

CAUSE NO. 2022-79328

ERIN ELIZABETH
LUNCEFORD

Contestant,

v.

TAMIKA "TAMI" CRAFT

Contestee.

§
§ IN THE DISTRICT COURT
§
§
§
§ 164th JUDICIAL DISTRICT
§
§
§
§ HARRIS COUNTY, TEXAS
§
§

**CONTESTANT ERIN LUNCEFORD'S FIRST REQUEST FOR
PRODUCTION OF DOCUMENTS TO NON-PARTY HARRIS COUNTY
AND CLIFFORD TATUM, IN HIS CAPACITY AS THE ELECTION
ADMINISTRATOR FOR HARRIS COUNTY**

TO: Non-Party Harris County and Clifford Tatum, in his capacity as the Election Administrator for Harris County, by and through their attorney of record, Jonathan Fombonne, Harris County First Assistant Attorney, Legal Department, 1019 Congress, 15th Floor, Houston, Texas 77002, jonathan.fombonne@harriscountytexas.gov.

Contestant Erin Lunceford hereby serves this First Request for Production of Documents on the above-referenced non-parties. Because of the accelerated nature of this election contest, and pursuant to the agreement made with opposing counsel during a telephone status conference with Judge Peeples and all counsel for the Contestant and Contestee, Contestant hereby requests that each of these Requests for Production be responded to immediately, but in no event any later than 30 days after service as required by the Texas Rules of Civil Procedure.

Respectfully Submitted,

ANDY TAYLOR & ASSOCIATES, P.C.

BY: /s/ Andy Taylor

Andy Taylor

State Bar No. 19727600

2628 Highway 36S, #288

Brenham, Texas 77833

713-222-1817 (telephone)

713-222-1855 (facsimile)

SONYA L ASTON LAW PLLC

BY: /s/ Sonya L. Aston

Sonya L. Aston

State Bar No. 00787007

1151 Curtin Street

Houston, TX 77018

713-320-5808 (telephone)

sonya@sonyaaston.com

ATTORNEYS FOR CONTESTANT

CERTIFICATE OF SERVICE

I hereby certify that I have served a copy of the foregoing on all counsel of record on December 14, 2022 in accordance with the Texas Rules of Civil Procedure via email.

Steve Kherkher
Kherkher Garcia, LLP
2925 Richmond Ave., Suite 1560
Houston, TX 77098
713.253.7272 - Cell
713.333.1030 - Main
713.333.1029 - Fax
skherkher@kherkhergarcia.com
Attorneys for Contestee

/s/ Andy Taylor
ANDY TAYLOR

EXHIBIT A

DOCUMENTS REQUESTED¹

1. All election supplies, as that term is defined in Section 51.001 of the Texas Election Code (e.g., “the equipment, ballots, forms, lists of registered voters, and other materials necessary to conduct an election”).

Response:

2. All precinct election records, as that term is defined in Section 66.002 of the Texas Election Code (e.g., “precinct election returns, voted ballots, and other records of an election that are assembled and distributed”).

Response:

3. The election day vote totals cast by precinct, as that term is defined in Section 66.0021 of the Texas Election Code (e.g., “list that states the total number of votes cast in each precinct by personal appearance on election day”).

Response:

4. The envelopes as defined in Section 66.003 (e.g., “Envelope No. 1, No. 2, No. 3 and No. 4”), as well as the contents of those envelopes as defined in Section 66.022, 66.023, 66.024, and 66.0241 of the Texas Election Code (e.g., “Contents of Envelope No. 1, No. 2, No. 3 and No. 4”).

Response:

5. The contents of ballot box number 3 and 4, as that term is defined in Section 66.025 and 66.026, respectively (e.g., “Contents of Ballot Box No. 3 and Contents of Ballot Box No. 4”).

Response:

6. Electronic records created under Chapter 129 of the Texas Election Code, and as further described by Section 66.058 of the Texas Election Code.

¹ Each of these Requests pertain to the November 8, 2022 General Election cycle.

Response:

7. Rotating ballot boxes number 1 and 2, as defined in Section 65.003 of the Texas Election Code (e.g., “Rotating Ballot Boxes No. 1 and No. 2”).

Response:

8. All provisional ballot affidavits.

Response:

9. All provisional ballots remaining inside of provisional ballot affidavits.

Response:

10. All mail-in ballot applications.

Response:

11. All mail-in ballot envelopes.

Response:

12. All mail-in ballots remaining inside of mail-in ballot envelopes.

Response:

13. All statements of residency.

Response:

14. All limited ballot applications.

Response:

15. All limited ballots.

Response:

16. All ADA reports for all polling locations during early voting and also during election day voting.

Response:

17. All turnout reports.

Response:

18. All tally reports.

Response:

19. All chain of custody documents or reports.

Response:

20. All documents regarding the supply of ballot paper or other supplies or equipment.

Response:

21. All call logs maintained by the Harris County Elections Administrator during election day.

Response:

22. Any and all other documents, equipment, supplies, or records arising out of the November 8, 2022 General Election in Harris County.

Response: