

Exhibit J

From: [Breckenridge, Tillman J.](#)
To: [Amadi, Brittany](#); [Saini, Ajay P.](#); [Davenport, Jae K.](#)
Cc: [eheilman@acluva.org](#); [Werle, Nick](#); [jared.davidson@protectdemocracy.org](#); [Liss, Jason H](#); [vagraharkar@acluva.org](#); [Harper, Adam Ellis](#)
Subject: RE: King v. O'Bannon, No. 3:23-cv-408-JAG (E.D. Va.)
Date: Monday, June 15, 2026 5:29:14 PM

EXTERNAL SENDER

Brittany,

Given our inability to agree on what is written a few e-mails below, I do not think it would be prudent to engage in verbal discussions. Any further communications among us will need to be in writing.

Regards,
Tillman



Tillman J Breckenridge | Solicitor General
Office of the Attorney General

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Richmond, Virginia 23219
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From: Amadi, Brittany <Brittany.Amadi@wilmerhale.com>
Sent: Saturday, June 13, 2026 10:59 AM
To: Breckenridge, Tillman J. <TBreckenridge@oag.state.va.us>; Saini, Ajay P. <ASaini@oag.state.va.us>; Davenport, Jae K. <JKDavenport@oag.state.va.us>
Cc: eheilman@acluva.org; Werle, Nick <Nick.Werle@wilmerhale.com>; jared.davidson@protectdemocracy.org; Liss, Jason H <Jason.Liss@wilmerhale.com>; vagraharkar@acluva.org; Harper, Adam Ellis <Adam.Harper@wilmerhale.com>
Subject: RE: King v. O'Bannon, No. 3:23-cv-408-JAG (E.D. Va.)

Tillman,

We disagree with everything in your email. We are available to meet and confer on Tuesday at 9am. Please confirm that time works for the Commonwealth or propose an alternative time.

Best,
Brittany

From: Breckenridge, Tillman J. <TBreckenridge@oag.state.va.us>
Sent: Friday, June 12, 2026 3:21 PM
To: Amadi, Brittany <Brittany.Amadi@wilmerhale.com>; Saini, Ajay P. <ASaini@oag.state.va.us>;
Davenport, Jae K. <JKDavenport@oag.state.va.us>
Cc: eheilman@acluva.org; Werle, Nick <Nick.Werle@wilmerhale.com>;
jared.davidson@protectdemocracy.org; Liss, Jason H <Jason.Liss@wilmerhale.com>;
vagraharkar@acluva.org; Harper, Adam Ellis <Adam.Harper@wilmerhale.com>
Subject: RE: King v. O’Bannon, No. 3:23-cv-408-JAG (E.D. Va.)

EXTERNAL SENDER

Brittany,

Nowhere in the e-mail below do I state or otherwise suggest that the Commonwealth’s obligations “are somehow alleviated by the Commonwealth’s broader ‘policy goal.’” Nor did I say you have “refused to collaborate in good faith.” This is the thrust of our challenge here. Even the things I put in writing are taken to mean something other than what they plainly state and then the mischaracterization is repeated back as if it is something I wrote. To be clear, I’m not saying it’s bad faith. I don’t tend to ascribe conduct to ill will without very strong evidence. But my hope is that pointing this out will lead to more productive discussions, to the extent we have any.

As for a meet-and-confer, I’m still not clear on the need for one. We do not believe that you have identified a violation of the Court’s order. And it appears that we just interpret the Court’s order differently if you believe the Commonwealth has violated it without denying registration to an eligible voter. Nonetheless, if there are good times to talk Tuesday or Thursday afternoon, please let me know.

Regards,
Tillman



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From: Amadi, Brittany <Brittany.Amadi@wilmerhale.com>
Sent: Wednesday, June 10, 2026 8:13 AM
To: Breckenridge, Tillman J. <TBreckenridge@oag.state.va.us>; Saini, Ajay P. <ASaini@oag.state.va.us>; Davenport, Jae K. <JKDavenport@oag.state.va.us>
Cc: eheilman@acluva.org; Werle, Nick <Nick.Werle@wilmerhale.com>; jared.davidson@protectdemocracy.org; Liss, Jason H <Jason.Liss@wilmerhale.com>; vagraharkar@acluva.org; Harper, Adam Ellis <Adam.Harper@wilmerhale.com>
Subject: RE: King v. O'Bannon, No. 3:23-cv-408-JAG (E.D. Va.)

Tillman,

Although we will not respond to each point raised in your email below, needless to say, we disagree with your characterizations of both the parties' prior communications and the Court's Order. The Order requires Defendants to take affirmative steps to ensure that voter registrations are not improperly denied or cancelled. Those obligations have not been satisfied, and Defendants' suggestion that those obligations are somehow alleviated by the Commonwealth's broader "policy goal" is plainly incorrect. We further disagree with your suggestion that Plaintiffs have refused to collaborate in good faith. It was Defendants—not Plaintiffs—who unilaterally cut off further communications several weeks ago, despite Plaintiffs' repeated efforts to collaborate with Defendants toward successful implementation of the Court's Order.

We renew our request made on Friday for a meet and confer to discuss the issues raised in Plaintiffs' June 4, 2026 letter pursuant to Local Civil Rule 7(E). We are available on Thursday (anytime other than 4-6 ET) or Friday (any time other than 12:30-2 ET) this week. Please confirm when within those windows Defendants are available or propose an alternative time.

Best,

Brittany

From: Breckenridge, Tillman J. <TBreckenridge@oag.state.va.us>
Sent: Monday, June 8, 2026 10:46 AM
To: Amadi, Brittany <Brittany.Amadi@wilmerhale.com>; Saini, Ajay P. <ASaini@oag.state.va.us>; Davenport, Jae K. <JKDavenport@oag.state.va.us>
Cc: eheilman@acluva.org; Werle, Nick <Nick.Werle@wilmerhale.com>; jared.davidson@protectdemocracy.org; Liss, Jason H <Jason.Liss@wilmerhale.com>; vagraharkar@acluva.org; Harper, Adam Ellis <Adam.Harper@wilmerhale.com>

Subject: RE: King v. O’Bannon, No. 3:23-cv-408-JAG (E.D. Va.)

EXTERNAL SENDER

Brittany, we have received your letter. The Office of the Attorney General disagrees with your mischaracterization of the Order’s requirements in this case and with the implication that the extension of time somehow expanded the Order’s requirements. We and ELECT have worked in good faith to comply with the Order, though we appreciate you identifying the clarifications needed on ELECT’s website, which have been addressed. As to your other allegations:

1. we are unaware of any eligible voters who have been denied registration. If you could please identify them, we would appreciate it, as we want everything done correctly. In the example you gave regarding Mr. King, you ultimately stated that the registration had not yet been processed; thus, it has not been denied. As to the mis-informed registrar’s office employee, ELECT has addressed that office and further clarified requirements with it;
2. we are unaware of any voters who have been denied registration based on the individual crimes you identify in Part I.C.. If you identify any such individuals we would be willing to meet and confer over whether such individuals should be permitted to register consistent with the Order and the Constitution of Virginia.

Your accusation that “Defendants’ actions are inconsistent with [prior] representations” is plain false, and we request that the ACLU of Virginia, which purports to have interest in collaboration, refrain from continued false accusations against the Commonwealth and its officials. The invective you have included in your filings and letters and false statements made in press releases are not constructive, and they indicate that good faith collaboration with you may not be possible. We remain open to good faith discussions on ways to improve our processes moving forward with you or anyone else who wishes to engage with ELECT or its representatives here at the Office of the Attorney General in a constructive manner as this Office continues to work toward the Commonwealth’s established policy goal that all convicted felons who have completed their sentences be re-enfranchised.

Regards,
Tillman



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From: Amadi, Brittany <Brittany.Amadi@wilmerhale.com>
Sent: Thursday, June 4, 2026 9:14 PM
To: Breckenridge, Tillman J. <TBreckenridge@oag.state.va.us>; Saini, Ajay P. <ASaini@oag.state.va.us>; Davenport, Jae K. <JKDavenport@oag.state.va.us>
Cc: eheilman@acluva.org; Amadi, Brittany <Brittany.Amadi@wilmerhale.com>; Werle, Nick <Nick.Werle@wilmerhale.com>; jared.davidson@protectdemocracy.org; Liss, Jason H <Jason.Liss@wilmerhale.com>; vagraharkar@acluva.org; Harper, Adam Ellis <Adam.Harper@wilmerhale.com>
Subject: King v. O’Bannon, No. 3:23-cv-408-JAG (E.D. Va.)

Counsel,

Please see the attached correspondence. As requested in the letter, please let us know your availability to meet and confer early next week. Thank you.

Best,
Brittany

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