

**IN THE CHANCERY COURT OF TENNESSEE  
FOR THE TWENTIETH JUDICIAL DISTRICT**

**AKILAH MOORE,  
TELISE TURNER, and  
GARY WYGANT,**

*Plaintiffs,*

**v.**

**BILL LEE, Governor,  
TRE HARGETT, Secretary of State,  
MARK GOINS, Tennessee Coordinator  
of Elections; all in their official  
capacity only,**

*Defendants.*

**CASE NO. 22-0287-IV**

**THREE-JUDGE PANEL  
CHANCELLOR PERKINS, CHIEF  
CHANCELLOR MARONEY  
CIRCUIT JUDGE SHARP**

**PLAINTIFFS' FIRST SET OF INTERROGATORIES TO DEFENDANTS**

Plaintiffs Akilah Moore, Telise Turner, and Gary Wygant (“Plaintiffs”) hereby serve the following Interrogatories on Defendants Bill Lee, Tre Hargett, and Mark Goins, in their official capacity only (“Defendants”). Pursuant to Tennessee Rules of Civil Procedure 26 and 33, Defendants should serve their sworn, written Responses to the following Interrogatories upon counsel for Plaintiffs within 30 days of service.

To the extent Defendants object to any portion of the following Interrogatories and refrain from answering as a result of the objection(s), Defendants should still answer any and all portions of the Interrogatories to which Defendants do not object.

**DEFINITIONS**

For the purposes of these Interrogatories:

1. “The 2022 Reapportionment” shall mean the decennial reapportionment of the Tennessee Senate and House of Representatives that took place beginning with the United States

Census Bureau’s release of the 2020 United States Census and culminating with the enactment of Senate Bill 0779, Pub. Chap. 598, and the enactment of Senate Bill 0780, Pub. Chap. 596.

2. “SB 0779” shall refer to Public Chapter 598, that being the enacted legislation that created the reapportioned map of the Tennessee House of Representatives in effect beginning with the 2022 state legislative election cycle.

3. “SB 0780” shall refer to Public Chapter 596, that being the enacted legislation that created the reapportioned map of the Tennessee Senate in effect beginning with the 2022 state legislative election cycle.

4. “Communications” shall mean any form of written communication, including emails, texts, letters, memoranda, digital messages, social media communications, or any other means of written communication.

5. “Identify” used in reference to an individual person means to state his or her full name, present home address, including street name and number, city and state, current contact phone number, and present or last position of employment. “Identify” used in reference to a business entity means to state its full name and last known business address. “Identify” used in reference to a document means to state its date, author, subject matter, recipient, present location and custodian and to describe the type of document.

6. “Document” includes, but is not limited to, any writings, drawings, graphs, charts, photographs, telephone records, notes, diaries, schedules, calendars, tape recordings, computer records or other data compilations, including electronic data and e-mails, from which information can be obtained. “Document” further refers to any digital maps, draft maps, or mapping-related data used or considered as part of the 2022 Reapportionment, whether stored on State of Tennessee computers or with a third party vendor or provider.

7. These interrogatories are continuing, and you are requested to provide, by way of supplementary answers, such additional information as you or any other person acting on your behalf may hereafter obtain, which will augment or otherwise modify your answers now given to the interrogatories. Such supplementary answers should be served upon the undersigned within 30 days after receipt of the information.

## **INTERROGATORIES**

### **INTERROGATORY NO. 1**

Identify the individual or individuals who drew the redistricting maps, and prior drafts, that ultimately became the map enacted by SB 0779. This Interrogatory seeks the identity of any and all of the individuals who worked with demographic data, software, and / or a mapping application, or otherwise, to undertake the actual, technical process of creating the map and its prior draft.

**RESPONSE:**

### **INTERROGATORY NO. 2**

Identify the individual or individuals who drew the redistricting maps, and prior drafts, that ultimately became the map enacted by SB 0780. This Interrogatory seeks the identity of any and all of the individuals who worked with demographic data, software, and / or a mapping application, or otherwise, to undertake the actual, technical process of creating the map and its prior draft.

**RESPONSE:**

**INTERROGATORY NO. 3**

If any organization participated in the process of drawing the House redistricting map, and prior drafts, that ultimately became the map enacted by SB 0779, identify the organization or organizations and identify the primary contact person at each organization and the primary contact person at the State, whether an elected official or a legislative staff member.

**RESPONSE:**

**INTERROGATORY NO. 4**

If any organization participated in the process of drawing the Senate redistricting map, and prior drafts, that ultimately became the map enacted by SB 0780, identify the organization or organizations and identify the primary contact person at each organization and the primary contact person at the State, whether an elected official or a legislative staff member.

**RESPONSE:**

**INTERROGATORY NO. 5**

Identify the software or mapping application the creators of the map that was ultimately enacted via SB 0779 used to create the map and prior drafts of the map.

**RESPONSE:**

**INTERROGATORY NO. 6**

Identify the software or mapping application the creators of the map that was ultimately enacted via SB 0780 used to create the map and prior drafts of the map.

**RESPONSE:**

**INTERROGATORY NO. 7**

Identify all individuals on whom Defendants intend to rely, or may rely, to proffer evidence in defense of Plaintiffs' claims in this Action, giving a brief synopsis of the testimony you expect to elicit from each..

**RESPONSE:**

**INTERROGATORY NO. 8**

Describe the process by which the General Assembly completed the reapportionment of the Tennessee House of Representatives during the 2022 reapportionment, beginning with the receipt of the 2020 Census from the United States Census Bureau and continuing through the enactment of SB 0779. This response should identify all steps in the process of reapportionment the House of Representatives and should identify any individuals or organizations who took part in the process.

**RESPONSE:**

**INTERROGATORY NO. 9**

Describe the process by which the General Assembly completed the reapportionment of the Tennessee Senate during the 2022 reapportionment, beginning with the receipt of the 2020 Census from the United States Census Bureau and continuing through the enactment of SB 0780. This response should identify all steps in the process of reapportionment the Senate and should identify any individuals or organizations who took part in the process.

**RESPONSE:**

#### **INTERROGATORY NO. 10**

Identify any individuals who were involved with the 2022 Reapportionment not identified in response to the above Interrogatories and excluding the members of the House Select Committee on Redistricting and the Senate Ad Hoc Committee on Redistricting. If any legislator other than the members of the House Select Committee on Redistricting and the members of the Senate Ad Hoc Committee on Redistricting was involved in the 2022 Reapportionment beyond voting on SB 779, SB 0780, and related amendments, include such individual legislators in this response.

#### **RESPONSE:**

#### **INTERROGATORY NO. 11**

Identify all public meetings that took place to solicit input from the public about the 2022 Reapportionment, including identifying the timing, location, and legislator participants.

#### **RESPONSE:**

#### **INTERROGATORY NO. 12**

Identify all statements or communications during the 2022 Reapportionment by Tennessee legislators, or legislative staff, or third parties who assisted in the reapportionment process concerning the consecutive numbering provision of the Tennessee Constitution, meaning the portion of Article II, Section 3 requiring, “In a county having more than one senatorial district, the district shall be numbered consecutively.”

#### **RESPONSE:**

**INTERROGATORY NO. 13**

Identify all statements or communications during the 2022 Reapportionment by Tennessee legislators, or legislative staff, or third parties who assisted in the reapportionment process concerning the creation of county-dividing districts and / or the division of counties in the House reapportionment map.

**RESPONSE:**

**INTERROGATORY NO. 14**

Identify all statements or communications during the 2022 Reapportionment by Tennessee legislators, or legislative staff, or third parties who assisted in the reapportionment process concerning the decision to divide Gibson County between two House districts in the redistricting map enacted by SB 0779.

**RESPONSE:**

**INTERROGATORY NO. 15**

Identify all statements or communications during the 2022 Reapportionment by Tennessee legislators, or legislative staff, or third parties who assisted in the reapportionment process concerning the decision to create 13 House districts in Shelby County and / or the decision not to create 14 House districts in Shelby County in the redistricting map enacted by SB 0779.

**RESPONSE:**

**INTERROGATORY NO. 16**

Identify all statements or communications during the 2022 Reapportionment by Tennessee legislators, or legislative staff, or third parties who assisted in the reapportionment process concerning the Voting Rights Act of 1965, including statements or communications concerning efforts to comply with the Voting Rights Act of 1965 or the Act's effect on the 2022 Reapportionment.

**RESPONSE:**

**INTERROGATORY NO. 17**

With respect to all witnesses whom you will or may call as experts in this case, please state the following:

- (a) The witness's name and address;
- (b) The field in which the witness is to be offered as an expert;
- (c) A summary of the witness's qualifications within the field in which the witness will opine;
- (d) The substance of the facts to which the witness is expected to testify;
- (e) The substance of the opinions to which the witness is expected to testify and a summary of the ground for each such opinion;
- (f) The date when each expert was first contacted;
- (g) The date when each expert was formally retained to serve in any capacity in this case; and
- (h) The date when each expert was sent any records or materials in this case.

**RESPONSE:**



Dated: June 2, 2022

Respectfully submitted,

/s/ Scott P Tift

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*Counsel for Plaintiffs*

**CERTIFICATE OF SERVICE**

I hereby certify that a true and exact copy of the foregoing *Plaintiffs' First Set of Interrogatories to Defendants* has been served on the following counsel for the defendants via electronic and U.S. mail on this 2nd day of June, 2022.

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I hereby certify that a true and exact copy of the foregoing *Plaintiffs' First Set of Interrogatories to Defendants* has been served on the following counsel for the defendants via electronic mail on this 2nd day of June, 2022.

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/s/ Scott P Tift  
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