz	195	195:17-196:8	DENY. LP2.
Adam Foltz	195	195:23-196:8	DENY. LP2.
Adam Foltz	195	195:3-9	DENY. LP2.
Adam Foltz	195	195:10-16	DENY. LP2.
Adam Foltz	195	195:17-22	DENY. LP2.
Adam Foltz	195	195:17-196:8	DENY. LP2.
Adam Foltz	195	195:23-196:8	DENY. LP2.
Adam Foltz	197	197:15-23	DENY. LP2.
Adam Foltz	197	197:24-198:20	DENY. LP2.
Adam Foltz	197	197:24-199:22	DENY. LP2.
Adam Foltz	197	197:15-23	DENY. LP2.
Adam Foltz	198	198:21-199:6	DENY. LP2.
Adam Foltz	199	199:16-22	DENY. LP2.
Adam Foltz	199	199:16-200:17	DENY. LP2.
Adam Foltz	199	199:23-200:7	DENY. LP2.
Adam Foltz	199	199:23-200:17	DENY. LP2.
Adam Foltz	199	199:7-15	DENY. LP2.
Adam Foltz	199	199:16-200:17	DENY. LP2.
Adam Foltz	199	199:23-200:17	DENY. LP2.
Adam Foltz	199	199:16-22	DENY. LP2.
Adam Foltz	199	199:23-200:7	DENY. LP2.
Adam Foltz	200	200:8-17	DENY. LP2.
Adam Foltz	200	200:18-24	DENY. LP2.
Adam Foltz	202	202:8-203:22	DENY. LP2.

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Deponent	Starting Page Number	Line Number	RULING
Adam Foltz	203	203:23-204:7	DENY. LP2.
Adam Foltz	204	204:8-16	DENY. LP2.
Adam Foltz	204	204:17-21	DENY. LP2.
Adam Foltz	204	204:22-205:6	DENY. LP2.
Adam Foltz	205	205:7-12	DENY. LP2.
Adam Foltz	206	206:17-207:2	DENY. LP2.
Adam Foltz	207	207:19-208:8	DENY. LP2.
Adam Foltz	208	208:9-18	DENY. LP2.
Adam Foltz	208	208:9-209:2	DENY. LP2.
Adam Foltz	208	208:19-209:2	DENY. LP2.
Adam Foltz	209	209:11-25	DENY. LP2.
Adam Foltz	213	213:7-16	DENY. LP2.
Adam Foltz	213	213:17-23	DENY. LP2.
Adam Foltz	214	214:9-23	DENY. LP2.
Adam Foltz	219	219:24-220:6	DENY. LP2.
Adam Foltz	220	220:25-221:9	DENY. LP2.
Adam Foltz	221	221:13-222:5	DENY. LP2.
Adam Foltz	221	221:23-222:5	DENY. LP2.
Adam Foltz	223	223:6-21	DENY. LP2.
Adam Foltz	226	226:14-20	DENY. LP2.
Adam Foltz	226	226:21-227:1	DENY. LP2.
Adam Foltz	226	226:14-20	DENY. LP2.
Adam Foltz	226	226:21-227:1	DENY. LP2.
Adam Foltz	230	230:21-231:8	DENY. LP2.
Adam Foltz	235	235:2-7	DENY. LP2.
Adam Foltz	238	238:13-239:24	DENY. LP2.
Adam Foltz	239	239:25-240:6	DENY. LP2.
Adam Foltz	240	240:7-12	DENY. LP2.
Adam Foltz	243	243:22-244:6	DENY. LP2.
Adam Foltz	244	244:7-14	~~DENY IN PART, GRANT IN PART. LP2.~~ **Legislative privilege does not apply to the extent the answer provides public information, see LP3.**
Adam Foltz	244	244:15-19	~~DENY IN PART, GRANT IN PART. LP2.~~ **Legislative privilege does not apply to the extent the answer provides public information, see LP3.**
Adam Foltz	244	244:7-14	~~DENY IN PART, GRANT IN PART. LP2.~~ **Legislative privilege does not apply to the extent the answer provides public information, see LP3.**
Adam Foltz	246	246:4-20	DENY. LP2.
Adam Foltz	246	246:21-247:7	DENY. LP2.
Adam Foltz	246	246:4-20	DENY. LP2.
Adam Foltz	247	247:8-21	DENY. LP2.
Adam Foltz	247	247:22-248:5	DENY. LP2.
Adam Foltz	248	248:22-249:11	DENY. LP2.
Adam Foltz	249	249:21-250:12	DENY. LP2.
Adam Foltz	251	251:19-252:1	DENY. LP2.
Adam Foltz	254	254:21-255:11	DENY. LP2.
Adam Foltz	256	256:23-257:9	DENY. LP2.
Adam Foltz	257	257:10-16	DENY. LP2.
Adam Foltz	257	257:17-258:2	DENY. LP2.
Adam Foltz	261	261:1-5	DENY. LP2.
Adam Foltz	261	261:6-11	DENY. LP2.
Adam Foltz	261	261:12-20	DENY. LP2.
Adam Foltz	261	261:1-5	DENY. LP2.
Adam Foltz	262	262:8-14	DENY. LP2.
Adam Foltz	262	262:15-20	DENY. LP2.
Adam Foltz	271	271:8-17	DENY. LP2.

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Deponent	Starting Page Number	Line Number	RULING
Adam Foltz	280	280:25-282:7	DENY. LP2.
Adam Foltz	281	281:12-282:7	DENY. LP2.
Adam Foltz	285	285:15-286:2	DENY. LP2.
Adam Foltz	286	286:15-21	DENY. LP2.
Adam Foltz	286	286:22-287:2	DENY. LP2.
Adam Foltz	289	289:16-23	DENY. LP2.
Anna Mackin	30	30:20-30:24	DENY. LP2.
Anna Mackin	31	31:10-31:15	DENY. LP2.
Anna Mackin	32	32:23-33:3	DENY. LP2.
Anna Mackin	34	34:9-34:14	DENY. LP2.
Anna Mackin	34	34:20-34:25	DENY. LP2.
Anna Mackin	35	35:1-35:7	DENY. LP2.
Anna Mackin	35	35:19-35:23	DENY. LP2.
Anna Mackin	35	35:8-35:13	DENY. LP2.
Anna Mackin	35	35:14-35:18	DENY. LP2.
Anna Mackin	36	36:9-36:15	DENY. LP2.
Anna Mackin	36	36:25-37:16	DENY. LP2.
Anna Mackin	37	37:17-38:7	DENY. LP2.
Anna Mackin	39	39:6-39:21	DENY. LP2.
Anna Mackin	39	39:22-40:9	DENY. LP2.
Anna Mackin	40	40:10-40:19	DENY. LP2.
Anna Mackin	41	41:13-41:18	DENY. LP2.
Anna Mackin	41	41:19-42:2	DENY. LP2.
Anna Mackin	42	42:11-42:22	DENY. LP2.
Anna Mackin	42	42:23-43:9	DENY. LP2.
Anna Mackin	43	43:10-43:16	DENY. LP2.
Anna Mackin	43	43:20-44:3	DENY. LP2.
Anna Mackin	44	44:4-44:10	DENY. LP2.
Anna Mackin	44	44:11-45:1	DENY. LP2.
Anna Mackin	45	45:7-45:18	DENY. LP2.
Anna Mackin	45	45:19-45:23	DENY. LP2.
Anna Mackin	45	45:2-45:6	DENY. LP2.
Anna Mackin	46	46:5-46:13	DENY. LP2.
Anna Mackin	47	47:16-47:21	DENY. LP2.
Anna Mackin	47	47:25-48:8	DENY. LP2.
Anna Mackin	47	47:22-47:24	DENY. LP2.
Anna Mackin	48	48:9-48:20	DENY. LP2.
Anna Mackin	48	48:21-49:6	DENY. LP2.
Anna Mackin	49	49:7-49:14	DENY. LP2.
Anna Mackin	50	50:8-50:14	DENY. LP2.
Anna Mackin	51	51:13-51:21	DENY. LP2.
Anna Mackin	52	52:16-52:21	DENY. LP2.
Anna Mackin	54	54:2-54:9	DENY. LP2.
Anna Mackin	54	54:10-54:16	DENY. LP2.
Anna Mackin	55	55:12-55:24	DENY. LP2.
Anna Mackin	56	56:9-56:14	DENY. LP2.
Anna Mackin	56	56:15-56:21	DENY. LP2.
Anna Mackin	57	57:7-58:16	DENY. LP2.
Anna Mackin	58	58:17-58:23	DENY. LP2.
Anna Mackin	58	58:25-59:9	DENY. LP2.
Anna Mackin	59	59:19-60:14	DENY. LP2.
Anna Mackin	60	60:15-60:21	DENY. LP2.
Anna Mackin	61	61:6-61:12	DENY. LP2.
Anna Mackin	61	61:13-61:18	DENY. LP2.
Anna Mackin	62	62:1-62:7	DENY. LP2.
Anna Mackin	66	66:24-67:3	DENY. LP2.
Anna Mackin	66	66:15-66:23	DENY. LP2.
Anna Mackin	68	68:23-69:4	DENY. LP2.
Anna Mackin	69	69:23-70:10	DENY. LP2.
Anna Mackin	70	70:11-71:9	DENY. LP2.

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Deponent	Starting Page Number	Line Number	RULING
Anna Mackin	71	71:10-71:17	DENY. LP2.
Anna Mackin	72	72:10-72:19	DENY. LP2.
Anna Mackin	72	72:20-73:9	DENY. LP2.
Anna Mackin	73	73:10-73:18	DENY. LP2.
Anna Mackin	74	74:20-75:2	DENY. LP2.
Anna Mackin	74	74:3-74:15	DENY. LP2.
Anna Mackin	74	74:16-74:19	DENY. LP2.
Anna Mackin	75	75:3-75:8	DENY. LP2.
Anna Mackin	76	76:3-76:7	DENY. LP2.
Anna Mackin	76	76:8-76:13	DENY. LP2.
Anna Mackin	76	76:14-77:6	DENY. LP2.
Anna Mackin	77	77:12-78:4	DENY. LP2.
Anna Mackin	78	78:5-78:13	DENY. LP2.
Anna Mackin	79	79:20-80:1	DENY. LP2.
Anna Mackin	80	80:2-80:8	DENY. LP2.
Anna Mackin	80	80:19-80:23	DENY. LP2.
Anna Mackin	82	82:18-82:24	DENY. LP2.
Anna Mackin	83	83:13-83:22	DENY. LP2.
Anna Mackin	83	83:5-83:9	DENY. LP2.
Anna Mackin	84	84:9-84:15	DENY. LP2.
Anna Mackin	84	84:16-84:21	DENY. LP2.
Anna Mackin	84	84:22-85:8	DENY. LP2.
Anna Mackin	85	85:9-85:16	DENY. LP2.
Anna Mackin	86	86:9-86:17	DENY. LP2.
Anna Mackin	89	89:5-89:16	DENY IN PART, GRANT IN PART. LP2. Legislative privilege does not apply to the extent the answer provides public information, see LP3.
Anna Mackin	90	90:15-90:18	privilege does not apply to the extent the question asks about Mackin's personal beliefs outside of her capacity as a non-legislator not acting in the sphere of legitimate legislative activity at the direction of, instruction of, or for a legislator.
Anna Mackin	94	94:15-95:5	DENY. LP2.
Anna Mackin	95	95:6-95:12	DENY. LP2.
Anna Mackin	95	95:19-96:2	DENY. LP2.
Anna Mackin	96	96:21-97:3	DENY. LP2.
Anna Mackin	96	96:11-96:20	DENY. LP2.
Anna Mackin	97	97:4-97:10	DENY. LP2.
Anna Mackin	97	97:11-97:24	DENY. LP2.
Anna Mackin	97	97:25-98:12	DENY. LP2.
Anna Mackin	98	98:13-99:6	DENY. LP2.
Anna Mackin	99	99:12-100:10	DENY. LP2.
Anna Mackin	101	101:3-101:15	DENY. LP2.
Anna Mackin	101	101:23-102:5	DENY. LP2.
Anna Mackin	102	102:6-102:13	DENY. LP2.
Anna Mackin	103	103:15-203:21	DENY. LP2.
Anna Mackin	103	103:22-104:13	DENY. LP2.
Anna Mackin	104	104:14-104:19	DENY. LP2.
Anna Mackin	104	104:24-105:6	DENY. LP2.
Anna Mackin	105	105:7-105:17	DENY. LP2.
Anna Mackin	105	105:18-106:1	DENY. LP2.
Anna Mackin	106	106:22-107:8	DENY. LP2.
Anna Mackin	106	106:2-106:14	DENY. LP2.
Anna Mackin	107	107:20-108:1	DENY. LP2.
Anna Mackin	108	108:11-108:18	DENY. LP2.
Anna Mackin	109	109:22-110:4	DENY. LP2.
Anna Mackin	110	110:5-111:3	DENY. LP2.
Anna Mackin	111	111:4-111:9	DENY. LP2.
Anna Mackin	111	111:10-111:21	DENY. LP2.

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Deponent	Starting Page Number	Line Number	RULING
Anna Mackin	111	111:22-112:3	GRANT. Untimely assertion of legislative privilege. See ECF No. 282 at 4.
Anna Mackin	112	112:6-112:14	DENY. LP2.
Anna Mackin	112	112:15-113:1	DENY. LP2.
Anna Mackin	113	113:2-113:6	DENY. LP2.
Anna Mackin	113	113:7-113:12	DENY. LP2.
Anna Mackin	113	113:13-113:17	DENY. LP2.
Anna Mackin	114	114:4-114:7	DENY. LP2.
Anna Mackin	114	114:8-114:12	DENY. LP2.
Anna Mackin	114	114:16-114:18	DENY. LP2.
Anna Mackin	114	114:19-114:23	DENY. LP2.
Anna Mackin	116	116:9-116:16	DENY. LP2.
Anna Mackin	118	118:5-118:17	DENY. LP2.
Anna Mackin	120	120:1-120:9	privilege does not apply to the extent the question asks about Mackin's personal beliefs outside of her capacity as a non-legislator not acting in the sphere of legitimate legislative activity at the direction of, instruction of, or for a legislator.
Anna Mackin	120	120:10-120:14	privilege does not apply to the extent the question asks about Mackin's personal beliefs outside of her capacity as a non-legislator not acting in the sphere of legitimate legislative activity at the direction of, instruction of, or for a legislator.
Anna Mackin	122	122:2-122:15	privilege does not apply to the extent the question asks about Mackin's personal beliefs outside of her capacity as a non-legislator not acting in the sphere of legitimate legislative activity at the direction of, instruction of, or for a legislator.
Anna Mackin	122	122:16-122:21	privilege does not apply to the extent the question asks about Mackin's personal beliefs outside of her capacity as a non-legislator not acting in the sphere of legitimate legislative activity at the direction of, instruction of, or for a legislator.
Anna Mackin	122	122:22-123:4	privilege does not apply to the extent the question asks about Mackin's personal beliefs outside of her capacity as a non-legislator not acting in the sphere of legitimate legislative activity at the direction of, instruction of, or for a legislator.
Anna Mackin	123	123:18-124:2	privilege does not apply to the extent the question asks about Mackin's personal beliefs outside of her capacity as a non-legislator not acting in the sphere of legitimate legislative activity at the direction of, instruction of, or for a legislator.
Anna Mackin	123	123:5-123:17	privilege does not apply to the extent the question asks about Mackin's personal beliefs outside of her capacity as a non-legislator not acting in the sphere of legitimate legislative activity at the direction of, instruction of, or for a legislator.
Anna Mackin	124	124:3-124:10	privilege does not apply to the extent the question asks about Mackin's personal beliefs outside of her capacity as a non-legislator not acting in the sphere of legitimate legislative activity at the direction of, instruction of, or for a legislator.

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Anna Mackin	124	124:11-124:22	privilege does not apply to the extent the question asks about Mackin's personal beliefs outside of her capacity as a non-legislator not acting in the sphere of legitimate legislative activity at the direction of, instruction of, or for a legislator.
Anna Mackin	124	124:23-125:7	privilege does not apply to the extent the question asks about Mackin's personal beliefs outside of her capacity as a non-legislator not acting in the sphere of legitimate legislative activity at the direction of, instruction of, or for a legislator.
Anna Mackin	125	125:5-125:12	privilege does not apply to the extent the question asks about Mackin's personal beliefs outside of her capacity as a non-legislator not acting in the sphere of legitimate legislative activity at the direction of, instruction of, or for a legislator.
Anna Mackin	143	143:15-144:6	DENY. LP2.
Anna Mackin	144	144:16-144:21	DENY. LP2.
Anna Mackin	145	145:23-146:9	DENY. LP2.
Anna Mackin	145	145:10-145:13	DENY. LP2.
Anna Mackin	145	145:14-145:22	DENY. LP2.
Anna Mackin	146	146:10-146:16	DENY. LP2.
Anna Mackin	146	146:17-146:23	DENY. LP2.
Anna Mackin	146	146:24-147:6	DENY. LP2.
Anna Mackin	147	147:10-147:14	DENY. LP2.
Anna Mackin	147	147:15-147:20	DENY. LP2.
Anna Mackin	147	147:21-148:3	DENY. LP2.
Anna Mackin	148	148:18-149:1	DENY. LP2.
Anna Mackin	148	148:8-148:17	DENY. LP2.
Anna Mackin	149	149:2-14	DENY. LP2.
Anna Mackin	149	149:15-149:19	DENY. LP2.
Anna Mackin	149	149:22-149:15	DENY. LP2.
Anna Mackin	150	150:13-150:17	DENY. LP2.
Anna Mackin	150	150:1-150:5	DENY. LP2.
Anna Mackin	150	150:6-150:12	DENY. LP2.
Anna Mackin	150	150:18-151:4	DENY. LP2.
Anna Mackin	151	151:5-151:6	DENY. LP2.
Anna Mackin	151	151:25-152:5	DENY. LP2.
Anna Mackin	152	152:6-152:11	DENY. LP2.
Anna Mackin	152	152:12-152:16	DENY. LP2.
Anna Mackin	152	152:17-152:24	DENY. LP2.
Anna Mackin	154	154:10-154:16	DENY. LP2.
Anna Mackin	154	154:17-154:22	DENY. LP2.
Anna Mackin	154	154:23-155:5	DENY. LP2.
Anna Mackin	155	155:6-155:10	DENY. LP2.
Anna Mackin	155	155:11-155:25	DENY. LP2.
Anna Mackin	156	156:10-156:17	DENY. LP2.
Anna Mackin	156	156:23-157:13	DENY. LP2.
Anna Mackin	160	160:16-160:23	DENY. LP2.
Anna Mackin	160	160:24-161:7	DENY. LP2.
Anna Mackin	161	161:16-161:24	DENY. LP2.
Anna Mackin	161	161:8-161:15	DENY. LP2.
Anna Mackin	162	162:9-162:24	DENY. LP2.
Anna Mackin	162	162:11-162:17	DENY. LP2.
Anna Mackin	163	163:18-164:4	DENY. LP2.
Anna Mackin	164	164:13-164:19	DENY. LP2.
Anna Mackin	164	164:5-164:12	DENY. LP2.
Anna Mackin	165	165:9-165:19	DENY. LP2.
Anna Mackin	166	166:6-166:18	DENY. LP2.

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Anna Mackin	167	167:16-167:19	DENY. LP2.
Anna Mackin	167	167:19-167:23	DENY. LP2.
Anna Mackin	167	167:24-168:1	DENY. LP2.
Anna Mackin	167	167:10-167:15	DENY. LP2.
Anna Mackin	168	168:14-168:22	DENY. LP2.
Anna Mackin	168	168:23-169:3	DENY. LP2.
Anna Mackin	168	168:2-13	DENY. LP2.
Anna Mackin	169	169:25-170:11	DENY. LP2.
Anna Mackin	169	169:4-169:7	DENY. LP2.
Anna Mackin	171	171:24-172:4	DENY. LP2.
Anna Mackin	172	172:11-172:17	DENY. LP2.
Anna Mackin	172	172:18-173:3	DENY. LP2.
Anna Mackin	172	172:5-172:10	DENY. LP2.
Anna Mackin	173	173:6-173:18	DENY. LP2.
Anna Mackin	173	173:19-173:21	DENY. LP2.
Anna Mackin	173	173:22-173:25	DENY. LP2.
Anna Mackin	174	174:1-174:4	DENY. LP2.
Anna Mackin	174	174:5-174:8	DENY. LP2.
Anna Mackin	174	174:9-174:19	DENY. LP2.
Anna Mackin	174	174:20-175:5	DENY. LP2.
Anna Mackin	175	175:6-175:24	DENY. LP2.
Anna Mackin	176	176:6-176:19	DENY. LP2.
Anna Mackin	176	176:20-176:24	DENY. LP2.
Anna Mackin	176	176:26-177:8	DENY. LP2.
Anna Mackin	177	177:15-177:17	DENY. LP2.
Anna Mackin	177	177:19-177:22	DENY. LP2.
Anna Mackin	177	177:23-178:8	DENY. LP2.
Anna Mackin	178	178:9-178:14	DENY. LP2.
Anna Mackin	178	178:15-179:4	DENY. LP2.
Anna Mackin	179	179:5-179:16	DENY. LP2.
Anna Mackin	179	179:18-180:10	DENY. LP2.
Anna Mackin	180	180:11-180:23	DENY. LP2.
Anna Mackin	181	181:13-181:20	DENY. LP2.
Anna Mackin	181	181:21-182:4	DENY. LP2.
Anna Mackin	184	184:6-184:17	DENY. LP2.
Anna Mackin	185	185:3-185:7	DENY. LP2.
Anna Mackin	186	186:7-186:12	DENY. LP2.
Anna Mackin	186	186:13-186:21	DENY. LP2.
Anna Mackin	187	187:16-187:20	DENY. LP2.
Anna Mackin	187	187:21-188:10	DENY. LP2.
Anna Mackin	189	189:7-189:15	DENY. LP2.
Anna Mackin	190	190:3-190:8	DENY. LP2.
Anna Mackin	190	190:9-190:15	DENY. LP2.
Anna Mackin	190	190:16-191:2	DENY. LP2.
Anna Mackin	191	191:25-192:4	DENY. LP2.
Anna Mackin	194	194:22-195:3	DENY. LP2.
Anna Mackin	196	196:1-196:7	DENY. LP2.
Anna Mackin	196	196:22-197:2	DENY. LP2.
Anna Mackin	197	197:10-197:18	DENY. LP2.
Anna Mackin	198	198:9-198:14	DENY. LP2.
Anna Mackin	199	199:12-200:1	DENY. LP2.
Anna Mackin	200	200:9-200:13	DENY. LP2.
Anna Mackin	200	200:14-200:20	DENY. LP2.
Anna Mackin	201	201:3-201:22	DENY. LP2.
Anna Mackin	202	202:23-203:2	DENY. LP2.
Anna Mackin	210	210:13-210:23	DENY. LP2.
Anna Mackin	210	210:24-211:9	DENY. LP2.
Anna Mackin	211	211:10-211:15	DENY. LP2.
Anna Mackin	213	213:9-213:19	DENY. LP2.
Anna Mackin	215	215:9-215:20	DENY. LP2.

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Anna Mackin	217	217:14-217:22	DENY. LP2.
Anna Mackin	217	217:6-217:13	DENY. LP2.
Anna Mackin	221	221:19-222:1	DENY. LP2.
Anna Mackin	222	222:2-222:10	DENY. LP2.
Anna Mackin	222	222:11-222:23	DENY. LP2.
Anna Mackin	222	222:24-223:11	DENY. LP2.
Anna Mackin	225	225:25-226:9	DENY. LP2.
Anna Mackin	226	226:19-227:1	DENY. LP2.
Anna Mackin	227	227:21-228:8	DENY. LP2.
Anna Mackin	227	227:2-227:11	DENY. LP2.
Anna Mackin	229	229:2-229:14	DENY. LP2.
Anna Mackin	238	238:4-238:12	DENY. LP2.
Anna Mackin	244	244:12-244:18	DENY. LP2.
Anna Mackin	244	244:19-244:24	DENY. LP2.
Anna Mackin	245	245:7-245:22	DENY. LP2.
Anna Mackin	247	247:7-247:16	DENY. LP2.
Anna Mackin	248	248:1-248:8	DENY. LP2.
Anna Mackin	248	248:9-248:22	DENY. LP2.
Anna Mackin	250	250:23-251:9	DENY. LP2.
Anna Mackin	254	254:12-254:19	DENY. LP2.
Anna Mackin	255	255:4-255:9	DENY. LP2.
Anna Mackin	258	258:18-259:18	DENY. LP2.
Anna Mackin	260	260:11-260:16	DENY. LP2.
Anna Mackin	262	262:25-263:11	DENY. LP2.
Anna Mackin	263	263:12-263:21	DENY. LP2.
Anna Mackin	264	264:3-264:10	DENY. LP2.
Anna Mackin	267	267:22-268:13	DENY. LP2.
Anna Mackin	268	268:14-268:23	DENY. LP2.
Chris Gober	135	135:5-13	DENY. LP2.
Chris Gober	137	137:7-24	DENY. LP2.
Chris Gober	153	153:10-24	DENY. LP2.
Chris Gober	204	204:19-205:10	DENY. LP2.
Chris Gober	206	206:10-22	DENY. LP2.
Chris Gober	207	207:8-208:6	DENY. LP2.
Chris Gober	208	208:22-209:6	DENY. LP2.
Chris Gober	209	209:17-23	DENY. LP2.
Chris Gober	212	212:20-213:5	DENY. LP2.
Chris Gober	241	241:9-242:7	DENY. LP2.
Chris Gober	245	245:18-246:6	DENY. LP2.
Chris Gober	262	262:2-8	DENY. LP2.
Chris Gober	264	264:17-265:9	DENY. LP2.
Coleen Garcia	117	117:4-117:16	DENY. LP2.
Coleen Garcia	119	119:21-120:9	DENY. LP2.
Coleen Garcia	121	121:10-122:19	DENY. LP2.
Coleen Garcia	122	122:20-123:25	DENY. LP2.
Coleen Garcia	125	125:9-127:15	DENY. LP2.
Coleen Garcia	128	128:5-129:16	DENY. LP2.
Coleen Garcia	132	132:11-132:21	DENY IN PART, GRANT IN PART. LP2. Legislative privilege does not apply to the extent the answer provides public information, see LP3.
Coleen Garcia	133	133:4-134:2	DENY. LP2.
Coleen Garcia	136	136:8-136:15	DENY. LP2.
Coleen Garcia	139	139:20-140:4	DENY. LP2.
Coleen Garcia	141	141:18-142:14	DENY. LP2.
Coleen Garcia	144	144:5-145:1	DENY. LP2.
Coleen Garcia	145	145:20-146:10	DENY. LP2.
Coleen Garcia	148	148:7-148:21	DENY. LP2.
Coleen Garcia	150	150:1-150:11	DENY. LP2.
Coleen Garcia	156	156:24-157:13	DENY. LP2.
Coleen Garcia	159	159:16-160:1	DENY. LP2.
Coleen Garcia	160	160:6-161:8	DENY. LP2.

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Coleen Garcia	164	164:6-164:14	DENY. LP2.
Coleen Garcia	166	166:25-167:10	DENY. LP2.
Coleen Garcia	167	167:22-168:8	DENY. LP2.
Coleen Garcia	169	169:9-169:25	DENY. LP2.
Coleen Garcia	170	170:1-171:5	DENY. LP2.
Coleen Garcia	171	171:6-172:14	DENY. LP2.
Coleen Garcia	172	172:15-173:9	DENY. LP2.
Coleen Garcia	174	174:15-175:2	DENY. LP2.
Coleen Garcia	175	175:9-175:19	DENY IN PART, GRANT IN PART. LP2. Legislative privilege does not apply to the extent the answer provides public information, see LP3.
Coleen Garcia	175	175:24-176:3	DENY. LP2.
Coleen Garcia	176	176:4-176:25	DENY. LP2.
Coleen Garcia	178	178:16-179:11	DENY. LP2.
Coleen Garcia	180	180:9-180:23	DENY. LP2.
Coleen Garcia	182	182:1-182:7	DENY. LP2.
Coleen Garcia	182	182:16-184:5	DENY. LP2.
Coleen Garcia	185	185:10-186:4	DENY. LP2.
Coleen Garcia	187	187:19-188:12	DENY. LP2.
Coleen Garcia	188	188:13-189:13	DENY. LP2.
Coleen Garcia	190	190:3-191:21	DENY. LP2.
Coleen Garcia	191	191:19-193:15	DENY. LP2.
Coleen Garcia	194	194:15-195:15	DENY IN PART, GRANT IN PART. LP2. Legislative privilege does not apply to the extent the answer provides public information, see LP3.
Coleen Garcia	197	197:7-197:17	DENY. LP2.
Coleen Garcia	199	199:7-200:16	DENY. LP2.
Coleen Garcia	201	201:1-201:11	DENY. LP2.
Coleen Garcia	202	202:21-203:1	DENY. LP2.
Coleen Garcia	203	203:19-204:4	DENY. LP2.
Coleen Garcia	204	204:5-204:19	DENY. LP2.
Coleen Garcia	207	207:19-209:3	DENY. LP2.
Coleen Garcia	209	209:12-209:18	DENY. LP2.
Coleen Garcia	209	209:19-210:10	DENY. LP2.
Coleen Garcia	210	210:11-211:4	DENY. LP2.
Coleen Garcia	214	214:4-214:13	DENY. LP2.
Coleen Garcia	215	215:14-215:23	DENY. LP2.
Coleen Garcia	216	216:4-216:12	DENY. LP2.
Coleen Garcia	216	216:13-217:10	DENY. LP2.
Coleen Garcia	223	223:12-224:3	DENY. LP2.
Rep. Buckley	57	57:22-58:23	DENY. LP1.
Rep. Buckley	60	60:18-62:13	DENY. LP1.
Rep. Buckley	66	66:11-68:5	DENY. LP1.
Rep. Buckley	68	68:20-69:5	DENY. LP1.
Rep. Buckley	73	73:25-74:4	DENY. LP1.
Rep. Buckley	77	77:9-79:25	DENY. LP1.
Rep. Buckley	93	93:1-93:8	DENY. LP1.
Rep. Buckley	93	93:9-93:20	DENY. LP1.
Rep. Buckley	94	94:14-97:11	DENY IN PART, GRANT IN PART. LP1. Legislative privilege does not apply to the extent the question asks about Buckley's personal beliefs outside of his capacity as a legislator acting in the sphere of legitimate legislative activity.
Rep. Buckley	99	99:7-100:25	DENY. LP1.
Rep. Buckley	102	102:4-102:14	DENY. LP1.
Rep. Buckley	107	107:10-108:14	DENY. LP1.
Rep. Buckley	151	151:6-152:10	DENY. LP1.
Rep. Buckley	153	153:8-153:19	DENY. LP1.
Rep. Buckley	157	157:24-159:14	DENY. LP1.
Rep. Buckley	161	161:2-161:20	DENY. LP1.

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Rep. Buckley	177	177:10-177:24	DENY. LP1.
Rep. Buckley	179	179:1-179:14	DENY. LP1.
Rep. Buckley	191	191:7-191:21	DENY. LP1.
Rep. Buckley	195	195:9-196:15	DENY. LP1.
Rep. Buckley	200	200:14-201:22	DENY. LP1.
Rep. Buckley	206	206:6-206:15	DENY. LP1.
Rep. Buckley	208	208:16-208:25	DENY. LP1.
Rep. Buckley	212	212:16-213:7	DENY. LP1.
Rep. Buckley	241	241:18-242:25	DENY. LP1.
Rep. Buckley	257	257:1-257:8	DENY. LP1.
Rep. Buckley	271	271:24-273:25	DENY. LP1.
Rep. Guillen	33	33:2-10	DENY. LP1.
Rep. Guillen	150	150:3-7	DENY. LP1.
Rep. Guillen	150	150:8-16	DENY. LP1.
Rep. Guillen	150	150:12-16	GRANT. Improper objection.
Rep. Guillen	150	150:23-151:11	DENY. LP1.
Rep. Guillen	151	151:12-153:11	DENY. LP1.
Rep. Guillen	153	153:25-154:4	DENY. LP1.
Rep. Guillen	155	155:24-156:8	DENY. LP1.
Rep. Guillen	155	155:24-156:9	DENY. LP1.
Rep. Guillen	159	159:25-160:7	DENY. LP1.
Rep. Guillen	160	160:8-12	DENY. LP1.
Rep. Guillen	161	161:7-13	DENY. LP1.
Rep. Guillen	168	168:3-18	DENY. LP1.
Rep. Guillen	168	168:3-13	DENY. LP1.
Rep. Guillen	168	168:9-13	DENY. LP1.
Rep. Guillen	169	169:20-25	DENY. LP1.
Rep. Guillen	170	170:1-10	DENY. LP1.
Rep. Guillen	170	170:11-171:6	DENY. LP1.
Rep. Guillen	171	171:7-17	DENY. LP1.
Rep. Guillen	181	181:2-7	DENY. LP1.
Rep. Guillen	185	185:25-186:17	DENY. LP1.
Rep. Guillen	185	185:25-187:6	DENY. LP1.
Rep. Guillen	186	186:18-187:6	DENY. LP1.
Rep. Guillen	187	187:7-13	DENY. LP1.
Rep. Guillen	187	187:14-17	DENY. LP1.
Rep. Guillen	187	187:18-188:1	DENY. LP1.
Rep. Guillen	189	189:4-9	DENY. LP1.
Rep. Guillen	189	189:10-16	DENY. LP1.
Rep. Guillen	189	189:17-191:5	DENY. LP1.
Rep. Guillen	192	192:2-20	DENY. LP1.
Rep. Guillen	199	199:5-201:13	DENY. LP1.
Rep. Guillen	199	199:10-201:13	DENY. LP1.
Rep. Huberty	15	15:18-15:23	DENY. LP1.
Rep. Huberty	23	23:18-24:10	DENY. LP1.
Rep. Huberty	24	24:11-25:13	DENY. LP1.
Rep. Huberty	28	28:5-29:18	DENY. LP1.
Rep. Huberty	32	32:22-33:8	DENY. LP1.
Rep. Huberty	43	43:1-43:13	DENY. LP1.
Rep. Huberty	46	46:10-46:18	DENY. LP1.
Rep. Huberty	47	47:11-47:24	DENY. LP1.
Rep. Huberty	54	54:22-56:2	DENY. LP1.
Rep. Huberty	60	60:1-61:19	DENY. LP1.
Rep. Huberty	62	62:12-65:4	DENY. LP1.
Rep. Huberty	67	67:2-67:10	DENY. LP1.
Rep. Huberty	70	70:1-70:19	DENY. LP1.
Rep. Huberty	72	72:4-73:13	DENY. LP1.
Rep. Hunter	28	28:13-31:16	DENY. LP1.
Rep. Hunter	30	30:6-11	DENY. LP1.

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Rep. Hunter	30	30:20-25	DENY. LP1.
Rep. Hunter	31	31:1-15	DENY. LP1.
Rep. Hunter	47	47:10-15	DENY. LP1.
Rep. Hunter	50	50:8-15	DENY. LP1.
Rep. Hunter	50	50:22-51:5	DENY. LP1.
Rep. Hunter	51	51:12-16	DENY. LP1.
Rep. Hunter	54	54:22-56:3	DENY. LP1.
Rep. Hunter	56	56:19-57:12	DENY. LP1.
Rep. Hunter	57	57:5-12	DENY. LP1.
Rep. Hunter	59	59:13-63:5	DENY. LP1.
Rep. Hunter	59	59:13-61:5	DENY. LP1.
Rep. Hunter	61	61:6-62:24	DENY. LP1.
Rep. Hunter	62	62:25-63:18	DENY. LP1.
Rep. Hunter	64	64:1-67:7	DENY. LP1.
Rep. Hunter	68	68:3-69:6	DENY. LP1.
Rep. Hunter	69	69:8-70:16	DENY. LP1.
Rep. Hunter	69	69:8-78:17	DENY. LP1.
Rep. Hunter	70	70:17-72:10	DENY. LP1.
Rep. Hunter	72	72:11-73:5	DENY. LP1.
Rep. Hunter	73	73:6-14	DENY. LP1.
Rep. Hunter	73	73:15-74:12	DENY. LP1.
Rep. Hunter	74	74:13-75:15	DENY. LP1.
Rep. Hunter	74	74:13-78:4	DENY. LP1.
Rep. Hunter	75	75:16-76:14	DENY. LP1.
Rep. Hunter	79	79:10-81:25	DENY. LP1.
Rep. Hunter	82	82:1-15	DENY. LP1.
Rep. Hunter	82	82:16-83:7	DENY. LP1.
Rep. Hunter	83	83:8-25	DENY. LP1.
Rep. Hunter	85	85:9-86:21	DENY. LP1.
Rep. Hunter	86	86:7-12	~~DENY IN PART, GRANT IN PART.~~ LP1. Legislative privilege does not apply to the extent the answer provides public information, see LP3.
Rep. Hunter	86	86:22-90:16	DENY. LP1.
Rep. Hunter	90	90:17-95:21	~~DENY IN PART, GRANT IN PART.~~ LP2. Legislative privilege does not apply to the extent the answer provides public information, see LP3.
Rep. Hunter	97	97:11-99:8	DENY. LP1.
Rep. Hunter	99	99:21-101:2	DENY. LP1.
Rep. Hunter	101	101:25-103:21	DENY. LP1.
Rep. Hunter	102	102:9-24	DENY. LP1.
Rep. Hunter	104	104:20-106:24	DENY. LP1.
Rep. Hunter	107	107:8-108:20	DENY. LP1.
Rep. Hunter	108	108:11-16	GRANT. Improper objection.
Rep. Hunter	110	110:18-111:13	~~DENY IN PART, GRANT IN PART.~~ LP1. Legislative privilege does not apply to the extent the answer provides public information, see LP3.
Rep. Hunter	111	111:14-25	~~DENY IN PART, GRANT IN PART.~~ LP1. Legislative privilege does not apply to the extent the answer provides public information, see LP3.
Rep. Hunter	112	112:1-113:15	~~DENY IN PART, GRANT IN PART.~~ LP1. Legislative privilege does not apply to the extent the answer provides public information, see LP3.
Rep. Hunter	112	112:1-20	~~DENY IN PART, GRANT IN PART.~~ LP1. Legislative privilege does not apply to the extent the answer provides public information, see LP3.
Rep. Hunter	113	113:16-22	DENY. LP1.
Rep. Hunter	113	113:23-114:6	DENY. LP1.
Rep. Hunter	114	114:22-115:6	DENY. LP1.
Rep. Hunter	114	114:7-21	DENY. LP1.
Rep. Hunter	115	115:15-117:1	DENY. LP1.

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Rep. Hunter	117	117:2-119:3	DENY. LP1.
Rep. Hunter	117	117:8-118:15	DENY. LP1.
Rep. Hunter	119	119:12-121:3	DENY. LP1.
Rep. Hunter	121	121:4-122:4	DENY. LP1.
Rep. Hunter	121	121:4-18	DENY. LP1.
Rep. Hunter	124	124:3-10	DENY. LP1.
Rep. Hunter	124	124:21-125:15	DENY. LP1.
Rep. Hunter	125	125:13-18	DENY. LP1.
Rep. Hunter	125	125:16-126:16	DENY. LP1.
Rep. Hunter	127	127:7-22	DENY. LP1.
Rep. Hunter	127	127:7-15	GRANT. Improper objection.
Rep. Hunter	128	128:12-24	DENY. LP1.
Rep. Hunter	128	128:25-129:24	DENY. LP1.
Rep. Hunter	128	128:25-129:15	DENY. LP1.
Rep. Hunter	132	132:17-25	DENY. LP1.
Rep. Hunter	134	134:21-135:11	DENY. LP1.
Rep. Hunter	136	136:22-137:24	DENY. LP1.
Rep. Hunter	136	136:23-137:24	DENY. LP1.
Rep. Hunter	136	136:23-139:21	DENY. LP1.
Rep. Hunter	138	138:25-139:10	DENY. LP1.
Rep. Hunter	140	140:8-21	DENY. LP1.
Rep. Hunter	141	141:3-15	DENY. LP1.
Rep. Hunter	141	141:20-142:11	DENY. LP1.
Rep. Hunter	142	142:25-143:12	DENY. LP1.
Rep. Hunter	145	145:8-17	DENY. LP1.
Rep. Hunter	146	146:2-9	DENY. LP1.
Rep. Hunter	149	149:14-150:19	~~DENY IN PART, GRANT IN PART.~~ LP1. Legislative privilege does not apply to the extent the answer provides public information, see LP3.
Rep. Hunter	150	150:20-151:11	~~DENY IN PART, GRANT IN PART.~~ LP1. Legislative privilege does not apply to the extent the answer provides public information, see LP3.
Rep. Hunter	151	151:12-152:15	DENY. LP1.
Rep. Hunter	152	152:2-15	DENY. LP1.
Rep. Hunter	152	152:16-153:15	DENY. LP1.
Rep. Hunter	155	155:12-19	DENY. LP1.
Rep. Hunter	157	157:13-158:13	DENY. LP1.
Rep. Hunter	158	158:15-159:12	DENY. LP1.
Rep. Hunter	161	161:19-162:24	~~DENY IN PART, GRANT IN PART.~~ LP1. Legislative privilege does not apply to the extent the answer provides public information, see LP3.
Rep. Hunter	162	162:9-24	~~DENY IN PART, GRANT IN PART.~~ LP1. Legislative privilege does not apply to the extent the answer provides public information, see LP3.
Rep. Hunter	164	164:2-165:21	~~DENY IN PART, GRANT IN PART.~~ LP1. Legislative privilege does not apply to the extent the answer provides public information, see LP3.
Rep. Hunter	164	164:18-165:21	~~DENY IN PART, GRANT IN PART.~~ LP1. Legislative privilege does not apply to the extent the answer provides public information, see LP3.
Rep. Hunter	165	165:11-21	~~DENY IN PART, GRANT IN PART.~~ LP1. Legislative privilege does not apply to the extent the answer provides public information, see LP3.
Rep. Hunter	174	174:1-8	~~DENY IN PART, GRANT IN PART.~~ LP1. Legislative privilege does not apply to the extent the answer provides public information, see LP3.
Rep. Hunter	174	174:15-175:3	DENY. LP1.
Rep. Hunter	176	176:11-14	DENY. LP1.
Rep. Hunter	178	178:5-21	DENY. LP1.
Rep. Hunter	178	178:19-21	DENY. LP1.

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Rep. Hunter	180	180:17-181:3	DENY. LP1.
Rep. Hunter	184	184:20-25	DENY. LP1.
Rep. Hunter	186	186:16-18	DENY. LP1.
Rep. Hunter	188	188:9-22	DENY. LP1.
Rep. Hunter	188	188:23-189:3	DENY. LP1.
Rep. Hunter	189	189:8-15	DENY. LP1.
Rep. Hunter	193	193:7-19	DENY. LP1.
Rep. Hunter	193	193:20-25	DENY. LP1.
Rep. Hunter	194	194:8-195:3	DENY. LP1.
Rep. Hunter	195	195:4-12	DENY. LP1.
Rep. Hunter	196	196:21-197:5	DENY. LP1.
Rep. Hunter	196	196:13-20	DENY. LP1.
Rep. Hunter	215	215:7-12	DENY. LP1.
Rep. Hunter	215	215:23-216:3	DENY. LP1.
Rep. Hunter	217	217:22-218:6	DENY. LP1.
Rep. Hunter	218	218:7-16	DENY. LP1.
Rep. Hunter	228	228:10-229:1	DENY. LP1.
Rep. Hunter	230	230:21-231:7	DENY. LP1.
Rep. Hunter	231	231:15-232:11	DENY. LP1.
Rep. Hunter	234	234:3-14	DENY. LP1.
Rep. Hunter	234	234:21-235:3	DENY. LP1.
Rep. Hunter	238	238:8-21	DENY. LP1.
Rep. Hunter	241	241:12-244:10	~~DENY IN PART, GRANT IN PART.~~ LP1. Legislative privilege does not apply to the extent the answer provides public information, see LP3.
Rep. Hunter	245	245:6-15	DENY. LP1.
Rep. Hunter	247	247:20-250:13	DENY. LP1.
Rep. Hunter	251	251:10-252:4	DENY. LP1.
Rep. Hunter	254	254:19-255:3	DENY. LP1.
Rep. Hunter	255	255:25-256:21	DENY. LP1.
Rep. Hunter	257	257:11-258:4	DENY. LP1.
Rep. Hunter	259	259:5-25	DENY. LP1.
Rep. Hunter	265	265:5-266:7	DENY. LP1.
Rep. Hunter	266	266:17-267:2	DENY. LP1.
Rep. Hunter	268	268:21-270:4	DENY. LP1.
Rep. Hunter	270	270:16-271:11	DENY. LP1.
Rep. Hunter	271	271:12-272:2	DENY. LP1.
Rep. Hunter	276	276:3-15	DENY. LP1.
Rep. Hunter	276	276:18-277:5	DENY. LP1.
Rep. Hunter	277	277:9-22	DENY. LP1.
Rep. Hunter	278	278:19-279:21	DENY. LP1.
Rep. Hunter	280	280:14-281:2	DENY. LP1.
Rep. Hunter	287	287:25-288:8	DENY. LP1.
Rep. Hunter	288	288:9-24	DENY. LP1.
Rep. Hunter	290	290:13-291:7	DENY. LP1.
Rep. Hunter	291	291:19-292:20	DENY. LP1.
Rep. Hunter	294	294:7-295:16	DENY. LP1.
Rep. Hunter	295	295:17-24	DENY. LP1.
Rep. Hunter	295	295:25-296:7	~~DENY IN PART, GRANT IN PART.~~ **LP1. Legislative privilege does not apply to the extent the question asks only about theoretical possibility. LP3.**
Rep. Hunter	296	296:14-297:23	DENY. LP1.
Rep. Hunter	297	297:24-298:23	DENY. LP1.
Rep. Hunter	298	298:24-299:20	DENY. LP1.
Rep. Hunter	303	303:7-15	~~DENY IN PART, GRANT IN PART.~~ LP2. Legislative privilege does not apply to the extent the answer provides public information, see LP3.
Rep. Hunter	303	303:23-304:8	DENY. LP1.
Rep. Hunter	306	306:1-18	DENY. LP1.

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Rep. Hunter	306	306:24-308:13	DENY. LP1.
Rep. Hunter	308	308:18-309:2	DENY. LP1.
Rep. Jetton	32	32:1-16	DENY. LP1.
Rep. Jetton	41	41:4-17	DENY. LP1.
Rep. Jetton	42	42:4-10	DENY. LP1.
Rep. Jetton	42	42:11-16	DENY. LP1.
Rep. Jetton	42	42:24-43:1	DENY. LP1.
Rep. Jetton	43	43:9-16	DENY. LP1.
Rep. Jetton	43	43:24-44:4	DENY. LP1.
Rep. Jetton	48	48:7-50:6	DENY. LP1.
Rep. Jetton	50	50:7-11	DENY. LP1.
Rep. Jetton	50	50:7-23	DENY. LP1.
Rep. Jetton	50	50:24-51:6	DENY. LP1.
Rep. Jetton	51	51:11-52:19	DENY. LP1.
Rep. Jetton	52	52:25-53:4	DENY. LP1.
Rep. Jetton	53	53:5-10	DENY. LP1.
Rep. Jetton	53	53:20-54:17	DENY. LP1.
Rep. Jetton	54	54:25-55:21	DENY. LP1.
Rep. Jetton	56	56:3-57:3	DENY. LP1.
Rep. Jetton	57	57:24-58:1	GRANT. Improper objection.
Rep. Jetton	60	60:21-61:2	DENY. LP1.
Rep. Jetton	62	62:3-23	DENY. LP1.
Rep. Jetton	62	62:24-63:7	DENY. LP1.
Rep. Jetton	63	63:12-64:7	DENY. LP1.
Rep. Jetton	63	63:1-7	DENY. LP1.
Rep. Jetton	69	69:10-21	DENY. LP1.
Rep. Jetton	69	69:22-71:13	DENY. LP1.
Rep. Jetton	74	74:7-16	DENY. LP1.
Rep. Jetton	75	75:25-76:6	DENY. LP1.
Rep. Jetton	77	77:10-78:17	DENY. LP1.
Rep. Jetton	81	81:3-82:3	DENY. LP1.
Rep. Jetton	82	82:4-25	DENY. LP1.
Rep. Jetton	84	84:5-17	DENY. LP1.
Rep. Jetton	86	86:1-87:25	DENY. LP1.
Rep. Jetton	88	88:13-19	DENY. LP1.
Rep. Jetton	88	88:20-89:5	DENY. LP1.
Rep. Jetton	89	89:6-17	DENY. LP1.
Rep. Jetton	91	91:21-93:17	DENY. LP1.
Rep. Jetton	93	93:18-94:11	DENY. LP1.
Rep. Jetton	94	94:24-95:13	DENY. LP1.
Rep. Jetton	110	110:2-14	DENY. LP1.
Rep. Jetton	113	113:22-115:1	DENY. LP1.
Rep. Jetton	116	116:17-117:4	DENY. LP1.
Rep. Jetton	116	116:11-16	DENY. LP1.
Rep. Jetton	118	118:25-119:5	DENY. LP1.
Rep. Jetton	119	119:18-22	DENY. LP1.
Rep. Jetton	124	124:18-126:1	DENY. LP1.
Rep. Jetton	126	126:9-127:8	DENY. LP1.
Rep. Jetton	129	129:22-130:4	DENY. LP1.
Rep. Jetton	129	129:1-18	DENY. LP1.
Rep. Jetton	133	133:19-134:4	DENY. LP1.
Rep. Jetton	139	139:6-13	DENY. LP1.
Rep. Jetton	140	140:11-20	DENY IN PART, GRANT IN PART. LP1. Legislative privilege does not apply to the extent the answer provides public information, see LP3.
Rep. Jetton	142	142:11-143:2	DENY. LP1.
Rep. Jetton	144	144:22-145:5	DENY. LP1.
Rep. Jetton	147	147:25-150:16	DENY. LP1.
Rep. Jetton	150	150:24-151:18	DENY IN PART, GRANT IN PART. LP1. Legislative privilege does not apply to the extent the answer provides public information, see LP3.

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Rep. Jetton	152	152:1-6	DENY. LP1.
Rep. Jetton	154	154:18-25	DENY IN PART, GRANT IN PART. LP1. Legislative privilege does not apply to the extent the answer provides public information, see LP3.
Rep. Jetton	155	155:6-12	DENY. LP1.
Rep. Jetton	156	156:2-157:13	DENY. LP1.
Rep. Jetton	158	158:1-159:1	DENY. LP1.
Rep. Jetton	159	159:11-160:16	DENY. LP1.
Rep. Jetton	160	160:22-161:21	DENY. LP1.
Rep. Jetton	162	162:5-164:20	DENY. LP1.
Rep. Jetton	165	165:9-15	DENY. LP1.
Rep. Jetton	165	165:22-166:2	DENY. LP1.
Rep. Jetton	171	171:23-172:6	DENY. LP1.
Rep. Jetton	172	172:6-14	DENY. LP1.
Rep. Jetton	172	172:24-173:22	DENY. LP1.
Rep. Jetton	173	173:23-174:3	DENY. LP1.
Rep. Jetton	174	174:4-9	DENY. LP1.
Rep. Jetton	175	175:3-16	DENY. LP1.
Rep. Jetton	175	175:17-24	DENY. LP1.
Rep. Jetton	176	176:20-177:4	DENY. LP1.
Rep. Jetton	177	177:19-178:4	DENY. LP1.
Rep. Jetton	180	180:20-181:21	DENY. LP1.
Rep. Jetton	184	184:10-20	DENY. LP1.
Rep. Jetton	185	185:5-20	DENY. LP1.
Rep. Jetton	187	187:3-23	DENY. LP1.
Rep. Jetton	188	188:9-18	DENY. LP1.
Rep. Jetton	189	189:4-8	DENY. LP1.
Rep. Jetton	191	191:17-25	DENY. LP1.
Rep. Jetton	194	194:6-14	DENY. LP1.
Rep. Jetton	195	195:17-196:1	DENY. LP1.
Rep. Jetton	196	196:2-14	DENY IN PART, GRANT IN PART. LP1. Legislative privilege does not apply to the extent the answer provides public information, see LP3.
Rep. Jetton	197	197:13-22	DENY. LP1.
Rep. Jetton	198	198:6-25	DENY. LP1.
Rep. Jetton	199	199:9-18	DENY. LP1.
Rep. Jetton	204	204:9-17	DENY. LP1.
Rep. Jetton	204	204:18-205:6	DENY. LP1.
Rep. Jetton	205	205:7-23	DENY. LP1.
Rep. Jetton	206	206:12-25	DENY. LP1.
Rep. Jetton	207	207:1-12	DENY. LP1.
Rep. Jetton	207	207:18-208:18	DENY. LP1.
Rep. Jetton	210	210:20-211:15	DENY. LP1.
Rep. Jetton	211	211:16-18	GRANT. Improper objection.
Rep. Jetton	211	211:19-23	DENY. LP1.
Rep. Jetton	211	211:24-213:9	DENY. LP1.
Rep. Jetton	214	214:13-19	DENY. LP1.
Rep. Jetton	214	214:20-215:10	DENY IN PART, GRANT IN PART. LP1. Legislative privilege does not apply to the extent the answer provides public information, see LP3.
Rep. Jetton	215	215:11-18	DENY IN PART, GRANT IN PART. LP1. Legislative privilege does not apply to the extent the answer provides public information, see LP3.
Rep. Jetton	215	215:19-216:19	DENY. LP1.
Rep. Jetton	216	216:20-217:13	DENY. LP1.
Rep. Jetton	217	217:14-25	DENY. LP1.
Rep. Jetton	218	218:1-10	DENY. LP1.
Rep. Jetton	218	218:11-219:1	DENY. LP1.
Rep. Jetton	219	219:9-220:2	DENY. LP1.
Rep. Jetton	220	220:5-221:16	DENY. LP1.
Rep. Jetton	222	222:8-25	DENY. LP1.

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Rep. Jetton	223	223:1-7	DENY. LP1.
Rep. Jetton	223	223:8-224:21	DENY. LP1.
Rep. Jetton	224	224:22-225:23	DENY. LP1.
Rep. Jetton	226	226:3-227:11	DENY. LP1.
Rep. Jetton	232	232:18-233:5	DENY. LP1.
Rep. Jetton	233	233:6-24	DENY. LP1.
Rep. Landgraf	18	18:17-19:11	DENY. LP1.
Rep. Landgraf	20	20:3-20:4	GRANT. Improper objection.
Rep. Landgraf	44	44:19-45:5	DENY. LP1.
Rep. Landgraf	46	46:7-47:8	DENY. LP1.
Rep. Landgraf	49	49:10-49:21	DENY. LP1.
Rep. Landgraf	58	58:25-58:20	DENY. LP1.
Rep. Landgraf	60	60:3-14	DENY. LP1.
Rep. Landgraf	69	69:3-69:18	DENY IN PART, GRANT IN PART. LP1. Legislative privilege does not apply to the extent the answer provides public information, see LP3.
Rep. Landgraf	69	69:25-70:9	DENY IN PART, GRANT IN PART. LP1. Legislative privilege does not apply to the extent the answer provides public information, see LP3.
Rep. Landgraf	70	70:16-70:21	DENY IN PART, GRANT IN PART. LP1. Legislative privilege does not apply to the extent the answer provides public information, see LP3.
Rep. Landgraf	73	73:19-74:13	DENY IN PART, GRANT IN PART. LP1. Legislative privilege does not apply to the extent the answer provides public information, see LP3.
Rep. Landgraf	104	104:21-105:8	DENY. LP1.
Rep. Landgraf	108	108:17-109:17	DENY. LP1.
Rep. Landgraf	113	113:20-113:24	DENY. LP1.
Rep. Landgraf	114	114:23-116:8	DENY. LP1.
Rep. Landgraf	118	118:9-119:4	DENY. LP1.
Rep. Landgraf	119	119:5-119:21	DENY. LP1.
Rep. Landgraf	119	119:22-120:24	DENY. LP1.
Rep. Landgraf	125	125:3-125:13	DENY. LP1.
Rep. Landgraf	137	137:14-137:19	DENY. LP1.
Rep. Landgraf	143	143:16-144:5	DENY. LP1.
Rep. Landgraf	144	144:6-145:5	DENY. LP1.
Rep. Landgraf	156	156:3-157:16	DENY. LP1.
Rep. Landgraf	157	157:17-158:4	DENY. LP1.
Rep. Landgraf	158	158:5-159:2	DENY. LP1.
Rep. Landgraf	159	159:3-159:21	DENY. LP1.
Rep. Landgraf	177	177:20-178:6	DENY. LP1.
Rep. Landgraf	178	178:7-179:3	DENY. LP1.
Rep. Landgraf	179	179:4-179:23	DENY. LP1.
Rep. Landgraf	179	179:24-180:16	DENY. LP1.
Rep. Landgraf	182	182:7-183:11	DENY. LP1.
Rep. Landgraf	183	183:21-184:10	DENY. LP1.
Rep. Landgraf	184	184:17-184:25	DENY. LP1.
Rep. Landgraf	186	186:8-187:8	DENY. LP1.
Rep. Landgraf	188	188:24-190:15	DENY. LP1.
Rep. Landgraf	190	190:18-191:3	DENY IN PART, GRANT IN PART. LP1. Legislative privilege does not apply to the extent the question asks only about theoretical possibility. LP3.
Rep. Landgraf	191	191:13-192:3	DENY. LP1.
Rep. Landgraf	192	192:13-193:6	DENY. LP1.
Rep. Landgraf	193	193:13-194:11	DENY. LP1.
Rep. Landgraf	195	195:21-196:18	DENY. LP1.
Rep. Landgraf	195	195:1-195:13	DENY. LP1.
Rep. Landgraf	196	196:19-197:7	DENY. LP1.
Rep. Landgraf	204	204:15-204:24	DENY. LP1.
Rep. Landgraf	235	235:9-236:11	GRANT. LP3.

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Rep. Landgraf	246	246:21-247:3	DENY. LP1.
Rep. Landgraf	260	260:24-264:5	DENY. LP1.
Rep. Landgraf	264	264:6-265:15	DENY IN PART, GRANT IN PART. LP1. Legislative privilege does not apply to the extent the question asks only about theoretical possibility. LP3.
Rep. Landgraf	266	266:20-268:8	DENY IN PART, GRANT IN PART. LP1. Legislative privilege does not apply to the extent the question asks only about theoretical possibility. LP3.
Rep. Landgraf	271	271:11-273:5	GRANT. Untimely assertion of legislative privilege. See ECF No. 282 at 4.
Rep. Landgraf	276	276:19-277:5	DENY. LP1.
Rep. Landgraf	277	277:6-278:4	DENY. LP1.
Rep. Landgraf	279	279:4-280:23	DENY. LP1.
Rep. Landgraf	282	282:6-16	DENY. LP1.
Rep. Landgraf	283	283:17-284:9	DENY. LP1.
Rep. Landgraf	284	284:10-284:25	DENY. LP1.
Rep. Landgraf	291	291:10-292:17	DENY. LP1.
Rep. Landgraf	293	293:17-294:14	DENY. LP1.
Rep. Landgraf	294	294:15-295:11	DENY. LP1.
Rep. Lozano	26	26:1-21:7	DENY. LP1.
Rep. Lozano	51	51:15-52:18	DENY. LP1.
Rep. Lozano	52	52:24-53:13	DENY. LP1.
Rep. Lozano	59	59:14-60:4	DENY. LP1.
Rep. Lozano	68	68:13-69:5	DENY. LP1.
Rep. Lozano	82	82:21-83:4	DENY. LP1.
Rep. Lozano	89	89:21-90:7	DENY. LP1.
Rep. Lozano	89	89:16-89:20	GRANT. Improper objection.
Rep. Lozano	97	97:16-97:23	GRANT. Improper objection.
Rep. Lozano	98	98:8-98:13	DENY. LP1.
Rep. Lozano	98	98:18-99:3	DENY. LP1.
Rep. Lozano	100	100:19-102:8	DENY. LP1.
Rep. Lozano	102	102:22-104:1	DENY. LP1.
Rep. Lozano	104	104:16-104:24	DENY. LP1.
Rep. Lozano	104	104:25-105:11	DENY. LP1.
Rep. Lozano	105	105:22-106:6	DENY. LP1.
Rep. Lozano	106	106:7-107:1	DENY. LP1.
Rep. Lozano	107	107:13-108:21	DENY. LP1.
Rep. Lozano	110	110:3-15	DENY. LP1.
Rep. Lozano	111	111:24-112:5	DENY. LP1.
Rep. Lozano	112	112:12-112:17	DENY. LP1.
Rep. Lozano	112	112:25-113:6	DENY. LP1.
Rep. Lozano	113	113:6-113:18	DENY. LP1.
Rep. Lozano	113	113:22-114:11	DENY. LP1.
Rep. Lozano	116	116:21-117:1	GRANT. Improper objection.
Rep. Lozano	118	118:12-119:11	DENY. LP1.
Rep. Lozano	119	119:15-120:10	DENY. LP1.
Rep. Lozano	121	121:11-121:18	DENY. LP1.
Rep. Lozano	121	121:19-122:3	DENY. LP1.
Rep. Lozano	127	127:21-129:2	DENY. LP1.
Rep. Murr	76	76:17-77:20	DENY. LP1.
Rep. Murr	78	78:6-79:5	DENY. LP1.
Rep. Murr	83	83:18-84:8	DENY. LP1.
Rep. Murr	84	84:9-86:4	DENY. LP1.
Rep. Murr	86	86:5-86:24	DENY. LP1.
Rep. Murr	86	86:25-88:2	DENY. LP1.
Rep. Murr	88	88:3-90:8	DENY. LP1.
Rep. Murr	90	90:21-92:3	DENY. LP1.
Rep. Murr	93	93:17-93:22	DENY. LP1.
Rep. Murr	100	100:9-101:3	DENY. LP1.

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Rep. Murr	102	102:11-103:12	DENY. LP1.
Rep. Murr	103	103:13-104:9	DENY. LP1.
Rep. Murr	104	104:10-104:23	DENY. LP1.
Rep. Murr	105	105:1-105:13	DENY. LP1.
Rep. Murr	105	105:14-105:25	DENY. LP1.
Rep. Murr	106	106:22-107:03	DENY. LP1.
Rep. Murr	108	108:2-108:18	DENY. LP1.
Rep. Murr	109	109:17-108:9	DENY. LP1.
Rep. Murr	111	111:3-111:15	DENY. LP1.
Rep. Murr	111	111:25-113:3	DENY. LP1.
Rep. Murr	113	113:4-113:20	DENY. LP1.
Rep. Murr	114	114:23-115:16	DENY. LP1.
Rep. Murr	116	116:1-116:13	DENY. LP1.
Rep. Murr	116	116:16-117:2	DENY. LP1.
Rep. Murr	117	117:3-118:2	DENY. LP1.
Rep. Murr	118	118:3-119:12	DENY. LP1.
Rep. Murr	119	119:13-120:9	DENY. LP1.
Rep. Murr	120	120:10-121:18	DENY. LP1.
Rep. Murr	121	121:19-123:11	DENY. LP1.
Rep. Murr	123	123:12-124:4	DENY. LP1.
Rep. Murr	124	124:5-124:16	DENY. LP1.
Rep. Murr	130	130:18-132:2	DENY. LP1.
Rep. Murr	133	133:3-133:12	DENY. LP1.
Rep. Murr	133	133:17-134:8	DENY. LP1.
Rep. Murr	136	136:11-136:23	DENY. LP1.
Rep. Murr	136	136:24-138:8	DENY. LP1.
Rep. Murr	139	139:22-140:14	DENY. LP1.
Rep. Murr	142	142:23-143:7	DENY. LP1.
Rep. Murr	143	143:8-143:25	DENY. LP1.
Rep. Murr	144	144:1-144:15	DENY. LP1.
Rep. Murr	144	144:16-145:7	DENY. LP1.
Rep. Murr	146	146:11-147:3	DENY. LP1.
Rep. Murr	147	147:5-147:12	DENY. LP1.
Rep. Murr	147	147:16-148:4	DENY. LP1.
Rep. Murr	148	148:5-149:3	DENY. LP1.
Rep. Murr	149	149:20-150:14	DENY. LP1.
Rep. Murr	149	149:4-149:19	DENY. LP1.
Rep. Murr	157	157:24-158:7	DENY. LP1.
Rep. Murr	159	159:20-160:10	DENY. LP1.
Rep. Murr	159	159:5-159:19	DENY. LP1.
Rep. Murr	160	160:15-160:21	DENY. LP1.
Rep. Murr	163	163:4-163:25	DENY. LP1.
Rep. Shine	21	21:16-23:19	GRANT, 22:16-18, improper objection, DENY others LP1
Rep. Shine	27	27:10-29:6	DENY. LP1.
Rep. Shine	58	58:9-59:15	DENY. LP1.
Rep. Shine	58	58:23-62:2	GRANT, 60:13-14, improper objection, DENY others LP1
Rep. Shine	62	62:11-62:19	GRANT. Improper objection.
Rep. Shine	63	63:3-64:15	DENY. LP1.
Rep. Shine	66	66:11-66:22	**GRANT. LP3.**
Rep. Shine	68	68:9-68:19	DENY. LP1.
Rep. Shine	72	72:20-74:1	DENY. LP1.
Rep. Shine	79	79:18-81:6	DENY. LP1.
Rep. Shine	99	99:6-103:1	DENY. LP1.
Rep. Shine	105	105:14-106:9	GRANT, 106:8-9, improper objection, DENY others LP1
Rep. Shine	107	107:9-107:19	DENY. LP1.
Rep. Shine	116	116:1-116:9	DENY. LP1.
Rep. Shine	117	117:12-124:17	DENY. LP1.
Rep. Shine	143	143:4-143:9	DENY. LP1.

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Sean Opperman	56	56:03-56:25	DENY. LP2.
Sean Opperman	57	57:19-59:16	DENY. LP2.
Sean Opperman	64	64:01-66:09	DENY. LP2.
Sean Opperman	72	72:03-73:01	DENY. LP2.
Sean Opperman	73	73:24-74:08	DENY. LP2.
Sean Opperman	74	74:25-75:17	DENY. LP2.
Sean Opperman	77	77:03-77:10	DENY. LP2.
Sean Opperman	77	77:10-78:17	DENY. LP2.
Sean Opperman	80	80:14-80:22	DENY. LP2.
Sean Opperman	84	84:22-85:11	DENY. LP2.
Sean Opperman	85	85:21-86	DENY. LP2.
Sean Opperman	89	89:15-89:23	DENY. LP2.
Sean Opperman	91	91:15-92:05	DENY. LP2.
Sean Opperman	92	92:09-92:25	DENY. LP2.
Sean Opperman	93	93:01-93:11	DENY. LP2.
Sean Opperman	93	93:12-94:02	DENY. LP2.
Sean Opperman	94	94:23-95:96:09	DENY. LP2.
Sean Opperman	94	94:08-94:15	DENY. LP2.
Sean Opperman	97	97:24-98:10	DENY. LP2.
Sean Opperman	101	101:04-101:10	DENY. LP2.
Sean Opperman	101	101:25-102:08	DENY. LP2.
Sean Opperman	103	103:20-104:03	DENY. LP2.
Sean Opperman	104	104:21-105:4	DENY. LP2.
Sean Opperman	105	105:15-105:24	DENY. LP2.
Sean Opperman	105	105:25-106:08	DENY. LP2.
Sean Opperman	106	106:09-106:14	DENY. LP2.
Sean Opperman	106	106:15-107:11	DENY. LP2.
Sean Opperman	107	107:12-107:20	DENY. LP2.
Sean Opperman	109	109:07-109:10	DENY. LP2.
Sean Opperman	111	111:13-111:19	DENY. LP2.
Sean Opperman	111	111:04-111:12	DENY. LP2.
Sean Opperman	114	114:17-115:08	DENY. LP2.
Sean Opperman	114	114:02-114:16	DENY. LP2.
Sean Opperman	115	115:14-116:08	DENY. LP2.
Sean Opperman	117	117:25-118:06	DENY. LP2.
Sean Opperman	117	117:2-117:19	DENY. LP2.
Sean Opperman	118	118:16-118:22	DENY. LP2.
Sean Opperman	120	120:07-121:15	DENY. LP2.
Sean Opperman	123	123:13-123:22	DENY. LP2.
Sean Opperman	123	123:23-125:14	DENY. LP2.
Sean Opperman	125	125:15-125:25	DENY. LP2.
Sean Opperman	126	126:07-127:02	DENY. LP2.
Sean Opperman	127	127:19-128:19	DENY. LP2.
Sean Opperman	128	128:20-129:16	DENY. LP2.
Sean Opperman	131	131:22-132:03	DENY. LP2.
Sean Opperman	132	132:12-132:17	DENY. LP2.
Sean Opperman	132	132:04-132:11	DENY. LP2.
Sean Opperman	134	134:16-134:22	DENY. LP2.
Sean Opperman	136	136:17-138:05	DENY. LP2.
Sean Opperman	138	138:06-138:11	DENY. LP2.
Sean Opperman	138	138:12-139:02	DENY. LP2.
Sean Opperman	173	173:25-174:08	DENY. LP2.
Sean Opperman	174	174:09-175:02	DENY. LP2.
Sean Opperman	175	175:03-175:10	DENY. LP2.
Sean Opperman	177	177:09-177:25	DENY. LP2.
Sean Opperman	178	178:05—178:12	DENY. LP2.
Sean Opperman	185	185:16-188:08	DENY. LP2.
Sean Opperman	204	204:23-205:07	DENY. LP2.

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Sean Opperman	206	206:23-208:19	DENY. LP2.
Sean Opperman	218	218:21-219:10	DENY. LP2.
Sean Opperman	225	225:08-225:19	DENY. LP2.
Sean Opperman	226	226:06-226:12	DENY. LP2.
Sean Opperman	227	227:25-229:07	DENY. LP2.
Sean Opperman	229	229:16-230:19	DENY. LP2.
Sean Opperman	230	230:20-231:06	DENY. LP2.
Sean Opperman	231	231:08-231:12	DENY. LP2.
Sean Opperman	231	231:23-233:20	DENY. LP2.
Sean Opperman	234	234:11-234:17	DENY. LP2.
Sean Opperman	237	237:06-238:13	DENY. LP2.
Sean Opperman	239	239:16-242:04	DENY. LP2.
Sean Opperman	242	242:09-243:13	DENY. LP2.
Sean Opperman	247	247:24-249:14	DENY. LP2.
Sean Opperman	249	249:21-250:23	DENY. LP2.
Sean Opperman	250	250:24-252:11	DENY. LP2.
Sean Opperman	252	252:12-253:18	DENY. LP2.
Sean Opperman	255	255:19-256:17	DENY. LP2.
Sean Opperman	256	256:18-257:14	DENY. LP2.
Sean Opperman	258	258:03-259:03	DENY. LP2.
Sean Opperman	265	265:25-268:03	DENY. LP2.
Sean Opperman	268	268:04-269:06	DENY. LP2.
Sean Opperman	270	270:13-270:22	DENY. LP2.
Sean Opperman	271	271:04-272:16	DENY. LP2.
Sean Opperman	273	273:20-274:06	DENY. LP2.
Sean Opperman	274	274:23-275:04	DENY. LP2.
Sean Opperman	276	276:06-276:12	DENY. LP2.
Sean Opperman	276	276:6-276:12	DENY. LP2.
Sean Opperman	285	285:25-292:12	DENY. LP2.
Sean Opperman	292	292:21-295:13	DENY. LP2.
Sean Opperman	295	295:14-296:03	DENY. LP2.
Sean Opperman	296	296:04-296:09	DENY. LP2.
Sean Opperman	305	305:14-307:25	DENY. LP2.
Sean Opperman	308	308:1-308:24	DENY. LP2.
Sean Opperman	309	309:10-309:19	DENY. LP2.
Sean Opperman	311	311:08-311:15	DENY. LP2.
Sean Opperman	313	313:07-313:13	DENY. LP2.
Sean Opperman	315	315:22-317:20	DENY. LP2.
Sen. Hancock	46	46:16-46:23	GRANT. Improper objection.
Sen. Hancock	62	62:4-62:18	DENY. LP1.
Sen. Hancock	64	64:16-64:22	DENY. LP1.
Sen. Hancock	66	66:8-66:14	DENY. LP1.
Sen. Hancock	66	66:15-66:21	DENY. LP1.
Sen. Hancock	107	107:15-107:23	DENY. LP1.
Sen. Hancock	107	107:24-108:5	DENY. LP1.
Sen. Hancock	108	108:6-108:15	DENY. LP1.
Sen. Hancock	110	110:13-111:4	DENY. LP1.
Sen. Hancock	112	112:9-112:12	DENY. LP1.
Sen. Hancock	113	113:1-113:6	GRANT. Improper objection.
Sen. Hancock	114	114:15-115:1	GRANT. Improper objection.
Sen. Hancock	115	115:3-115:13	DENY. LP1.
Sen. Hancock	115	115:15-115:20	DENY. LP1.
Sen. Hancock	115	115:21-116:5	DENY. LP1.
Sen. Hancock	118	118:22-119:2	DENY. LP1.
Sen. Hancock	119	119:4-119:8	DENY. LP1.
Sen. Hancock	119	119:9-119:13	GRANT. Improper objection.
Sen. Hancock	119	119:18-119:24	DENY. LP1.
Sen. Hancock	120	120:1-120:7	DENY. LP1.
Sen. Hancock	120	120:8-120:18	GRANT. Improper objection.

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Deponent	Starting Page Number	Line Number	RULING
Sen. Hancock	121	121:2-121:7	DENY. LP1.
Sen. Hancock	121	121:9-122:3	DENY. LP1.
Sen. Hancock	122	122:18-123:1	DENY. LP1.
Sen. Hancock	123	123:23-124:1	DENY. LP1.
Sen. Hancock	124	124:3-124:9	DENY. LP1.
Sen. Hancock	153	153:23-154:1	GRANT. Untimely assertion of legislative privilege. See ECF No. 282 at 4.
Sen. Hancock	164	164:3-164:9	DENY. LP1.
Sen. Hancock	176	176:23-177:5	GRANT. Improper objection.
Sen. Hancock	177	177:6-177:11	DENY. LP1.
Sen. Hancock	177	177:12-177:17	DENY. LP1.
Sen. Hancock	177	177:22-178:2	DENY. LP1.
Sen. Hancock	178	178:20-178:24	DENY. LP1.

Control Number	Custodian	File	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0000001	Anna Mackin	PDF		11/16/2021					Legislative	Compilation of confidential emails exchanged between Ms. Mackin and various members of the Texas Legislature regarding the creation and design of the new electoral maps, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP1.
DOC_0000027	Anna Mackin	DOCX	Sean Opperman (attorney)	10/16/2021					Legislative; Attorney Client	districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements. Includes contributions from counsel retained for the purpose of advising on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0000064	Anna Mackin	PDF							Legislative; Attorney Client; Work Product	districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements. Includes contributions from counsel retained for the purpose of advising on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0000065	Anna Mackin	PDF							Legislative; Attorney Client; Work Product	districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements. Includes contributions from counsel retained for the purpose of advising on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0000066	Anna Mackin	PDF							Legislative; Attorney Client; Work Product	districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements. Includes contributions from counsel retained for the purpose of advising on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0000077	Anna Mackin	DOCX		8/26/2021					Legislative; Attorney Client; Work Product	Calendar entries relating to redistricting, including hearings and meetings with legislators and staffers.	**WITHHOLD.** LP2.
DOC_0000078	Anna Mackin	DOCX		8/26/2021					Legislative; Attorney Client; Work Product	Calendar entries relating to redistricting, including hearings and meetings with legislators and staffers.	**WITHHOLD.** LP2.
DOC_0000081	Anna Mackin	PDF	Sean Opperman (attorney)	8/12/2021	Members of the Senate	Senator Huffman			Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP1.
DOC_0000082	Anna Mackin	PDF		9/17/2021	Members of the Senate	Senator Huffman			Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP1.
DOC_0000084	Anna Mackin	DOCX	Anna Mackin	10/16/2021					Legislative	districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements. Includes contributions from counsel retained for the purpose of advising on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0000086	Anna Mackin	PDF	Chloe Powers (Senate Research Center)	9/11/2021					Legislative	Confidential Senate Research Center analysis of Senate Redistricting Committee hearing, sent to committee members, and kept in Senator Huffman's personal files for the purpose of considering redistricting legislation.	**WITHHOLD.** LP2.
DOC_0000087	Anna Mackin	PDF	Jordan Death (Senate Research Center)	9/8/2021					Legislative	Confidential Senate Research Center analysis of Senate Redistricting Committee hearing, sent to committee members, and kept in Senator Huffman's personal files for the purpose of considering redistricting legislation.	**WITHHOLD.** LP2.
DOC_0000088	Anna Mackin	PDF	Robert Cone (Senate Research Center)	9/8/2021					Legislative	Confidential Senate Research Center analysis of Senate Redistricting Committee hearing, sent to committee members, and kept in Senator Huffman's personal files for the purpose of considering redistricting legislation.	**WITHHOLD.** LP2.
DOC_0000089	Anna Mackin	PDF	Jo Walston (Senate Research Center)	9/11/2021					Legislative	Confidential Senate Research Center analysis of Senate Redistricting Committee hearing, sent to committee members, and kept in Senator Huffman's personal files for the purpose of considering redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0000090	Anna Mackin	PDF	Eleanor White (Senate Research Center)	9/12/2021					Legislative	Confidential Senate Research Center analysis of Senate Redistricting Committee hearing, sent to committee members, and kept in Senator Huffman's personal files for the purpose of considering redistricting legislation.	**WITHHOLD.** LP2.
DOC_0000091	Anna Mackin	PDF	Jordan Death (Senate Research Center)	9/27/2021					Legislative	Confidential Senate Research Center analysis of Senate Redistricting Committee hearing, sent to committee members, and kept in Senator Huffman's personal files for the purpose of considering redistricting legislation.	**WITHHOLD.** LP2.
DOC_0000092	Anna Mackin	PDF	Robert Cone (Senate Research Center)	9/27					Legislative	Confidential Senate Research Center analysis of Senate Redistricting Committee hearing, sent to committee members, and kept in Senator Huffman's personal files for the purpose of considering redistricting legislation.	**WITHHOLD.** LP2.
DOC_0000093	Anna Mackin	PDF	Jordan Death (Senate Research Center)	9/29/2021					Legislative; Attorney Client; Work Product	Confidential Senate Research Center analysis of Senate Redistricting Committee hearing, sent to committee members, and kept in Senator Huffman's personal files for the purpose of considering redistricting legislation.	**WITHHOLD.** LP2.
DOC_0000094	Anna Mackin	PDF	Jo Walston (Senate Research Center)	10/1/2021					Legislative; Attorney Client; Work Product	Confidential Senate Research Center analysis of Senate Redistricting Committee hearing, sent to committee members, and kept in Senator Huffman's personal files for the purpose of considering redistricting legislation.	**WITHHOLD.** LP2.
DOC_0000095	Anna Mackin	PDF	Kenneth Bryan (Senate Research Center)	2/22/2021					Legislative; Attorney Client; Work Product	Confidential Senate Research Center analysis of Senate Redistricting Committee hearing, sent to committee members, and kept in Senator Huffman's personal files for the purpose of considering redistricting legislation.	**WITHHOLD.** LP2.
DOC_0000096	Anna Mackin	PDF	Kenneth Bryan (Senate Research Center)	3/11/2021					Legislative; Attorney Client; Work Product	Confidential Senate Research Center analysis of Senate Redistricting Committee hearing, sent to committee members, and kept in Senator Huffman's personal files for the purpose of considering redistricting legislation.	**WITHHOLD.** LP2.
DOC_0000097	Anna Mackin	PDF	Kenneth Bryan (Senate Research Center)	3/15/2021					Legislative; Attorney Client; Work Product	Confidential Senate Research Center analysis of Senate Redistricting Committee hearing, sent to committee members, and kept in Senator Huffman's personal files for the purpose of considering redistricting legislation.	**WITHHOLD.** LP2.
DOC_0000098	Anna Mackin	PDF	Andrew Robison (Senate Research Center)	3/16/2021					Legislative; Attorney Client; Work Product	Confidential Senate Research Center analysis of Senate Redistricting Committee hearing, sent to committee members, and kept in Senator Huffman's personal files for the purpose of considering redistricting legislation.	**WITHHOLD.** LP2.
DOC_0000101	Anna Mackin	DOCX		8/27/2021					Legislative; Attorney Client; Work Product	Confidential draft retention contract for use in connection with redistricting legislation	**WITHHOLD.** LP2.
DOC_0000105	Anna Mackin	DOCX	Casey Contres (Congressman Tony Gonzales former chief of staff)	10/1/2021					Legislative	Talking points for Senate Redistricting Committee hearing, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions	**WITHHOLD.** LP2.
DOC_0000106	Anna Mackin	PDF	Sean Opperman (attorney)	9/23/2021					Legislative; Attorney Client; Work Product	Attachment to confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0000107	Anna Mackin	PDF	Ashley Brooks (Senator Huffman former legislative director)	8/23/2021					Legislative	Attachment to confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0000108	Anna Mackin	DOCX	Sean Opperman (attorney)	10/3/2021					Legislative; Attorney Client; Work Product	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	**WITHHOLD.** LP2.
DOC_0000116	Anna Mackin	PDF	Ashley Brooks (Senator Huffman former legislative director)	9/10/2021	Members of the Senate	Senator Huffman			Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP1.
DOC_0000117	Anna Mackin	PDF		9/12/2021					Legislative; Attorney Client; Work Product	Confidential invoice for legal services provided in connection with redistricting legislation, given to Senate Redistricting Committee Staff.	**WITHHOLD.** LP2.

Control Number	Custodian	File	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0000118	Anna Mackin	PDF		10/7/2021					Legislative; Attorney Client; Work Product	Confidential invoice for legal services provided in connection with redistricting legislation, given to Senate Redistricting Committee Staff.	**WITHHOLD.** LP2.
DOC_0000129	Anna Mackin	PDF		9/14/2021					Legislative; Attorney Client; Work Product	Confidential draft retention contract for use in connection with redistricting legislation	**WITHHOLD.** LP2.
DOC_0000132	Anna Mackin	PDF	Eric Sebree (Texas House of Representatives IT)	8/24/2021					Legislative	Attachment to confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0000133	Anna Mackin	PDF		10/7/2021					Legislative	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	**WITHHOLD.** LP2.
DOC_0000134	Anna Mackin	PDF		10/7/2021					Legislative	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	**WITHHOLD.** LP2.
DOC_0000135	Anna Mackin	PDF		10/7/2021					Legislative	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	**WITHHOLD.** LP2.
DOC_0000139	Anna Mackin	PDF		10/1/2021					Legislative	Confidential draft of redistricting legislation, relating to proposed districts, reflecting and implicating legislative privileged thoughts, opinions, and mental	**WITHHOLD.** LP1.
DOC_0000140	Anna Mackin	PDF		10/1/2021					Legislative	Confidential draft of redistricting legislation, relating to proposed districts, reflecting and implicating legislative privileged thoughts, opinions, and mental	**WITHHOLD.** LP1.
DOC_0000141	Anna Mackin	PDF		10/1/2021					Legislative	Confidential draft of redistricting legislation, relating to proposed districts, reflecting and implicating legislative privileged thoughts, opinions, and mental	**WITHHOLD.** LP1.
DOC_0000142	Anna Mackin	PDF		10/1/2021					Legislative	Confidential draft of redistricting legislation, relating to proposed districts, reflecting and implicating legislative privileged thoughts, opinions, and mental	**WITHHOLD.** LP1.
DOC_0000143	Anna Mackin	PDF		10/8/2021					Legislative	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	**WITHHOLD.** LP2.
DOC_0000144	Anna Mackin	PDF		10/8/2021					Legislative	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	**WITHHOLD.** LP2.
DOC_0000145	Anna Mackin	PDF		10/8/2021					Legislative	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	**WITHHOLD.** LP2.
DOC_0000146	Anna Mackin	PDF		10/8/2021					Legislative	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	**WITHHOLD.** LP2.
DOC_0000147	Anna Mackin	PDF		10/8/2021					Legislative	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	**WITHHOLD.** LP2.
DOC_0000175	Anna Mackin	PDF	Alethe Lila Valencia (Texas Demographic Center)	2/5/2021					Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.

Control Number	Custodian	File	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0000182	Anna Mackin	PDF		9/26/2021					Legislative	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	**WITHHOLD.** LP2.
DOC_0000183	Anna Mackin	PDF		9/30/2021					Legislative	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	**WITHHOLD.** LP2.
DOC_0000184	Anna Mackin	PDF		10/4/2021					Legislative	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	**WITHHOLD.** LP2.
DOC_0000195	Anna Mackin	PDF		8/5/2021					Legislative	Confidential invoice for legal services provided in connection with redistricting legislation, given to Senate Redistricting Committee Staff.	**WITHHOLD.** LP2.
DOC_0000197	Anna Mackin	PDF		9/27/2021					Legislative	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	**WITHHOLD.** LP2.
DOC_0000198	Anna Mackin	PDF		9/27/2021					Legislative	Confidential draft of redistricting legislation, relating to proposed districts, reflecting and implicating legislative privileged thoughts, opinions, and mental	**WITHHOLD.** LP1.
DOC_0000199	Anna Mackin	DOCX	Sean Opperman (attorney)	10/16/2021					Legislative; Attorney Client	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	**WITHHOLD.** LP2.
DOC_0000210	Anna Mackin	DOCX		8/30/2021					Legislative	Calendar entries relating to redistricting, including hearings and meetings with legislators and staffers.	**WITHHOLD.** LP2.
DOC_0000213	Anna Mackin	PDF		4/13/2021					Legislative; Attorney Client; Work Product	Governor Patrick and Senator Huffman, setting forth scope of representation and describing related redistricting legal issues, made for the purpose of facilitating the rendition of legal advice regarding redistricting litigation. The retention of Lehotsky Kelly and the firm's scope of work also reveals mental impressions on legislative process and policy.	**WITHHOLD.** LP2.
DOC_0000214	Anna Mackin	PDF	Erica Sebree (Texas House of Representatives IT)	8/24/2021					Legislative	Attachment to confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0000216	Anna Mackin	PDF							Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP1.
DOC_0000217	Anna Mackin	PDF		9/8/2021					Legislative; Attorney Client; Work Product	Confidential draft retention contract for use in connection with redistricting legislation	**WITHHOLD.** LP2.
DOC_0000218	Anna Mackin	PDF		9/8/2021					Legislative	Confidential draft retention contract for use in connection with redistricting legislation	**WITHHOLD.** LP2.
DOC_0000219	Anna Mackin	PDF		9/13/2021					Legislative	Confidential draft retention contract for use in connection with redistricting legislation	**WITHHOLD.** LP2.
DOC_0000220	Anna Mackin	DOCX		8/31/2021					Legislative	Confidential draft retention contract for use in connection with redistricting legislation	**WITHHOLD.** LP2.
DOC_0000267	Anna Mackin	DOCX	Anna Mackin (attorney)	10/17/2021					Legislative; Attorney Client; Work Product	Summary of proposed redistricting legislation relating to proposed districts, prepared by Anna Mackin (attorney) for Senator Huffman's use in considering redistricting legislation, reflecting and implicating legislative and attorney privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0000269	Anna Mackin	DOCX	Anna Mackin (attorney)	10/5/2021					Legislative; Attorney Client; Work Product	Talking points for Senate Redistricting Committee hearing, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions	**WITHHOLD.** LP2.

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Control Number	Custodian	File	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0000270	Anna Mackin	DOCX	Anna Mackin (attorney)	10/7/2021					Legislative; Attorney Client; Work Product	Summary of proposed redistricting legislation relating to proposed districts, prepared by Anna Mackin (attorney) for Senator Huffman's use in considering redistricting legislation, reflecting and implicating legislative and attorney privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0000271	Anna Mackin	DOCX	Sean Opperman (attorney)	10/5/2021					Legislative; Attorney Client; Work Product	Talking points for Senate Redistricting Committee hearing, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions	**WITHHOLD.** LP2.
DOC_0000273	Anna Mackin	DOCX	Anna Mackin (attorney)	10/16/2021					Legislative; Attorney Client; Work Product	Summary of proposed redistricting legislation relating to proposed districts, prepared by Anna Mackin (attorney) for Senator Huffman's use in considering redistricting legislation, reflecting and implicating legislative and attorney privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0000274	Anna Mackin	DOCX	Anna Mackin (attorney)	10/12/2021					Legislative	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	**WITHHOLD.** LP2.
DOC_0000277	Anna Mackin	DOCX	Anna Mackin (attorney)	9/30/2021					Legislative	Typed notes regarding redistricting legislation relating to proposed districts, kept for the purpose of considering redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0000280	Anna Mackin	DOCX	Anna Mackin (attorney)	10/17/2021					Legislative; Attorney Client	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements	**WITHHOLD.** LP2.
DOC_0000293	Anna Mackin	DOCX	Anna Mackin (attorney)	9/29/2021					Legislative; Attorney Client; Work Product	Talking points for Senate Redistricting Committee hearing, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions	**WITHHOLD.** LP2.
DOC_0000305	Anna Mackin	DOCX	Anna Mackin (attorney)	9/29/2021					Legislative; Attorney Client; Work Product	Talking points for Senate Redistricting Committee hearing, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions	**WITHHOLD.** LP2.
DOC_0000306	Anna Mackin	DOCX	Anna Mackin (attorney)	9/24/2021					Legislative; Attorney Client; Work Product	Talking points for Senate Redistricting Committee hearing, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions	**WITHHOLD.** LP2.
DOC_0000344	Anna Mackin	DOCX	Jackson (Senator Huffman former general counsel)	7/16/2021					Legislative; Attorney Client; Work Product	Draft schedule for the redistricting process, prepared for Senator Huffman by Anna Mackin (attorney), reflecting and implicating legislative privileged thoughts, opinions, and mental impressions, as well as attorney advice and mental impressions.	**WITHHOLD.** LP2.
DOC_0000345	Anna Mackin	DOCX	Jackson (Senator Huffman former general counsel)	7/19/2021					Legislative; Attorney Client; Work Product	Draft schedule for the redistricting process, prepared for Senator Huffman by Anna Mackin (attorney), reflecting and implicating legislative privileged thoughts, opinions, and mental impressions, as well as attorney advice and mental impressions.	**WITHHOLD.** LP2.
DOC_0000346	Anna Mackin	DOCX	Jackson (Senator Huffman former general counsel)	7/21/2021					Legislative; Attorney Client; Work Product	Draft schedule for the redistricting process, prepared for Senator Huffman by Anna Mackin (attorney), reflecting and implicating legislative privileged thoughts, opinions, and mental impressions, as well as attorney advice and mental impressions.	**WITHHOLD.** LP2.
DOC_0000349	Anna Mackin	DOCX	Jackson (Senator Huffman former general counsel)	5/7/2021					Legislative; Attorney Client; Work Product	Draft schedule for the redistricting process, prepared for Senator Huffman by Anna Mackin (attorney), reflecting and implicating legislative privileged thoughts, opinions, and mental impressions, as well as attorney advice and mental impressions.	**WITHHOLD.** LP2.
DOC_0000350	Anna Mackin	DOCX	Jackson (Senator Huffman former general counsel)	7/16/2021					Legislative; Attorney Client; Work Product	Draft schedule for the redistricting process, prepared for Senator Huffman by Anna Mackin (attorney), reflecting and implicating legislative privileged thoughts, opinions, and mental impressions, as well as attorney advice and mental impressions.	**WITHHOLD.** LP2.
DOC_0000351	Anna Mackin	DOCX	Sean Opperman (attorney)	8/26/2021					Legislative; Attorney Client; Work Product	Draft schedule for the redistricting process, prepared for Senator Huffman by Anna Mackin (attorney), reflecting and implicating legislative privileged thoughts, opinions, and mental impressions, as well as attorney advice and mental	**WITHHOLD.** LP2.

Control Number	Custodian	File	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0000353	Anna Mackin	DOCX	Anna Mackin (attorney)	1/29/2021					Legislative; Attorney Client; Work Product	Draft schedule for the redistricting process, prepared for Senator Huffman by Anna Mackin (attorney), reflecting and implicating legislative privileged thoughts, opinions, and mental impressions, as well as attorney advice and mental	**WITHHOLD.** LP2.
DOC_0000372	Anna Mackin	MSG		1/9/2021	Sean Opperman (attorney)	Jeff Archer (TLC)	Anna Mackin (attorney); Karina Davis		Legislative; Attorney Client; Work Product	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0000376	Anna Mackin	MSG		1/22/2021	Alexander Hammond; Amy Lane; Angus Lupton; Anna Barnett; Anna Mackin (attorney); Britton Davis; Caity Jackson; Carrie Smith; Cody Terry; Deisy Jaimes; Doug Clements; Drew Tedford; Glen Austin; Grecia Galvan; Jason Kirksey; Koy Kunkel; Lara Wendler; Luis Moreno; Marc Salvato; Mathew Dowling; Paul Emerson; Pearl Cruz; Randy Samuelson; Ruben O'Bell; Rudy England; Ryan Alter; Shari Shivers; Shelby Corine; Stacey Chamberlin; Sushma Smith; Tomas Larralde; Tony Wen	Sean Opperman (attorney)			Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0000377	Anna Mackin	PDF	Ashley Brooks (Senator Huffman former legislative director)	1/22/2021					Legislative	Attachment to confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0000378	Anna Mackin	PDF	Anna Mackin (attorney)	1/22/2021					Legislative	Attachment to confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0000379	Anna Mackin	PDF	Josh Hillery (Senator Huffman former communications director)	1/21/2021					Legislative	Attachment to confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0000955	Anna Mackin	MSG		12/21/2020	Senate	Sean Opperman (attorney)			Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0000965	Anna Mackin	MSG		1/11/2021	Alexander Hammond; Amy Lane; Angus Lupton; Anna Barnett; Cari Christman; Carrie Smith; Chris Stenbach; Cody Terry; Dave Nelson; Deisy Jaimes; Drew Graham; Garry Jones; Ginny Bell; Johanna Kim; Jorge Ramirez; Josh Reyna; Lajuana D. Barton; Lara Wendler; Luis Moreno; Marc Salvato; Margaret Frain- Wallace; Mathew Dowling; Peter Einhorn; Randy Samuelson; Robert Borja; Ruben O'Bell; Stacey Chamberlin; Tara Garcia; Terry Franks; Tomas	Sean Opperman (attorney)	Anna Mackin (attorney)		Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.

Control Number	Custodian	File	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0000972	Anna Mackin	MSG		1/15/2021	Alexander Hammond; Angus Lupton; Anna Barnett; Anna Mackin (attorney); Benjamin Barkley; Caity Jackson; Carrie Smith; Cody Terry; Deisy Jaimes; Doug Clements; Ginny Bell; Glen Austin; Grecia Galvan; Jason Kirksey; Koy Kunkel; Lara Wendler; Luis Moreno; Marc Salvato; Mathew Dowling; Paul Emerson; Pearl Cruz; Randy Samuelson; Ruben O'Bell; Ryan Alter; Shari Shivers; Shelby Corine; Stacey Chamberlin; Tomas Larralde.	Sean Opperman (attorney)			Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0000973	Anna Mackin	MSG		1/17/2021	Patsy Spaw; Ranna Davis; Scott Caffey; Charnetha Grayson; Joel Griebel; Jeff Archer (TLC); Jill Turetsky; Tim Beto; Ty Liddell	Sea Opperman (attorney)	Anna Mackin (attorney); Koy Kunkel		Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0000974	Anna Mackin	DOCX	Sean Opperman (attorney)	1/17/2021					Legislative; Attorney Client; Work Product	Attachment to confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0000975	Anna Mackin	MSG		1/17/2021	Anna Mackin (attorney)	Sean Opperman (attorney)			Legislative; Attorney Client; Work Product	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0001064	Anna Mackin	MSG		9/11/2021	Anna Mackin (attorney)	Jared May (TLC)			Legislative; Attorney Client; Work Product	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0001065	Anna Mackin	TXT							Legislative	Attachment to confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions	**WITHHOLD.** LP2.
DOC_0001080	Anna Mackin	MSG		10/16/2021	Anna Mackin (attorney)	Sean Opperman (attorney)			Legislative; Attorney Client; Work Product	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0001108	Anna Mackin	MSG		2/24/2021	Angus Lupton; Anna Barnett; Anna Mackin (attorney); Britton Davis; Caity Jackson; Carrie Smith; Cody Terry; Deisy Jaimes; Doug Clements; Drew Tedford: Grecia Galvan; Jason Kirksey; Kenneth Bryan; Koy Kunkel; Lara Wendler; Lauren Cacheaux; Luis Moreno; Marc Salvato; Mathew Dowling; Paul Emerson; Pearl Cruz; Randy Samuelson; Ruben O'Bell; Rudy England; Ryan Alter; Shelby Corine; Stacey Chamberlin; Sushma Smith; Tomas Larralde; Tony Wen.	Sean Opperman (attorney)			Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001109	Anna Mackin	PDF	Anna Mackin (attorney)	2/24/2021					Legislative	Attachment to confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions	**WITHHOLD.** LP2.

Control Number	Custodian	File	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0001164	Anna Mackin	MSG		9/7/2021	Alexander Hammond; Andrew Hendrickson; Angus Lupton; Anna Barnett; Anna Mackin (attorney); Bryan Dunaway; Carrie Smith; Cody Terry; Doug Clements; Drew Tedford; Grecia Galvan; Jason Kirksey; Jorge Ramirez; Kenneth Bryan; Lara Wendler; Luis Moreno; Marc Salvato; Mathew Dowling; Paul Emerson; Randy Samuelson; Ruben O'Bell; Ryan Alter; Shelby Corine; Stacey Chamberlin; Sushma Smith; Taylor Borer	Sean Opperman (attorney)			Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001165	Anna Mackin	PDF	Anna Mackin (attorney)	8/20/2021					Legislative	Attachment to confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_ 0001166	Anna Mackin	MSG		1/24/2021	Alexander Hammond; Andrew Hendrickson; Angus Lupton; Anna Barnett; Anna Mackin (attorney); Britton Davis; Caity Jackson; Carrie Smith; Cody Terry; Deisy Jaimes; Doug Clements; Drew Tedford; Glen Austin; Grecia Galvan; Jason Kirksey; Koy Kunkel; Lara Wendler; Luis Moreno; Marc Salvator; Mathew Dowling; Paul Emerson; Pearl Cruz; Randy Samuelson; Ruben O'Bell; Rudy England; Ryan Alter; Shari Shivers; Shelby Corine; Stacey Chamberlin; Sushma Smith; Tomas Larralde; Tony Wen	Sean Opperman (attorney)			Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001167	Anna Mackin	PDF	Anna Mackin (attorney)	1/22/2021					Legislative	Attachment to confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001168	Anna Mackin	MSG		1/23/2021	Alexander Hammond; Andrew Hendrickson; Angus Lupton; Anna Barnett; Anna Mackin (attorney); Britton Davis; Caity Jackson; Carrie Smith; Cody Terry; Deisy Jaimes; Doug Clements; Drew Tedford; Glen Austin; Grecia Galvan; Jason Kirksey; Koy Kunkel; Lara Wendler; Luis Moreno; Marc Salvato; Mathew Dowling; Paul Emerson; Pearl Cruz; Randy Samuelson; Ruben O'Bell; Rudy England; Ryan Alter; Shari Shivers; Shelby Corine; Stacey Chamberlin; Sushma Smith; Tomas Larralde; Tony Wen	Sean Opperman (attorney)			Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001170	Anna Mackin	MSG		1/22/2021	Alexander Hammond; Andrew Hendrickson; Angus Lupton; Anna Barnett; Anna Mackin (attorney); Britton Davis; Caity Jackson; Carrie Smith; Cody Terry; Deisy Jaimes; Doug Clements; Drew Tedford; Glen Austin; Grecia Galvan; Jason Kirksey; Koy Kunkel; Lara Wendler; Luis Moreno; Marc Salvato; Mathew Dowling; Paul Emerson; Pearl Cruz; Randy Samuelson; Ruben O'Bell; Rudy England; Ryan Alter; Shari Shivers; Shelby Corine; Stacey Chamberlin; Sushma Smith; Tomas Larralde; Tony Wen	Sean Opperman (attorney)			Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.

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Control Number	Custodian	File	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0001171	Anna Mackin	MSG		4/22/2021	Anna Mackin (attorney)	Sean Opperman (attorney)			Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001173	Anna Mackin	MSG		4/13/2021	Scott Keller (attorney)	Darrel Davila	Chris Sterner (attorney); Alix Morris (Attorney); Sean Opperman (attorney); Anna Mackin (attorney); Todd Disher		Legislative; Attorney Client; Work Product	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0001175	Anna Mackin	MSG		6/10/2021	Anna Mackin (attorney)	Jared May (TLC)			Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001186	Anna Mackin	MSG		2/17/2021	Angus Lupton; Anna Barnett; Anna Mackin (attorney); Britton Davis; Caity Jackson; Carrie Smith; Cody Terry; Deisy Jackson; Doug Clements; Drew Tedford; Grecia Galvan; Jason Kirksey; Kenneth Bryan; Koy Kunkel; Lara Wendler; Lauren Cacheaux; Luis Moreno; Marc Salvato; Mathew Dowling; Paul Emerson; Pearl Cruz; Randy Samuelson; Ruben O'Bell; Rudy England; Ryan Alter; Shelby Corine; Stacey Chamberlin; Sushma Smith; Tomas Larralde; Tony Wen	Sean Opperman (attorney)			Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001189	Anna Mackin	MSG		2/15/2021	Angus Lupton; Anna Barnett; Anna Mackin (attorney); Britton Davis; Caity Jackson; Carrie Smith; Cody Terry; Deisy Jaimes; Doug Clements; Drew Tedford; Grecia Galvan; Jason Kirksey; Kenneth Bryan; Koy Kunkel; Lara Wendler; Lauren Cacheaux; Luis Moreno; Marc Salvato; Mathew Dowling; Paul Emerson; Pearl Cruz; Randy Samuelson; Ruben O'bell; Rudy England; Ryan Alter; Shelby Corine; Stacey Chamberlin; Sushma Smith; Tomas Larralde; Tony Wen.	Sean Opperman (attorney)			Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001190	Anna Mackin	MSG		2/8/2021	Angus Lupton; Anna Barnett; Anna Mackin (attorney); Britton Davis; Caity Jackson; Carrie Smith; Cody Terry; Deisy Jaimes; Doug Clements; Drew Tedford; Glen Austin; Grecia Galvan; Jason Kirksey; Kenneth Bryan; Koy Kunkel; Lara Wendler; Lauren Cacheaux; Luis Moreno; Marc Salvato; Mathew Dowling; Paul Emerson; Pearl Cruz; Randy Samuelson; Ruben O'Bell; Ruby England; Ryan Alter; Shelby Corine; Stacey Chamberlin; Sushma Smith; Tomas Larralde; Tony Wen	Sean Opperman (attorney)			Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.

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Control Number	Custodian	File	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0001198	Anna Mackin	MSG		3/1/2021	Angus Lupton; Anna Barnett; Anna Mackin (attorney); Britton Davis; Caity Jackson; Carrie Smith; Cody Terry; Deisy Jaimes; Doug Clements; Drew Tedford; Grecia Galvan; Jason Kirksey; Kenneth Bryan; Koy Kunkel; Lara Wendler; Lauren Cacheaux; Luis Moreno; Marc Salvato; Mathew Dowling; Paul Emerson; Pearl Cruz; Randy Samuelson; Ruben O'bell; Rudy England; Ryan Alter; Shelby Corine; Stacey Chamberlin; Sushma Smith; Tomas Larralde; Tony Wen.	Sean Opperman (atto rney)			Legislative	Confidential communication regarding communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001200	Anna Mackin	PDF	Anna Mackin (Attorney)	3/1/2021					Legislative	Attachment to confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001204	Anna Mackin	MSG		3/27/2021	Angus Lupton; Anna Barnett; Anna Mackin (attorney); Britton Davis; Caity Jackson; Carrie Smith; Cody Terry; Deisy Jaimes; Doug Clements; Drew Tedford; Grecia Galvan; Jason Kirksey; Kenneth Bryan; Koy Kunkel; Lara Wendler; Lauren Cacheaux; Luis Moreno; Marc Salvato; Mathew Dowling; Paul Emerson; Pearl Cruz; Randy Samuelson; Ruben O'Bell; Rudy England; Ryan Alter; Shelby Corine; Stacey Chamberlin; Sushma Smith; Tomas Larralde; Tony Wen	Sean Opperman (Att orney)			Legislative; Attorney Client; Work Product	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0001229	Anna Mackin	MSG		6/21/2022	Darrel Davila; Chris Sterner (attorney); Sean Opperman (attorney); Anna Mackin (attorney)	Scott Keller (attorney)	Steve Lehotsky		Attorney Client	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	
DOC_0001244	Anna Mackin	MSG		7/29/2021	Angus Lupton; Anna Barnett; Anna Mackin (attorney); Britton Davis; Caity Jackson; Carrie Smith; Cody Terry; Deisy Jaimes; Doug Clements; Drew Tedford; Grecia Galvan; Jason Kirksey; Kenneth Bryan; Koy Kunkel; Lara Wendler; Lauren Cacheaux; Luis Moreno; Marc Salvato; Mathew Dowling; Paul Emerson; Pearl Cruz; Randy Samuelson; Ruben O'Bell; Rudy England; Ryan Alter; Shelby Corine; Stacey Chamberlin; Sushma Smith; Tomas Larralde; Tony Wen	Sean Opperman (Att orney)			Legislative; Attorney Client; Work Product	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0001250	Anna Mackin	MSG		8/12/2021	Alexander Hammond; Amy Lenz; Angus Lupton; Anna Barnett; Cari Christman; Carrie Smith; Chris Steinbach; Cody Terry; Dave Nelson; Deisy Jaimes; Drew graham; Garry Jones; Johanna Kim; Jorge Ramirez; Josh Reyna; Lajuana D. Barton; Lara Wendler; Luis Moreno; Marc Salvato; Margaret Wallace; Mathew Dowling; Pearl Cruz; Peter Einhorn; Randy Samuelson; Robert Borja; Ruben O'Bell; Stacey Chamberlin; Tara Clements; Terry Franks.	Sean Opperman (Attorney)	Anna Mackin (attorney)		Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001252	Anna Mackin	MSG		8/16/2021	Sean Opperman (attorney); Anna Mackin (attorney)	Jared May (TLC)			Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001256	Anna Mackin	MSG		8/19/2021	Aaron Harris; Alexander Hammond; Angus Lupton; Anna Barnett; Anna Mackin (attorney); Britton Davis; Bryan Dunaway; Caity Jackson; Carrie Smith; Cody Terry; Daisy jaimesl Doug Clements; Drew Tedford; Grecia Galvan; Jason Kirksey; Kenneth Bryan; Lara Wendler; Luis Moreno; Marc Salvato; Mathew Dowling; Paul Emerson; Pearl Cruz; Randy Samuelson; Ruben O'Bell; Rudy England; Ryan Alter; Shelby Corine; Stacey Chamberlin; Sushma	Sean Opperman (Attorney)			Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001258	Anna Mackin	MSG		8/23/2021	Alexander Hammond; Angus Lupton; Anna Barnett; Anna Mackin (attorney); Britton Davis; Bryan Dunaway; Carrie Smith; Cody Terry; Deisy jaimes; Doug Clements; Drew Tedford; Grecia Galvan; Jason Kirksey; Kenneth Bryan; Lara Wendler; Luis Moreno; Marc Salvato; Mathew Dowling; Paul Emerson; Pearl Cruz; Randy Samuelson; Ruben O'Bell; Rudy England; Ryan Alter; Shelby Corine; Stacey Chamberlin; Sushma Smith; Taylor Borer.	Sean Opperman (Attorney)			Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001259	Anna Mackin	PDF		8/23/2021	Ashley Brooks (Senator Huffman former legislative director)				Legislative	Attachment to confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001260	Anna Mackin	PDF		8/20/2021	Anna Mackin (attorney)				Legislative	Attachment to confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions	**WITHHOLD.** LP2.
DOC_0001264	Anna Mackin	PDF		8/24/2021	Erica Sebree (Texas House of Representatives IT)				Legislative	Attachment to confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001265	Anna Mackin	PDF		8/24/2021	Erica Sebree (Texas House of Representatives IT)				Legislative	Attachment to confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001268	Anna Mackin	MSG		8/27/2021	Gardner Pate; Jeff Oldham (attorney); Courtney Hjaltman; Angela Colmenero	Sean Opperman (attorney)	Anna Mackin (attorney)		Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.

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Control Number	Custodian	File	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0001269	Anna Mackin	DOCX		8/26/2021					Legislative	Calendar entries relating to redistricting, including hearings. and meetings with legislators and staffers.	**WITHHOLD.** LP2.
DOC_0001270	Anna Mackin	DOCX		8/26/2021					Legislative	Calendar entries relating to redistricting, including hearings. and meetings with legislators and staffers.	**WITHHOLD.** LP2.
DOC_0001271	Anna Mackin	MSG		8/30/2021	Gardner Pate; Jeff Oldham (attorney); Courtney Hjaltman; Angela Colmenaro (attorney).	Sean Opperman (attorney)	Anna Mackin		Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001272	Anna Mackin	DOCX		8/30/2021					Legislative	Calendar entries relating to redistricting, including hearings. and meetings with legislators and staffers.	**WITHHOLD.** LP2.
DOC_0001273	Anna Mackin	MSG		8/30/2021	Sean Opperman (attorney)	Karina Davis	Anna Mackin (attorney)		Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001276	Anna Mackin	MSG		9/3/2021	Alexander Hammond; Andrew Hendrickson Angus Lupton; Anna Barnett; Anna Mackin (attorney); Britton Davis; Bryan Dunaway; Carrie Smith; Cody Terry; Deisy Jaimes; Doug Clements; Drew Tedford; Grecia Galvan; Jason Kirksey; Kenneth Bryan; Lara Wendler; Luis Moreno; Marc Salvato; Mathew Dowling; Paul Emerson; Pearl Cruz; Randy Samuelson; Ruben O'Bell; Rudy England; Ryan Alter; Shelby Corine; Stacey Chamberlin; Sushma Smith; Taylor Borer.	Sean Opperman (attorney)			Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001277	Anna Mackin	PDF	Anna Mackin (attorney)	8/20/2021					Legislative	Attachment to confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001283	Anna Mackin	MSG		9/8/2021	Anna Mackin (attorney)	Brad Lockerbie (consultant)			Legislative	Confidential communication regarding draft redistricting legislation , reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001284	Anna Mackin	PDF		9/8/2021					Legislative	Confidential draft retention contract for use in connection with redistricting legislation	**WITHHOLD.** LP2.
DOC_0001285	Anna Mackin	MSG		9/8/2021	Anna Mackin (attorney)	Brad Lockerbie (consultant)			Legislative	Confidential communication regarding draft redistricting legislation , reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001286	Anna Mackin	PDF		9/8/2021					Legislative	Confidential draft retention contract for use in connection with redistricting legislation	**WITHHOLD.** LP2.
DOC_0001287	Anna Mackin	MSG		9/10/2021	Alexander Hammond; Andrew Hendrickson Angus Lupton; Anna Barnett; Anna Mackin (attorney); Bryan Dunaway; Carrie Smith; Cody Terry; Doug Clements; Drew Tedford; Grecia Galvan; Jason Kirksey; Jorge Ramirez; Lara Wendler; Luis Moreno; Marc Salvato; Mathew Dowling; Paul Emerson; Randy Samuelson; Ruben O'Bell; Ryan Alter; Shelby Corine; Stacey Chamberlin; Sushma Smith; Taylor Borer.	Sean Opperman (attorney)			Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001289	Anna Mackin	MSG		9/13/2021	Anna Mackin (attorney)	Chris Sterner (attorney)	Sean Opperman (attorney); Darrel Davila; Alix Morris (attorney)		Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001292	Anna Mackin	MSG		9/14/2021	Anna Mackin (attorney)	Kimberly Shields	Jeff Archer (TLC); Jon Heining		Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.

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Control Number	Custodian	File	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0001320	Anna Mackin	NA		Alexander Hammond; Andrew Hendrickson; Angus Lupton; Anna Barnett; Anna Mackin (attorney); Bryan Dunaway; Carrie Smith; Cody Terry; Doug Clements; Drew Tedford; Grecia Galvan; Jason Kirksey; Jorge Ramirez; Kenneth Bryan; Lara Wendler; Luis Moreno; Marc Salvato; Mathew Dowling; Paul Emerson; Randy Samuelson; Ruben O'Bell; Ryan Alter; Shelby Corine; Stacey Chamberlin; Sushma Smith; Taylor	Sean Opperman (attorney)				Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001321	Anna Mackin	MSG		9/20/2021	Alexander Hammond; Andrew Hendrickson Angus Lupton; Anna Barnett; Anna Mackin (attorney); Bryan Dunaway; Carrie Smith; Cody Terry; Doug Clements; Drew Tedford; Grecia Galvan; Jason Kirksey; Jorge Ramirez; Lara Wendler; Luis Moreno; Marc Salvato; Mathew Dowling; Paul Emerson; Randy Samuelson; Ruben O'Bell; Ryan Alter; Shelby Corine; Stacey Chamberlin; Sushma Smith; Taylor Borer.	Sean Opperman (attorney)			Legislative	Confidential communication regarding draft redistricting legislation; reflecting and implicating legislative privileged thoughts, opinions, and mental impressions	**WITHHOLD.** LP2.
DOC_0001326	Anna Mackin	MSG		9/19/2021	Anna Mackin (attorney); Sean Opperman (attorney)	Wendy Underhill	Ben Williams		Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001335	Anna Mackin	MSG		9/23/2021	Alexander Hammond; Andrew Hendrickson; Angus Lupton; Anna Barnett; Anna Mackin (attorney); Bryan Dunaway; Carrie Smith; Cody Terry; Doug Clements; Drew Tedford; Grecia Galvan; Jason Kirksey; Jorge Ramirez; Lara Wendler; Luis Moreno; Marc Salvato; Mathew Dowling; Paul Emerson; Randy Samuelson; Ruben O'Bell; Ryan Alter; Shelby Corine; Stacey Chamberlin; Sushma Smith; Taylor Borer.	Sean Opperman (attorney)			Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.

Control Number	Custodian	File	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0001344	Anna Mackin	MSG		9/27/2021	Alexander Hammond; Andrew Hendrickson; Angus Lupton; Anna Barnett; Anna Mackin (attorney); Bryan Dunaway; Carrie Smith; Cody Terry; Doug Clements; Drew Tedford; Grecia Galvan; Jason Kirksey; Jorge Ramirez; Kenneth Bryan; Lara Wendler; Luis Moreno; Mark salvato; Mathew Dowling; Paul Emerson; Randy Samuelson; Ruben O'Bell; Ryan Alter; Shelby Corine; Stacey Chamberlin; Sushma Smith; Taylor Borer	Sean Opperman (attorney)			Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001346	Anna Mackin	MSG		9/27/2021	Sean Opperman (attorney); Anna Mackin (attorney)	Jared May (TLC)			Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions	**WITHHOLD.** LP2.
DOC_0001350	Anna Mackin	MSG		9/27/2021	Jared May (TLC); Anna Mackin (attorney)	Sean Opperman (attorney)			Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001352	Anna Mackin	MSG		9/27/2021	Alexander Hammond; Andrew Hendrickson; Angus Lupton; Anna Barnett; Anna Mackin (attorney); Bryan Dunaway; Carrie Smith; Cody Terry; Doug Clements; Drew Tedford; Grecia Galvan; Jason Kirksey; Jorge Ramirez; Kenneth Bryan; Lara Wendler; Luis Moreno; Mark salvato; Mathew Dowling; Paul Emerson; Randy Samuelson; Ruben O'Bell; Ryan Alter; Shelby Corine; Stacey Chamberlin; Sushma Smith; Taylor Borer	Sean Opperman (attorney)			Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001356	Anna Mackin	MSG		9/26/2021	Sean Opperman (attorney); Anna Mackin (attorney)	Jared May (TLC)			Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions	**WITHHOLD.** LP2.
DOC_0001358	Anna Mackin	PDF		9/26/2021					Legislative	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	**WITHHOLD.** LP2.
DOC_0001359	Anna Mackin	MSG		9/26/2021	Alexander Hammond; Andrew Hendrickson; Angus Lupton; Anna Barnett; Anna Mackin (attorney); Bryan Dunaway; Carrie Smith; Cody Terry; Doug Clements; Drew Tedford; Grecia Galvan; Jason Kirksey; Jorge Ramirez; Kenneth Bryan; Lara Wendler; Luis Moreno; Marc Salvato; Mathew Dowling; Paul Emerson; Randy Samuelson; Ruben O'Bell; Ryan Alter; Shelby Corine; Stacey Chamberlin; Sushma Smith;	Sean Opperman (attorney)			Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.

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Control Number	Custodian	File	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0001360	Anna Mackin	MSG		9/27/2021	Alexander Hammond; Andrew Hendrickson; Angus Lupton; Anna Barnett; Anna Mackin (attorney); Bryan Dunaway; Carrie Smith; Cody Terry; Doug Clements; Drew Tedford; Grecia Galvan; Jason Kirksey; Jorge Ramirez; Kenneth Bryan; Lara Wendler; Luis Moreno; Marc Salvato; Mathew Dowling; Paul Emerson; Randy Samuelson; Ruben O'Bell; Ryan Alter; Shelby Corine; Stacey Chamberlin; Sushma Smith; Taylor Borer	Sean Opperman (attorney)			Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions	**WITHHOLD.** LP2.
DOC_ 0001362	Anna Mackin	MSG		9/27/2021	Alexander Hammond; Andrew Hendrickson; Angus Lupton; Anna Barnett; Anna Mackin (attorney); Bryan Dunaway; Carrie Smith; Cody Terry; Doug Clements; Drew Tedford; Grecia Galvan; Jason Kirksey; Jorge Ramirez; Kenneth Bryan; Lara Wendler; Luis Moreno; Marc Salvato; Mathew Dowling; Paul Emerson; Randy Samuelson; Ruben O'Bell; Ryan Alter; Shelby Corine; Stacey Chamberlin; Sushma Smith; Taylor Borer	Sean Opperman (attorney)			Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001364	Anna Mackin	MSG		9/27/2021	Alexander Hammond; Andrew Hendrickson; Angus Lupton; Anna Barnett; Anna Mackin (attorney); Bryan Dunaway; Carrie Smith; Cody Terry; Doug Clements; Drew Tedford; Grecia Galvan; Jason Kirksey; Jorge Ramirez; Kenneth Bryan; Lara Wendler; Luis Moreno; Marc Salvato; Mathew Dowling; Paul Emerson; Randy Samuelson; Ruben O'Bell; Ryan Alter; Shelby Corine; Stacey Chamberlin; Sushma Smith; Taylor Borer	Sean Opperman (attorney)			Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions	**WITHHOLD.** LP2.
DOC_0001372	Anna Mackin	MSG		9/28/2021	Sean Opperman (attorney)	Molly K Spratt	Anna Mackin (attorney)		Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001377	Anna Mackin	MSG		9/28/2021	Alexander Hammond; Andrew Hendrickson; Angus Lupton; Anna Barnett; Anna Mackin (attorney); Bryan Dunaway; Carrie Smith; Cody Terry; Doug Clements; Drew Tedford; Grecia Galvan; Jason Kirksey; Jorge Ramirez; Kenneth Bryan; Lara Wendler; Luis Moreno; Marc Salvato; Mathew Dowling; Paul Emerson; Randy Samuelson; Ruben O'Bell; Ryan Alter; Shelby Corine; Stacey Chamberlin; Sushma Smith; Taylor Borer	Sean Opperman			Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.

ECF No. 582

Control Number	Custodian	File	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0001430	Anna Mackin	MSG		9/30/2021	Alexander Hammond; Andrew Hendrickson; Angus Lupton; Anna Barnett; Anna Mackin (attorney); Bryan Dunaway; Carrie Smith; Cody Terry; Doug Clements; Drew Tedford; Grecia Galvan; Jason Kirksey; Jorge Ramirez; Kenneth Bryan; Lara Wendler; Luis Moreno; Marc Salvato; Mathew Dowling; Paul Emerson; Randy Samuelson; Ruben O'Bell; Ryan Alter; Shelby Corine; Stacey Chamberlin; Sushma Smith; Taylor Borer	Sean Opperman (attorney)			Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001431	Anna Mackin	MSG		9/30/2021	Sean Opperman (attorney)	Jared May (TLC)			Legislative; Attorney Client; Work Product	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0001432	Anna Mackin	PDF							Legislative; Attorney Client; Work Product	district, with related data. Includes contributions and advice from counsel on the legality of the proposed legislation. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions legislative process and judgements. includes contributions and advice from counsel on the legality of the	**WITHHOLD.** LP2.
DOC_0001433	Anna Mackin	PDF		9/30/2021					Legislative; Attorney Client; Work Product	district, with related data. Includes contributions and advice from counsel on the legality of the proposed legislation. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions legislative process and judgements. includes contributions and advice from counsel on the legality of the	**WITHHOLD.** LP2.
DOC_0001434	Anna Mackin	MSG		10/1/2021	Jared May (TLC); Anna Mackin (attorney)	Sean Opperman (attorney)			Legislative; Attorney Client; Work Product	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0001437	Anna Mackin	MSG		10/1/2021	Alexander Hammond; Andrew Hendrickson; Angus Lupton; Anna Barnett; Anna Mackin (attorney); Bryan Dunaway; Carrie Smith; Cody Terry; Doug Clements; Drew Tedford; Grecia Galvan; Jason Kirksey; Jorge Ramirez; Kenneth Bryan; Lara Wendler; Louis Bedford, IV; Luis Moreno; Marc Salvato; Mathew Dowling; Paul Emerson; Randy Samuelson; Ruben O'Bell; Ryan Alter; Shelby Corine; Stacey Chamberlin; Sushma Smith; Taylor Borer	Sean Opperman (attorney)			legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001455	Anna Mackin	MSG		10/1/2021	Anna Mackin (attorney)	Sean Opperman (attorney)			Legislative; Attorney Client; Work Product	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0001456	Anna Mackin	PDF		10/1/2021					Legislative; Attorney Client; Work Product	Attachment to confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	**WITHHOLD.** LP2.

ECF No. 582

Control Number	Custodian	File	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0001457	Anna Mackin	PDF		10/1/2021					Legislative; Attorney Client; Work Product	Attachment to confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0001458	Anna Mackin	PDF		10/1/2021					Legislative; Attorney Client; Work Product	Attachment to confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0001459	Anna Mackin	PDF		10/1/2021					Legislative; Attorney Client; Work Product	Attachment to confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0001473	Anna Mackin	MSG		10/3/2021	Anna Mackin (attorney)	Christopher Hilton (attorney)			Legislative; Attorney Client; Work Product	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0001474	Anna Mackin	DOCX	Sean Opperman (attorney)	10/3/2021					Attorney Client; Work Product	Attachment to confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	
DOC_0001508	Anna Mackin	MSG		10/4/2021	Sean Opperman (attorney); Anna Mackin (attorney)	Jared May (TLC)			Legislative; Attorney Client; Work Product	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0001509	Anna Mackin	MSG		10/4/2021	Jared May (TLC); Anna Mackin (attorney).	Sean Opperman (attorney)			Legislative; Attorney Client; Work Product	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0001511	Anna Mackin	MSG		10/4/2021	Sean Opperman (attorney); Anna Mackin (attorney)	Jared May (TLC)			Legislative; Attorney Client; Work Product	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0001512	Anna Mackin	PDF							Legislative; Attorney Client; Work Product	district, with related data. Includes contributions and advice from counsel on the legality of the proposed legislation. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions legislative process and judgements. includes contributions and advice from counsel on the legality of the	**WITHHOLD.** LP2.
DOC_0001513	Anna Mackin	PDF		10/4/2021					Legislative; Attorney Client; Work Product	districts, with related data. Includes contributions and advice from counsel on the legality of the proposed legislation. Prepared for senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgement. Includes contributions and advice from counsel on the legality of the proposed districts.	**WITHHOLD.** LP2.
DOC_0001514	Anna Mackin	MSG		10/8/2021	Jared May (TLC); Anna Mackin (attorney)	Sean Opperman (attorney)			Legislative; Attorney Client; Work Product	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0001515	Anna Mackin	MSG		10/7/2021	Sean Opperman (attorney); anna Mackin (attorney)	Darrel Davila	Chris Sterner (attorney); Alix Morris (attorney)		Legislative; Attorney Client; Work Product	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001516	Anna Mackin	PDF		8/12/2021					Legislative	Confidential invoice for legal services provided in connection with redistricting legislation, given to Senate Redistricting Committee Staff.	**WITHHOLD.** LP2.

ECF No. 582

Control Number	Custodian	File	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0001517	Anna Mackin	PDF		8/5/2021					Legislative	Confidential invoice for legal services provided in connection with redistricting legislation, given to Senate Redistricting Committee Staff.	**WITHHOLD.** LP2.
DOC_0001518	Anna Mackin	MSG		10/7/2021	Sean Opperman (attorney); Anna Mackin (attorney)	Darrel Davila	Chris Sterner (attorney); Alix Morris (attorney)		Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001519	Anna Mackin	PDF		10/7/2021					Legislative	Confidential invoice for legal services provided in connection with redistricting legislation, given to Senate Redistricting Committee Staff.	**WITHHOLD.** LP2.
DOC_0001520	Anna Mackin	MSG		10/7/2021	Anna Mackin (attorney)	Sean Opperman (attorney)			Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001521	Anna Mackin	PDF		10/7/2021					Legislative	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for senator huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and	**WITHHOLD.** LP2.
DOC_0001522	Anna Mackin	PDF		10/7/2021					Legislative	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and judgements.	**WITHHOLD.** LP2.
DOC_0001523	Anna Mackin	PDF		10/7/2021					Legislative	Analysis of draft redistricting legislation relating to proposed districts, with related data. Prepared for senator huffman by staff for the purpose of considering redistricting legislation, revealing mental impressions on legislative process and	**WITHHOLD.** LP2.
DOC_0001538	Anna Mackin	MSG		10/8/2021	Sean Opperman (attorney); Anna Mackin (attorney)	Jared May (TLC)			Legislative; Attorney Client; Work Product	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0001539	Anna Mackin	MSG		10/8/2021	Sean Opperman (attorney); Anna Mackin (attorney)	Jared May (TLC)			Legislative; Attorney Client; Work Product	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislation.	**WITHHOLD.** LP2.
DOC_0001540	Anna Mackin	MSG		10/12/2021	Alexander Hammond; andrew Hendrickson; Angus Lupton; Anna Barnett; Anna Mackin (attorney); Bryan Dunaway; Carrie Smith; Cody Terry; Doug Clements; Drew Tedford; Grecia Galvan; Jason Kirksey_x; Jorge Ramirez; Kenneth Bryan; Lara Wendler; Louis Bedford, IV: Luis Moreno; Marc Salvato; Mathew Dowling; Paul Emerson; Randy Samuelson; Ruben O'Bell; Ryan Alter; Shelby Corine; Stacey Chamberlin; Sushma Smith; Taylor Borer; Vince Leibowitz	Sean Opperman (attorney)			Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001553	Anna Mackin	MSG		10/14/2021	Alexander Hammond; andrew Hendrickson; Angus Lupton; Anna Barnett; Anna Mackin (attorney); Bryan Dunaway; Carrie Smith; Cody Terry; Doug Clements; Drew Tedford; Grecia Galvan; Jason Kirksey_x; Jorge Ramirez; Kenneth Bryan; Lara Wendler; Louis Bedford, IV: Luis Moreno; Marc Salvato; Mathew Dowling; Paul Emerson; Randy Samuelson; Ruben O'Bell; Ryan Alter; Shelby Corine; Stacey Chamberlin; Sushma Smith; Taylor Borer; Vince Leibowitz				Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.

Control Number	Custodian	File	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
DOC_0001556	Anna Mackin	MSG		10/13/2021	Alexander Hammond; andrew Hendrickson; Angus Lupton; Anna Barnett; Anna Mackin (attorney); Bryan Dunaway; Carrie Smith; Cody Terry; Doug Clements; Drew Tedford; Grecia Galvan; Jason Kirksey_x; Jorge Ramirez; Kenneth Bryan; Lara Wendler; Louis Bedford, IV: Luis Moreno; Marc Salvato; Mathew Dowling; Paul Emerson; Randy Samuelson; Ruben O'Bell; Ryan Alter; Shelby Corine; Stacey Chamberlin; Sushma Smith; Taylor Borer; Vince Leibowitz	Sean Opperman (attorney)			Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001558	Anna Mackin	MSG		10/16/2021	Anna Mackin (attorney)	Sean Opperman (attorney)			Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001560	Anna Mackin	DOCX	Sean Opperman (attorney)	10/16/2021					Legislative; Attorney Client	districts, with related data. Includes contributions and advice from counsel on the legality of the proposed legislation. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislaiton, revealing mental impressions on legislative process and judgements. Includes contributions and advice from counsel on the legality of the proposed maps.	**WITHHOLD.** LP2.
DOC_0001561	Anna Mackin	MSG		10/16/2021	Anna Mackin (attorney)	Sean Opperman (attorney)			Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
DOC_0001562	Anna Mackin	DOCX	Sean Opperman (attorney)	10/16/2021					Legislative; Attorney Client	districts, with related data. Includes contributions and advice from counsel on the legality of the proposed legislation. Prepared for Senator Huffman by staff for the purpose of considering redistricting legislaiton, revealing mental impressions on legislative process and judgements. Includes contributions and advice from counsel on the legality of the proposed maps.	**WITHHOLD.** LP2.
DOC_0001563	Anna Mackin	MSG		10/17/2021	Anna Mackin (attorney); Sean Opperman (attorney)	Jared My (TLC)			Legislative; Attorney Client; Work Product	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislaton.	**WITHHOLD.** LP2.
DOC_0001564	Anna Mackin	MSG		10/18/2021	Alexander Hammond; Andrew Hendrickson; Angus Lupton; Anna Barnett; Anna Mackin (attorney); Bryan Dunaway; Carrie Smith, Cody Terry; Doug Clements; Drew Tedford; Grecia Galvan; Jorge Remirez; Kenneth Bryan; Lara Wedler; Luis Bedford, IV; Luism Moreno; Mare Salvato; Matthew Dowling; paul emerson, randy Samuelson; Ruben O'Bell; Ryan Alter; Shelby Corine; Staccy Chamberlin; Sushma Smith; Taylor Borer; Vince Leibowitz				Legislative	Confidential communication regarding draft redistricting legislation, reflecting and implicating legislative privileged thoughts, opinions, and mental impressions. Includes contributions and advice from counsel on the legality of the proposed legislaton.	**WITHHOLD.** LP2.
DOC_0001565	Anna Mackin	MSG		10/18/2021	Alexander Hammond; Amy Lane; Angus Lupton; Anna Barnett; Cari Christman; Chris steinbach; Cody Terry; Dave Nelson; Deisy Jaimes: Drew Graham; Garry Jones; Johanna Kim.	Sean Opperman (attorney)	Anna Mackin (attorney)		Legislative	Confidential communiction regarding draft redistricting legislation, reflecting and implicating legislative privledged thoughts, opinions, and mental impressions.	**WITHHOLD.** LP2.
N/A	Anna Mackin	DOCX	Scott Keller (attorney)	3/4/2021					Legislative; Attorney Client	Draft letter from Lehotsky Keller regarding retention of law firm to provide legal advice in connection with consideration of redistricting legislation.	**WITHHOLD.** LP2.

Control Number	Custodian	File	Author(s)	Date Created	To	From	CC	BCC	Privilege Claim	Description	RULING
N/A	Anna Mackin	MSG		12/7/2020	Anna Mackin (attorney)	Anna Mackin (attorney)			Legislative	Message forwarded from Anna Mackin Senate acount to Anna Mackin gmail acount, regarding invitation for confidential meeting relating to redistricting.	**WITHHOLD.** LP1.
N/A	Anna Mackin	MSG		2/12/2021	Anna Mackin (attorney)	Anna Mackin (attorney)			Legislative; Attorney Client	Message forwarded from Anna Mackin Senate acount to Anna Mackin gmail acount, regarding discussion of instructions for witnesses testifying by Zoom in regional redistricting hearings	**WITHHOLD.** LP2.
N/A	Anna Mackin	MSG		11/10/2020	Anna Mackin (attorney)	Sean Opperman (attorney)	Molly Spratt		Legislative	Message from Sean Opperman to Anna Mackin offering heremployment by Senate RedistrictingCommittee, and describing positionand employment conditions.	**WITHHOLD.** LP2.
N/A	Anna Mackin	MSG		8/25/2021	Anna Mackin (attorney)	Thomas Bryan			Legislative	Message from Thomas Bryan to Anna Mackin discussing potential for him to providing consulting services in connection with consideration of redistricting legislation	**WITHHOLD.** LP2.

ECF Nos. 600 & 602

Deponent	Line Number	RULING
Jeffrey Archer	22:18-24:2	LP2
Jeffrey Archer	33:22-34:17	LP2
Jeffrey Archer	37:15-38:3	LP2
Jeffrey Archer	38:4-14	LP2
Jeffrey Archer	46:14-25	LP2 to the extent not public
Jeffrey Archer	79:2-8	OVERRULED. Improper objection. See ECF No. 282 at 4.
Jeffrey Archer	52:19-53:17	LP2
Jeffrey Archer	53:18-54:13	LP2
Jeffrey Archer	54:14-23	LP2
Jeffrey Archer	55:9-56:1	LP2
Jeffrey Archer	86:11-16	LP2
Jeffrey Archer	86:17-87:5	LP2
Jeffrey Archer	98:19-99:4	OVERRULED. Improper objection. See ECF No. 282 at 4.
Jeffrey Archer	112:9-113:4	LP2
Jeffrey Archer	113:5-15	LP4
Jeffrey Archer	114:17-25	LP2
Jeffrey Archer	33:22-34:17	LP2
Jeffrey Archer	37:15-38:3	LP2
Jeffrey Archer	38:4-14	LP2
Jeffrey Archer	48:4-21	LP2 to the extent not public
Jeffrey Archer	53:18-54:13	LP2
Jeffrey Archer	54:14-23	LP2
Jeffrey Archer	55:9-56:1	LP2
Jeffrey Archer	61:25-62:16	LP2
Jeffrey Archer	63:7-20	LP2
Jeffrey Archer	66:23-67:12	LP2
Jeffrey Archer	79:2-8	OVERRULED. Improper objection. See ECF No. 282 at 4.
Jeffrey Archer	80:13-81:1	LP2
Jeffrey Archer	86:11-16	LP2
Jeffrey Archer	86:17-87:5	LP2
Jeffrey Archer	97:18-98:10	LP2
Jeffrey Archer	98:19-99:4	OVERRULED. Improper objection. See ECF No. 282 at 4.
Jeffrey Archer	112:9-113:4	LP2
Jeffrey Archer	113:5-15	LP4
Jeffrey Archer	114:17-25	LP2
Jeffrey Archer	46:14-25	LP3
Jeffrey Archer	48:4-21	LP3
Jeffrey Archer	38:4-14	LP2
Jeffrey Archer	48:4-21	LP2 to the extent not pubic
Jeffrey Archer	61:25-62:16	LP2
Jeffrey Archer	63:7-20	LP2
Jeffrey Archer	66:23-67:12	LP2
Jeffrey Archer	52:19-53:17	LP2
Jeffrey Archer	61:25-62:16	LP2
Jeffrey Archer	80:13-81:1	LP2
Jeffrey Archer	85:25-86:10	LP2
Jeffrey Archer	97:18-98:10	LP2
Jeffrey Archer	22:18-24:2	LP2
Jeffrey Archer	33:22-34:17	LP2
Jeffrey Archer	37:15-38:3	LP2
Jeffrey Archer	46:14-25	LP2
Jeffrey Archer	52:19-53:17	LP2
Jeffrey Archer	53:18-54:13	LP2
Jeffrey Archer	54:14-23	LP2
Jeffrey Archer	55:9-56:1	LP2
Jeffrey Archer	66:23-67:12	LP2
Jeffrey Archer	79:2-8	OVERRULED. Improper objection. See ECF No. 282 at 4.

ECF Nos. 600 & 602

Deponent	Line Number	RULING
Jeffrey Archer	80:13-81:1	LP2
Jeffrey Archer	86:11-16	LP2
Jeffrey Archer	98:19-99:4	OVERRULED. Improper objection. See ECF No. 282 at 4.
Jeffrey Archer	66:23-67:12	LP2
Jeffrey Archer	79:2-8	OVERRULED. Improper objection. See ECF No. 282 at 4.
Jeffrey Archer	80:13-81:1	LP2
Jeffrey Archer	86:11-16	LP2
Jeffrey Archer	98:19-99:4	OVERRULED. Improper objection. See ECF No. 282 at 4.

ECF No. 636

Deponent	Starting Page Number	Line Number	RULING
Rep. Todd Hunter	17	8-15	LP1
Rep. Todd Hunter	18	8-13	LP1
Rep. Todd Hunter	18	21	LP1
Rep. Todd Hunter	19	18-19	LP1
Rep. Todd Hunter	19	23-24	LP1
Rep. Todd Hunter	20	7-8	LP1
Rep. Todd Hunter	21	5-6	LP1
Rep. Todd Hunter	23	10-12	LP1
Rep. Todd Hunter	32	8-9	LP1
Rep. Todd Hunter	34	21-22	LP1
Rep. Todd Hunter	42	18-19	LP1
Rep. Todd Hunter	43	6-7	LP1
Rep. Todd Hunter	46	11-12	LP1
Rep. Todd Hunter	46	23-24	LP1
Rep. Todd Hunter	47	14-15	LP1
Rep. Todd Hunter	47	24-25	LP1
Rep. Todd Hunter	48	15-20	LP1
Rep. Todd Hunter	58	22-23	LP1
Rep. Todd Hunter	62	17-18	LP1
Rep. Todd Hunter	66	8-9	LP1
Rep. Todd Hunter	66	18-24	LP1
Rep. Todd Hunter	68	16-17	LP1
Rep. Todd Hunter	68-69	68:25-69:2	LP1
Rep. Todd Hunter	69	6-7	LP1
Rep. Todd Hunter	70	8	LP1
Rep. Todd Hunter	70	23-24	LP1
Rep. Todd Hunter	71	5	LP1
Rep. Todd Hunter	73	6-7	LP1
Rep. Todd Hunter	73	19-20	LP1
Rep. Todd Hunter	74	15-16	LP1
Rep. Todd Hunter	75	3	LP1
Rep. Todd Hunter	76	6-7	LP1
Rep. Todd Hunter	76	12-13	LP1
Rep. Todd Hunter	76	21	LP1
Rep. Todd Hunter	77	5-6	LP1
Rep. Todd Hunter	80	8-9	LP1
Rep. Todd Hunter	80	16	LP1
Rep. Todd Hunter	81	8-9	LP1
Rep. Todd Hunter	82	1	LP1
Rep. Todd Hunter	82	13-14	LP1
Rep. Todd Hunter	82	23-24	LP1
Rep. Todd Hunter	83	13-14	LP1
Rep. Todd Hunter	83	19-20	LP1
Rep. Todd Hunter	85	3-4	LP1
Rep. Todd Hunter	86	15-16	LP1
Rep. Todd Hunter	86	24-25	LP1
Rep. Todd Hunter	88	14-15	LP1
Rep. Todd Hunter	88-89	88:23-89:4	LP1
Rep. Todd Hunter	94	6	LP1
Rep. Todd Hunter	95	21-22	LP1
Rep. Todd Hunter	165	17-18	LP1
Rep. Todd Hunter	167	8-9	LP1
Rep. Andrew Murr	8	17-18	LP1
Rep. Andrew Murr	9	22-25	OVERRULED. Improper objection. See ECF No. 282 at 4.
Rep. Andrew Murr	11	12-14	OVERRULED. Improper objection. See ECF No. 282 at 4.
Rep. Andrew Murr	14	12-14	LP1
Rep. Andrew Murr	16	4-6	LP1

ECF No. 636

Deponent	Starting Page Number	Line Number	RULING
Rep. Andrew Murr	23	8-11	LP1
Rep. Andrew Murr	23	16-17	LP1
Rep. Andrew Murr	24	7-9	LP1
Rep. Andrew Murr	27	18-19	LP1
Rep. Andrew Murr	28	9-10	LP1
Rep. Andrew Murr	40	24-25	LP1
Rep. Andrew Murr	41	12-13	LP1
Rep. Andrew Murr	41	24-25	OVERRULED. Improper objection. See ECF No. 282 at 4.
Rep. Andrew Murr	42	4	LP1

ECF No. 638

Deponent	Line Number	RULING
Rep. Murr	24:2-3	OVERRULED. Improper objection. See ECF No. 282 at 4.
Rep. Murr	28:4-5	OVERRULED. Improper objection. See ECF No. 282 at 4.
Rep. Hunter	117:7-8	LP1
Rep. Hunter	121:13-14	LP1
Rep. Hunter	135:9-10	LP1
Rep. Hunter	150:20-22	OVERRULED. Improper objection. See ECF No. 282 at 4.
Rep. Hunter	171:2	LP1
Rep. Hunter	171:9-10	LP1
Rep. Hunter	171:19-20	LP1
Rep. Hunter	172:1-2	LP1
Rep. Hunter	172:22-23	LP1
Rep. Hunter	173:10-13	LP1
Rep. Hunter	173:24-25	LP1
Rep. Hunter	150:20-22	OVERRULED. Improper objection. See ECF No. 282 at 4.
Rep. Murr	28:4-5	OVERRULED. Improper objection. See ECF No. 282 at 4.
Rep. Hunter	117:7-8	LP1
Rep. Hunter	150:20-22	OVERRULED. Improper objection. See ECF No. 282 at 4.
Rep. Hunter	163:3-4	OVERRULED. Improper objection. See ECF No. 282 at 4.
Rep. Hunter	171:9-10	LP1
Rep. Hunter	171:19-20	LP1
Rep. Hunter	173:24-25	LP1
Rep. Hunter	121:13-14	LP1
Rep. Hunter	172:12-13	LP1
Rep. Hunter	172:22-23	LP1
Rep. Hunter	117:7-8	LP1
Rep. Hunter	121:13-14	LP1
Rep. Hunter	135:9-10	LP1
Rep. Hunter	150:20-22	OVERRULED. Improper objection. See ECF No. 282 at 4.
Rep. Hunter	163:3-4	OVERRULED. Improper objection. See ECF No. 282 at 4.
Rep. Hunter	171:19-20	LP1
Rep. Hunter	173:24-25	LP1
Rep. Hunter	174:8-9	LP1

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
EL PASO DIVISION

LEAGUE OF UNITED LATIN AMERICAN CITIZENS, *et al.*,	§	
***Plaintiffs*,**	§	**EP-21-CV-00259-DCG-JES-JVB**
EDDIE BERNICE JOHNSON, *et al.*,	§	**[Lead Case]**
***Plaintiff-Intervenors*,**	§	**&**
v.	§	**All Consolidated Cases**
GREG ABBOTT, *in his official capacity as Governor of the State of Texas*, ***et al.*,**	§	
***Defendants*.**	§	

OPINION DISSENTING FROM MEMORANDUM OPINION AND ORDER (ECF No. 746)

DAVID C. GUADERRAMA, Senior District Judge, dissenting:

What follows is my respectful dissent from the panel's December 21, 2023 Memorandum Opinion and Order on legislative privilege issues (ECF No. 746).[1] The panel unanimously agreed to release the majority's opinion before this dissent was ready so that the case could proceed in the meantime.[2] I greatly appreciate the flexibility, patience, and collegiality that my colleagues on the panel have displayed towards me while they've waited for me to finish drafting this dissent, and I sincerely thank them for it.

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Although the Texas Legislature's reasons for drawing the State's electoral maps the way it did are one of the central issues in this redistricting case,[3] the Texas Legislators nevertheless insist that the state legislative privilege forbids Plaintiffs from obtaining documents bearing

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[1] *See League of United Latin Am. Citizens v. Abbott*, No. 3:21-CV-00259, 2023 WL 8880313 (W.D. Tex. Dec. 21, 2023) [hereinafter *Majority Op.*].

An interlocutory appeal of the majority's Memorandum Opinion and Order is currently pending before the Fifth Circuit. *See* Notice of Appeal, *League of United Latin Am. Citizens v. Abbott*, No. 24-50128 (5th Cir. Feb. 27, 2024). However, because this dissenting opinion doesn't substantively modify the order currently on appeal, but instead merely explains my reasons for disagreeing with it, the pending interlocutory appeal doesn't divest us of jurisdiction to release the dissent. *See Coastal Corp. v. Tex. E. Corp.*, 869 F.2d 817, 820 (5th Cir. 1989) (explaining that although a district court "lacks jurisdiction to tamper in any way with [an] order . . . on interlocutory appeal," the district court may still take actions that "preserve the status quo of the case as it [sits] before the court of appeals" (cleaned up)); *cf. In re Chevron Corp.*, 749 F. Supp. 2d 170, 174–75, 178–79 (S.D.N.Y. 2010) (suggesting that if a district court "rule[s] on [a discovery motion] by summary order, indicating that a full opinion [will] follow," but the losing party then appeals that summary order before the district court releases its full opinion, then the pending interlocutory appeal doesn't divest the district court of jurisdiction to issue the full opinion so long as it merely "expand[s] on the reasoning underlying the" order without "alter[ing] the order in any respect"), *aff'd sub nom. Lago Agrio Pls. v. Chevron Corp.*, 409 F. App'x 393 (2d Cir. 2010).

[2] *See Majority Op.*, 2023 WL 8880313, at *1 n.1.

[3] *See, e.g.*, *Favors v. Cuomo*, 285 F.R.D. 187, 219 (E.D.N.Y. 2012) [hereinafter *Favors I*] ("[T]he motives and considerations behind the [redistricting plans], to a large degree, *are* the case." (cleaned up) (emphasis added) (quoting *Comm. for a Fair & Balanced Map v. Ill. State Bd. of Elections*, No. 11 C 5065, 2011 WL 4837508, at *7 (N.D. Ill. Oct. 12, 2011))); *see also infra* Section I.

directly on the Legislature's "intent and motive in enacting the redistricting legislation" at issue here.[4] The Legislators base that bold contention on the Fifth Circuit's recent decision in *La Union del Pueblo Entero v. Abbott (Hughes)*,[5] which held that "even when constitutional rights are at stake," and even when a plaintiff claims that a state passed a law for racially discriminatory reasons, the legislative privilege presumptively bars that plaintiff from obtaining documents directly probative of whether the state legislature passed that law with discriminatory intent.[6]

Hughes is a published Fifth Circuit opinion,[7] and courts in this Circuit are usually bound to follow such opinions.[8] But *Hughes* isn't the only published Fifth Circuit case on point. Just a few years before *Hughes*, the Fifth Circuit ruled in *Jefferson Community Health Care Centers, Inc. v. Jefferson Parish Government* that the state legislative privilege "must be strictly construed and accepted only to the very limited extent that permitting a refusal to testify or excluding relevant evidence has a public good transcending the normally predominant principle of utilizing

[4] State Defs.' & Legis. Subpoena Recipients' Suppl. Br., ECF No. 731, at 7.

All page citations to docket entries in this dissenting opinion refer to the page numbers assigned by the Court's CM/ECF system, rather than the document's internal pagination.

[5] *See id.* at 4 (arguing that *Hughes* "rejected the primary argument that all Plaintiffs press here—that legislative privilege must yield in cases alleging racially discriminatory intent and violations of the Constitution and Voting Rights Act [("VRA")] brought by the United States and dozens of plaintiffs" (cleaned up) (quoting *La Union del Pueblo Entero v. Abbott (Hughes)*, 68 F.4th 228, 232, 237–38 (5th Cir. 2023) [hereinafter *Hughes 5th Cir. Op.*])).

[6] *See Hughes 5th Cir. Op.*, 68 F.4th at 238; *see also id.* ("[C]ourts are not to facilitate an expedition seeking to uncover a legislator's subjective intent in drafting, supporting, or opposing proposed or enacted legislation.").

[7] *See id.* at 231.

[8] *See, e.g.*, *ODonnell v. Salgado*, 913 F.3d 479, 482 (5th Cir. 2019) ("[P]ublished [Fifth Circuit] opinions[] bind[] the district courts in this circuit.").

all rational means for ascertaining the truth."[9] Were we to "strictly construe[]" the state legislative privilege as *Jefferson Community* commands,[10] much of the information that the Legislators claim is privileged would in fact be discoverable.[11]

The Legislators nonetheless insist that *Hughes* governs the legislative privilege analysis, not *Jefferson Community*.[12] That's exactly backwards. Under the Fifth Circuit's "Rule of Orderliness," "to the extent that a more recent case" (*Hughes*) "contradicts an older case" (*Jefferson Community*), "the newer language has no effect."[13] So, to the extent *Hughes* and *Jefferson Community* are irreconcilable, this panel is bound to follow *Jefferson Community*, not *Hughes*.[14] Because the panel does the opposite,[15] I respectfully dissent.

I. Proving Intentional Discrimination in a Redistricting Case

Among other causes of action, Plaintiffs claim that the Texas Legislature intentionally discriminated on the basis of race and national origin when it drew the State's electoral maps in the latest redistricting cycle.[16] To prevail on their intentional discrimination claims, Plaintiffs

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[9] *See Jefferson Cmty. Health Ctrs., Inc. v. Jefferson Par. Gov't*, 849 F.3d 615, 624 (5th Cir. 2017) (quoting *Perez v. Perry*, No. 5:11-CV-360, 2014 WL 106927, at *1 (W.D. Tex. Jan. 8, 2014)).

[10] *See id.* (quoting *Perez*, 2014 WL 106927, at *1).

[11] *Contra* State Defs.' & Legis. Subpoena Recipients' Suppl. Br. at 6 (insisting that "[t]he legislative privilege categorically bars the disclosure of" all documents that "concern actions that occurred within the sphere of legitimate legislative activity" (cleaned up) (quoting *Hughes 5th Cir. Op.*, 68 F.4th at 235)).

[12] *See id.* at 4.

[13] *See, e.g.*, *Arnold v. U.S. Dep't Interior*, 213 F.3d 193, 196 n.4 (5th Cir. 2000).

[14] *See infra* Section III.

[15] *See Majority Op.*, 2023 WL 8880313, at *1 ("*Hughes* governs our discussion of the legislative privilege's scope, not *Jefferson*.").

[16] *See, e.g.*, LULAC Pls.' 4th Am. Compl., ECF No. 714, at 188; U.S.'s Mot. Enforce 3d-Party Subpoenas, ECF No. 351, at 2.

will need to prove just that: *intent* to discriminate.[17] It won't suffice to show that the redistricting plan merely has a racially disparate *effect*[18] (although evidence of such an effect would of course be relevant).[19] Nor can Plaintiffs meet their burden by showing that the Legislature was merely *aware* that the plan had a racially disparate effect.[20] Plaintiffs must instead prove that the Texas

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[17] *See infra* note 21 and accompanying text.

[18] *See, e.g.*, *Pers. Adm'r of Mass. v. Feeney*, 442 U.S. 256, 272 (1979) ("[E]ven if a neutral law has a disproportionately adverse effect upon a racial minority, it is unconstitutional under the Equal Protection Clause only if that impact can be traced to a discriminatory purpose."); *Village of Arlington Heights v. Metro. Hous. Dev. Corp.*, 429 U.S. 252, 264–65 (1977) [hereinafter *Arlington Heights S. Ct. Op.*] ("[O]fficial action will not be held unconstitutional solely because it results in a racially disproportionate impact.").

Admittedly, some of Plaintiffs' other claims don't require proof of discriminatory intent. Besides their intentional discrimination claims, the Plaintiffs also assert claims under Section 2 of the VRA, *see, e.g.*, LULAC Pls.' 4th Am. Compl. at 190–91, which "can 'be proved by showing discriminatory effect alone,'" *e.g.*, *Veasey v. Abbott*, 830 F.3d 216, 243 (5th Cir. 2016) (en banc) [hereinafter *Veasey En Banc Op.*] (quoting *Thornburg v. Gingles*, 478 U.S. 30, 35 (1986)).

If Plaintiffs were raising discriminatory effect claims *alone*, the Legislators might have a stronger argument that this Court should limit discovery regarding the Legislature's intent. *See In re N.D. Legis. Assembly*, 70 F.4th 460, 465 (8th Cir. 2023) ("[Because the plaintiffs in this case are asserting claims under VRA § 2 alone, this] case does not . . . turn on legislative intent. A claim under § 2 of the [VRA] does not depend on whether the disputed legislative districts were adopted with the intent to discriminate against minority voters, for the statute repudiated an 'intent test.' Any exception to legislative privilege that might be available in a case that is based on a legislature's alleged intent is thus inapplicable." (cleaned up)).

Here, however, Plaintiffs are pursuing discriminatory effect claims *as well as* discriminatory intent claims. The fact that Plaintiffs are asserting the former thus shouldn't foreclose them from also seeking evidence to support the latter. *See, e.g.*, *United States v. Irvin*, 127 F.R.D. 169, 170–71, 174 (C.D. Cal. 1989) (even though VRA § 2 gives plaintiffs "the option of proving *either* discriminatory intent *or* discriminatory result[s]," that did not relieve legislators of the obligation to "respond to deposition questions . . . concerning the intent with which the [legislature] adopted [the enacted redistricting] plan and rejected certain alternatives").

[19] *See Arlington Heights S. Ct. Op.*, 429 U.S. at 266 ("The impact of the official action whether it 'bears more heavily on one race than another' may provide an important starting point. Sometimes a clear pattern, unexplainable on grounds other than race, emerges from the effect of the state action even when the governing legislation appears neutral on its face." (quoting *Washington v. Davis*, 426 U.S. 229, 242 (1976))).

[20] *See, e.g.*, *Feeney*, 442 U.S. at 279 ("'Discriminatory purpose' . . . implies more than intent as volition or intent as awareness of consequences.").

Legislature "selected or reaffirmed a particular course of action at least in part '*because of*,' not merely 'in spite of,' its adverse effects upon an identifiable group."[21]

The very nature of Plaintiffs' claims thus requires them (and us) to probe the Texas Legislature's motivations for designing the electoral map the way it did.[22] Put more bluntly, "the motives and considerations behind the [challenged redistricting plans] *are* the case."[23]

As the Fifth Circuit has observed, however, "[p]roving the motivation behind official action" is "'a problematic undertaking' and 'a hazardous matter.'"[24] Besides the inherent difficulty of proving a legislature's private, subjective intentions *via* external, objective proof,[25] litigants challenging redistricting plans must also overcome the presumption that legislatures draft and enact legislation—including redistricting legislation—in good faith.[26]

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[21] *See id.* (emphasis added).

But see id. at 279 n.25 ("This is not to say that the inevitability or foreseeability of consequences of a neutral rule has no bearing upon the existence of discriminatory intent. Certainly, when the adverse consequences of a law upon an identifiable group are . . . inevitable . . . a strong inference that the adverse effects were desired can reasonably be drawn.").

[22] *See, e.g.*, *Abbott v. Perez*, 585 U.S. 579, 603, 605 (2018) (remarking that "the intent of the . . . Legislature" is "what matters" when a plaintiff alleges that a redistricting plan "was enacted with discriminatory intent"); *Bethune-Hill v. Va. State Bd. of Elections*, 114 F. Supp. 3d 323, 337 (E.D. Va. 2015) ("[J]udicial inquiry into legislative intent is specifically contemplated as part of the resolution of the core issue that [redistricting] cases present.").

[23] *Favors I*, 285 F.R.D. at 219 (cleaned up) (emphasis added) (quoting *Comm. for a Fair & Balanced Map*, 2011 WL 4837508, at *7).

[24] *See Fusilier v. Landry*, 963 F.3d 447, 464 (5th Cir. 2020) (first quoting *Hunter v. Underwood*, 471 U.S. 222, 228 (1985); then quoting *United States v. O'Brien*, 391 U.S. 367, 383 (1968)).

[25] *See, e.g.*, *Feeney*, 442 U.S. at 279 n.24 ("Proof of discriminatory intent must necessarily usually rely on objective factors . . . .").

[26] *See, e.g.*, *Abbott*, 585 U.S. at 605 (noting that the plaintiff bears the "burden to overcome the presumption of legislative good faith and show that the . . . [l]egislature acted with invidious intent"); *Prejean v. Foster*, 227 F.3d 504, 509 (5th Cir. 2000) ("Given the presumption of the legislature's good faith in redistricting, showing that a redistricting plan intentionally discriminates is not ordinarily an easy task.").

Thus, as the Supreme Court recognized in *Village of Arlington Heights v. Metropolitan Housing Development Corporation*, "[d]etermining whether invidious discriminatory purpose was a motivating factor" for a legislative act "demands a sensitive inquiry into such circumstantial and direct evidence of intent as may be available."[27] Direct evidence, on one hand, "is evidence that would prove discriminatory intent without reliance on inference or presumption."[28] "Such evidence essentially requires an admission by the decision-maker that the decision-maker's actions were based upon the prohibited animus."[29] Circumstantial evidence, by contrast, is that which "allows a factfinder to draw a reasonable *inference* that discrimination occurred."[30]

To be sure, plaintiffs don't necessarily *need* direct evidence to prevail on an intentional discrimination claim; circumstantial evidence alone can sometimes suffice.[31] Binding Fifth

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[27] 429 U.S. at 266; *see also infra* Section II.C.2.a.i (analyzing *Arlington Heights* in greater depth).

[28] *Cf., e.g.*, *Harper v. Fulton County*, 748 F.3d 761, 765 (7th Cir. 2014) (quoting *Makowski v. SmithAmundsen LLC*, 662 F.3d 818, 824 (7th Cir. 2011)) (defining "direct evidence" in the employment discrimination context); *see also Veasey En Banc Op.*, 830 F.3d at 236 n.20 (opining that although "employment discrimination cases are not directly supportive" in the voting rights context, "they are analogous" nonetheless).

[29] *Cf., e.g.*, *Harper*, 748 F.3d at 765 (cleaned up) (quoting *Serednyj v. Beverly Healthcare, LLC*, 656 F.3d 540, 548 (7th Cir. 2011), *abrogated on other grounds*, *Young v. United Parcel Serv., Inc.*, 575 U.S. 206 (2015)).

[30] *Cf., e.g.*, *Bondurant v. Air Line Pilots Ass'n, Int'l*, 679 F.3d 386, 394 (6th Cir. 2012) (defining the term in the employment discrimination context) (cleaned up) (emphasis added) (quoting *Geiger v. Tower Auto.*, 579 F.3d 614, 626 (6th Cir. 2009)).

[31] *See, e.g.*, *Hunt v. Cromartie*, 526 U.S. 541, 549 (1999) ("[A]ppellees' evidence tends to support an inference that the State drew its district lines with an impermissible racial motive—even though they presented no direct evidence of intent."); *Veasey En Banc Op.*, 830 F.3d at 235 ("[A]lthough the record does not contain *direct* evidence that the Texas Legislature passed [a voter ID law] with a racially invidious purpose, this does not mean there is no evidence that supports a finding of discriminatory intent. '[D]iscriminatory intent need not be proved by direct evidence.'" (quoting *Rogers v. Lodge*, 458 U.S. 613, 618 (1982))); *Mich. State A. Philip Randolph Inst. v. Johnson*, No. 16-cv-11844, 2018 WL 1465767, at *5 (E.D. Mich. Jan. 4, 2018) ("[W]hile testimony and other communications reflecting a legislator's stated

Circuit precedent holds, however, that "direct evidence of discriminatory intent must be prioritized over circumstantial evidence" in redistricting cases.[32] So, all else being equal, a plaintiff basing an intentional discrimination claim on circumstantial evidence alone is in a worse position.[33]

Thus, to have a fair chance to satisfy their heavy evidentiary burdens, plaintiffs challenging redistricting plans must have a meaningful opportunity to examine the plan's legislative record—including "contemporaneous statements by members of the decisionmaking body, minutes of its meetings, or reports"—for direct evidence of discriminatory intent.[34] *Arlington Heights* explicitly contemplates that such evidence "may be highly relevant" and is therefore a "subject[] of proper inquiry" in intentional discrimination cases.[35]

Obviously, though, direct evidence of discriminatory intent is rarely accessible in the public domain. Whereas, in darker chapters of our nation's history, it wasn't uncommon for lawmakers to announce publicly that they passed a law for racially discriminatory reasons,[36] a legislator in this century would have to be uncommonly brazen or obtuse to broadcast in the

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motivation might be the most direct form of evidence of discriminatory intent, it is not necessary to sustain a claim under the Equal Protection Clause or [VRA].").

[32] *Fusilier*, 963 F.3d at 464.

[33] *See, e.g.*, *Benisek v. Lamone*, 241 F. Supp. 3d 566, 576 (D. Md. 2017) (opining that publicly-available legislative records, while "valuable," are "not a substitute for the ability to depose a witness and obtain *direct* evidence of motive and intent" in redistricting cases).

[34] *See Arlington Heights S. Ct. Op.*, 429 U.S. at 268.

[35] *See id.*

[36] *See, e.g.*, *Hunter*, 471 U.S. at 229 (recounting that the President of the Alabama Constitutional Convention of 1901 "stated in his opening address" that the Convention's purpose was "to establish white supremacy in th[e] State" (quoting 1 OFFICIAL PROCEEDINGS OF THE CONSTITUTIONAL CONVENTION OF THE STATE OF ALABAMA, May 21st, 1901 to September 3rd, 1901, p. 8 (1940))).

legislative record that he and his colleagues purposefully drew an electoral map to diminish a racial group's voting power.[37]

So, if direct evidence of discriminatory intent *does* exist in any particular case, the plaintiff probably won't find it in the public record; it's probably hiding in the legislators' internal communications and actions.[38] For exactly that reason, the Plaintiffs here are seeking nonpublic evidence that could reveal the private motivations underlying Texas's redistricting plans.[39]

But even though that evidence would be uniquely probative of whether the Texas Legislature intentionally discriminated against voters of color,[40] that's exactly the evidence that

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[37] *See, e.g.*, *Hunt*, 526 U.S. at 553 ("Outright admissions of impermissible racial motivation are infrequent and plaintiffs often must rely upon other evidence."); *Nashville Student Org. Comm. v. Hargett*, 123 F. Supp. 3d 967, 970 (M.D. Tenn. 2015) ("[A]s numerous district courts have stated, the practical reality is that officials seldom, if ever, announce that they are pursuing a course of action because of an invidious discriminatory intent (as opposed to a legitimate policy reason).").

[38] *See, e.g.*, *Veasey v. Perry*, No. 2:13-CV-193, 2014 WL 1340077, at *2–3 (S.D. Tex. Apr. 3, 2014) [hereinafter *Veasey Dist. Ct. Op.*] (concluding that because state legislators "seldom, if ever, announce on the record that they are pursuing a particular course of action because of their desire to discriminate against a racial minority," litigants challenging a Texas voting law weren't limited to "publicly available sources (*e.g.*, public debates, legislative history, and floor speeches) to establish [their] discriminatory intent claim," but instead could obtain discovery regarding "what the individual legislators said amongst each other"); *N.C. State Conf. of the NAACP v. McCrory*, No. 1:13CV658, 2014 WL 12526799, at *2 (M.D.N.C. Nov. 20, 2014) (noting that "courts often look to legislative evidence outside the formal legislative record" "in [VRA] cases"), *objections overruled*, 2015 WL 12683665 (M.D.N.C. Feb. 4, 2015) [hereinafter *McCrory*].

[39] *See, e.g.*, U.S.'s Mot. Enforce 3d-Party Subpoenas at 4, 13 (seeking "documents reflecting the State Legislators' contemporaneous thoughts and motivations in drafting and enacting" the challenged redistricting legislation, "includ[ing] draft legislation and legislative communications" (cleaned up)); LULAC Pls.' Mot. Compel 3d-Party Subpoenas *Duces Tecum*, ECF No. 447, at 6 (seeking "[d]raft redistricting plans, the data used in drafting those plans, Respondents' communications (especially with map-drawers) and other legislative materials" because they may "bear directly on whether 'invidious discriminatory purpose was a motivating factor'" in the redistricting process (quoting *Arlington Heights S. Ct. Op.*, 429 U.S. at 266)).

[40] *See, e.g.*, *Cano v. Davis*, 193 F. Supp. 2d 1177, 1182 (C.D. Cal. 2002) (Reinhardt, J., concurring in part and dissenting in part) ("When a plaintiff must prove discriminatory intent on the part of a legislature, the statements of legislators involved in the process, especially leaders and committee chairmen, as well as the authors of the legislation involved, may in some instances be the best available

the Texas Legislators say Plaintiffs can't get.[41] The Legislators insist that the "state legislative privilege" doctrine "squarely foreclose[s]" Plaintiffs from obtaining any evidence bearing on "the legislators' intent and motive in enacting the redistricting legislation."[42]

If the Legislators are right that the legislative privilege categorically bars litigants from lifting the legislative rug to check for evidence of discriminatory intent hiding underneath, then it's unclear how litigants and courts are realistically supposed to perform the vitally important task of ferreting out and eradicating schemes to intentionally suppress a racial group's voting power.[43] To require plaintiffs to introduce proof of a legislature's motivations—while simultaneously barring them from discovering the evidence that is most probative of those motivations—effectively forces such plaintiffs "to litigate these important cases with one hand tied behind their backs."[44]

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evidence as to legislative motive. . . . Motive is often most easily discovered by examining the unguarded acts and statements of those who would otherwise attempt to conceal evidence of discriminatory intent."); *Benisek*, 241 F. Supp. 3d at 576 (remarking that "conversations between and among legislators" could "be the most probative evidence of intent" in a redistricting case "because they relate to moments when unconstitutional intent may have infected the legislative process").

[41] *See generally* State Defs.' & Legis. Subpoena Recipients' Suppl. Br.

[42] *Id.* at 7.

[43] *Cf., e.g.*, *Pernell v. Fla. Bd. of Governors of the State Univ.*, 84 F.4th 1339, 1354 (11th Cir. 2023) (Jill Pryor, J., dissenting) (opining in a different but analogous context that barring plaintiffs asserting racial discrimination claims from obtaining "discovery into legislative acts or the motivation for actual performance of legislative acts" "forces a whole category of plaintiffs, tasked with an already difficult standard of proof, to make their cases without the tools ordinarily available to civil litigants").

[44] *See id.* at 1346.

See also, e.g., *S.C. State Conf. of the NAACP v. McMaster*, 584 F. Supp. 3d 152, 164 (D.S.C. 2022) (remarking that plaintiffs challenging redistricting plans as racially discriminatory "cannot be expected to make th[at] showing in the dark"—that is, without "documents and communications which may demonstrate discriminatory intent by legislators or their key agents").

See also Marylanders for Fair Representation, Inc. v. Schaefer, 144 F.R.D. 292, 305 (D. Md. 1992) (opinion of Murnaghan, J. & Motz, J.) (opining that, because Congress and the Supreme Court have chosen to give federal courts jurisdiction to review state redistricting plans, federal courts must

More concerningly, if the state legislative privilege flatly forbade litigants from obtaining nonpublic evidence of discriminatory intent, then state legislators could potentially commit intentional discrimination with impunity—so long as they didn't carelessly let their unlawful motives slip into the public legislative record.[45] Such a privilege would thereby contravene the usual rule that evidentiary privileges cannot be "used as a 'cloak for illegal . . . behavior.'"[46]

provide litigants a meaningful opportunity to prevail on such challenges, as opposed to creating "bright line" evidentiary privileges that "bar virtually all discovery of relevant facts").

[45] *See, e.g.*, *Angelicare, LLC v. St. Bernard Parish*, No. 17-7360, 2018 WL 1172947, at *9 (E.D. La. Mar. 6, 2018) (noting the "concern that the legislative privilege could be used to allow legislators to hide evidence of discriminatory intent"); *Citizens Union of N.Y.C. v. Att'y Gen. of N.Y.*, 269 F. Supp. 3d 124, 167 (S.D.N.Y. 2017) ("[I]n discrimination cases like . . . redistricting and voting rights cases . . . evidence needed to demonstrate invidious or discriminatory motives or self-dealing may not be available from sources other than individual legislators; indeed, the legislator may have actively attempted to hide evidence of self-dealing or unlawful motives."); *Harris v. Ariz. Indep. Redistricting Comm'n*, 993 F. Supp. 2d 1042, 1070–71 (D. Ariz. 2014) ("In the event that plaintiffs' [redistricting] claims have merit, and that the commissioners were motivated by an impermissible purpose, the commissioners would likely have kept out of the public record evidence making that purpose apparent.").

[46] *Cf., e.g.*, *Smith v. Powder Mountain, LLC*, No. 08-cv-80820, 2009 WL 10698489, at *7 (S.D. Fla. Nov. 9, 2009) (quoting *In re Grand Jury Proc.*, 680 F.2d 1026, 1028 (5th Cir. Unit A 1982)) (discussing the attorney-client privilege).

See also, e.g., *In re Grand Jury Proc.*, 604 F.2d 798, 802 (3d Cir. 1979) (remarking that the work product privilege would be "perverted if it [could be] used to further illegal activities"); *Waters v. U.S. Capitol Police Bd.*, 218 F.R.D. 323, 324 (D.D.C. 2003) (opining that the deliberative process privilege should not "thwart discovery of information in a case in which a plaintiff challenges governmental action as discriminatory").

II. The State Legislative Privilege's Proper Scope

However, binding Supreme Court and Fifth Circuit precedent don't support the Legislators' absolutist conception of the state legislative privilege—quite the opposite. To understand why that's so, though, one must first understand the critical differences between four related but distinct legal doctrines:

(1) *Federal* Legislative *Immunity*;

(2) Federal Legislative *Privilege*;

(3) *State* Legislative Immunity; and

(4) State Legislative *Privilege*.

For the reasons explained below, although the first three of those four doctrines categorically prohibit inquiries into a legislature's motives and intent, the state legislative privilege imposes no such absolute bar.[47]

[47] *See infra* Sections II.A–C.

A. The Distinction Between Legislative Privilege and Legislative Immunity

Federal Judges and Justices have occasionally used the phrase "legislative privilege" as a single catch-all term to refer to two distinct concepts:

(1) A legislator's *privilege* to *withhold* documents, testimony, and other evidence from *discovery* (and, ultimately, from public disclosure at trial); and

(2) A legislator's *immunity* from *suit, prosecution, and liability* for their legislative acts.[48]

As illustrated below, though, that terminological looseness has led some courts to conflate those two doctrines in ways that obscure their critical differences.[49] To better illuminate those important distinctions, some courts use the phrase "legislative *privilege*" to refer only to the first of those two concepts,[50] and the term "legislative *immunity*" to refer exclusively the second.[51] This dissenting opinion will do the same.

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[48] *See, e.g.*, *Am. Trucking Ass'ns, Inc. v. Alviti*, 14 F.4th 76, 86 n.6 (1st Cir. 2021) ("The terms 'immunity' and 'privilege' have at times been used interchangeably."); *Rodriguez v. Pataki*, 280 F. Supp. 2d 89, 95 (S.D.N.Y.) (opining that although legislative immunity and legislative privilege are "[c]losely related" and "often discussed interchangeably," there are "key difference[s]" between the two doctrines), *aff'd*, 293 F. Supp. 2d 302 (S.D.N.Y. 2003).

See also, e.g., *Bogan v. Scott-Harris*, 523 U.S. 44, 54 (1998) (referring to "[t]he *privilege* of absolute [legislative] *immunity*" (emphases added)); *Tenney v. Brandhove*, 341 U.S. 367, 372 (1951) (discussing "[t]he *privilege* of legislators to be free from *arrest or civil process* for what they do or say in legislative proceedings" (emphases added)); *United States v. Johnson*, 383 U.S. 169, 179 (1966) ("In *Tenney v. Brandhove*, at issue was whether legislative *privilege* protected a member of the California Legislature against a *suit* brought under the Civil Rights statute . . . . (emphases added) (citations omitted)); *Gravel v. United States*, 408 U.S. 606, 626 (1972) (referring to "*immunity . . . from testifying*" (emphases added)); *N.D. Legis. Assembly*, 70 F.4th at 463 (remarking that legislative "*privilege* . . . protects legislators from *suit or* discovery" (emphases added)).

[49] *See infra* Sections II.C.2.c, II.C.2.f.ii.

[50] *See, e.g.*, *Glowgower v. Bybee-Fields*, No. 3:21-CV-00012, 2022 WL 4042412, at *8 (E.D. Ky. Sept. 2, 2022) ("In a motion to compel, where questions of discovery are at issue, the relevant question is whether the legislative *privilege*—not legislative *immunity*—applies."); *Comm. for a Fair & Balanced Map*, 2011 WL 4837508, at *7 ("The legislative *privilege* does *not* shield lawmakers from being *sued*, but rather protects them from *producing documents* in certain cases." (emphases added)).

B. Federal Legislators and the Federal Speech or Debate Clause

After disentangling legislative *immunity* from legislative *privilege*, the next step is to determine their respective scopes.[52] For the following reasons, whereas *federal* legislative immunity and privilege are roughly coextensive,[53] the legislative privilege that *state* legislators enjoy is much narrower than state legislative *immunity*.[54]

1. Federal Legislative Immunity

Members of the U.S. Congress possess broad legislative immunity by virtue of the U.S. Constitution's Speech or Debate Clause,[55] which provides that

> Senators and Representatives . . . shall in all Cases, except Treason, Felony and Breach of the Peace, be privileged from Arrest during their Attendance at the Session of their respective Houses, and in going to and return from the same; and for any Speech or Debate in either House, they shall not be questioned in any other Place.[56]

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[51] *See, e.g.*, *Alviti*, 14 F.4th at 86 n.6 ("[F]ollowing the Supreme Court's lead[,] . . . we use 'immunity' only when discussing potential liability and 'privilege' only when referring to evidentiary issues."); *Lindley v. Life Invs. Ins. Co. Am.*, No. 08-CV-379, 2009 WL 2245565, at *3 (N.D. Okla. July 24, 2009) (observing that although the two terms are sometimes "used interchangeably," "legislators' immunity from suit is [generally] referred to as 'legislative immunity,'" while "the evidentiary privilege accorded legislators is referred to as the 'legislative privilege'").

[52] *See, e.g.*, *Bethune-Hill*, 114 F. Supp. 3d at 331 ("[I]t is important to identify how legislative immunity and legislative privilege differ between federal and state legislators as to the source of the privileges, their purpose, and the degree of their protection.").

[53] *See infra* Section II.B.

[54] *See infra* Section II.C.

[55] *See, e.g.*, *Supreme Court of Virginia v. Consumers Union of U.S., Inc.*, 446 U.S. 719, 731 (1980) ("[T]he Speech or Debate Clause immunizes Congressmen from suits for either prospective relief or damages." (citing *Eastland v. U.S. Servicemen's Fund*, 421 U.S. 491, 502–03 (1975))).

[56] U.S. CONST. art. I, § 6, cl. 1.

To "[e]nsure that the legislative function may be performed independently without fear of outside interference,"[57] the Speech or Debate Clause shields Congresspersons not just "from the *consequences* of litigation's results"—such as monetary liability—"but also from the *burden of defending* themselves" from such suits in the first place.[58] In that respect, federal legislative immunity is very broad.[59]

a. *Eastland*

So, to illustrate, in *Eastland v. U.S. Servicemen's Fund*, a Subcommittee of the U.S. Senate subpoenaed a bank for information about a nonprofit organization.[60] The organization then sued several Members of that Subcommittee in an attempt to stop them from enforcing the subpoena.[61]

The Supreme Court ruled that the Speech or Debate Clause gave the Senators "complete immunity" from the organization's lawsuit.[62] The Court opined that the Clause serves two purposes:

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[57] *Supreme Court of Virginia*, 446 U.S. at 731.

[58] *Dombrowski v. Eastland*, 387 U.S. 82, 85 (1967) (emphases added).

[59] *See, e.g.*, *Eastland*, 421 U.S. at 501 ("Without exception, our cases have read the Speech or Debate Clause broadly to effectuate its purposes.").

But see, e.g., *Hughes v. Tarrant County*, 948 F.2d 918, 920 (5th Cir. 1991) ("Not all actions taken by an official with legislative duties . . . are protected by absolute immunity—only those duties that are functionally legislative.").

[60] 421 U.S. at 494.

[61] *Id.* at 495–96.

[62] *Id.* at 507.

(1) preserving the constitutional separation of powers between Congress and the Executive and Judicial Branches of the federal government;[63] and

(2) safeguarding legislative independence by shielding legislators from litigation that could divert their attention from[64]—and deter them from faithfully performing[65]—their legislative duties.

Reasoning that courts must "read the Speech or Debate Clause broadly to effectuate" those dual purposes, the *Eastland* Court held that so long as a federal legislator is acting "within the sphere of legitimate legislative activity," "the Speech or Debate Clause is an absolute bar" to lawsuits based on those activities.[66] Because the Subcommittee had issued the challenged subpoena pursuant to a congressional investigation regarding matters within the Subcommittee's jurisdiction, the Senators were conducting "legitimate legislative activit[ies]"—and, thus, the Speech or Debate Clause immunized the Senators from the organization's suit.[67]

The Supreme Court reached that conclusion even though the organization claimed that the Subcommittee was conducting the investigation not for a valid legislative purpose, but rather to deter the organization's members from exercising their constitutional rights.[68] The Court opined that when "determining the legitimacy of a congressional act" for federal legislative

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[63] *Id.* at 502.

[64] *See id.* at 503 ("Just as a criminal prosecution infringes upon the independence which the [Speech or Debate] Clause is designed to preserve, a private civil action, whether for an injunction or damages, creates a distraction and forces Members [of Congress] to divert their time, energy, and attention from their legislative tasks to defend the litigation. Private civil actions also may be used to delay and disrupt the legislative function.").

[65] *See id.* at 502 ("[T]he 'central role' of the [Speech or Debate] Clause is 'to prevent intimidation of legislators by the Executive and accountability before a possibly hostile judiciary.'" (quoting *Gravel*, 408 U.S. at 617)).

[66] *Id.* at 501–03 (quoting *Doe v. McMillan*, 412 U.S. 306, 312–13 (1973) [hereinafter *McMillan*]).

[67] *See id.* at 504–06.

[68] *See id.* at 508–11.

immunity purposes, courts should "not look to the motives alleged to have prompted" the challenged action.[69] The Court reasoned that if a "mere allegation that a valid legislative act was undertaken for an unworthy purpose" could "lift the protection of the [Speech or Debate] Clause, then the Clause simply would not provide the protection historically undergirding it"[70]—*i.e.*, would not safeguard legislative independence and the constitutional separation of powers.[71] The Court thus concluded that federal legislators "are immune from liability for their actions within the 'legislative sphere'"—even if "their conduct, if performed in other than legislative contexts, would in itself be unconstitutional or otherwise contrary to criminal or civil statutes."[72]

Thus, *Eastland*'s most important takeaway is that for the purposes of determining whether a plaintiff may *sue* a *federal* legislator, courts should not inquire into that legislator's motives and intent.[73] "[T]he Speech or Debate Clause protects against inquiry into" not just "*acts* that occur in the regular course of the legislative process," but also "the *motivation* for those acts."[74]

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[69] *Id.* at 508.

[70] *Id.* at 508–09.

[71] *See supra* notes 63–65 and accompanying text.

[72] *Eastland*, 421 U.S. at 510 (first quoting *Gravel*, 408 U.S. at 624–25; then quoting *McMillan*, 412 U.S. at 312–13).

[73] *Id.* at 508–10.

[74] *Id.* at 508 (quoting *United States v. Brewster*, 408 U.S. 501, 525 (1972)).

b. *Brewster*

That's not to say, of course, that the Speech or Debate Clause gives federal legislators *carte blanche* to break laws with impunity.[75] So long as "the Government's case does not rely on legislative acts or the motivation for legislative acts," "a Member of Congress may [still] be prosecuted" for violations of federal law.[76]

In *United States v. Brewster*, for example, the Supreme Court ruled that the Government could prosecute a former U.S. Senator for bribery because "[t]aking a bribe is . . . not, by any conceivable interpretation, an act performed as a part of or even incidental to the role of a legislator."[77] Thus, at least under the specific facts of *Brewster*, "no inquiry into legislative acts or motivation for legislative acts [was] necessary for the Government" to prove its case—and, as a consequence, the prosecution could proceed.[78]

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[75] *See, e.g.*, *Bethune-Hill*, 114 F. Supp. 3d at 332 ("Of course, this does not mean that federal legislators are immune from criminal or civil law in any general sense. Rather, the [Speech or Debate] Clause means that legislative activities may not constitute a basis for liability, either as the predicate of the cause of action or as evidence in support thereof." (citations omitted)); *Brewster*, 408 U.S. at 516 (emphasizing that the Speech or Debate Clause does not "make Members of Congress super-citizens, immune from criminal responsibility").

[76] *Brewster*, 408 U.S. at 512.

See also id. (defining a "legislative act" as "an act generally done in Congress in relation to the business before it"—*i.e.*, "things generally said or done in the House or the Senate in the performance of official duties"); *id.* at 512–13 (identifying acts that "are political in nature rather than legislative" and therefore don't enjoy "the protection afforded by the Speech or Debate Clause").

But see id. at 529 n.18 (leaving undecided whether "an inquiry that probe[d] into legislative acts or the motivation for legislative acts" would violate the Speech or Debate Clause "if Congress specifically authorize[d] such" an inquiry "in a narrowly drawn statute").

[77] *Id.* at 526.

[78] *Id.* at 525.

But see infra Section II.B.2.a (explaining that even when the Speech or Debate Clause doesn't prohibit the Government from *prosecuting* a federal legislator, it may still bar the Government from *introducing certain evidence* at the Congressperson's criminal trial).

2. Federal Legislative Privilege

Besides legislative *immunity*, the Speech or Debate Clause also grants federal legislators a legislative *privilege* that confers three distinct protections.[79]

First, the Clause confers an *evidentiary* privilege.[80] A Congressperson's legislative acts "may not be introduced into evidence even when the government seeks to punish [that legislator] for non-legislative acts."[81]

Second, the Clause provides at least some "protection against the *compelled disclosure of documents*."[82] Generally speaking, neither the U.S. Government nor a private litigant may "force Members to hand over documentary evidence of [their legislative] acts."[83]

Third, the Clause provides "a *testimonial* privilege" that typically bars litigants from "forc[ing] a Member [of the U.S. Congress] to testify about legislative acts."[84] Federal legislators enjoy that testimonial privilege "regardless of the Member's subjective motives" for taking the legislative act in question.[85]

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[79] *See, e.g.*, *In re Sealed Case*, 80 F.4th 355, 365 (D.C. Cir. 2023).

[80] *See, e.g.*, *id.*

[81] *Id.* (citing *Johnson*, 383 U.S. at 176–77).

[82] *E.g.*, *id.* (emphasis added).

[83] *E.g.*, *id.* (citing *United States v. Hubbell*, 530 U.S. 27, 40 (2000)).

[84] *E.g.*, *id.* (emphasis added) (citing *Gravel*, 408 U.S. at 616).

[85] *E.g.*, *id.* (citing *Tenney*, 341 U.S. at 377).

a. *Helstoski*

United States v. Helstoski illustrates the first of those three components of the federal legislative privilege—*i.e.*, the Speech or Debate Clause's prohibition against *introducing certain evidence* of a Congressperson's legislative activities in a judicial proceeding.[86]

The defendant in *Helstoski* was a former Congressperson whom the federal government charged with bribery.[87] Although the Supreme Court reaffirmed *Brewster*'s holding that the federal legislative *immunity* doctrine didn't bar the Government from *prosecuting* the Congressperson,[88] it also held that the federal legislative *privilege* barred the Government from *introducing evidence* of the Congressperson's "past legislative acts" at his criminal trial.[89] The Court reasoned that the Speech or Debate Clause "protects against inquiry into acts that occur in the regular course of the legislative process and into the motivation for those acts"—and thereby "precludes any showing" in a judicial proceeding "of how a [federal] legislator acted, voted, or decided."[90]

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[86] *See generally* 442 U.S. 477 (1979).

[87] *See id.* at 479.

[88] *See id.* at 487–88 (quoting *Brewster*, 408 U.S. at 512); *see also supra* Section II.B.1.b (analyzing *Brewster* in depth).

[89] *See* 442 U.S. at 487–89.

But see id. at 489–90 (reasoning that the Government could still introduce evidence of the Congressperson's "[p]romises . . . to perform an act in the *future*" because such promises "are not legislative acts" protected by the Speech or Debate Clause).

[90] *Id.* at 489 (quoting *Brewster*, 408 U.S. at 525, 527).

Thus, just as *Eastland* demonstrates that federal legislative *immunity* bars courts from scrutinizing federal legislators' motives for the purposes of determining whether they're immune *from suit or liability*,[91] *Helstoski* establishes that the federal legislative *privilege* may likewise bar litigants from *introducing evidence* bearing on the motivations underlying a Congressperson's legislative acts.[92]

b. *Gravel*

Whereas *Helstoski* elucidates the federal legislative privilege's *evidentiary* component, the Supreme Court's decision in *Gravel v. United States* bears on the privilege's other two components—*i.e.*, whether and when a Congressperson may resist demands to *disclose information* or *provide compulsory testimony* regarding his or her legislative activities.[93]

Gravel involved a U.S. Senator who read extensively from a top-secret Defense Department study at a congressional subcommittee meeting.[94] The Senator then placed the study in the public legislative record and arranged for publishers to publicly disseminate it.[95]

The federal government convened a grand jury to investigate whether the Senator's actions violated federal law.[96] In furtherance of that investigation, the Government subpoenaed one of the Senator's aides to testify before the grand jury.[97] The Senator moved to quash the

[91] *See supra* Section II.B.1.a.

[92] *See* 442 U.S. at 489.

[93] *See generally* 408 U.S. at 608–29.

[94] *Id.* at 609.

[95] *Id.* at 608–10.

[96] *Id.* at 608.

[97] *Id.* at 608–10.

subpoena, arguing that requiring his aide to appear and testify would violate the Speech or Debate Clause.[98]

In a passage that will become increasingly important below,[99] the Supreme Court deemed it "incontrovertible" that the Senator could "not be made to answer—either in terms of questions or in terms of defending himself from prosecution—for the events that occurred at the subcommittee meeting."[100] The Court therefore held that compelling the Senator—or, by extension, his aides—to answer questions about the subcommittee hearing in a criminal proceeding would "impinge upon or threaten the legislative process" and thereby contravene the federal legislative privilege.[101]

C. State Legislators and Federal Common Law

As the foregoing discussion demonstrates, the Speech or Debate Clause gives federal legislators immunity and privilege in roughly equal measure. By its plain terms, though, the federal Speech or Debate Clause applies to *federal* legislators *only*—it *doesn't* apply to *state*

[98] *Id.*

[99] *See infra* note 534 and accompanying text.

[100] 408 U.S. at 615–16.

[101] *Id.* at 616, 622.

legislators.[102] Thus, the U.S. Constitution doesn't *itself* confer any immunity or privilege upon state lawmakers.[103]

1. State Legislative Immunity

Nevertheless, as a matter of federal *common* law (rather than *constitutional* law), state legislators enjoy an immunity from suit and liability comparable to that which federal legislators possess under the Speech or Debate Clause.[104] Like federal legislative immunity, state legislative immunity is very broad; indeed, the Supreme Court has repeatedly described it as "absolute."[105]

a. *Tenney*

To illustrate, the plaintiff in a case called *Tenney v. Brandhove* alleged that certain members of the California Legislature had conducted an investigation not "for a legislative purpose," but rather "to intimidate and silence [him] and deter and prevent him from effectively

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[102] *See, e.g.*, *United States v. Gillock*, 445 U.S. 360, 366 n.5 (1980) (noting that, "by its terms," "the Federal Speech or Debate Clause . . . applies only to 'Senators and Representatives'" of the U.S. Congress, not to "state legislators"); *Lake Country Estates, Inc. v. Tahoe Reg'l Planning Agency*, 440 U.S. 391, 404 (1979) ("The Speech or Debate Clause of the United States Constitution is [not] applicable to the members of state legislatures . . . .").

Although many *state* constitutions contain analogues to the federal Speech or Debate Clause, those state constitutional protections don't apply where a plaintiff is raising claims in a federal court that arise exclusively under federal law. *See, e.g.*, *Favors I*, 285 F.R.D. at 208.

[103] *See, e.g.*, *Gillock*, 445 U.S. at 366 n.5; *Lake Country Estates*, 440 U.S. at 404.

[104] *See, e.g.*, *Supreme Court of Virginia*, 446 U.S. at 732–33 ("[S]tate legislators enjoy common-law immunity from liability for their legislative acts, an immunity that is similar in origin and rationale to that afforded Congressmen under the Speech or Debate Clause. . . . [W]e generally have equated the legislative immunity to which state legislators are entitled . . . to that accorded Congressmen under the Constitution." (citations omitted)).

[105] *See, e.g.*, *Bogan*, 523 U.S. at 54; *Supreme Court of Virginia*, 446 U.S. at 733–34.

exercising his constitutional rights."[106] Based on those allegations, the plaintiff sued those state legislators for monetary damages.[107]

Even though the Speech or Debate Clause didn't itself offer the state legislators any protection from the plaintiff's suit,[108] the Supreme Court nonetheless ruled that they enjoyed immunity from the plaintiff's claims under the common law.[109] Invoking the same sorts of legislative independence concerns that animate the Speech or Debate Clause,[110] the Court explained that "the principle that the legislature must be free to speak and act without fear of criminal and civil liability" had a long historical pedigree.[111] The Court therefore concluded that so long as state legislators are "acting in the sphere of legitimate legislative activity"—that is, so long as they're "acting in a field where legislators traditionally have power to act"—they aren't subject to civil liability for their conduct.[112] So, because the plaintiff in *Tenney* was trying to hold state legislators liable for their investigative activities, and because such investigations "are an established part of representative government," the Supreme Court ruled that the state legislators were immune from the plaintiff's suit.[113]

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[106] 341 U.S. at 369–71.

[107] *Id.* at 371.

[108] Although *Tenney* mentions the federal Speech or Debate Clause at various points, *see id.* at 372–73, the Supreme Court subsequently "made clear that [*Tenney*'s] holding was grounded on its interpretation of federal common law, not on the Speech or Debate Clause," *Gillock*, 445 U.S. at 372 n.10 (citing *Lake Country Estates*, 440 U.S. at 404).

[109] *See id.* at 372–79.

[110] *See supra* notes 64–65 and accompanying text.

[111] *See* 341 U.S. at 372–76.

[112] *Id.* at 376, 379.

[113] *Id.* at 377–78.

The *Tenney* Court reached that conclusion even though the plaintiff had accused the legislators of conducting their investigations for "an unworthy purpose."[114] The Court opined that state legislative immunity "would be of little value if [legislators] could be subjected to the cost and inconvenience and distractions of a trial upon a conclusion of the pleader, or to the hazard of a judgment against them based upon a jury's speculation as to motives."[115] The Court therefore remarked that it is "not consonant with our scheme of government for a court to inquire into the motives of legislators."[116]

The major takeaway from *Tenney* is that the *state* legislative immunity doctrine forbids courts from scrutinizing state lawmakers' motives for the purposes of determining whether they're immune from suit or liability[117]—just like the *federal* legislative immunity doctrine does for Members of the U.S. Congress.[118]

It's critical to emphasize, however, that *Tenney* was a state legislative *immunity* case, *not* a state legislative *privilege* case.[119] The plaintiff in *Tenney* wasn't trying to obtain documents or

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[114] *See id.* at 377.

[115] *Id.*

[116] *Id.*

[117] *Id.*

[118] *See supra* Section II.B.1.

[119] *See* 341 U.S. at 377 ("Legislators are *immune* from deterrents to the uninhibited discharge of their legislative duty . . . ." (emphasis added)).

See also, e.g., *Loesel v. City of Frankenmuth*, No. 08-11131, 2010 WL 456931, at *6 (E.D. Mich. Feb. 4, 2010) ("*Tenney* . . . addressed immunity from suit, not an evidentiary privilege that would prevent a state legislator from testifying at a deposition or trial."); *Fla. Ass'n of Rehab. Facilities, Inc. v. Fla. Dep't Health & Rehab. Servs.*, 164 F.R.D. 257, 262 (N.D. Fla. 1995) ("*Tenney* concerned only immunity from suit, not a state legislative evidentiary privilege."); *Whitford v. Gill*, 331 F.R.D. 375, 378 (W.D. Wis.) ("*Tenney* was not about a privilege against testifying or complying with discovery requests, which [are] less burdensome and intrusive than being a defendant in a lawsuit."), *vacated on other grounds*, 2019 WL 4571109 (7th Cir. 2019).

compel testimony from the legislator defendants; nor was he trying to introduce evidence of protected legislative activities into the record of a judicial proceeding.[120] Instead, he was trying to hold legislators liable for monetary damages.[121]

Thus, for reasons that will become increasingly clear below, *Tenney*'s proclamation that it's "not consonant with our scheme of government for a court to inquire into the motives of legislators"[122] only categorically prohibits courts from inquiring into legislative motives for the purposes of determining whether a state legislator is *immune from suit or liability*.[123] *Tenney* *doesn't* categorically prohibit litigants from merely *obtaining evidence* bearing on state legislature's motives—especially where those motives are a key issue in the case.[124]

That remains true even though the *Tenney* Court used the word "privilege" several times in its opinion.[125] Context makes clear that the Court (perhaps imprecisely) was using "privilege" as a generic shorthand to refer to *immunity from suit and liability*, as opposed to a privilege against complying with demands for *documentary or testimonial evidence*.[126]

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[120] *See* 341 U.S. at 369–79.

[121] *See id.* at 371.

[122] *See id.* at 377.

[123] *See infra* Section II.C.2.a.

[124] *See infra* Section II.C.2.a.

[125] *See, e.g.*, 341 U.S. at 373 ("The reason for the *privilege* is clear." (emphasis added)); *id.* at 377 ("The claim of an unworthy privilege does not destroy the *privilege*." (emphasis added)); *id.* at 378 ("We have only considered the scope of the *privilege* as applied to the facts of the present case." (emphasis added)).

[126] *See, e.g.*, *id.* at 372–77 (discussing the historical antecedents of "[t]he *privilege* of legislators to be free *from arrest or civil process* for what they do or say in legislative proceedings" (emphases

b. *Bogan*

The Supreme Court expanded upon *Tenney*'s holdings when it decided *Bogan v. Scott-Harris* several decades later.[127] The plaintiff in *Bogan* sued various local[128] legislators for eliminating her position as the administrator of a city agency—a decision that, according to the plaintiff, the legislators allegedly based on "racial animus and a desire to retaliate against her for exercising her First Amendment rights."[129]

The Court reaffirmed *Tenney*'s holding that, at least for the purposes of determining whether a legislator is immune from suit, "it simply is 'not consonant with our scheme of government for a court to inquire into the motives of legislators.'"[130] Thus, even though the plaintiff in *Bogan* had accused the lawmakers of making legislative decisions for racially discriminatory reasons, the lawmakers were nevertheless "entitled to absolute legislative immunity" from the plaintiff's claims.[131] Thus, for the purposes of this dissent, the most important takeaway from *Bogan* is that state legislators remain immune from suit and liability

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added)); *id.* at 377 ("The *privilege* would be of little value if [legislators] could be subjected to . . . the hazard of a *judgment against them* based upon a jury's speculation as to motives." (emphases added)).

See also supra Section II.A (noting that courts have occasionally used the term "privilege" as a catch-all term to refer to both legislative immunity and the legislative privilege).

[127] *See* 523 U.S. at 48–56.

[128] *Bogan* also held that local lawmakers enjoy legislative immunity to the same degree as their state counterparts. *See id.* at 49. This dissent will therefore use the term "state legislative immunity" as a shorthand for "state *and local* legislative immunity."

[129] *Id.* at 47.

[130] *Id.* at 55 (quoting *Tenney*, 341 U.S. at 377); *see also id.* at 54 (reaffirming *Tenney*'s admonition that "[t]he privilege of absolute immunity 'would be of little value if legislators could be subjected to the cost and inconvenience and distractions of trial upon a conclusion of the pleader, or to the hazard of a judgment against them based upon a jury's speculation as to motives'" (cleaned up) (quoting *Tenney*, 341 U.S. at 377)).

[131] *Id.* at 56 n.6.

even when a plaintiff accuses them of exercising their legislative powers in racially discriminatory ways.[132]

Here too, though, it's critical to emphasize that *Bogan*—like *Tenney*—was a legislative *immunity* case, *not* a legislative *privilege* case.[133] The issue in *Bogan* wasn't whether the plaintiff could obtain *documents or testimony* from non-party legislators; it was instead whether the plaintiff could *hold legislators liable* for their legislative acts.[134] And that remains true even though the *Bogan* Court twice used the word "privilege" as a generic shorthand for "[t]he privilege *of absolute immunity*."[135]

Thus, for reasons explained below, *Bogan*'s admonition that it's "not consonant with our scheme of government for a court to inquire" into whether state lawmakers took legislative acts for racially discriminatory reasons means only that plaintiffs can't *hold those lawmakers liable* based on their motivations.[136] It doesn't—and can't—mean that courts may never inquire whether a state legislature intentionally discriminated on the basis of race when it passed a law, or that litigants may never obtain evidence bearing directly on that question.[137]

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[132] *See id.* at 47–55.

[133] *See, e.g.*, *id.* at 46 ("[L]egislators are entitled to absolute *immunity* from *civil liability* for their legislative activities." (emphases added)).

[134] *See id.* at 46–56; *see also, e.g.*, *Rodriguez*, 280 F. Supp. 2d at 95 (identifying *Bogan* as a legislative immunity case rather than a legislative privilege case).

[135] *See* 523 U.S. at 54; *see also id.* at 48 (describing "[t]he principle that legislators are *absolutely immune* from *liability* for their legislative activities" as a "*privilege*" that has "long been recognized in Anglo-American law" (emphases added)).

[136] *See infra* Section II.C.2.a.

[137] *See infra* Section II.C.2.a.

2. State Legislative Privilege

That finally brings us to the state legislative *privilege*—the only one of the four doctrines at issue in our case. The privilege offers state legislators[138] at least some protection "from compelled disclosure of documentary and testimonial evidence with respect to actions within the scope of legitimate legislative activity."[139]

Like state legislative *immunity*, state legislative *privilege* is a creation of federal common law, rather than a constitutional guarantee under the federal Speech or Debate Clause.[140] The privilege thus applies in federal question cases by virtue of Federal Rule of Evidence 501,[141] which provides (with exceptions not relevant here) that "[t]he common law—as interpreted by United States courts in the light of reason and experience—governs a claim of privilege" in the federal courts.[142]

Notably, *municipal* legislators also enjoy a legislative privilege to the same extent as their state counterparts.[143] The Fifth Circuit has therefore used the term "state legislative privilege" as a shorthand for "state *and local* legislative privilege," and has frequently cited municipal

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[138] At least in some circumstances, legislative *staffers* enjoy the state legislative privilege's protections as well. *See, e.g.*, *Page v. Va. State Bd. of Elections*, 15 F. Supp. 3d 657, 664 (E.D. Va. 2014).

[139] *Favors I*, 285 F.R.D. at 209; *see also, e.g.*, *League of Women Voters of Mich. v. Johnson*, No. 17-14148, 2018 WL 2335805, at *3 (E.D. Mich. May 23, 2018).

[140] *E.g.*, *Hughes 5th Cir. Op.*, 68 F.4th at 235.

[141] *E.g.*, *id.* ("Legislative privilege is an evidentiary privilege governed by federal common law, as applied through Rule 501 of the Federal Rules of Evidence." (cleaned up) (quoting *Jefferson Cmty.*, 849 F.3d at 624)).

[142] FED. R. EVID. 501.

[143] *See, e.g.*, *McDonough v. City of Portland*, No. 2:15-cv-153, 2015 WL 12683663, at *1 (D. Me. Dec. 31, 2015) (stating that "a municipal lawmaker may invoke a legislative privilege" under "federal common law" just like a state lawmaker can, and that the privilege is "qualified" no matter whether it's "invoked by a state or municipal lawmaker").

legislative privilege cases for propositions about the state legislative privilege (and *vice versa*).[144] This dissent will therefore treat the state and local legislative privilege—and cases applying each—as effectively interchangeable.

Critically, however, while the *municipal* and state legislative privileges are effectively coextensive, the *federal* and state legislative privileges are not.[145] Unlike state legislative *immunity*—which is comparable in scope to *federal* legislative immunity and is therefore relatively broad[146]—the state legislative *privilege* is significantly narrower than both state legislative *immunity* and the *federal* legislative privilege.[147]

a. Supreme Court Precedent

To understand why that's so, one must first trace the state legislative privilege's historical development.

i. *Arlington Heights*

The starting point is *Arlington Heights*. The plaintiffs there sued a village for denying a rezoning request that would have authorized the plaintiffs to build low- and moderate-income multifamily housing on a parcel of land.[148] The plaintiffs claimed that the Village's decision was

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[144] *See, e.g.*, *League of United Latin Am. Citizens v. Abbott*, No. 22-50407, 2022 WL 2713263, at *1–2 (5th Cir. May 20, 2022) [hereinafter *LULAC 5th Cir. Op.*] (citing case involving *municipal* legislators (namely *Jefferson Community*, 849 F.3d at 624) for the proposition that "the *state* legislative privilege is not absolute"); *Jefferson Cmty.*, 849 F.3d at 624 (applying "the legislative privilege for *state* lawmakers" to a legislative privilege claim by *municipal* councilmembers (emphasis added) (quoting *Perez*, 2014 WL 106927, at *2)).

[145] *See infra* Section II.C.2.a.

[146] *See supra* Section II.C.1.

[147] *See infra* Section II.C.2.a.

[148] *See* 429 U.S. at 254.

racially discriminatory, and thus that it violated the Fourteenth Amendment's Equal Protection Clause.[149]

As noted above,[150] *Arlington Heights* explains that "[d]etermining whether invidious discriminatory purpose was a motivating factor" for a governmental action "demands a sensitive inquiry into such circumstantial and direct evidence of intent as may be available."[151] Among other pertinent considerations,[152] the challenged decision's "legislative . . . history may be highly relevant" to the question of whether the legislature acted with discriminatory intent—"especially where there are contemporary statements by members of the decisionmaking body, minutes of its meetings, or reports."[153]

More importantly for our purposes, however, *Arlington Heights* also holds that plaintiffs seeking evidence of discriminatory motives in a state or local statute's legislative history aren't necessarily limited to statements in the public legislative record.[154] To the contrary, *Arlington Heights* explicitly states that "[i]n some extraordinary instances," state and municipal lawmakers "might be called to the stand at trial to testify concerning the purpose of the [challenged] action."[155] *Arlington Heights* thereby indicates that, in at least some circumstances, the state

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[149] *See id.*

See also U.S. CONST. amend. XIV, § 1 ("No State shall . . . deny to any person within its jurisdiction the equal protection of the laws.").

[150] *See supra* Section I.

[151] 429 U.S. at 266.

[152] *See id.* at 266–68.

[153] *Id.* at 268.

[154] *See id.*

[155] *Id.*

legislative privilege won't shield a legislator from the obligation to testify in a federal judicial proceeding about the motives underlying a legislative enactment.[156]

Arlington Heights therefore necessarily implies that the prohibition against scrutinizing legislative motives for *federal* legislative privilege purposes doesn't apply with equal force in the *state* legislative privilege context. As discussed, the *federal* legislative privilege shields federal lawmakers from "inquir[ies] into acts that occur in the regular course of the legislative process *and into the motivation for those acts*."[157] *Arlington Heights*, however, demonstrates that when evaluating "whether invidious discriminatory purpose was a motivating factor" behind a *state or local* legislative enactment,[158] the state legislative privilege doesn't categorically forbid litigants from calling lawmakers "to the stand at trial to testify concerning the purpose of the [challenged] action."[159]

By the same token, *Arlington Heights* also teaches that the state legislative *immunity* doctrine's absolute bar against scrutinizing legislative motives isn't directly transferrable to the state legislative *privilege* context either. *Bogan* and *Tenney*, as the reader will recall, hold that when determining whether a state legislator enjoys "[a]bsolute legislative *immunity*" from suit and liability for "actions taken 'in the sphere of legitimate legislative activity,'" courts shouldn't examine that legislator's "motive or intent."[160] That's because "absolute immunity 'would be of

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[156] *See id.*

[157] *See Helstoski*, 442 U.S. at 489 (emphasis added) (quoting *Brewster*, 408 U.S. at 512); *see also supra* Section II.B.2.

[158] *See* 429 U.S. at 266.

[159] *See id.* at 268.

[160] *See Bogan*, 523 U.S. at 54 (emphasis added) (quoting *Tenney*, 341 U.S. at 376); *see also supra* Section II.C.1.

little value of legislators could be subjected to . . . the hazard of a *judgment* against them based upon a jury's speculation as to motives.'"[161]

But that doesn't mean that courts may *never* inquire into a state legislature's motives or intent. That's because *Arlington Heights* explicitly states that "[p]roof of racially discriminatory intent or purpose" is in fact "*required* to show a violation of the Equal Protection Clause."[162] *Arlington Heights* thus establishes that so long as a litigant isn't trying to *sue* or hold a state legislator individually *liable* for her legislative acts—that is, so long as that litigant isn't trying to overcome a state lawmaker's legislative *immunity*—the state legislative *privilege* doesn't necessarily bar that litigant from calling a *nonparty* state legislator "to the stand at trial to testify concerning the purpose of [a legislative] action."[163] Accordingly, many District Judges—including judges presiding over redistricting cases—have cited *Arlington Heights* for the proposition that the state legislative privilege doesn't categorically shield state legislators from the obligation to produce documents or provide testimony regarding the motivations underlying a legislative enactment.[164]

That's not to say, of course, that the state legislative privilege is toothless, or that state legislators must provide involuntary testimony or disclose internal legislative documents whenever a litigant demands it. To the contrary, *Arlington Heights* explicitly acknowledges "that

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[161] *Bogan*, 523 U.S. at 54 (emphasis added) (quoting *Tenney*, 341 U.S. at 377).

[162] 429 U.S. at 265 (emphasis added).

[163] *Id.* at 268.

[164] *See, e.g.*, *Rodriguez*, 280 F. Supp. 2d at 95–96 (redistricting case citing *Arlington Heights* for the proposition that "notwithstanding their immunity from suit, legislators may, at times, be called upon to produce documents or testify at depositions"); *Marylanders*, 144 F.R.D. at 304 (opinion of Murnaghan, J. & Motz, J.) (redistricting case citing *Arlington Heights* for the proposition that the state legislative privilege "does not . . . necessarily prohibit judicial inquiry into legislative motive where the challenged legislative action is alleged to have violated an overriding, free-standing public policy").

judicial inquiries into legislative . . . motivation represent a substantial intrusion into the workings of other branches of government," and that "[p]lacing a [state legislator] on the stand is therefore 'usually to be avoided.'"[165] Thus, while *Arlington Heights* contemplates that state lawmakers "might be called to the stand at trial to testify concerning the purpose of [an] official action" in "*extraordinary* instances," the case also cautions that "such testimony frequently will be barred by privilege" in the mine run of cases.[166] Still, even with those caveats, *Arlington Heights* explicitly contemplates that, in some nonzero number of cases, the legislative privilege won't relieve a state legislator of the obligation to provide compelled testimony regarding the motives underlying a state law.[167]

Indeed, the trial court in *Arlington Heights* *itself* let the plaintiffs obtain discovery from legislators and call at least one legislator to the stand at trial—though, admittedly, one might draw competing inferences from that fact given the case's peculiar procedural posture. As noted, the plaintiffs in *Arlington Heights* alleged that the Village's denial of their rezoning request was racially discriminatory, and therefore violated the Fourteenth Amendment's Equal Protection Clause.[168] At the time *Arlington Heights* proceeded to trial, however, the Supreme Court hadn't yet decided *Washington v. Davis*,[169] which held that a plaintiff must prove racially discriminatory *intent*—and not merely a racially disproportionate *impact*—to prevail on an Equal Protection

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[165] 429 U.S. at 268 n.18 (quoting *Citizens to Preserve Overton Park v. Volpe*, 401 U.S. 402, 420 (1971)).

[166] *See id.* at 268 (emphasis added).

[167] *See id.*

[168] *Metro. Hous. Dev. Corp. v. Village of Arlington Heights*, 517 F.2d 409, 410, 412 (7th Cir. 1975) [hereinafter *Arlington Heights 7th Cir. Op.*], *rev'd*, *Arlington Heights S. Ct. Op.*, 429 U.S. 252.

[169] 426 U.S. 229.

Clause claim.[170] Thus, as existing Circuit-level precedent then permitted,[171] the *Arlington Heights* plaintiffs litigated their case "on the . . . theory that the Village's refusal to rezone carried a racially discriminatory *effect* and was, without more, unconstitutional."[172]

By the time the case reached the Supreme Court, however, *Davis* had become binding precedent—which foreclosed the *Arlington Heights* plaintiffs from relying exclusively on discriminatory effect like they did in the district court.[173] The plaintiffs therefore needed to change their theory of the case midstream and argue that the municipality had acted with discriminatory *intent*.[174]

The problem, of course, was that the evidentiary record that the plaintiffs had developed at trial focused almost exclusively on whether the municipality's action had a discriminatory *effect*.[175] Because the plaintiffs had "repeated[ly] insist[ed] that it was effect and not motivation which would make out a constitutional violation," the district court largely forbade the plaintiffs

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[170] *Arlington Heights S. Ct. Op.*, 429 U.S. at 264–65, 268 ("Our decision last Term in *Washington v. Davis* made it clear that official action will not be held unconstitutional solely because it results in a racially disproportionate impact. . . . Proof of racially discriminatory intent or purpose is required to show a violation of the Equal Protection Clause. . . . This case was tried in the District Court and reviewed in the Court of Appeals before our decision in *Washington v. Davis* . . . ." (citations omitted)).

[171] *See Metro. Hous. Dev. Corp. v. Village of Arlington Heights*, 373 F. Supp. 208, 210 (N.D. Ill. 1974) [hereinafter *Arlington Heights Dist. Ct. Op.*] ("The crucial fact question . . . is whether the *result* of the defendant trustees' action caused racial discrimination. As [the Seventh Circuit had previously held in a case preceding *Washington v. Davis*], *motives are irrelevant* if the *effect* is illegal." (emphases added) (citing *Gautreaux v. Romney*, 448 F.2d 731, 738 (7th Cir. 1971))), *rev'd*, *Arlington Heights 7th Cir. Op.*, 517 F.2d 409, *rev'd*, *Arlington Heights S. Ct. Op.*, 429 U.S. 252; *Arlington Heights 7th Cir. Op.*, 517 F.2d at 413 ("*Regardless of the Village Board's motivation*, if this alleged discriminatory *effect* exists, the decision violates the Equal Protection Clause unless the Village can justify it by showing a compelling interest." (emphases added) (citing *Burton v. Wilmington Parking Auth.*, 365 U.S. 715, 725 (1963))).

[172] *Arlington Heights S. Ct. Op.*, 429 U.S. at 268 (emphasis added).

[173] *See id.* at 268, 270 n.20.

[174] *See id.* at 264–65.

[175] *Id.* at 268, 270 n.20.

from "questioning Board members about their motivation at the time they cast their votes."[176] Consequently, the trial record contained "no direct evidence by which to determine the [local legislators'] motives or mental processes."[177] Nor did the trial record contain other evidence of intent that would have sufficed to support an intentional discrimination finding.[178]

The plaintiffs thus needed to convince the Supreme Court that they never had a fair chance to obtain and introduce evidence of the Village's intent. They therefore complained to the Supreme Court that the trial court had "unduly limited their efforts to prove that the Village Board acted for discriminatory purposes" by forbidding them from "questioning Board members about their motivation at the time they cast their votes."[179]

The Supreme Court ruled, however, that it "was not improper" for the trial court to "forb[id] questioning Board members about their motivation[s]" because the plaintiffs had "repeated[ly] insiste[d]" at trial "that it was *effect*"—"and not motivation"—"which would make out a constitutional violation."[180] At the same time, though, the Supreme Court suggested that if the plaintiffs *hadn't* "repeated[ly] insist[ed]" on trying the suit as a discriminatory effect case, "*an inquiry into motivation would otherwise have been proper*."[181] That potentially suggests that, notwithstanding the Court's warning just two footnotes earlier that "[p]lacing a

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[176] *Id.* at 270 n.20.

[177] *Arlington Heights 7th Cir. Op.*, 517 F.2d at 210.

[178] *See Arlington Heights S. Ct. Op.*, 429 U.S. at 270 (ultimately concluding that the plaintiffs "failed to carry their burden of proving that discriminatory purpose was a motivating factor in the Village's decision").

[179] *Id.* at 270 n.20.

[180] *Id.* (emphasis added)

[181] *See id.* (emphasis added).

decisionmaker on the stand" is "*usually* to be avoided,"[182] the Court nonetheless believed that the intentional racial discrimination claims in *Arlington Heights* might have presented an appropriate circumstance to let the plaintiffs question the lawmakers about their motivations if the plaintiffs had instead argued that intent (rather than effect) was what mattered.[183]

The Supreme Court further suggested that part of the reason why it was acceptable for the district court to "forb[id] questioning Board members about their motivation at the time they cast their votes" was because the plaintiffs "were allowed, both during the discovery phase and at trial, to question Board members fully about *materials and information available to them at the time of [the challenged zoning] decision*"—a fact the Supreme Court noted without any apparent disapproval.[184] The fact that the *Arlington Heights* Court apparently "endorsed the plaintiff[s'] questioning of Board members 'about materials and information available to them at the time of decision'" therefore arguably "suggests that the Court did not view the Board members' privilege as absolute."[185]

Besides letting the *Arlington Heights* plaintiffs ask legislators certain questions during *discovery*, the trial court also let the plaintiffs "call[] one member of the Village Board to the stand at *trial*."[186] Notably, when the Supreme Court mentioned that fact in its opinion, it didn't suggest that the trial court's decision to do so was in any way inconsistent with the Court's pronouncement just a few pages earlier that "[p]lacing a decisionmaker on the stand is

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[182] *See id.* at 268 n.18 (emphasis added) (quoting *Volpe*, 401 U.S. at 420).

[183] *See id.* at 270 n.20.

[184] *See id.* (emphases added).

[185] *See Benisek*, 241 F. Supp. 3d at 574 n.8 (quoting *Arlington Heights S. Ct. Op.*, 429 U.S. at 270 n.20).

[186] *Arlington Heights S. Ct. Op.*, 429 U.S. at 270 (emphasis added).

. . . 'usually to be avoided.'"[187] Instead, the Court merely analyzed whether anything in the Board member's testimony "support[ed] an inference of invidious purpose."[188]

Thus, while it's admittedly hazardous to read too much into *Arlington Heights* either way,[189] the case arguably implies that the intentional discrimination claims at issue in *Arlington Heights* may have presented exactly the sort of "extraordinary instances" in which the legislative privilege yields.[190] Coming at it from the other direction, if the Supreme Court thought that *Arlington Heights* wasn't an "extraordinary" case, and that the trial court therefore breached the legislative privilege by letting the plaintiffs question the lawmakers during discovery and at trial, then the Supreme Court presumably would have chided the trial court for contravening the general principle that such questioning is "usually to be avoided."[191] But the Supreme Court didn't do that; it instead dispassionately assessed whether anything in the legislator's "testimony support[ed] an inference of invidious purpose."[192] Likewise, if the Supreme Court thought that the legislative privilege categorically barred the *Arlington Heights* plaintiffs from questioning lawmakers about their motives, the Court presumably wouldn't have suggested in a footnote that

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[187] *See id.* at 268 n.18; *see also id.* at 268 (opining that such testimony "frequently will be barred by privilege").

[188] *See id.* at 270.

See also Benisek, 241 F. Supp. 3d at 574 n.8 (inferring from that fact that "*Arlington Heights* counsels against recognizing an absolute privilege" in redistricting cases).

[189] *See Kay v. City of Rancho Palos Verdes*, No. CV 02-03922, 2003 WL 25294710, at *10 n.3 (C.D. Cal. Oct. 10, 2003) ("A footnote in *Arlington Heights* shows that the local legislators there were deposed about their consideration of the allegedly racist zoning law that was the focus of the case, although the holding does not directly address whether privilege might have barred the taking of those depositions in the first place." (citing *Arlington Heights S. Ct. Op.*, 429 U.S. at 270 n.20)).

[190] *See Arlington Heights S. Ct. Op.*, 429 U.S. at 268.

[191] *See id.* at 268 n.18.

[192] *See id.* at 270.

"an inquiry into motivation would otherwise have been proper" if the plaintiffs hadn't insisted on litigating their suit as a discriminatory effect case.[193]

Arlington Heights also arguably implies that even in those intentional discrimination cases where it's appropriate to prohibit plaintiffs from directly questioning legislators "about their *motivation* at the time they cast their votes," the court still should at least let the plaintiffs question legislators "about *materials and information* available to them at the time of [the challenged] decision" "both during the discovery phase and at trial."[194]

But even if the reader disagrees with that reading of *Arlington Heights*, and instead believes that the opinion doesn't imply anything either way about whether the plaintiffs' intentional racial discrimination claims presented the sort of "extraordinary instances" in which the state legislative privilege yields,[195] one thing remains indisputable: *Arlington Heights* expressly and unequivocally holds that there are at least *some* intentional discrimination cases where plaintiffs may call state legislators "to the stand at trial to testify concerning the purpose of [an] official action" notwithstanding the state legislative privilege.[196] Even though "[p]lacing a

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[193] *See id.* at 270 n.20.

[194] *See id.* (emphases added).

Contra Majority Op., 2023 WL 8880313, at *3 (failing to acknowledge that footnote from *Arlington Heights*, and (perhaps for that reason) reaching the opposite conclusions that (1) "[t]he legislative privilege protects the possession, preparation, or review of factual information when disclosure would inevitably reveal the legislator's deliberations" and (2) "material the legislator obtained, or declined to obtain, in the decision-making process is privileged too insofar as it is sought from the legislator" (quoting *In re Sealed Case*, 121 F.3d 729, 737 (D.C. Cir. 1997) [hereinafter *1997 Sealed Case*])).

[195] *See Dyas v. City of Fairhope*, No. 08-0232, 2009 WL 3151879, at *9 n.9 (S.D. Ala. Sept. 24, 2009) (reaching the contrary conclusion that "the *Arlington Heights* Court did not approve, much less require, the pretrial examination of the legislators that occurred in that case," but instead "simply stated that, given the degree of that [pretrial] discovery, the trial court did not unduly restrict the plaintiffs' case by precluding them from questioning the legislators at trial about their motivations").

[196] *Arlington Heights S. Ct. Op.*, 429 U.S. at 268.

decisionmaker on the stand is . . . *usually* to be avoided" because it "represent[s] a substantial intrusion into the workings of other branches of government,"[197] *Arlington Heights* nonetheless contemplates a subset of "extraordinary" cases in which the privilege won't foreclose litigants from obtaining testimonial or documentary evidence from state legislatures.[198]

ii. *Trammel*

The Supreme Court's decision in *Trammel v. United States* further confirms the state legislative privilege's comparatively narrow scope.[199] Although *Trammel* wasn't a state legislative privilege case *per se*,[200] its holdings about common law evidentiary privileges more generally belie the Texas Legislators' notion that the state legislative privilege is as expansive as they claim.[201] In relevant part, *Trammel* states that because "[t]estimonial exclusionary rules and privileges contravene the fundamental principle that the public has a right to every man's evidence," such privileges "must be strictly construed and accepted only to the very limited extent that permitting a refusal to testify or excluding relevant evidence has a public good transcending the normally predominant principle of utilizing all rational means for ascertaining truth."[202]

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[197] *Id.* at 268 n.18 (cleaned up) (emphasis added) (quoting *Volpe*, 401 U.S. at 420).

[198] *See id.* at 268.

[199] 445 U.S. 40 (1980).

[200] The issue in *Trammel* was "whether an accused may invoke the privilege against adverse spousal testimony so as to exclude the voluntary testimony of his wife" in a criminal proceeding. *Id.* at 41–42.

[201] *Compare* State Defs.' & Legis. Subpoena Recipients' Suppl. Br. at 3 (urging us to reject "Plaintiffs' arguments that the legislative privilege should be strictly construed"), *with Trammel*, 445 U.S. at 50 ("Testimonial exclusionary rules and privileges . . . must be strictly construed . . . .").

[202] 445 U.S. at 50 (cleaned up) (first quoting *United States v. Bryan*, 339 U.S. 323, 331 (1950); then quoting *Elkins v. United States*, 364 U.S. 206, 234 (1960) (Frankfurter, J., dissenting)).

Many lower courts—including courts presiding over redistricting cases—have understood *Trammel*'s disfavor towards common-law testimonial privileges more generally to apply to the common-law state legislative privilege specifically.[203] In other words, courts have routinely cited *Trammel* for the proposition that the state legislative privilege—like other evidentiary privileges—"must be strictly construed," and that it therefore applies only in the unusual circumstance in which "permitting a refusal to testify or excluding relevant evidence" would promote some overriding "public good."[204]

iii. *Gillock*

Just a few weeks after *Trammel*, the Supreme decided *United States v. Gillock*, which further confirms that the state legislative privilege yields in several circumstances in which the *federal* legislative privilege and state legislative *immunity* do not.[205]

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[203] *See infra* note 204.

[204] *See Comm. for a Fair & Balanced Map*, 2011 WL 4837508, at *7 (citing the above-quoted passage from *Trammel* to support the conclusion that "non-party state lawmakers" did not enjoy an "absolute" privilege under the federal common law "that protects them from producing documents in federal redistricting cases").

See also Nashville Student Org. Comm., 123 F. Supp. 3d at 969 ("In cases involving constitutional challenges related to voting rights, the vast majority of federal courts have found that the federal common law also affords state legislators only a qualified (*i.e.*, not absolute) legislative privilege against having to provide records or testimony concerning their legislative activity. Indeed, many of these courts have indicated that *the legislative privilege, like all evidentiary privileges, must be strictly construed and accepted only to the very limited extent that permitting a refusal to testify or excluding relevant evidence has a public good transcending the normally predominant principle of utilizing all rational means for ascertaining truth*." (emphasis added) (cleaned up) (citations omitted)).

See also, e.g., *Rodriguez*, 280 F. Supp. 2d at 94 (another redistricting case citing *Trammel* for the proposition that the state legislative privilege must be strictly construed); *Page*, 15 F. Supp. 3d at 660 (similar); *Favors I*, 285 F.R.D. at 209 (similar); *Perez*, 2014 WL 106927, at *1 (similar); *Benisek*, 241 F. Supp. 3d at 574 (similar).

See also, e.g., *Fla. Ass'n*, 164 F.R.D. at 261–62 (non-redistricting case citing *Trammel* for a similar purpose); *In re Grand Jury*, 821 F.2d 946, 955 (3d Cir. 1987) (same).

[205] *See generally* 445 U.S. 360.

The defendant in *Gillock* was a state senator whom the federal government accused of exploiting his legislative office to obtain bribes and other ill-gotten gains.[206] The defendant moved to forbid the Government from introducing any "evidence relating to his legislative activities" at his criminal trial.[207]

The Supreme Court first noted that if the defendant had instead been a *federal* legislator, the Speech or Debate Clause would have rendered much of that evidence inadmissible.[208] As the Court had previously ruled in *Helstoski*, the Speech or Debate Clause shields federal legislators "against inquiry into acts that occur in the regular course of the legislative process and into the motivation for those acts"—and, thus, "precludes any showing of how a [federal] legislator acted, voted, or decided."[209] "Under that standard," much of the evidence that the prosecution sought to introduce at Gillock's criminal trial—namely, "evidence of [his] participation in . . . state senate committee hearings and his votes and speeches on the floor"—"would be privileged and hence inadmissible."[210]

Again, though, the Speech or Debate Clause *doesn't* apply to *state* legislators.[211] Gillock therefore couldn't invoke the Clause to shield his legislative activities from scrutiny.[212] Thus, he

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[206] *Id.* at 362.

[207] *Id.* at 362–65.

[208] *See id.* at 366–67.

[209] *Helstoski*, 442 U.S. at 489 (cleaned up) (quoting *Brewster*, 408 U.S. at 525, 527); *see also supra* Section II.B.2.a (discussing *Helstoski* in depth).

[210] *Gillock*, 445 U.S. at 367.

[211] *See supra* notes 102–103 and accompanying text.

[212] *Gillock*, 445 U.S. at 366 n.5 ("Gillock makes no claim that state legislators are entitled to the benefits of the Federal Speech or Debate Clause, which by its terms applies only to 'Senators and Representatives.'" (citing *Lake Country Estates*, 440 U.S. at 404)); *id.* at 374 ("The Federal Speech or

instead urged the Supreme Court to recognize a *common-law* evidentiary privilege for state legislators comparable to the *constitutional* privilege that federal legislators enjoy.[213]

The Court declined to do so.[214] Citing *Eastland*, the Court reiterated that "[t]wo interrelated rationales underlie the [federal] Speech or Debate Clause:"

> (1) preserving the separation of powers between the three branches of the federal government; and
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> (2) promoting legislative independence.[215]

The Court determined that the first of those two rationales—the federal separation of powers—didn't support an analogous privilege for state legislators.[216] The Court reasoned that whereas the U.S. Constitution designates *Congress* as a separate and coequal branch of the *federal* government, "federal interference in the *state* legislative process is not on the same constitutional footing" because "federal enactments . . . prevail over competing state exercises of power" under the Constitution's Supremacy Clause.[217] Thus, the Court opined, "under our

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Debate Clause, of course, is a limitation on the Federal Executive, but by its terms is confined to federal legislators.").

[213] *Id.* at 366, 368.

[214] *See id.* at 368–74.

[215] *Id.* at 369 (citing *Eastland*, 421 U.S. at 502–03); *see also supra* notes 63–65 and accompanying text.

[216] 445 U.S. at 370.

[217] *Id.* (emphasis added).

See also U.S. CONST. art. VI, cl. 2 (the Constitution's Supremacy Clause, which provides that the "Constitution, and the Laws of the United States which shall be made in Pursuance thereof; and all Treaties made, or which shall be made, under the Authority of the United States, shall be the supreme Law of the Land; and the Judges in every State shall be bound thereby, any Thing in the Constitution or Laws of any State to the Contrary notwithstanding.").

federal structure, we do not have the struggles for power between the federal and state systems such as" those that "inspired the need for the Speech or Debate Clause."[218]

That left the second possible rationale for the defendant's proposed privilege: legislative independence.[219] "[R]el[ying] heavily on *Tenney*['s]" pronouncement that state legislative *immunity* is a necessary bulwark against "disruption of the state legislative process," the defendant urged the Court to adopt an *evidentiary privilege* of comparable breadth to avoid "interference with the functioning of state legislators."[220]

However, the Court did "not read [*Tenney*] as broadly" as the defendant would have preferred.[221] For one thing, whereas the issue in *Tenney* "was whether state legislators were *immune* from civil *suits* for alleged violations of civil rights," the issue in *Gillock* was whether to "recognize a legislative *privilege* barring the introduction of *evidence* of the legislative acts of a state legislator."[222] In other words, *Tenney* was a state legislative *immunity* case, while *Gillock* was a state legislative *privilege* case.[223] That distinction mattered, the *Gillock* Court reasoned, because whereas subjecting a state legislator to *suit and liability* for his legislative acts creates an obvious "potential for disruption of the state legislative process," merely admitting a state legislator's acts into *evidence* may have a comparatively "minimal impact on the exercise of his

[218] 445 U.S. at 370.

[219] *See id.* at 369, 371–73.

[220] *Id.* at 369, 371–72; *see also supra* Section II.C.1.a (discussing *Tenney* in depth).

[221] *See* 445 U.S. at 372.

[222] *Compare id.* at 371 (emphases added), *with id.* at 361–62 (emphases added).

[223] *See, e.g.*, *Loesel*, 2010 WL 456931, at *6 ("*Tenney* . . . addressed immunity from suit, not an evidentiary privilege that would prevent a state legislator from testifying at a deposition or trial.").

legislative function."[224] That is, the legislative interference concerns that justify granting state legislators absolute *immunity* aren't necessarily as weighty when the question isn't whether to let a litigant *sue* a state legislator, but instead whether to let that litigant introduce *evidence* of legislative acts.[225] Thus, absent a constitutional provision like the Speech or Debate Clause requiring courts to give state legislators immunity and privilege in roughly equal measure,[226] the *Gillock* Court declined to recognize "an evidentiary privilege for state legislators for their legislative acts" that would provide "only speculative benefit to the state legislative process."[227]

The Supreme Court also distinguished *Tenney* on the additional ground that "*Tenney* was a *civil* action brought by a *private* plaintiff to vindicate *private* rights," whereas *Gillock* was a *criminal* action brought by *the federal government*.[228] The Court reasoned that it's acceptable to prohibit private plaintiffs from bringing *civil* suits against state legislators—even state legislators who do illegal things—because "federal *criminal* liability [remains] a restraining factor on the

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[224] *Compare* 445 U.S. at 371, *with id.* at 373.

[225] *See id.* at 371–73; *see also, e.g.*, *Loesel*, 2010 WL 456931, at *6 ("Undoubtedly, interference with the legislative process is greater when a state legislator is called upon to defend him or herself against a lawsuit, than when he or she is merely called upon to testify in a civil case.").

[226] *See Gillock*, 445 U.S. at 374 (emphasizing that "[t]he Federal Speech or Debate Clause" is "by its terms . . . confined to federal legislators").

See also, e.g., *Tohono O'odham Nation v. Ducey*, No. CV-15-01135, 2016 WL 3402391, at *6 (D. Ariz. June 21, 2016) (noting that because state legislative privilege "is not a Constitutional imperative like federal legislative immunity," "courts generally have found that" the state legislative privilege "should surrender when opposed by significant countervailing interests"); *Bethune-Hill*, 114 F. Supp. 3d at 334 (explaining that because the state legislative privilege is "not founded on the United States Constitution, but rather [is] based on an interpretation of the federal common law," the state legislative privilege "is necessarily abrogated when [it] is incompatible with federal statutory law").

[227] 445 U.S. at 373.

[228] *Id.* at 372 (emphases added).

conduct of state officials."[229] Thus, the Court opined, "in protecting the independence of state legislators, *Tenney* and subsequent cases on official immunity have drawn the line at civil actions."[230]

The Court therefore held that "although principles of comity command careful consideration," "comity yields" when "important federal interests are at stake, as in the enforcement of federal criminal statutes."[231] Because adopting the defendant's proposed evidentiary privilege would "handicap[] proof of the relevant facts" in the criminal case while providing "only speculative benefit to the state legislative process," the Court "discern[ed] no basis" for recognizing the defendant's proposed "judicially created limitation" on the admissibility of evidence.[232] The Court therefore held that the state legislative privilege didn't bar prosecutors from introducing evidence of the defendant's legislative acts at his criminal trial.[233]

Gillock thereby establishes that the *state* legislative privilege isn't as broad as its *federal* counterpart;[234] nor is the state legislative *privilege* as broad as state legislative *immunity*.[235]

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[229] *Id.* (emphasis added).

[230] *Id.* at 373.

[231] *Id.*

[232] *Id.* at 373–74.

[233] *See id.* at 366–74.

[234] *See id.* at 366–67 (emphasizing that "much of the evidence" that the Supreme Court deemed non-privileged in *Gillock* "would [have been] inadmissible" if the Court had accepted the defendant's invitation to "recognize an evidentiary privilege" for state legislators "similar in scope to" federal legislative immunity under "the Federal Speech or Debate Clause").

[235] *See id.* at 371 ("Gillock relies heavily on *Tenney* . . . where this Court was cognizant of the potential for disruption of the state legislative process. The issue there, however, was whether state legislators were *immune* from civil suits . . . ." (emphasis added) (citation omitted)).

Whereas the Speech or Debate Clause flatly prohibits "inquir[ies] into . . . the motivation for" *federal* lawmakers' legislative acts,[236] and whereas *Tenney* establishes that common-law *immunity* broadly forbids courts from "inquir[ing] into the motives of [state] legislators" for the purposes of determining whether they're subject to *suit and liability*,[237] *Gillock* demonstrates that, in at least some cases, litigants may introduce *evidence* of a state legislator's motivations in a federal judicial proceeding.[238]

Still, *Gillock* doesn't answer two critical questions—at least not expressly. First, to what extent do *Gillock*'s teachings about the state legislative privilege's unavailability in federal *criminal* cases carry over to *civil* cases?[239] One might, after all, interpret *Gillock*'s statement that "*Tenney* and subsequent cases on official *immunity* have drawn the line at civil actions"[240] to imply that *Gillock* draws a similar "line at civil actions" for state legislative *privilege* purposes.[241] To that end, a few lower courts have held—or at least strongly suggested—that

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[236] *See id.* at 366–67 (quoting *Brewster*, 408 U.S. at 525); *see also supra* Section II.B.

[237] *See Tenney*, 341 U.S. at 377; *see also supra* Section II.C.1.a.

[238] *See Gillock*, 445 U.S. at 366–67 (explaining that although the Speech or Debate Clause would have categorically forbidden any "inquiry into . . . the motivation for" the defendant's legislative acts if he had been a "Member[] of Congress," there is no "comparable evidentiary privilege for state legislators in federal prosecutions" (quoting *Brewster*, 408 U.S. at 525)).

[239] *See, e.g.*, *Plain Loc. Sch. Dist. Bd. of Educ. v. DeWine*, 464 F. Supp. 3d 915, 920 (S.D. Ohio 2020) (remarking that *Gillock* "left open the question of when a State legislator can invoke the common-law evidentiary legislative privilege in a federal civil case"); *Kay*, 2003 WL 25294710, at *11 ("It is clear that the [state legislative] privilege is sharply curtailed in *criminal* cases . . . But the authorities are split over whether (a) the qualification announced in *Gillock* is limited to criminal actions, and thus that the legislative privilege is absolute in civil cases, or (b) a balancing test should always apply, so that plaintiffs alleging serious, albeit civil, wrongs, sometimes may obtain legislators' and staff members' testimony." (citations omitted)).

[240] *See* 445 U.S. at 373 (emphasis added).

[241] *See, e.g.*, *Lee v. Va. State Bd. of Elections*, No. 3:15CV357, 2015 WL 9461505, at *5 (E.D. Va. Dec. 23, 2015) [hereinafter *Va. State Bd. of Elections*] (remarking that *Gillock* "seemed to limit its holding

Gillock's limitations on the state legislative privilege are restricted to the criminal context, and have little to no bearing in civil cases.[242]

But far more courts have rejected that cramped reading of *Gillock*,[243] and rightly so. After all, if the Supreme Court thought that the state legislative privilege never yields in civil cases, it wouldn't have said just three years earlier in *Arlington Heights* that state legislators "might be called to the stand at trial to testify concerning the purpose of [an] official action" in "extraordinary" civil cases involving allegations of discriminatory intent.[244] Moreover, by stating the state legislative privilege yields "where important federal interests are at stake, *as in*

. . . to criminal matters, stating explicitly that '*Tenney* and subsequent cases on official immunity have drawn the line at civil actions'" (quoting *Gillock*, 445 U.S. at 373)).

[242] *See, e.g.*, *Pernell*, 84 F.4th at 1344 ("[T]he district court decided that the exception to the legislative privilege extends beyond the circumstances identified in *Gillock* to include the facts of this [civil] case . . . . This extension was erroneous. The Supreme Court has never expanded the *Gillock* exception beyond criminal cases. For purposes of the legislative privilege, there is a fundamental difference between civil actions by private plaintiffs and criminal prosecutions by the federal government. Although the legislative privilege does not presumptively apply in the latter type of case, the presumption otherwise holds firm. And it is insurmountable in private civil actions under section 1983." (cleaned up)); *Va. State Bd. of Elections*, 2015 WL 9461505, at *5.

[243] *See, e.g.*, *McMaster*, 584 F. Supp. 3d at 162 & n.4 ("Senate Defendants attempt to limit *Gillock* to its facts (or at best, to federal criminal prosecutions), arguing '*Gillock* was a criminal prosecution brought by the federal government, not a civil action brought by a private plaintiff.' This argument misses the forest for the trees. . . . It is not the simple distinction between 'criminal' and 'civil' cases which determines the availability of [the state legislative] evidentiary privilege, but rather, the importance of the federally created public rights at issue. And when cherished and constitutionally rooted public rights are at stake, legislative evidentiary privileges must yield. . . . Numerous circuit and district courts [have] reached a similar interpretation of *Gillock* . . . ." (cleaned up)); *Mich. State*, 2018 WL 1465767, at *4 ("The state legislators in this matter would have this court interpret [*Gillock*] to mean that state legislators enjoy an absolute evidentiary legislative privilege except when they are faced with criminal prosecution. To the contrary, the precedent suggests that state legislators enjoy only a qualified legislative privilege against having to provide records or testimony concerning their legislative activity, which can be overcome in extraordinary circumstances, *e.g.*, where important federal interests are at stake." (citations omitted)); *Kay*, 2003 WL 25294710, at *11–14 (rejecting the argument that "the qualification announced in *Gillock* is limited to criminal actions," and instead holding "that plaintiffs alleging serious, albeit civil, wrongs, sometimes may obtain legislators' and staff members' testimony").

[244] *See Arlington Heights S. Ct. Op.*, 429 U.S. at 268.

the enforcement of federal criminal statutes"[245]—as opposed to just saying that the privilege yields "*in criminal cases*"—*Gillock* implies that federal criminal prosecutions are *just one example* of a case in which the state legislative privilege yields, not the single solitary exception.

Gillock therefore suggests that when a litigant seeks discovery from a state legislator in a federal civil case, the court shouldn't prohibit that discovery outright just because the case isn't a criminal prosecution. Instead, the court must assess whether the civil case implicates "important federal interests" comparable in gravity to those at issue in federal criminal cases.[246] If so, then the state legislative privilege must yield.[247]

The other question that *Gillock* doesn't explicitly answer is whether or how *Gillock*'s pronouncements about the state legislative privilege's *evidentiary* aspect apply to the privilege's *documentary nondisclosure* and *testimonial* aspects.[248] The issue in *Gillock*, after all, was whether the Government could *introduce evidence* of the defendant's legislative activities that was *already in the Government's possession*.[249] But what if a litigant isn't merely seeking to

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[245] *See Gillock*, 445 U.S. at 373 (emphasis added).

[246] *See id.*

See also, e.g., *Comm. for a Fair & Balanced Map*, 2011 WL 4837508, at *6 (concluding that "[v]oting rights cases" are "akin to criminal prosecutions" for the purposes of *Gillock*'s "important federal interests" exception because "although brought by private parties," they "seek to vindicate public rights" (quoting *Gillock*, 445 U.S. at 373)).

[247] *See Gillock*, 445 U.S. at 373.

[248] *See supra* notes 80–85 and accompanying text (discussing the legislative privilege's three distinct components).

[249] *See Gillock*, 445 U.S. at 361–62 ("We granted certiorari to [decide] whether the federal courts . . . should recognize a legislative privilege barring the *introduction of evidence* of the legislative acts of a state legislator . . . ." (emphasis added)).

See also, e.g., *id.* at 365 (noting that the Government intended to "offer evidence that Gillock introduced reciprocity legislation in the senate and that he arranged for the introduction of a similar bill in the house"); *id.* (noting that the Government "further proposed to introduce statements made by Gillock on the floor of the senate in support of the bill"); *id.* (noting that the Government "intended to prove that

introduce evidence into the judicial record, but is instead demanding that a state legislator *locate and produce nonpublic documents*? The latter is more intrusive and distracting—and, thus, poses a greater potential threat to legislative independence.

And what if, besides demanding that a state legislator turn over *existing* evidence, a litigant also wants to compel that legislator to create *new* evidence by testifying involuntarily at a deposition or at trial? Such demands for *testimonial* evidence may divert legislators' attention from their legislative duties and intrude on legislative prerogatives even more than demands for *documentary* evidence.[250]

One must therefore interpret *Gillock*'s remark that "denial of a privilege to a state legislator" has only a "minimal impact on the exercise of his legislative function"[251] in a way that doesn't contradict *Arlington Heights*'s competing admonition that compelling a legislator to testify about her motives at trial or a deposition is "usually to be avoided" because it "represent[s] a substantial intrusion into" the legislative process.[252] At the same time, though,

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. . . Gillock moved to override the Governor's veto of the legislation, and stated that it would introduce into evidence any and all statements made by Gillock on the floor of the senate in support of his motion to override").

[250] *Cf., e.g.*, *In re B&C KB Holding GmbH*, No. 23-MC-6, 2023 WL 5974634, at *8 (W.D. Wis. Sept. 14, 2023) (remarking in a different context that "[r]equiring [a person] to sit for a deposition imposes a significantly greater burden . . . in terms of time and money than merely searching [one's] files for documents").

See also Favors v. Cuomo, No. 11-CV-5632, 2013 WL 11319831, at *15 (E.D.N.Y. Feb. 8, 2013) [hereinafter *Favors II*] ("[R]esponses to interrogatories are more akin to testimony than to disclosure of pre-existing documents. In only the rarest of circumstances will courts compel testimony from legislators asserting legislative privilege. Because interrogatories, like testimony, seek after-the-fact accounts of and explanations for the deliberative decisionmaking process, interrogatories served on legislators should, at a minimum, be subject to an even more exacting balancing test than are document demands." (citations omitted)).

[251] *See Gillock*, 445 U.S. at 373.

[252] *See Arlington Heights S. Ct. Op.*, 429 U.S. at 268 n.18 (quoting *Volpe*, 401 U.S. at 420).

one must also give effect to *Arlington Heights*'s equally important caveat that even though compulsory legislative testimony is "*usually* to be avoided," state legislators might nonetheless "be called to the stand at trial to testify concerning the purpose of [an] official action" in "*extraordinary* instances."[253]

The most faithful way to give full effect to *Gillock* and *Arlington Heights* alike is to conceive of state legislative privilege as a sliding scale, such that the level of protection varies based on:

(1) the extent to which any particular demand for nonpublic legislative evidence—be it documentary or testimonial—would disrupt the legislative process and threaten legislative independence, counterbalanced against

(2) the importance of the interests that the litigant seeks to vindicate.[254]

So, on one end of the spectrum, the state legislative privilege will seldom preclude litigants from merely *introducing evidence* of legislative activities into a judicial record, because *Gillock* explicitly states that introducing such evidence has a comparatively "minimal impact on the exercise of [the] legislative function."[255] Interpreting *Gillock* that way also honors *Trammel*'s admonition that common-law privileges "contravene the fundamental principle that the public has a right to every man's evidence," and therefore must "be strictly construed and accepted only to [a] very limited extent."[256]

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[253] *See id.* at 268 & n.18 (emphases added).

[254] *See, e.g.*, *Hobart v. City of Stafford*, 784 F. Supp. 2d 732, 764 (S.D. Tex. Apr. 29, 2011) ("The Court finds it appropriate, to determine whether any evidentiary privilege applies in a particular civil context, to apply the balance of interests articulated in *Gillock*. Accordingly, the Court will weigh the federal interests at stake against the potential harm to the state legislative process.").

[255] *See* 445 U.S. at 373.

[256] *See Trammel*, 445 U.S. at 50 (cleaned up) (first quoting *Bryan*, 339 U.S. at 331; then quoting *Elkins*, 364 U.S. at 234 (Frankfurter, J., dissenting)); *see also supra* Section II.C.2.a.ii (analyzing *Trammel* in depth).

On the opposite end of the spectrum, litigants who seek to compel state legislators to *testify at trial or a deposition* "frequently will be barred by privilege," as *Arlington Heights* teaches that direct "inquiries into legislative . . . motivation represent a substantial intrusion into" the state legislative process that should "usually . . . be avoided."[257] But that doesn't mean that legislative testimony is completely off limits. Read together, *Arlington Heights* and *Gillock* establish that in "extraordinary instances"[258]—*i.e.*, not just in criminal cases, but also in civil cases "where important federal interests are at stake"—the state legislative privilege "yields" to demands for legislative testimony.[259]

Between those poles are motions to compel legislators to produce nonpublic *documents*. At least in some cases, overriding federal interests may justify such intrusions into the legislative domain.[260]

Furthermore, because requiring legislators to produce *documents* is less intrusive than forcing legislators to sit for *depositions* or testify at *trial*,[261] there may be cases where balancing the competing interests at stake leads a court to forbid *testimonial* discovery but permit

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[257] *See* 429 U.S. at 268 & n.18 (quoting *Volpe*, 401 U.S. at 420).

[258] *See id.* at 268.

[259] *See Gillock*, 445 U.S. at 373.

[260] *See, e.g.*, *Favors II*, 2013 WL 11319831, at *12 (concluding, after applying "a balancing approach" of the sort advocated here, that certain documents could "not be withheld on the basis of the legislative privilege").

[261] *See, e.g.*, *Bethune-Hill*, 114 F. Supp. 3d at 342 ("[A] request for documents is less burdensome than a request for testimony."); *McMaster*, 584 F. Supp. 3d at 165 (similar).

But see ACORN v. County of Nassau, No. 05-CV-2301, 2009 WL 2923435, at *4 n.3 (E.D.N.Y. Sept. 10, 2009) (reaching the opposite conclusion that there's "no reason why documents evincing legislative intent should be more discoverable than deposition testimony reflecting the same, as both implicate the same interests").

documentary discovery.[262] After all, once a court has ordered a legislature to turn over documents evidencing its internal activities, deposing individual legislators about those very same activities might be duplicative—and, thus, not warrant the comparatively greater intrusion.[263] Where, by contrast, no contemporaneous documentation of a particular legislative act exists, deposing the legislators might be both necessary and appropriate.[264]

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[262] *See, e.g.*, *Doe v. Nebraska*, 788 F. Supp. 2d 975, 984 (D. Neb.) [hereinafter *Nebraska*] (emphasizing that even in cases in which state legislators are "protected from testifying," they "are not necessarily exempted from producing documents"), *objections denied*, 2011 WL 2413359 (D. Neb. June 15, 2011).

[263] *See, e.g.*, *City of Greensboro v. Guilford Cnty. Bd. of Elections*, No. 1:15cv559, 2016 WL 11660626, at *7 (M.D.N.C. Dec. 20, 2016) ("[T]he Court declines to order Senator Wade to be deposed. . . . [T]he cost and inconvenience of deposition testimony and distractions of a trial would be far more burdensome than any benefit from such testimony, particularly in light of the documents that Legislative Respondents are ordered to produce. . . . The Court finds that prohibiting deposition testimony but requiring Legislative Respondents to produce certain documents strikes the appropriate balance between protecting the legislative process and the need to ensure that Individual Plaintiffs' constitutional rights are not violated." (cleaned up)).

Cf. Favors I, 2013 WL 11319831, at *15 (concluding that the plaintiffs' need to propound interrogatories "question[ing] individual legislators . . . about their motives"—which were "more akin to testimony than to disclosure of pre-existing documents" and therefore were "subject to an even more exacting balancing test than are document demands"—was "reduced in light of the Court's rulings allowing disclosure of certain categories of pre-existing documents relevant to the plaintiffs' claims").

[264] *See, e.g.*, *Nashville Student Org. Comm.*, 123 F. Supp. 3d at 971 ("Here, several legislators claim to have no private records concerning the challenged Voter ID provision, and the [state legislature] routinely deletes its members' electronically stored information. Particularly given the dearth of available documentary evidence outside of the legislative history, additional relevant information may come from the legislators themselves.").

To sum up, *Gillock* stands for the following propositions that should guide our analysis here. First, ***the common-law-based state legislative privilege is significantly narrower than the constitutionally-based federal legislative privilege***.[265] That must be so, or else the Supreme Court wouldn't have emphasized that the evidence that the Government sought to introduce in *Gillock* would have been inadmissible if the federal legislative privilege applied instead of its state analogue.[266]

Second, the *reason* why the state legislative privilege is narrower than its federal counterpart is because ***the policy rationales that undergird the federal legislative privilege don't apply to state legislators to the same extent***.[267] *Gillock* explicitly holds that the separation-of-powers rationale doesn't apply to state legislators at all.[268] And the other rationale—the need to

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[265] *See Gillock*, 445 U.S. at 369–73.

See also, e.g., *Harding v. County of Dallas*, No. 3:15-CV-0131, 2016 WL 7426127, at *2 (N.D. Tex. Dec. 23, 2016) ("[T]he Supreme Court ruled in *Gillock* that, in contrast to the privilege enjoyed by federal legislators, there is no absolute 'evidentiary privilege for state legislators for their legislative acts.'" (quoting *Gillock*, 445 U.S. at 373)); *Alviti*, 14 F.4th at 87 ("Assertions of legislative . . . privilege by state lawmakers stand on different footing [than privilege assertions by federal lawmakers]. For starters, they are governed by federal common law rather than the Speech or Debate Clause, which by its terms applies only to federal legislators. And the common-law legislative . . . privilege [is] less protective than [its] constitutional counterpart[]." (citations omitted)).

[266] *See Gillock*, 445 U.S. at 366–67 (1980); *see also supra* notes 208–212 and accompanying text.

[267] *See Gillock*, 445 U.S. at 369–73.

[268] *See id.* at 370–71.

See also, e.g., *Supreme Court of Virginia*, 446 U.S. at 733 ("[T]he separation-of-powers doctrine justifies a broader privilege for Congressmen than for state legislators in criminal actions." (citing *Gillock*, 445 U.S. at 370)); *Alviti*, 14 F.4th at 87 (emphasizing that "the common-law legislative . . . privilege" that state lawmakers enjoy is "less protective" than the federal legislative privilege "because the separation-of-powers rationale underpinning the Speech or Debate Clause does not apply when it is a state lawmaker claiming legislative . . . privilege" (citing *Gillock*, 445 U.S. at 366–67, 370, 372–73)); *Fla. Ass'n*, 164 F.R.D. at 267 ("[T]he separation of powers interest at stake with respect to the federal Speech or Debate Clause is not at issue in this case [involving state legislative staff]. That is

avoid "disruption of the state legislative process"—doesn't by itself justify an absolute (rather than qualified) privilege for state legislators.[269]

It follows from those propositions that ***judges should be wary about relying on federal legislative privilege cases when determining whether the state legislative privilege applies*** because the two doctrines have different policy justifications—and, thus, different scopes.[270]

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purely an issue of the relationship of the federal judiciary to Congress, and does not arise here. *Gillock* . . . h[as] made it clear that the Supremacy Clause overrides any notion that this interest applies.").

See also supra notes 216–218 and accompanying text.

[269] *See Gillock*, 445 U.S. at 371; *see also id.* at 373 ("[A]lthough principles of comity command careful consideration, our cases disclose that where important federal interests are at stake, . . . comity yields.").

See also, e.g., *Bethune-Hill*, 114 F. Supp. 3d at 335 (explaining that "[t]he authorities do not establish" that a state legislator's "interest in being free from the distraction of compulsory process" is by itself "sufficient to justify an *absolute* legislative privilege in instances where a state legislator is not personally threatened with liability and an exercise of the privilege would frustrate the execution of federal laws protecting vital public rights;" "[i]n such situations, a privilege will still apply, but it will be qualified and subject to balancing in the face of great evidentiary need" (citations omitted)).

[270] *See, e.g.*, *Nebraska*, 788 F. Supp. 2d at 985–86 (concluding that case law "involv[ing] subpoenas to *federal* lawmakers" was "not applicable" in case "involving a *state* governmental body" (emphases added)); *Fla. Ass'n*, 164 F.R.D. at 266 ("[T]he Speech or Debate Clause does not apply at all to state and local legislators. Thus, this court should follow the path which was blazed in *Gillock* to determine whether a federal common law privilege for state legislators exists, rather than look to precedent founded entirely upon the full scope of the Speech or Debate Clause."); *Jackson Mun. Airport Auth. v. Bryant*, No. 3:16-cv-246, 2017 WL 6520967, at *5, *7–8 (S.D. Miss. Dec. 19, 2017) (emphasizing that "jurisprudence on the Speech and [sic] Debate Clause, *i.e.*, cases involving members of Congress, is distinct from federal common law relating to the limited legislative privilege afforded state legislators"), *aff'd in part, rev'd in part, and remanded sub nom.*, *Jackson Mun. Airport Auth. v. Harkins*, 67 F.4th 678 (5th Cir.), *withdrawn and superseded by* No. 21-60312, 2023 WL 5522213 (5th Cir.), *vacated, reh'g en banc granted*, 78 F.4th 844 (5th Cir. 2023), *appeal dismissed as moot*, --- F.4th ----, 2024 WL 1394246 (5th Cir. Apr. 2, 2024) (en banc).

Gillock's third major takeaway is that ***the policy reason for giving state legislators expansive immunity***—namely, to preserve legislative independence by shielding state lawmakers from distractions that could divert them from their important legislative duties—***doesn't justify giving state legislators a privilege of equal breadth***.[271] That's because requiring a state legislator to *defend himself from a civil lawsuit* based on his legislative activities would create an obvious "potential for disruption of the state legislative process,"[272] but forcing a *nonparty* state legislator to merely comply with *discovery demands* doesn't necessarily pose the same risk.[273]

Thus, just as *Gillock* counsels against uncritically citing *federal* legislative privilege cases for propositions regarding the *state* legislative privilege's scope, ***judges should be equally wary about citing state legislative immunity cases (like* Tenney *and* Bogan*) for propositions about the state legislative privilege***.[274] After all, if the Supreme Court's state legislative immunity precedents were seamlessly transferrable to the legislative privilege context, *Gillock* wouldn't have taken pains to distinguish itself from *Tenney* on the ground that *Tenney* was an immunity case.[275] Thus, even though *Tenney* broadly prohibits courts from examining state legislators'

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[271] *See Gillock*, 445 U.S. at 371–73.

[272] *See id.* at 371–72 (citing *Tenney*, 341 U.S. at 372, 376).

[273] *See id.* at 373 (opining "that denial of a privilege to a state legislator may have" only a "minimal impact on the exercise of his legislative function").

[274] *See id.* at 372 ("Although *Tenney* reflects this Court's sensitivity to interference with the functioning of state legislators, we do not read that opinion as broadly as Gillock would have us.").

See also, e.g., *Mich. State*, 2018 WL 1465767, at *5 ("[T]he state legislators in this case would have the court disregard the decisions of its sister courts in favor of the Supreme Court's decisions in *Tenney* and *Gillock*. But *Tenney* dealt primarily with legislative immunity from suit, not a legislative evidentiary privilege. And as discussed above, *Gillock* is suggestive of a qualified legislative privilege that can be overcome where important federal interests are at stake." (citations omitted)).

[275] *See Gillock*, 445 U.S. at 371–73 ("Gillock relies heavily on *Tenney* . . . where this Court was cognizant of the potential for disruption of the state legislative process. The issue there, however, was

motivations for the purposes of determining whether those legislators are immune from *suit, damages, or injunctive relief*,[276] it doesn't follow that litigants may never obtain *evidence* of a state legislature's motivations in cases where the plaintiff isn't seeking legal or equitable relief against individual state legislator defendants.[277]

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whether state legislators were *immune* from civil suits for alleged violations of civil rights . . . ." (emphasis added)).

[276] *See Tenney*, 341 U.S. at 377 (opining that "[t]he claim of an unworthy purpose does not destroy" state legislative immunity, as immunity "would be of little value if [state legislators] could be subjected to the cost and inconvenience and distractions of a *trial* upon a conclusion of the pleader, or to the hazard of a *judgment* against them based upon a jury's speculation as to motives" (emphases added)); *see also supra* Section II.C.1.a.

[277] *See, e.g.*, *Page*, 15 F. Supp. 3d at 665 ("[State legislative] immunity . . . does not . . . necessarily prohibit judicial inquiry into legislative motive where the challenged legislative action is alleged to have violated an overriding, free-standing public policy. . . . Here, there is an overriding, free-standing public policy reflected in the Equal Protection Clause of the federal Constitution and the [VRA]. Both parties have placed squarely into issue the legislative motive in enacting the redistricting legislation. . . . [I]t is, therefore, appropriate to permit the discovery of documents . . . ." (cleaned up) (quoting *Marylanders*, 144 F.R.D. at 304 (opinion of Murnaghan, J. & Motz, J.))); *Rodriguez*, 280 F. Supp. 2d at 100 (explaining that a state legislator may sometimes "be required to disgorge documents or provide other information" even if that legislator is immune from suit and liability).

There's admittedly a counterargument to the conclusion that judges should avoid relying on state legislative immunity cases like *Tenney* in the state legislative privilege context: The Supreme Court itself cited *Tenney* when discussing the state legislative privilege in *Arlington Heights*. *See Arlington Heights S. Ct. Op.*, 429 U.S. at 268 ("In some extraordinary instances the members might be called to the stand at trial to testify concerning the purpose of the official action, although even then such testimony frequently will be barred by *privilege*." (emphasis added) (citing *Tenney*, 341 U.S. at 376)).

At least one lower court has inferred from *Arlington Heights*'s citation to *Tenney* that courts may import *Tenney*'s holdings regarding the impropriety of scrutinizing legislative motives for legislative *immunity* purposes into the legislative *privilege* context. *See Common Cause Fla. v. Byrd*, 674 F. Supp. 3d 1097, 1103 n.2 (N.D. Fla. 2023) ("*Tenney* held that defendant legislators were *immune* from civil liability for their legislative acts, and Plaintiffs thus question *Tenney*'s usefulness [in this legislative *privilege* case]. But . . . the Supreme Court itself . . . recognized [in *Arlington Heights*] that *Tenney* is instructive on a legislator's evidentiary privilege." (emphasis added) (cleaned up)); *see also id.* at 1103 (citing *Tenney* for the proposition that the state legislative privilege bars "requests for information about the motives for legislative votes and legislative enactments . . . even when . . . there are allegations of improper or unlawful motives" (cleaned up)).

Still, it's a mistake to interpret *Arlington Heights*'s citation to *Tenney* to mean that *Tenney*'s categorical prohibition against scrutinizing legislative motives in the *immunity* context applies equally to the *privilege* context. If it did, the *Arlington Heights* Court wouldn't have said in the exact same sentence that, notwithstanding the legislative privilege, there remain "extraordinary instances" in which state

Gillock's final (and most important) takeaway is that ***the state legislative privilege "yields" not just in criminal cases, but also in civil cases "where important federal interests are at stake."***[278] So, when a litigant demands evidence from a state legislator in a civil case, a court mustn't quash that demand summarily just because the suit isn't a criminal prosecution.[279]

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legislators "might be called to the stand at trial to testify concerning the purpose of [an] official action." *See Arlington Heights S. Ct. Op.*, 429 U.S. at 268 (citing *Tenney*, 341 U.S. 367).

In any event, the *Gillock* Court confirmed just three years after *Arlington Heights* that *Tenney*'s teachings don't automatically carry over to the legislative privilege context. *See Gillock*, 445 U.S. at 371–72, 374 ("[The defendant] relies heavily on *Tenney* . . . where this Court was cognizant of the potential for disruption of the state legislative process. The issue there, however, was whether state legislators were *immune* from civil suits . . . . Although *Tenney* reflects this Court's sensitivity to interference with the functioning of state legislators, we do not read that opinion as broadly as Gillock would have us. . . . [W]e discern no basis in these circumstances for a judicially created limitation [on the admissibility of evidence] that handicaps proof of the relevant facts." (emphasis added)).

Thus, *Arlington Heights*'s citation to *Tenney* doesn't imply that courts may take *Tenney*'s teachings regarding state legislative immunity and transplant them uncritically into the state legislative privilege context. *See, e.g.*, *Loesel*, 2010 WL 456931, at *6 ("While Defendant places significant emphasis on the Court's holding in *Tenney*, the Court there addressed immunity from suit, not an evidentiary privilege that would prevent a state legislator from testifying at a deposition or trial. . . . Given the *Gillock* Court's tolerance of the fact that 'the lack of an evidentiary privilege for a state legislator might conceivably influence his conduct while in the legislature,' Defendant has not explained why this Court should extend the immunity from suit to an evidentiary privilege." (quoting *Gillock*, 445 U.S. at 371)).

[278] *See Gillock*, 445 U.S. at 373.

See also, e.g., *McMaster*, 584 F. Supp. 3d at 162 ("The thrust of *Gillock* is that official privilege is not without limit. When in conflict, the weighty federal interests embedded in the Constitution and laws of this nation require these privileges to yield. . . . It is not the simple distinction between 'criminal' and 'civil' cases which determines the availability of this evidentiary privilege, but rather, the importance of the federally created public rights at issue. And when cherished and constitutionally rooted public rights are at stake, legislative evidentiary privileges must yield.").

[279] *See, e.g.*, *Page*, 15 F. Supp. 3d at 665 ("[T]he argument that legislative privilege is an impenetrable shield that completely insulates any disclosure of documents is not tenable." (cleaned up)).

Instead, the court must weigh the risk of legislative interference and intrusion that the discovery request poses against the importance of the issues at stake.[280]

b. District Court Cases

At least until recently,[281] that's exactly how most lower courts interpreted *Arlington Heights*, *Trammel*, and *Gillock*. That is, most lower courts understood the Supreme Court's legislative privilege precedents to hold

(1) that the *state* legislative *privilege* is narrower than both the *federal* legislative privilege and state legislative *immunity*;

(2) that the state legislative privilege is subject to a balancing test that weighs the risk of legislative interference against the federal interests at stake; and

(3) that, as a consequence, the privilege doesn't categorically bar litigants from obtaining documentary and testimonial discovery from state legislatures in important civil cases[282]—a category that includes redistricting cases.[283]

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[280] *See Gillock*, 445 U.S. at 373.

See also, e.g., *Benisek*, 241 F. Supp. 3d at 574 (noting that *Gillock* "clearly repudiat[es]" any notion that the state legislative privilege is "absolute," and confirming that courts considering "whether legislative privilege protects a state legislative actor from discovery" must "balance the significance of the federal interests at stake against the intrusion of the discovery sought and its possible chilling effect on legislative action"); *Favors I*, 285 F.R.D. at 209 ("To determine whether the [state] legislative privilege precludes disclosure, a court must balance the interests of the party seeking the evidence against the interests of the individual claiming the privilege.").

[281] *But see infra* Section II.C.2.c.

[282] *See, e.g.*, *Favors I*, 285 F.R.D. at 214 (noting "the clear weight of authority holding that the [state] legislative privilege is qualified and subject to a judicial balancing test"); *NAACP v. E. Ramapo Cent. Sch. Dist.*, No. 17 Civ. 8943, 2018 WL 11260468, at *4 (S.D.N.Y. Apr. 27, 2018) ("Unlike legislative immunity, . . . the legislative privilege is not absolute. 'Thus, courts have indicated that, notwithstanding their immunity from suit, legislators may, at times, be called upon to produce documents or testify at depositions.'" (citations omitted) (quoting *Rodriguez*, 280 F. Supp. 2d at 95)).

[283] *See, e.g.*, *Pulte Home Corp. v. Montgomery County*, No. 14-3955, 2017 WL 2361167, at *3 n.6 (D. Md. May 31, 2017) ("Numerous courts have held that the legislative privilege must yield to discovery in redistricting litigation.").

See also infra note 296 (listing numerous redistricting cases in which courts have let plaintiffs obtain at least some discovery from legislative entities).

i. *Rodriguez*

Take, for instance, the Southern District of New York's 2003 opinion in *Rodriguez v. Pataki*.[284] The plaintiffs there—like the Plaintiffs here—challenged a redistricting plan as intentionally discriminatory.[285] In an attempt to obtain evidence to prove their claim, the plaintiffs moved to compel the state legislature to produce "all documents relating to the analysis and process employed by the defendants in developing the [challenged] redistricting plans" and answer interrogatories concerning those same topics.[286] The legislators tried to resist that discovery on legislative privilege grounds.[287]

The court first emphasized that although state legislative *immunity* and state legislative *privilege* are "closely related" and "often discussed interchangeably," "there is one key difference": unlike state legislative immunity, state "[l]egislative privilege . . . is not absolute."[288] To the contrary, held the *Rodriguez* court, the state legislative privilege "is, at best, one which is qualified."[289] Citing the aforementioned passage from *Arlington Heights* indicating that, in "extraordinary instances," legislators "might be called to the stand at trial to testify concerning the purpose of [an] official action," the *Rodriguez* court concluded that state legislators "may, at

[284] 280 F. Supp. 2d 89.

[285] *Id.* at 91, 93.

[286] *Id.* at 92.

[287] *Id.*

[288] *Id.* at 95.

[289] *Id.* at 100 (citing *Grand Jury*, 821 F.2d at 957).

times, be called upon to produce documents or testify at depositions" "notwithstanding their immunity from suit."[290]

The court then explained that, to determine "whether and to what extent the privilege should be honored" in any particular case, courts "must balance the extent to which production of the information sought would chill the [state legislature's] deliberations concerning such important matters as redistricting against any other factors favoring disclosure."[291] The court therefore devised a multifactor analytical framework for weighing those competing interests.[292] The court articulated five factors relevant to that inquiry:

(1) "the relevance of the evidence sought to be protected;"

(2) "the availability of other evidence;"

(3) "the 'seriousness' of the litigation and the issues involved;"

(4) "the role of the government in the litigation;" and

(5) "the possibility of future timidity by government employees who will be forced to recognize that their secrets are violable."[293]

[290] *Id.* at 95 (quoting *Arlington Heights S. Ct. Op.*, 429 U.S. at 268); *see also id.* at 100 (citing the same passage from *Arlington Heights* to support the proposition that "even if the legislator[s] had asserted legislative immunity as a defense, and the Court had concluded that they were protected by its mantle," they still might "be required to disgorge documents or provide other information").

[291] *Id.* at 100.

[292] *See id.* at 101.

[293] *Id.* (quoting *In re Franklin Nat'l Bank Sec. Litig.*, 478 F. Supp. 577, 583 (E.D.N.Y. 1979)).

ii. District Court Cases Adopting *Rodriguez*'s Five-Factor Balancing Test

The overwhelming majority of district courts subsequently adopted *Rodriguez*'s five-factor balancing test for evaluating state legislative privilege claims in redistricting[294] and non-redistricting cases alike.[295]

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[294] *See, e.g.*, *Bethune-Hill*, 114 F. Supp. 3d at 337 (observing that "[m]ost courts that have conducted [a state legislative] privilege analysis in the redistricting context have employed [*Rodriguez*'s] five-factor balancing test"); *Benisek*, 241 F. Supp. 3d at 575–77 ("[C]ourts ruling on claims of legislative privilege in redistricting cases have frequently adopted a five-factor standard that facilitates case-by-case evaluation of the competing interests at stake."); *Whitford*, 331 F.R.D. at 379 ("The other courts that have applied a qualified privilege to gerrymandering claims have balanced five factors . . . . We will take this approach . . . .").

[295] *See, e.g.*, *Angelicare*, 2018 WL 1172947, at *8; *McDonough*, 2015 WL 12683663, at *2, *6 (D. Me. Dec. 31, 2015); *Nashville Student Org. Comm.*, 123 F. Supp. 3d at 970; *McCrory*, 2015 WL 12683665, at *4; *BBC Baymeadows, LLC v. City of Ridgeland*, No. 3:14CV676, 2015 WL 5943250, at *5 (S.D. Miss. Oct. 13, 2015); *Veasey Dist. Ct. Op.*, 2014 WL 1340077, at *2.

But see infra Section II.C.2.b.iv (noting that a minority of district courts have rejected *Rodriguez*'s balancing approach, but explaining why those decisions are unpersuasive).

A few courts in other Circuits have adopted a variant of the *Rodriguez* framework that replaces the fifth factor with a slightly different one: "the purpose of the privilege (*i.e.*, the extent to which the discovery would impede legislative action regarding communications between and among legislators)." *See, e.g.*, *Canaan Christian Church v. Montgomery County*, 335 F. Supp. 3d 758, 767 (D. Md. 2018) (noting that split of authority and adopting the latter formulation); *Bethune-Hill*, 114 F. Supp. 3d at 338–39, 341–42 (adopting the alternate formulation of the fifth factor because (at least in the *Bethune-Hill* court's view) it better shields legislatures from "the distraction of compulsory process").

District Courts in the Fifth Circuit generally haven't adopted that alternative formulation, however. *See, e.g.*, *Veasey Dist. Ct. Op.*, 2014 WL 1340077, at *2; *Perez*, 2014 WL 106927, at *2.

Nor did this panel adopt that alternative formulation the last time it considered legislative privilege issues in this case. *See League of United Latin Am. Citizens v. Abbott*, No. 3:21-CV-00259, 2022 WL 2921793, at *4 (W.D. Tex. July 25, 2022) [hereinafter *LULAC Doc. Subpoena Op.*] (this panel's prior legislative privilege opinion), *vacated and remanded*, No. 22-50662, 2023 WL 4697109 (5th Cir. July 18, 2023) [hereinafter *LULAC Remand Order*]; *see also* Section II.C.2.e.iii (discussing our prior legislative privilege opinion in depth).

Still other courts conceive of the state legislative privilege as a subspecies of the *deliberative process* privilege, rather than as a freestanding privilege in its own right. *See Grand Jury*, 821 F.2d at 958 (pre-*Rodriguez* Circuit-level case "refus[ing] to recognize" even "a qualified privilege" for state legislators, but leaving open "the possibility [that] a more narrowly tailored privilege for confidential deliberative communications" might exist); *Irvin*, 127 F.R.D. at 170–74 (pre-*Rodriguez* redistricting case concluding that "there exists a federal common law privilege protecting the deliberative processes of local legislators" and adopting an eight-factor standard that overlaps only partially with *Rodriguez*'s five-factor

Moreover, most courts applying the *Rodriguez* factors in redistricting cases have given plaintiffs at least *some* access to internal legislative materials or legislative testimony bearing on the state legislature's intent.[296] These Courts have generally concluded that even though "judicial inquiries into legislative . . . motivation" are "*usually* to be avoided" under *Arlington Heights*,[297] redistricting challenges fall within the "extraordinary instances"/"important federal interests" exception to the state legislative privilege that *Arlington Heights* and *Gillock* explicitly

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test); *Fla. Ass'n*, 164 F.R.D. at 267–28 ("[I]f any privilege should be recognized in this case [involving attempts to depose state legislative staff], it should be a 'deliberative process privilege' . . . . [T]hese deponents do not have a privilege or immunity from attendance at a deposition."). *But see Bethune-Hill*, 114 F. Supp. 3d at 336 (opining that "[a]lthough some courts analyze the propriety of disclosure or testimony under the deliberative process privilege rather than the legislative privilege, the privilege accorded to legislators is qualified all the same based on the important federal interests at play and the quintessentially public nature of the right").

[296] *See, e.g.*, *Benisek*, 241 F. Supp. 3d at 575–77 (concluding after applying the *Rodriguez* factors "that [the state] legislative privilege d[id] not protect conversations and other communications between and among legislators"); *McMaster*, 584 F. Supp. 3d at 161, 163–66 ("Because each [*Rodriguez*] factor weighs in favor of at least some degree of disclosure [here], the court rejects Defendants' broad conception of the legislative privilege, and orders Defendants to produce requested documents, communications, and information which are relevant to the broad issue of legislative motivation in the enactment of [the challenged redistricting plan]."); *League of Women Voters of Mich.*, 2018 WL 2335805, at *5 ("This Court finds that application of the five factors developed in *Rodriguez* suggest that Plaintiffs' need for the documents and communications requested in the subpoenas is sufficient to overcome the legislative privilege."); *Harris*, 993 F. Supp. 2d at 1068–71 (concluding after analyzing the *Rodriguez* factors that the state legislative privilege didn't forbid the plaintiffs from deposing and obtaining documents from members of an independent redistricting commission); *Whitford*, 331 F.R.D. at 377–82 (applying the *Rodriguez* factors and concluding that the plaintiffs were "entitled to depose [the Wisconsin State Assembly Speaker] and to receive responses to some but not all of their requests for production").

But see, e.g., *Comm. for a Fair & Balanced Map*, 2011 WL 4837508, at *9–10 (concluding that although the state legislative privilege "does *not* protect *facts or information* available to lawmakers at the time of their decision[s]" on redistricting issues, it *does* "shield[] from disclosure pre-decisional, non-factual communications that contain *opinions, recommendations or advice* about public policies or possible legislation," including "information concerning the *motives, objectives*, plans, reports and/or procedures used by lawmakers to draw the [challenged] map" (emphases added)); *Hall v. Louisiana*, No. 12-657, 2014 WL 1652791, at *10–11 (M.D. La. Apr. 23, 2014) (reaching similar conclusion).

[297] *See Arlington Heights S. Ct. Op.*, 429 U.S. at 268 n.18 (emphasis added) (quoting *Volpe*, 401 U.S. at 420).

contemplate.[298] "[R]edistricting cases and voting rights cases are 'extraordinary,'" these courts have reasoned, partly because they involve allegations of legislative "self-dealing that deprives, or threatens to deprive, the electorate of the power of their vote to act as a check on legislators,"[299] and partly "because judicial inquiry into legislative intent is specifically contemplated as part of the resolution of the core issue that such cases present."[300]

Courts applying the *Rodriguez* framework the redistricting context have generally proceeded as follows. Beginning with *Rodriguez*'s first factor ("the relevance of the evidence sought to be protected"),[301] courts have usually concluded that when a plaintiff challenges a redistricting plan as intentionally discriminatory, nonpublic evidence bearing on the state legislature's motivations is more than just *relevant*—it's potentially the most critical evidence in the entire case.[302] Courts have therefore opined that "[r]edistricting litigation presents a

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[298] *See, e.g.*, *Harris*, 993 F. Supp. 2d at 1070 ("[T]he Supreme Court . . . held [in *Gillock*] that comity can be trumped by 'important federal interests.' The federal government has a strong interest in securing the equal protection of voting rights guaranteed by the Constitution, an interest that can require the comity interests underlying legislative privilege to yield." (quoting *Gillock*, 445 U.S. at 373)); *Whitford*, 331 F.R.D. at 377 ("We acknowledge that a sitting legislator is not subject to civil process in any but the most exceptional circumstances. But this is an exceptional case that raises important federal questions about the constitutionality of Wisconsin's plan for electing members of the [state legislature]. . . . Under these circumstances, the qualified legislative privilege to which [the Wisconsin State Assembly Speaker] is entitled must yield to the important federal interests implicated by plaintiffs' claims.").

[299] *Citizens Union*, 269 F. Supp. 3d at 168.

See also, e.g., *Bethune-Hill*, 114 F. Supp. 3d at 337 (opining that redistricting cases present exactly the sort of "extraordinary instance" that *Arlington Heights* contemplates because "the natural corrective mechanisms built into our republican system of government offer little check upon the very real threat of 'legislative self-entrenchment'" (quoting Christopher Asta, Note, *Developing a Speech or Debate Clause Framework for Redistricting Litigation*, 89 N.Y.U. L. REV. 238, 264 (2014))).

[300] *E.g.*, *Bethune-Hill*, 114 F. Supp. 3d at 337.

[301] *See Rodriguez*, 280 F. Supp. 2d at 101 (quoting *Franklin*, 478 F. Supp. at 583).

[302] *See, e.g.*, *Bethune-Hill*, 114 F. Supp. 3d at 339–40 ("Unlike other cases, where the . . . legislative privilege may be employed to prevent the government's decision-making process from being swept up unnecessarily into the public domain, this is a case where the decisionmaking process *is*

particularly appropriate circumstance for qualifying the state legislative privilege because judicial inquiry into legislative intent is specifically contemplated as part of the resolution of the core issue that such cases present."[303]

Courts have likewise generally concluded that *Rodriguez*'s second factor ("the availability of other evidence") favors disclosure in redistricting cases too.[304] Although these courts have acknowledged that plaintiffs can base intentional racial discrimination claims on

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the case. . . . Given the centrality of the legislative purpose inquiry to Plaintiff's claim . . . the evidence sought is clearly relevant, and thus [the first *Rodriguez*] factor weighs in favor of disclosure." (cleaned up) (emphasis added)); *McMaster*, 584 F. Supp. 3d at 163 ("The evidence sought by Plaintiffs is highly relevant to the intentional discrimination claims at the heart of the complaint, because the Legislature's decision making process itself *is* the case. It is undisputed that Equal Protection cases require proof of discriminatory intent, and documents containing the opinions and subjective beliefs of legislators or their key advisors are relevant to the broader inquiry into legislative intent and the possibility of racially motivated decisions that were not adequately tailored to a compelling government interest." (cleaned up) (emphasis added)); *Benisek*, 241 F. Supp. 3d at 575 ("[T]he plaintiffs must prove that in redrawing a district's boundaries, the legislature and its mapmakers were motivated by *a specific intent* to burden the supporters of a particular political party. Thus, in seeking to depose the witnesses who were involved in drawing the map, the plaintiffs are clearly seeking evidence necessary to prove this specific intent." (cleaned up)); *Harris*, 993 F. Supp. 2d at 1070 ("Because what motivated the Commission to deviate from equal district populations is at the heart of this litigation, evidence bearing on what justifies these deviations is highly relevant.").

But see, e.g., *Comm. for a Fair & Balanced Map*, 2011 WL 4837508, at *2–4, 8 (concluding that although information concerning the mapdrawers' "motives [and] objectives" was "relevant," it was "not central to the outcome of th[e] case" because "plaintiffs need not offer direct evidence of discriminatory intent" to prevail in a redistricting case); *Hall*, 2014 WL 1652791, at *9 (reaching similar conclusion).

But see supra Section I (explaining that although it's possible for plaintiffs to prove intentional discrimination by circumstantial evidence alone, relegating a plaintiff to circumstantial evidence makes it significantly harder to successfully prove intentional discrimination).

[303] *See, e.g.*, *Bethune-Hill*, 114 F. Supp. 3d at 337; *City of Greensboro*, 2016 WL 11660626, at *4.

[304] *See, e.g.*, *Bethune-Hill*, 114 F. Supp. 3d at 340–41; *League of Women Voters of Mich.*, 2018 WL 2335805, at *5; *Rodriguez*, 280 F. Supp. 2d at 102.

But see, e.g., *Hall*, 2014 WL 1652791, at *8 (concluding that the second *Rodriguez* factor "weigh[ed] against disclosure" because the plaintiffs already had access to various "matters of public record"); *Contreras v. Ill. State Bd. of Elections*, No. 21-CV-3139, 2021 WL 7709552, at *5 (N.D. Ill. Oct. 14, 2021) (concluding "that the second balancing factor . . . weigh[ed] against disclos[ing]" auto-saved, incomplete, interim drafts of redistricting maps because the plaintiffs "already ha[d] access to a great deal of [other] evidence regarding the drafting process").

circumstantial evidence collected from *public* sources (as opposed to internal legislative documents and compelled legislative testimony),[305] most courts have nonetheless concluded that there's no "substitute for the ability to depose a witness and obtain *direct* evidence of motive and intent."[306] These courts have reasoned that in the redistricting context, "no other evidence [may] be as probative of an unlawful legislative motive" as "documents, information, and communications between legislators and their staff regarding the circumstances surrounding the

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[305] *See, e.g.*, *Bethune-Hill*, 114 F. Supp. 3d at 340–41 ("Direct evidence of discriminatory intent is not necessary to prevail. Courts may infer discriminatory intent from a variety of circumstantial factors. . . . For evidentiary purposes, Plaintiffs may resort to various sources of information, including special interest group position papers, press releases, newspaper articles, census reports, registered voter data and election returns, etc." (cleaned up)); *Page*, 15 F. Supp. 3d at 667 ("[The witness] correctly points out that plaintiffs are generally entitled to rely on circumstantial factors such as district shape, racial bloc voting, low minority registration, and minority retrogression when litigating redistricting decisions."); *League of Women Voters of Mich.*, 2018 WL 2335805, at *5 ("A considerable amount of material relating to the redistricting process is publicly available, including testimony regarding the redistricting process that took place in the public forum, public statements, analyses, amendments, bills, and other information regarding the legislation and its historical context.").

See also supra Section I.

[306] *McMaster*, 584 F. Supp. 3d at 164 (quoting *Benisek*, 241 F. Supp. 3d at 576).

See also, e.g., *Favors I*, 285 F.R.D. at 219 ("[W]hile [the state's redistricting task force] has indeed produced substantial material on its website—including maps, analyses, data, and memoranda—such evidence may provide only part of the story. To the extent that the information sought by the plaintiffs relates to non-public, confidential deliberations that occurred within [the task force] or one of the partisan . . . redistricting offices, or between legislators, their staffs, and retained experts, such information likely cannot be obtained by other means."); *Bethune-Hill*, 114 F. Supp. 3d at 341 ("[T]he availability of alternate evidence does not render the evidence sought [from the legislature] here irrelevant by any measure. . . . [T]he availability of alternate evidence will only supplement—not supplant—the evidence sought by the Plaintiffs. Plaintiffs need not confine their proof to circumstantial evidence. The real proof is what was in the contemporaneous record in the redistricting process." (cleaned up)); *Page*, 15 F. Supp. 3d at 667 (similar).

See also supra Section I.

But see Comm. for a Fair & Balanced Map, 2011 WL 4837508, at *8 (reaching the opposite conclusion that "the availability of other evidence favor[ed] non-disclosure" in redistricting case because the plaintiffs "already ha[d] considerable information at their fingertips" as "a matter of public record," including "public hearing minutes, special interest group position papers, statements made by lawmakers during debate, committee reports, press releases, newspaper articles, census reports, registered voter data and election returns").

enactment of" the redistricting legislation "and legislators' motivation[s] for the enactment."[307] Furthermore, "given the practical reality that officials seldom, if ever, announce on the record that they are pursuing a particular course of action because of their desire to discriminate against a racial minority," courts have generally reasoned that plaintiffs asserting intentional discrimination claims shouldn't be relegated to relying exclusively on evidence to the public legislative record.[308]

As for *Rodriguez*'s third factor—"the 'seriousness' of the litigation and the issues involved"[309]—courts have typically agreed "that racial and malapportionment claims in redistricting cases 'raise serious charges about the fairness and impartiality of some of the central institutions of our state government,'" which "counsel[s] in favor of allowing discovery."[310] Courts have further reasoned that "[t]he federal government has a strong interest in securing the

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[307] *See, e.g.*, *McMaster*, 584 F. Supp. 3d 152, at 164 (cleaned up).

[308] *See Bethune-Hill*, 114 F. Supp. 3d at 341 (quoting *Veasey Dist. Ct. Op.*, 2014 WL 1340077, at *3).

See also, e.g., *McMaster*, 584 F. Supp. 3d at 164 ("[D]irect evidence of discriminatory intent is, for obvious reasons, often difficult to obtain."); *City of Greensboro*, 2016 WL 11660626, at *5; *League of Women Voters of Mich.*, 2018 WL 2335805, at *5.

See also supra Section I.

[309] *See Rodriguez*, 280 F. Supp. 2d at 101 (quoting *Franklin*, 478 F. Supp. at 583).

[310] *See Favors I*, 285 F.R.D. at 219 (quoting *Rodriguez*, 280 F. Supp. 2d at 102).

See also, e.g., *McMaster*, 584 F. Supp. 3d at 165 ("[E]very redistricting case litigated in the federal courts demonstrates that at some juncture, state interests give way when they conflict with the constitutionally guaranteed fundamental right to vote free from racial discrimination. The third factor thus weighs in favor of disclosure."); *Bethune-Hill*, 114 F. Supp. 3d at 341 ("Courts have readily recognized the 'seriousness of the litigation' in racial gerrymandering cases." (quoting *Page*, 15 F. Supp. 3d at 667)); *City of Greensboro*, 2016 WL 11660626, at *5 (concluding that *Rodriguez*'s third factor "weigh[ed] in favor of disclosure" because "the right to vote is fundamental").

equal protection of voting rights guaranteed by the Constitution, an interest that can require the comity interests underlying legislative privilege to yield."[311]

Most courts have likewise determined that *Rodriguez*'s fourth factor—"the role of the government in the litigation"[312]—favors disclosure in redistricting cases because the entity from which the plaintiff seeks discovery—*i.e.*, the state legislature—is the very same entity that enacted the allegedly discriminatory plan.[313] Courts have further reasoned that "the legislative privilege ought to yield to [p]laintiffs' attempt to enforce a substantial public right" in redistricting litigation because "the legislat*ure*—rather than [individual] legislat*ors*—are the target of the remedy" that the plaintiffs seek in such cases.[314]

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[311] *See, e.g.*, *Harris*, 993 F. Supp. 2d at 1070.

In fact, some courts have concluded that the third factor favors disclosure in redistricting cases even when the federal government *isn't* a party to the case—*i.e.*, when the plaintiffs are all private parties. *See, e.g.*, *Page*, 15 F. Supp. 3d at 667 ("Additionally, although this redistricting suit is not brought on behalf of the United States, there can be no question that it raises serious charges about the fairness and impartiality of some of the central institutions of our state government. The Court finds that the nature of the claims in this action weigh strongly in favor of document disclosure." (cleaned up) (quoting *Rodriguez*, 280 F. Supp. 2d at 102)).

[312] *See Rodriguez*, 280 F. Supp. 2d at 101 (quoting *Franklin*, 478 F. Supp. at 583).

[313] *See McMaster*, 584 F. Supp. 3d at 165 ("[T]he fourth factor looks to the role of the Legislature in effecting the alleged constitutional violations in the case. It is undisputed that the [state legislature] enacted the district maps at issue.").

See also, e.g., *Favors I*, 285 F.R.D. at 219–20 ("[T]he state government's role in the instant litigation is direct, and the motives and considerations behind the [redistricting p]lans, to a large degree, *are* the case. Hence, the fourth factor also weighs against issuance of a protective order." (cleaned up) (emphasis added)); *City of Greensboro*, 2016 WL 11660626, at *5 ("As to the role of the government, the subjective decision-making process of the legislature is at the core of the Plaintiffs' claims, thus the legislature's direct role in the litigation supports overcoming the privilege." (cleaned up) (first quoting *Page*, 15 F. Supp. 3d at 666; then quoting *Bethune-Hill*, 114 F. Supp. 3d at 341)).

[314] *See McMaster*, 584 F. Supp. 3d at 165 (emphases added) (quoting *Bethune-Hill*, 114 F. Supp. 3d at 341).

See also, e.g., *Benisek*, 241 F. Supp. 3d at 576 ("Application of the fourth factor—consideration of the role of the State as compared to that of individual legislators—also weighs in favor of the plaintiffs. When individual legislators are the targets of litigation, the possibility of their suffering individualized consequences can significantly increase the need for legislative privilege. But here, the witnesses have no

On the opposite side of the ledger, most courts have readily acknowledged that the fifth *Rodriguez* factor—"the possibility of future timidity by government employees who will be forced to recognize that their secrets are violable"[315]—usually weighs *against* permitting legislative discovery in redistricting cases.[316] Courts have recognized that "present and future legislators and their staff" may undesirably "refrain from engaging in the frank and candid deliberation about, and analysis of, proposed legislation" if plaintiffs "are granted access to state legislators' private communications with other legislators, committee members, or their staff regarding the introduction, consideration, or passage of" legislation.[317]

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personal stake in the litigation and face no direct adverse consequences if the plaintiffs prevail. The plaintiffs have brought their suit not against individual state legislators but against the State's agents who are, in their official capacity, responsible for the electoral process in Maryland, and the adverse impact on the individual legislators is minimal."); *Whitford*, 331 F.R.D. at 379 ("[The fourth *Rodriguez*] factor relates to whether the lawsuit potentially subjects the legislator to personal liability. In this case, as in any gerrymandering case, the answer is no." (citation omitted)).

[315] *See Rodriguez*, 280 F. Supp. 2d at 101 (quoting *Franklin*, 478 F. Supp. at 583).

[316] *See Hall*, 2014 WL 1652791, at *10 ("The fifth factor weighs against disclosure. Courts have long recognized that disclosure of confidential documents and communications concerning intimate legislative activities should be avoided. . . . [I]nquiries regarding the specific motives of individual legislators, or advice and recommendations used by those legislators to support their decision, will encourage timidity and hamper the legislative process." (citations omitted)).

See also, e.g., *League of Women Voters of Mich.*, 2018 WL 2335805, at *5; *Harding*, 2016 WL 7426127, at *6, *13; *Comm. for a Fair & Balanced Map*, 2011 WL 4837508, at *8; *Contreras*, 2021 WL 7709552, at *5–6.

[317] *See League of Women Voters of Mich.*, 2018 WL 2335805, at *5 (cleaned up) (quoting *Mich. State*, 2018 WL 1465767, at *7).

See also, e.g., *Benisek*, 241 F. Supp. 3d at 576 ("There is a good deal of force to the witnesses' argument that questioning legislators about the conversations in which they engaged as they redrew legislative districts strikes at 'the very core' of that protected by the legislative privilege and can tend to undermine the legislators' ability to speak freely and thereby chill a key aspect of the state legislative process."); *Comm. for a Fair & Balanced Map*, 2011 WL 4837508, at *9 ("In the redistricting context, full public disclosure would hinder the ability of party leaders to synthesize competing interests of constituents, special interest groups and lawmakers, and draw a map that has enough support to become law.").

Nevertheless, courts applying the *Rodriguez* framework in redistricting cases have also generally concluded that the fifth factor doesn't outweigh the other four.[318] Courts have reasoned that although forcing legislators to disclose their conversations about the development and enactment of a redistricting plan amounts to a substantial intrusion into the legislative domain, such "conversations could also be the most probative evidence of [discriminatory] intent . . . because they relate to moments when unconstitutional intent may have infected the legislative process."[319] Thus, courts have frequently "conclude[d] that 'comity [to state legislatures] yields'" in the redistricting context "[b]ecause of the importance of the federal interests at stake," and because "evidence of . . . conversations and other communications between and among legislators" "may be crucial to the[] vindication" of those paramount federal interests.[320]

That's not to say, of course, that courts adopting *Rodriguez*'s five-factor framework have treated redistricting lawsuits as a license to ransack legislative offices for hidden evidence of discriminatory intent.[321] To the contrary, courts have recognized that "the extent to which

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[318] *See, e.g.*, *League of Women Voters of Mich.*, 2018 WL 2335805, at *5 (concluding that even though "[t]he fifth [*Rodriguez*] factor weigh[ed] in favor of quashing the" plaintiffs' discovery demands, the plaintiffs' "need for the documents and communications requested" was nevertheless "sufficient to overcome the legislative privilege").

[319] *See, e.g.*, *Benisek*, 241 F. Supp. 3d at 576.

[320] *See, e.g.*, *id.* at 576–77 (quoting *Gillock*, 445 U.S. at 373).

[321] *See, e.g.*, *Favors II*, 2013 WL 11319831, at *15 ("[T]his Court declines to effectively render the legislative privilege a nullity by granting the plaintiffs unfettered access to all materials 'relating to' redistricting."); *Favors I*, 285 F.R.D. at 220 ("It is not sufficient to argue . . . that because redistricting presents a unique legislative situation, allowing discovery here will not weaken the legislative privilege in other areas of public policy and debate within the legislative branch." (citations omitted)).

Cf. Citizens Union, 269 F. Supp. 3d at 167 & n.16 (opining that even in "the extraordinary circumstance where discovery into the legislative decisionmaking process" is "relevant because intent is an element of the claim or otherwise important to establishing the claim" (such as in redistricting cases),

inquiry into" internal legislative affairs is permissible in any particular case "should correspond with the degree to which the intrusion is absolutely necessary."[322]

To that end, courts applying the *Rodriguez* test in redistricting cases haven't always given plaintiffs as much legislative discovery as they wanted. For instance, a few courts have let plaintiffs obtain internal legislative *documents* bearing on the legislature's intent, but prohibited them from also *deposing* legislators about their intent.[323] *Rodriguez* itself, meanwhile, only let the plaintiffs obtain discovery from a redistricting task force consisting of both legislators and non-legislators;[324] the court forbade the plaintiffs from also taking the more intrusive step of "seek[ing] information concerning the *actual deliberations* of the Legislature—or individual legislators—which took place *outside*" that task force, or that occurred "*after* the proposed redistricting plan reached the floor of the Legislature."[325] Other courts, meanwhile, have

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"discovery . . . into legislative motives and predecisional documents still must be narrowly tailored," and "only limited intrusion into legislative motives . . . may be permitted").

[322] *See, e.g.*, *City of Greensboro*, 2016 WL 11660626, at *7 (quoting *Veasey Dist. Ct. Op.*, 2014 WL 1340077, at *3).

[323] *See, e.g.*, *id.* ("The Court finds that the cost and inconvenience of deposition testimony . . . would be far more burdensome than any benefit from such testimony, *particularly in light of the documents that Legislative Respondents are ordered to produce*. . . . *[P]rohibiting deposition testimony but requiring Legislative Respondents to produce certain documents* strikes the appropriate balance between protecting the legislative process and the need to ensure that Individual Plaintiffs' constitutional rights are not violated." (cleaned up) (emphases added)).

See also supra note 263 and accompanying text (explaining how it may be duplicative (and therefore improper) to let plaintiffs depose legislators about legislative activities when those plaintiffs have already obtained documents evidencing those same activities).

But see, e.g., *Whitford*, 331 F.R.D. at 377–82 (letting redistricting plaintiffs not just depose the Wisconsin State Assembly Speaker, but also obtain much of the documentary discovery they demanded).

[324] *See Rodriguez*, 280 F. Supp. 2d at 92, 101–03.

[325] *Id.* at 103 (emphases added); *see also id.* at 104.

Cf. Marylanders, 144 F.R.D. at 304–05 (opinion of Murnaghan, J. & Motz, J.) (pre-*Rodriguez* case letting plaintiffs depose *non*-legislator members of redistricting advisory committee about the committee's deliberations, but "flatly prohibit[ing]" plaintiffs from deposing *legislators* about "any action

performed an *in camera* inspection to assess document by document whether the plaintiffs' need for any particular piece of evidence outweighed the threat to legislative independence.[326]

The point, though, is that most courts considering redistricting challenges have let plaintiffs obtain at least *some* evidence of the legislature's intent that wasn't already accessible in the public legislative record—as opposed to treating the state legislative privilege as an absolute bar to such discovery.[327] Because—as discussed—Federal Rule of Evidence 501 commands federal courts to apply common law privileges (including the state legislative privilege) the same way they've been "interpreted by United States courts in the light of reason and experience,"[328] the fact that most courts have adopted *Rodriguez*'s five-factor balancing test and authorized at least some legislative discovery in redistricting cases strongly suggests that other courts should do the same.[329]

Finally, *Rodriguez*'s interest-balancing approach also has the added benefit that it faithfully comports with *Trammel*'s admonition "that legislative privilege, like all evidentiary

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which they took after the redistricting legislation reached the floor of the" legislature "because of the direct intrusion of such discovery into the legislative process").

[326] *See, e.g.*, *Favors I*, 285 F.R.D. at 220–21 ("[W]hile the five factors here generally support overcoming the privilege, the threat of inhibiting legislative deliberations hangs in the air. Consequently, the prudent course is for the Court to perform an analysis of the allegedly privileged documents, *in camera*, prior to ruling as to the specific documents (or categories of documents) over which the privilege has been invoked. It is only in this way that the Court can make the contextual investigation necessary to weigh the claim of privilege against the need for disclosure, and to determine whether the defendants have established the requisite good cause to justify the issuance of a protective order." (citations omitted)); *Favors II*, 2013 WL 11319831, at *12–15 (concluding after performing that *in camera* review that the state legislative privilege yielded as to some documents and communications but not others).

[327] *See supra* note 296 and accompanying text.

[328] *See* FED. R. EVID. P. 501; *see also supra* notes 141–142 and accompanying text.

[329] *See, e.g.*, *Pernell*, 84 F.4th at 1355 (Jill Pryor, J., dissenting) (opining that using "the same balancing test to evaluate claims of legislative privilege" that "district courts in numerous other cases" have adopted is most "consistent with Rule 501's command to interpret privileges in light of judicial experience"); *see also supra* notes 294, 296, and accompanying text.

privileges, applies 'only to the very limited extent that a public good transcends the normally predominant principle of utilizing all rational means for ascertaining truth.'"[330]

iii. *Perez*

One example of a redistricting case adopting *Rodriguez*'s balancing approach—and one that's particularly important here because the Fifth Circuit ultimately adopted several of its holdings in a published (and therefore precedential) opinion[331]—is the Western District of Texas's opinion in *Perez v. Perry*.[332]

The plaintiffs in *Perez* attacked the electoral maps that the Texas Legislature enacted in the previous decennial redistricting cycle as intentionally discriminatory.[333] The plaintiffs therefore sought to depose various Texas Legislators and their staffers in the hopes of obtaining evidence of discriminatory intent.[334]

Although the Legislators insisted that the state legislative privilege categorically barred the plaintiffs from conducting those depositions, a three-judge panel of this Court disagreed.[335]

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[330] *See, e.g.*, *Benisek*, 241 F. Supp. 3d at 574–75 (quoting *Trammel*, 445 U.S. at 50); *see also supra* Section II.C.2.a.ii (discussing *Trammel* in depth).

[331] *See infra* Section II.C.2.d (explaining how the Fifth Circuit's published opinion in *Jefferson Community* elevated several of *Perez*'s holdings to the status of binding Fifth Circuit precedent).

[332] *See* 2014 WL 106927.

[333] *See, e.g.*, *Abbott*, 585 U.S. at 584–85 (Supreme Court's subsequent opinion in *Perez*).

[334] *See* 2014 WL 106927, at *1.

[335] *See id.* at *1–3.

However, the panel left open the possibility that it might ultimately sustain legislative privilege objections to *specific deposition questions*. *See id.* at *1, *3 ("[T]he deponent may choose not to answer specific questions, citing the privilege. In that event, Plaintiffs may thereafter file a motion to compel and the Court will thereafter determine whether the privilege . . . is outweighed by a compelling, competing interest."); *see also Perez v. Perry*, No. 5:11-CV-360, 2014 WL 12479575, at *1 (W.D. Tex. July 11, 2014) (subsequently concluding that plaintiff-intervenor failed to "me[et] its burden of establishing that

The panel first adopted *Rodriguez*'s conclusion that, to comport with *Trammel*, the state legislative privilege "must be strictly construed and accepted only to the very limited extent that permitting a refusal to testify or excluding relevant evidence has a public good transcending the normally predominant principle of utilizing all rational means for ascertaining the truth."[336] Having agreed that the privilege is subject to those significant restrictions, the *Perez* panel likewise adopted *Rodriguez*'s conclusion that unlike state legislative *immunity*—which "is absolute"—"the legislative *privilege* for state lawmakers is, 'at best, one which is qualified.'"[337] Finally, the *Perez* court adopted *Rodriguez*'s five-factor balancing test for determining whether the state legislative privilege applied to any particular discovery demand.[338]

iv. District Court Cases Adopting Other Approaches

The foregoing discussion demonstrates that "the clear weight of authority hold[s] that the legislative privilege is qualified and subject to a judicial balancing test" in civil cases—including redistricting cases.[339] Still, that authority isn't unanimous.[340] A minority of district courts have adopted a more absolutist view of the state legislative privilege that categorically forecloses

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the factors outlined in *Rodriguez* . . . weigh[ed] in favor of" compelling Chairman of the Texas House Redistricting Committee to answer certain deposition questions (citation omitted)).

[336] 2014 WL 106927, at *1 (cleaned up) (citing *Rodriguez*, 280 F. Supp. 2d at 93–94); *see also Trammel*, 445 U.S. at 50. *See also supra* Section II.C.2.a.ii (analyzing *Trammel* in depth).

[337] 2014 WL 106927, at *2 (emphases added) (quoting *Rodriguez*, 280 F. Supp. 2d at 95, 100).

[338] *See id.* (citing *Rodriguez*, 280 F. Supp. 2d at 95, 101).

[339] *Favors I*, 285 F.R.D. at 213–17; *see also supra* Section II.C.2.b.ii–iii.

[340] *See, e.g.*, *Cave v. Thurston*, No. 4:18-cv-00342, 2021 WL 4936185, at *4 (E.D. Ark. Oct. 22, 2021) (observing that "courts that have addressed the [state legislative] privilege" have "not agree[d] on its scope"); *Hobart*, 784 F. Supp. 2d at 764 (noting that while some "courts have held that, in civil cases, [the state legislative] privilege must be qualified, not absolute, and must therefore depend on a balancing of the legitimate interests on both sides," other "courts have applied an absolute evidentiary privilege in civil cases" (cleaned up)).

litigants from obtaining discovery regarding legislative motives in civil cases—even when the legislature's intent is a critical element of the plaintiff's claim.[341] However, many of the courts that adopted that expansive view of the state legislative privilege based their conclusions on erroneous premises[342]—often without analyzing (or even mentioning) governing Supreme Court precedents like *Gillock* and *Arlington Heights*.[343]

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[341] *See, e.g.*, *Favors I*, 285 F.R.D. at 213 (noting that a "slim minority of . . . cases have analyzed the [state] legislative privilege under principles governing legislative immunity" rather than "recogniz[ing] a qualified legislative privilege" that "balance[s] the parties' competing interests"); *Bryant*, 2017 WL 6520967, at *5 n.8 (acknowledging "that some courts examining state legislator legislative privilege have found that the privilege is absolute and indistinguishable from the doctrine of legislative immunity," but observing that such cases are "heavily outnumbered by others finding that the privilege is qualified and distinct from legislative immunity").

See also, e.g., *Dyas*, 2009 WL 3151879, at *9 ("[T]he [state legislative] privilege prevents a litigant from deposing an unwilling legislator to probe for evidence with which to support the litigant's challenge to a legislative decision as improperly motivated, procedurally defective or otherwise infirm. . . . [A] litigant cannot ask a legislator questions directly or indirectly probing corporate or individual intent (including, without limitation, questions concerning information considered or made known to the deponent or other legislators; questions concerning the *Arlington Heights* considerations [for determining whether an invidious discriminatory purpose motivated a legislative decision] or others like them; and questions concerning comments made by or to any legislator or group of legislators, before or after enactment). Similarly, a litigant cannot ask a legislator questions directly or indirectly probing the sequence of events leading to the legislative decision (including, without limitation, questions touching on procedure or timing). This list is not exhaustive but merely illustrative.").

Cf. Texas v. Holder, No. 12-128, 2012 WL 13070060, at *1–2 & n.2 (D.D.C. June 5, 2012) (determining that non-redistricting VRA case wasn't sufficiently "extraordinary" to warrant compelling legislators "to reveal [the] subjective motivations" underlying the challenged voting law, but preserving the possibility that the privilege might yield in a different voting rights case).

[342] *See infra* note 364; *see also supra* Section II.C.2.a.iii (identifying and cautioning against those analytical traps).

[343] *See infra* note 365; *see also supra* Section II.C.2.a.iii (analyzing *Gillock* in depth); Section II.C.2.a.i (analyzing *Arlington Heights* in depth).

Take, for instance, *Cunningham v. Chapel Hill, ISD*.[344] In that case, local lawmakers reorganized a school district's maintenance department to eliminate the plaintiff's position as the department's director.[345] The plaintiff accused the district of eliminating his position in retaliation for comments he made about the district's superintendent.[346] Accordingly, the plaintiff sought to depose the lawmakers about their true motivations for reorganizing the department.[347]

Without analyzing (or even mentioning) the aforementioned persuasive authorities subjecting the state legislative privilege to a five-factor balancing test,[348] the *Cunningham* court held that the legislative privilege flatly prohibited the plaintiff from deposing the lawmakers about their motivations.[349] At each step of its analysis, however, the court made case-dispositive analytical errors.

For instance, the court began its analysis by asserting that "[t]he Supreme Court has unequivocally interpreted the *Speech and [sic] Debate Clause* to provide an absolute legislative immunity from liability . . . for state, regional, and local legislators."[350] As noted above, though,

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[344] *See* 438 F. Supp. 2d 718 (E.D. Tex. 2006).

[345] *See id.* at 719.

[346] *See id.*

[347] *See id.* at 719–20 ("Cunningham bases his argument on the premise that one of the elements of his cause of action requires him to prove that his speech was a substantial and motivating factor behind the [School] Board's decisions. Cunningham contends that he cannot prove this element without deposing [the Board's] trustees regarding the Board's motivations for making these decisions.").

[348] *See id.* at 719–24 & nn.1–5; *see also supra* Sections II.C.2.b.i–ii.

[349] *See* 438 F. Supp. 2d at 723–24.

But see id. (nevertheless allowing the plaintiff to depose the lawmakers about actions "that occurred *outside* the sphere of legitimate legislative activities" (emphasis added)).

[350] *See id.* at 720 (emphasis added) (citing *Bogan*, 523 U.S. at 53–54).

the opposite is true.[351] The Supreme Court has in fact held unequivocally that "[t]he Speech or Debate Clause of the United States Constitution is *no more applicable* to the members of state legislatures than to the members of" a regional legislative body.[352]

The *Cunningham* court's mistaken premise that the Speech or Debate Clause applies to state and federal legislators alike led the court to erroneously conclude that state and local legislators enjoy an absolute privilege from compulsory testimony to the same extent as their federal counterparts.[353] Because "the Speech and [sic] Debate Clause prevent[s] the questioning of *congressman* [sic] with regard to their legislative activities,"[354] the court inferred that the Clause likewise protects *local* legislators "from having to testify about actions taken in the sphere of legitimate legislative activity."[355] Because "the rationales for according absolute *immunity* to federal, state, and regional legislators apply with equal force to local legislators," the court reasoned "that the rationales for applying the testimonial *privilege* to federal . . . legislators apply with equal force to local legislators" too.[356]

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[351] *See supra* notes 102–103 and accompanying text.

[352] *See Lake Country Estates*, 440 U.S. at 404 (emphasis added); *see also Gillock*, 445 U.S. at 366 n.5 (noting that, "by its terms," "the Federal Speech or Debate Clause . . . applies only to 'Senators and Representatives'" of the U.S. Congress, not to "state legislators").

[353] *See* 438 F. Supp. 2d at 722.

[354] *See id.* (emphasis added) (citing *Gravel*, 408 U.S. at 616).

[355] *Id.*; *see also id.* at 723 ("The testimonial privilege is an inherent aspect of the legislative immunity that applies to local legislators under the Speech and [sic] Debate Clause of the United States Constitution.").

[356] *See id.* at 722 (emphases added) (quoting *Bogan*, 523 U.S. at 52).

Again, though, binding Supreme Court precedent refutes the premise "that the rationales for applying the testimonial privilege to federal . . . legislators apply with equal force to [state and] local legislators."[357] *Gillock*—which *Cunningham* neither cites nor analyzes[358]—unequivocally states that one of the "[t]wo interrelated rationales [that] underlie the Speech or Debate Clause"—specifically, the federal separation of powers—"gives *no support* to the grant of a privilege to state" or local legislators because states and localities aren't coequal branches of the federal government, and because the Constitution makes federal laws supreme over state and local laws.[359]

The *Cunningham* court did at least acknowledge *Arlington Heights*'s holding that state and local legislators "might be called to the stand at trial to testify concerning the purpose of [an] official action" in "extraordinary instances."[360] But the court stopped short of analyzing whether *Cunningham* was one of those "extraordinary" cases.[361] Nor did the *Cunningham* court follow (or even acknowledge) *Gillock*'s command to balance the "federal interests . . . at stake" against "principles of comity" to determine whether the legislative privilege should yield under *Cunningham*'s specific facts.[362]

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[357] *Contra id.*

[358] *See id.* at 719–24 & nn.1–5.

[359] *See Gillock*, 445 U.S. at 369–71; *see also supra* Section II.C.2.a.iii.

[360] *See* 438 F. Supp. 2d at 721–22 (quoting *Arlington Heights S. Ct. Op.*, 429 U.S. at 268); *see also supra* Section II.C.2.a.i.

[361] *See* 438 F. Supp. 2d at 721–22 (observing merely that *Arlington Heights* "did not identify what might constitute an 'extraordinary' instance").

[362] *Compare Gillock*, 445 U.S. at 373, *with Cunningham*, 438 F. Supp. 2d at 719–24 & nn.1–5.

That's not to imply that the legislative privilege should have yielded under the facts of *Cunningham*, or that *Cunningham* was an "extraordinary" case within the meaning of *Arlington Heights*. It just means that the *Cunningham* court should have performed the interest balancing that *Gillock*

Thus, to the extent *Cunningham* holds that state and local legislators are absolutely "protected by the testimonial privilege from having to testify about actions taken in the sphere of legitimate legislative activity,"[363] it is unpersuasive. And, to the extent other district courts have reached similar conclusions based on other analytical errors[364] or without citing or analyzing the relevant Supreme Court authorities,[365] they're unpersuasive too.

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requires, rather than summarily treating the state legislative privilege as an outright bar to discovery regarding the lawmakers' motives.

[363] *See* 438 F. Supp. 2d at 722.

[364] *See, e.g.*, *Miles-Un-Ltd., Inc. v. Town of New Shoreham*, 917 F. Supp. 91, 98 (D.N.H. 1996) (treating the state legislative privilege and state legislative immunity as effectively coterminous). *But see supra* Section II.C.2.a (explaining why it's erroneous to do so).

Cf. Dyas, 2009 WL 3151879, at *2 & n.3, *6–10 (treating the legislative privilege as effectively coextensive with state legislative immunity—and refusing to even "consider[] . . . th[e] line of authority" holding that "a balancing of interests is required before deciding whether a testimonial privilege exists"—because the plaintiffs didn't "challenge the proposition that the testimonial privilege exists whenever the immunity exists"). *But cf. Ochoa-Salgado v. Garland*, 5 F.4th 615, 619–20 (5th Cir. 2021) (remarking in a different context that "where a party concedes an issue" and a court "relies on that concession[] without further analysis," that court "does not give the issue reasoned consideration" (emphasis omitted)).

Cf. Puente Ariz. v. Arpaio, 314 F.R.D. 664, 670 (D. Ariz. 2016) (declining to follow *Rodriguez* on the ground that the Second Circuit "abrogated *Rodriguez*" in a case called *Almonte v. City of Long Beach*). *But see Bryant*, 2017 WL 6520967, at *8 ("The *Puente Arizona* court . . . found that *Rodriguez* was no longer good law, and had been abrogated by the Second Circuit in *Almonte*. *Almonte* does not, however, appear to have abrogated *Rodriguez*, and this Court can find no other opinion which held similarly. In fact, earlier this year and ten years after the *Almonte* decision, the Fifth Circuit cited *Rodriguez* favorably in [the *Jefferson Community* case discussed below], and, thus, found *Rodriguez* to be good law." (citations omitted)); *id.* at *8 n.9 ("*Almonte* did not address *Rodriguez* or the issue of legislative privilege. Instead, *Almonte* exclusively concerned legislative immunity. And courts in the Second Circuit continue to cite *Rodriguez* as good law . . . ." (citations omitted)); *see also Almonte v. City of Long Beach*, 478 F.3d 100, 107 (2d Cir. 2007) ("[T]he [district court's] denial of legislative *immunity* was incorrect as a matter of law and must therefore be reversed." (emphasis added)).

[365] *See Hum. Res. Rsch. & Mgmt. Grp., Inc. v. County of Suffolk*, No. CV 03-3777, 2008 WL 11449404, at *1 (E.D.N.Y. Apr. 17, 2008) (declaring (without analyzing or mentioning *Arlington Heights* or *Gillock*) that the state legislative privilege categorically "prevent[s] inquiry into the motivation behind legislative acts" and thereby forecloses litigants from obtaining "testimony regarding the reasons why legislators acted as they did"); *I.B.I.D. Assocs. Ltd. P'ship v. Gauthier*, No. 2:22-cv-00954, 2022 WL 1524973, at *1–3 (E.D. Pa. May 13, 2022) (proclaiming (also without analyzing or mentioning *Arlington Heights* or *Gillock*) that "courts do not look behind the curtain to consider the process that brought about a legislative enactment"); *Villareal v. Dallas County*, No. 3:11-cv-2233, 2011 WL 4850258, at *1–3 (N.D. Tex. Sept. 20, 2011) (concluding (also without analyzing or mentioning *Arlington Heights* or *Gillock*) that

c. Contrary Circuit Authorities

The foregoing discussion demonstrates that most federal *district* courts have adopted a qualified conception of the state legislative privilege that balances the competing interests at stake and thereby accords fully with Supreme Court precedent.[366] Recently, however, a small but increasing number of federal *circuit* courts have started adopting a more absolutist conception of the privilege that categorically bars plaintiffs—including plaintiffs raising redistricting challenges—from obtaining nonpublic evidence of legislative intent.[367] Many of those Circuit-

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"any attempt to depose" legislators "must be precluded by law"); *Simpson v. City of Hampton*, 166 F.R.D. 16, 17–19 (E.D. Va. Apr. 16, 1996) (ruling (also without citing *Arlington Heights* or *Gillock*) that although the plaintiffs "could undertake to prove the [defendant city] council intended to discriminate, . . . their undertaking [could] not include the use of the council's personal notes and files").

See also Kay, 2003 WL 25294710, at *13 (observing that many "[o]f the cases recognizing an absolute legislative privilege against giving testimony" do not "mention[] *Gillock*").

[366] *See supra* Section II.C.2.b.i–iii.

[367] *See, e.g.*, *N.D. Legis. Assembly*, 70 F.4th at 463 (proclaiming that the legislative privilege "is an absolute bar to interference" with state legislatures, no matter "[t]he degree of intrusion" (cleaned up)); *In re Hubbard*, 803 F.3d 1298, 1310 (11th Cir. 2015) (declaring without qualification that the state legislative privilege "applies with full force against requests for information about the motives for legislative votes and legislative enactments"); *Pernell*, 84 F.4th at 1334 (holding that the state legislative privilege "is insurmountable in private civil actions under" the federal civil rights statute); *EEOC v. Wash. Suburban Sanitary Comm'n*, 631 F.3d 174, 181 (4th Cir. 2011) (suggesting without qualification that if "the [federal government] or private plaintiffs sought to compel information from legislative actors about their legislative activities," those legislative actors "would not need to comply" (citing *Burtnick v. McLean*, 76 F.3d 611, 613 (4th Cir. 1996))); *Lee v. City of Los Angeles*, 908 F.3d 1175, 1181, 1186–88 (9th Cir. 2018) [hereinafter *Lee*] (holding that the legislative privilege barred the plaintiffs from deposing local lawmakers about "any legislative acts, motivations, or deliberations pertaining to . . . [a] redistricting ordinance" they were challenging as intentionally discriminatory).

But cf. Alviti, 14 F.4th at 81–82, 88–90 (Circuit-level case holding that "proof of the subjective intent of state lawmakers [was] unlikely to be significant enough . . . to warrant setting aside the privilege" in a Dormant Commerce Clause case where the law's *effects* would matter far more than the legislature's *intent*, but leaving open "the possibility that there might be" some other category of "private civil case in which" the state legislative privilege "must be set to one side because the case turns so heavily on subjective motive or purpose"); *Grand Jury*, 821 F.2d at 958 (pre-*Rodriguez* Circuit-level case "refus[ing] to recognize" even "a qualified privilege" for state legislators, but leaving open "the possibility [that] a more narrowly tailored privilege for confidential deliberative communications" might exist).

level cases misapply or misinterpret Supreme Court precedent by overlooking the critical differences between immunity and privilege and between state and federal legislators.[368] Moreover, by rejecting the weight of persuasive authority following *Gillock*'s command to balance the threat to legislative independence against the requested discovery's importance[369]—or, in some cases, by ignoring that authority entirely[370]—those cases contravene Federal Rule of

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[368] *See, e.g.*, *Lee*, 908 F.3d at 1181, 1187 ("While *Tenney*'s holding rested upon a finding of immunity, its logic supports extending the corollary legislative privilege from compulsory testimony to state and local officials as well. . . . The rationale for the privilege—to allow duly elected legislators to discharge their duties without concern of adverse consequences outside the ballot box—applies equally to federal, state, and local officials."); *N.D. Legis. Assembly*, 70 F.4th at 463 ("State legislators enjoy a privilege under the federal common law that largely approximates the protections afforded to federal legislators under the Speech or Debate Clause of the Constitution. . . . In civil litigation, there is no reason to conclude that state legislators and their aides are entitled to lesser protection than their peers in Washington." (cleaned up)).

Compare Hubbard, 803 F.3d at 1310 & n.11 (relying on federal legislative privilege and state legislative immunity cases for propositions about the state legislative privilege), *with Bryant*, 2017 WL 6520967, at *9 n.10 (criticizing *Hubbard* for "not recogniz[ing the] distinction between the concepts of legislative privilege, legislative immunity, and the Speech and [sic] Debate Clause as applied to state legislators").

See also supra Section II.C.2.a (explaining why it's hazardous to import principles from the *federal* legislative privilege and state legislative *immunity* contexts into the *state* legislative *privilege* context).

[369] *See N.D. Legis. Assembly*, 70 F.4th at 465 ("*Arlington Heights* does not support the use of a five-factor balancing test in lieu of the ordinary rule that inquiry into legislative conduct is strictly barred by the privilege."); *Pernell*, 84 F.4th at 1344 ("[W]e are reluctant to adopt a manipulable balancing test . . . that links the derogation of the legislative privilege to a subjective judgment of the case's importance.").

[370] *See, e.g.*, *Hubbard*, 803 F.3d at 1301–15 & nn.1–15 (failing to acknowledge *Rodriguez* or any of the numerous cases adopting its five-factor test).

Compare Lee, 908 F.3d at 1178–88 nn.1–12 (redistricting case failing to acknowledge the substantial body of authority adopting and applying *Rodriguez*'s balancing test in the redistricting context), *with Whitford*, 331 F.R.D. at 378 ("[T]he persuasive force of *Lee* is limited because . . . the court did not acknowledge any of the cases from other courts discussing the unique nature of gerrymandering claims.").

But see supra Section II.C.2.b.i–iii (identifying numerous cases adopting just such a balancing test).

Evidence 501's command to apply common law privileges the way they've been "interpreted by United States courts in the light of reason and experience."[371]

An illustrative example of such a case—and one that bears heavily on the analysis below[372]—is the Ninth Circuit's decision in *Lee v. City of Los Angeles*.[373] The plaintiffs in *Lee*—just like the Plaintiffs in our case—challenged a redistricting plan as intentionally discriminatory.[374] The district court issued a protective order barring the plaintiffs from "questioning [the lawmakers] regarding any legislative acts, motivations, or deliberations pertaining to the . . . redistricting ordinance."[375]

On appeal, the Ninth Circuit ruled "that the district court properly denied discovery on the ground of legislative privilege."[376] In reaching that conclusion, however, the Ninth Circuit committed several analytical errors.

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[371] *See* FED. R. EVID. P. 501; *see also supra* notes 141–142, 328–329, and accompanying text.

Cf., e.g., *In re Grand Jury Matters*, 751 F.2d 13, 18 (1st Cir. 1984) (opining in a different context that "[j]udges may not . . . create new privileges or enlarge or distort existing ones").

[372] *See infra* Section II.C.2.f.ii (explaining how the Fifth Circuit cited *Lee* favorably in a later legislative privilege case called *Hughes*).

[373] 908 F.3d 1175.

[374] *See id.* at 1178.

[375] *Id.* at 1181.

[376] *Id.* at 1188.

First, the Ninth Circuit relied heavily on state and federal legislative *immunity* cases like *Tenney*, *Bogan*, and *Eastland* to support propositions about the state legislative *privilege*.[377] As the reader will recall, *Tenney* holds that state legislators enjoy *immunity* from suit and liability under the *common law* to the same extent that federal legislators enjoy immunity under the *Speech or Debate Clause*.[378] Although the Ninth Circuit expressly recognized that "*Tenney*'s holding rested upon a finding of immunity" rather than privilege, it nonetheless reasoned that *Tenney* "support[ed] extending the corollary legislative *privilege from compulsory testimony*" that federal legislators possess "to state and local officials as well."[379] The Ninth Circuit reached that conclusion even though it fully recognized that one of the twin rationales that undergird the *federal* legislative privilege—namely, preserving the constitutional separation of powers—doesn't apply to state legislators.[380] The court reasoned that the other rationale for the federal

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[377] *See id.* at 1187–88.

See also supra Section II.C.1 (analyzing *Tenney* and *Bogan* in depth); Section II.B.1.a (analyzing *Eastland* in depth).

But see supra Section II.C.2.a (explaining why it's hazardous to cite state and federal legislative immunity cases for propositions about the state legislative privilege).

[378] *See, e.g.*, *Supreme Court of Virginia*, 446 U.S. at 732 (explaining that *Tenney* stands for the proposition that "state legislators enjoy common-law immunity from liability for their legislative acts" that is "similar in origin and rationale to that accorded Congressmen under the Speech or Debate Clause").

[379] *See* 908 F.3d at 1187 (emphasis added).

[380] *See id.* at 1187 n.11 ("We recognize, however, that certain . . . concerns addressed by the legislative privilege are specific to federal legislators, such as the separation of powers principles that undergird the Speech and [sic] Debate Clause of the Constitution." (citing *Gillock*, 445 U.S. at 370, 372 n.10)).

See also Gillock, 445 U.S. at 369–70 ("Two interrelated rationales underlie the Speech or Debate Clause . . . . The first rationale, resting solely on the separation of powers doctrine, gives no support to the grant of a privilege to state legislators . . . .").

See also supra notes 216–218 and accompanying text.

legislative privilege—"the need to insure legislative independence"[381]—alone justified recognizing a state legislative privilege of comparable breadth.[382] "Like their federal counterparts," the Ninth Circuit opined, "state and local officials undoubtedly share an interest minimizing the distraction of diverting their time, energy, and attention from their legislative tasks to defend the litigation."[383] Thus, asserted the Ninth Circuit, "[t]he rationale for the privilege—to allow duly elected legislators to discharge their public duties without concern of adverse consequences outside the ballot box—applies equally to federal, state, and local officials."[384]

The problem with that reasoning is that the Supreme Court considered and rejected that very argument in *Gillock*.[385] Just like the *Lee* court,[386] the defendant in *Gillock* "relie[d] heavily on *Tenney*" to support his position that "the need to [e]nsure legislative independence" warranted recognizing a common-law privilege for state legislators equivalent to the privilege that federal legislators enjoy under the Speech or Debate Clause.[387] Yet the *Gillock* Court held that the concerns about "disruption of the state legislative process" noted in *Tenney* didn't alone justify creating the defendant's proposed privilege.[388] That's partly because, compared to a denial of

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[381] *See Gillock*, 445 U.S. at 371; *see also supra* notes 64–65 and accompanying text.

[382] *See* 908 F.3d at 1187.

[383] *Id.* (cleaned up) (quoting *Eastland*, 421 U.S. at 503).

[384] *Id.*

[385] *See Gillock*, 445 U.S. at 371–73; *see also supra* Section II.C.2.a.iii.

[386] *See* 908 F.3d at 1186–87 (citing *Tenney*, 341 U.S. at 369, 373–75, 378–79).

[387] *See Gillock*, 445 U.S. at 368, 371.

[388] *See id.* at 371–73; *see also id.* at 372 ("Although *Tenney* reflects this Court's sensitivity to interference with the functioning of state legislators, we do not read that opinion as broadly as Gillock would have us.").

state legislative "*immun[ity]* from civil suits," the mere "denial of a *privilege* to a state legislator" may have a comparatively "minimal impact on the exercise of his legislative function."[389] Thus, the Supreme Court concluded, the "recognition of an evidentiary privilege for state legislators for their legislative acts" would confer "only speculative benefit to the state legislative process."[390]

Lee doesn't reckon with—or even acknowledge—that passage from *Gillock*.[391] Thus, to the extent *Lee* suggests that legislative independence concerns, by themselves, "support[] extending the . . . legislative privilege from compulsory testimony" that federal legislators enjoy "to state and local officials as well,"[392] it's inconsistent with binding Supreme Court precedent.

The Ninth Circuit did at least acknowledge *Arlington Heights*'s holding that, in "extraordinary instances," the state legislative privilege "must yield to the need for a decision maker's testimony."[393] The court nonetheless concluded, however, that the intentional racial discrimination claims that the plaintiffs asserted in *Lee* weren't "extraordinary" enough to overcome the privilege.[394]

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[389] *See id.* at 371, 373 (emphases added).

[390] *See id.* at 373.

[391] *Compare id.* at 371–73, *with Lee*, 908 F.3d at 1187 nn.10–11 (citing *Gillock*, but for other propositions).

[392] *See Lee*, 908 F.3d at 1187.

[393] *See id.* at 1187–88 (quoting *Arlington Heights S. Ct. Op.*, 429 U.S. at 268 & n.18).

[394] *See id.* at 1188.

The Ninth Circuit reached that conclusion even though it conceded "that claims of racial gerrymandering involve serious allegations."[395] The court also recognized that it was prohibiting the plaintiffs from questioning the legislators about the core issue in the case: namely, whether "race was the predominant factor motivating the legislature's decision to place a significant number of voters within or without a particular district."[396] The court reasoned, however, that "*Arlington Heights* itself also involved an equal protection claim alleging racial discrimination—putting the government's intent directly at issue—but nonetheless suggested that such a claim was not, in and of itself, within the subset of 'extraordinary instances' that might justify an exception to the privilege."[397]

But *Arlington Heights* doesn't suggest that "an equal protection claim alleging racial discrimination" that places "the government's intent directly at issue" does "not, in and of itself," qualify for the "extraordinary instances" exception to the privilege.[398] If anything, *Arlington Heights* suggests the contrary. As discussed, *Arlington Heights* explicitly states in a footnote that "an inquiry into" the legislators' "motivation at the time they cast their votes" might "*otherwise have been proper*" if the plaintiffs hadn't "repeated[ly] insist[ed] that it was effect and not motivation which would make out a constitutional violation."[399] Yet *Lee* neither analyzes nor

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[395] *Id.*

[396] *Compare id.* at 1182 (quoting *Cooper v. Harris*, 581 U.S. 285, 291 (2017)), *and id.* at 1188 (acknowledging that the plaintiffs' claims "directly implicate[d] the government's intent"), *with id.* at 1181 (affirming the district court's decision to "prohibit[] [the p]laintiffs from questioning City officials regarding [their] . . . motivations").

[397] *Id.* at 1188 (quoting *Arlington Heights S. Ct. Op.*, 429 U.S. at 268).

[398] *Contra id.* (quoting *Arlington Heights S. Ct. Op.*, 429 U.S. at 268).

[399] *See* 429 U.S. at 270 n.20 (emphasis added); *see also supra* Section II.C.2.a.i.

acknowledges that footnote.[400] Nor does *Lee* reckon with (or even mention) the fact that the plaintiffs in *Arlington Heights* "*were* allowed, both during the discovery phase and at trial, to question Board members fully about materials and information available to them at the time of decision"—without any apparent disapproval from the Supreme Court.[401] It was therefore a mistake for *Lee* to read *Arlington Heights* to imply that racial discrimination claims that directly implicate a legislature's intent don't suffice to overcome the privilege.

Finally, *Lee* is also flawed for the additional reason that fails to reconcile itself with (or even mention) the Supreme Court's binding holding in *Trammel*.[402] As noted, *Trammel* establishes that "[t]estimonial exclusionary rules and privileges"—including the legislative privilege that the Ninth Circuit invoked to bar the deposition testimony in *Lee*—"contravene the fundamental principle that the public has a right to every man's evidence," and such privileges must therefore "be strictly construed and accepted only to [a] very limited extent."[403] There's nothing "strict" or "limited" about a testimonial privilege that categorically bars litigants from obtaining evidence of legislative intent in redistricting cases where the legislature's intent is the central issue.[404] For those reasons, *Lee*—like other cases adopting a similarly expansive view of the state legislative privilege—is unpersuasive.

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[400] *See* 908 F.3d at 1187–88.

[401] *Compare Arlington Heights S. Ct. Op.*, 429 U.S. at 270 n.20 (emphasis added), *with Lee*, 908 F.3d at 1187–88.

[402] *See generally* 908 F.3d at 1178–88.

[403] *Trammel*, 445 U.S. at 50 (cleaned up) (first quoting *Bryan*, 339 U.S. at 331; then quoting *Elkins*, 364 U.S. at 234 (Frankfurter, J., dissenting)); *see also supra* Section II.C.2.a.ii.

[404] *Contra Lee*, 908 F.3d at 1188 (concluding that "claims of racial gerrymandering" don't "justify an exception to the [state legislative] privilege" even though such claims "involve serious allegations" that "put[] the government's intent directly at issue").

d. *Jefferson Community*

At least at first, though, the Fifth Circuit remained on the doctrinally defensible side of that growing judicial divide. In a case called *Jefferson Community Health Care Centers, Inc. v. Jefferson Parish Government*,[405] the Fifth Circuit espoused the qualified conception of the state legislative privilege that the majority of courts had adopted,[406] as opposed to the absolutist view that only a handful of courts had then embraced.[407]

The plaintiff in *Jefferson Community* was a nonprofit organization that administered medical services to residents of a Louisiana parish.[408] The Parish initially let the plaintiff occupy several facilities that the Parish owned so it could provide healthcare to the Parish's residents.[409]

Eventually, however, the Parish passed legislative resolutions evicting the plaintiff from each of the Parish's facilities.[410] The plaintiff alleged that the Parish enacted those resolutions for an improper reason—namely, because the plaintiff wouldn't "allow one of the [Parish's]

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[405] *See* 849 F.3d at 624.

[406] *See supra* Section II.C.2.b.i–iii.

[407] *See supra* Sections II.C.2.b.iv and II.C.2.c.

[408] 849 F.3d at 619.

A "parish" is a Louisianan municipal unit roughly equivalent to what other states might call a "county." *See, e.g.*, *In re Banks*, No. 17-10456, 2018 WL 735351, at *5 n.8 (Bankr. W.D. La.), *aff'd sub nom.*, *Law Solutions Chi. LLC v. U.S. Tr.*, 592 B.R. 624 (W.D. La. 2018), *aff'd*, 770 F. App'x 168 (5th Cir. 2019).

[409] 849 F.3d at 619–20.

[410] *Id.* at 619–21.

councilmembers to unlawfully influence [the plaintiff's] affairs."[411] The plaintiff therefore sued the Parish to stop the eviction.[412]

The Parish argued that, for the plaintiff to ultimately prevail, it would need to conduct discovery regarding the "thought processes and motivations underlying the [Parish] Council's decision to enact the resolutions."[413] Much like the Legislators in our case,[414] however, the Parish insisted that the legislative privilege would categorically bar the plaintiff from probing "the councilmembers' motivations and thought processes."[415] The Parish therefore contended that the plaintiff had no way to obtain the evidence it needed to win the case—and, thus, that the plaintiff's claim was "so devoid of merit that it fail[ed] to present a federal question" over which the court could exercise subject matter jurisdiction.[416]

The Fifth Circuit unanimously disagreed.[417] The Fifth Circuit first adopted *Perez*'s holding that "[w]hile the common-law legislative *immunity* for state legislators is absolute, the legislative *privilege* for state lawmakers is, at best, one which is qualified."[418] Then, echoing

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[411] *Id.* at 619.

[412] *Id.*

[413] Appellant's Original Br. at 32–33, *Jefferson Cmty. Health Care Ctrs., Inc. v. Jefferson Par. Gov't*, No. 16-30875 (5th Cir. Sept. 19, 2016), ECF No. 59-1 [hereinafter *Jefferson Cmty. Appellants' Br.*]

[414] *See, e.g.*, State Defs.' & Legis. Subpoena Recipients' Suppl. Br. at 7 (contending that the state legislative privilege "squarely foreclose[s]" Plaintiffs from obtaining any "documents from the legislators to support their disputed allegations regarding the legislators' intent and motive in enacting" the redistricting plans at issue here).

[415] *Jefferson Cmty. Appellants' Br.* at 32–33.

[416] *Id.*

[417] *See* 849 F.3d at 624.

[418] *See id.* (emphases added) (quoting *Perez*, 2014 WL 106927, at *2); *see also supra* Section II.C.2.b.iii (discussing *Perez* at length).

Trammel,[419] the Fifth Circuit likewise adopted *Perez*'s holding that the state legislative privilege "must be strictly construed and accepted only to the very limited extent that permitting a refusal to testify or excluding relevant evidence has a public good transcending the normally predominant principle of utilizing all rational means for ascertaining the truth."[420]

By adopting that narrow conception of the state legislative privilege, the *Jefferson Community* court necessarily rejected the Parish's argument that the privilege categorically "foreclose[d any] inquiry into" the "thought processes and motivations underlying the [Parish's] decision to enact the resolutions at issue."[421]

In the alternative, however, the Fifth Circuit also held that "*even assuming* that the councilmembers' reasons for passing the resolutions *[we]re* privileged in the sense that they [could not] be directly compelled to disclose them," the court still wouldn't dismiss the claim in its entirety as the Parish requested, because an "evidentiary privilege cannot bar the adjudication of a claim."[422]

District Courts in this Circuit generally interpreted *Jefferson Community* to stand for the proposition that the state legislative privilege is not an impenetrable bulwark against discovery, but instead requires courts to balance the competing interests on both sides.[423] Moreover,

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[419] *See supra* Section II.C.2.a.ii.

[420] *See* 849 F.3d at 624 (quoting *Perez*, 2014 WL 106927, at *1).

[421] *Compare Jefferson Cmty. Appellants' Br.* at 33, *with Jefferson Cmty.*, 849 F.3d at 624. *See also infra* Section III.C (further developing that argument).

[422] 849 F.3d at 624 (emphases added); *see also infra* Section III.D (discussing *Jefferson Community*'s alternative holdings in greater depth and explaining why they have precedential force).

[423] *See, e.g.*, *TitleMax Tex., Inc. v. City of Dallas*, No. 3:21-cv-1040, 2022 WL 326566, at *4–5 (N.D. Tex. Feb. 3, 2022) (reading *Jefferson Community* to "embrace[] the qualified approach" to the state legislative privilege, whereby the privilege's applicability "in civil cases . . . depend[s] on a balancing of the legitimate interests on both sides" (first quoting *Hobart*, 784 F. Supp. 2d at 763–64; then citing

although *Jefferson Community* didn't explicitly decide whether to adopt *Rodriguez*'s five-factor test for performing that interest balancing,[424] courts in this Circuit generally inferred from the fact that *Jefferson Community* adopted *Perez*'s articulation of the governing legal standards to mean that the Fifth Circuit also approved *Perez*'s decision to adopt *Rodriguez*'s multifactor balancing framework.[425] Thus, between the date the Fifth Circuit decided *Jefferson Community* and the date it decided the *Hughes* case discussed below,[426] courts in this Circuit generally followed *Perez*'s example and applied *Rodriguez*'s five-factor balancing framework when adjudicating state legislative privilege claims.[427]

Jefferson Cmty., 849 F.3d at 624)); *Bryant*, 2017 WL 6520967, at *6 (citing *Jefferson Community* for the proposition that "[t]he Fifth Circuit has held that the [state] legislative privilege is . . . limited in scope").

[424] *See* 849 F.3d at 624; *see also* Section II.C.2.b.i (analyzing *Rodriguez* in depth).

[425] *See, e.g.*, *Bryant*, 2017 WL 6520967, at *6 (observing that *Jefferson Community* "cited . . . [a] case[] stemming from" *Rodriguez* (*i.e.*, *Perez*) "as providing the relevant analysis and law" (citing *Jefferson Cmty.*, 849 F.3d at 624)); *id.* at *7 (inferring from the fact that *Jefferson Community* "favorably cited and quoted from *Perez* with regard to the qualified nature of the [state legislative] privilege in general" that the *Jefferson Community* court implicitly approved *Perez*'s other legal conclusions as well); *id.* at *8 ("[T]he Fifth Circuit cited *Rodriguez* favorably in *Jefferson*, and, thus, found *Rodriguez* to be good law.").

See also supra Section II.C.2.b.iii (discussing *Perez* in greater depth, including how *Perez* adopted *Rodriguez*'s five-factor balancing test).

[426] *See infra* Section II.C.2.f.ii.

[427] *See TitleMax*, 2022 WL 326566, at *5 ("'Courts in the Fifth Circuit examining the extent to which state legislative privilege is qualified have cited *Rodriguez*, or cases stemming from it, as providing the relevant analysis and law' and 'have adopted the five *Rodriguez* factors in determining whether legislative privilege applies.'" (quoting *Bryant*, 2017 WL 6520967, at *6)).

See also, e.g., *Petteway v. Galveston County*, No. 3:22-cv-00057, 2023 WL 3452065, at *7–8 (S.D. Tex. May 15, 2023) (adopting the *Rodriguez* factors); *Angelicare*, 2018 WL 1172947, at *8–9 (same); *La Union del Pueblo Entero v. Abbott*, No. 5:21-CV-00844, 2022 WL 1667687, at *2 (W.D. Tex. May 25, 2022) [hereinafter *Hughes Dist. Ct. Op.*] (same).

But see Shreveport Chapter #237 of United Daughters of the Confederacy v. Caddo Par. Comm'n, No. 17-1346, 2018 WL 1973283, at *3–4 (W.D. La. Apr. 26, 2018) (post-*Jefferson Community* legislative privilege case appearing to implicitly reject *Rodriguez*'s five-factor balancing test, albeit without analyzing or mentioning *Jefferson Community*).

e. The Instant Case

In fact, this very panel applied *Jefferson Community* to reject the Texas Legislators' absolutist conception of the state legislative privilege at an earlier stage of this very case, and the Fifth Circuit confirmed that we were on the right track.

i. Our Legislative Deposition Order

Back in 2022, the Plaintiffs in this case issued deposition subpoenas to various Texas Representatives.[428] Arguing that the state legislative privilege barred Plaintiffs from questioning them about "the Legislators' motive or intent," the Representatives moved to quash the subpoenas.[429]

We unanimously denied the Representatives' motion.[430] We readily acknowledged that, under *Tenney* and *Bogan*, "state legislators enjoy broad *immunity from suit* for actions they take during the course of their legislative duties."[431] But because "the questions confronting this Court [we]re ones of state legislative *privilege*, *not* immunity," we concluded that *Tenney* and *Bogan*'s holdings granting absolute immunity to state legislators didn't control our legislative privilege determinations.[432]

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[428] *See League of United Latin Am. Citizens v. Abbott*, No. 3:21-CV-00259, 2022 WL 1570858, at *1 (W.D. Tex. May 18, 2022) [hereinafter *LULAC Dep. Subpoena Op.*].

[429] *Id.* at *1–2.

[430] *Id.* at *1, *3.

[431] *See id.* at *1 (emphasis added) (first citing *Tenney*, 341 U.S. at 372–78; then citing *Bogan*, 523 U.S. at 54–55); *see also supra* Sections II.C.1.a–b (discussing *Tenney* and *Bogan* in greater depth).

[432] *See* 2022 WL 1570858, at *1 (emphasis added); *see also supra* Section II.C.2.a (explaining why courts shouldn't rely on state legislative *immunity* cases like *Tenney* and *Bogan* for propositions about the state legislative *privilege*).

To the contrary, we explained, the state legislative privilege "is not coextensive with state legislative immunity."[433] Quoting directly from *Jefferson Community* while also citing *Gillock*, we reiterated that the state legislative privilege "is, at best, one which is qualified."[434] We therefore held—again quoting directly from *Jefferson Community* while also echoing *Trammel*—that the state legislative privilege "must be strictly construed and accepted only to the very limited extent that permitting a refusal to testify or excluding relevant evidence" would serve "a public good transcending the normally predominant principle of utilizing all rational means for ascertaining the truth."[435] Thus, in setting out the applicable legal standard governing the Legislators' privilege assertions, we followed Supreme Court precedent and then-existing Fifth Circuit precedent to the letter.

We then applied that standard to the facts of the case by following *Gillock*'s command to balance "the need to [e]nsure legislative independence" against the importance of the "federal interests at stake" here.[436] Quoting the portion of *Gillock* stating that the mere "denial of a privilege to a state legislator" has a relatively "minimal impact on the exercise of his legislative function," we reasoned that "the burden of having to sit for a deposition" did not "outweigh[] the relevant information the United States and private Plaintiffs [might] obtain" from the Texas

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[433] *See* 2022 WL 1570858, at *2 (first citing *Jefferson Cmty.*, 849 F.3d at 624; then citing *Rodriguez*, 280 F. Supp. 2d at 94–104).

[434] *See id.* at *1 (first quoting *Jefferson Cmty.*, 849 F.3d at 624; then citing *Gillock*, 445 U.S. at 373); *see also supra* Section II.C.2.d (discussing *Jefferson Community*); Section II.C.2.a.iii (discussing *Gillock*).

[435] *See* 2022 WL 1570858, at *1 (quoting *Jefferson Cmty.*, 849 F.3d at 624); *see also supra* Section II.C.2.a.ii (discussing *Trammel*).

[436] *Compare Gillock*, 445 U.S. at 371, 373, *with LULAC Dep. Subpoena Op.*, 2022 WL 1570858, at *2.

Representatives.[437] We therefore ordered the parties to "proceed with [the] depositions,"[438] and informed them that only if a legislator "invoke[d] legislative privilege in response to particular questions" would we then perform the context-specific task of determining whether the privilege shielded any particular piece of information.[439]

ii. The Fifth Circuit's Opinion Denying a Stay

The Fifth Circuit validated our conclusions when, just two days later, it rejected the Legislators' request to stay our legislative privilege order pending appeal.[440] Citing *Jefferson Community* and *Gillock*, the Fifth Circuit first agreed that "[b]oth [the Fifth Circuit] and the Supreme Court have confirmed that the state legislative privilege is not absolute."[441] Then, citing the passage of *Arlington Heights* contemplating that lawmakers "might be called to the stand at trial to testify concerning the purpose of [an] official action," the Fifth Circuit further

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[437] *See* 2022 WL 1570858, at *2 (quoting *Gillock*, 445 U.S. at 373).

[438] *Id.* at *3.

[439] *Id.*; *see also id.* at *1 ("At this juncture, the Court is not positioned to rule on what information may or may not be the subject of state legislative privilege. Whether state legislative privilege attaches is fact- and context-specific; for the purposes of depositions, it depends on the question being posed. Here, no questions have been asked, and no answers given. Suffice it to say, the privilege is not so broad as to compel the Court to quash the deposition subpoenas [entirely] . . . ." (cleaned up)); *id.* at *3 ("[N]othing in this Order should be construed as deciding any issue of state legislative privilege. The Court will be better positioned to make decisions on state legislative privilege if the issue comes more squarely before the Court—that is, if the Court is presented with specific questions and specific invocations of state legislative privilege.").

[440] *See LULAC 5th Cir. Op.*, 2022 WL 2713263, at *1–2.

Because the Fifth Circuit didn't publish its opinion denying a stay in our case, *see id.* at *1, that opinion didn't bind the Fifth Circuit panel that decided the *Hughes* case discussed below, *see* 5TH CIR. R. 47.5.4 (providing (with limited exceptions) that "[u]npublished [Fifth Circuit] opinions issued on or after January 1, 1996, are not precedent"); *see also infra* Section II.C.2.f.ii (analyzing *Hughes*). *But see infra* Section III (explaining that the *Hughes* panel was at least required to follow *Jefferson Community*).

[441] 2022 WL 2713263, at *1 (first citing *Jefferson Cmty.*, 849 F.3d at 624; then citing *Gillock*, 445 U.S. at 361).

remarked that "[t]he state legislative privilege . . . must not be used as a cudgel . . . to prevent the discovery of the truth in cases where the federal interests at stake outweigh the interests protected by the privilege."[442] Opining that we had "carefully considered the issue of legislative privilege *and neutrally followed the law of this circuit*," the Fifth Circuit declined the Legislator's request to stay the depositions pending appeal.[443]

iii. Our Documentary Discovery Order

Encouraged by the Fifth Circuit's assurance that we were correctly applying the governing law, we followed a similar approach when we granted the United States' motion to enforce subpoenas for legislative documents.[444] Heeding *Arlington Heights*'s cautionary command that "judicial inquiries into legislative motivation" will "frequently" (but not always) "be barred by privilege,"[445] we readily acknowledged that the state legislative privilege sometimes protects "documents or information that contains or involves opinions, motives, recommendations or advice about legislative decisions between legislators or between legislators and their staff."[446] Quoting from *Jefferson Community*, however, we emphasized that unlike the "absolute" "common-law legislative *immunity* for state legislators," "the legislative *privilege* for

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[442] *Id.* at *2 (citing *Arlington Heights S. Ct. Op.*, 429 U.S. at 268).

[443] *Id.* at *1 & n.2 (emphasis added).

The Supreme Court likewise declined to stay the depositions, albeit without comment. *See Guillen v. League of United Latin Am. Citizens*, 142 S. Ct. 2773 (2022) ("Application for stay presented to Justice Alito and by him referred to the Court denied.").

[444] *See LULAC Doc. Subpoena Op.*, 2022 WL 2921793, at *1–15.

[445] *See Arlington Heights S. Ct. Op.*, 429 U.S. at 268 & n.18 (1977); *see also supra* Section II.C.2.a.i (analyzing *Arlington Heights* in depth).

[446] *See* 2022 WL 2921793, at *2 (quoting *Bryant*, 2017 WL 6520967, at *7).

state lawmakers is, at best, one which is qualified."[447] We therefore chided the Legislators for relying on immunity caselaw for propositions about the state legislative privilege.[448]

Quoting directly from the portion of *Perez* that *Jefferson Community* adopted verbatim,[449] we then reiterated that the "[l]egislative privilege 'must be strictly construed and accepted only to the very limited extent that permitting a refusal to testify or excluding relevant evidence has a public good transcending the normally predominant principle of utilizing all rational means for ascertaining the truth.'"[450] Then, heeding *Jefferson Community*'s signal that *Perez* correctly articulated the legal standards that govern state legislative privilege claims,[451] we followed *Perez*'s lead and adopted *Rodriguez*'s five-factor balancing test.[452]

The Texas Legislators resisted our attempts to follow *Jefferson Community*.[453] They insisted that the Fifth Circuit had no "occasion to explore the scope of the legislative privilege" in *Jefferson Community*,[454] as the panel had concluded that the state legislative privilege couldn't "bar the adjudication of [the plaintiff's] claim" no matter whether "the councilmembers' reasons

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[447] *See id.* (emphases added) (quoting *Jefferson Cmty.*, 849 F.3d at 624).

[448] *See id.* at *4 ("[T]he case law the Legislators lean on—which uniformly addresses immunity, not privilege—is not persuasive.").

See also supra Section II.C.2.a.iii (explaining why it's hazardous to cite state legislative immunity cases for propositions about the state legislative privilege).

[449] *See Jefferson Cmty.*, 849 F.3d at 624 (quoting *Perez*, 2014 WL 106927, at *1).

[450] *See* 2022 WL 2921793, at *2 (quoting *Perez*, 2014 WL 106927, at *1).

[451] *See supra* note 425 and accompanying text.

[452] *See* 2022 WL 2921793, at *4.

[453] *See id.* at *3.

[454] Resp. U.S.'s Mot. Enforce 3d-Party Subpoenas *Duces Tecum*, ECF No. 379, at 14.

for passing the resolutions [were] privileged" as the Parish argued.[455] Thus, the Legislators contended, *Jefferson Community*'s entire discussion of the privilege's scope—including its language describing the privilege as a "qualified" one that must be "strictly construed"—was nonbinding dicta.[456] Predicting that the then-pending appeal in *Hughes* might "clarify the ground rules for legislative privilege in the Fifth Circuit, beyond the [putative] dicta generally describing the nature of the privilege in *Jefferson Community*," the Legislators urged us to hold the United States's motion in abeyance until *Hughes* came down.[457]

We refused.[458] In a passage presaging the conclusions below,[459] we explained that *Jefferson Community*'s pronouncements about the state legislative privilege's narrowness weren't nonbinding dicta, but instead were alternative holdings, which "are binding in this [C]ircuit."[460] Because "[o]ne panel of [the Fifth Circuit] cannot overrule the decision of another panel,"[461] we

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[455] *See Jefferson Cmty.*, 849 F.3d at 624.

[456] *See* Resp. U.S.'s Mot. Enforce 3d-Party Subpoenas *Duces Tecum* at 12, 13 n.6, 14 (quoting *Jefferson Cmty.*, 849 F.3d at 624).

[457] *See* 2022 WL 2921793, at *3; *see also infra* Section II.C.2.f.ii (discussing *Hughes* in depth).

[458] *See* 2022 WL 2921793, at *3.

[459] *See infra* Section III.

[460] *See* 2022 WL 2921793, at *3 (cleaned up) (quoting *Jaco v. Garland*, 24 F.4th 395, 406 n.5 (5th Cir. 2021)).

[461] *See id.* (quoting *Lowrey v. Tex. A&M Univ. Sys.*, 117 F.3d 242, 247 (5th Cir. 1997)).

See also infra Section III (analyzing the "Rule of Orderliness," which forbids one Fifth Circuit panel from overruling another Fifth Circuit panel's published opinion).

reasoned that there was nothing the panel could say in *Hughes* that would contradict *Jefferson Community*—and, thus, no reason for us to leave the United States's motion undecided.[462]

Having satisfied ourselves that we were applying the right legal standard, we weighed the five *Rodriguez* factors and determined that "that the overall balance . . . weigh[ed] in favor of disclosure" of the documents the United States sought.[463] Our analysis essentially mirrored that of the above-cited cases authorizing at least some amount of legislative discovery in redistricting cases.[464]

Our application of the state legislative privilege to the United States's document requests thus comported fully with binding Supreme Court and Fifth Circuit precedent as it then existed.[465] Thus, when the Legislators appealed our document privilege order to the Fifth Circuit,[466] we had no reason to expect anything other than an affirmation similar to that the Fifth Circuit gave us when it confirmed that we had "carefully considered the issue of legislative privilege and neutrally followed the law of this circuit" in our deposition subpoena order.[467]

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[462] *See* 2022 WL 2921793, at *3 (expressing doubt that the *Hughes* panel was "likely to depart from *Jefferson Community*").

But see infra Section II.C.2.f.ii (noting ways in which *Hughes* did in fact depart from *Jefferson Community*).

[463] *See* 2022 WL 2921793, at *4–6.

[464] *See id.*; *see also supra* Section II.C.2.b.ii.

[465] *See supra* Sections II.C.2.a & d.

[466] *See* Notice Appeal, ECF No. 479.

[467] *See LULAC 5th Cir. Op.*, 2022 WL 2713263, at *1 n.2; *see also supra* Section II.C.2.e.ii.

See also LULAC Doc. Subpoena Op., 2022 WL 2921793, at *3 (predicting that the *Hughes* panel was not "likely to depart from *Jefferson Community*").

f. *Hughes*

But things didn't go as expected. The Fifth Circuit stayed our order compelling the Legislators to produce the requested documents,[468] and it held the appeal of that order in abeyance pending its decision in *Hughes*.[469] The *Hughes* panel then adopted an absolutist conception of the state legislative privilege that is difficult to square with *Jefferson Community*'s qualified approach.[470]

i. The District Court's Order

As background, *Hughes* was also a voting rights case (though not a redistricting case).[471] Like the Plaintiffs here, the plaintiffs in *Hughes* challenged a Texas voting law as intentionally discriminatory.[472] Also like the Plaintiffs in our case, the *Hughes* plaintiffs subpoenaed various Texas legislators—who weren't named as defendants and therefore faced no liability risk of their own[473]—for nonpublic documents and communications bearing on whether the Legislature

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[468] Order at 11, *League of United Latin Am. Citizens v. Abbott (Patrick)*, No. 22-50662 (5th Cir. July 27, 2022), ECF No. 30-2.

[469] Order at 11, *League of United Latin Am. Citizens v. Abbott (Patrick)*, No. 22-50662 (5th Cir. Sept. 15, 2022), ECF No. 77-2.

[470] *See* 68 F.4th at 231–40; *see also infra* Section II.C.2.f.ii.

[471] *See Hughes Dist. Ct. Op.*, 2022 WL 1667687, at *1 ("This action arises out of an omnibus voting bill, Senate Bill 1 ('S.B. 1'), [that] the State of Texas enacted on August 31, 2021."); *see also Hughes 5th Cir. Op.*, 68 F.4th at 231–32 (explaining that S.B. 1 "relates to voter registration, voting by mail, poll watchers, and other aspects of election integrity and security").

[472] *See Hughes Dist. Ct. Op.*, 2022 WL 1667687, at *1 ("Plaintiffs claim, *inter alia*, that the Texas Legislature enacted S.B. 1 with the intent to discriminate against certain racial minorities . . . .").

[473] *See Hughes 5th Cir. Op.*, 68 F.4th at 232 (identifying the legislators as "non-part[ies]").

passed the law for discriminatory reasons.[474] The legislators resisted those subpoenas on legislative privilege grounds.[475]

The District Court ordered the legislators to produce most of the documents that the *Hughes* plaintiffs demanded.[476] Its analysis was very similar to that which our panel employed in our documentary discovery opinion discussed above.[477] Citing *Gillock* and *Jefferson Community*, the District Court first emphasized that "the privilege accorded to state legislators is qualified."[478] Quoting verbatim from *Jefferson Community* (and thereby echoing *Trammel*), the District Court then restated that the state legislative privilege "must be strictly construed and accepted only to the very limited extent that permitting a refusal to testify or excluding relevant evidence has a public good transcending the normally predominant principle of utilizing all rational means for ascertaining the truth."[479] Then, in accordance with *Jefferson Community*'s implicit signal that *Rodriguez*'s balancing framework provides the appropriate legal standard for evaluating state legislative privilege claims,[480] the District Court adopted and applied

[474] *See Hughes Dist. Ct. Op.*, 2022 WL 1667687, at *1 ("Plaintiffs served third-party subpoenas to the legislative sponsors of S.B. 1 . . . [seeking] documents and communications from the State Legislators concerning claims of criminal conduct in Texas elections, the anticipated effects of S.B. 1, and communications with third-party organizations concerning S.B. 1.").

[475] *See id.* at *1–8.

[476] *See id.* at *8.

[477] *Compare id.* at *2–7, *with LULAC Doc. Subpoena Op.*, 2022 WL 2921793, at *2–6. *See also supra* Section II.C.2.e.iii.

[478] *See Hughes Dist. Ct. Op.*, 2022 WL 1667687, at *2 (first citing *Gillock*, 445 U.S. at 373; then citing *Jefferson Cmty.*, 849 F.3d at 624).

[479] *See id.* (citing *Jefferson Cmty.*, 849 F.3d at 624).

[480] *See supra* note 425 and accompanying text.

Rodriguez's five-factor test.[481] After balancing those factors, the District Court concluded that the "important federal interest[]" in "protecting the fundamental right to vote . . . outweigh[ed] any chill to the legislature's deliberations" that the requested discovery might inflict.[482] Accordingly, the court ruled that the legislative privilege yielded to the plaintiffs' document requests.[483]

To support their contrary argument that the state legislative privilege foreclosed the requested discovery, the legislators "rel[ied] on numerous authorities construing the *federal* Constitution's Speech [or] Debate Clause and *federal* legislative *immunity*."[484] But because—as discussed above[485]—"the Supreme Court has made it clear that the Speech [or] Debate Clause does not apply to state legislators," the District Court correctly concluded that cases involving federal rather than state legislators were "unpersuasive in this context."[486]

ii. The Fifth Circuit Panel's Opinion

Even though the District Court's order in *Hughes* scrupulously followed binding Supreme Court and Fifth Circuit precedent as it then existed,[487] a panel of the Fifth Circuit nonetheless reversed it.[488] Relying heavily on state legislative *immunity* cases like *Tenney* and *Bogan* and

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[481] *See Hughes Dist. Ct. Op.*, 2022 WL 1667687, at *2–7 (citing *Rodriguez*, 280 F. Supp. 2d at 101).

[482] *See id.* at *7.

[483] *See id.*

[484] *See id.* at *3–4, *5 n.4 (emphases added) (listing various Speech or Debate Clause cases that the legislators in *Hughes* urged the District Court to follow).

[485] *See supra* notes 102–103 and accompanying text.

[486] *See Hughes Dist. Ct. Op.*, 2022 WL 1667687, at *3 (citing *Gillock*, 445 U.S. at 374).

[487] *See supra* Section II.C.2.a.

[488] *See Hughes 5th Cir. Op.*, 68 F.4th at 231, 240.

federal legislative privilege cases like *Helstoski* and *Gravel*,[489] the *Hughes* panel declared that the state legislative privilege forbids courts from "facilitat[ing] an expedition seeking to uncover a legislator's subjective intent in drafting, supporting, or opposing proposed or enacted legislation."[490] Because the *Hughes* plaintiffs were seeking "documents concerning the legislative process and [the] subjective thoughts and motives" underlying the challenged voting law, the panel concluded that the state legislative privilege barred the requested discovery.[491]

The panel also determined that *Hughes* wasn't "one of those 'extraordinary instances' in which the legislative privilege must 'yield'" under *Arlington Heights* and *Gillock*.[492] Even though the panel recognized that "constitutional rights [we]re at stake," it nonetheless concluded that the federal interests at issue in *Hughes* weren't "important" enough to overcome the privilege.[493] The panel reasoned that there was also "an 'important federal interest' at stake" in *Tenney*—namely, "the vindication of civil rights"[494]—and yet the *Tenney* Court ruled that state

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[489] *See id.* at 235–40 & nn. 39–40, 48, 50–52, 60–72.

See also supra Section II.C.1 (discussing *Tenney* and *Bogan*); Section II.B.2 (discussing *Helstoski* and *Gravel*).

[490] *Hughes 5th Cir. Op.*, 68 F.4th at 238.

[491] *See id.* at 240.

[492] *See id.* at 237 (cleaned up) (first quoting *Arlington Heights S. Ct. Op.*, 429 U.S. at 268; then quoting *Gillock*, 445 U.S. at 373).

See also supra Section II.C.2.a.i (discussing *Arlington Heights*); Section II.C.2.a.iii (discussing *Gillock*).

[493] *See Hughes 5th Cir. Op.*, 68 F.4th at 238.

[494] *See id.* at 239 (cleaned up).

See also Tenney, 341 U.S. at 371 (recounting that the plaintiff in *Tenney* had alleged that the defendant legislators had "prevent[ed] him from effectively exercising his constitutional rights").

legislative immunity "did not yield to those interests."[495] "By the same token," the panel reasoned, the state legislative *privilege* likewise "preclude[d] the compelled discovery of *documents* pertaining to the state legislative process that" the plaintiffs sought in *Hughes*.[496]

Nor, in the panel's view, did the fact that the plaintiffs in *Hughes* were raising "allegations involving racial animus" make the case "extraordinary."[497] The *Hughes* panel reasoned that the plaintiff in *Bogan* had also alleged that the defendants had acted "out of racial animus," and yet the Supreme Court nevertheless held that the defendants "were absolutely immune from" the plaintiff's suit.[498]

Nor, the panel concluded, did the fact that the plaintiffs were specifically accusing the Texas Legislature of passing a racially discriminatory *voting* law make the case "extraordinary."[499] The panel noted that the plaintiffs in *Lee* had also raised "serious allegations" that unlawful racial considerations were "the overriding motivation behind" a voting law, and yet the Ninth Circuit nevertheless "held that the legislative privilege applied."[500]

Although the *Hughes* panel was required to follow the Fifth Circuit's prior published opinion in *Jefferson Community*,[501] *Hughes* is difficult to square with *Jefferson Community* in several respects. For instance, whereas *Jefferson Community* says that the state legislative

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[495] *See Hughes 5th Cir. Op.*, 68 F.4th at 239.

[496] *See id.* at 239–40 (emphases added).

[497] *See id.* at 238.

[498] *See id.* at 238–39 (cleaned up) (quoting *Bogan*, 523 U.S. at 47).

[499] *See id.* at 239 (citing *Lee*, 908 F.3d at 1183, 1187–88).

[500] *See id.* (cleaned up) (quoting *Lee*, 908 F.3d at 1183, 1188); *see also supra* Section II.C.2.c (analyzing *Lee* in depth).

[501] *See infra* Section III (discussing the "Rule of Orderliness," which requires Fifth Circuit panels to follow published opinions issued by earlier Fifth Circuit panels).

privilege "must be *strictly construed* and accepted only to [a] *very limited extent*,"[502] *Hughes* says "that the legislative privilege's scope is necessarily *broad*."[503] Likewise, even though *Jefferson Community* necessarily rejected the Parish's argument that the "legislative privilege . . . foreclose[s] [any] inquiry into [legislators'] motivations and thought processes,"[504] *Hughes* nevertheless holds "that state legislators can[not] be compelled to produce documents concerning the legislative process and a legislator's thoughts and motives."[505]

To be fair, *Hughes* did at least acknowledge and quote *Jefferson Community*'s language stating that "the legislative privilege is 'qualified.'"[506] However, its quotation from *Jefferson Community* omitted crucial language from the opinion. Here's a side-by-side comparison of the relevant passages from both opinions, with the critical differences highlighted in bold:

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[502] *See Jefferson Cmty.*, 849 F.3d at 624 (emphases added) (quoting *Perez*, 2014 WL 106927, at *1).

[503] *See Hughes 5th Cir. Op.*, 68 F.4th at 236.

[504] *Compare Jefferson Cmty. Appellants' Br.* at 33 (making that argument), *with Jefferson Cmty.*, 849 F.3d at 624 (adopting a much narrower conception of the state legislative privilege).

See also infra Section III.C (further developing the argument that *Jefferson Community* necessarily rejected the Parish's argument that the state legislative privilege categorically forecloses inquiries into legislative motive and intent).

[505] *See Hughes 5th Cir. Op.*, 68 F.4th at 240.

[506] *See id.* at 236 (quoting *Jefferson Cmty.*, 849 F.3d at 624).

Jefferson Community	***Hughes***
"This privilege 'must be ***strictly construed*** and accepted ***only to the very limited extent*** that ***permitting a refusal*** to testify or excluding relevant evidence has a public good transcending the normally predominant principle of utilizing all rational means for ascertaining the truth.'"[507]	"[T]he legislative privilege is 'qualified' by ***exceptions*** that serve 'the normally predominant principle of utilizing all rational means for ascertaining the truth.'"[508]

Hughes's quotation to *Jefferson Community* thus excludes *Jefferson Community*'s "strictly construed" and "very limited extent" language entirely.[509] *Hughes* also reverses the quoted sentence's thrust: whereas *Jefferson Community* suggests that the state legislative privilege shields evidence *only when* some countervailing "public good" justifies *withholding* that evidence, *Hughes* creates the opposite impression that *Jefferson Community* said that the privilege *shields* evidence unless some *exception* justifies *disclosing* that evidence.[510]

Hughes does also acknowledge and quote the portion of *Jefferson Community* stating that whereas "the common-law legislative immunity for state legislators is absolute, the legislative privilege for state lawmakers is, at beast, one which is qualified."[511] *Hughes* nevertheless concludes, however, that that language "provides no support for the idea that state legislators can be compelled to produce documents concerning the legislative process and a legislator's

[507] *Jefferson Cmty.*, 849 F.3d at 624 (quoting *Perez*, 2014 WL 106927, at *1).

[508] *See Hughes 5th Cir. Op.*, 68 F.4th at 236 (quoting *Jefferson Cmty.*, 849 F.3d at 624).

[509] *See id.* (quoting *Jefferson Cmty.*, 849 F.3d at 624).

[510] *Compare Jefferson Cmty.*, 849 F.3d at 624 (quoting *Perez*, 2014 WL 106927, at *1), *with Hughes 5th Cir. Op.*, 68 F.4th at 236 (quoting *Jefferson Cmty.*, 849 F.3d at 624).

[511] *See Hughes 5th Cir. Op.*, 68 F.4th at 240 (quoting *Jefferson Cmty.*, 849 F.3d at 624).

subjective thoughts and motives."[512] That is so, the *Hughes* panel reasoned, because the legislators in *Jefferson Community* were specifically trying to use the privilege to "*bar the adjudication* of" the plaintiff's "claim for injunctive relief."[513] Thus, the *Hughes* court concluded, *Jefferson Community* "held only that a claim for injunctive relief could proceed"—it "says nothing about cases" in which a litigant subpoenas a state legislator for documents evidencing the legislature's intent.[514]

The problem with that conclusion, however, is that *Jefferson Community*'s statement that the state legislative "privilege cannot bar the adjudication of a claim" isn't the case's only binding holding.[515] As discussed at length below,[516] *Jefferson Community*'s more general pronouncements that the state legislative privilege is "qualified," "strictly construed," and "very limited" are also binding holdings that the *Hughes* court was bound to follow.[517] *Hughes*'s attempt to limit *Jefferson Community* to its specific facts therefore can't rob *Jefferson*

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[512] *See id.* (emphases added) (quoting *Jefferson Cmty.*, 68 F.4th at 624).

[513] *See id.* (emphasis added) (quoting *Jefferson Cmty.*, 68 F.4th at 624).

See also Jefferson Cmty. Appellants' Br. at 33 ("[L]egislative privilege . . . foreclose[s] [any] inquiry into the councilmembers' motivations and thought processes, and therefore preclude any claim based on those facets of the legislative process. [The plaintiff]'s putative claim . . . seeking injunctive relief against the Parish based on . . . the Parish Council's reasons for enacting the resolutions is [therefore] so devoid of merit that it fails to present a federal question . . . . Accordingly, the District Court lacked jurisdiction over [Plaintiff's] claim.").

[514] 68 F.4th at 240.

[515] *See Jefferson Cmty.*, 68 F.4th at 624.

[516] *See infra* Section III.D.

[517] *See Jefferson Cmty.*, 68 F.4th at 624 (quoting *Perez*, 2014 WL 106927, at *1–2).

Community's more general pronouncements about the state legislative privilege's narrowness of their precedential force.[518]

Hughes further misapplied applicable precedent by relying heavily on state legislative *immunity* and *federal* legislative privilege precedents to support propositions about the *state* legislative *privilege*[519]—even as the court explicitly acknowledged that the three doctrines aren't coextensive.[520] The court first reasoned that it was permissible to rely on *federal* legislative *privilege* cases because "the legislative privilege that protects state lawmakers 'is similar in origin and rationale to that accorded Congressmen under the Speech or Debate Clause.'"[521] That "similar in origin and rationale" language comes from the U.S. Supreme Court's opinion in *Supreme Court of Virginia*,[522] a state legislative *immunity* opinion cited at various points throughout this dissent.[523]

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[518] *See infra* Section III.D–E.

[519] *See Hughes 5th Cir. Op.*, 68 F.4th at 237 (liberally "drawing on caselaw involving . . . the Constitution's Speech or Debate Clause or legislative immunity . . . even though [*Hughes*] involve[d] a privilege from disclosure rather than an immunity from suit or liability").

But see supra Section II.C.2.a.iii (emphasizing the differences between state legislative privilege on one hand and federal legislative privilege and state legislative immunity on the other, and explaining why it's hazardous to rely on precedents involving the latter in cases involving the former).

[520] *See Hughes 5th Cir. Op.*, 68 F.4th at 237 (recognizing that "the privilege for state lawmakers has more exceptions" than its federal analogue); *id.* (drawing "on caselaw involving . . . legislative immunity (rather than legislative privilege)" despite recognizing that "the parallel between [the two doctrines] may not run to the horizon").

[521] *See id.* (quoting *Supreme Court of Virginia*, 446 U.S. at 732).

[522] *See id.* (emphasis added) (quoting *Supreme Court of Virginia*, 446 U.S. at 732).

[523] *See Supreme Court of Virginia*, 446 U.S. at 721 ("This case raises questions of whether [certain state actors] are officially *immune from suit* . . . ." (emphasis added)); *see also supra* notes 55, 57, 104–105, 268, 378, and accompanying text.

Here too, however, *Hughes*'s quotation from *Supreme Court of Virginia* omitted critical language from the Supreme Court's opinion. Here are the relevant sentences from *Supreme Court of Virginia* and *Hughes* side by side, with the critical differences again highlighted in bold:

Supreme Court of Virginia	***Hughes***
"We have also recognized that state legislators enjoy common-law ***immunity from liability*** for their legislative acts, an ***immunity*** that is similar in origin and rationale to that accorded Congressmen under the Speech or Debate Clause."[524]	"[T]he legislative ***privilege*** that protects state lawmakers 'is similar in origin and rationale to that accorded Congressmen under the Speech or Debate Clause.'"[525]

By omitting the word "immunity" from that quotation and replacing it with "privilege," *Hughes* creates the misimpression that *Supreme Court of Virginia* said that federal and state legislative *privilege* are "similar in origin and rationale."[526]

If anything, though, *Supreme Court of Virginia* says the opposite. In a portion of *Supreme Court of Virginia* that *Hughes* doesn't acknowledge,[527] the Supreme Court stated that even though it has "equated the legislative *immunity* to which state legislators are entitled . . . to that accorded Congressmen under the Constitution," "[t]he separation-of-powers doctrine justifies a broader *privilege* for Congressmen than for state legislators" (at least "in criminal

[524] *Supreme Court of Virginia*, 446 U.S. at 732 (emphases added).

[525] *See Hughes 5th Cir. Op.*, 68 F.4th at 237 (emphasis added) (quoting *Supreme Court of Virginia*, 446 U.S. at 732).

[526] *See id.* ("The legislative *privilege* that protects state lawmakers 'is similar in origin and rationale to that accorded Congressmen under the Speech or Debate Clause.'" (emphasis added) (quoting *Supreme Court of Virginia*, 446 U.S. at 732)).

[527] *See id.* at 237 & n.49.

actions").[528] *Supreme Court of Virginia* therefore doesn't support *Hughes*'s conclusion that it's permissible to "draw[] on caselaw involving . . . the Constitution's Speech or Debate Clause" when determining the state legislative privilege's scope.[529]

Hughes's conclusion that it's appropriate to "draw[] on caselaw involving . . . legislative *immunity*" to determine the state legislative *privilege*'s scope was likewise flawed.[530] The *Hughes* panel asserted that it could rely on immunity caselaw because "the Supreme Court has often analyzed" immunity and privilege issues "in parallel."[531] "Both concepts," the panel reasoned, "involve the core question whether a lawmaker may 'be made to answer—either in terms of questions *or* in terms of defending from prosecution.'"[532]

The *Hughes* panel provided only one example of the Supreme Court analyzing immunity and privilege issues "in parallel":[533] the aforementioned passage of *Gravel v. United States* remarking that a federal legislator could "not be made to answer—*either* in terms of *questions* or in terms of *defending himself from prosecution*—for . . . events that occurred at [a] subcommittee meeting."[534] The reason why that passage analyzes immunity and privilege "in parallel," however, was because *Gravel* was a *federal* legislative privilege case under the *Speech or Debate*

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[528] *See Supreme Court of Virginia*, 446 U.S. at 733 (emphases added) (citing *Gillock*, 445 U.S. 360).

[529] *Contra Hughes 5th Cir. Op.*, 68 F.4th at 237 & n.49.

[530] *Contra id.* at 237.

[531] *Hughes 5th Cir. Op.*, 68 F.4th at 237 (cleaned up) (emphases added) (citing *Gravel*, 408 U.S. at 616).

[532] *Id.* (cleaned up) (quoting *Gravel*, 408 U.S. at 616).

[533] *See id.* at 237 & nn.51–52 (cleaned up) (citing *Gravel*, 408 U.S. at 616).

[534] *See Gravel*, 408 U.S. at 616 (emphases added); *see also supra* notes 99–100 and accompanying text (discussing that passage).

Clause[535]—which, as discussed, gives federal legislators an "absolute" immunity and an "absolute" privilege alike.[536] In other words, the Supreme Court discussed privilege and immunity "in parallel" in *Gravel* because there was no reason for the Court to differentiate between them; the federal legislative privilege and federal legislative immunity are effectively coterminous.

Again, though, the Supreme Court has squarely held that the Speech or Debate Clause applies to *federal legislators only*—it *doesn't* apply to *state* legislators.[537] Moreover, *Gillock* demonstrates that the Speech or Debate Clause protects evidence that the common-law state legislative privilege does not.[538] Thus, the fact that *Gravel* analyzed *federal* immunity and privilege "in parallel" doesn't mean that courts should do the same with *state* immunity and privilege.[539] If anything, the opposite is true.[540]

Proceeding from the mistaken premise that courts may freely transplant state legislative *immunity* principles into the state legislative *privilege* context, *Hughes* adopted a version of *Arlington Heights* and *Gillock*'s "extraordinary instances"/"important federal interests" exception

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[535] *See Gravel*, 408 U.S. at 609.

[536] *See, e.g.*, *Sealed Case*, 80 F.4th at 365 ("If a [federal legislator's] act qualifies as legislative under *Gravel*, the privilege applies and the Clause confers three 'absolute' protections. First, the privilege includes immunity from suit . . . . Second, the privilege includes an evidentiary privilege . . . . Third, the privilege encompasses a testimonial privilege . . . ." (citations omitted)); *see also supra* Section II.B.

[537] *E.g.*, *Lake Country Estates*, 440 U.S. at 404 ("The Speech or Debate Clause of the United States Constitution is no more applicable to the members of state legislatures than to the members of [a regional decisionmaking body]."); *see also supra* notes 102–103 and accompanying text.

[538] *See Gillock*, 445 U.S. at 366 ("It is clear that were we to recognize an evidentiary privilege similar in scope to the Federal Speech or Debate Clause, much of the evidence at issue here would be inadmissible."); *see also supra* Section II.C.2.a.iii.

[539] *Contra Hughes 5th Cir. Op.*, 68 F.4th at 237.

[540] *See supra* Section II.C.2.a.iii.

that is so narrow that, practically speaking, no civil case could ever satisfy it. The *Hughes* panel concluded that the Supreme Court's state legislative *immunity* rulings in *Tenney* and *Bogan* indicate that the state legislative *privilege* also forbids litigants from obtaining evidence bearing on legislators' "subjective intent in drafting, supporting, or opposing proposed or enacted legislation"—even when that intent is the central question in the case.[541] Based largely on *Tenney*'s statement that it's "not consonant with our scheme of government for a court to inquire into the motives of legislators," *Hughes* suggests that any "court proceeding that probes legislators' subjective intent in the legislative process" poses "a 'deterrent to the uninhibited discharge of their legislative duty'" that courts should eliminate.[542]

But *Tenney* and *Bogan*'s proclamations that litigants can't hold state legislators *liable* based on their subjective motives can't possibly mean that courts may never scrutinize the motivations underlying state legislation *at all*, or that litigants may never *obtain evidence* from legislators that bears on those motivations.[543] After all, if the state legislative privilege categorically forbade courts from "prob[ing] legislators' subjective intent in the legislative process" as *Hughes* seems to imply,[544] the Supreme Court wouldn't have reaffirmed in *Arlington Heights* that "[p]roof of racially discriminatory intent or purpose" is in fact "*required* to show a

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[541] *See* 68 F.4th at 238 (quoting *Tenney*, 341 U.S. at 374, 377); *see also id.* at 238–39 (citing *Bogan*, 523 U.S. at 47–49, 53, for the proposition that "[e]ven for allegations involving racial animus . . . the Supreme Court has held that the legislative privilege stands fast").

[542] *See id.* at 238 (quoting *Tenney*, 341 U.S. at 377).

[543] *See, e.g.*, *Pernell*, 84 F.4th at 1353 (Jill Pryor, J., dissenting) ("Although as a general matter it is 'not consonant with our scheme of government for a court to inquire into the motives of legislators,' such an inquiry is exactly what a disparate impact claim requires." (quoting *Tenney*, 341 U.S. at 377)); *id.* at 1357 n.14 (criticizing *Hughes* for resting "on the flawed premise that because state legislators hold *immunity* from *liability* . . . under *Tenney*, they must also hold an absolute *privilege* against *third party discovery*" (emphases added)).

[544] *See* 68 F.4th at 238.

violation of the Equal Protection Clause."[545] Nor would *Arlington Heights* have explicitly stated that—notwithstanding the state legislative privilege—legislators might nonetheless "be called to the stand at trial to testify concerning the purpose of the official action" in at least some intentional racial discrimination cases.[546] And if state legislators may never "be compelled to produce documents concerning the legislative process and a legislator's subjective thoughts and motives" as *Hughes* suggests,[547] *Arlington Heights* wouldn't have stated that "contemporary statements by members of the decisionmaking body, minutes of its meetings, or reports" are in fact "subjects of proper inquiry in determining whether racially discriminatory intent existed."[548] Yet *Hughes* doesn't analyze those aspects of *Arlington Heights* (beyond merely restating *Arlington Heights*'s holding that the state legislative privilege yields in "extraordinary instances").[549]

Supreme Court precedent therefore belies *Hughes*'s assertion that "the legislative *privilege* stands fast" even in cases involving "allegations [of] racial animus."[550] Read together, *Tenney*, *Bogan*, and *Arlington Heights* establish that it's legislative *immunity* that "stands fast" when a plaintiff accuses a State of intentional racial discrimination—*not* legislative *privilege*.[551]

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[545] *See Arlington Heights S. Ct. Op.*, 429 U.S. at 265 (emphasis added); *see also supra* Section II.C.2.a.i.

[546] *See Arlington Heights S. Ct. Op.*, 429 U.S. at 268 (emphasis added).

[547] *Contra* 68 F.4th at 240.

[548] *See Arlington Heights S. Ct. Op.*, 429 U.S. at 268 (emphasis added).

[549] *See Hughes 5th Cir. Op.*, 68 F.4th at 237–38 & nn.53 & 59 (quoting *Arlington Heights S. Ct. Op.*, 429 U.S. at 268).

[550] *Contra id.* at 238 (emphasis added).

[551] *See supra* Sections II.C.1 and II.C.2.a.i.

After all, were *Hughes* correct that the state legislative privilege categorically prohibits litigants from "seeking to uncover a legislator's subjective intent in drafting, supporting, or opposing proposed or enacted legislation,"[552] it's unclear how any plaintiff could ever obtain the requisite evidence to prove intentional racial discrimination in the redistricting context.[553] As discussed, the Texas Legislature's "subjective intent in drafting [and] supporting" the challenged electoral maps is the core factual question that our panel must answer in this case.[554]

Yet *Hughes* implies that the state legislative privilege in fact *bars* litigants from obtaining such evidence. As noted, *Hughes* cited *Lee* as an example of a case that, in the panel's view, correctly applied the state legislative privilege to bar discovery.[555] And, to reiterate, the Ninth Circuit barred the *Lee* plaintiffs "from questioning [local lawmakers] regarding any legislative acts, motivations, or deliberations pertaining to the . . . redistricting ordinance" they were challenging.[556] *Hughes*'s favorable citation to *Lee* thereby suggests that the panel believed "that the legislative privilege stands fast" in redistricting cases.[557]

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[552] *Contra Hughes 5th Cir. Op.*, 68 F.4th at 238.

[553] *Cf. Pernell*, 84 F.4th at 1354 n.12 (Jill Pryor, J., dissenting) (noting in a different but analogous context that barring "documentary discovery against [state] legislators" may leave "no other route . . . available" for plaintiffs raising intentional discrimination challenges "to discover evidence to test their claims").

[554] *See supra* Section I.

[555] *See* 68 F.4th at 239 (citing *Lee*, 908 F.3d at 1183, 1187–88).

[556] *See Lee*, 908 F.3d at 1181, 1188.

[557] *See* 68 F.4th at 238–39 (citing *Lee*, 908 F.3d at 1183, 1187–88).

See also Majority Op., 2023 WL 8880313, at *7–9 (agreeing that *Lee* establishes that "claims of racial gerrymandering brought by private plaintiffs" don't qualify for *Arlington Heights*'s "extraordinary civil cases" exception, and concluding that *Hughes* likewise implies that redistricting claims brought by the United States aren't "extraordinary" either); *Miss. State Conf. of the NAACP v. State Bd. of Election Comm'rs*, No. 3:22-cv-734, 2023 WL 8360075, at *4 (S.D. Miss. Dec. 1, 2023) (post-*Hughes* redistricting

If, as *Hughes* and *Lee* suggest, cases in which a plaintiff claims that a state purposefully redesigned its electoral system to rob racial minorities of their voting power aren't "extraordinary,"[558] it's hard to imagine civil case *would* qualify.[559] *Hughes* offers no examples of civil cases that are sufficiently "extraordinary" to overcome the privilege.[560] Nor does *Hughes*

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case reading *Hughes* to "indicate[] that a challenge to election laws under the Constitution and the [VRA] does not rise to th[e] level" of an "extraordinary" civil case in which the state legislative privilege yields).

[558] *See Hughes 5th Cir. Op.*, 68 F.4th at 239; *Lee*, 908 F.3d at 1187–88.

To be sure, some courts have interpreted *Lee* more narrowly. One court, for example, reads *Lee* not to "hold that a gerrymandering claim can *never* overcome legislative privilege," but instead to hold that the *Lee* plaintiffs *failed to assemble a sufficient "factual record"* that would "justify[] the substantial intrusion into the legislative process" that their requested discovery would have created. *See Whitford*, 331 F.R.D. at 378 (emphases added) (quoting *Lee*, 908 F.3d at 1188).

In fact, the Fifth Circuit appeared to espouse that narrower interpretation of *Lee* in its unpublished (and therefore non-binding) opinion denying a stay in the instant case. *See LULAC 5th Cir. Op.*, 2022 WL 2713263, at *1 n.2 (emphasis added) (suggesting that *Lee* merely "rejected [the] plaintiffs' request for a 'categorical exception' to the privilege" that would apply whenever a litigant asserts a constitutional claim that directly implicates a state's legislature's intent, and that *Lee* specifically "bas[ed] its holding on th[e] case's 'factual record'" (quoting *Lee*, 908 F.3d at 1188)); *see also* Section II.C.2.e.ii.

Hughes, however, implicitly rejects that narrower reading of *Lee*. *See* 68 F.4th at 239 (citing *Lee*, 908 F.3d at 1183, 1187–88). Nothing in *Hughes* suggests that *Lee* would have come out differently if the plaintiffs had merely assembled a stronger factual record. *See id.* (citing *Lee*, 908 F.3d at 1183, 1187–88). To the contrary, *Hughes* reads *Lee* to hold that "the legislative privilege stands fast" even when a litigant "contend[s] that race was . . . the overriding motivation behind the redrawing of a [jurisdiction's] voting district boundaries." *See id.* at 238–39 (cleaned up) (quoting *Lee*, 908 F.3d at 1183, 1188).

[559] *See, e.g.*, *Bethune-Hill*, 114 F. Supp. 3d at 337 (opining that redistricting cases are exactly the sort of "extraordinary instance" contemplated by *Arlington Heights* because "the natural corrective mechanisms built into our republican system of government offer little check upon the very real threat of 'legislative self-entrenchment'" (quoting Asta, *supra* note 299, at 264)).

Cf. In re Landry, 83 F.4th 300, 307 (5th Cir. 2023) (remarking in a different context that "[r]edistricting litigation . . . is not ordinary litigation").

See also U.S.'s Suppl. Opening Br., ECF No. 722, at 11 ("'Extraordinary civil cases' cannot be an empty category; if any civil case is extraordinary, it is this one." (cleaned up)); U.S.'s Suppl. Reply Br., ECF No. 734, at 6 ("If this case is not extraordinary, no civil case could ever be under the Legislators' logic.").

[560] *See Hughes 5th Cir. Op.*, 68 F.4th at 237–40.

offer lower courts any concrete guidance regarding how to evaluate whether any particular civil case qualifies as "extraordinary."[561]

Hughes's favorable citation to *Lee* as an example of a case in which the state legislative privilege shouldn't yield is also confounding for an additional reason: it sends mixed signals when considered alongside *Jefferson Community*. As discussed, *Jefferson Community* adopted several holdings from *another* redistricting case—specifically, *Perez*—as the Fifth Circuit's own.[562] The *Jefferson Community* panel presumably wouldn't have given *Perez* its imprimatur if it thought that *Perez* had applied the wrong legal standard or reached the wrong result. *Jefferson Community* thereby signals that courts in this Circuit should follow *Perez*—and, by extension, its adoption of *Rodriguez*'s five-factor balancing framework—when adjudicating state legislative privilege claims in redistricting cases.[563]

But whereas *Perez* holds that courts considering whether to let plaintiffs in redistricting cases depose state legislators should balance the serious federal interests at stake against the countervailing interest in promoting legislative independence,[564] *Lee* suggests that legislative

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[561] *See id.* at 239 (suggesting merely that, to qualify as "extraordinary," a civil case must be "closer on the continuum of legislative immunity and privilege" to "the criminal prosecution under federal law at issue in *Gillock*" than "the suits . . . at issue in *Tenney* and *Bogan*").

See also Majority Op., 2023 WL 8880313, at *7 (remarking that although *Hughes* "provides examples of what an extraordinary civil case is *not*," it tells us "much less about" what *does* count "as an extraordinary civil case" (emphasis added)).

[562] *See Jefferson Cmty.*, 849 F.3d at 624 (citing *Perez*, 2014 WL 106927, at *1–2).

[563] *See Bryant*, 2017 WL 6520967, at *6 (noting that *Jefferson Community* identified *Perez* "as providing the relevant analysis and law"); *id.* at *7 (inferring from the fact that *Jefferson Community* "favorably cited and quoted from *Perez* with regard to the qualified nature of the [state legislative] privilege in general" that the Fifth Circuit implicitly approved *Perez*'s other legal conclusions); *id.* at *8 ("[T]he Fifth Circuit cited *Rodriguez* favorably in *Jefferson*, and, thus, found *Rodriguez* to be good law."); *see also supra* note 425 and accompanying text.

[564] *See Perez*, 2014 WL 106927, at *2 ("To determine whether the legislative privilege precludes disclosure, a court must balance the interests of the party seeking the evidence against the interests of the

independence concerns *always* trump the federal interests at stake in redistricting cases.[565] Because two different Fifth Circuit panels have issued published, precedential opinions approving contradictory aspects of those two seemingly irreconcilable authorities, it's unclear which of those cases the Fifth Circuit wants lower courts to consult for guidance when deciding legislative privilege issues in redistricting cases.

Finally, even though *Hughes* expressly recognizes that the state legislative privilege "is an evidentiary privilege governed by federal common law, as applied through Rule 501 of the Federal Rules of Evidence,"[566] *Hughes* doesn't obey (or even mention) Rule 501's command to apply evidentiary privileges (including the state legislative privilege) the way they've been "interpreted by United States courts in the light of reason and experience."[567] As discussed, most United States courts applying the state legislative privilege "in the light of reason and experience" have adopted *Rodriguez*'s five-factor balancing test.[568] So, to the extent that *Hughes*

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individual claiming the privilege. The court in *Rodriguez* identified five factors to aid in this determination . . . ." (citations omitted)).

[565] *See Lee*, 908 F.3d at 1188 ("We recognize that claims of racial gerrymandering involve serious allegations . . . . But the factual record in this case falls short of justifying the substantial intrusion into the legislative process. . . . *Arlington Heights* itself also involved an equal protection claim alleging racial discrimination—putting the government's intent directly at issue—but nonetheless suggested that such a claim was not, in and of itself, within the subset of 'extraordinary instances' that might justify an exception to the privilege. Without sufficient grounds to distinguish those circumstances from the case at hand, we conclude that the district court properly denied discovery on the ground of legislative privilege." (cleaned up)).

[566] *See Hughes 5th Cir. Op.*, 68 F.4th at 235 (cleaned up) (quoting *Jefferson Cmty.*, 68 F.4th at 624).

[567] *Compare* FED. R. EVID. 501, *with Hughes 5th Cir. Op.*, 68 F.4th at 235–40. *See also supra* notes 102–103 and accompanying text.

[568] *See supra* Section II.C.2.b.i–iii.

doesn't follow the substantial weight of authority adopting that balancing test,[569] *Hughes* contravenes Rule 501.[570]

III. *Jefferson Community*, *Hughes*, and the Rule of Orderliness

Shortly after the Fifth Circuit released *Hughes*, it vacated our order overruling the Texas Legislators' objections to the United States's document subpoenas and remanded with instructions to reconsider those objections in light of *Hughes*.[571] That is the task our panel must now perform.

I of course don't believe that my respectful disagreement with *Hughes* gives this Court any license to disregard it. Judges in this Circuit must follow published Fifth Circuit opinions as faithfully as possible—even ones with which they disagree.[572] Thus, if *Hughes* were the only binding precedent on point, I'd set aside my reservations and follow *Hughes* unhesitatingly.

But *Hughes* isn't the only published Fifth Circuit case on point. *Jefferson Community* is also a precedential Fifth Circuit decision that this panel must follow as faithfully as possible.[573]

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[569] *See Hughes 5th Cir. Op.*, 68 F.4th at 235–40.

See also Miss. State Conf., 2023 WL 8360075, at *3–4 (inferring from the fact that *Hughes* "made no reference to the *Rodriguez* analysis" that *Hughes* "implicitly rejected" *Rodriguez*'s five-factor balancing test).

[570] *See, e.g.*, *Pernell*, 84 F.4th at 1355 (Jill Pryor, J., dissenting) (opining that using "the same balancing test to evaluate claims of legislative privilege" that "district courts in numerous other cases" have adopted is most "consistent with Rule 501's command to interpret privileges in light of judicial experience"); *see also supra* notes 328–329 and accompanying text.

[571] *See LULAC Remand Order*, 2023 WL 4697109, at *1.

[572] *See, e.g.*, *Garcia v. Limon*, No. 1:19-cv-120, 2019 WL 7494398, at *5 (S.D. Tex. Nov. 4, 2019) ("Under the rule of orderliness, when the Fifth Circuit issues a decision which directly resolves a legal question, district courts 'may not overrule the decision, right or wrong.'" (quoting *Lyda Swinerton Builders, Inc. v. Okla. Sur. Co.*, 903 F.3d 435, 455 (5th Cir. 2018))), *report and recommendation accepted by* 2020 WL 76248 (S.D. Tex. Jan. 7, 2020).

[573] *See Jefferson Cmty.*, 849 F.3d at 619.

That presents our panel with a conundrum. How can we honor *Hughes*'s pronouncement that "the legislative privilege's scope is necessarily *broad*" while simultaneously heeding *Jefferson Community*'s instruction that the privilege is "*very limited*?'"[574] How can we follow *Hughes*'s holding that "state legislators [cannot] be compelled to produce documents concerning the legislative process and a legislator's subjective thoughts and motives"[575] when the Parish made that very argument in *Jefferson Community* and the Fifth Circuit didn't accept it?[576] How is *Hughes*'s instruction that privilege and immunity should be "analyzed in parallel" consistent with *Jefferson Community*'s competing instruction that whereas "the common-law legislative *immunity* for state legislators is absolute, the legislative *privilege* for state lawmakers is, at best, one which is qualified"?[577] How could *Hughes*'s assertion "that the legislative privilege stands fast" even when the plaintiff raises "allegations involving racial animus"[578] be true if *Perez*—whose legal conclusions *Jefferson Community* explicitly adopted[579]—held that the state

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[574] *Compare Hughes 5th Cir. Op.*, 68 F.4th at 236 (emphasis added), *with Jefferson Cmty.*, 849 F.3d at 624 (emphasis added) (quoting *Perez*, 2014 WL 106927, at *1).

[575] *See Hughes 5th Cir. Op.*, 68 F.4th at 240.

[576] *Compare Jefferson Cmty. Appellants' Br.* at 32–33 ("Discovery on [the plaintiff's] claim necessarily would involve attempts by [the plaintiff] to delve into the privileged thought processes and motivations underlying the Council's decision to enact the resolutions at issue. But legislative privilege . . . foreclose[s] such an inquiry into the councilmembers' motivations and thought processes . . . ."), *with Jefferson Cmty.*, 849 F.3d at 624 (adopting a much narrower conception of the state legislative privilege).

[577] *Compare Hughes 5th Cir. Op.*, 68 F.4th at 237, *with Jefferson Cmty.*, 849 F.3d at 624 (emphases added) (quoting *Perez*, 2014 WL 106927, at *2).

[578] *See Hughes 5th Cir. Op.*, 68 F.4th at 238.

[579] *See Jefferson Cmty.*, 849 F.3d at 624 (quoting *Perez*, 2014 WL 106927, at *1–2).

See also Bryant, 2017 WL 6520967, at *6 (noting that *Jefferson Community* treated *Perez* "as providing the relevant analysis and law" (citing *Jefferson Cmty.*, 849 F.3d at 624)); *id.* at *7 (emphasizing that *Jefferson Community* "favorably cited and quoted from *Perez* with regard to the qualified nature of the [state legislative] privilege in general").

legislative privilege *doesn't* necessarily "stand fast" in cases involving allegations of racial animus?[580] And how could it simultaneously be true that

(1) *Perez* correctly held that plaintiffs may *sometimes* question state legislators about their motives in redistricting cases (as *Jefferson Community* implies);[581] and

(2) *Lee* correctly held that plaintiffs may *never* question state legislators about their motives in redistricting cases (as *Hughes* implies)?[582]

A. The Rule of Orderliness Requires This Panel to Follow *Jefferson Community* to the Extent it's Inconsistent with *Hughes*

The Fifth Circuit's Rule of Orderliness supplies the way out of that predicament. Because, with limited exceptions that don't apply here, one Fifth Circuit panel can't overrule another Fifth Circuit panel's published decision, the *Hughes* panel was required to follow *Jefferson Community*.[583] Thus, to the extent language in the newer case (*Hughes*) contradicts

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[580] *See Abbott*, 585 U.S. at 603 (noting that the plaintiffs in *Perez* were "claim[ing] that a state law was enacted with [racially] discriminatory intent"); *Perez*, 2014 WL 106927, at *2 (holding that the state legislative privilege doesn't preclude discovery where "the interests of the party seeking . . . evidence" of racially discriminatory intent outweighs "the interests of the individual claiming the privilege"); *see also supra* Section II.C.2.b.iii.

[581] *See Perez*, 2014 WL 106927, at *1–3 (ordering state legislators to sit for depositions); *see also Jefferson Cmty.*, 849 F.3d at 624 (favorably citing *Perez* and adopting several of its holdings).

See also Bryant, 2017 WL 6520967, at *6–7 (inferring from the fact that *Jefferson Community* "favorably cited and quoted from *Perez* with regard to the qualified nature of the [state legislative] privilege in general" that the *Jefferson Community* panel agreed that *Perez* correctly "provid[ed] the relevant analysis and law").

[582] *See Lee*, 908 F.3d at 1188 (concluding that plaintiffs' "claims of racial gerrymandering" weren't "within the subset of 'extraordinary instances' that might justify an exception to the [state legislative] privilege" under *Arlington Heights* (quoting *Arlington Heights S. Ct. Op.*, 429 U.S. at 268)); *see also Hughes*, 68 F.4th at 239 (approving *Lee*'s conclusions).

[583] *See, e.g.*, *PHI Grp., Inc. v. Zurich Am. Ins. Co.*, 58 F.4th 838, 842 n.3 (5th Cir. 2023) ("The rule of orderliness means 'one panel of our court may not overturn another panel's decision, absent an intervening change in the law, such as by a statutory amendment, or the Supreme Court, or our *en banc* court.'" (quoting *Jacobs v. Nat'l Drug Intel. Ctr.*, 548 F.3d 375, 378 (5th Cir. 2008))); *Van Staden v. St. Martin*, 664 F.3d 56, 58 n.3 (5th Cir. 2011) (noting that a published Fifth Circuit decision "may be overruled only by [the Fifth Circuit] sitting en banc or by the Supreme Court").

language in the older case (*Jefferson Community*), the Rule of Orderliness provides that "the newer language has no effect."[584] Because the "rule of orderliness is 'strict and rigidly applied,'"[585] we must follow *Jefferson Community* instead of *Hughes* to the extent they conflict.[586]

B. *Jefferson Community*'s Pronouncements About the State Legislative Privilege are Binding Holdings (Rather Than Non-Binding Dicta) Because They're Explications of the Governing Rules of Law

That said, the Rule of Orderliness only requires courts to follow an earlier Fifth Circuit case's *holdings*; it *doesn't* require courts to follow an earlier case's *dicta*.[587] The first step, therefore, is to determine which of *Jefferson Community*'s statements regarding the legislative privilege's scope and applicability are binding holdings that govern over contrary language in *Hughes*, and which (if any) are nonbinding dicta.

"A statement is dictum if it could have been deleted without seriously impairing the analytical foundations of the holding."[588] "A statement is *not* dictum," however, "if it is necessary to the result *or constitutes an explication of the governing rules of law*."[589] Thus, "the

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[584] *See, e.g.*, *Arnold*, 213 F.3d at 196 n.4 ("[U]nder the rule of orderliness, to the extent that a more recent case contradicts an older case, the newer language has no effect.").

[585] *Ruiz-Perez v. Garland*, 49 F.4th 972, 976 (5th Cir. 2022) (quoting *Bonvillian Mar. Serv., Inc. v. Pellegrin (In re Bonvillian Mar. Serv., Inc.)*, 19 F.4th 787, 792 (5th Cir. 2021)).

[586] *See, e.g.*, *Arnold*, 213 F.3d at 196 n.4.

[587] *E.g.*, *Netsphere, Inc. v. Baron*, 799 F.3d 327, 333 (5th Cir. 2015) ("While it is well-established in this circuit that one panel of this Court may not overrule another, that rule does not apply to dicta." (cleaned up) (quoting *United States v. Segura*, 747 F.3d 323, 328 (5th Cir. 2014))).

[588] *E.g.*, *id.* (quoting *Segura*, 747 F.3d at 328).

[589] *E.g.*, *id.* (quoting *Segura*, 747 F.3d at 328).

principle of *stare decisis* directs" courts "to adhere *not only* to the *holdings* of" published Fifth Circuit cases, "but *also* to their *explications of the governing rules of law*."[590]

The question, then, is this: Is *Jefferson Community*'s statement that the state legislative privilege "cannot bar the adjudication of a claim"[591] the case's only binding holding, as the *Hughes* panel apparently believed?[592] Or is *Jefferson Community*'s pronouncement that the state legislative privilege "must be strictly construed and accepted only to [a] very limited extent"[593] *also* a binding holding that the Fifth Circuit was required to follow in *Hughes* (and that we're required to follow now)?

The answer? The latter. A statement in a published Fifth Circuit opinion that sets forth the legal standard that courts should apply when considering a particular issue is "an explication of the governing rules of law"—and, thus, a binding holding.[594] The passage of *Jefferson*

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[590] *E.g.*, *Gochicoa v. Johnson*, 238 F.3d 278, 286 n.11 (5th Cir. 2000) (emphases added) (quoting *Seminole Tribe of Fla. v. Florida*, 517 U.S. 44, 67 (1996)).

[591] *See Jefferson Cmty.*, 849 F.3d at 624.

[592] *See Hughes 5th Cir. Op.*, 68 F.4th at 240 (asserting that *Jefferson Community* "held only that a claim for injunctive relief could proceed," and "sa[id] nothing" about whether "state legislators can be compelled to produce documents concerning the legislative process and a legislator's subjective thoughts and motives").

[593] *See Jefferson Cmty.*, 849 F.3d at 624 (quoting *Perez*, 2014 WL 106927, at *1).

[594] *See, e.g.*, *Env't Tex. Citizen Lobby, Inc. v. ExxonMobil Corp.*, 47 F.4th 408, 420 n.3 (5th Cir. 2022) (footnote of prior Fifth Circuit opinion "explicat[ing] the legal standard necessary to correct noncompliance" with environmental laws was "not dictum" because it "constitute[d] an explication of the governing rules of law" (cleaned up) (quoting *Int'l Truck & Engine Corp. v. Bray*, 372 F.3d 717, 721 (5th Cir.), *opinion corrected on denial of reh'g en banc*, 380 F.3d 231 (5th Cir. 2004))), *reh'g en banc granted*, 61 F.4th 1012 (5th Cir. 2023); *Douglass v. Nippon Yusen Kabushiki Kaisha*, 996 F.3d 289, 298 (5th Cir. 2021) (prior Fifth Circuit opinion's "references to [a Supreme Court case] and its general jurisdiction test" were "explications of the governing rules of law" that bound subsequent Fifth Circuit panels (cleaned up) (quoting *Int'l Truck*, 372 F.3d at 721)), *on reh'g en banc*, 46 F.4th 226 (5th Cir. 2022); *Barron & Newburger, P.C. v. Tex. Skyline, Ltd. (In re Woerner)*, 758 F.3d 693, 701–02 (5th Cir. 2014) (portion of prior Fifth Circuit opinion "discuss[ing] the applicable standard" and selecting one of "two possible tests advocated by the parties" was an "explication[] of the governing rules of law" that bound subsequent

Community instructing courts in this Circuit how they should "construe[]" the state legislative privilege and when they should "accept[]" it articulates the legal standards governing state legislative privilege claims.[595] That passage is therefore "an explication of the governing rules of law" that the *Hughes* court was bound to follow.[596]

Hughes nevertheless contradicts that binding holding by disregarding *Jefferson Community*'s "strictly construed" and "very limited" language[597] and by articulating a "broad" conception of the state legislative privilege that bears little resemblance to the "limited" privilege

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Fifth Circuit panels (quoting *Gochicoa*, 238 F.3d at 286 n.11)), *on reh'g en banc*, 783 F.3d 266 (5th Cir. 2015).

See also, e.g., *Hairston v. Groneolsky*, No. 07-5487, 2008 WL 630041, at *3 (D.N.J.) (explaining that "a lower court is bound by" a "higher court's choice of legal standard or test," "not simply to the result alone" (cleaned up) (quoting *Planned Parenthood Se. of Pa. v. Casey*, 947 F.2d 682, 691–92 (3d Cir. 1991), *aff'd in part and rev'd in part on other grounds*, 505 U.S. 833 (1992))), *aff'd*, 313 F. App'x 490 (3d Cir. 2008).

[595] *See Jefferson Cmty.*, 849 F.3d at 624 (quoting *Perez*, 2014 WL 106927, at *1).

[596] *See, e.g.*, *Netsphere*, 799 F.3d at 333 (emphases added) (quoting *Segura*, 747 F.3d at 328).

See also Private Pls.' Reply, ECF No. 735, at 2 (arguing (correctly) that "*Hughes* did not—and could not—disturb Supreme Court precedent or the Fifth Circuit's statements that the privilege is qualified and must be strictly construed").

[597] *Compare Jefferson Cmty.*, 849 F.3d at 624 ("[The state legislative] privilege '*must be strictly construed and accepted only to the very limited extent that permitting a refusal to testify to excluding relevant evidence has a public good transcending* the normally predominant principle of utilizing all rational means for ascertaining the truth." (emphasis added) (quoting *Perez*, 2014 WL 106927, at *1)), *with Hughes 5th Cir. Op.*, 68 F.4th at 236 ("[T]he legislative privilege is "qualified" by *exceptions* that serve 'the normally predominant principle of utilizing all rational means for ascertaining the truth.'" (emphasis added) (quoting *Jefferson Cmty.*, 849 F.3d at 624)).

See also supra Section II.C.2.f.ii.

that *Jefferson Community* espouses.[598] The Rule of Orderliness therefore requires us to follow *Jefferson Community* to *Hughes*'s exclusion.[599]

C. *Jefferson Community*'s Implicit Conclusion that the State Legislative Privilege Doesn't Categorically Bar Inquiries into Legislative Motivation Likewise Has Precedential Effect

While it's indisputable *that Jefferson Community* says the state legislative privilege is "qualified," "strictly construed," and "very limited," it's less obvious *why Jefferson Community* says that.[600] One would ordinarily expect that, after articulating the legal standards that govern state legislative privilege claims, the *Jefferson Community* panel would have then explained *how* those standards applied to the facts of the case. For instance, the court might have followed its explication of the applicable law with a concluding sentence like: "Because we conclude that allowing the Parish councilmembers to shield their reasons for passing the challenged resolutions wouldn't serve a 'public good' that transcends 'the normally predominant principle of utilizing all means for ascertaining the truth,' the 'qualified' state legislative privilege doesn't categorically bar the plaintiff from inquiring into the Parish's motivations." Had the *Jefferson Community* panel done something like that, it'd be more immediately evident why the Fifth Circuit had bothered to articulate the governing legal standard and adopt *Perez*'s holdings in the first place.

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[598] *Compare Hughes 5th Cir. Op.*, 68 F.4th at 236 ("[T]he legislative privilege's scope is necessarily broad."), *with Jefferson Cmty.*, 849 F.3d at 624 ("Th[e] privilege 'must be strictly construed and accepted only to [a] very limited extent . . . .'" (quoting *Perez*, 2014 WL 106927, at *1)).

See also supra Section II.C.2.f.ii.

[599] *See, e.g.*, *Arnold*, 213 F.3d at 196 n.4.

[600] *See Jefferson Cmty.*, 849 F.3d at 624 (quoting *Perez*, 2014 WL 106927, at *1–2).

But *Jefferson Community* didn't do that.[601] Instead, immediately after proclaiming that "the legislative privilege for state lawmakers" is "qualified," "strictly construed," and "very limited,"[602] the Fifth Circuit jumped straight to opining that, "[a]t any rate, even assuming that the councilmember's reasons for passing the resolutions are privileged in the sense that they cannot be directly compelled to disclose them, this evidentiary privilege cannot bar the adjudication of a claim."[603]

From that absence of a sentence explicitly applying *Jefferson Community*'s narrow conception of the state legislative privilege to the case's specific facts, *Hughes* infers that *Jefferson Community*'s more general pronouncements about the state legislative privilege are throwaways that courts may disregard.[604] Without mentioning *Jefferson Community*'s explicit admonition that the state legislative privilege "must be strictly construed and accepted only to [a] very limited extent,"[605] *Hughes* proclaims that *Jefferson Community* "said *only* that '[a]t any rate, even assuming that the councilmembers' reasons for passing the resolutions are privileged in the sense that they cannot be directly compelled to disclose them, this evidentiary privilege cannot bar the adjudication of a claim.'"[606] The *Hughes* panel therefore declared that *Jefferson*

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[601] *See id*.

[602] *See id*. (quoting *Perez*, 2014 WL 106927, at *1–2).

[603] *See id*.

[604] *See Hughes 5th Cir. Op.*, 68 F.4th at 240 ("Plaintiffs' reliance on *Jefferson Community* . . . is misplaced. That decision stated that '[w]hile the common-law legislative immunity for state legislators is absolute, the legislative privilege for state lawmakers is, at best, one which is qualified. But that case provides no support for the idea that state legislators can be compelled to produce documents concerning the legislative process and a legislator's subjective thoughts and motives.").

[605] *Compare Jefferson Cmty.*, 849 F.3d at 624 (quoting *Perez*, 2014 WL 106927, at *1–2), *with Hughes 5th Cir. Op.*, 68 F.4th at 240.

[606] *See Hughes 5th Cir. Op.*, 68 F.4th at 240 (emphasis added) (quoting *Jefferson Cmty.*, 849 F.3d at 624).

Community "held *only* that a claim for injunctive relief could proceed," and thereby "sa[id] nothing about cases" in which litigants seek evidence bearing on a state legislature's motives for passing an allegedly discriminatory law.[607]

But if, as *Hughes* asserts, *Jefferson Community* "held only that a claim for injunctive relief could proceed" and "sa[id] nothing" about the state legislative privilege's applicability more generally,[608] then the *Jefferson Community* panel would have had no reason to emphasize the privilege's "qualified," "strictly construed," and "very limited" nature.[609] In other words, if *Jefferson Community* stood merely for the mundane proposition that the state legislative privilege "cannot bar the adjudication of a claim,"[610] the Fifth Circuit could have just said that by itself, and that would have sufficed to resolve the issue. *Jefferson Community*'s more general pronouncements about the state legislative privilege's narrowness must therefore serve *some* purpose in the analysis, or else the court would have omitted them.

That purpose becomes clear when one reviews the appellate briefs. As discussed, the Parish urged the *Jefferson Community* panel to adopt an expansive conception of the state legislative privilege that categorically "foreclose[s] . . . an[y] inquiry into the councilmembers' motivations and thought processes."[611] In other words, the Parish (unsuccessfully) asked the

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[607] *See id*. (emphasis added).

[608] *Contra id*.

[609] *See Jefferson Cmty.*, 849 F.3d at 624 (quoting *Perez*, 2014 WL 106927, at *1–2).

[610] *Contra Hughes 5th Cir. Op.*, 68 F.4th at 240 (quoting *Jefferson Cmty.*, 849 F.3d at 624).

[611] *See Jefferson Cmty. Appellants' Br.* at 32–33; *see also supra* Section II.C.2.d.

Jefferson Community panel to adopt the exact same absolutist conception of the state legislative privilege that *Hughes* ultimately espoused six years later.[612]

By declaring instead that the state legislative privilege is "qualified," "strictly construed," and "very limited,"[613] *Jefferson Community* necessarily refuted the Parish's premise that the state legislative privilege categorically forbade the plaintiff from "delv[ing] into the . . . thought processes and motivations underlying the [Parish]'s decision to enact the resolutions at issue."[614] *Jefferson Community* thus rejected the very same conception of the privilege that the Fifth Circuit would later adopt in *Hughes*.[615]

Thus, while the court admittedly could have said so more clearly, the entire reason why the *Jefferson Community* panel adopted *Perez*'s narrow conception of the state legislative privilege appears to have been to disabuse the Parish of its notion that state and local legislators' thoughts and motives are completely off limits.[616] So even though *Jefferson Community* doesn't say *expressly* that the state legislative privilege doesn't necessarily "foreclose . . . inquir[ies]" into the "thought processes and motivations underlying [a state legislature's] decision to enact" a particular law,[617] the case necessarily stands for that proposition.[618]

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[612] *See Hughes 5th Cir. Op.*, 68 F.4th at 240 (opining that state legislators cannot "be compelled to produce documents concerning . . . a legislator's subjective thoughts and motives").

[613] *See Jefferson Cmty.*, 849 F.3d at 624.

[614] *Contra Jefferson Cmty. Appellants' Br.* at 32–33.

[615] *See supra* note 612 and accompanying text.

[616] *Compare Jefferson Cmty.*, 849 F.3d at 624, *with Jefferson Cmty. Appellants' Br.* at 32–33.

[617] *Contra Jefferson Cmty. Appellants' Br.* at 33.

[618] *See Jefferson Cmty.*, 849 F.3d at 624.

The *Hughes* panel was required to follow that implicit conclusion. "The rule of orderliness applies as equally to a panel's implicit reasoning as it does to its express holdings."[619] Thus, "an earlier panel decision binds" a later panel even if the earlier case "does not explicitly address arguments presented to the later panel."[620] So, to the extent *Hughes* asserts that *Jefferson Community* "provides no support for the idea that state legislators can be compelled to produce

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[619] *Newman v. Plains All Am. Pipeline, L.P.*, 23 F.4th 393, 400 n.28 (5th Cir. 2022).

There are of course instances in which implicit conclusions in published Fifth Circuit opinions *don't* have precedential effect. For instance, suppose—counterfactually—that the Parish *hadn't* argued in *Jefferson Community* that the "legislative privilege . . . foreclose[d] . . . inquir[ies] into the councilmembers' motivations and thought processes." *Contra Jefferson Cmty. Appellants' Br.* at 33. One couldn't then infer from *Jefferson Community*'s pronouncement that the state legislative privilege is "qualified," "strictly construed," and "very limited" that the Fifth Circuit took any position on whether the privilege bars inquiries into a state legislature's motives, because there'd be no reason to think that the panel had ever given the issue reasoned consideration. *Cf., e.g.*, *Richardson v. Tex. Sec'y State*, 978 F.3d 220, 229 n.15 (5th Cir. 2020) ("Even if our previous decision 'implicitly' relied on the presence of a cognizable interest, that assumption is not binding if the adverse party 'did not challenge' and 'we did not consider' that issue." (quoting *Thomas v. Tex. Dep't Crim. Just.*, 297 F.3d 361, 370 n.11 (5th Cir. 2002))).

But the Parish *did* expressly "raise[] [the] issue" of whether the state legislative privilege categorically bars inquiries into legislative motivation, and the *Jefferson Community* panel evidently "g[ave] that issue reasoned consideration." *Cf. Ochoa-Salgado*, 5 F.4th at 619 (emphases omitted). Consequently, "[t]he rule of orderliness applies as equally to" *Jefferson Community*'s "implicit reasoning as it does to its express holdings." *See Newman*, 23 F.4th at 400 n.28.

[620] *United States v. Berry*, 951 F.3d 632, 636 (5th Cir. 2020).

Although some pre-*Berry* opinions state that the Fifth Circuit hasn't yet decided whether "a panel is bound by a prior panel's holding if the prior panel did not consider or address a potentially dispositive argument made before the later panel," *see, e.g.*, *United States v. Juarez-Martinez*, 738 F. App'x 823, 825 n.2 (5th Cir. 2018), the *Berry* court took a firm position on that question when it concluded in 2020 that "an earlier panel decision binds even if that panel's opinion does not explicitly address arguments presented to the later panel," *see Berry*, 951 F.3d at 636.

To the extent one of the Fifth Circuit's *post*-*Berry* opinions suggests that the issue still remains open in the Fifth Circuit—without citing *Berry* or otherwise acknowledging that *Berry* decided that issue several months earlier—*see Richardson*, 978 F.3d at 229 n.15, we must follow *Berry* under the Rule of Orderliness, *see Arnold*, 213 F.3d at 196 n.4.

documents concerning the legislative process and a legislator's subjective thoughts and motives," we must follow *Jefferson Community*'s necessary implication to the contrary.[621]

D. *Jefferson Community*'s Pronouncements About the State Legislative Privilege are Binding Alternative Holdings

Further undermining *Hughes*'s assertion that *Jefferson Community* "held only that a claim for injunctive relief could proceed" and "sa[id] nothing about cases" in which litigants seek evidence of "a legislator's subjective thoughts and motives"[622] is the fact that when a published Fifth Circuit opinion contains alternative holdings, both holdings are binding; neither constitutes non-binding dicta.[623]

To illustrate, suppose that the Fifth Circuit issues a published opinion holding that some legal proposition—let's call it "Legal Proposition X"—defeats the appellant's appeal. Suppose also, however, that in the next paragraph of that very same opinion, the Fifth Circuit then says: "*Even assuming* for the sake of argument that Legal Proposition X were *false*, the appellant would *still* lose, because Legal Proposition *Y* is true." In that circumstance, the phrase "even assuming"[624] would signal that the Fifth Circuit had determined that Legal Proposition X and

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[621] *Contra Hughes 5th Cir. Op.*, 68 F.4th at 240.

[622] *Contra id.*

[623] *See, e.g.*, *Mejia-Alvarenga v. Garland*, 95 F.4th 319, 326 n.2 (5th Cir. 2024) ("Alternative holdings are not dicta and are binding in this circuit." (citing *Texas v. United States*, 809 F.3d 134, 178 n.158 (5th Cir. 2015), *aff'd by an equally divided Court*, 579 U.S. 547 (2016))).

[624] Of course, the phrase "even assuming" isn't the *only* way the Fifth Circuit might signify that a legal proposition is a binding alternative holding. *See, e.g.*, *United States v. Wallace*, 964 F.3d 386, 389–90 (5th Cir. 2020) (identifying examples of the Fifth Circuit "signaling an alternative holding" with phrases like "even were" and "even if," as well as several examples of the Fifth Circuit stating outright that a portion of an opinion was an "alternative holding" and "not dicta").

Nor does textual material following a phrase like "even assuming" *always* constitutes a binding alternative holding. *See, e.g.*, *Moreland v. Fed. Bureau of Prisons*, 431 F.3d 180, 185 (5th Cir. 2005) (analysis of nonjurisdictional issue following the phrase "[e]ven if we were to assume arguendo that we have subject-matter jurisdiction" "was dicta" and "not an alternative holding because it could not support

Legal Proposition Y were *both* true, and that *either* proposition *by itself* would have sufficed to defeat the appellant's claim.[625] Both propositions would therefore be alternative holdings, and both would thus have binding precedential effect for Rule of Orderliness purposes.[626]

As we explicitly determined the last time this issue was before us,[627] that's exactly how *Jefferson Community* proceeds.[628] To refute the Parish's argument that the councilmembers' "reasons for passing the [challenged] resolutions were privileged," the Fifth Circuit first decided that "the legislative privilege for state [and local] lawmakers is . . . one which is qualified," "very limited," and "strictly construed."[629] Only *after* rejecting the Parish's contention that its "reasons for passing the [challenged] resolutions were privileged" did the court then conclude that, "*even assuming*" counterfactually "that the councilmembers' reasons for passing the resolutions *[we]re*

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the actual judgment in that case, which was dismissal for lack of subject-matter jurisdiction rather than an affirmance of the district court's judgment").

[625] *Compare United States v. Rose*, 587 F.3d 695, 705, 706 n.9 (5th Cir. 2009), *abrogated in non-relevant part by Rehaif v. United States*, 139 S. Ct. 2191 (2019) ("Rose claims that . . . 18 U.S.C. § 924(a)(2)[] requires proof that he knowingly violated 18 U.S.C. § 922(g) . . . . While it may be true that § 924(a)(2) applies a *mens rea* requirement, Rose was not sentenced under that provision. Rather, he was sentenced under § 924(e)(1), which contains no such requirement. . . . *Even assuming arguendo* that the 'knowingly' requirement in § 924(a)(2) applied [to § 924(e)(1)], there would be no corresponding impact on the elements of a crime listed in § 922(g)(1)." (cleaned up) (emphasis added)), *with United States v. Potts*, 644 F.3d 233, 237 (5th Cir. 2011) ("[In *Rose*], the defendant raised the same argument as Potts does here, but we rejected it because the defendant had not been sentenced under § 924(e)(1), which does not contain a 'knowingly' requirement. *We went on, however, to state that even assuming arguendo* that the 'knowingly' requirement in § 924(a)(2) applied [to § 924(e)(1)], there would be no corresponding impact on the elements of a crime listed in § 922(g)(1). *That statement in Rose was not mere dictum; rather, it was an alternate holding that carries the force of precedent.*" (cleaned up) (emphases added)).

[626] *See, e.g.*, *Potts*, 644 F.3d at 237.

[627] *See LULAC Doc. Subpoena Op.*, 2022 WL 2921793, at *3 (rejecting the Legislators' argument "that the discussion of state legislative privilege in *Jefferson Community*" was "mere dicta" because "alternative holdings are not dicta and are binding in this circuit" (cleaned up) (quoting *Jaco*, 24 F.4th at 406 n.5)); *see also supra* Section II.C.2.e.iii.

[628] *See Jefferson Cmty.*, 849 F.3d at 624.

[629] *See id.* (quoting *Perez*, 2014 WL 106927, at *1–2); *see also supra* Section II.C.2.d.

privileged," the state legislative privilege still could not "bar the adjudication of [the plaintiff's] claim."[630] Thus, the portion of *Jefferson Community* that precedes the phrase "even assuming" is just as much a binding alternate holding as the portion that comes after.[631]

After all, if the *Jefferson Community* panel believed—as *Hughes* would later hold—that state legislators can't "be compelled to produce documents concerning the legislative process and a legislator's subjective thoughts and motives,"[632] then the panel would have had no reason to merely "*assum[e]* that the councilmembers' reasons for passing the resolutions [we]re privileged in the sense that they [could not] be directly compelled to disclose them."[633] (After all, there's no reason to "assume" something that one knows to be true.) The *Jefferson Community* panel could then have instead just said that the state legislative privilege "cannot bar the adjudication of a claim" and been done with it—without saying a word about the privilege being "qualified," "very limited," or "strictly construed."[634]

Thus, the reading of *Jefferson Community* that gives full effect to every portion of the opinion is that the Fifth Circuit held *both*

(1) "that the councilmembers' reasons for passing the resolutions" were *not* "privileged" as the Parish asserted, *and*

(2) that the Parish would have lost "*even assuming*" that they were.[635]

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[630] *See Jefferson Cmty.*, 849 F.3d at 624 (emphases added).

[631] *See, e.g.*, *Potts*, 644 F.3d at 237.

[632] *Contra Hughes 5th Cir. Op.*, 68 F.4th at 240.

[633] *See Jefferson Cmty.*, 849 F.3d at 624 (emphasis added).

[634] *Contra id.* (quoting *Perez*, 2014 WL 106927, at *1–2).

[635] *See id.*

Jefferson Community's explicit and implicit conclusions about the state legislative privilege's scope therefore aren't mere dicta as *Hughes* suggests.[636] They're instead alternative holdings, either of which would have sufficed by themselves to defeat the Parish's legislative privilege arguments. The *Hughes* court was therefore bound to follow both of those holdings, and so are we.[637]

E. *Hughes* Didn't Successfully Reconcile Itself with *Jefferson Community*

Of course, if *Hughes* successfully reconciled itself with *Jefferson Community*, we'd be bound to follow *Hughes* to the extent there remained any lingering doctrinal tension between the two opinions.[638] But *Hughes* simply doesn't address the language in *Jefferson Community* that forecloses *Hughes*'s legal conclusions.[639] Again, *Hughes* doesn't mention *Jefferson Community*'s holding that the state legislative privilege "must be strictly construed"—and, as a consequence, *Hughes* makes no attempt to explain how its expansive rulings "strictly construe"

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[636] *Contra Hughes 5th Cir. Op.*, 68 F.4th at 240.

[637] *See, e.g.*, *Mejia-Alvarenga*, 95 F.4th at 326 n.2.

[638] *See Odle v. Flores*, 899 F.3d 342, 343 (5th Cir. 2017) ("[The appellee] asserts that [the Fifth Circuit's prior opinion in] *Sommers* is contrary to prior opinions of this Court and must be disregarded under the rule of orderliness. But *Sommers* reconciled those supposedly problematic cases, and [the appellee]'s arguments amount to a request that we second-guess *Sommers*. *That* the rule of orderliness prohibits." (citations omitted)); *see also Sommers v. Bank of Am., N.A.*, 835 F.3d 509, 513 n.5 (5th Cir. 2016) (identifying dispositive differences between the facts of *Sommers* and those of the earlier Fifth Circuit cases that the appellee later cited in *Odle*).

[639] *Cf. Thompson v. Dall. City Att'y's Off.*, 913 F.3d 464, 467–68 (5th Cir. 2019) ("It would be one thing had [the Fifth Circuit panel that decided an earlier case called *Henson*] attempted to explain (however implausibly) why [a binding Supreme Court case named *McCurry*] was inapt. But instead of distinguishing *McCurry*, the panel disregarded it . . . . As *Henson* turns a blind eye to *McCurry*, *Henson*'s holding is irreconcilable, and thus inoperative, and has been since it was decided.").

Admittedly, this argument would be stronger if *Hughes* hadn't acknowledged *Jefferson Community* at all (as opposed to acknowledging only *parts* of it). *See id.* at 467 ("Oddly, *Henson* never discusses *McCurry*. More oddly, *Henson* never even acknowledges *McCurry*.").

the privilege in conformance with binding precedent.[640] Nor does *Hughes* attempt to explain how its holdings obey *Jefferson Community*'s command that the state legislative privilege must be "accepted only to the very limited extent that permitting a refusal to testify or excluding relevant evidence" serves some paramount "public good"—*Hughes* just omits that language from its quotations.[641] Applying *Hughes* to bar the discovery that Plaintiffs seek here would therefore require us to disregard substantial portions of an earlier binding Fifth Circuit opinion and thereby disobey the Rule of Orderliness.[642]

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[640] *Compare Hughes 5th Cir. Op.*, 68 F.4th at 231–40, *with Jefferson Cmty.*, 849 F.3d at 624 (quoting *Perez*, 2014 WL 106927, at *1). *See also supra* Section II.C.2.f.ii.

[641] *Compare Jefferson Cmty.*, 849 F.3d at 624 (quoting *Perez*, 2014 WL 106927, at *1), *with Hughes 5th Cir. Op.*, 68 F.4th at 236 ("Instead, like other privileges, the legislative privilege is 'qualified' by exceptions that serve 'the normally predominant principle of utilizing all rational means for ascertaining the truth.'" (quoting *Jefferson Cmty.*, 849 F.3d at 624)). *See also supra* Section II.C.2.f.ii.

[642] After our panel issued its Memorandum Opinion and Order, but before this dissenting opinion was ready, the Fifth Circuit released another published opinion analyzing legislative privilege issues in a case called *Bettencourt*. *See also La Union del Pueblo Entero v. Abbott (Bettencourt)*, 93 F.4th 310 (5th Cir. 2024). *Bettencourt* mirrors *Hughes*'s conclusion that civil cases raising "constitutional or statutory claim[s] involving racial animus" "are not extraordinary" enough to overcome the state legislative privilege. *Id.* at 324–25.

However, *Bettencourt* doesn't analyze how its conclusions (or *Hughes*'s conclusions) are consistent with *Jefferson Community* under the Rule of Orderliness. *See id.* at 313–25 & nn.1–24. Indeed, *Bettencourt* doesn't mention *Jefferson Community* at all. *See id.*

Thus, just as our panel must follow *Jefferson Community* to the extent it's inconsistent with *Hughes*, we must likewise follow *Jefferson Community* to the extent it's inconsistent with *Bettencourt*. *See, e.g.*, *Arnold*, 213 F.3d at 196 n.4 ("[T]o the extent that a more recent case contradicts an older case, the newer language has no effect.").

IV. The Proper Approach Under the Rule of Orderliness

We should therefore discharge our mandate to reexamine our prior order overruling the Texas Legislators' privilege objections to the United States's documentary discovery demands as follows.[643] The Rule of Orderliness requires us to adhere to *Jefferson Community*'s qualified approach to the state legislative privilege, rather than *Hughes*'s absolutist approach.[644] We must therefore obey *Jefferson Community*'s command to "strictly construe[]" the state legislative privilege and "accept[] [it] only to the very limited extent that permitting a refusal to testify or excluding relevant evidence" in this case would have "a public good transcending the normally predominant principle of utilizing all rational means for ascertaining the truth."[645]

We must likewise follow *Jefferson Community*'s implicit conclusion that the state legislative privilege doesn't categorically bar discovery regarding the Texas Legislature's "reasons for passing" the challenged redistricting plans[646]—as opposed to *Hughes*'s contrary holding that state legislators cannot "be compelled to produce documents concerning the legislative process and a legislator's subjective thoughts and motives" even when a plaintiff raises "allegations involving racial animus."[647]

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[643] *See LULAC Remand Order*, 2023 WL 4697109, at *1 (vacating our document subpoena order "in light of . . . *Hughes*" and remanding for further proceedings).

[644] *See supra* Section III.

[645] *See Jefferson Cmty.*, 849 F.3d at 624 (emphasis added) (quoting *Perez*, 2014 WL 106927, at *1).

[646] *See id.*; *see also supra* Section III.C.

[647] *Contra Hughes 5th Cir. Op.*, 68 F.4th at 238, 240.

We should also follow *Jefferson Community*'s signal that *Perez* supplies the correct legal standard for adjudicating state legislative privilege claims in redistricting cases.[648] Thus, just like we did when this issue was last before us,[649] we should use *Rodriguez* and *Perez*'s five-factor balancing framework to weigh "the interests of the party seeking the evidence against the interests of the individual claiming the privilege."[650] As we previously determined, the balance of those factors favors disclosure here, so we should order the Legislators to produce the same documents we previously commanded them to produce.[651]

At the absolute minimum, irrespective of whether we let the *private* Plaintiffs in this case obtain their requested discovery,[652] we should at least let the *federal government*, as a sovereign entity charged with the responsibility to enforce federal laws, obtain documents bearing on whether the State of Texas violated those laws.[653]

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[648] *See Jefferson Cmty.*, 849 F.3d at 624 (citing *Perez*, 2014 WL 106927, at *1–2); *see also supra* note 425 and accompanying text.

[649] *See supra* Section II.C.2.e.iii.

[650] *See Perez*, 2014 WL 106927, at *2; *see also supra* Section II.C.2.b.iii (analyzing *Perez*); Section III.C.2.b.i (analyzing *Rodriguez*).

Cf. MC Trilogy Tex., LLC v. City of Heath, No. 3:22-CV-2154, 2024 WL 346512, at *4 (N.D. Tex. Jan. 29, 2024) (continuing to employ *Rodriguez*'s five-factor balancing framework notwithstanding *Hughes* (albeit without explicitly performing a Rule of Orderliness analysis)).

[651] *See LULAC Doc. Subpoena Op.*, 2022 WL 2921793, at *13–14; *see also supra* Section II.C.2.b.ii.

[652] *See Majority Op.*, 2023 WL 8880313, at *6 ("[T]he legislative privilege does not yield for the private plaintiffs in this case.").

[653] *Cf., e.g.*, *Alviti*, 14 F.4th at 88 (concluding that private party's civil suit didn't implicate federal interests sufficiently "important" to overcome the state legislative privilege in part because the federal government wasn't a party to the case).

But see Page, 15 F. Supp. 3d at 667 (concluding that "the nature of the claims in" a redistricting case "weigh[ed] strongly in favor of document disclosure," even though the suit was "not brought on behalf of the United States" (quoting *Rodriguez*, 280 F. Supp. 2d at 102)).

Because the majority's Memorandum Opinion and Order doesn't proceed in that fashion,[654] I respectfully **DISSENT**.

V. A Call for Clarity

Cases like this one raise serious concerns that the absolutist conception of the state legislative privilege that more and more federal Circuits are adopting may effectively enable state legislatures to conceal evidence of discriminatory intent behind an impenetrable wall,[655] and thereby prevent litigants from vindicating the statutory and constitutional rights that form the backbone of our democracy.[656]

But this case also raises more technical concerns about doctrinal consistency and predictability. As the foregoing discussion illustrates, the state legislative privilege caselaw is in a state of disarray.[657] On one end of the continuum are courts flatly declaring that the privilege is completely "insurmountable in private civil [rights] actions."[658] On the opposite end are courts suggesting that the privilege doesn't protect internal legislative documents at all.[659] Between

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[654] *See generally Majority Op.*, 2023 WL 8880313.

[655] That's not to imply that any members of this panel think anything either way about whether the documents that the Legislators are withholding in this case contain evidence of intentional racial discrimination. It's merely to say that Plaintiffs should have a chance to look at those documents and determine that for themselves.

[656] *See supra* Section I.

[657] *See, e.g.*, *Cave*, 2021 WL 4936185, at *4 (observing that "courts that have addressed the [state legislative] privilege" have "not agree[d] on its scope").

[658] *See Pernell*, 84 F.4th at 1344.

[659] *See Miles-Un-Ltd.*, 917 F. Supp. at 100 ("Although the doctrine of legislative immunity [sic] does apply in the personal testimony realm, the immunity does not extend to certain types of documentation requests. Accordingly, a defendant will be required to produce, at the request of a plaintiff, any documents that were prepared by a committee during the course of its deliberations." (first citing *Corporacion Insular de Seguros v. Garcia*, 709 F. Supp. 288, 297 (D.P.R. 1989); then citing *Marylanders*, 144 F.R.D. at 302 n.20 (opinion of Smalkin, J.))).

those two poles, courts have reached a wide range of results.[660] And even different panels of the *same Circuit* have reached contradictory conclusions about the state legislative privilege's coverage, as *Jefferson Community* and *Hughes* demonstrate.[661]

Lower courts considering state legislative privilege issues would therefore benefit greatly from settled Supreme Court or Fifth Circuit precedent answering questions like:

(1) What characteristics make a civil case sufficiently "extraordinary" to justify calling state legislators "to the stand at trial to testify concerning the purpose of [an] official action?"[662]

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[660] *Compare, e.g.*, *Benisek*, 241 F. Supp. 3d at 576 (redistricting case letting plaintiffs "depose [state legislators] and obtain direct evidence of motive and intent" (emphasis omitted)), *with, e.g.*, *Comm. for a Fair & Balanced Map*, 2011 WL 4837508, at *10 (forbidding plaintiffs from obtaining "information concerning the motives[] [and] objectives" underlying a redistricting plan, but letting plaintiffs obtain "facts or information available to lawmakers at the time of their decision"), *with, e.g.*, *Majority Op.*, 2023 WL 8880313, at *3 ("The [state] legislative privilege protects the possession, preparation, or review of factual information when disclosure would invariably reveal the legislator's deliberations." (cleaned up) (quoting *1997 Sealed Case*, 121 F.3d at 737)).

[661] *See supra* Sections II.C.2.d and II.C.2.f.ii.

[662] *See Arlington Heights S. Ct. Op.*, 429 U.S. at 268; *see also Gillock*, 445 U.S. at 373 (holding that the state legislative privilege "yields" "where important federal interests are at stake").

See also Trombetta v. Bd. of Educ., Proviso Twp. High Sch. Dist. 209, No. 02 C 5895, 2004 WL 868265, at *5 (N.D. Ill. Apr. 22, 2004) ("*Arlington Heights* . . . says only that in some extraordinary instances the members of a legislative body might be called to the stand at trial to testify concerning the purpose of the official action . . . [I]t does not describe the circumstances in which such testimony is or is not appropriate . . . ." (cleaned up) (quoting *Arlington Heights S. Ct. Op.*, 429 U.S. at 268)); *Majority Op.*, 2023 WL 8880313, at *7 (opining that although "[c]aselaw provides examples of what an extraordinary civil case is *not*," "we know much less about what *[does]* count[] as an extraordinary civil case" (emphasis added)).

Compare, e.g., *Bethune-Hill*, 114 F. Supp. 3d at 337 (reasoning that cases in which a plaintiff attacks a redistricting plan as racially discriminatory are "extraordinary" under *Arlington Heights*), *with, e.g.*, *Bettencourt*, 93 F.4th at 325 (concluding that voting rights case in which plaintiffs accused the Texas Legislature of enacting a law "with an intent to discriminate against racial minorities" was not "extraordinary" because it did not "implicate any important federal interest *beyond* constitutional or statutory claims of racial animus").

(2) How should lower courts reconcile *Tenney*'s pronouncement that it's "not consonant with our scheme of government for a court to inquire into the motives of legislators"[663] with Supreme Court precedent holding that courts *must* inquire into the motives of legislators in intentional discrimination cases?[664]

(3) Do concerns about interference with state legislators apply with equal force when a litigant isn't trying to *sue* a state legislator, but is instead merely seeking to *depose* a *nonparty* legislator (or is demanding that a nonparty legislator *produce nonpublic documents and communications*)?[665]

(4) Given that the U.S. Constitution's Speech or Debate Clause only protects *federal* legislators,[666] and given that the policy rationales that justify a broad *federal* legislative privilege don't apply equally to *state* legislators,[667] to what extent does the *state* legislative privilege overlap with its *federal* counterpart?[668]

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[663] *See Tenney*, 341 U.S. at 377; *see also supra* Section II.C.1.

[664] *See, e.g.*, *Hunt*, 526 U.S. at 547 (1999) ("[A]ppellees . . . were required to prove that [the challenged district] was drawn with an impermissible racial motive . . . .").

See also Pernell, 84 F.4th at 1353 (Jill Pryor, J., dissenting) ("Although as a general matter it is 'not consonant with our scheme of government for a court to inquire into the motives of legislators,' such an inquiry is exactly what a disparate impact claim requires." (quoting *Tenney*, 341 U.S. at 377)).

[665] *Compare, e.g.*, *Gillock*, 445 U.S. at 371–73 (suggesting that whereas courts must be especially "sensitiv[e] to" the risk of "interference with the functioning of state legislators" when "a private plaintiff" *sues* a state legislator "to vindicate private rights," the mere "denial of a *privilege* to a state legislator may have" only a "minimal impact on the exercise of his legislative function" (emphasis added)), *and Loesel*, 2010 WL 456931, at *6 ("Undoubtedly, interference with the legislative process is greater when a state legislator is called upon to defend him or herself against a lawsuit, than when he or she is merely called upon to testify in a civil case."), *with, e.g.*, *Hubbard*, 803 F.3d at 1310 (holding that "the privilege extends to discovery requests[] even when the lawmaker is not a named party to the suit" because "complying with such requests detracts from the performance of official duties").

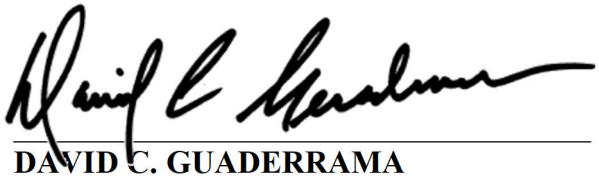
[666] *See supra* notes 102–103 and accompanying text.

[667] *See, e.g.*, *Gillock*, 445 U.S. at 369–70 (explaining that the separation of powers rationale that "underlie[s] the Speech or Debate Clause" "gives no support to the grant of a privilege to state legislators"); *see also supra* Section II.C.2.a.iii.

[668] *Compare, e.g.*, *Hubbard*, 803 F.3d at 1310 & n.11 (concluding that it's proper to rely on federal legislative privilege cases for propositions about the state legislative privilege because "state lawmakers possess a legislative privilege that is 'similar in origin and rationale to that accorded Congressmen under the Speech or Debate Clause'" (quoting *Supreme Court of Virginia*, 446 U.S. at 732)), *with, e.g.*, *Bryant*, 2017 WL 6520967, at *9 n.10 ("*Hubbard* does not recognize a distinction

Until a higher tribunal answers those questions, however, judges in this Circuit will just have to do their best to address those issues themselves.

SIGNED this 30th day of April 2024.



DAVID C. GUADERRAMA
SENIOR U.S. DISTRICT JUDGE

between the concepts of legislative privilege, legislative immunity, and the Speech and [sic] Debate Clause as applied to state legislators.").