

Exhibit A

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Chris Dodge

From: O'Hickey, Bridget K (CIV) <Bridget.K.O'Hickey@usdoj.gov>
Sent: Monday, May 5, 2025 3:09 PM
To: Lali Madduri; Anna Baldwin; Gates, Michael (CRT); Kambli, Abhishek (OASG); Farby, Lesley (CIV)
Cc: dlang@campaignlegalcenter.org; Sophia Lakin; Leah Aden; Eliza Sweren-Becker; Pooja Chaudhuri; Aria Branch; Chris Dodge; Jacob Shelly
Subject: RE: Voting EO litigation (D.D.C.) - proposed schedule

You don't often get email from bridget.k.o'hickey@usdoj.gov. [Learn why this is important](#)

Thank you for sending over the draft. I will add our proposal and send this back. I should note that because we maintain that no discovery is necessary and are submitting our separate proposal, we will also propose some earlier dates for the Court's consideration.

From: Lali Madduri <lmadduri@elias.law>
Sent: Monday, May 5, 2025 3:00 PM
To: O'Hickey, Bridget K (CIV) <Bridget.K.O'Hickey@usdoj.gov>; Anna Baldwin <abaldwin@campaignlegalcenter.org>; Gates, Michael (CRT) <Michael.Gates2@usdoj.gov>; Kambli, Abhishek (OASG) <Abhishek.Kambli@usdoj.gov>; Farby, Lesley (CIV) <Lesley.Farby@usdoj.gov>
Cc: dlang@campaignlegalcenter.org; Sophia Lakin <slakin@aclu.org>; Leah Aden <laden@naacpldf.org>; Eliza Sweren-Becker <sweren-beckere@brennan.law.nyu.edu>; Pooja Chaudhuri <pooja@statedemocracydefenders.org>; Aria Branch <abranh@elias.law>; Chris Dodge <cdodge@elias.law>; Jacob Shelly <jshelly@elias.law>
Subject: [EXTERNAL] RE: Voting EO litigation (D.D.C.) - proposed schedule

Counsel:

See attached for draft submission. We'll look out for the updated draft.

Regards,
 Lali

Lali Madduri
 Partner
 Elias Law Group LLP
 202-968-4593

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From: O'Hickey, Bridget K (CIV) <Bridget.K.O'Hickey@usdoj.gov>
Sent: Monday, May 5, 2025 12:24 PM
To: Lali Madduri <lmadduri@elias.law>; Anna Baldwin <abaldwin@campaignlegalcenter.org>; Gates, Michael (CRT) <Michael.Gates2@usdoj.gov>; Kambli, Abhishek (OASG) <Abhishek.Kambli@usdoj.gov>; Farby, Lesley (CIV) <Lesley.Farby@usdoj.gov>
Cc: dlang@campaignlegalcenter.org; Sophia Lakin <slakin@aclu.org>; Leah Aden <laden@naacpldf.org>; Eliza Sweren-Becker <sweren-beckere@brennan.law.nyu.edu>; Pooja Chaudhuri <pooja@statedemocracydefenders.org>; Aria

Branch <abbranch@elias.law>

Subject: RE: Voting EO litigation (D.D.C.) - proposed schedule

Dear Counsel,

Defendants will not reconsider their position on discovery and will propose a separate schedule. Could you send me the draft with your proposal so that I can insert our proposal and language? After that I will recirculate to you.

Thank you,

Bridget

From: Lali Madduri <lmadduri@elias.law>

Sent: Monday, May 5, 2025 11:04 AM

To: O'Hickey, Bridget K (CIV) <Bridget.K.O'Hickey@usdoj.gov>; Anna Baldwin <abaldwin@campaignlegalcenter.org>; Gates, Michael (CRT) <Michael.Gates2@usdoj.gov>; Kambli, Abhishek (OASG) <Abhishek.Kambli@usdoj.gov>; Farby, Lesley (CIV) <Lesley.Farby@usdoj.gov>

Cc: dlang@campaignlegalcenter.org; Sophia Lakin <slakin@aclu.org>; Leah Aden <laden@naacpldf.org>; Eliza Sweren-Becker <sweren-beckere@brennan.law.nyu.edu>; Pooja Chaudhuri <pooja@statedemocracydefenders.org>; Aria Branch <abbranch@elias.law>

Subject: [EXTERNAL] RE: Voting EO litigation (D.D.C.) - proposed schedule

Counsel:

Thank you for your response. The Democratic Party Plaintiffs maintain that discovery is appropriate for some of their claims. For example, as Judge Kollar-Kotelly recognized, further factual development may be necessary as to "Defendants plans to implement Section 2(b)" of the executive order. PI Order at 85. And the government itself argued that the "factual record is underdeveloped" as to our claims against Sections 2(b), 2(d), 7(a), and 7(b). PI Opp. at 42. Discovery is appropriate for such factual development. As previously stated, Democratic Party Plaintiffs hope to work with Defendants to conduct streamlined and efficient discovery. Given this, are Defendants willing to reconsider their position regarding discovery?

If not, we will need to offer the two proposed schedules to the Court. Under that scenario, Democratic Party Plaintiffs intend to propose the schedule Ms. Baldwin sent over the weekend, with 30 days for the government's response, as requested. Democratic Party Plaintiffs would propose that schedule contingent on a discovery period.

Please let us know your position as soon as possible. If we will propose two separate schedules to the Court, please let us know if there is any additional language Defendants wish to include with their proposed schedule.

As noted in Ms. Baldwin's Saturday email, we will also include the bullet points the parties have agreed on in the filing:

- This proposed schedule is contingent on defendants' representation that they do not intend to appeal the preliminary injunction. Plaintiffs likewise do not intend to appeal any determinations made at the preliminary injunction stage. The schedule is also contingent on defendants' representations that they do not intend to file motions to dismiss. Plaintiffs reserve the right to

seek to modify the schedule if defendants do appeal the preliminary injunction, or take other actions that may cause a need for adjustment.

- Democratic Party Plaintiffs and Non-Partisan Plaintiffs reserve the right to seek further preliminary injunctive relief if necessary based upon changed factual circumstances prior to resolution of summary judgment motions. For instance, Democratic Party and LULAC Plaintiffs reserve the right to seek preliminary injunctive relief if Defendants make changes to the UOCAVA post card application form in order to require DPOC, as under Section 3(d) of the EO, prior to the permissibility of such changes being resolved on summary judgment.

Regards,
Lali

Lali Madduri
Partner
Elias Law Group LLP
202-968-4593

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From: O'Hickey, Bridget K (CIV) <Bridget.K.O'Hickey@usdoj.gov>
Sent: Sunday, May 4, 2025 3:20 PM
To: Anna Baldwin <abaldwin@campaignlegalcenter.org>; Gates, Michael (CRT) <Michael.Gates2@usdoj.gov>; Kambli, Abhishek (OASG) <Abhishek.Kambli@usdoj.gov>; Farby, Lesley (CIV) <Lesley.Farby@usdoj.gov>
Cc: dlang@campaignlegalcenter.org; Sophia Lakin <slakin@aclu.org>; Leah Aden <laden@naacpldf.org>; Eliza Sweren-Becker <sweren-beckere@brennan.law.nyu.edu>; Pooja Chaudhuri <pooja@statedemocracydefenders.org>; Lali Madduri <lmadduri@elias.law>; Aria Branch <abbranch@elias.law>
Subject: RE: Voting EO litigation (D.D.C.) - proposed schedule

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Dear Counsel,

Thank you for sending over this proposal. However, because the claims in this case concern purely legal issues, we will not be able to agree to a scheduling proposal that provides for discovery. If you would like to proceed with the schedule you proposed without discovery, then we request 30 days to file our combined response and cross-summary-judgment motion after you file your motions. I adjusted the remaining dates according to the amount of time you had allotted. We propose the following:

- September 17: Plaintiffs file summary-judgment motions.
- October 17: Defendants file response/cross-summary-judgment motion.
- November 7: Plaintiffs file responses/replies.
- November 21: Defendants file reply.

Additionally, we would ask that our deadline to file an answer be deferred until the summary-judgment motions have been resolved. Please let us know your position.

Thank you,

Bridget O'Hickey

From: Anna Baldwin <abaldwin@campaignlegalcenter.org>

Sent: Saturday, May 3, 2025 3:50 PM

To: Gates, Michael (CRT) <Michael.Gates2@usdoj.gov>; O'Hickey, Bridget K (CIV) <Bridget.K.O'Hickey@usdoj.gov>; Kambli, Abhishek (OASG) <Abhishek.Kambli@usdoj.gov>

Cc: Danielle Lang <dlang@campaignlegalcenter.org>; Sophia Lakin <slakin@aclu.org>; Leah Aden <laden@naacpldf.org>; Eliza Sweren-Becker <sweren-beckere@brennan.law.nyu.edu>; Pooja Chaudhuri <pooja@statedemocracydefenders.org>; Lali Madduri <lmadduri@elias.law>; Aria Branch <abbranch@elias.law>

Subject: [EXTERNAL] Voting EO litigation (D.D.C.) - proposed schedule

Dear counsel,

Thank you for the productive meet and confer call on Friday. Below is the schedule that all three plaintiffs' groups propose. While we had discussed two rounds of summary briefing during our call, given defendants' representation that you all are not appealing the preliminary injunction, we propose one round of dispositive briefing, as set out below. Where non-partisan plaintiffs share a claim, we would brief that issue jointly, as under the court's previous briefing order. There would not be joint briefing as between the non-partisan and Democratic plaintiffs.

In the filing before the court, we would set out the proposed schedule, as well as the following additional statements bulleted below. Please let us know if you all are amenable to proceeding on this schedule. Once we have the parties' positions, I am glad to circulate a draft document for all to approve/edit for filing.

Best,

Anna

Proposed Schedule

- Initial disclosures: May 12
- Sept. 2: Close of discovery (or 30 days after resolution of any discovery motion filed by Sept. 1)
- Sept 17: Plaintiffs file summary judgments
- Oct 8: Defendants file cross-summary judgment/response
- Oct. 29: Plaintiffs file responses/replies
- Nov. 12: Defendants file reply

Other Issues

- This proposed schedule is contingent on defendants' representation that they do not intend to appeal the preliminary injunction. Plaintiffs likewise do not intend to appeal any determinations made at the preliminary injunction stage. The schedule is also contingent on defendants' representations that they do not intend to file motions to dismiss. Plaintiffs reserve the right to seek to modify the schedule if defendants do appeal the preliminary injunction, or take other actions that may cause a need for adjustment.

- Democratic Party Plaintiffs and Non-Partisan Plaintiffs reserve the right to seek further preliminary injunctive relief if necessary based upon changed factual circumstances prior to resolution of summary judgment motions. For instance, Democratic Party and LULAC Plaintiffs reserve the right to seek preliminary injunctive relief if Defendants make changes to the UOCAVA post card application form in order to require DPOC, as under Section 3(d) of the EO, prior to the permissibility of such changes being resolved on summary judgment.
- Democratic Party Plaintiffs anticipate limited discovery regarding some of their claims and intend to work with Defendants to conduct discovery efficiently. For instance, the Democratic Party Plaintiffs anticipate some discovery relating to their Privacy Act claims. The Non-Partisan Plaintiffs do not intend to take party discovery at this time given the current representations by the defendants, but reserve the right to take party discovery if circumstances change.

Anna Baldwin (they/them)

Senior Legal Counsel, Voting Rights
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