

Ex. 6

Ryan, Elizabeth (CRT)

From: Strach, Phillip J. [Phil.Strach@ogletreedeakins.com]
Sent: Tuesday, March 04, 2014 10:20 PM
To: O'Connor, Bridget K.
Cc: Ryan, Elizabeth (CRT); Pocklington, Amy M.; Farr, Thomas A.; Peters, Alec; butch@butchbowers.com; Allison Riggs; Anita Earls; *AStein@tinfulton.com; bob.stephens@nc.gov; cbrook@acluofnc.org; dale.ho@aclu.org; Cooper, David (CRT); Donovan, Daniel T.; *dlieberman@advancementproject.org; Beck, Gill (USANCW); *ijoyner@NCCU.EDU; jebenstein@aclu.org; Rancour, Kimberly D.; lmcdonald@aclu.org; *phair@advancementproject.org; Fisher, Spencer (CRT); Yannucci, Thomas D.; Allen, Winn; Russ, John (CRT); JDevaney@perkinscoie.com; melias@perkinscoie.com; efrost@perkinscoie.com; Meza, Catherine (CRT)
Subject: RE: Meet and Confer

Bridget:

My understanding is that the data will be transferred from Ogletree's Relativity team to Kirkland's Relativity team within Iris' environment. Because of technical issues the transfer will occur in three stages:

- First 20,000 will be in plaintiffs' Relativity workspace first thing tomorrow morning;
- Second batch will be uploaded end of day tomorrow; and
- Remaining will be uploaded Thursday morning

I also understand that there will be 149,140 email and attachments (after having been deduped in Relativity) being transferred to the Kirkland workspace with 11,621 email and attachments (also having been deduped in Relativity) being withheld per the clawback agreement.

Regards,

Phillip J. Strach | Ogletree, Deakins, Nash, Smoak & Stewart, P.C.

4208 Six Forks Road, Suite 1100 | Raleigh, NC 27609 | Telephone: 919-789-3179 | Fax: 919-783-9412

phil.strach@ogletreedeakins.com | www.ogletreedeakins.com

From: O'Connor, Bridget K. [mailto:boconnor@kirkland.com]
Sent: Tuesday, March 04, 2014 4:58 PM
To: Strach, Phillip J.
Cc: Ryan, Elizabeth (CRT); Pocklington, Amy M.; Farr, Thomas A.; Peters, Alec; butch@butchbowers.com; Allison Riggs; Anita Earls; *AStein@tinfulton.com; bob.stephens@nc.gov; cbrook@acluofnc.org; dale.ho@aclu.org; Cooper, David (CRT); Donovan, Daniel T.; *dlieberman@advancementproject.org; Beck, Gill (USANCW); *ijoyner@NCCU.EDU; jebenstein@aclu.org; Rancour, Kimberly D.; lmcdonald@aclu.org; *phair@advancementproject.org; Fisher, Spencer (CRT); Yannucci, Thomas D.; Allen, Winn; Russ, John (CRT); JDevaney@perkinscoie.com; melias@perkinscoie.com; efrost@perkinscoie.com; Meza, Catherine (CRT)
Subject: RE: Meet and Confer

Phil: In light of the Order entered by Judge Peake this morning, would you please confirm that Defendants have taken the steps necessary to release the documents in the SBOE Initial Review Set to Plaintiffs for us to begin our review?

Sincerely,

Bridget K. O'Connor
KIRKLAND & ELLIS LLP

655 Fifteenth Street, NW, Suite 1200
Washington, D.C. 20005
Ph: (202) 879-5048 F: (202) 879-5200

From: Strach, Phillip J. [<mailto:Phil.Strach@ogletreedeakins.com>]

Sent: Monday, March 03, 2014 5:03 PM

To: O'Connor, Bridget K.

Cc: Ryan, Elizabeth (CRT); Pocklington, Amy M.; Farr, Thomas A.; Peters, Alec; butch@butchbowers.com; Allison Riggs; Anita Earls; *AStein@tinfulton.com; bob.stephens@nc.gov; cbrook@acluofnc.org; dale.ho@aclu.org; Cooper, David (CRT); Donovan, Daniel T.; *dlieberman@advancementproject.org; Beck, Gill (USANCW); *jjoyner@NCCU.EDU; jebenstein@aclu.org; Rancour, Kimberly D.; lmcdonald@aclu.org; *phair@advancementproject.org; Fisher, Spencer (CRT); Yannucci, Thomas D.; Allen, Winn; Russ, John (CRT); JDevaney@perkinscoie.com; melias@perkinscoie.com; efrost@perkinscoie.com; Meza, Catherine (CRT)

Subject: RE: Meet and Confer

Bridget:

Thanks for your email. Defendants will be prepared to release the data once the judge enters an order but don't think it is appropriate to do so until the judge has set forth her parameters for the review. As a practical matter, we assume her order will be coming soon. However, we don't object if you'd like to call the clerk to find out the status and advise the court that the review and production are waiting on her approval.

Phil

Phillip J. Strach | Ogletree, Deakins, Nash, Smoak & Stewart, P.C.

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From: O'Connor, Bridget K. [<mailto:boconnor@kirkland.com>]

Sent: Friday, February 28, 2014 5:55 PM

To: Strach, Phillip J.

Cc: Ryan, Elizabeth (CRT); Pocklington, Amy M.; Farr, Thomas A.; Peters, Alec; butch@butchbowers.com; Allison Riggs; Anita Earls; *AStein@tinfulton.com; bob.stephens@nc.gov; cbrook@acluofnc.org; dale.ho@aclu.org; Cooper, David (CRT); Donovan, Daniel T.; *dlieberman@advancementproject.org; Beck, Gill (USANCW); *jjoyner@NCCU.EDU; jebenstein@aclu.org; Rancour, Kimberly D.; lmcdonald@aclu.org; *phair@advancementproject.org; Fisher, Spencer (CRT); Yannucci, Thomas D.; Allen, Winn; Russ, John (CRT); JDevaney@perkinscoie.com; melias@perkinscoie.com; efrost@perkinscoie.com; Meza, Catherine (CRT)

Subject: RE: Meet and Confer

Counsel: This is a note to follow up on the method of transferring the data for Plaintiffs' review of Defendants' SBOE Initial Review Set and to confirm that the Plaintiffs' groups are all in agreement that we can proceed with using the Relativity platform via the Iris vendor, as discussed on our call with the lit support professionals the other day. (Counsel for the United States are working to finalize some of the technical details as to DOJ's systems, but has asked us to proceed with the plan as we've described and discussed on the call earlier this week.) Plaintiffs ask that Defendants proceed to make the data available to Plaintiffs in anticipation of Judge Peake entering an order on the parties' Joint Proposal, and Plaintiffs agree to abide by the terms laid out in the proposal pending the entry of that order. We look forward to gaining access to that data as soon as possible in order to facilitate the review and processing of responsive materials from that set (as described in the Joint Proposal) on a timely basis.

Sincerely,

Bridget K. O'Connor

KIRKLAND & ELLIS LLP
655 Fifteenth Street, NW, Suite 1200
Washington, D.C. 20005
Ph: (202) 879-5048 F: (202) 879-5200

From: Strach, Phillip J. [<mailto:Phil.Strach@ogletreedeakins.com>]

Sent: Wednesday, February 26, 2014 5:32 PM

To: O'Connor, Bridget K.

Cc: Ryan, Elizabeth (CRT); Pocklington, Amy M.; Farr, Thomas A.; Peters, Alec; butch@butchbowers.com; Allison Riggs; Anita Earls; *AStein@tinfulton.com; bob.stephens@nc.gov; cbrook@acluofnc.org; dale.ho@aclu.org; Cooper, David (CRT); Donovan, Daniel T.; *dlieberman@advancementproject.org; Beck, Gill (USANCW); *jjoyner@NCCU.EDU; jebenstein@aclu.org; Rancour, Kimberly D.; lmcdonald@aclu.org; *phair@advancementproject.org; Fisher, Spencer (CRT); Yannucci, Thomas D.; Allen, Winn; Russ, John (CRT); JDevaney@perkinscoie.com; melias@perkinscoie.com; efrost@perkinscoie.com; Meza, Catherine (CRT)

Subject: RE: Meet and Confer

Bridget – thanks – we have no objection to the form of the filing. Phil

Phillip J. Strach | Ogletree, Deakins, Nash, Smoak & Stewart, P.C.

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From: O'Connor, Bridget K. [<mailto:boconnor@kirkland.com>]

Sent: Wednesday, February 26, 2014 5:11 PM

To: Strach, Phillip J.

Cc: Ryan, Elizabeth (CRT); Pocklington, Amy M.; Farr, Thomas A.; Peters, Alec; butch@butchbowers.com; Allison Riggs; Anita Earls; *AStein@tinfulton.com; bob.stephens@nc.gov; cbrook@acluofnc.org; dale.ho@aclu.org; Cooper, David (CRT); Donovan, Daniel T.; *dlieberman@advancementproject.org; Beck, Gill (USANCW); *jjoyner@NCCU.EDU; jebenstein@aclu.org; Rancour, Kimberly D.; lmcdonald@aclu.org; *phair@advancementproject.org; Fisher, Spencer (CRT); Yannucci, Thomas D.; Allen, Winn; Russ, John (CRT); JDevaney@perkinscoie.com; melias@perkinscoie.com; efrost@perkinscoie.com; Meza, Catherine (CRT)

Subject: RE: Meet and Confer

All: The attached is what we will plan to file by 6 PM, absent any further word from the parties. (This puts the text from the document attached to my earlier email under the case caption and with the parties' respective signature blocks underneath with today's date.)

Bridget K. O'Connor

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Ph: (202) 879-5048 F: (202) 879-5200

From: Strach, Phillip J. [<mailto:Phil.Strach@ogletreedeakins.com>]

Sent: Wednesday, February 26, 2014 3:41 PM

To: O'Connor, Bridget K.

Cc: Ryan, Elizabeth (CRT); Pocklington, Amy M.; Farr, Thomas A.; Peters, Alec; butch@butchbowers.com; Allison Riggs; Anita Earls; *AStein@tinfulton.com; bob.stephens@nc.gov; cbrook@acluofnc.org; dale.ho@aclu.org; Cooper, David (CRT); Donovan, Daniel T.; *dlieberman@advancementproject.org; Beck, Gill (USANCW); *jjoyner@NCCU.EDU; jebenstein@aclu.org; Rancour, Kimberly D.; lmcdonald@aclu.org; *phair@advancementproject.org; Fisher, Spencer (CRT); Yannucci, Thomas D.; Allen, Winn; Russ, John (CRT); JDevaney@perkinscoie.com; melias@perkinscoie.com;

efrost@perkinscoie.com; Meza, Catherine (CRT)

Subject: RE: Meet and Confer

Bridget:

We have no objection to Plaintiffs filing the joint report in the form you provided below. We assume you will simply file it as a joint report with no other pleading or commentary but if that is not the case please let us know so that we may provide input on any additional documents filed with the court.

Regards,

Phillip J. Strach | Ogletree, Deakins, Nash, Smoak & Stewart, P.C.

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From: O'Connor, Bridget K. [<mailto:boconnor@kirkland.com>]

Sent: Wednesday, February 26, 2014 1:06 PM

To: Strach, Phillip J.

Cc: Ryan, Elizabeth (CRT); Pocklington, Amy M.; Farr, Thomas A.; Peters, Alec; butch@butchbowers.com; Allison Riggs; Anita Earls; *AStein@tinfulton.com; bob.stephens@nc.gov; cbrook@acluofnc.org; dale.ho@aclu.org; Cooper, David (CRT); Donovan, Daniel T.; *dlieberman@advancementproject.org; Beck, Gill (USANCW); *jjoyner@NCCU.EDU; jebenstein@aclu.org; Rancour, Kimberly D.; lmcdonald@aclu.org; *phair@advancementproject.org; Fisher, Spencer (CRT); Yannucci, Thomas D.; Allen, Winn; Russ, John (CRT); JDevaney@perkinscoie.com; melias@perkinscoie.com; efrost@perkinscoie.com; Meza, Catherine (CRT)

Subject: RE: Meet and Confer

Phil: I am attaching what is hopefully the last turn on the document, reflecting Plaintiffs' input on Defendants' revisions from last night. As you will see, we have re-inserted Plaintiffs' suggested deadlines on the privilege logs and have those dates as a point upon which the parties will not agree. Plaintiffs' position on these deadlines is driven by the need to resolve any disputes over such logged items prior to the upcoming expert report deadlines in April/ preliminary injunction briefing deadlines immediately following in May. We also made some additional proposed revisions to the section discussing the turnaround time for Defendants' review of the documents Plaintiffs identify from the SBOE Initial Review Set.

Please let us know if you are agreeable to filing this version with these revisions. Per the discussion in Court on Friday, and in light of the (fortunately relatively limited) points upon which it appears we will not have agreement, it seems we should provide the Court with a Word version of this filing so that she can modify it in accordance with her ruling.

Thanks

Bridget K. O'Connor

KIRKLAND & ELLIS LLP

655 Fifteenth Street, NW, Suite 1200

Washington, D.C. 20005

Ph: (202) 879-5048 F: (202) 879-5200

From: Strach, Phillip J. [<mailto:Phil.Strach@ogletreedeakins.com>]

Sent: Wednesday, February 26, 2014 11:12 AM

To: O'Connor, Bridget K.

Cc: Ryan, Elizabeth (CRT); Pocklington, Amy M.; Farr, Thomas A.; Peters, Alec; butch@butchbowers.com; Allison Riggs; Anita Earls; *AStein@tinfulton.com; bob.stephens@nc.gov; cbrook@acluofnc.org; dale.ho@aclu.org; Cooper, David (CRT); Donovan, Daniel T.; *dlieberman@advancementproject.org; Beck, Gill (USANCW); *jjoyner@NCCU.EDU; jebenstein@aclu.org; Rancour, Kimberly D.; lmcdonald@aclu.org; *phair@advancementproject.org; Fisher, Spencer

(CRT); Yannucci, Thomas D.; Allen, Winn; Russ, John (CRT); JDevaney@perkinscoie.com; melias@perkinscoie.com; efrost@perkinscoie.com; Meza, Catherine (CRT)

Subject: RE: Meet and Confer

Bridget:

Attached are our edits to the Plaintiffs' revisions to Defendants' proposed joint submission. If Plaintiffs intend to propose additional revisions, we would appreciate receiving those revisions promptly (at least by 2:00 or 3:00) so that we have adequate time to review and respond prior to the 6:00 deadline.

Also, please let us know if you have considered or decided on a method for transferring the data. If Plaintiffs want to transfer it via the Relativity platform that was discussed yesterday, then we should be able to make the transfer by 28 February as specified in the submission. If not, then it may take a day or two longer to make the transfer. Please let us know your preference.

Regards,

Phillip J. Strach | Ogletree, Deakins, Nash, Smoak & Stewart, P.C.

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From: O'Connor, Bridget K. [<mailto:boconnor@kirkland.com>]

Sent: Tuesday, February 25, 2014 5:00 PM

To: Strach, Phillip J.

Cc: Ryan, Elizabeth (CRT); Pocklington, Amy M.; Farr, Thomas A.; Peters, Alec; butch@butchbowers.com; Allison Riggs; Anita Earls; *AStein@tinfulton.com; bob.stephens@nc.gov; cbrook@acluofnc.org; dale.ho@aclu.org; Cooper, David (CRT); Donovan, Daniel T.; *dlieberman@advancementproject.org; Beck, Gill (USANCW); *jjoyner@NCCU.EDU; jebenstein@aclu.org; Rancour, Kimberly D.; lmcdonald@aclu.org; *phair@advancementproject.org; Fisher, Spencer (CRT); Yannucci, Thomas D.; Allen, Winn; Russ, John (CRT); JDevaney@perkinscoie.com; melias@perkinscoie.com; efrost@perkinscoie.com; Meza, Catherine (CRT)

Subject: RE: Meet and Confer

Phil -- I am attaching a turn on the language that you sent us last night, reflecting the input of each of the Plaintiffs' counsel. This version keeps in the same mechanics for the structure for the SBOE review that you sent last night (and consistent with our call with the lit support professionals this morning), but adds in some of the other categories of materials that we discussed on yesterday's call and/or other points that were discussed at the hearing, and also fills in dates as to each of these categories. If this version is acceptable to your team, then we can put this in pleading form and get it submitted. Please let us know if you have any further revisions or comments on the attached.

Thanks

Bridget K. O'Connor

KIRKLAND & ELLIS LLP

655 Fifteenth Street, NW, Suite 1200

Washington, D.C. 20005

Ph: (202) 879-5048 F: (202) 879-5200

From: Strach, Phillip J. [<mailto:Phil.Strach@ogletreedeakins.com>]

Sent: Tuesday, February 25, 2014 4:54 PM

To: O'Connor, Bridget K.

Cc: Ryan, Elizabeth (CRT); Pocklington, Amy M.; Farr, Thomas A.; Peters, Alec; butch@butchbowers.com; Allison Riggs; Anita Earls; *AStein@tinfulton.com; bob.stephens@nc.gov; cbrook@acluofnc.org; dale.ho@aclu.org; Cooper, David (CRT); Donovan, Daniel T.; *dlieberman@advancementproject.org; Beck, Gill (USANCW); *jjoyner@NCCU.EDU;

jebenstein@aclu.org; Rancour, Kimberly D.; lmcdonald@aclu.org; *phair@advancementproject.org; Fisher, Spencer (CRT); Yannucci, Thomas D.; Allen, Winn; Russ, John (CRT); JDevaney@perkinscoie.com; melias@perkinscoie.com; efrost@perkinscoie.com; Meza, Catherine (CRT)

Subject: RE: Meet and Confer

Bridget – I was wondering if you would be able to give us an update on where this stands. If it appears we are close to an agreement on the mechanics of this, perhaps one of us could send an email to the Judge notifying her that we are close but need to finalize and file the joint report tomorrow? Thanks. Phil

Phillip J. Strach | Ogletree, Deakins, Nash, Smoak & Stewart, P.C.

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From: Strach, Phillip J.

Sent: Monday, February 24, 2014 9:00 PM

To: 'O'Connor, Bridget K.'

Cc: Ryan, Elizabeth (CRT); Pocklington, Amy M.; Farr, Thomas A.; Peters, Alec; butch@butchbowers.com; Allison Riggs; Anita Earls; *AStein@tinfulton.com; bob.stephens@nc.gov; cbrook@acluofnc.org; dale.ho@aclu.org; Cooper, David (CRT); Donovan, Daniel T.; *dlieberman@advancementproject.org; Beck, Gill (USANCW); *jjoyner@NCCU.EDU; jebenstein@aclu.org; Rancour, Kimberly D.; lmcdonald@aclu.org; *phair@advancementproject.org; Fisher, Spencer (CRT); Yannucci, Thomas D.; Allen, Winn; Russ, John (CRT); JDevaney@perkinscoie.com; melias@perkinscoie.com; efrost@perkinscoie.com; Meza, Catherine (CRT)

Subject: RE: Meet and Confer

All:

Below is the language Defendants are proposing in connection with the status report the parties are required to submit to Judge Peake tomorrow on the electronic records review and production. We consider this still a work-in-progress and reserve the right to tweak it tomorrow (and add some information in the blanks below) but wanted to go ahead and get it to you this evening in the interest of moving the process along.

Defendants propose that:

1. Defendants will review all electronic records collected from the Office of the Governor and from the Department of Transportation, and will produce all responsive, non-privileged, electronic records by ___ March 2014. Defendants will also prepare by ___ March 2014 a privilege log, consistent with the requirements of ¶¶ 31–33A of the Revised Consent Order Regarding Discovery of Documents and Electronically Stored Information entered 17 January 2014, for all responsive electronic records for which a privilege is asserted and a privilege log is required.
2. Defendants will review all electronic records collected from the State Board of Elections that were sent by or to, whether as primary recipient or “cc” recipient, counsel assisting with the litigation and will produce all responsive, non-privileged, electronic records by _____ 2014. Defendants will also prepare by _____ 2014 a privilege log, consistent with the requirements of ¶¶ 31–33A of the Revised Consent Order Regarding Discovery of Documents and Electronically Stored Information entered 17 January 2014, for all responsive electronic records for which a privilege is asserted and a privilege log is required.
3. Defendants will review all electronic records collected from the State Board of Elections that were sent by or to, whether as primary recipient or “cc” recipient, a member of the North Carolina General Assembly or any staff for a member of the North Carolina General Assembly, and will hold all responsive, non-privileged electronic records for production if such production is ultimately required by decisions of the district court or appellate courts on assertions of legislative immunity and privilege. Defendants will also prepare a privilege log, consistent with the requirements of ¶¶ 31–33A of the Revised Consent Order Regarding Discovery of Documents and Electronically Stored Information entered 17 January 2014, for all responsive

electronic records required to be produced and for which a privilege is asserted and a privilege log is required.

4. Defendants will, consistent with the provisions of ¶¶ 34–38 of the Revised Consent Order Regarding Discovery of Documents and Electronically Stored Information entered 17 January 2014, and without waiving any privilege or immunity, including but not limited to attorney-client privilege, work product protection, legislative privilege or legislative immunity, provide plaintiffs’ counsel with all electronic records collected from the State Board of Elections and not encompassed within ¶¶ 2 and 3 above for plaintiffs’ review. Such review shall be for attorneys’ eyes only, and reviewing attorneys may not share either the electronic records reviewed or the contents of electronic records reviewed with any plaintiff or with anyone else other than counsel for plaintiffs. Upon completion of this review, plaintiffs’ counsel will provide defendants with all electronic records they believe to be responsive to their discovery requests and that they intend to use as evidence at trial, in any preliminary hearing, in a deposition, or in any other way. In the event plaintiffs believe any of the electronic records are protected by the attorney-client privilege, the work product doctrine or legislative privilege or immunity, plaintiffs should immediately return any such document and notify defendants. Upon providing the electronic records to defendants, defendants will have ___ days to review the electronic records for responsiveness and to assert privileges as to any such electronic records. Plaintiffs’ counsel will be and are prohibited from disclosing in any way to any person, including plaintiffs, the contents of any electronic record not identified to defendants and reviewed by defendants, in accordance with this paragraph, and released by defendants as not privileged. For any electronic record for which a privilege or protection is asserted, plaintiffs’ counsel will be and are prohibited from disclosing in any way to any person, including plaintiffs, the contents of any such electronic record unless and until the asserted privilege has been withdrawn or the court has overruled the assertion of the privilege. All electronic records deemed not responsive by plaintiffs should be immediately destroyed. Plaintiffs have ___ days to certify to defendants that all such documents were destroyed in accordance with the terms of this Agreement.

Phillip J. Strach | Ogletree, Deakins, Nash, Smoak & Stewart, P.C.

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From: O'Connor, Bridget K. [<mailto:boconnor@kirkland.com>]

Sent: Monday, February 24, 2014 5:28 PM

To: Strach, Phillip J.

Cc: Ryan, Elizabeth (CRT); Pocklington, Amy M.; Farr, Thomas A.; Peters, Alec; butch@butchbowers.com; Allison Riggs; Anita Earls; *AStein@tinfulton.com; bob.stephens@nc.gov; cbrook@acluofnc.org; dale.ho@aclu.org; Cooper, David (CRT); Donovan, Daniel T.; *dlieberman@advancementproject.org; Beck, Gill (USANCW); *jjoyner@NCCU.EDU; jebenstein@aclu.org; Rancour, Kimberly D.; lmcdonald@aclu.org; *phair@advancementproject.org; Fisher, Spencer (CRT); Yannucci, Thomas D.; Allen, Winn; Russ, John (CRT); JDevaney@perkinscoie.com; melias@perkinscoie.com; efrost@perkinscoie.com; Meza, Catherine (CRT)

Subject: RE: Meet and Confer

Phil: Plaintiffs are available for a call for the IT/lit support professionals from your team and ours to speak regarding the best way to facilitate the provision of documents to Plaintiffs for review subject to the clawback provision tomorrow at 11:30 AM. Please let us know if that time will work for you. If so, we can use the following dial-in number:

866-331-1856 code 2028795048

Thanks

Bridget K. O'Connor
KIRKLAND & ELLIS LLP

655 Fifteenth Street, NW, Suite 1200
Washington, D.C. 20005
Ph: (202) 879-5048 F: (202) 879-5200

From: Strach, Phillip J. [<mailto:Phil.Strach@ogletreedeakins.com>]

Sent: Monday, February 24, 2014 9:13 AM

To: O'Connor, Bridget K.

Cc: Ryan, Elizabeth (CRT); Pocklington, Amy M.; Farr, Thomas A.; Peters, Alec; butch@butchbowers.com; Allison Riggs; Anita Earls; *AStein@tinfulton.com; bob.stephens@nc.gov; cbrook@acluofnc.org; dale.ho@aclu.org; Cooper, David (CRT); Donovan, Daniel T.; *dlieberman@advancementproject.org; Beck, Gill (USANCW); *jjoyner@NCCU.EDU; jebenstein@aclu.org; Rancour, Kimberly D.; lmcdonald@aclu.org; *phair@advancementproject.org; Fisher, Spencer (CRT); Yannucci, Thomas D.; Allen, Winn; Russ, John (CRT); JDevaney@perkinscoie.com; melias@perkinscoie.com; efrost@perkinscoie.com; Meza, Catherine (CRT)

Subject: RE: Meet and Confer

Thanks Bridget. 4:30 will work for us. Talk to you then. Phil

Phillip J. Strach | Ogletree, Deakins, Nash, Smoak & Stewart, P.C.

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phil.strach@ogletreedeakins.com | www.ogletreedeakins.com

From: O'Connor, Bridget K. [<mailto:boconnor@kirkland.com>]

Sent: Monday, February 24, 2014 8:54 AM

To: Strach, Phillip J.

Cc: Ryan, Elizabeth (CRT); Pocklington, Amy M.; Farr, Thomas A.; Peters, Alec; butch@butchbowers.com; Allison Riggs; Anita Earls; *AStein@tinfulton.com; bob.stephens@nc.gov; cbrook@acluofnc.org; dale.ho@aclu.org; Cooper, David (CRT); Donovan, Daniel T.; *dlieberman@advancementproject.org; Beck, Gill (USANCW); *jjoyner@NCCU.EDU; jebenstein@aclu.org; Rancour, Kimberly D.; lmcdonald@aclu.org; *phair@advancementproject.org; Fisher, Spencer (CRT); Yannucci, Thomas D.; Allen, Winn; Russ, John (CRT); JDevaney@perkinscoie.com; melias@perkinscoie.com; efrost@perkinscoie.com; Meza, Catherine (CRT)

Subject: Re: Meet and Confer

Phil,
Plaintiffs' counsel cannot do 10:30 AM today, but we can do 4:30 PM today if that would work for Defendants' counsel. If so, we can use the following dial-in: 866-331-1856 code 2028795048.

Thanks

On Feb 23, 2014, at 9:22 PM, "Strach, Phillip J." <Phil.Strach@ogletreedeakins.com> wrote:

Counsel:

We suggest a telephone conference tomorrow morning (Monday, Feb. 24) at 10:30 am to discuss the joint status report the Court has asked the parties to submit on Tuesday, February 25. Please let us know if you are available.

Regards,

Phillip J. Strach | Ogletree, Deakins, Nash, Smoak & Stewart, P.C.

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