

# **Exhibit A**

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**From:** Vishal Agraharkar <vagraharkar@acluva.org>  
**Sent:** Wednesday, April 22, 2026 1:08 PM  
**To:** Breckenridge, Tillman J.; Davenport, Jae K.  
**Cc:** eheilman@acluva.org; Amadi, Brittany; Werle, Nick; jared.davidson@protectdemocracy.org  
**Subject:** Re: King v. Youngkin

**EXTERNAL SENDER**

Tillman and JK:

Thanks for your time yesterday. We wanted to follow up on the state's request to delay the deadline for implementation until June 1 and summarize next steps coming out of the call.

Regarding your request to delay implementation, we are amenable to a delayed implementation date to accommodate the state's technical challenges in rebuilding the prohibited table and identifying the list of ineligible voters. However, we believe it's important to notify the court, and the public, of any changes to the timeline for implementation of its order, and also because we are concerned that class members and voting advocacy groups may attempt on that date to register, which if they are unsuccessful could lead them to wrongly believe they are ineligible, or conversely put them at risk of prosecution. Therefore, we think that the best course would be to enter a joint stipulation memorializing the state's progress towards implementation and proposing a new deadline for implementation. We can take a first pass at a joint stipulation if that sounds good to you all.

As to the list of felonies, we understand that the state is willing to share the list with us prior to publication but is not quite ready to do so right now. Can the state commit to sharing the list of felonies with us in advance of May 1, even as technical challenges prevent implementation of the complete order until June 1?

We also raised the following issues and questions which you indicated you would discuss with the relevant agencies in advance of our next call:

- Can you share with us the specific plans around how the prohibited table will be created and allow us an opportunity to provide feedback?
- What updates will be made to the paper and online registration forms and will we be allowed an opportunity to provide feedback?
- What updates are planned for election official trainings and handbooks or other guidance about the decision so that newly-eligible voters are able to register up to the day of the election without issue, and can those be shared with us?
- What is the state's plan with respect to guidance for people with federal or out-of-state offenses? For example, will people with out-of-state convictions whose voting rights were restored in that state upon release from incarceration or otherwise, continue to be eligible to vote upon moving to Virginia? And assuming so, will there be guidance to election officials and voters with such convictions?
- What is the state's plan on voter and public education about the new eligibility rules?

- Will people be designated at ELECT and/or SoC to be available to offer guidance to voters and election officials about eligibility?

As we mentioned, we think our next call would be most productive if the officials in charge of implementation were able to attend to discuss their plans. Now that the litigation has come to an end, we hope to have a productive relationship to work together to ensure that all eligible voters are able to vote and not deterred from doing so because of confusion around eligibility rules.

Please let us know if any of the below times work for a call during the week of May 4 (with a preference for Tuesday or Wednesday):

Monday, May 4: 10 am - 1 pm, 4-5 pm

Tuesday, May 5: 3-5 pm

Wednesday, May 6: 1:30-5

Friday, May 8: 10-11, 1-5

Thanks,

Vishal

Vishal Agraharkar (he/him)  
Senior Supervising Attorney  
ACLU of Virginia  
P.O. Box 26464  
Richmond, VA 23261  
■ t 804.523.2151  
■ c 804.986.9312  
■ f 804.649.2733  
■ [vagraharkar@acluva.org](mailto:vagraharkar@acluva.org)



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**From:** Eden Heilman <eheilman@acluva.org>

**Date:** Friday, April 17, 2026 at 9:44 AM

**To:** Breckenridge, Tillman J. <TBreckenridge@oag.state.va.us>, Vishal Agraharkar <vagraharkar@acluva.org>

**Cc:** Davenport, Jae K. <JKDavenport@oag.state.va.us>, Amadi, Brittany <brittany.amadi@wilmerhale.com>, Werle, Nick <nick.werle@wilmerhale.com>, Jared Davidson <jared.davidson@protectdemocracy.org>

**Subject:** RE: King v. Youngkin

That sounds great. Here is a zoom link we can use: <https://us02web.zoom.us/j/85307374734?pwd=WUmMbKXetCzP22vnLlqnxaa2OH1HU4.1>

Speak to you on Tuesday.

My best,  
Eden

**Eden B. Heilman**  
Legal Director  
*Pronouns: She/Her/Hers*  
ACLU of Virginia  
P.O. Box 26464  
Richmond, VA 23261  
■ o 804.523.2152 ■ [eheilman@acluva.org](mailto:eheilman@acluva.org)



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**From:** Breckenridge, Tillman J. <[TBreckenridge@oag.state.va.us](mailto:TBreckenridge@oag.state.va.us)>  
**Sent:** Thursday, April 16, 2026 3:05 PM  
**To:** Eden Heilman <[eheilman@acluva.org](mailto:eheilman@acluva.org)>; Vishal Agraharkar <[vagraharkar@acluva.org](mailto:vagraharkar@acluva.org)>  
**Cc:** Davenport, Jae K. <[JKDavenport@oag.state.va.us](mailto:JKDavenport@oag.state.va.us)>; Amadi, Brittany <[brittany.amadi@wilmerhale.com](mailto:brittany.amadi@wilmerhale.com)>; Werle, Nick <[nick.werle@wilmerhale.com](mailto:nick.werle@wilmerhale.com)>; Jared Davidson <[jared.davidson@protectdemocracy.org](mailto:jared.davidson@protectdemocracy.org)>  
**Subject:** RE: King v. Youngkin

Thanks for reaching out, Eden. How about we aim for 1030-11 on Tuesday?

Kind regards,  
Tillman



**Tillman J Breckenridge | Solicitor General**  
**Office of the Attorney General**  
202 North 9th Street  
Richmond, Virginia 23219  
O: 804-786-7704 | M: | F:  
[TBreckenridge@oag.state.va.us](mailto:TBreckenridge@oag.state.va.us)  
<https://www.oag.state.va.us>

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**From:** Eden Heilman <[eheilman@acluva.org](mailto:eheilman@acluva.org)>  
**Sent:** Wednesday, April 15, 2026 5:18 PM  
**To:** Breckenridge, Tillman J. <[TBreckenridge@oag.state.va.us](mailto:TBreckenridge@oag.state.va.us)>; Vishal Agraharkar <[vagraharkar@acluva.org](mailto:vagraharkar@acluva.org)>  
**Cc:** Hill, Travis G. <[THill@oag.state.va.us](mailto:THill@oag.state.va.us)>; Zamostny, Nicky <[NZamostny@oag.state.va.us](mailto:NZamostny@oag.state.va.us)>; Davenport, Jae K. <[JKDavenport@oag.state.va.us](mailto:JKDavenport@oag.state.va.us)>; Amadi, Brittany <[brittany.amadi@wilmerhale.com](mailto:brittany.amadi@wilmerhale.com)>; Werle, Nick <[nick.werle@wilmerhale.com](mailto:nick.werle@wilmerhale.com)>; Jared Davidson <[jared.davidson@protectdemocracy.org](mailto:jared.davidson@protectdemocracy.org)>  
**Subject:** RE: King v. Youngkin

Hi Tillman,

Hope you are doing well. We are reaching out to see if you would be available for a call with us early next week to discuss implementation of the Court's January 22 order in *King v. Youngkin*. We are generally flexible any time Monday before 5pm and Tuesday except between 12-3pm or after 4:30pm. Please let us know if you have availability either day.

My best,  
Eden Heilman

**Eden B. Heilman**  
Legal Director  
*Pronouns: She/Her/Hers*  
ACLU of Virginia  
P.O. Box 26464  
Richmond, VA 23261  
■ o 804.523.2152 ■ [eheilman@acluva.org](mailto:eheilman@acluva.org)



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**From:** Eden Heilman  
**Sent:** Friday, January 30, 2026 3:02 PM  
**To:** 'Breckenridge, Tillman J.' <[TBreckenridge@oag.state.va.us](mailto:TBreckenridge@oag.state.va.us)>; Vishal Agraharkar <[vagraharkar@acluva.org](mailto:vagraharkar@acluva.org)>  
**Cc:** Hill, Travis G. <[THill@oag.state.va.us](mailto:THill@oag.state.va.us)>; Zamostny, Nicky <[NZamostny@oag.state.va.us](mailto:NZamostny@oag.state.va.us)>; Davenport, Jae K. <[JKDavenport@oag.state.va.us](mailto:JKDavenport@oag.state.va.us)>; Amadi, Brittany <[brittany.amadi@wilmerhale.com](mailto:brittany.amadi@wilmerhale.com)>; Werle, Nick <[nick.werle@wilmerhale.com](mailto:nick.werle@wilmerhale.com)>; Jared Davidson <[jared.davidson@protectdemocracy.org](mailto:jared.davidson@protectdemocracy.org)>  
**Subject:** RE: King v. Youngkin

Hi Tillman –

Thank you for the productive call yesterday. We look forward to working with your office to implement Judge Gibney's order. As previewed, we have been unable to connect with our clients or fully consider your proposal. We aim to have a response next week, and think it would be productive to take it up on another call at that time.

Have a good weekend.

**Eden B. Heilman**  
Legal Director  
*Pronouns: She/Her/Hers*  
ACLU of Virginia  
P.O. Box 26464  
Richmond, VA 23261  
■ o 804.523.2152 ■ [eheilman@acluva.org](mailto:eheilman@acluva.org)



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**From:** Breckenridge, Tillman J. <[TBreckenridge@oag.state.va.us](mailto:TBreckenridge@oag.state.va.us)>  
**Sent:** Wednesday, January 28, 2026 2:28 PM  
**To:** Eden Heilman <[ehailman@acluva.org](mailto:ehailman@acluva.org)>; Vishal Agraharkar <[vagraharkar@acluva.org](mailto:vagraharkar@acluva.org)>  
**Cc:** Hill, Travis G. <[THill@oag.state.va.us](mailto:THill@oag.state.va.us)>; Zamostny, Nicky <[NZamostny@oag.state.va.us](mailto:NZamostny@oag.state.va.us)>; Davenport, Jae K. <[JKDavenport@oag.state.va.us](mailto:JKDavenport@oag.state.va.us)>; Amadi, Brittany <[brittany.amadi@wilmerhale.com](mailto:brittany.amadi@wilmerhale.com)>; Werle, Nick <[nick.werle@wilmerhale.com](mailto:nick.werle@wilmerhale.com)>; Jared Davidson <[jared.davidson@protectdemocracy.org](mailto:jared.davidson@protectdemocracy.org)>  
**Subject:** RE: King v. Youngkin

11 am works for us, thanks.

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**From:** Eden Heilman <[ehailman@acluva.org](mailto:ehailman@acluva.org)>  
**Sent:** Wednesday, January 28, 2026 10:03 AM  
**To:** Breckenridge, Tillman J. <[TBreckenridge@oag.state.va.us](mailto:TBreckenridge@oag.state.va.us)>; Vishal Agraharkar <[vagraharkar@acluva.org](mailto:vagraharkar@acluva.org)>  
**Cc:** Hill, Travis G. <[THill@oag.state.va.us](mailto:THill@oag.state.va.us)>; Zamostny, Nicky <[NZamostny@oag.state.va.us](mailto:NZamostny@oag.state.va.us)>; Davenport, Jae K. <[JKDavenport@oag.state.va.us](mailto:JKDavenport@oag.state.va.us)>; Amadi, Brittany <[brittany.amadi@wilmerhale.com](mailto:brittany.amadi@wilmerhale.com)>; Werle, Nick <[nick.werle@wilmerhale.com](mailto:nick.werle@wilmerhale.com)>; Jared Davidson <[jared.davidson@protectdemocracy.org](mailto:jared.davidson@protectdemocracy.org)>  
**Subject:** RE: King v. Youngkin

Tillman,

Members of our co-counsel team are available at 11am tomorrow for a call. Does that work for you all?

**Eden B. Heilman**  
Legal Director  
*Pronouns: She/Her/Hers*  
ACLU of Virginia  
P.O. Box 26464  
Richmond, VA 23261  
■ o 804.523.2152 ■ [ehailman@acluva.org](mailto:ehailman@acluva.org)



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**From:** Breckenridge, Tillman J. <[TBreckenridge@oag.state.va.us](mailto:TBreckenridge@oag.state.va.us)>  
**Sent:** Tuesday, January 27, 2026 7:12 PM  
**To:** Eden Heilman <[ehailman@acluva.org](mailto:ehailman@acluva.org)>; Vishal Agraharkar <[vagraharkar@acluva.org](mailto:vagraharkar@acluva.org)>  
**Cc:** Hill, Travis G. <[THill@oag.state.va.us](mailto:THill@oag.state.va.us)>; Zamostny, Nicky <[NZamostny@oag.state.va.us](mailto:NZamostny@oag.state.va.us)>; Davenport, Jae K. <[JKDavenport@oag.state.va.us](mailto:JKDavenport@oag.state.va.us)>  
**Subject:** RE: King v. Youngkin

Sorry to move the ball on this, but tomorrow afternoon is looking booked up. Is Thursday available?

**From:** Breckenridge, Tillman J.

**Sent:** Tuesday, January 27, 2026 5:57 PM

**To:** Eden Heilman <[eheilman@acluva.org](mailto:eheilman@acluva.org)>; Vishal Agraharkar <[vagraharkar@acluva.org](mailto:vagraharkar@acluva.org)>

**Cc:** Hill, Travis G. <[THill@oag.state.va.us](mailto:THill@oag.state.va.us)>; Zamosny, Nicky <[NZamosny@oag.state.va.us](mailto:NZamosny@oag.state.va.us)>; Davenport, Jae K. <[JKDavenport@oag.state.va.us](mailto:JKDavenport@oag.state.va.us)>

**Subject:** King v. Youngkin

Thank you both for the call today regarding King v. Youngkin. We liked your idea of getting together with the larger counsel group to see about the best way to avoid any appeal, and we wanted to know if there's a good time tomorrow afternoon or Thursday morning for everyone to discuss?

Kind regards,  
Tillman