

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

DAMON JOHNSON, TREASURE
SMITH, and THE PANTHER PARTY,

Plaintiffs,

v.

WALLER COUNTY, TEXAS; et al.,

Defendants.

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CIVIL ACTION NO. 4:18-cv-3985-CRE

JUDGE CHARLES ESKRIDGE

AMENDED TRIAL EXHIBIT LIST OF PLAINTIFFS

No.	Description	Offer	Object	Date Admit	Date N/Adm
1.	License Agreement for Polling Location betw. PVAMU & Waller Co, TX to use MSC for 2014 elections (PLS000341-342)				
2.	License Agreement for Polling Location betw. PVAMU & Waller Co, TX to use MSC for 2016 elections (PLS000343-345)				
3.	Waller County Early Voting by Personal Appearance, October 20, 2014-October 31, 2014 (DEFENDANTS000154)				
4.	Waller County Early Voting Locations and Hours, March 1, 2016 Primaries (DEFENDANTS000057)				
5.	Corrected Proposed Waller County Early Voting Locations and Hours, March 1, 2016 (DEFENDANTS001166)				

No.	Description	Offer	Object	Date Admit	Date N/Adm
6.	Waller County Early Voting Locations, November 8, 2016 (DEFENDANTS000064)				
7.	Order of General Election, Nov. 8, 2016 (DEFENDANTS000071)				
8.	Early Voting and Election Day Polling Places, November 2017 General Election (DEFENDANTS000074)				
9.	Early Voting and Election Day Polling Places, November 2017 General Election Constitutional Amendment, Jail Bond (DEFENDANTS000091, DEFENDANTS000097-101)				
10.	Order of Special Election, November 7, 2017 (DEFENDANTS000080-88)				
11.	Early Voting and Election Day Polling Places, 2018 General Election, November 6, 2018 (DEFENDANTS000131) (ECF 71-1)				
12.	(Initial, pre-lawsuit) Early Voting Locations (DEFENDANTS000158) (ECF 71-1)				
13.	Email cover letter from Christy Eason w/ 2019 Special Election ED and EV Polling Locations (DEFENDANTS002625-2626)				
14.	2020 Joint Primary Election Waller County Early Voting Locations (https://www.co.waller.tx.us/page/open/2562/0/2020%20PRIMARY%20EV%20AND%20ED%20Locations.pdf)				

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15.	2020 Joint Primary Runoff Election Waller County Early Voting Locations (https://www.co.waller.tx.us/page/open/2562/0/2020%20PRIMARY%20RUNOFF%20EV%20AND%20ED.pdf)				
16.	Verity Equipment Assignment 2018 General Election (ECF 73-2)				
17.	PVAMU Shuttle Schedule (PLS000329-337)				
18.	Waller County, Texas Democratic Primary Canvass Report, dated March 6, 2018 (ECFs 17-10 & 73-2)				
19.	Waller County, Texas Republican Primary Canvass Report, dated March 6, 2018 (ECFs 17-10 & 73-2)				
20.	Email cover letter from Christy Eason w/ Waller County, Texas General Canvass Report, November 6, 2018 (DEFENDANTS002548- 2624)				
21.	2010 Economic Impact of Prairie View A&M on Waller County (https://www.pvamu.edu/reports/wp-content/uploads/sites/112/PV-Economic-Impact-2010.pdf)				
22.	2012 Economic Impact of Prairie View A&M on Waller County (http://www.pvamu.edu/reports/wp-content/uploads/sites/112/pv-economic-impact-2012.pdf)				
23.	Declaration of Frank Jackson, December 19, 2019 (ECF 77-1)				
24.	Declaration of Valerie Gibson, October 22, 2018 (ECF 17-2)				

No.	Description	Offer	Object	Date Admit	Date N/Adm
25.	Declaration of Jayla Allen, dated October 22, 2018 (ECF 17-5)				
26.	Declaration of Damon Johnson, dated October 22, 2018 (ECF 17-6)				
27.	Declaration of Joshua Muhammad, dated October 22, 2018 (ECF 17-7)				
28.	Declaration of Raul Sanchez, dated October 22, 2018 (ECF 17-8)				
29.	Declaration of Treasure Smith, dated October 21, 2018 (ECF 17-9)				
37.	The Panther Party Constitution and ByLaws (PLS000319-323)				
38.	Certificate of Filing of The Panther Party (PLS000317)				
44.	Appendices for the Waller County Comprehensive Strategic Plan, https://www.co.waller.tx.us/upload/page/0110/docs/appendices_booklet_7.26.pdf				
59.	Damon Johnson's 2018 Course Schedule (PLS000004)				
61.	Treasure Smith 2018 Course Schedule (PLS000327-328)				
63.	Panther Party Membership (PLS000318)				
64.	The Panther Party October 17, 2018 Meeting Minutes (PLS000338-340)				
66.	Jayla Allen 2018 Course Schedule (PLS000148)				

No.	Description	Offer	Object	Date Admit	Date N/Adm
67.	Resolution No. R2019-0812-001, Prairie View City Council Resolution, A Resolution of the City of Prairie View, Texas, Supporting the Realigning of Postal Zip Code Boundaries to Include All of the City of Prairie View, Texas, Under One Zip Code				
68.	Ltr. from Leah Aden, NAACP LDF to District Manager David Camp, US PS re: Requesting Zip Code Boundary Review for Prairie View, Texas, dated August 28, 2019				
69.	Email from Dan Teed, former Elections Administrator, March 19, 2015 (DEFENDANTS001157-58)				
70.	Email to/from Dan Teed and Judge Duhon, December 17, 2015 (DEFENDANTS001416-1418)				
71.	Email & attached letter to Judge Duhon and Dan Teed, former Elections Administrator, from Gerald Hebert, Campaign Legal Center, December 22, 2015 (DEFENDANTS001422-1425) (ECF 17-5)				
72.	Email to/from Dan Teed & Judge Duhon, December 22, 2015 (DEFENDANTS01426-1430)				
73.	Email to/from Dan Teed and Denise Mattox, December 25, 2015 (DEFENDANTS001431-1436)				
74.	Email Chain January 13-14, 2016 (DEFENDANTS001445-1446)				

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75.	Email Chain to/from Dan Teed and Alisha Lowe, PVAMU, January 11-15, 2016 (DEFENDANTS001450-1453)				
76.	Email Chain to/from Dan Teed & Judge Duhon, January 19, 2016 (DEFENDANTS001457-1458)				
77.	Email from Rosa Harris to Commissioners and other officials, January 21, 2016 (DEFENDANTS0001336)				
79.	Email to/from Commissioner Jeron Barnett and Alisha Lowe, PVAMU, January 22, 2016 (DEFENDANTS001653)				
80.	E-mail from Dan Teed to Jeron Barnett and Trey Duhon w/ "3 Location Possibilities on PVAMU" Report, January 26, 2016 (DEFENDANTS001481-1486)				
81.	Email Chain to/from Dan Teed and Judge Duhon, August 2, 2016 (DEFENDANTS001341-1342)				
82.	Email Chain to/from Christy Eason, Elections Administrator & Rosa Harris, October 2-4, 2017 (DEFENDANTS001352-1374)				
83.	Email Chain to/From Christy Eason, Elections Administrator, January 7-8, 2018 (DEFENDANTS001255-1257)				
84.	Email to/from Christy Eason and Trey Duhon, January 19, 2018 (DEFENDANTS001258-1260)				

No.	Description	Offer	Object	Date Admit	Date N/Adm
85.	Email to/from Christy Eason, Elections Administrator, to Judge Duhon, January 19, 2018 (DEFENDANTS001604-1608)				
86.	Email to Judge Duhon from Christy Eason, Elections Administrator, January 23, 2018 (DEFENDANTS001266)				
87.	Email cover letter to/from Elizabeth Dorsey & Judge Duhon & attached Verity Master Agreement (DEFENDANTS001545-1562)				
88.	Email Chain to/from Christy Eason, Elections Administrator, & Garrett Nemec, March 1-5, 2018 (DEFENDANTS001300-1303)				
89.	Email Chain to/from PV Councilman Xante' Wallace & Judge Duhon, December 19, 2018 (DEFENDANTS001664-1675)				
90.	Tex. H.B. 1888, 86th Leg. R.S. (2019) (ECF 73-1)				
91.	Letter from J. Stanley Pottinger, Assistant Attorney General, U.S. Dep't of Justice, Civil Rights Div., to Counsel for the Commissioners of Waller County, Texas, dated July 27, 1976 (ECF 17-12)				
92.	Letter from Drew S. Days III, Assistant Attorney General, U.S. Dep't of Justice, Civil Rights Div., to Counsel for the Commissioners of Waller County, Texas, dated March 10, 1978 (ECF 17-13)				

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93.	Letter from J. Michael Wiggins, Acting Assistant Attorney General, U.S. Dep't of Justice, Civil Rights Div., to Counsel for the Commissioners of Waller County, Texas dated June 21, 2002 (ECF 17-14)				
94.	Letter from Priscilla Barbour, PVAMU SGA President to County Judge Glenn Beckendorff Dated July 25, 2013				
95.	Email cover letter w/ Ltr. from Jocolahn Dudley, PVAMU SGA President to election officials, dated January 21-22, 2016 (DEFENDANTS001475-1477)				
96.	Email cover letters & Letter dated October 30, 2018 to/from SOS Pablos to Judge Duhon & Commissioners (DEFENDANTS001511-1517)				
97.	Minutes of the Waller County Commissioners Court Regular Session, January 4, 2012 (DEFENDANTS000343-348)				
98.	Notice of the Waller County Commissioners Court Special Session, November 25, 2014 (DEFENDANTS000766-770)				
99.	Notice of Meeting of Commissioners Court, January 21, 2015 (DEFENDANTS000787-794)				
100.	Minutes of Commissioners Court of Waller County, Texas, February 4, 2015 (DEFENDANTS000794-807)				

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101.	Notice of Meeting of Commissioners Court of Waller County, Texas, & Meeting Minutes of the Commissioners Court, Regular Session, April 15, 2015 (DEFENDANTS000874-886)				
102.	Minutes of the Waller County Commissioners Court Regular Session, August 5, 2015 (DEFENDANTS000040-45)				
103.	Video of August 5, 2015 Commissioners Court Hearing (DEFENDANTS000637)				
104.	Minutes of the Waller County Commissioners Court Regular Session, December 16, 2015 (DEFENDANTS000979-986)				
105.	Minutes of the Waller County Commissioners Court Regular Session, December 23, 2015 (DEFENDANTS00993-998)				
106.	Minutes of Waller County Commissioners Court January 20, 2016 (DEFENDANTS000052-56) (ECF 17-6)				
107.	Video of January 20, 2016 Commissioners Court hearing (DEFENDANTS000639)				
108.	Minutes of Waller County Commissioners Court, Regular Session, January 27, 2016 (DEFENDANTS00058-63)				
109.	Video of January 27, 2016 Commissioners Court hearing (DEFENDANTS000640)				

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110.	Minutes of Waller County Commissioners Court of Waller County, Texas, March 23, 2016 (DEFENDANTS0001318-1321)				
111.	Notice of Mtg. & Minutes of Commissioners Court November 22, 2016 w/ 11/8/16 Official Canvass Results (DEFENDANTS001025-1053)				
112.	Minutes of Waller County Commissioners Court October 11, 2017 (DEFENDANTS000098-101)				
113.	Video of October 11, 2017 Commissioners Court , https://www.co.waller.tx.us/page/comm.WCCCVideo				
114.	Minutes of Waller County Commissioners Court Mtg, August 22, 2018 (DEFENDANTS000132-135)				
115.	Video of August 22, 2018 Commissioners Court Hearing (DEFENDANTS000695)				
116.	Minutes of Waller County Commissioners Court Mtg, September 5, 2018 https://www.co.waller.tx.us/page/C.C.Minutes (ECF 73-2)				
117.	Waller County Commissioners Court Agenda, September 5, 2018 https://www.co.waller.tx.us/page/C.C.Minutes (ECF 73-2)				

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118.	Waller County Commissioners Court Agenda Backup, September 5, 2018 https://www.co.waller.tx.us/page/C.C.Minutes (ECF 73-2)				
119.	Video Waller County Commissioners Court Hearing, September 5, 2018) https://wallercountytexas.swagit.com/play/09052018-654 (ECF 73-2)				
120.	Notice & Mtg. Minutes of Meeting of Commissioners Court of Waller County, Texas, September 19, 2018 (DEFENDANTS001054-1065)				
121.	Minutes Waller County Commissioner's Court Regular Session, September 26, 2018 (DEFENDANTS000136-141)				
122.	Video of September 26, 2018 Commissioners Court Hearing (DEFENDANTS00706)				
123.	Minutes Waller County Commissioner's Court Regular Session, October 10, 2018 (DEFENDANTS000142-146)				
124.	Video of October 10, 2018 Commissioners Court Hearing (DEFENDANTS000723)				
125.	Minutes of the Waller County Commissioners Court Regular Session, Wednesday, October 17, 2018 (DEFENDANTS001070-1074)				
126.	Video of Commissioners Court, October 17, 2018 https://wallercountytexas.swagit.com/play/10172018-1225 (ECF 73-2)				

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127.	Minutes of the Waller County Commissioners Court Emergency Session, Wednesday, October 24, 2018 (DEFENDANTS001077-1078)				
128.	Video of October 24, 2018 Commissioners Court Emergency Hearing https://wallercountytexas.gov/record/play/10242018-1502 (ECF 73-2)				
129.	Oliver S. Kitzman, Letter to the Editor, at 2, Waller Times, November 10, 2003 (PLS000372-381)				
130.	Prairie View students file another voting rights lawsuit, Juan A. Lozano, MyPlainview, February 16, 2004 (https://www.mypainview.com/news/article/Prairie-View-students-file-another-voting-rights-8814873.php)				
131.	Barnett is candidate for Waller County sheriff, Houston Chronicle, January 2, 2008 (https://www.chron.com/neighborhood/article/Barnett-is-candidate-for-Waller-County-sheriff-9360926.php)				
132.	1,000 Prairie View students march for voting rights, Helen Eriksen, Houston Chronicle, February 19, 2008 (https://www.chron.com/news/houston-texas/article/1-000-Prairie-View-students-march-for-voting-1647555.php)				

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133.	Burial Exposes Racial Rift in Texas, Steve Friess, NYTimes, July 5, 2008 (https://www.nytimes.com/2008/07/05/us/05race.html)				
134.	Waller County Sherriff's Race: Grenades & Gun-Toting Campaign Managers, Paul Knight, October 24, 2008 (https://www.houstonpress.com/news/waller-county-sheriffs-race-grenades-and-gun-toting-campaign-managers-6728447)				
135.	One Texas School's Long Walk of Political Engagement, PBS NewsHour, November 5, 2012 (https://www.pbs.org/newshour/politics/picture-this-more-than-1000)				
136.	Student Leader Demands On-Campus Polling Place, Reeve Hamilton, July 31, 2013, Texas Tribune (PLS000174-176)				
137.	Prairie View A&M student fights for voting rights on campus, Renee C. Lee, Houston Chronicle, July 31, 2013 (https://www.pbs.org/newshour/politics/picture-this-more-than-1000)				
138.	Changes debated in early voting locations for March 1 Primary, Carrie Prazak-Gourley, Waller Times, December 23, 2015				
139.	Emily Foxhall, Waller County backs off plan to limit early voting, Hous. Chron., January 5 2016 (ECF 17-6)				
140.	Contentious Court tables PV campus poll location addition, Carrie Prazak-Gourley, Waller Times, January 7, 2016				

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141.	Waller County puts off decision on campus early-voting site, Emily Foxhall, Houston Chronicle, January 20, 2016 (https://www.houstonchronicle.com/news/houston-texas/houston/article/Waller-County-puts-off-decision-on-campus-6772974.php)				
142.	Texas county where Sandra Bland died may elect first black sherriff, Nicole Cobler & Neena Satija, Texas Tribune, November 5, 2016 (https://www.texastribune.org/2016/11/05/eyes-waller-county-sheriffs-election-wake-sandra-b/)				
143.	The Interview: Frank Jackson, Patrick Michels, Texas Observer, June 20, 2016 (https://www.texasobserver.org/prairie-view-mayor-frank-jackson-interview/)				
144.	Prairie View Students See Long Lines as Waller County May Elect First Black Sheriff, Patrick Michels, Tex. Observer, November 8, 2016 (https://www.texasobserver.org/election-day-2016-prairie-view/) (ECF 17-17)				
145.	This Texas City Just Elected the Youngest City Council Member in the State, the Nation, Jae Jones, June 1, 2017 (https://www.thenation.com/article/archive/texas-city-just-elected-youngest-person-hold-office-state/)				

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146.	All we want to do is vote: Prairie View A&M students seek on-campus early voting sites during first week, Jasper Scherer, Texas Chron, October 24, 2018 (https://www.chron.com/news/houston-texas/houston/article/All-we-want-to-do-is-vote-Prairie-View-A-M-13334253.php)				
147.	Fighting for the Right to Vote in a Tiny Texas County, Vann R. Newkirk II and Adam Harris, Atlantic, November 1, 2018 (PLS000150-157)				
148.	Once Again, Voting Controversies Surface at Prairie View, Pavement Pieces, Kerry Breen, November 2, 2018 (https://pavementpieces.com/once-again-voting-controversies-surface-at-prairie-view-am/)				
149.	They Don't Really Want Us to Vote: How Republicans Made It Harder, Danny Hakim and Michael Wines, November 3, 2018 (PLS000158-163)				
150.	On Election Day, Students Rally for Voting Rights at Texas' Oldest HBCU, Michael Barajas, Texas Observer, November 6, 2018 (PLS000164-173)				

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151.	In rural Texas, black students fight for voting access conjures a painful past, Amy Gardner, Washington Post, Sept. 24, 2019 (https://www.washingtonpost.com/politics/in-rural-texas-black-students-fight-for-voting-access-conjures-a-painful-past/2019/09/24/fa18e880-ca69-11e9-a1fe-ca46e8d573c0_story.html)				
152.	Cover Email to Dr. Simmons/PVAMU and Judge Duhon with attached Press Release, Trey Duhon, Waller County Judge, & Christy Eason, Waller County Elections Administrator, October 12, 2018 (DEFENDANTS001654-59)				
153.	Declaration of William S. Cooper (w/ CV & attachments) (ECF 77-1)				
154.	Supplemental Declaration of William S. Cooper (w/ attachments) (ECF 77-1)				
155.	Expert Report of Peniel Joseph, Ph.D. (w/ CV & attachments) (ECF 77-1)				
156.	Expert Report of Henry Flores, Ph.D. (w/ CV & attachments) (ECF 77-1)				
157.	Expert Rebuttal Report of Henry Flores, Ph.D. (ECF 77-1)				
158.	Expert Report of Robert Stein, Ph.D. (w/ CV & attachments)				
159.	Expert Rebuttal Report of Robert Stein, Ph.D. (ECF 77-1)				

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160.	Errata to July 19, 2019 Expert Report of Dr. Robert Stein, Ph.D.				
161.	Expert Report of Dr. James G. Gimpel w/ CV as attachments				
162.	Political Participation and the Accessibility of the Ballot Box by Gimpel and Shupnick				
163.	Jayla Allen Twitter Feed Dated October-November 2018 (PLS000013-20; PLS000030-32; PLS000035; PLS000039-41; PLS000044-45; PLS000047-52; PLS000058; PLS000068; PLS000079-81; PLS000085-97; PLS000099; PLS000102-105; PLS000107; PLS000116-117; PLS000264-267)				
164.	Panther Party Twitter Feed Dated March 2017; October 2017; November 2017; February 2018; March 2018; April 2018; August-November 2018 (PLS000182-185; PLS000190; PLS000193-95; PLS000200-201; PLS000205; PLS000212-214; PLS000220-222; PLS000224-225; PLS000227-229; PLS000237-248; PLS000251-PLS263; PLS268-278; PLS000281; PLS000300; PLS000304-310; PLS000341-371)				
166.	Texas Secretary of State's "November 6, 2018 Election Law Calendar", https://www.sos.state.tx.us/elections/forms/November-6-2018-Calendar.pdf				
167.	Parties Stipulated Facts				

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168.	December 17, 2015 email chain from B. Tibbs (Defendants 001416-17)				
169.	February 28, 2018 email chain from Christy Eason (Defendants 001488-96)				
170.	March 5, 2018 email from Christy Eason to Gary Nemec (Defendants 001493)				
171	Agenda of the Waller County Commissioners Court Regular Session, August 5, 2020, https://www.co.waller.tx.us/upload/template/0461/docs/2020CC/Agenda%20080520.pdf				
172	Minutes of the Waller County Commissioners Court Regular Session, August 5, 2020				
173	Video of the Waller County Commissioners Court Regular Session, August 5, 2020, http://wallercountytexas.swagit.com/play/08052020-691				
174	Agenda of the Waller County Commissioners Court Regular Session, August 12, 2020, https://www.co.waller.tx.us/upload/template/0461/docs/2020CC/Agenda%20081220%20Payroll.pdf				
175	Minutes of the Waller County Commissioners Court Regular Session, August 12, 2020				
176	Video of the Waller County Commissioners Court Regular Session, August 12, 2020, http://wallercountytexas.swagit.com/play/08122020-1231				

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177	Agenda of the Waller County Commissioners Court Regular Session, August 19, 2020, https://www.co.waller.tx.us/upload/template/0461/docs/2020CC/Agenda%2081920.pdf				
178	Minutes of the Waller County Commissioners Court Regular Session, August 19, 2020				
179	Video of the Waller County Commissioners Court Regular Session, August 19, 2020, http://wallercountytexas.swagit.com/play/08192020-1109				
180	Agenda of the Waller County Commissioners Court Regular Session, September 2, 2020, https://www.co.waller.tx.us/upload/template/0461/docs/2020CC/Agenda%20090220%20Amended2.pdf				
181	Minutes of the Waller County Commissioners Court Regular Session, September 2, 2020				
182	Video of the Waller County Commissioners Court Regular Session, September 2, 2020, https://wallercountytexas.swagit.com/play/09022020-770				

Respectfully submitted on September 17, 2020,

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