



3. Alexandra Gibbs  
2303 Tidwell, Apt. 2103  
Houston, TX 77091

Plaintiff.

4. Bonie Sue Leszczuk  
8600 S. Course Dr.  
Houston, TX 77099

Plaintiff.

5. Jeffrey T. Vanschoonhoven  
614 Marshall, Apt. 5  
Houston, TX 77006

Plaintiff.

6. Gerald Birnberg  
Chairman of the Harris County Democratic Party  
1445 North Loop West, Suite 110  
Houston, TX 77008

Plaintiff.

7. J. Goodwille Pierre  
16106 Cairngorm Ave.  
Houston, TX 77095

Plaintiff.

8. Paul Bettencourt  
Harris County Tax Assessor Collector and Voter Registrar  
1001 Preston  
Houston, TX 77002

Defendant.

9. George Hammerlein  
Harris County Tax Assessor Collector and Voter Registrar's Office  
1001 Preston  
Houston, TX 77002

This person likely has information concerning the policies and procedures of the Harris County Voter Registrar and the general matters that are the subject of this lawsuit.

10. **Chris German**  
Harris County Tax Assessor Collector and Voter Registrar's Office  
1001 Preston  
Houston, TX 77002

This person likely has information concerning the policies and procedures of the Harris County Voter Registrar and the general matters that are the subject of this lawsuit.

11. **Ed Johnson**  
Harris County Tax Assessor Collector and Voter Registrar's Office  
1001 Preston  
Houston, TX 77002

This person likely has information concerning the policies and procedures of the Harris County Voter Registrar and the general matters that are the subject of this lawsuit.

12. **Johnnie German**  
Harris County Clerk's Office  
201 Caroline, Fourth Floor  
Houston, TX 77002

This person likely has information concerning the handling and processing of provisional ballots and provisional ballot affidavits.

13. **Ann McGeehan**  
Director of Elections  
Texas Secretary of State's Office.  
208 E. 10<sup>th</sup> Street, Third Floor  
Austin, TX 78711-2887

This person likely has information concerning the general matters that are the subject of this lawsuit.

14. **Pamala Ritchie**  
Harris County Tax Assessor Collector and Voter Registrar's Office  
1001 Preston  
Houston, TX 77002

This person likely has information concerning the policies and procedures of the Harris County Voter Registrar and the general matters that are the subject of this lawsuit.

15. **Elizabeth Hernandez**  
Harris County Tax Assessor Collector and Voter Registrar's Office  
1001 Preston  
Houston, TX 77002

This person likely has information concerning the policies and procedures of the Harris County Voter Registrar and the general matters that are the subject of this lawsuit.

16. Michelle Dixon  
Harris County Tax Assessor Collector and Voter Registrar's Office  
1001 Preston  
Houston, TX 77002

This person likely has information concerning the policies and procedures of the Harris County Voter Registrar and the general matters that are the subject of this lawsuit.

17. Mary Francis Thurman  
Harris County Tax Assessor Collector and Voter Registrar's Office  
1001 Preston  
Houston, TX 77002

This person likely has information concerning the policies and procedures of the Harris County Voter Registrar and the general matters that are the subject of this lawsuit.

18. Leo Vasquez  
Harris County Tax Assessor Collector and Voter Registrar's Office  
1001 Preston  
Houston, TX 77002

This person likely has information concerning the policies and procedures of the Harris County Voter Registrar and the general matters that are the subject of this lawsuit.

19. Beverly Kaufman  
Harris County Clerk  
201 Caroline, Fourth Floor  
Houston, TX 77002

This person likely has information concerning the process of elections generally and processing of provisional ballots and provisional ballot affidavits.

- (2) **FED. R. CIV. P. 26 (a)(1)(A)(ii): Description of Documents by Category that the Disclosing Party May Use to Support its Defenses:**
1. Relevant documents including Texas Voter Registration Applications and Affidavits for Provisional Ballot; see documents already produced.
- (3) **FED. R. CIV. P. 26 (a)(1)(A)(iii):**  
Not applicable.
- (4) **FED. R. CIV. P. 26 (a)(1)(A)(iv):**  
Not applicable.

Respectfully submitted,

OF COUNSEL:

VINCE RYAN  
County Attorney  
Harris County, Texas

By /s/ F. Clinton Gambill, II  
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OF COUNSEL:

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ATTORNEYS FOR DEFENDANT

**CERTIFICATE OF SERVICE**

I hereby certify that on the 8<sup>th</sup> day of September, 2009, a true and correct copy of the foregoing pleading was served in accordance with the Federal Rules of Civil Procedure on the following:

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K. Scott Brazil  
Brazil & Dunn  
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Houston, TX 77068

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Preis & Roy  
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24 Greenway Plaza, Suite 2050  
Houston, TX 77046

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