

IN THE MATTER OF

**Georgia State Conference of the
NAACP, et al
vs
Kemp**

Transcript of Deposition of

Gina H. Wright

On November 20, 2017

*Reported by Joel P. Moyer
Certified Court Reporter*



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THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

GEORGIA STATE CONFERENCE OF THE NAACP,
as an organization; LVELLE LEMON, MARLON
REID, LAURETHA CELESTE SIMS, PATRICIA
SMITH, COLEY TYSON,
NAACP Plaintiffs,

AUSTIN THOMPSON, WAYNE SWANSON, DARRYL PAYTON,
AUDRA CUNNINGHAM, SABRINA MCKENZIE, JAMIDA
ORANGE, ANDREA SNOW, SAMMY ARREYMBI, LYNNE
ANDERSON, CORETTA JACKSON,
Thompson Plaintiffs,

vs. CASE NO. 1:17-cv-01427-TCB-WSD-BBM

BRAIN KEMP, in his official capacity as
Secretary of the State for the State of
Georgia,
Defendant.

- - -

30(b)(6) Deposition of
Georgia Legislative & Congressional
Reapportionment Office,
through GINA H. WRIGHT,

Taken by Jon M. Greenbaum,

Before Joel P. Moyer,
Certified Court Reporter,

At the Offices of
Strickland Brockington Lewis LLP,
Atlanta, Georgia,

On Monday, November 20, 2017,
Beginning at 9:37 a.m. & ending at 5:17 p.m.

- - -

Volume of Testimony
(Exhibits Contained in Separate Volume)

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15

16 (End of Index)
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10	<p>1 November 20, 2017</p> <p>2 9:37 a.m.</p> <p>3 (Whereupon the reporter provided a written</p> <p>4 disclosure to all counsel pursuant to</p> <p>5 Article 8.B. of the Rules and Regulations</p> <p>6 of the Board of Court Reporting.)</p> <p>7 THE VIDEOGRAPHER: We are now on</p> <p>8 video record. This is the beginning of file</p> <p>9 number one. The date is November --</p> <p>10 MR. WILL: 20th.</p> <p>11 THE VIDEOGRAPHER: -- 20th, 2017.</p> <p>12 The time is 9:37 a.m.</p> <p>13 THE COURT REPORTER: Swear in the</p> <p>14 witness?</p> <p>15 MR. GREENBAUM: Yes.</p> <p>16 GINA H. WRIGHT,</p> <p>17 being first duly sworn, was examined and</p> <p>18 testified as follows:</p> <p>19 EXAMINATION</p> <p>20 BY MR. GREENBAUM:</p> <p>21 Q Good morning, Ms. Wright.</p> <p>22 A Good morning.</p> <p>23 Q I introduced myself to you a few</p> <p>24 minutes ago. My name is Jon Greenbaum. I'm</p> <p>25 one of the attorneys representing the Georgia</p>	12
11	<p>1 NAACP in the case involving the Georgia</p> <p>2 redistricting plan. Good morning.</p> <p>3 A Good morning.</p> <p>4 Q Have you ever had your deposition</p> <p>5 taken before?</p> <p>6 A Yes, I have.</p> <p>7 Q On how many occasions?</p> <p>8 A Two or three.</p> <p>9 Q Two or three? Were they -- did they</p> <p>10 all relate to professional, your job?</p> <p>11 A Yes.</p> <p>12 Q Could you describe each time you've</p> <p>13 had your deposition taken?</p> <p>14 A The most recent was a local</p> <p>15 redistricting case where I was the technical</p> <p>16 expert for a federal judge. That was the</p> <p>17 Fayette County case.</p> <p>18 Very further back, I think the</p> <p>19 Larios case in 2004. And I'm not sure if there</p> <p>20 were any others.</p> <p>21 Q Okay. And in the Fayette County</p> <p>22 case, is it correct that you didn't represent</p> <p>23 any party, that the judge had appointed you as</p> <p>24 an, as an expert --</p> <p>25 A That's correct.</p>	13
10	<p>1 Q -- for the maps? For the remedy in</p> <p>2 the case?</p> <p>3 A Yes.</p> <p>4 Q And then in the Larios county case,</p> <p>5 were you deposed on -- were you representing</p> <p>6 the part of the State in that case, or what was</p> <p>7 your role?</p> <p>8 A I was a member of the staff, and the</p> <p>9 staff that worked on various proposals were all</p> <p>10 deposed.</p> <p>11 Q And that had to do with statewide</p> <p>12 redistricting in Georgia?</p> <p>13 A Yes.</p> <p>14 Q Which plans were at issue in Larios?</p> <p>15 A The State House and State Senate.</p> <p>16 Q And what was your role with respect</p> <p>17 to the State House plan?</p> <p>18 A As staff, we worked with various</p> <p>19 members of the General Assembly. My role was</p> <p>20 pretty minimal at that point.</p> <p>21 Q So you wouldn't consider yourself to</p> <p>22 be a primary map drawer of those plans?</p> <p>23 A In 2004?</p> <p>24 Q Yes.</p> <p>25 A No.</p>	13

14	<p>1 Q One thing you're doing a good job</p> <p>2 of so far is we're not talking over each</p> <p>3 other. It's very important in terms of</p> <p>4 getting a clear record that I finish asking</p> <p>5 the question, even if you think you know where</p> <p>6 I'm going, before you answer and that I let</p> <p>7 you finish your answer before I ask the next</p> <p>8 question. Do you understand that?</p> <p>9 A Yes.</p> <p>10 Q Okay. Is there any reason why your</p> <p>11 deposition can't be taken today?</p> <p>12 A Not that I know of.</p> <p>13 (Whereupon a document was identified</p> <p>14 as Plaintiff's Exhibit 1.)</p> <p>15 Q Okay. Great. So I'm going to show</p> <p>16 you a document or, actually, I'm going to show</p> <p>17 you -- I'm going to show you some documents</p> <p>18 that were produced to us from Mr. Will last</p> <p>19 Friday. And I'm going to be asking you</p> <p>20 questions about these documents as a whole in</p> <p>21 a couple minutes, and I'm also going to be</p> <p>22 asking you during the course of the deposition</p> <p>23 about a number of the documents that are</p> <p>24 contained within that.</p> <p>25 And I want to go back for a second</p>	16
15	<p>1 and I want to mark as Exhibit 1 a document</p> <p>2 entitled Subpoena to Testify at a Deposition in</p> <p>3 a Civil Action.</p> <p>4 MR. WILL: Thank you.</p> <p>5 Q Ms. Wright, do you recognize this</p> <p>6 document?</p> <p>7 A Yes.</p> <p>8 Q Did you receive this document at</p> <p>9 some point in the past?</p> <p>10 A Yes.</p> <p>11 Q Okay. And you notice that on -- if</p> <p>12 you look at the, the top part of the page, it</p> <p>13 has some page numbers on it. If you go to page</p> <p>14 seven, it lists a series of deposition topics.</p> <p>15 And can you talk about your knowledge of topic</p> <p>16 one, which involves the drawing of the</p> <p>17 redistricting plans considered or enacted by</p> <p>18 the Georgia Legislature in Act number 251 in</p> <p>19 2015, HB 566, and HB 515 in 2017.</p> <p>20 A I'm not sure. I don't know what you</p> <p>21 want me to say.</p> <p>22 Q Okay.</p> <p>23 MR. WILL: Nor did I. I was going</p> <p>24 to say --</p> <p>25 Q Okay. Sure. What was, what was</p>	17
16	<p>1 your role with respect to the drawing of the</p> <p>2 redistricting plan in 2015?</p> <p>3 A I worked with members of the General</p> <p>4 Assembly, primarily with the chairman of our</p> <p>5 House committee, to create districts as they,</p> <p>6 you know, were looking to see what they, you</p> <p>7 know, might look like as a part of what would</p> <p>8 make up that bill.</p> <p>9 Q And did you use a particular</p> <p>10 redistricting software in 2015?</p> <p>11 A Yes. Our office uses Maptitude for</p> <p>12 redistricting.</p> <p>13 Q Okay. And in terms of who, who else</p> <p>14 other than you actually physically used the</p> <p>15 Maptitude program in terms of drawing the</p> <p>16 plans?</p> <p>17 A At any time or specifically for</p> <p>18 this?</p> <p>19 Q For what ended up being HB 566.</p> <p>20 A Primarily, me. My staff may have</p> <p>21 met with members to look at options, but as it</p> <p>22 related to what was final and what was put into</p> <p>23 the bill, that would be me.</p> <p>24 Q Okay. At any time in the process in</p> <p>25 2015, did anybody present any maps to you?</p>	17
17	<p>1 A I don't recall that happening.</p> <p>2 Q Okay. And going on to 2017, what</p> <p>3 was your role in terms of the maps that were</p> <p>4 part of HB 515 in 2017?</p> <p>5 A I would say my role was the same.</p> <p>6 We work with members to, you know, draw a draft</p> <p>7 of a district, see what we can do, if that's</p> <p>8 something they want to do or not.</p> <p>9 Q With respect to either HB 566 or HB</p> <p>10 515, were there any alternative maps that you</p> <p>11 drew at any time?</p> <p>12 A As far as for the bill as a whole or</p> <p>13 exactly what --</p> <p>14 Q At any point during the process,</p> <p>15 were you, were you coming up with drafts of</p> <p>16 things that you were showing to members or to</p> <p>17 your staff?</p> <p>18 A Typically, when we work on a plan</p> <p>19 like this that is not a map to redraw the</p> <p>20 entire state, we work with, you know, a member</p> <p>21 and whatever their criteria are, and we work on</p> <p>22 it and work on it and work on it. So there's</p> <p>23 not a multiple string of alternate plans. It's</p> <p>24 a process by which we create what it is that</p> <p>25 they're looking for, so there's not a trail of</p>	17

18	<p>1 alternate plans.</p> <p>2 Q So during this process, I take it</p> <p>3 that you probably -- let's take the 2015 plan.</p> <p>4 You didn't drop -- draw the map in one, the</p> <p>5 revised map, in one sitting, did you?</p> <p>6 A No.</p> <p>7 Q During the course of time, do you</p> <p>8 save drafts of what you're working on?</p> <p>9 A It depends.</p> <p>10 Q And --</p> <p>11 A Typically, I would say no. It just,</p> <p>12 these particular changes that were done were</p> <p>13 usually very small, minimal changes that were</p> <p>14 given -- I was given criteria. If I could try</p> <p>15 to draw something that would be what that</p> <p>16 member was looking for, then I work within that</p> <p>17 particular area to do that.</p> <p>18 So I don't have, like I said before,</p> <p>19 multiple plans because most of these changes</p> <p>20 were not -- if there was another -- like in</p> <p>21 another example, had there been a wide sweep</p> <p>22 change of, you know, totally different</p> <p>23 variation, then, yes, I would say those are</p> <p>24 different plans, but I did not have that happen</p> <p>25 during this process.</p>	20	<p>1 make some proposed changes to 111, you would</p> <p>2 have, you would have a series of -- if they</p> <p>3 existed, you would have a series of files all</p> <p>4 related to 111?</p> <p>5 A Yes. If they existed, I would have</p> <p>6 a plan perhaps named whatever I named it with a</p> <p>7 one or a two or whatever in his particular</p> <p>8 folder that would be designated as his work</p> <p>9 which would be private for him.</p> <p>10 Q Okay. And let's say, let's say --</p> <p>11 let's take 111 again as an example, and let's</p> <p>12 say that that member wanted to have changes in</p> <p>13 2015 and wanted to have changes again in 2017</p> <p>14 and there were multiple drafts of that. Would</p> <p>15 that all be -- would those drafts all be under</p> <p>16 the 111 folder, or would there be a separation</p> <p>17 based on what year it was?</p> <p>18 A It would all be under 111.</p> <p>19 Q Okay. I want to move on next and</p> <p>20 ask you -- you mentioned a couple minutes ago</p> <p>21 that you -- you referenced redistricting</p> <p>22 criteria and taking into account redistricting</p> <p>23 criteria when you're drawing a plan.</p> <p>24 Can you tell me what the</p> <p>25 redistricting criteria was with respect to the</p>
19	<p>1 Q Were there any -- so at no time did</p> <p>2 you save a version and then you went on and</p> <p>3 started a new version or revised version?</p> <p>4 A There could have been one or two</p> <p>5 versions like that for a specific area, not for</p> <p>6 the whole bill as a whole, no.</p> <p>7 But if in one area there were two</p> <p>8 options that they looked at, then there may be</p> <p>9 two different plans that would be, basically</p> <p>10 just that area to those two districts or</p> <p>11 however many districts, there would be a</p> <p>12 different version for that.</p> <p>13 Q And are there particular -- do you,</p> <p>14 do you create a system of organizing plans so</p> <p>15 that when you go back to when you're working on</p> <p>16 a set of changes related to a plan that they're</p> <p>17 all kept in some electronic folder?</p> <p>18 A The organization in our system is by</p> <p>19 member numbers.</p> <p>20 Q Okay.</p> <p>21 A So it's through -- whatever that</p> <p>22 particular member works on, work is saved into,</p> <p>23 into their library.</p> <p>24 Q Okay. So if you, if you were -- if,</p> <p>25 let's say, the house member in 111 asked you to</p>	21	<p>1 2015 house plan?</p> <p>2 A Sure. All redistricting that we</p> <p>3 ever do is to comply with all state and federal</p> <p>4 law, which would include the Voting Rights Act.</p> <p>5 It would also include criteria such as</p> <p>6 contiguity, compactness, keeping</p> <p>7 counties/precincts whole as much as possible,</p> <p>8 communities of interest, if that's something</p> <p>9 that we can take into account. Further down</p> <p>10 would be incumbency. Those types of issues are</p> <p>11 always kind of at the -- on the list but lower</p> <p>12 down.</p> <p>13 Q And with respect to the changes in</p> <p>14 2015, what were you told that house members</p> <p>15 wanted to do?</p> <p>16 A It varied in terms of which house</p> <p>17 member I was talking to --</p> <p>18 Q Okay.</p> <p>19 A -- or who, you know, had spoken with</p> <p>20 our chairman. So it would have to -- you would</p> <p>21 have to be specific on --</p> <p>22 Q Sure. Let's start with the, with</p> <p>23 the changes in Gwinnett County 104 and 105.</p> <p>24 What were you told the House members wanted to</p> <p>25 achieve?</p>

22	<p>1 A They were looking for a political 2 advantage to see if there was any way to, 3 give any political boost to District 105. 4 Q How about with respect to 111? 5 A The same. 6 Q With respect to District 105, who 7 talked to you about trying to create a 8 political advantage? 9 A At the first conversation that I 10 ever had, I believe was with Representative 11 Chandler, and that would have been prior to the 12 '14 election, so it was further back. I 13 believe at some point I spoke with Chairman 14 Nix. 15 Q Anyone else with respect to 105? 16 A Probably Representative Efration. 17 Q And why would you have probably 18 spoken to Representative Efration? 19 A His district was the district 20 adjoining Representative Chandler's, so any 21 change we made would be between the two members 22 and would have impacted his district. 23 Q And then with respect to Chairman 24 Nix, do you recall your first conversation with 25 Chairman Nix about District 105 being before or</p>	24	<p>1 conversations about District 105 with 2 Representative Chandler, anybody else, was the 3 issue of the changing demographics in Gwinnett 4 County brought up? 5 A Can you repeat that again -- 6 Q Yes. 7 A -- the beginning? 8 Q Sure. In the course of the whole 9 process of making changes to District 105, did 10 anybody reference the changing demographics 11 within Gwinnett County? 12 A Yes. 13 Q Do you recall who referenced the 14 changing demographics of Gwinnett County? 15 A Most likely me. 16 Q And what is your understanding about 17 the changing demographics in Gwinnett County? 18 A Well, you can look at political 19 data. You can look at a lot of other data that 20 shows from different election cycles that some 21 of the areas in the county that used to vote 22 Republican are now voting Democratic. 23 You can see that moving across, even 24 if you look at the most recent election data 25 throughout the county, so that's an indicator</p>
23	<p>1 after the 2014 election? 2 A I don't recall. 3 Q It could have been either one? 4 A I don't recall. 5 Q All right. So your -- so you do 6 know -- you did testify a minute ago that your 7 first conversation with Representative Chandler 8 was prior to the 2014 election; correct? 9 A That's correct. 10 Q And do you recall where that 11 conversation took place? 12 A In my office. I say that. We had 13 an email as well, but I think she came to my 14 house before there was an email, but you've 15 seen that email I think, so. 16 Q Okay. And do you recall the 17 substance of what Representative Chandler told 18 you during that conversation? 19 A I don't remember the details. 20 Q Do you remember anything -- I take 21 it part of the conversation was about her 22 trying to maximize the chances of her being 23 able to retain her seat; is that correct? 24 A Yes. 25 Q During the course of the</p>	25	<p>1 that there's change going, you know, going on 2 throughout the county definitely in that 3 respect. 4 Q And do you look at race data as 5 well? 6 A I do. 7 Q And is there any correlation between 8 the race data and the political data? 9 A Well, the data that we have in our 10 system to use for redistricting is solely from 11 the 2010 census, so the most recent comparison 12 we would be able to make would be from 2010 to 13 2000. And you can definitely see changes in 14 that particular data from 2010 to 2000 in the 15 changes in the demographics at that point. I 16 don't have data on race that is newer than 17 that. 18 Q Now, is it your understanding that 19 Georgia keeps voter registration and turn-out 20 data by race? 21 A Yes, I think so. 22 Q And is that something that you or 23 anybody in your office looks at when, when 24 looking at trying to create redistricting 25 plans?</p>

26	<p>1 A That is part of -- when we create a</p> <p>2 precinct layer that we work on, we have a</p> <p>3 precinct file we update every two years to</p> <p>4 correspond to the general election, and that</p> <p>5 data is a part of that file. So it is built in</p> <p>6 to our political data layer that we can use in</p> <p>7 our system, so it is there. It can be looked</p> <p>8 at, yeah, sure.</p> <p>9 Q So what, what political, what</p> <p>10 political data do you look at in your system on</p> <p>11 Maptitude?</p> <p>12 A When we pull in political data that</p> <p>13 we get from the Secretary of State's office,</p> <p>14 what we are doing is matching that to -- those</p> <p>15 precinct codes to what precinct codes we have</p> <p>16 in our geographic layer that we correct with</p> <p>17 the counties to accurately represent what they</p> <p>18 have for their voting precincts so we can keep</p> <p>19 that up to date. For an overarching reason is</p> <p>20 to keep us up with when we have to update with</p> <p>21 the Census Bureau every decade. That keeps us</p> <p>22 on pace.</p> <p>23 What we do is pull files from that.</p> <p>24 The data that we use is always statewide</p> <p>25 contested races, and we pull those in to match</p>	28
27	<p>1 with the precincts because those are races that</p> <p>2 are across the board for the entire state. So</p> <p>3 it's a balanced look at how the state voted as</p> <p>4 a whole by precinct.</p> <p>5 Q Okay. I'm going to come back to</p> <p>6 this a little bit later on in the, in the</p> <p>7 deposition. I want to move now to District 111</p> <p>8 in 2015. Who did you have conversations with</p> <p>9 in terms of District 111?</p> <p>10 A Throughout the process or at what</p> <p>11 point?</p> <p>12 Q At any point during the process.</p> <p>13 A I spoke with all the members there</p> <p>14 that were involved in having their district</p> <p>15 affected by any change. So that would be -- do</p> <p>16 you want me to name them, or do you know?</p> <p>17 Q Why don't you go ahead and name them</p> <p>18 for the record.</p> <p>19 A Representative Rutledge.</p> <p>20 Representative Welch.</p> <p>21 Q Oh, and sorry to interrupt you.</p> <p>22 When you say their names, can you say the</p> <p>23 district as well that they represent?</p> <p>24 A Okay. Representative Rutledge is</p> <p>25 109. This is like a quiz. Representative</p>	29
26	<p>1 Welch is 110. Representative Strickland is</p> <p>2 111. Representative Knight was 130.</p> <p>3 Representative Yates was 73. And I would be</p> <p>4 certain that I spoke with Chairman Nix on that</p> <p>5 too, and his number was 69, I think.</p> <p>6 Q Okay. And in, in communicating with</p> <p>7 these representatives, what did they tell you?</p> <p>8 What did they tell you that they wanted to try</p> <p>9 to accomplish or avoid? Let's start with, so</p> <p>10 you mentioned before trying to maintain -- that</p> <p>11 the purpose of this was trying to maintain</p> <p>12 political advantage; correct?</p> <p>13 A Yes.</p> <p>14 Q And would it be fair to say that the</p> <p>15 goal was for Representative Strickland in 111</p> <p>16 to be able to maintain his seat?</p> <p>17 A Yes.</p> <p>18 Q And Representative Yates, Rutledge,</p> <p>19 Welch, and Knight are also white Republicans</p> <p>20 who have portions of their districts in Henry</p> <p>21 County; correct?</p> <p>22 A Correct.</p> <p>23 Q And was the goal to -- and, and the</p> <p>24 plan that was passed in 2015 affected all five</p> <p>25 of those districts; correct?</p>	28
27	<p>1 A Correct.</p> <p>2 Q And would it be fair to say that</p> <p>3 what you were trying to also accomplish in</p> <p>4 improving the likelihood that Representative</p> <p>5 Strickland would be reelected would be to not</p> <p>6 do any harm in terms of the likelihood that</p> <p>7 Representatives Yates, Rutledge, Welch, and</p> <p>8 Knight would not be reelected?</p> <p>9 A I think I understood that question,</p> <p>10 and I think that's yes, if you're saying we</p> <p>11 didn't want to politically harm those other</p> <p>12 districts as well. Is that what you're asking?</p> <p>13 Q Uh-huh (affirmative).</p> <p>14 A Yes, that's correct.</p> <p>15 Q And in doing so, did you look at</p> <p>16 political data?</p> <p>17 A Yes.</p> <p>18 Q Did you also look at racial data?</p> <p>19 A Racial data, when I worked on both</p> <p>20 of these districts, was not the first thing</p> <p>21 that I ever looked at. It was something that I</p> <p>22 did consider down the line, but all of these</p> <p>23 criteria were, you know, in a particular order</p> <p>24 that I usually review when I'm working on</p> <p>25 something.</p>	29

30	<p>1 Since my objective was to make these</p> <p>2 districts, if at all possible anyway, better</p> <p>3 for these incumbents to get reelected, then</p> <p>4 that political data was my primary objective to</p> <p>5 look at. To say that I never looked at race</p> <p>6 data, no, I did eventually look at it to make</p> <p>7 sure that I did not do significant harm in that</p> <p>8 respect as well. So, yes, I did look at race</p> <p>9 data.</p> <p>10 Q What do you mean by significant harm</p> <p>11 in that respect?</p> <p>12 A Well, throughout my years of drawing</p> <p>13 maps, obviously, you wouldn't want to do</p> <p>14 anything that would make a significant change</p> <p>15 for a district. These districts were in the</p> <p>16 30-percent range, I would say, for their</p> <p>17 African-American population, so you wouldn't</p> <p>18 want to take it down to, say, 10 percent,</p> <p>19 obviously. There's -- that's clearly doing</p> <p>20 something, you know, moving up, people who live</p> <p>21 in that area, too much.</p> <p>22 But any time you make a change to a</p> <p>23 district in order to make changes in the</p> <p>24 population, you're going to make changes in the</p> <p>25 numbers, so you want to just review those</p>	32	<p>1 races locally, you can see that the districts</p> <p>2 that are majority-minority districts tend to</p> <p>3 elect Democratic candidates.</p> <p>4 Q Okay. And the districts that are,</p> <p>5 let's say, 65 percent or more white tend to</p> <p>6 elect Republican candidates?</p> <p>7 A On the current map, that would</p> <p>8 probably be true.</p> <p>9 Q Okay. And you were aware of that</p> <p>10 when you redrew the map in 2015; correct?</p> <p>11 A Yes.</p> <p>12 Q Okay. Now I want to move on to</p> <p>13 Exhibit B, which is on page eight of -- I'm</p> <p>14 sorry. Exhibit B of Exhibit 1, so page eight</p> <p>15 of Exhibit 1, the very next page. Do you see</p> <p>16 where I'm looking at?</p> <p>17 A I do.</p> <p>18 Q Okay. And these were documents that</p> <p>19 you were or that your office was asked to</p> <p>20 produce with respect to this deposition. Is</p> <p>21 that your understanding?</p> <p>22 A Yes.</p> <p>23 Q And what did, what did your office</p> <p>24 do to look for documents that would be</p> <p>25 responsive to Exhibit B?</p>
31	<p>1 numbers and make sure they are comparable to</p> <p>2 where you started from.</p> <p>3 Q You also didn't want to -- you also</p> <p>4 didn't want to make the districts more black;</p> <p>5 correct?</p> <p>6 A I'm sorry?</p> <p>7 Q You also didn't want to make the</p> <p>8 district, any of the districts, let's say,</p> <p>9 40-percent black?</p> <p>10 A That was never told to me.</p> <p>11 Q Is that something that you</p> <p>12 considered when you're drawing these plans?</p> <p>13 A I'm not sure I understand exactly</p> <p>14 what you're asking me.</p> <p>15 Q Sure. Well, let me ask a different</p> <p>16 question. Is there any correlation between</p> <p>17 race and partisanship in Georgia?</p> <p>18 A There have been studies of that, and</p> <p>19 they seem to show that there is some</p> <p>20 correlation. I don't have any evidence in my</p> <p>21 hand that I can say this defines it completely.</p> <p>22 It's all speculation.</p> <p>23 Q What's your understanding of what</p> <p>24 that correlation is?</p> <p>25 A Well, if you look across any of the</p>	33	<p>1 A For the first portion with the shape</p> <p>2 files, we went through the libraries of the</p> <p>3 affected members, anything we had related to</p> <p>4 these two bills that were considered or</p> <p>5 enacted, saved them to a folder so they could</p> <p>6 be burned to a CD.</p> <p>7 Second portion, I contacted my</p> <p>8 staff, had them review their emails for</p> <p>9 anything related to what this asks for within</p> <p>10 Gwinnett or Henry counties for the House</p> <p>11 districts and the members and anyone else who</p> <p>12 may have asked for anything related to that</p> <p>13 since that date, had them save them to a</p> <p>14 folder, burn them to a CD.</p> <p>15 Q Okay. Oops. Just a second.</p> <p>16 All right. Now I'm going back to</p> <p>17 that other stack of documents that I showed you</p> <p>18 earlier.</p> <p>19 A Okay.</p> <p>20 Q Do you have any sense in terms of</p> <p>21 what the volume was of documents that you</p> <p>22 provided with respect to Exhibit B, question</p> <p>23 two?</p> <p>24 A What do you mean in terms of volume?</p> <p>25 Q Well, in front of you, you've got</p>

34	<p>1 about 200 pages worth of documents that I'm</p> <p>2 trying to, trying to figure out how to get</p> <p>3 confirmation that, that that is what you</p> <p>4 provided to your counsel to provide to us.</p> <p>5 A I never printed it, so I wouldn't</p> <p>6 know --</p> <p>7 Q Okay.</p> <p>8 A -- what it would constitute in terms</p> <p>9 of a paper stack, so, I mean, do you want me to</p> <p>10 go through the whole stack?</p> <p>11 Q Probably, probably not. I don't</p> <p>12 think that would be very good use of your time.</p> <p>13 I might ask your counsel a question about it</p> <p>14 during, during the break.</p> <p>15 A Okay.</p> <p>16 Q During the course of the deposition,</p> <p>17 I'm going to be pulling -- I'm going to ask you</p> <p>18 to pull out some of the pages from that stack</p> <p>19 as we get into the deposition, and I'm asking</p> <p>20 you questions --</p> <p>21 A Okay.</p> <p>22 Q -- related to some of the</p> <p>23 communications that were in there.</p> <p>24 In terms of going back to number one</p> <p>25 in Exhibit B, do you recall there being any</p>	36	<p>1 Q Okay. So your office hasn't moved</p> <p>2 from 2000 to 2017?</p> <p>3 A No.</p> <p>4 Q And you mentioned before that it was</p> <p>5 contracted through the University of Georgia.</p> <p>6 Was there a component of the University of</p> <p>7 Georgia that the office was part of?</p> <p>8 A Yes. They were -- we were</p> <p>9 underneath the division called ITOS,</p> <p>10 Information Technology Outreach Services, and</p> <p>11 then sometime during those years, I couldn't</p> <p>12 tell you which year it was, the whole ITOS</p> <p>13 division was moved under the Vincent Institute</p> <p>14 of Government.</p> <p>15 Q Now, at the time you went to, first</p> <p>16 went to work in the Reapportionment Office, who</p> <p>17 was the executive director at the time?</p> <p>18 A Linda Meggers.</p> <p>19 Q And who else worked in the office</p> <p>20 when you were first there?</p> <p>21 A Let's see. Joe Stanton, Rob</p> <p>22 Strangia, Shantée El, Angela Kennedy, Heather</p> <p>23 Hammond.</p> <p>24 Q Okay. And Mr. Stanton, what was his</p> <p>25 role in the office?</p>
35	<p>1 alternative plans in the folders of the</p> <p>2 legislators that you burned to the CD?</p> <p>3 A There were some, yes.</p> <p>4 (Whereupon a document was identified as</p> <p>5 Plaintiff's Exhibit 2.)</p> <p>6 Q Okay. All right. All right. I'm</p> <p>7 going to go back in time a little bit and go</p> <p>8 through your professional history now. I'm</p> <p>9 going to mark as Exhibit 2 what appears to be</p> <p>10 your LinkedIn profile; is that correct?</p> <p>11 A That's correct.</p> <p>12 Q And so you went to work doing</p> <p>13 redistricting out of college?</p> <p>14 A Yes.</p> <p>15 Q And at the time you started doing</p> <p>16 redistricting for Georgia, where were you</p> <p>17 working out of? Were you working in Atlanta?</p> <p>18 A Yes.</p> <p>19 Q And were you working for the Georgia</p> <p>20 General Assembly at the time?</p> <p>21 A Yes. At the time our office was</p> <p>22 contracted through the University of Georgia;</p> <p>23 however, we served the Georgia General</p> <p>24 Assembly, so our office was in the same place</p> <p>25 that it is now.</p>	37	<p>1 A He was the assistant director.</p> <p>2 Q And is it correct to say that</p> <p>3 Ms. Meggers and Mr. Stanton don't work in the</p> <p>4 office anymore?</p> <p>5 A That's correct.</p> <p>6 Q Do you recall about at what point</p> <p>7 Ms. Meggers left?</p> <p>8 A She left in January of 2005.</p> <p>9 Q And how about Mr. Stanton?</p> <p>10 A I would say it was summer of that</p> <p>11 same year.</p> <p>12 Q And when Ms. Meggers left, who</p> <p>13 became the executive director of the office?</p> <p>14 A We had a time period where we really</p> <p>15 didn't have one for a while, but following</p> <p>16 that, when they hired someone, Shantée El was</p> <p>17 named the director.</p> <p>18 Q And is it correct that Ms. El</p> <p>19 doesn't work in the office anymore?</p> <p>20 A That's correct.</p> <p>21 Q Do you recall when about she left?</p> <p>22 A I think it was the end of 2012.</p> <p>23 Q Was there a period of time in which</p> <p>24 the executive director became Jimmy McDonald?</p> <p>25 A Yes.</p>

38	<p>1 Q Do you recall when Jimmy McDonald 2 came in? 3 A That would have been the beginning 4 of 2011. 5 Q So Ms. El continued to work in the 6 office in 2011 and much of 2012, but now she 7 was under Mr. McDonald? 8 A Yes. 9 Q And Mr. Strangia still works in the 10 office; correct? 11 A Yes. 12 Q What is his role? 13 A He is my GIS manager. 14 Q Is he drawing maps as part of that 15 job? 16 A Typically, no. 17 Q He is more of what would be your 18 tech person? 19 A More or less, yes. 20 Q Okay. And then what did Ms. Kennedy 21 do? 22 A She was a redistricting analyst, 23 worked with members, worked with county 24 governments and local governments. 25 Q And how about Ms. Hammond?</p>	40	<p>1 that correct? 2 A The districts that were being -- I 3 don't know what the correct word is -- that 4 were being disputed or whatnot in that case, 5 yes, because those were the maps that had been 6 adopted prior to that, you know, cycle. That 7 would have been maps from '02, '01 and '02 that 8 had been put into place. So during that time 9 period, yes, I would say my role was very 10 minor. 11 As far as related to the case 12 itself, the staff worked with -- of course, in 13 that case they had a special master and his 14 technical expert who worked on the plans who 15 weren't from Georgia, and we worked as staff to 16 kind of help them know a little bit about 17 where -- Georgia and to know where things were 18 and to kind of help them with the basics. 19 I also for that case took the 20 special master's plan and went through it to 21 basically try to make corrections, technical 22 corrections, to it because they focused 23 primarily on city limit lines and used a lot of 24 city limit lines for district boundaries, which 25 city limits in Georgia are probably to most</p>
39	<p>1 A She was our person who answered the 2 phone, administrative assistant. 3 Q Now, going back to Exhibit 2, the 4 LinkedIn page, in terms of, in terms of the 5 executive director on your profile, you don't 6 have any text below that, but underneath 7 redistricting services specialist, you have 8 about five lines of text; correct? 9 A Uh-huh (affirmative). 10 Q And were those the duties that you 11 performed when you were the redistricting 12 service specialist, services specialist? 13 A Yes. 14 Q Okay. One of the things that you 15 mentioned in there is that you created 16 redistricting plans for statewide and local 17 district maps. What was the first time that 18 you had a significant role in drawing a 19 statewide map? 20 A Well, that would depend on how you 21 define a significant role. 22 Q Okay. So let's go back to 2004 in 23 the Larios case. You said, you said that your 24 role in terms of that redistricting plan that 25 was at issue there was relatively minor; is</p>	41	<p>1 election supervisors of lesser importance than, 2 say, the precinct boundary lines. 3 So I went through that plan to try 4 and fix it to the point of moving the lines 5 from city lines to precinct lines where I could 6 to make it, you know, a little bit more 7 efficient for our county election 8 administrators to handle. 9 And that plan was presented as an 10 option, but it was not accepted. I believe, I 11 believe Dennis Dunn I worked with on that who 12 is one of the assistant attorney generals now. 13 Q Okay. And eventually Georgia had a 14 new House plan that was created in 2006? 15 A No. It was created in 2004 as a 16 result of the case. 17 Q Okay. So the plan was created in 18 2004. Was it first in effect in 2006? 19 A No. It was in effect in 2004. 20 Q Okay. And then there was another 21 plan that came into effect in 2006? 22 A No. Well, the 2006 map, both in the 23 House and Senate, were slight adjustments that 24 the members made to the court drawn plan. I 25 think in the Senate it was only in one area.</p>

42	<p>1 In the House, I believe it was in three areas.</p> <p>2 Q Okay. All right. Next on your</p> <p>3 profile it says that you "Maintained a current</p> <p>4 statewide precinct file for all 159 counties in</p> <p>5 Georgia through frequent contact with county</p> <p>6 election supervisors."</p> <p>7 Is that something that you did in</p> <p>8 your role as a redistricting services</p> <p>9 specialist?</p> <p>10 A Yes.</p> <p>11 Q And then it says you "Coordinated</p> <p>12 the Block Boundary Suggestion Program for the</p> <p>13 US Census Bureau in preparation for the 2010</p> <p>14 census for Georgia." Did you do that?</p> <p>15 A Yes.</p> <p>16 Q And what did that entail?</p> <p>17 A We worked through all 159 counties</p> <p>18 using the geography provided from the Bureau to</p> <p>19 get down to the geographic layer in the blocks</p> <p>20 and make corrections where there needed to be</p> <p>21 corrections within each county. It's very</p> <p>22 technical and very detailed.</p> <p>23 We would find areas where it would</p> <p>24 be on a railroad, it would jump off the</p> <p>25 railroad onto something else, the block</p>	44	<p>1 A A VTD is a voting district as</p> <p>2 defined by the Census Bureau. For us, it</p> <p>3 corresponds with voting precincts.</p> <p>4 We are -- we submit to the Bureau</p> <p>5 whatever files we want to use for our VTDs. We</p> <p>6 try to submit the most recent file that we have</p> <p>7 so that when that is -- the data is allocated</p> <p>8 to those VTDs that it is at least as close to</p> <p>9 the most current precinct layer that we have at</p> <p>10 that point in time.</p> <p>11 But they do not change throughout</p> <p>12 the decade. The VTDs from the Bureau are still</p> <p>13 the VTDs as they are in the year that ended in</p> <p>14 zero for the file.</p> <p>15 Q So the VTDs don't change?</p> <p>16 A Correct.</p> <p>17 Q After the, after the decade begins?</p> <p>18 A Correct.</p> <p>19 Q So the VTD in 2010 would be the same</p> <p>20 as the VTD in 2016?</p> <p>21 A If you're referring to the census,</p> <p>22 how the Census Bureau defines it, yes.</p> <p>23 Q But one of the things that may</p> <p>24 happen in Georgia is that election officials</p> <p>25 may want to adjust the boundaries of a precinct</p>
43	<p>1 boundary, that is, and then it would come back</p> <p>2 onto the railroad. So we wanted to make a</p> <p>3 continuous feature -- make corrections so that</p> <p>4 we would have continuous features. Features</p> <p>5 that are no longer there, we would want to</p> <p>6 remove, you know, such as a dried up creek bed</p> <p>7 or a railroad that was destroyed or whatever,</p> <p>8 things like that.</p> <p>9 Q And so you would take that</p> <p>10 information that, that you received from the</p> <p>11 counties and suggested the census changes in</p> <p>12 the census blocks?</p> <p>13 A Right. Most of the information</p> <p>14 isn't necessarily received from the counties.</p> <p>15 If we, if we had something that the county had</p> <p>16 told us, this is here and we need to have this</p> <p>17 creek -- this river is here and we'll not be</p> <p>18 able to use it, then, yes, we would definitely</p> <p>19 mark those to be changes to the block lines.</p> <p>20 Some of it was just us working down</p> <p>21 to that level and looking for geographical</p> <p>22 differences and things that needed to be</p> <p>23 corrected.</p> <p>24 Q And then what is the -- what's a</p> <p>25 VTD?</p>	45	<p>1 in between censuses; correct?</p> <p>2 A Definitely.</p> <p>3 Q Do you know, with respect to</p> <p>4 Districts 105 and 111, whether there have been</p> <p>5 any changes in the precinct boundaries since</p> <p>6 2010?</p> <p>7 A I can't say for certain.</p> <p>8 Q You don't recall any?</p> <p>9 A I'm not sure. I work with so many</p> <p>10 of them and we do this every two years, so I</p> <p>11 can't pinpoint.</p> <p>12 As far as the most recent two years,</p> <p>13 no, I don't believe that either Henry or</p> <p>14 Gwinnett have made any changes to their</p> <p>15 precincts since that's the most recent file</p> <p>16 that I worked on was the '16 file.</p> <p>17 Q Okay. I just want to make sure I</p> <p>18 understand the timing. So are you saying there</p> <p>19 have been no changes since 2016 for sure, or</p> <p>20 are you saying there have been no changes since</p> <p>21 2014?</p> <p>22 A With -- I can say with certainty</p> <p>23 that I don't believe Gwinnett or Henry have</p> <p>24 made any precinct changes since '16 -- or,</p> <p>25 actually, what's -- leading up to '16, so I</p>

46	<p>1 guess from -- since '14 leading up to the '16</p> <p>2 file, they did not have any changes.</p> <p>3 But it is possible that they made</p> <p>4 changes prior to that. The file would have</p> <p>5 been updated in '10, '12, '14, '16, et cetera,</p> <p>6 every two years.</p> <p>7 Q You brought some maps with you</p> <p>8 today.</p> <p>9 A Yes.</p> <p>10 Q Would you mind bringing the maps</p> <p>11 out?</p> <p>12 A Sure. Where would you like me to</p> <p>13 put them?</p> <p>14 Q Why don't you go ahead and let's see</p> <p>15 if we can get them to fit on the table.</p> <p>16 A They're large.</p> <p>17 Q And I very much appreciate you</p> <p>18 creating these maps or bringing these maps to</p> <p>19 the deposition.</p> <p>20 Okay. So the first map says</p> <p>21 Gwinnett County House Districts - as passed</p> <p>22 2012; is that correct?</p> <p>23 A Yes.</p> <p>24 MR. GREENBAUM: Why don't we go</p> <p>25 ahead and mark this one as Exhibit 3.</p>	48	<p>1 A Uh-huh (affirmative).</p> <p>2 (Whereupon a document was identified as</p> <p>3 Plaintiff's Exhibit 4.)</p> <p>4 Q We'll be coming back to this.</p> <p>5 I want to go ahead and for now mark</p> <p>6 each map, so I want to go next to the next map</p> <p>7 and mark as Exhibit 4 Gwinnett County House</p> <p>8 districts - as passed 2015.</p> <p>9 Do you recognize this map,</p> <p>10 Ms. Wright?</p> <p>11 A Yes.</p> <p>12 Q And could you explain what this map</p> <p>13 is?</p> <p>14 A This is a map of the State House</p> <p>15 districts as they were following the 2015 map</p> <p>16 changes of the State House districts of</p> <p>17 Gwinnett County and a little bit of the</p> <p>18 surrounding.</p> <p>19 Q Okay. And so if somebody wanted to</p> <p>20 look at the changes in District 105 between</p> <p>21 2012 and 2015, one of the things that they</p> <p>22 could do is look at the -- at Exhibit 3 and</p> <p>23 Exhibit 4 and see how they are different?</p> <p>24 A Sure.</p> <p>25 (Whereupon a document was identified as</p>
47	<p>1 (Whereupon a document was identified as</p> <p>2 Plaintiff's Exhibit 3.)</p> <p>3 (Whereupon off-the-record discussions</p> <p>4 ensued.)</p> <p>5 Q And, Ms. Wright, could you describe</p> <p>6 what Exhibit 3 is?</p> <p>7 A Exhibit 3 is a map of the State</p> <p>8 House districts as they were drawn in 2012 of</p> <p>9 Gwinnett County and all the House districts</p> <p>10 within it and some of the surrounding.</p> <p>11 Q And in the bottom right-hand corner,</p> <p>12 there, there's a set of layers that are used</p> <p>13 for the map; is that correct?</p> <p>14 A Yes.</p> <p>15 Q And those set of layers are things</p> <p>16 that are items that show up on the map itself;</p> <p>17 correct?</p> <p>18 A Correct.</p> <p>19 Q And could you list what the layers</p> <p>20 are for this particular map?</p> <p>21 A It says map layers, districts,</p> <p>22 census place, river, railroad, streets,</p> <p>23 freeway, highway, VTD 2014, county, and then it</p> <p>24 has a little mileage thing.</p> <p>25 Q Okay. Thank you.</p>	49	<p>1 Plaintiff's Exhibit 5.)</p> <p>2 Q All right. Why don't we go, go on</p> <p>3 to the next map. I want to mark as Exhibit 5 a</p> <p>4 document entitled Henry County House</p> <p>5 Districts - as of 2012.</p> <p>6 Do you recognize this document,</p> <p>7 Ms. Wright?</p> <p>8 A Yes.</p> <p>9 Q And what is this document?</p> <p>10 A This is a map of the Georgia House</p> <p>11 districts as of 2012. It's Henry County, all</p> <p>12 the districts within, and some of the</p> <p>13 surrounding.</p> <p>14 Q Okay. Thank you.</p> <p>15 A You're welcome.</p> <p>16 (Whereupon a document was identified as</p> <p>17 Plaintiff's Exhibit 6.)</p> <p>18 Q Why don't we go ahead and move on to</p> <p>19 Exhibit 6. Exhibit -- I just marked as</p> <p>20 Exhibit 6 Henry County House Districts - as</p> <p>21 passed 2015.</p> <p>22 Ms. Wright, do you recognize this</p> <p>23 document?</p> <p>24 A Yes.</p> <p>25 Q And what is this document?</p>

50	<p>1 A This is a map of the State House</p> <p>2 districts following the changes in 2015 of</p> <p>3 Henry County, the districts that are contained</p> <p>4 within, and some of the surrounding.</p> <p>5 Q Okay. And, again, if you wanted to</p> <p>6 see the changes in District 111 between 2012</p> <p>7 and 2015, one of the things that you could do</p> <p>8 is compare Exhibit 5 and Exhibit 6; is that</p> <p>9 correct?</p> <p>10 A You could do that.</p> <p>11 Q Okay. Thank you.</p> <p>12 A You're welcome.</p> <p>13 (Whereupon a document was identified</p> <p>14 as Plaintiff's Exhibit 7.)</p> <p>15 Q We can actually maybe put all the</p> <p>16 maps back on top just so that it will give you</p> <p>17 room to maneuver.</p> <p>18 Thank you. I wanted to mark as</p> <p>19 Exhibit 7 a document entitled Georgia General</p> <p>20 Assembly, Welcome to the Legislative &</p> <p>21 Congressional Reapportionment Office.</p> <p>22 Ms. Wright, do you recognize this</p> <p>23 document?</p> <p>24 A I do.</p> <p>25 Q What is it?</p>	52	<p>1 redistricting data specialist.</p> <p>2 Q Prior to Mr. O'Connor, was there a</p> <p>3 data specialist that worked in the office?</p> <p>4 A No.</p> <p>5 Q So this was, this was a role that</p> <p>6 was created during your tenure as executive</p> <p>7 director?</p> <p>8 A No, not specifically. Dan has been</p> <p>9 on the staff off and on, I guess, mostly since</p> <p>10 2005.</p> <p>11 Q Okay.</p> <p>12 A The title, we may have streamed the</p> <p>13 title a certain way, but that's -- he's always</p> <p>14 kind of done what he's done in the office,</p> <p>15 which is he knows the data very well.</p> <p>16 Q And when you talk about the data,</p> <p>17 what do you mean specifically?</p> <p>18 A Geography, political trends,</p> <p>19 election returns and results, pretty much</p> <p>20 anything, history.</p> <p>21 Q How about demographic changes?</p> <p>22 A To some degree.</p> <p>23 Q And then we mentioned Mr. Strangia</p> <p>24 before.</p> <p>25 So I take it at the, at the -- right</p>
51	<p>1 A It appears to be a printout of our</p> <p>2 web page.</p> <p>3 Q Okay. And I had asked you about</p> <p>4 previous staff before. I want to ask you some</p> <p>5 questions about the current staff. And I guess</p> <p>6 the first thing to note is that you are</p> <p>7 currently the executive director; correct?</p> <p>8 A Correct.</p> <p>9 Q And you became the executive</p> <p>10 director at some point in 2012?</p> <p>11 A Yes.</p> <p>12 Q And then it lists four other people</p> <p>13 on the staff. Could you -- and the first is</p> <p>14 Tonya Cooper. Can you describe what Ms. Cooper</p> <p>15 does?</p> <p>16 A She's our office manager.</p> <p>17 Q And then how about Mr. Knight?</p> <p>18 A He's a redistricting services</p> <p>19 specialist.</p> <p>20 Q And what does -- and that's -- that</p> <p>21 was similar to the job that you had previously?</p> <p>22 A Yes.</p> <p>23 Q How about Mr. O'Connor, Dan</p> <p>24 O'Connor?</p> <p>25 A Dan is a data specialist,</p>	53	<p>1 before there's a census, the office is probably</p> <p>2 pretty busy in preparation for the data that's</p> <p>3 going to come out for the census; correct?</p> <p>4 A It's a process that is spread out</p> <p>5 over several years leading up to the census, so</p> <p>6 it's not too crazy right, right then, but it</p> <p>7 is -- over time, we do a lot of things.</p> <p>8 Q Okay. And then after the census</p> <p>9 comes out, the office is extremely busy because</p> <p>10 it's drawing plans for the Congressional State</p> <p>11 House and State Senate; correct?</p> <p>12 A Well, initially, we're bringing the</p> <p>13 data in and putting the data to the current</p> <p>14 maps and analyzing what the data shows for the</p> <p>15 state.</p> <p>16 Q And the office also draws maps when</p> <p>17 requested for local jurisdictions?</p> <p>18 A That's correct.</p> <p>19 Q And the bulk of the redistricting</p> <p>20 is, is done in the first two years after the</p> <p>21 census comes out? Is that fair to say?</p> <p>22 A I'd say that's fair to say.</p> <p>23 Q What are the main thing that the</p> <p>24 office does? Let's say -- let's take this</p> <p>25 decade. What are the main things the office</p>

54	<p>1 does -- has done between, let's say, 2013 and 2 2017?</p> <p>3 A Okay. We are still doing a lot of 4 local redistricting in 2013. I'd say we're 5 still, still working with some of the cities 6 especially who have not redrawn their district 7 lines but some counties as well.</p> <p>8 I believe in 2013 there were a lot 9 of federal cases going on with counties whose 10 districts had not been decided upon, so I 11 worked with quite a few federal courts on that. 12 We are still maintaining work with the counties 13 on the precincts. Every -- that's constant, 14 all the time. That would have been going on in 15 2013 through those years.</p> <p>16 We've been heavily involved with 17 creation of new cities across the state, 18 creating not just their city boundary lines but 19 also working with them to have districts within 20 their cities.</p> <p>21 I don't know. I'm sure there's 22 other stuff. Of course, we're constantly doing 23 map requests, printouts and requests for not 24 just incumbent members but anyone who orders a 25 map. When they're running for any district of</p>	56	<p>1 A It's very much used when the House 2 and Senate are making appointments to different 3 boards. They have -- if they have within 4 that -- if their district is within a certain 5 congressional district, then they are, they are 6 able to vote on appointments and whatnot, 7 people like the DOT boards and things like 8 that.</p> <p>9 Q And then the next one that's listed 10 is City Districts. Could you describe what, 11 what report that is?</p> <p>12 A That is a report that lists each 13 city in Georgia, and then it lists the district 14 assignments that it would have for that 15 particular city. So it would list the House, 16 the Senate, and the congressional districts 17 that are a part of that city.</p> <p>18 Q Okay. And why is that report 19 created?</p> <p>20 A It's just a useful reference.</p> <p>21 Q And then underneath that, it says 22 Joint County Districts 2015. What is that 23 report?</p> <p>24 A That's the same kind of report as 25 the city report except it's just for the</p>
55	<p>1 any kind, they order maps from our office, so 2 we're doing requests for those things.</p> <p>3 We've done customer requests for 4 groups across the country who want files from 5 our office and maps from our office and 6 whoever. And, of course, at this point we've 7 begun work with the Census Bureau on the VDSP.</p> <p>8 Q Okay. On the second page of 9 Exhibit 7 toward the bottom, it talks about 10 Joint Reports For Current Plans. And the first 11 that's listed is the House and Senate in 12 Congressional Districts. What's the purpose 13 for -- what -- actually, strike that.</p> <p>14 What, what does that joint report 15 consist of?</p> <p>16 A That report is a report that lists 17 each of the congressional districts, and then 18 it has a column for each, the State House and 19 the State Senate, that includes a listing of 20 districts by number that are within that 21 congressional district by any -- whether it's 22 one census block or completely within that 23 congressional district.</p> <p>24 Q And why -- what's the purpose of 25 creating that report?</p>	57	<p>1 county, which districts are a part of those 2 delegations for each county.</p> <p>3 Q And you referenced before the 4 importance of county delegations in terms of 5 appointments?</p> <p>6 A Uh-huh (affirmative).</p> <p>7 Q What is the significance in terms of 8 the county delegation in terms of appointments?</p> <p>9 A Well, it's not so much the county, 10 but it's the delegation where they -- with the 11 congressional districts, it's everyone who is 12 inside of that congressional district.</p> <p>13 With the county report, any local 14 legislation or anything that the House or 15 Senate takes up, if their district is within a 16 certain county, then they are allowed to vote 17 or whatnot with that particular -- not just 18 vote, but they're -- they have to make 19 decisions on that local legislation as a group.</p> <p>20 Q Does a county delegation also 21 appoint certain people to positions?</p> <p>22 A I don't know.</p> <p>23 Q Do you have an understanding that it 24 is important for a particular party to have a 25 majority of seats that are in a particular</p>

58	<p>1 county for the delegation because there are</p> <p>2 certain things that the county delegation has</p> <p>3 authority to do?</p> <p>4 A I think I followed your question.</p> <p>5 Q I know. Sorry it's so complicated.</p> <p>6 A Are you just asking if I understand</p> <p>7 the county delegations are important?</p> <p>8 Q Yeah. Well, let me ask you this</p> <p>9 question. Do you have an understanding that</p> <p>10 the partisan makeup of a county delegation is</p> <p>11 important?</p> <p>12 A Yes.</p> <p>13 Q And why is it important?</p> <p>14 A Well, sometimes they don't agree.</p> <p>15 If all of the members of the delegation agree,</p> <p>16 then they move forward with whatever it is that</p> <p>17 they're wanting to do. If they don't agree,</p> <p>18 then they do -- you know, sometimes it's a</p> <p>19 party line vote. Sometimes it's not.</p> <p>20 Sometimes it could be regional</p> <p>21 within that county. It could be other issues</p> <p>22 that they take opinions upon. But sometimes it</p> <p>23 is a party line issue in the counties.</p> <p>24 Q Has it been the case that if a</p> <p>25 particular party's in control during a</p>	60	<p>1 A I don't know that it's ever been</p> <p>2 brought to me like that.</p> <p>3 Q How has it been brought to you?</p> <p>4 A It may come up in discussions of a</p> <p>5 county, creating districts within a county, but</p> <p>6 I don't recall ever having a member come to me</p> <p>7 and say that, that that was the thing they</p> <p>8 wanted to do.</p> <p>9 Q But it's something that's come up</p> <p>10 during the redistricting process that someone</p> <p>11 has at least mentioned the partisan split in</p> <p>12 terms of the county delegation?</p> <p>13 A Yes.</p> <p>14 Q Do you recall any particulars as to</p> <p>15 who has mentioned that?</p> <p>16 A I don't want to make a guess or just</p> <p>17 try to, you know, throw things out, so I'm not</p> <p>18 sure that I can name specific individuals that</p> <p>19 that may have come up with.</p> <p>20 (Whereupon a document was identified as</p> <p>21 Defendant's Exhibit 8.)</p> <p>22 Q Okay. All right. I want to move on</p> <p>23 to the next exhibit. I'm going to mark it as</p> <p>24 8. It's entitled, it's entitled Defendants'</p> <p>25 Initial Disclosures. Ms. Wright, have you seen</p>
59	<p>1 redistricting cycle that a priority for them is</p> <p>2 to maintain a majority in the county</p> <p>3 delegations to the greatest extent possible?</p> <p>4 A I don't know that it's a high</p> <p>5 priority, and I would not venture to say that</p> <p>6 it's a priority in every county. It's</p> <p>7 something that some of the counties consider,</p> <p>8 I'm sure, but I don't know that it's to the</p> <p>9 extreme of the number one thing they're trying</p> <p>10 to achieve.</p> <p>11 Q Has Chairman Lewis ever expressed to</p> <p>12 you the interest in, in any county maintaining</p> <p>13 a majority of Republican members in the county</p> <p>14 delegation?</p> <p>15 A I'm not sure who you're asking me</p> <p>16 about.</p> <p>17 MR. WILL: Yeah, I'm not sure who</p> <p>18 Chairman Lewis is either.</p> <p>19 Q I'm getting, I'm getting my people</p> <p>20 mixed up. Okay.</p> <p>21 Has, has any legislator ever come to</p> <p>22 you and said that they want to maintain a</p> <p>23 majority of legislators in the county</p> <p>24 delegation that is of the same party that they,</p> <p>25 they are?</p>	61	<p>1 this document before?</p> <p>2 A No.</p> <p>3 Q I'm going to ask you to go to the</p> <p>4 third page under number five. It, it says,</p> <p>5 "Provide the name of the people who are likely</p> <p>6 to have discoverable information that are used</p> <p>7 to support your claims or defenses," and here</p> <p>8 we're talking about the Defendants in this</p> <p>9 case. And then it refers to attachment A,</p> <p>10 which is, if you to go page seven, you'll see</p> <p>11 attachment A.</p> <p>12 A Okay.</p> <p>13 Q And then if you turn to page eight,</p> <p>14 you'll see your name. Were you aware that the</p> <p>15 State had identified you as a potential witness</p> <p>16 in this case?</p> <p>17 A In a document, no, but I would just</p> <p>18 figure that.</p> <p>19 Q Okay. All right. Now, if you, you</p> <p>20 go several more pages on, it's -- you got to go</p> <p>21 all the way to Exhibit 2.</p> <p>22 A Okay.</p> <p>23 Q Okay. And the first page after</p> <p>24 Exhibit 2 is 2011-2012 Guidelines for the</p> <p>25 Senate Reapportionment and Redistricting</p>

62	<p>1 Committee. And that goes on for five pages. 2 Do you recognize those guidelines? 3 A Yes. 4 Q Okay. And could you describe what 5 this document is, the Guidelines for the Senate 6 Reapportionment and Redistricting Committee? 7 A This was a document I wasn't 8 involved in putting together, but I have seen 9 it, that was done for the committee as far as 10 how they were going to go through the process 11 of redrawing the lines during the special 12 session of 2011 for use for districts for 2012. 13 Q And then I want to move on to then 14 what is Exhibit 3 in this document. And it's 15 2012 Guidelines for the House Legislative and 16 Congressional Reapportionment Committee. Do 17 you recognize that document, Ms. Wright? 18 A Yes. 19 Q And what is this document? 20 A The same document they used for the 21 House committee. 22 Q Do you, do you know if there are any 23 differences between the House document and the 24 Senate document? 25 A I do not know.</p>	64	<p>1 office in terms of working on the plan? 2 A Which plan? The House? 3 Q The 2011 House plan. 4 A As far as the House plan, I don't 5 believe there was a point person. 6 Q Okay. 7 A There were, you know, staff members, 8 several staff members, who worked in part with 9 that and on different areas, worked with 10 different members. It was a collaborative 11 effort. 12 Q To the extent that you can recall, 13 could you set forth what each person's role was 14 in the office with respect to that plan? Start 15 with you. What, what -- 16 A Well, I just told you what I did. 17 Q Was there a particular portion of 18 the state that you focused on, or how, how was 19 the work divided up within the office? What 20 was the division of labor? 21 A It wasn't, really. We worked with 22 pretty much whoever came in, whoever called. 23 Whoever wanted to work on a map, you know, they 24 scheduled an appointment. They would sit down 25 and work with us. Sometimes it was a group of</p>
63	<p>1 Q Okay. On -- we'll go back to the 2 Senate document. If you look under Roman 3 numeral III, it talks about Redistricting 4 Plans, and then it says General Principles For 5 Drafting Plans. And it then -- there are nine 6 general principles; correct? 7 A Yes. 8 Q And the, the House has nine 9 principles as well, and as far as we could 10 tell, the principles are identical. Is that 11 your understanding? 12 A I have not read them both like that, 13 so I don't know. 14 Q Okay. In drawing plans -- or, 15 actually, let me, let me go back and ask the 16 question. What was your role in terms of 17 drawing the plans -- drawing the plan that the 18 House passed in 2011? 19 A In 2011, is that what you said? 20 Q Yes. 21 A 2011, I worked with members, a lot 22 of members. I worked with our chairman. We 23 drew maps of various parts of the state, worked 24 on fitting them together to a statewide plan. 25 Q Were you the point person in your</p>	65	<p>1 members; sometimes it was a single member. We 2 worked with whoever came in. And all of us 3 kind of did whichever part happened to be, you 4 know, whoever came in. 5 Q How did you keep track, you know, 6 given that Georgia's got a lot of legislative 7 districts and a lot of counties, how did you 8 keep track of what the plan was going to be as 9 a whole? 10 A I don't know. No. 11 As we talked about the libraries, so 12 individual members had their library, and so 13 their plan would be saved in that library, 14 whatever they were working on at that time. 15 And any staff member could open that should one 16 not be available or be present when someone 17 came back in to look. 18 The chairman was ultimately involved 19 in what went into the building of what would be 20 the, the plan that we would adopt, so. 21 Q And which chair are you referring 22 to? 23 A In 2011, that would be Roger Lane. 24 Q And was there -- I'm trying to 25 figure out, you -- each member has a separate</p>

66	<p>1 folder, and there are in the House, is it 180</p> <p>2 members? Did I get that number right?</p> <p>3 A That's correct.</p> <p>4 Q So if you had 180 individual</p> <p>5 folders, let's say, how would you -- how is it</p> <p>6 done that it would all come together? What was</p> <p>7 the process of it coming together?</p> <p>8 A Well, members would work on what</p> <p>9 they wanted, whether it was an individual or a</p> <p>10 group. As I said, it could be a whole area.</p> <p>11 It could be a regional thing if it was a bunch</p> <p>12 of members who worked together on it.</p> <p>13 But they would ultimately take that</p> <p>14 to the chairman, and the chairman would decide,</p> <p>15 you know, if the members were in agreement this</p> <p>16 is what they wanted to do, this is how they</p> <p>17 wanted that area to look, then that would be</p> <p>18 pieced together in a plan that was in his</p> <p>19 folder.</p> <p>20 Q Okay. So in terms of kind of where</p> <p>21 the plan was going as a whole, you would have</p> <p>22 looked in Chairman Lane's folder?</p> <p>23 A Right.</p> <p>24 Q You mentioned before meeting with</p> <p>25 various delegations. I take it that that could</p>	68	<p>1 Q Yeah. And so are there times in</p> <p>2 which the members of a delegation that are</p> <p>3 House and Senate members from a particular</p> <p>4 county, do they sometimes come in only with</p> <p>5 people from the same party?</p> <p>6 A Can you restate that?</p> <p>7 Q Sure. In other words, are there</p> <p>8 times in which, let's say, if you're meeting</p> <p>9 with a delegation of Senators and House members</p> <p>10 from Gwinnett County that you would -- there</p> <p>11 would only be the Republican members that would</p> <p>12 come in or only the Democratic members?</p> <p>13 A I don't know that I recall meeting</p> <p>14 with a delegation the size of the Gwinnett</p> <p>15 County delegation as a whole, whether in part</p> <p>16 or as a whole, and if they come in, it would</p> <p>17 probably be a few members at a time. And I</p> <p>18 can't say for certain whether they were always</p> <p>19 of one party or if it was bipartisan.</p> <p>20 MR. GREENBAUM: Okay.</p> <p>21 MR. STRICKLAND: Is this a good time</p> <p>22 for a break?</p> <p>23 MR. GREENBAUM: Yeah, let's take a</p> <p>24 break.</p> <p>25 MR. STRICKLAND: All right.</p>
67	<p>1 include a delegation from the House, a</p> <p>2 delegation -- strike that.</p> <p>3 Could you give me examples of</p> <p>4 delegations? For example, did you ever meet</p> <p>5 with the Black Caucus, or did anybody from your</p> <p>6 office meet with the Black Caucus to your</p> <p>7 awareness, to your knowledge?</p> <p>8 A I don't recall actually meeting with</p> <p>9 the Caucus in --</p> <p>10 Q Okay.</p> <p>11 A -- in a group form. Members of the</p> <p>12 Black Caucus, yes, we did meet with, sometimes</p> <p>13 singular, sometimes several of them.</p> <p>14 Q And when you meet with people, do</p> <p>15 you meet in a place, in a room, where you can</p> <p>16 actually draw maps as you're talking to them?</p> <p>17 A Yes.</p> <p>18 Q Will you meet with county</p> <p>19 delegations sometimes?</p> <p>20 A You mean delegations of House</p> <p>21 members or Senate members?</p> <p>22 Q Yes.</p> <p>23 A Yes.</p> <p>24 Q So for example --</p> <p>25 A If they come in together.</p>	69	<p>1 THE VIDEOGRAPHER: Going off video</p> <p>2 record at 10:51 a.m.</p> <p>3 (Proceedings in recess, 10:51 a.m. to</p> <p>4 11:01 a.m.)</p> <p>5 THE VIDEOGRAPHER: We are back on</p> <p>6 video record at 11:01 a.m.</p> <p>7 Q So, Ms. Wright, before the break, we</p> <p>8 were talking about the redistricting guidelines</p> <p>9 that the Senate and the House used in the 2011</p> <p>10 redistricting cycle. To what extent did you</p> <p>11 pay attention to these what they call general</p> <p>12 principles for drafting plans when you were</p> <p>13 working on the 2011 House plan?</p> <p>14 A These are basically common</p> <p>15 principles of redistricting, so this is pretty</p> <p>16 much what I would have done.</p> <p>17 Q Okay. So you didn't -- you weren't</p> <p>18 referring to the particular document, but you</p> <p>19 were, because of your knowledge of</p> <p>20 redistricting, relying on similar principles;</p> <p>21 is that correct?</p> <p>22 A Yes.</p> <p>23 Q All right. So let's -- I'm going to</p> <p>24 ask you about several of the principles.</p> <p>25 Principle number two says, "Each</p>

70	<p>1 legislative district of the General Assembly 2 should be drawn to achieve a total population 3 that is substantially equal as practicable, 4 considering the principles listed below." 5 When you're drawing a map for the 6 General Assembly, what level of population 7 equality are you trying to achieve? 8 A We try to draw them as close to zero 9 as we can, but within the realm of some of the 10 other principles, obviously, we will allow for 11 that range to deviate from zero whether it's 12 normally within a plus or minus one percent, 13 thereabouts. It's not hard and fast, but. 14 Q And with respect to the 2011 plan, 15 do you recall what the maximum deviation was of 16 that? 17 A I don't recall specifically, no. 18 Q Okay. In the 2011 time frame, what 19 was your understanding, going to principle 20 number three, about what compliance with the 21 Voting Rights Act of 1965 entailed? 22 A Can you state that again? 23 Q Sure. Principle three says that 24 "All plans adopted by the committee will comply 25 with the Voting Rights Act of 1965, as</p>	72	<p>1 still acknowledging the fact that there were, 2 you know, districts here that may have been 3 before, may not have been before that have 4 majority-minority population in them. 5 And then in terms of Georgia, when 6 we look at that, that population specifically, 7 we are focused on the African-American 8 population because those were the districts in 9 Georgia. Prior, we had not had any majority 10 districts that were of another racial category. 11 Q In drawing the plan, was there -- to 12 what degree did the office look at issues under 13 section two of the Voting Rights Act? 14 MR. WILL: And you're still talking 15 2011? 16 MR. GREENBAUM: 2011. 17 A I don't know that, that we were 18 focused on the specific sections or anything 19 like that. We, we understood retrogression. 20 We understood all the basic principles of 21 redistricting. So we were focused on all of 22 those as a whole. And of course there were, 23 you know, legal advisors who were consulting on 24 maps as well. 25 Q And in the 2011 cycle, what legal</p>
71	<p>1 amended." 2 During the 2011 time frame, what was 3 your understanding as to what it meant to 4 comply with the Voting Rights Act? 5 A With the Voting Rights Act, you're 6 dealing with your majority-minority districts. 7 You are trying to maintain the ones that you 8 have and not -- what's the word I'm looking 9 for? 10 Q Retrogress? 11 A Right. I mean, yeah, that's the big 12 word, but, yeah. You don't want to retrogress. 13 You don't want to lose seats that are 14 already -- that are majority-minority 15 districts, if at all possible, based on the 16 population changes and growth in whatever areas 17 that you're in. 18 And in 2011 when we were working 19 with a statewide map, we are keeping in mind 20 the number of districts overall for the state 21 that we had and then, when applying the new 22 data to that, how many districts then reflected 23 a majority-minority status. 24 Even if they were not within the 25 deviation range or not anywhere close, we're</p>	73	<p>1 advisors were you working with? 2 A That would have been Anne Lewis and 3 Bryan Tyson. 4 Q And Ms. Lewis was at a law firm at 5 the time? 6 A What was that question? 7 Q Was Ms. Lewis at a law firm at the 8 time? 9 A Yes, I believe so. 10 Q And what law firm was that? 11 A That would be Strickland Brockington 12 Lewis. 13 Q And how about Mr. Tyson? 14 A He was with the same firm. 15 Q For the 2012 House redistricting, 16 did your office rely on legal advisors at all 17 for that one? 18 A I don't recall. 19 Q How about with respect to 2015 and 20 the House plan? 21 A I don't recall any outside legal 22 counsel other than legislative counsel who 23 draft the bill and work on that. 24 Q Okay. How about 2017? 25 A I don't recall our office</p>

74	<p>1 specifically working with any outside 2 attorneys, no.</p> <p>3 Q How about, how about -- maybe I 4 should be more precise. Were there attorneys 5 in the state Attorney General's Office that you 6 worked, worked with in addition to law firm 7 attorneys?</p> <p>8 A Which, at which time?</p> <p>9 Q Let's start with '11.</p> <p>10 A I don't recall working with anyone 11 from the Attorney General's Office then.</p> <p>12 Q Okay. How about '12?</p> <p>13 A Until it came time to do the 14 preclearance submission, we usually weren't 15 working closely with the AG's office.</p> <p>16 Q So going back to the issue of 17 compliance with the Voting Rights Act in the 18 2011 time frame, would it be fair to say that 19 what you were primarily focused on was 20 maintaining at least the same number of 21 majority-minority districts?</p> <p>22 A Can you say that one more time?</p> <p>23 Q Sure. I'm trying to sort of 24 summarize with respect to compliance with the 25 Voting Rights Act what you were trying -- what</p>	76	<p>1 tried to focus on that.</p> <p>2 The Georgia Constitution addresses 3 contiguities. Of course, we were focusing on 4 that, making sure that all the districts were 5 contiguous. And outside of the broad realm of 6 redistricting, we would rely upon attorneys for 7 their expertise on those areas.</p> <p>8 Q With respect to you mentioned 9 contiguity a second ago. What is your 10 understanding of what contiguity is?</p> <p>11 A Contiguity being all parts of the 12 district touch each other and at more than a 13 single point.</p> <p>14 Q How do you, when you're drawing a 15 map, determine whether there's contiguity?</p> <p>16 A Maptitude has a particular test you 17 can run that will tell you if there is any 18 noncontiguous pieces. However, Georgia has a 19 few counties that have noncontiguous -- or 20 they're not -- they're point contiguity. 21 They're not noncontiguous, but they're at a 22 point.</p> <p>23 And we do allow for that to be used 24 for those county lines if it becomes an issue. 25 If that particular county is split in such a</p>
75	<p>1 your office was trying to accomplish or what 2 you felt like you needed to do or what the -- 3 to comply.</p> <p>4 A In relation to the Voting Rights 5 Act?</p> <p>6 Q Yes.</p> <p>7 A That was, that was, yes, probably 8 the most important objective, yes, was to not 9 regress.</p> <p>10 Q That the key objective was to at 11 least maintain the same number of 12 majority-minority districts?</p> <p>13 A Right, related to the Voting Rights 14 Act.</p> <p>15 Q Correct. Okay. Moving on to number 16 four, complying with the United States and 17 Georgia Constitutions, what, what were you -- 18 what in particular were you looking at trying 19 to do to make sure that you complied with the 20 United States and Georgia Constitutions?</p> <p>21 A Well, the United States 22 Constitution, you know, of course, speaks to 23 the congressional districting in specific, but 24 as far as keeping them -- the equal population, 25 one-person/one-vote, those types of things, we</p>	77	<p>1 way or grouped with another district but it's 2 not an issue, then it's not an issue. But if 3 it comes up, we prioritize holding that county 4 line and keeping it whole.</p> <p>5 Q Okay. I want to move on to number 6 seven now. It talks about three concepts the 7 committee should consider. One is the 8 boundaries of counties and precincts. In 9 drawing the plans, to what extent are you 10 accounting for the boundaries of counties and 11 precincts?</p> <p>12 A I don't have a gauge to measure 13 exactly how much I'm putting a weight on that. 14 Anyone who's ever worked on a map with me knows 15 that I value county and precinct lines greatly 16 because I know how difficult it is and what a 17 challenge it is for these local counties to 18 work through what it causes them when the 19 precincts are all divided up for their 20 elections and the ballot combos and things that 21 they have to do. It makes it a whole lot more 22 difficult for them.</p> <p>23 So in any case, if I can keep a 24 precinct whole or put a whole -- put a precinct 25 back together, I'm going to do that because I</p>

78	<p>1 know that that's beneficial to all the local</p> <p>2 governments.</p> <p>3 Q Under what circumstances will you</p> <p>4 split counties?</p> <p>5 A Normally, counties are split because</p> <p>6 of population. If they are larger than</p> <p>7 whatever the district size is that we're</p> <p>8 drawing, then, obviously, you have to have more</p> <p>9 than one district that makes up that county.</p> <p>10 Sometimes it goes into the history</p> <p>11 of a county. Maybe it's always had two members</p> <p>12 that have represented it or more. There's a</p> <p>13 lot of reasons that can go into play, but I</p> <p>14 would say population is the number one.</p> <p>15 Q So population, history of the</p> <p>16 county. Can you think of any others?</p> <p>17 A Of why we would split a county?</p> <p>18 Q Yes.</p> <p>19 A Off the top of my head, I don't</p> <p>20 know.</p> <p>21 Q Okay. And when you're using</p> <p>22 Maptitude, will it let you know as you're</p> <p>23 working on a plan how many counties are being</p> <p>24 split by that plan?</p> <p>25 A You can run certain reports that</p>	80	<p>1 that make up that precinct, and because we</p> <p>2 can't have noncontiguous districts, we split</p> <p>3 the precinct then to account for the way that</p> <p>4 the precinct is drawn.</p> <p>5 I'm sure there may be more.</p> <p>6 Q Well, I'd like -- so the three that</p> <p>7 you mentioned so far, let me make sure I have</p> <p>8 this correct first, is you'd split to balance</p> <p>9 population? You'd split having to do with the</p> <p>10 residence of an incumbent?</p> <p>11 A Could happen.</p> <p>12 Q And the third that you mentioned was</p> <p>13 geographical. And examples you gave was</p> <p>14 division by an interstate or where, where there</p> <p>15 are noncontiguous boundaries. Can you think of</p> <p>16 any other instances in which you'd split a</p> <p>17 precinct?</p> <p>18 A I mean, I suppose, if you were</p> <p>19 trying to keep a particular city or community</p> <p>20 together, you might would do that then. If</p> <p>21 that precinct was sufficiently large and had</p> <p>22 different regions or sections in it that were</p> <p>23 different communities, you might do that for</p> <p>24 that.</p> <p>25 Q Any others?</p>
79	<p>1 would tell you that.</p> <p>2 Q And how about splitting precincts?</p> <p>3 Under what circumstances -- you mentioned</p> <p>4 before that you try to the extent possible to</p> <p>5 keep precincts intact. Under what</p> <p>6 circumstances would you split precincts?</p> <p>7 A Again, if you're trying to balance</p> <p>8 population and you can't do it within the</p> <p>9 realms of keeping precincts whole, which is</p> <p>10 always what I try to do first, sometimes it</p> <p>11 happens that you have to divide a precinct.</p> <p>12 Sometimes the precinct may be</p> <p>13 divided because an incumbent lived in a</p> <p>14 precinct and had a reason for wanting it split.</p> <p>15 That could happen. Normally, they want their</p> <p>16 whole precinct though, so if we can do that, we</p> <p>17 do.</p> <p>18 Sometimes it may be geographical.</p> <p>19 If there's a good reason there to divide that</p> <p>20 precinct to make it more -- to make more sense</p> <p>21 for the balance of the district, maybe it's a</p> <p>22 major interstate that divides it, maybe the</p> <p>23 precinct -- in some cases the precincts have</p> <p>24 noncontiguous geography, and they follow city</p> <p>25 limit lines or they have islands and pieces</p>	81	<p>1 A I don't know. I'm sure there may be</p> <p>2 others, but that's what's coming to me right</p> <p>3 now.</p> <p>4 Q Okay. And when you're in Maptitude,</p> <p>5 will it let you know when precincts are being</p> <p>6 split?</p> <p>7 A Maptitude as it is will run a report</p> <p>8 based on the VTDs, so that report would be</p> <p>9 accurate with the VTD layer. However, if there</p> <p>10 have been changes to precinct boundaries in a</p> <p>11 county -- which we do have changes that went</p> <p>12 in.</p> <p>13 In 2010, prior to the redistricting</p> <p>14 cycle, we had a new precinct layer already. So</p> <p>15 you kind of have to keep that in mind as well</p> <p>16 that those won't show up in the report</p> <p>17 necessarily, but you can kind of get a ballpark</p> <p>18 idea from using that.</p> <p>19 The further you get away from the</p> <p>20 VTD layer and the census data, you know, from</p> <p>21 2010, the more counties have made precinct</p> <p>22 changes and the more that report becomes a</p> <p>23 little bit less useful.</p> <p>24 Q And then 7b references compactness.</p> <p>25 What is your understanding of compactness?</p>

82	<p>1 A Compactness being how closely</p> <p>2 related to a center point or the size of the</p> <p>3 district, the shape of the district.</p> <p>4 Q How do you go about, when you're</p> <p>5 working on a plan, ensuring compactness?</p> <p>6 A There -- I know that there are</p> <p>7 things, tests that you can run, for</p> <p>8 compactness. I have not used those</p> <p>9 traditionally. Compactness, I guess, in my</p> <p>10 opinion can sometimes be in the eye of the</p> <p>11 beholder. So if I'm the beholder, I look at</p> <p>12 it.</p> <p>13 Q Is compactness something that you</p> <p>14 prioritize when you're drawing plans?</p> <p>15 A It depends on what the other</p> <p>16 criteria are for a particular area or district.</p> <p>17 Yes, I mean, it's important, but I think there</p> <p>18 are other factors that would probably take a</p> <p>19 higher precedence if I was ranking them.</p> <p>20 Q Okay. Well, along those lines,</p> <p>21 could you tell me what your ranking is of</p> <p>22 factors?</p> <p>23 A I don't really have one, but I know</p> <p>24 complying with the law is obviously at the top</p> <p>25 of that list, so you would want to make sure</p>	84	<p>1 list in there that you can pull down a menu to</p> <p>2 use them, but I don't use that.</p> <p>3 Q And do you have an opinion on using</p> <p>4 any of these measures one way or the other?</p> <p>5 A No. I don't use them.</p> <p>6 Q Are you in a position to evaluate</p> <p>7 whether any of those measures are legitimate or</p> <p>8 illegitimate?</p> <p>9 A I don't use them, so I'm not in that</p> <p>10 position.</p> <p>11 Q And then moving on to number nine --</p> <p>12 I mean, I'm sorry, 7c, communities of interest,</p> <p>13 are communities of interest something that you</p> <p>14 consider when you're drawing a plan?</p> <p>15 A Communities of interest is a hard</p> <p>16 principle to define. Our state's really large,</p> <p>17 obviously. I don't know every community of</p> <p>18 interest across the state and where they are</p> <p>19 and how they would define themselves.</p> <p>20 As a community of interest can be</p> <p>21 people who shop at a certain area or people who</p> <p>22 attend a certain church or people who travel</p> <p>23 certain areas. That's very difficult. There's</p> <p>24 not a cut and dry way to define it.</p> <p>25 So those types of measures would be</p>
83	<p>1 you're complying with the law. That's the</p> <p>2 number one thing.</p> <p>3 And then outside of that, it's not</p> <p>4 really that there's a hierarchy or anything. I</p> <p>5 work with all of the principles together. In</p> <p>6 any given case, one may be more, more easily</p> <p>7 done than another.</p> <p>8 Q So you mentioned before that you</p> <p>9 don't use quantitative measures of compactness;</p> <p>10 correct?</p> <p>11 A That's correct.</p> <p>12 Q Do you know if Maptitude has certain</p> <p>13 measures of compactness within the program?</p> <p>14 A I believe it does.</p> <p>15 Q Do you know what any of them are</p> <p>16 called?</p> <p>17 A Yes, maybe.</p> <p>18 Q Okay. Have you heard of Reock</p> <p>19 before?</p> <p>20 A Yes.</p> <p>21 Q And is that something that Maptitude</p> <p>22 uses?</p> <p>23 A I believe so.</p> <p>24 Q Okay.</p> <p>25 A I think there is -- think there's a</p>	85	<p>1 something that is a little bit more from the</p> <p>2 members and from the local delegations and from</p> <p>3 the local people that they can define that and</p> <p>4 say to us, this area is, you know, they all</p> <p>5 have kids at this school or they, whatever, you</p> <p>6 know. They know that area, that feature, more</p> <p>7 than we would.</p> <p>8 So if it's brought to our attention</p> <p>9 for a reason from an individual member or from</p> <p>10 someone from the community that is involved in</p> <p>11 doing the work on this, then, yes, we would</p> <p>12 look at that.</p> <p>13 Q But it's not something that you go</p> <p>14 out and try to determine yourself? You sort of</p> <p>15 rely on, to the extent that a member or</p> <p>16 somebody else identifies something as a</p> <p>17 community of interest --</p> <p>18 A Right.</p> <p>19 Q -- that you'll use that?</p> <p>20 A Right, if possible.</p> <p>21 Q And in Maptitude, is there any way</p> <p>22 to measure communities of interest?</p> <p>23 A Not that I'm aware of.</p> <p>24 Q Now, we were talking a little</p> <p>25 earlier about demographic change in Gwinnett</p>

86	<p>1 County; correct?</p> <p>2 A Yes.</p> <p>3 Q And you mentioned the difference</p> <p>4 between the 2000 and the 2000 [sic] census</p> <p>5 data in Gwinnett County with respect to</p> <p>6 demographics; correct?</p> <p>7 A 2000/2010, yes.</p> <p>8 Q And is it fair to say that, first</p> <p>9 of all, that total population in Gwinnett</p> <p>10 County grew tremendously between 2000 and</p> <p>11 2010?</p> <p>12 A Yes, it grew a lot.</p> <p>13 Q Do you use American FactFinder by</p> <p>14 the way in terms of looking at census data?</p> <p>15 A Do I, or have I?</p> <p>16 Q Have you?</p> <p>17 A I have.</p> <p>18 Q Did you with respect to</p> <p>19 redistrictings for any of the state</p> <p>20 legislative plans?</p> <p>21 A Not that I recall.</p> <p>22 Q Okay. But in any event, you knew</p> <p>23 that, because of the growth of population in</p> <p>24 Gwinnett County, it would likely have more</p> <p>25 districts in the 2011 plan than it had</p>	88	<p>1 about these documents in particular, but have</p> <p>2 you seen similar printouts from the census in</p> <p>3 terms of laying out population information for</p> <p>4 counties under the census data?</p> <p>5 A I've looked at it online before.</p> <p>6 Q Okay. I want to call your attention</p> <p>7 to the second page of this document.</p> <p>8 Well, let's start with the overall</p> <p>9 population. So you see that in 2000 the</p> <p>10 population is 588,488; correct?</p> <p>11 A Correct.</p> <p>12 Q And in 2010 the population jumps up</p> <p>13 to 805,321; correct?</p> <p>14 A Correct.</p> <p>15 Q And what I want to do is compare the</p> <p>16 white non-Hispanic numbers, so in 2000, if you</p> <p>17 go to the second page and under Hispanic or</p> <p>18 Latino and race, it breaks it up between --</p> <p>19 there's a portion that talks about the Hispanic</p> <p>20 population, and then it says non-Hispanic or</p> <p>21 Latino population.</p> <p>22 A Uh-huh (affirmative).</p> <p>23 Q And then under that, it has the</p> <p>24 white non-Hispanic and Latino population, and</p> <p>25 you see that that number is 394,164?</p>
87	<p>1 previously?</p> <p>2 A Yes.</p> <p>3 Q Okay. Would it also be the case</p> <p>4 that the, that the growth in population in</p> <p>5 Gwinnett County was driven by the growth of</p> <p>6 minority population --</p> <p>7 A Do you --</p> <p>8 Q -- between 2000 and 2010?</p> <p>9 A I don't know the specific amounts of</p> <p>10 growth and what categories they fell in. I</p> <p>11 know they had a lot of growth, but I don't know</p> <p>12 the details.</p> <p>13 MR. WILL: 10 and 11?</p> <p>14 THE WITNESS: 2010 --</p> <p>15 MR. WILL: No, exhibit numbers. 10</p> <p>16 and 11?</p> <p>17 THE WITNESS: 9 and 10.</p> <p>18 (Whereupon documents were identified</p> <p>19 as Plaintiff's Exhibit 9 and Plaintiff's</p> <p>20 Exhibit 10.)</p> <p>21 Q All right. I'm marking as Exhibit 9</p> <p>22 the Census 2000 Summary File 1 profile of</p> <p>23 Gwinnett County and Exhibit 10 is the 2010</p> <p>24 census profile of Gwinnett County.</p> <p>25 Ms. Wright, are you -- not talking</p>	89	<p>1 A Yes.</p> <p>2 Q Okay. And then if you look at 2010</p> <p>3 and you go to the third page toward the bottom,</p> <p>4 it has Hispanic or Latino and race, and there's</p> <p>5 a whole section on non-Hispanic or Latino, and</p> <p>6 the white population you see is 354,316;</p> <p>7 correct?</p> <p>8 A Yes.</p> <p>9 Q And so the county population</p> <p>10 increased by over 200,000 people between 2000</p> <p>11 and 2010; correct?</p> <p>12 A Yes.</p> <p>13 Q And the white non-Hispanic</p> <p>14 population decreased from roughly 394,000 to</p> <p>15 354,000; correct?</p> <p>16 A Yes.</p> <p>17 Q And so the growth in population in</p> <p>18 Gwinnett County between 2000 and 2010 was</p> <p>19 driven by the Latino population, by the -- by</p> <p>20 the nonwhite population; correct?</p> <p>21 A According to what you're showing</p> <p>22 here, that looks to be very much of an impact.</p> <p>23 It made a very big impact, yes.</p> <p>24 Q Now, were you aware of that at all</p> <p>25 when you were working on the House plans in</p>

90	<p>1 2011?</p> <p>2 A Yes. We knew there was a growth in</p> <p>3 Hispanic population. We drew a majority</p> <p>4 Hispanic district in the house.</p> <p>5 Q Did you also know that there was a</p> <p>6 large growth in the black population?</p> <p>7 A I don't know that I knew the numbers</p> <p>8 of it, but as we mentioned before, yes, we knew</p> <p>9 there was changing demographics and growth in</p> <p>10 different areas, so.</p> <p>11 Q So, I mean, we'll just look at this</p> <p>12 really briefly. If you go to 2000 at the top</p> <p>13 of the second page -- actually, it's at the</p> <p>14 bottom of the first page, it has race, and it</p> <p>15 has black or African-American, and it's 78,224</p> <p>16 for -- bottom of the first page for 2000.</p> <p>17 A Okay. I see that.</p> <p>18 Q And if you go to -- and for 2000,</p> <p>19 they didn't have black non-Hispanic, so that</p> <p>20 would include people who black and Hispanic and</p> <p>21 black and non-Hispanic.</p> <p>22 For 2010, they did, they did break</p> <p>23 that down, and you see that at the bottom of</p> <p>24 the third page next to the white population</p> <p>25 that the black or African-American non-Hispanic</p>	92	<p>1 have always used for analysis has always been</p> <p>2 that the Hispanic is an ethnicity, so it can be</p> <p>3 used in combination, you know, with other</p> <p>4 races.</p> <p>5 So keeping that in mind when we were</p> <p>6 looking at it, we have not in the past dug down</p> <p>7 to the level of the non-Hispanic this, that,</p> <p>8 and the other and all these categories. It's</p> <p>9 not been something that we ever -- we never</p> <p>10 used the data that way.</p> <p>11 Q Now, in Georgia, people who are --</p> <p>12 when people fill out their registration forms,</p> <p>13 it asks them to list a race or ethnicity or</p> <p>14 indicate a race or ethnicity; correct?</p> <p>15 A When they register to vote, you</p> <p>16 mean?</p> <p>17 Q Yes.</p> <p>18 A I believe it's a combined question.</p> <p>19 It's one or the other. It's altogether. It's</p> <p>20 what is your race/ethnicity, and there are</p> <p>21 options.</p> <p>22 Q And Hispanic is treated as a</p> <p>23 different option than anything else, correct, a</p> <p>24 separate and distinct option?</p> <p>25 A No, not that I -- to my knowledge,</p>
91	<p>1 population is 184,122?</p> <p>2 A Yes, I see that.</p> <p>3 Q So fair to say that the black</p> <p>4 population went from 78,000 to 184,000?</p> <p>5 A Yes.</p> <p>6 Q And on a percentage basis, the black</p> <p>7 population went from 13 percent to 22.9</p> <p>8 percent; correct?</p> <p>9 A Looks to be correct.</p> <p>10 Q Now, you mentioned before the</p> <p>11 increase in the Hispanic population in Gwinnett</p> <p>12 County between 2000 and 2010; correct?</p> <p>13 A Actually, you did, but yes.</p> <p>14 Q But you, acknowledged that --</p> <p>15 A Yes.</p> <p>16 Q -- correct?</p> <p>17 A Uh-oh. Something just came</p> <p>18 unplugged, I think. Maybe not.</p> <p>19 MR. WILL: You're good.</p> <p>20 A We're good. Okay. Sorry.</p> <p>21 Q And in drawing the districts in</p> <p>22 2011, did your office take into account that</p> <p>23 increase in Hispanic population in Gwinnett?</p> <p>24 A As much as we were aware of what is</p> <p>25 shown with the data, yes, Hispanic data that we</p>	93	<p>1 Hispanic is included in that one question, so</p> <p>2 they either pick those -- one of those options.</p> <p>3 Q Right. And Hispanic would be a</p> <p>4 different option than, let's say, white or</p> <p>5 black --</p> <p>6 A Right.</p> <p>7 Q -- correct?</p> <p>8 A Right.</p> <p>9 Q Sorry if I didn't make that clear</p> <p>10 enough the first time.</p> <p>11 Now, with respect to the 2011 plan,</p> <p>12 did you work on the districts in Gwinnett or</p> <p>13 Henry County at all to your recollection?</p> <p>14 A I did work on Henry County. I'm not</p> <p>15 real clear about how much work I did on</p> <p>16 Gwinnett in the 2011 cycle.</p> <p>17 Q Okay.</p> <p>18 A Don't remember.</p> <p>19 Q All right. So let's, let's, let's</p> <p>20 move on to Henry County. And by the way, in</p> <p>21 Gwinnett and Henry County for the State House</p> <p>22 districts, there was no difference between the</p> <p>23 2011 House plan and the 2012 House plan;</p> <p>24 correct?</p> <p>25 A No, that's not correct.</p>

94	<p>1 Q Oh, there was.</p> <p>2 A In Gwinnett, the northern part of</p> <p>3 Gwinnett was changed some in the '12 plan.</p> <p>4 Q Okay.</p> <p>5 A As a result of the changes that were</p> <p>6 made in the Gainesville area, they trickled</p> <p>7 down into the northern part of Gwinnett.</p> <p>8 Q All right. But it didn't affect 104</p> <p>9 or 105?</p> <p>10 A It did affect 104.</p> <p>11 Q Okay. It didn't affect 105;</p> <p>12 correct?</p> <p>13 A It did not affect 105.</p> <p>14 Q All right. And with respect to</p> <p>15 Henry County, were those districts the same in</p> <p>16 2011 and 2012?</p> <p>17 A Yes, they were.</p> <p>18 Q Okay. So let's talk about Henry</p> <p>19 County, which you said you worked on with</p> <p>20 respect to the 2011 redistricting.</p> <p>21 A Yes.</p> <p>22 Q Were you aware that the overall</p> <p>23 population in Henry County increased</p> <p>24 dramatically between 2000 and 2010?</p> <p>25 A Yes.</p>	96	<p>1 of the number of people in the district?</p> <p>2 A For the average district size?</p> <p>3 Q Yes.</p> <p>4 A It was about 50, 50-something</p> <p>5 thousand. 54,000 maybe rounded.</p> <p>6 Q For 2000 or 2010?</p> <p>7 A '10.</p> <p>8 Q Okay. 2010. And do you recall what</p> <p>9 it was for 2000?</p> <p>10 A 40-something thousand, I think. I'd</p> <p>11 have to go back and look.</p> <p>12 Q So let's say it's 40-something</p> <p>13 thousand. So in Henry County, if you kept --</p> <p>14 let's say, you try to keep county boundaries</p> <p>15 intact as much as possible. In 2000, it would</p> <p>16 have a little bit less than three districts'</p> <p>17 worth of population?</p> <p>18 A Say that again.</p> <p>19 Q Sure. Let's say that, let's say</p> <p>20 that your overriding goal was to keep</p> <p>21 counties -- to keep districts contained within</p> <p>22 one county when you were redistricting. Would</p> <p>23 it be fair to say that for 2000 Henry County</p> <p>24 had a little bit less than three full districts</p> <p>25 of population? Because if each district had</p>
95	<p>1 (Whereupon documents were identified as</p> <p>2 Plaintiff's Exhibit 11 and Plaintiff's</p> <p>3 Exhibit 12.)</p> <p>4 Q Okay. We'll look at, we'll look at</p> <p>5 some of the numbers.</p> <p>6 Oh, I'm sorry.</p> <p>7 All right. I'm going to mark as</p> <p>8 Exhibit 11 the 2000 census profile in Henry</p> <p>9 County and as 12 the 2010 census profile for</p> <p>10 Henry County.</p> <p>11 A This is 2000. There's several --</p> <p>12 there's more of these here.</p> <p>13 MR. WILL: 2000 is 11, and 2010 is</p> <p>14 12?</p> <p>15 MR. GREENBAUM: Correct.</p> <p>16 Q Ms. Wright, you see that the</p> <p>17 population in Henry County increased</p> <p>18 dramatically between 2000 and 2010; correct?</p> <p>19 A Yes.</p> <p>20 Q And it went from 119,341 in 2000 to</p> <p>21 203,922 in 2010; correct?</p> <p>22 A That's what this shows, yes.</p> <p>23 Q What was, in terms of total</p> <p>24 population for the, for the, for the 2000</p> <p>25 census plans, what was the approximate amount</p>	97	<p>1 40,000 people, the county as a whole has</p> <p>2 119,000.</p> <p>3 A I think it was closer to 45 to</p> <p>4 50,000.</p> <p>5 Q Okay.</p> <p>6 A It wasn't -- it was on the middle to</p> <p>7 the upper end, but if you could just strap it</p> <p>8 within the county and limit it to the</p> <p>9 boundaries, then it would divide to about</p> <p>10 three, but that's not ever really possible.</p> <p>11 Q A little bit, a little bit less than</p> <p>12 three; right?</p> <p>13 A Right.</p> <p>14 Q And then for 2010, if the average</p> <p>15 district is about 54,000 and the total</p> <p>16 population is 203,000, it's somewhere</p> <p>17 between -- it's close to four full districts'</p> <p>18 worth of population; correct?</p> <p>19 A If you, if you're dividing it by</p> <p>20 that, yes.</p> <p>21 Q Okay. In Henry County, how many</p> <p>22 full districts or portions of districts are in</p> <p>23 the county?</p> <p>24 A On the House map?</p> <p>25 Q On the House map.</p>

98	<p>1 A In the 2011/2012 version?</p> <p>2 Q Let's take them both. For 2012, how</p> <p>3 many are there?</p> <p>4 A I believe there's eight.</p> <p>5 Q And three of those eight are</p> <p>6 majority-minority districts; is that correct?</p> <p>7 A Yes, I think so.</p> <p>8 Q And do you know the race of the</p> <p>9 people that represent those districts?</p> <p>10 A Of the three districts?</p> <p>11 Q Uh-huh (affirmative.)</p> <p>12 A I think all three are</p> <p>13 African-American.</p> <p>14 Q And do you know what party those</p> <p>15 three representatives are from?</p> <p>16 A They are from the Democratic party.</p> <p>17 Q Okay. And then the other five</p> <p>18 districts, what are the race of the people who</p> <p>19 represent those districts?</p> <p>20 A They are white.</p> <p>21 Q Okay. And then what party are they</p> <p>22 from?</p> <p>23 A Republican.</p> <p>24 Q I want to -- it will help me, it may</p> <p>25 not help you, but I'd like to take a look at</p>	100
99	<p>1 the Henry County maps while we're talking</p> <p>2 about -- keep these documents out.</p> <p>3 A You want the most recent?</p> <p>4 Q Let's start with '12, and then we'll</p> <p>5 go to '15. So in '12, what are the three</p> <p>6 districts that are majority-minority?</p> <p>7 A It would be 76, 78, and 90.</p> <p>8 Q And 76, what other county is 76 in?</p> <p>9 A Clayton.</p> <p>10 Q And is Clayton majority black</p> <p>11 county?</p> <p>12 A Yes.</p> <p>13 Q And how about 78?</p> <p>14 A What county --</p> <p>15 Q What county in addition to Henry</p> <p>16 County?</p> <p>17 A Oh, it's also in Clayton.</p> <p>18 Q And then District 90, is that --</p> <p>19 what, what other county is District 90 in, if</p> <p>20 any?</p> <p>21 A It has part of Rockdale and part of</p> <p>22 DeKalb.</p> <p>23 Q And then of the, of the eight</p> <p>24 districts that are in Henry County in 2012, how</p> <p>25 many of them were only in Henry County?</p>	101

102	<p>1 Q And so it more than quadrupled</p> <p>2 during those ten years?</p> <p>3 A Yes.</p> <p>4 Q And that the percentage went from</p> <p>5 14.7 percent to 36.3 percent; is that correct.</p> <p>6 A Yes.</p> <p>7 Q Okay. And so there's a lot more</p> <p>8 black population in Henry County in 2010 than</p> <p>9 2000. Do you know essentially where all these</p> <p>10 people came from?</p> <p>11 A They didn't tell me.</p> <p>12 Q Okay. Do you know why the black</p> <p>13 population increased by that, by that amount?</p> <p>14 A They moved into the county.</p> <p>15 Q Do you know if -- have you studied</p> <p>16 the demographic trends to see whether people</p> <p>17 are moving from places like Clayton County and</p> <p>18 other adjoining counties into Henry County?</p> <p>19 A I have not studied that, no.</p> <p>20 Q Okay. Did you, did you pay</p> <p>21 attention when you were working on Henry County</p> <p>22 in 2011 as to where the concentrations of black</p> <p>23 population are in the county?</p> <p>24 A I would, I would say that I knew</p> <p>25 more or less where they were, yes.</p>	104	<p>1 Q Yes.</p> <p>2 A I recall meeting with Steve Davis.</p> <p>3 I believe I met with Andy Welch. At some</p> <p>4 point, everyone on the delegation met with me,</p> <p>5 which would include representatives from those</p> <p>6 districts from Clayton County and also from the</p> <p>7 90th. I met with all of them at some point,</p> <p>8 but some of those members are not the same</p> <p>9 members that we have now.</p> <p>10 Q Did you, did you have an</p> <p>11 understanding at the time as to -- when you</p> <p>12 drew the plan in 2011 in Henry County, did you</p> <p>13 have, in addition to census data, voter</p> <p>14 registration data that you looked at?</p> <p>15 A I don't recall looking at voter</p> <p>16 registration data. We probably had it in our</p> <p>17 file, but I don't remember looking at it.</p> <p>18 Q You mentioned before that -- strike</p> <p>19 that.</p> <p>20 So with respect to Maptitude, do you</p> <p>21 have in Maptitude the ability, when you're</p> <p>22 drawing around in a plan, the ability to look</p> <p>23 at what the racial data is?</p> <p>24 A In what capacity?</p> <p>25 Q Let's, let's say you're -- let's say</p>
103	<p>1 Q Okay. And what was your</p> <p>2 understanding of where the, where the black</p> <p>3 population was predominantly concentrated?</p> <p>4 A There are some heavier areas that</p> <p>5 are concentrated in the northern parts of the</p> <p>6 county and then along that side of the county</p> <p>7 that borders Clayton County.</p> <p>8 Q Okay. So the closer people were to</p> <p>9 the northern part of the county to Clayton</p> <p>10 County, those were the areas that had the</p> <p>11 larger black populations; correct?</p> <p>12 A I would -- yes. And I would say</p> <p>13 they also have had larger growth in general, of</p> <p>14 all kinds of growth.</p> <p>15 Q Okay. And when you were -- so you</p> <p>16 had, you had the VTDs and the precincts in 2010</p> <p>17 when you were working on the portion of the</p> <p>18 county in Henry County, a portion of the plan</p> <p>19 that was in Henry County; correct?</p> <p>20 A Yes.</p> <p>21 Q What, what legislators did you work</p> <p>22 with respect, with respect to Henry County for</p> <p>23 the 2011 plan?</p> <p>24 A In the House, is that what you're</p> <p>25 asking?</p>	105	<p>1 you're working on a plan in Henry County and</p> <p>2 you're drawing out districts, and I suspect</p> <p>3 that each of the districts as you're drawing it</p> <p>4 will have certain metrics that will go with</p> <p>5 that district. It will have total population,</p> <p>6 for example; right?</p> <p>7 A Uh-huh (affirmative).</p> <p>8 Q You have to -- you have to --</p> <p>9 A Right.</p> <p>10 Q Will it also have racial data with</p> <p>11 respect to that district?</p> <p>12 A When I work on a plan, I use the</p> <p>13 pending changes box, which is a feature in</p> <p>14 Maptitude that shows you how your numbers</p> <p>15 change as you select what geography you're</p> <p>16 selecting.</p> <p>17 Q Okay.</p> <p>18 A And you can set and move which</p> <p>19 fields you want to have in that change box as</p> <p>20 you go. So for me I usually keep a</p> <p>21 combination. I like to have the political data</p> <p>22 there as well as other data, racial data,</p> <p>23 population data, all of those other things.</p> <p>24 Q Now, the political -- so, so the,</p> <p>25 the race data you will have at the block level;</p>

106	<p>1 correct?</p> <p>2 A Yes.</p> <p>3 Q In terms of the political data, what</p> <p>4 will be the level of geography that you'll have</p> <p>5 that at?</p> <p>6 A I have it at the block level also.</p> <p>7 It's an estimate. When we bring in our file</p> <p>8 from the Secretary of State's office, it is</p> <p>9 completely accurate to the precinct, but when</p> <p>10 we allo -- we allocate that data from them to</p> <p>11 the block level, it estimates that figure to</p> <p>12 the blocks based on the percentage and</p> <p>13 proportions of the population.</p> <p>14 So it would take the voter</p> <p>15 registration numbers and allocate that to</p> <p>16 correspond to however many -- if you have, for</p> <p>17 example, if you have a block where, or several</p> <p>18 blocks, in a precinct where you have a lot of</p> <p>19 population right here in these blocks and then</p> <p>20 nobody, you have zeros out here, it's going to</p> <p>21 obviously allocate that proportion there of the</p> <p>22 voter data, not here because nobody lives here.</p> <p>23 So it spreads it out through the blocks.</p> <p>24 Q And when you're talking about</p> <p>25 political data, what political data do you</p>	108	<p>1 So, right, it's the only statewide</p> <p>2 races, so if it was a governor's race or a US</p> <p>3 Senate race or whatever, those are the kinds of</p> <p>4 things that will be on there.</p> <p>5 Q Will you also have the voter</p> <p>6 registration data on that level in terms of --</p> <p>7 will you have the voter registration data?</p> <p>8 A Yes.</p> <p>9 Q Will you have the voter registration</p> <p>10 data broken out by race?</p> <p>11 A I don't know that it breaks down all</p> <p>12 of the race categories. I don't, I don't think</p> <p>13 that it does, not to the extent of what these</p> <p>14 categories are. It may break down -- I don't</p> <p>15 remember if it breaks down all of the ones that</p> <p>16 are in the selection field.</p> <p>17 Q How about black?</p> <p>18 A Yes.</p> <p>19 Q Now, I want to ask you a little bit</p> <p>20 more about the estimation component, so let's</p> <p>21 say that you have a precinct that has a</p> <p>22 thousand voters in the precinct, and let's say</p> <p>23 that the Democratic candidate receives 50</p> <p>24 percent of the vote in the precinct and the</p> <p>25 Republican candidate receives 50 percent of the</p>
107	<p>1 have? What political data do you get?</p> <p>2 A I think we kind of hit on it</p> <p>3 earlier, but it's the -- we have the</p> <p>4 registration numbers from those fields, and</p> <p>5 then we have contested races, statewide</p> <p>6 contested races, that we pull in from that</p> <p>7 cycle before.</p> <p>8 So when we drew in '11, that would</p> <p>9 have had the 2010 precinct layer that we build</p> <p>10 with the precinct changes in that as well as</p> <p>11 that data from the 2010 election cycle.</p> <p>12 Q So, so you'll have things like</p> <p>13 statewide races in there that are contested?</p> <p>14 A Yes.</p> <p>15 Q And then will you also have local</p> <p>16 races in there --</p> <p>17 A No.</p> <p>18 Q -- that are contested? So it's</p> <p>19 only, it's only the statewide races that you'll</p> <p>20 have?</p> <p>21 A It's a statewide layer that's built.</p> <p>22 We build it for the, the entire state, all the</p> <p>23 precincts in the state. So, yes, we have to</p> <p>24 have something that is universal that we can</p> <p>25 apply across the entire plan.</p>	109	<p>1 vote in the precinct, and you're splitting the</p> <p>2 precinct between two different districts.</p> <p>3 Will it assume that every block is a</p> <p>4 50-50 vote, or how will it count for the fact</p> <p>5 that it's unlikely that you're going to have</p> <p>6 that sort of split in a particular county?</p> <p>7 A It is my understanding, and I'm not</p> <p>8 the person who handles doing this aspect of</p> <p>9 creating the layer, but it is my understanding</p> <p>10 that there is -- the formulas that are built</p> <p>11 within to the way that it allocates that data</p> <p>12 that it's going to use the voter registration</p> <p>13 number in conjunction with the VAP numbers.</p> <p>14 So if you have a portion of the</p> <p>15 block that has a higher percentage of -- say,</p> <p>16 that particular 50-50 block, say, there's a</p> <p>17 portion there -- or it's not a block. It's a</p> <p>18 precinct, I guess.</p> <p>19 There's a block that has, you know,</p> <p>20 completely white VAP. Well, it's not going to</p> <p>21 allocate black registered voter numbers to a</p> <p>22 block that's got no black people in it, if that</p> <p>23 makes sense.</p> <p>24 Q Yeah.</p> <p>25 A So there's some way in the</p>

110	<p>1 formula -- and I don't, I don't know the ins 2 and outs. That's not what I do. But that it 3 allocates the VAP. It can -- it uses the VAP 4 in conjunction with the voter registration 5 number to work on -- to work out how it 6 allocates.</p> <p>7 Q So in terms of the, in terms of the 8 political -- I'm interested in terms of the 9 political calculation.</p> <p>10 Let's say that you have the block 11 that has 50 white people, it has zero black 12 people, and the overall precinct is a 50-50 13 split between Democrats and Republicans. For 14 that block that has 50 white voters and zero 15 black voters, will it assume, in terms of the 16 political layer, that it's a 50-50 result?</p> <p>17 A I would think it would, yes, because 18 I don't think it -- it doesn't have a way to 19 know. Obviously, we don't know how those 20 voters voted, so it's going to divide it up 21 using that formula if the computer -- it's what 22 computers do. So it's going to divide it the 23 way that it sees with the data that's there.</p> <p>24 Q So every, so every precinct that's 25 within again -- or strike that.</p>	112	<p>1 completely connected to what those precinct 2 boundaries were and how they voted for the 3 previous election cycle.</p> <p>4 Q Okay. So you, so you won't, you 5 won't be able to tell within a precinct as to 6 which portions of the precinct primarily went 7 Democrat and which portions of the precinct 8 primarily went Republican compared to the 9 average?</p> <p>10 A Say that one more time?</p> <p>11 Q Yeah. It's just, it's just back 12 to --</p> <p>13 A I'm starting to feel like this. 14 Yeah.</p> <p>15 Q It's sort of the same question, 16 that if you have, let's -- you know, if you 17 have 200 blocks in a precinct --</p> <p>18 A Okay.</p> <p>19 Q -- and the -- and it's -- and the 20 precinct as a whole splits 50-50, it's 21 unlikely that in every census block the actual 22 vote is 50-50.</p> <p>23 A Correct.</p> <p>24 Q But it's being assumed for the 25 purposes of doing the political calculation</p>
111	<p>1 Every block within, going back to my 2 50-50 example, every block within the precinct 3 that splits Democratic voter -- Democratic 4 candidate 50 percent, Republican candidate 50 5 percent, every block in there for the political 6 calculation is going to assume that it's a 7 50-50 split?</p> <p>8 A I would assume so.</p> <p>9 Q You don't know?</p> <p>10 A I don't know for certain.</p> <p>11 Q Okay.</p> <p>12 A I'd have to go -- I don't know that 13 I've ever seen one like that, so I would have 14 to go look.</p> <p>15 Q Who --</p> <p>16 A So I don't know.</p> <p>17 Q Who would be the person in your 18 office that would know the answer to that?</p> <p>19 A That would Rob Strangia.</p> <p>20 Q Okay.</p> <p>21 A As we always say with the blocks, 22 it's an estimate. I mean, the political data 23 at the block level is an estimate. It's a 24 pretty decent estimate, but it's an estimate. 25 At the precinct level though, it is, it is</p>	113	<p>1 that it's breaking down 50-50.</p> <p>2 A In an unusual case such as that, 3 yes, I would think it would calculate it that 4 way.</p> <p>5 Again, when I discuss communities of 6 interest, this is another area where an 7 incumbent member and people from the county, 8 they know where the voters lie, where the 9 voters live, or people vote here or they people 10 don't vote here.</p> <p>11 So if we needed a consultation for 12 them to say this portion of a precinct has no 13 voters in it or it's not developed yet or it's, 14 you know, whatever, they would know that at the 15 local level more than we would. But like I 16 said, the estimate is a pretty good estimate. 17 (Whereupon a document was identified 18 as Plaintiff's Exhibit 13.)</p> <p>19 Q All right. Why don't we go on to -- 20 earlier, you referenced a section five 21 submission. And I'm going to next show you -- 22 actually, strike that. I'm going to go -- I'm 23 going to cover something else really quickly.</p> <p>24 All right. I'm going to mark as 25 Exhibit 13 a document where the first page is a</p>

114	<p>1 letter from Jimmy McDonald to the Honorable 2 Roger Lane, and it's dated February 15th, 2011. 3 I only have two copies of this one. 4 Ms. Wright, you mentioned earlier 5 that Jimmy McDonald was the executive director 6 of the Legislative & Congressional 7 Reapportionment Office in 2011; correct? 8 A Yes. 9 Q And was Mr. Lane the chair of the 10 redistricting committee? 11 A He was. I'm not sure when he 12 received a chair appointment, but yes. 13 Q But it was sometime in -- for the 14 2011 redistricting, he was the chair; correct? 15 A Yes, that's correct. 16 Q All right. And the first sentence 17 of this letter says, as you -- "As I'm sure you 18 have heard, the Legislative & Congressional 19 Reapportionment Office was recently created as 20 a joint legislative services office to provide 21 redistricting services to the General 22 Assembly." 23 Is that your recollection is that 24 around 2011 the Legislative & Congressional 25 Reapportionment Office was created?</p>	116	<p>1 time, 2 Q Do you know whether or not those two 3 things were connected to one another? 4 A In what way? 5 Q That as part of doing the 6 modification that there was a decision to bring 7 in a new executive director and that executive 8 director was Mr. McDonald? 9 A I wasn't privy to any of those 10 decisions. 11 Q Okay. All right. I want to move on 12 to the next page, which says Proposed Project 13 Procedures for the Legislative & Congressional 14 Reapportionment Office. And I think that goes 15 on for three pages. Do you recognize that 16 document? 17 A No. 18 Q Do you recall being told that 19 legislators can schedule a two-hour appointment 20 to discuss a plan with a member of the staff? 21 A No. May have happened, but I don't 22 recall it. 23 Q Okay. 24 A If you're asking if I recall it, I 25 don't recall it.</p>
115	<p>1 A I would disagree with that. 2 Q As a joint legislative services 3 office to provide redistricting services to the 4 General Assembly? 5 A What we were modified to be is a 6 joint legislative services office. They 7 decided not to renew the contract with the 8 University of Georgia and brought us completely 9 under the wing of the General Assembly. 10 Q So the General Assembly decided not 11 to renew the contract? 12 A Right. They opted to -- it was a 13 cost saving and other things to have us to be a 14 staff office there. We were there already, but 15 to pay our salaries and whatnot through that 16 route rather than have to go through the, the 17 cycle of the contract. 18 Q Now, the last sentence of the first 19 paragraph says, "I am humbled to have been 20 hired as the executive director of that 21 office." Is it your recollection that this 22 modification that you just referenced was done 23 sort of in conjunction with Mr. McDonald 24 becoming the executive director? 25 A I believe it was all around the same</p>	117	<p>1 Q You don't recall the document? You 2 don't recall these specific procedures? 3 A No, I don't. 4 Q Okay. I'm going to ask you about 5 one procedure in particular. It's on the third 6 page, it's under Roman numeral IV, number one, 7 and it talks about hard copies of maps. 8 Do you recall this procedure of 9 "Legislator-drawn maps shall require the 10 signature of the legislature -- legislator"? 11 A Can I have a minute to read this? 12 Q Absolutely. 13 A Can you repeat the question? 14 Q Sure. Do you recall this procedure 15 related to legislator-drawn maps requiring the 16 signature of the legislator prior to the 17 legislator being able to pick up the map? 18 A I do not recall them having to sign 19 for it, but having read this, I believe this is 20 in relation to the local redistricting -- 21 Q Okay. 22 A -- as opposed to statewide work 23 because sometimes you would have legislators 24 drawing local maps, but sometimes the 25 legislator would authorize a local delegation</p>

118	<p>1 to do that work, so I think that's what that is</p> <p>2 in conjunction with.</p> <p>3 Q Okay. Okay. All right. And then I</p> <p>4 want to go to, to the staff page, if you go a</p> <p>5 couple, a couple more. And then there's a -- I</p> <p>6 think the only new name on here is Kade</p> <p>7 Cullefer?</p> <p>8 A Uh-huh, yes.</p> <p>9 Q Kade is a man or a woman?</p> <p>10 A A man.</p> <p>11 Q A man. So Mr. Cullefer, what was he</p> <p>12 doing as a redistricting specialist that was</p> <p>13 different than what you were doing at the time?</p> <p>14 A In 2011 through that cycle, I was</p> <p>15 primarily working on the statewide maps. Most</p> <p>16 of the other staff members who worked on</p> <p>17 redistricting were involved in local</p> <p>18 redistricting or a combination thereof, local</p> <p>19 as well as some of the legislative work.</p> <p>20 Q So in terms of the people that were,</p> <p>21 were working on the plans themselves within the</p> <p>22 office, and I'm talking about the state plans,</p> <p>23 was Mr. McDonald working on them?</p> <p>24 A How do you define working?</p> <p>25 Q Well, what did Mr. McDonald do in</p>	120	<p>1 A No.</p> <p>2 Q And I think we mentioned that</p> <p>3 Ms. Cooper and Mr. Strangia, they weren't</p> <p>4 really -- they aren't really plan drawers in</p> <p>5 terms of what they do?</p> <p>6 A That's correct.</p> <p>7 Q So the primary plan drawers within</p> <p>8 the office with respect to the statewide plan</p> <p>9 were you and Mr. Cullefer; is that correct?</p> <p>10 A That is correct. This list was</p> <p>11 prior to Mr. Knight being hired. That would</p> <p>12 have been still in 2011, but it was -- and it</p> <p>13 was still before we were deep, you know, into</p> <p>14 the process. So he, he worked a lot on local,</p> <p>15 but he also assisted some with some of the</p> <p>16 House work.</p> <p>17 Q So you -- but you and Mr. Cullefer</p> <p>18 would have done more on the House plan than</p> <p>19 Mr. Knight?</p> <p>20 A As I said before, I think the House</p> <p>21 plan was a group effort. Mr. Knight worked on</p> <p>22 it some. Mr. O'Connor was not yet, I guess,</p> <p>23 established and back into our office at that</p> <p>24 point, and he worked on that some as well.</p> <p>25 Q Where was Mr. O'Connor working at</p>
119	<p>1 relationship to the State House map plan?</p> <p>2 A I really don't know.</p> <p>3 Q Okay. So I take it from your answer</p> <p>4 he didn't -- he did not have much involvement,</p> <p>5 to your knowledge?</p> <p>6 A I don't -- in terms of the technical</p> <p>7 end of it, that would be correct.</p> <p>8 Q What end of it would -- did he have</p> <p>9 more of a role?</p> <p>10 A Um -- I know I'm not supposed to say</p> <p>11 um.</p> <p>12 He did a lot of talking. I mean, he</p> <p>13 conversed with a lot of people. He was doing</p> <p>14 more of the discussion end of it, I think,</p> <p>15 meeting with people and having conversations</p> <p>16 and those sorts of things.</p> <p>17 Q Was he taking information from those</p> <p>18 conversations back to you and the other people</p> <p>19 that were actually working on the plan?</p> <p>20 A Yes.</p> <p>21 Q All right. And it says that with</p> <p>22 respect to Ms. El that she was focusing on</p> <p>23 local redistricting. Did she have any</p> <p>24 involvement in the State House plan</p> <p>25 development?</p>	121	<p>1 the time?</p> <p>2 A He was an employee of the General</p> <p>3 Assembly. He was with -- he was the committee,</p> <p>4 what, analyst or redistricting committee</p> <p>5 analyst or research person. I don't know what</p> <p>6 the title of that is, but.</p> <p>7 Q Okay. And was he primarily working</p> <p>8 for one party or the other? You know like, for</p> <p>9 example, in Congress, staffers are usually,</p> <p>10 even if they don't have an official title,</p> <p>11 they're usually working for a particular member</p> <p>12 or a particular party.</p> <p>13 A That's not the case with the Georgia</p> <p>14 General Assembly, no. He worked for everybody.</p> <p>15 Q Okay. I want to go to the page that</p> <p>16 is the next page of -- it's an email dated</p> <p>17 February 21st, 2011.</p> <p>18 A 23rd?</p> <p>19 Q February 23rd, 2011.</p> <p>20 A Okay. I thought you said 21st.</p> <p>21 Q My mistake.</p> <p>22 Is it the case that one of the</p> <p>23 things your office was asking for was the, the</p> <p>24 residence address of each member?</p> <p>25 A Yes.</p>

122	<p>1 Q And why is that?</p> <p>2 A So we know where they live. Because</p> <p>3 if incumbency is an issue that they want to</p> <p>4 address, then we have to know where the</p> <p>5 incumbents' addresses are in order so we don't</p> <p>6 pair incumbents together and whatnot.</p> <p>7 Q And then if you look a couple pages</p> <p>8 on, there's an email on June 20th to, it looks</p> <p>9 like, from Mr. McDonald to all of the, all of</p> <p>10 the members. Was it the way that it worked</p> <p>11 that members, if they wanted to talk to the</p> <p>12 staff about the redistricting plan, that they</p> <p>13 needed to make an appointment through</p> <p>14 Ms. Cooper?</p> <p>15 A I believe that was the case, yes.</p> <p>16 Q The email, there's a person that</p> <p>17 cc'd whose name is Spiro Amburn.</p> <p>18 A Spiro.</p> <p>19 Q Spiro Amburn.</p> <p>20 A Uh-huh (affirmative).</p> <p>21 Q My mistake. And Mr. Amburn, what</p> <p>22 was his role at the time?</p> <p>23 A He is the chief of staff to the</p> <p>24 speaker of the house.</p> <p>25 Q He was and is?</p>	124	<p>1 Q Do you provide -- did you write any</p> <p>2 of it? Did you provide information for it?</p> <p>3 That's what I mean.</p> <p>4 A I did not write any of it. We did</p> <p>5 provide maps, reports, and whatnot.</p> <p>6 Q Did you review it before it went in?</p> <p>7 A No.</p> <p>8 Q And we're going to be, we're going</p> <p>9 to be going through some of the exhibits. Have</p> <p>10 you seen this submission prior to today?</p> <p>11 A I don't recall.</p> <p>12 Q Okay.</p> <p>13 MR. WILL: Just as a matter of</p> <p>14 edification for the lawyer who's not a member</p> <p>15 of the parties, what -- how does this relate to</p> <p>16 the claims in the suit, and how does it relate</p> <p>17 to what she was designated to testify to as a</p> <p>18 30(b)(6) witness?</p> <p>19 MR. GREENBAUM: It relates in that a</p> <p>20 lot of the data that the office relies upon I</p> <p>21 think is data that -- as I talked about in</p> <p>22 terms of the exhibits, I'm not going to ask so</p> <p>23 much about the content of the data in the</p> <p>24 submission, but the content and what the</p> <p>25 office -- some of the exhibits and what the</p>
123	<p>1 A He is, yes.</p> <p>2 Q Do you recall whether he was in</p> <p>3 2011?</p> <p>4 A I believe he was, yes.</p> <p>5 Q Okay. And then the last page has a</p> <p>6 redistricting timeline on it. Have you seen</p> <p>7 that timeline before?</p> <p>8 A I probably have. I don't recall it.</p> <p>9 Q Was this basic schedule sort of</p> <p>10 consistent with the timeline you were working</p> <p>11 on?</p> <p>12 A Seems to be accurate.</p> <p>13 (Whereupon a document was identified as</p> <p>14 Plaintiff's Exhibit 14.)</p> <p>15 Q Okay. Thank you. All right. Now I</p> <p>16 want to move on to the redistricting</p> <p>17 submission.</p> <p>18 All right. I'm going to mark as</p> <p>19 Exhibit 14 a document entitled Submission Under</p> <p>20 Section 5 of the Voting Rights Act - Request</p> <p>21 For Expedited Review.</p> <p>22 Ms. Wright, did your office play a</p> <p>23 role in the Section 5 submission to the</p> <p>24 Department of Justice in October 2011?</p> <p>25 A How would you define "play a role"?</p>	125	<p>1 office relies --</p> <p>2 MR. WILL: I'm trying to give you</p> <p>3 every benefit of the doubt, but --</p> <p>4 MR. GREENBAUM: I understand.</p> <p>5 MR. WILL: -- also when you have</p> <p>6 30(b)(6) witnesses, you like them to be</p> <p>7 generally prepared to respond to what they're</p> <p>8 asked to respond to, and I'm not sure that 2011</p> <p>9 fell within those categories.</p> <p>10 MR. GREENBAUM: Sure. You know --</p> <p>11 MR. WILL: So I don't want to -- I</p> <p>12 don't want to say -- have a witness saying I</p> <p>13 don't know, I don't know, I haven't seen them,</p> <p>14 not familiar with it because we weren't asked</p> <p>15 to prepare for that, so.</p> <p>16 MR. GREENBAUM: Fair enough.</p> <p>17 MR. WILL: Okay?</p> <p>18 MR. GREENBAUM: You know, part of my</p> <p>19 intent too was to avoid having the witness come</p> <p>20 back in her own capacity and get it all done at</p> <p>21 once.</p> <p>22 MR. WILL: I think we've all in</p> <p>23 agreement on that.</p> <p>24 MR. GREENBAUM: Great.</p> <p>25 MR. WILL: Thank you, Mr. Greenbaum.</p>

126	<p>1 MR. GREENBAUM: Appreciate it, 2 Mr. Strickland. All right. 3 MR. WILL: He's Strickland. I'm 4 Mr. Will. 5 MR. GREENBAUM: Mr. Will. 6 MR. WILL: That's okay. People get 7 us confused all the time. 8 MR. STRICKLAND: That's all right. 9 MR. GREENBAUM: I will, I will -- 10 MR. WILL: Old guys with glasses. 11 We get confused a lot. 12 MR. GREENBAUM: I will get to know 13 you better during the course of this case. My 14 apologies, Mr. Will. 15 Q All right. So I'm just going to ask 16 you a few questions about this document. 17 On page nine -- and if you use the 18 numbers in the right-hand corner, it's 1370. 19 Up in terms of number one in the equal 20 apportionment, is it your recollection that the 21 deviations of the House and Senate plans were 22 plus or minus one percent from the ideal 23 district size? 24 A I believe they were, yes. 25 Q Now, toward the bottom of that same</p>	128	<p>1 a few members of the Democratic Caucus that 2 they were going to vote for the map prior to 3 that email being sent out. 4 Q Okay. I'm going to move on to page 5 19. 6 A What number is that? 7 Q 1380. 8 A I don't think I have that far. It 9 stops at 74. 10 MR. WILL: There you go. Try mine. 11 THE WITNESS: That one has the 12 sticker on it. 13 MR. GREENBAUM: Yeah. We'll have to 14 switch it out. The next break we'll -- or if 15 you can do it. 16 (Whereupon off-the-record discussions 17 ensued.) 18 Q So just to make sure you've got a 19 full copy, is 1385 the last page? 20 A No. It goes into 87, 40-something. 21 Oh, it's clipped to this maybe. 22 Q Oh, that's the problem. All right. 23 A And what was the one you said? 24 3084? 25 Q The last page, 1385.</p>
127	<p>1 page, right before no retrogressive effect, it 2 says, "In the Senate, the Democratic Caucus 3 took a similar position of lockstep 4 opposition." 5 And the sentence before talked about 6 the Democrats being -- voting against the 7 plans. Is that consistent with your 8 recollection? 9 A Can you say that one more time? 10 Q Yeah. Do you recall the Democrats 11 voting -- all voting against the House plan, 12 both the House members and the Senate members 13 voting against the House plan? 14 A Yes. 15 Q Do you recall what their 16 articulation was as to why? 17 A Why they voted against it? 18 Q Yeah. 19 A They didn't really tell me why they 20 voted against a map, but there was widespread 21 knowledge of an email that was sent out to the 22 minority caucus threatening them primary 23 opposition if they didn't vote against it. 24 I know, from my personal working 25 with a lot of them, I had been told from quite</p>	129	<p>1 A Oh. 2 MR. WILL: Yes. 3 THE WITNESS: Is that the back copy? 4 Yes. 5 MR. WILL: Yes. 6 Q Okay. Great. All right. So page 7 19, Exhibit J-5 talks about "district level 8 voter registration and credit for voting 9 information, by race, for the November general 10 elections held in 2006, 2008, 2010." 11 Do you know what that's in reference 12 to? 13 A No. 14 THE VIDEOGRAPHER: Mr. Greenbaum 15 could you please bring your mic up a little 16 bit? Every time you go forward, it hits the 17 table. 18 MR. GREENBAUM: All right. 19 MR. WILL: Those football officials 20 that have those coaches where they have one guy 21 right behind him to make sure they stay off the 22 field? We're going to have somebody run with 23 you to move your mic. 24 MR. GREENBAUM: Well, David, what 25 can I do? All right.</p>

130	<p>1 All right. Number 20.</p> <p>2 (Whereupon a document was identified as</p> <p>3 Plaintiff's Exhibit 15.)</p> <p>4 Q Okay. All right. Ms. Wright, I'm</p> <p>5 marking as Exhibit 20 a document that in the</p> <p>6 upper right-hand corner --</p> <p>7 A It says 15.</p> <p>8 THE COURT REPORTER: Exhibit 15.</p> <p>9 Q That's right. I have a different</p> <p>10 numbering system here. Exhibit 15 is a</p> <p>11 document that's numbered 1392 in the upper</p> <p>12 right-hand corner. It says</p> <p>13 Exhibit A - Benchmark House Plan. Do you</p> <p>14 recognize this document, Ms. Wright?</p> <p>15 A Yes.</p> <p>16 Q What is the document?</p> <p>17 A This is a standard stat sheet that</p> <p>18 we produce in our office. This would be the</p> <p>19 Benchmark House Plan, which would have been the</p> <p>20 House districts as they were in 2010 with the</p> <p>21 new census data applied to those district</p> <p>22 boundaries.</p> <p>23 Q Okay. I'm going to ask you about</p> <p>24 some of the -- and this is -- is this a kind of</p> <p>25 standard report that your office creates with a</p>	132	<p>1 sometimes to know the voting age population is,</p> <p>2 you know, eligible pool of voters, so it's,</p> <p>3 it's useful knowledge. People like to know how</p> <p>4 many people are in that district are 18 and up</p> <p>5 and eligible to vote.</p> <p>6 Q Okay. And then it has a Deviation,</p> <p>7 Deviation Percent, and what's the significance</p> <p>8 of having that in there?</p> <p>9 A Deviation is the whole number</p> <p>10 figure, number of people away from what the</p> <p>11 ideal district size is. If it's no sign, it's</p> <p>12 above the ideal. If it's a minus number, it's</p> <p>13 below the ideal. And the percent is just the</p> <p>14 percentage of that.</p> <p>15 Q Okay. And then why do you have</p> <p>16 Black and Percentage Black total population and</p> <p>17 voting population stats for each district?</p> <p>18 A Because we have districts in Georgia</p> <p>19 that are minority, majority-minority districts,</p> <p>20 and so that gives us the ability to know which</p> <p>21 districts those are.</p> <p>22 Q Okay. And then what's Black Combo?</p> <p>23 A Black Combo would be anyone who</p> <p>24 filled out their census form and said that they</p> <p>25 were black in combination with another race.</p>
131	<p>1 new redistricting plan?</p> <p>2 A Yes. This is the standard stat</p> <p>3 sheet we create for most all of our</p> <p>4 redistricting plans.</p> <p>5 Q And is this something that you do</p> <p>6 through Maptitude or you do it through another</p> <p>7 means?</p> <p>8 A It is done in Maptitude. It is a</p> <p>9 custom report that we had built through</p> <p>10 Maptitude to use.</p> <p>11 Q Okay. And I want to ask you about</p> <p>12 the various categories.</p> <p>13 A Okay.</p> <p>14 Q At least some of them. Now, one of</p> <p>15 the things that the report appears to do is it</p> <p>16 has a -- I think for each district the first</p> <p>17 row is total population. The second row is</p> <p>18 voting age population. Is that correct?</p> <p>19 A Yes.</p> <p>20 Q And what's the significance of</p> <p>21 having both total population and voting age</p> <p>22 population in there?</p> <p>23 A We redistrict using total population</p> <p>24 that all of it is included when you draw</p> <p>25 districts for the size of the districts, but</p>	133	<p>1 Q And then you have a Total Black, so</p> <p>2 is that the Black plus Black Combo?</p> <p>3 A It is. It would be equivalent to</p> <p>4 the AP Black.</p> <p>5 Q And then you have Percent Total</p> <p>6 Black in addition to Percent Black; correct?</p> <p>7 A Yes.</p> <p>8 Q And when you're coming up with a</p> <p>9 plan, do you pay more attention to the Percent</p> <p>10 Black or to the Percent Total Black?</p> <p>11 A So we pay attention to both, but</p> <p>12 typically, we pay more attention to the Percent</p> <p>13 Total Black.</p> <p>14 Q And why is that?</p> <p>15 A Because that would include anyone</p> <p>16 who said that they were in any -- black in any</p> <p>17 way, shape, or form, that they were or they</p> <p>18 identified themselves as either all or part</p> <p>19 black.</p> <p>20 Q Okay. And then with respect to</p> <p>21 Hispanic or Latino, why is that -- and Percent</p> <p>22 Hispanic, why are those columns included here?</p> <p>23 A They are included because they are</p> <p>24 the, like I said, they are divided off because</p> <p>25 of a different question, they being an</p>

134	<p>1 ethnicity and not the race category. But as</p> <p>2 through the years Georgia has had an increasing</p> <p>3 Hispanic population in certain areas, so that</p> <p>4 would let us be able to see where that is.</p> <p>5 Q In looking at -- did you consider at</p> <p>6 all adding together or considering Percent</p> <p>7 Black plus Percent Hispanic?</p> <p>8 A No.</p> <p>9 Q Why not?</p> <p>10 A Well, as I've already explained,</p> <p>11 Hispanic -- the Hispanic question is an</p> <p>12 ethnicity, and so the people who are of that</p> <p>13 category could also be any other race as well</p> <p>14 as also identifying themselves as Hispanic. So</p> <p>15 in all of my years working in this office,</p> <p>16 we've never added the two together because it</p> <p>17 would be like adding apples and oranges. They</p> <p>18 are a race question versus an ethnicity</p> <p>19 question.</p> <p>20 Q Is your, is your Percent Black and</p> <p>21 Percent Total Black, is that all black, or is</p> <p>22 it black non-Hispanic?</p> <p>23 A I would have to double-check. As</p> <p>24 far as I'm aware, it would be all, and not the,</p> <p>25 and not Hispanic.</p>	136	<p>1 would be able to generate the report? I'm</p> <p>2 talking about as of 2011.</p> <p>3 A As of when in 2011? I mean, prior</p> <p>4 to the redrawing or at the beginning or that</p> <p>5 staff list you had earlier?</p> <p>6 Q Let's, let's say at -- well, this</p> <p>7 was part of the redistricting submission, so</p> <p>8 October 21st, 2011.</p> <p>9 A So it would be myself. It could be</p> <p>10 Shantée El, Brian Knight, Dan O'Connor, Kade</p> <p>11 Cullefer.</p> <p>12 This looks like a custom report,</p> <p>13 something that was probably either requested</p> <p>14 or that someone wanted to have. This isn't</p> <p>15 something that's a standard report. So it</p> <p>16 would just be something that we put together</p> <p>17 for someone probably. I would guess. That's</p> <p>18 spec -- I'm just guessing. I don't know.</p> <p>19 Q Have you ever seen a report like</p> <p>20 this that has -- it looks like, on the</p> <p>21 right-hand side, it looks like it has, in</p> <p>22 addition to total population and voting age</p> <p>23 population, numbers for African-Americans,</p> <p>24 also of black reg 10 and a black reg 10</p> <p>25 percent.</p>
135	<p>1 (Whereupon a document was identified as</p> <p>2 Plaintiff's Exhibit 16.)</p> <p>3 Q Okay. All right. I'm going to mark</p> <p>4 as Exhibit 16 a document that's numbered 1411</p> <p>5 in the upper right-hand corner. Ms. Wright, do</p> <p>6 you recognize this document?</p> <p>7 A I do not.</p> <p>8 Q Okay. Now, have you seen a report</p> <p>9 like this before?</p> <p>10 A No, not really. I mean --</p> <p>11 Q Now, at the bottom of the page, it</p> <p>12 says that it's a Report Prepared by the</p> <p>13 Legislative & Congressional Reapportionment</p> <p>14 Office; correct?</p> <p>15 A Yes.</p> <p>16 Q Now, at the top, it says the Plan is</p> <p>17 House 06 and the Type is House and the User is</p> <p>18 Staff. Is that -- what does that mean in the</p> <p>19 context of your office when it says staff as</p> <p>20 the user?</p> <p>21 A It just means one of us did it.</p> <p>22 Q Okay. And I know you're not</p> <p>23 familiar with this particular document or this</p> <p>24 particular report, but who would be the person</p> <p>25 in your office that would be -- or people that</p>	137	<p>1 A Uh-huh (affirmative). I'm sorry.</p> <p>2 What?</p> <p>3 Q Have you seen a report like that</p> <p>4 before that your office has created that blends</p> <p>5 together total population and voting population</p> <p>6 with black registration numbers for each</p> <p>7 district?</p> <p>8 A I don't see every custom report that</p> <p>9 gets created, but this would be, you know, not</p> <p>10 unlikely or unusual to see if someone requested</p> <p>11 that information.</p> <p>12 Q Okay. So I want to go back really</p> <p>13 quickly to the submission document, which is</p> <p>14 Exhibit 14. And if you go to page 1376 in</p> <p>15 there and you look at A-6, and it references a</p> <p>16 "summary statistical report showing black</p> <p>17 population figures and voter registration for</p> <p>18 the current plan, sorted by district."</p> <p>19 Would you agree with me that</p> <p>20 Exhibit 16 seems to be what they're referencing</p> <p>21 here as Exhibit Number A-6?</p> <p>22 A That seems likely.</p> <p>23 MR. GREENBAUM: All right. Why</p> <p>24 don't we take a break because the tape needs to</p> <p>25 be changed.</p>

138	<p>1 THE VIDEOGRAPHER: Going off the</p> <p>2 video record at 12:26 p.m.</p> <p>3 (Proceedings in recess, 12:26 p.m. to</p> <p>4 1:14 p.m.)</p> <p>5 THE VIDEOGRAPHER: We are now back</p> <p>6 on video record at 1:14 p.m. This is the</p> <p>7 beginning of file number three.</p> <p>8 (Whereupon a document was identified</p> <p>9 as Plaintiff's Exhibit 17.)</p> <p>10 Q All right. Ms. Wright, I'm going</p> <p>11 to mark as the next Exhibit 17 a document</p> <p>12 entitled Political Subdivisions Split Between</p> <p>13 Districts for the House 2006 Plan.</p> <p>14 Ms. Wright, do you recognize this</p> <p>15 form of report?</p> <p>16 A Yes.</p> <p>17 Q Is this something that is created</p> <p>18 by Maptitude?</p> <p>19 A Yes.</p> <p>20 Q And is this something that's</p> <p>21 typically done when you are creating a</p> <p>22 statewide plan?</p> <p>23 A Not always, but occasionally.</p> <p>24 Q Okay. And what's the significance</p> <p>25 of showing how many sub -- how many</p>	140	<p>1 MR. WILL: Thank you, Joel.</p> <p>2 THE COURT REPORTER: You're welcome.</p> <p>3 Q Ms. Wright, do you recognize this</p> <p>4 document?</p> <p>5 A It's the same type of report run on</p> <p>6 a different plan.</p> <p>7 Q For the 2011 House Plan?</p> <p>8 A Yes.</p> <p>9 Q Okay. And when you're in the</p> <p>10 process of creating a plan, do you also sort of</p> <p>11 look at how many counties and voting districts</p> <p>12 are being split?</p> <p>13 A Not necessarily in the process.</p> <p>14 Maybe at the end of when you've finished</p> <p>15 working on a plan you might would run that,</p> <p>16 kind of an end-of-the-process sort of review.</p> <p>17 It's not really something you do in the middle.</p> <p>18 Q And what are you looking for when</p> <p>19 you do it at the end?</p> <p>20 A Just the totals, total number that</p> <p>21 you, that you would have split counties.</p> <p>22 Sometimes you want to look at these subdivision</p> <p>23 splits affecting no population to see if those</p> <p>24 are done in a way that you could fix those,</p> <p>25 that you could put those back together, make</p>
139	<p>1 subdivisions are split and not split?</p> <p>2 A This is showing the number of</p> <p>3 counties that are split and then beneath that</p> <p>4 the number of voting districts that are split</p> <p>5 as well. And then below that it shows the ones</p> <p>6 that are split that do not affect any</p> <p>7 populations, so just to know those statistics.</p> <p>8 Q So for the voting district split, do</p> <p>9 you know if this was using the 2000 VTDs or the</p> <p>10 2010 VTDs?</p> <p>11 A If this is the, this is the 2006</p> <p>12 version, I would assume that we ran this using</p> <p>13 the 2010 geography, which would mean those were</p> <p>14 the VTDs as of 2010, but I can't say that for</p> <p>15 certain. It could be that they wanted to know</p> <p>16 what it was when it was drawn. So we would</p> <p>17 have used it on an older version, but I don't</p> <p>18 have a way to know because Maptitude doesn't</p> <p>19 designate it that way.</p> <p>20 (Whereupon a document was identified</p> <p>21 as Plaintiff's Exhibit 18.)</p> <p>22 Q Okay. All right. I want to mark as</p> <p>23 Exhibit 18 a document entitled Exhibit B - 2011</p> <p>24 House Plan, Political Subdivision Split Between</p> <p>25 Districts.</p>	141	<p>1 that precinct whole for one reason or another.</p> <p>2 You can -- sometimes you could catch a mistake</p> <p>3 that way if there was a technical mistake.</p> <p>4 Q And according to this, the 2000</p> <p>5 House Plan had 191 split voting districts, and</p> <p>6 25 of those affected no population; correct?</p> <p>7 A That's what this says, yes.</p> <p>8 Q And if I wanted to know, prior to</p> <p>9 the 2015 House Plan, how many precincts were</p> <p>10 split in Districts 105 and 111, could I look at</p> <p>11 this report and find that out?</p> <p>12 A If you wanted to know how many were</p> <p>13 split in 105 and 111?</p> <p>14 Q Yes.</p> <p>15 A When it was drawn in 2011, you could</p> <p>16 use this, yes.</p> <p>17 Q Would I be able to use -- were those</p> <p>18 precincts split up prior to 2015? Do you know?</p> <p>19 Strike that.</p> <p>20 Do you know if there were other</p> <p>21 precincts that were split in 105 and 111 prior</p> <p>22 to 2015?</p> <p>23 A I'm not sure I understand the</p> <p>24 question.</p> <p>25 Q Okay. What I'm trying -- sorry.</p>

142	<p>1 What I'm trying to get at is, if I wanted to</p> <p>2 know whether -- if I wanted to know whether</p> <p>3 105 -- strike that.</p> <p>4 105 and 111 did not change between</p> <p>5 2011 and 2014; correct?</p> <p>6 A The district lines you mean?</p> <p>7 Q The district lines.</p> <p>8 A Right, they did not change between</p> <p>9 those years.</p> <p>10 Q And you're not sure whether there</p> <p>11 were precinct changes between 105 and --</p> <p>12 A That's correct, I'm not sure, yeah.</p> <p>13 (Whereupon a document was identified as</p> <p>14 Plaintiff's Exhibit 19.)</p> <p>15 Q All right. I'm going to mark as</p> <p>16 Exhibit 19 a document that at the top says 2011</p> <p>17 House Plan, and the first number on the right</p> <p>18 hand corner is 1540.</p> <p>19 MR. STRICKLAND: What is the number</p> <p>20 on this again?</p> <p>21 MR. WILL: 19.</p> <p>22 MR. STRICKLAND: Okay.</p> <p>23 Q Ms. Wright, have you seen this</p> <p>24 document before?</p> <p>25 A Possibly.</p>	144	<p>1 Q And is this document created in the</p> <p>2 ordinary course of business of your office?</p> <p>3 A No. I would think this was</p> <p>4 probably a specially requested report. It's</p> <p>5 not something we normally standard produce.</p> <p>6 (Whereupon documents were identified</p> <p>7 as Plaintiff's Exhibit 20, Plaintiff's</p> <p>8 Exhibit 21, Plaintiff's Exhibit 22, and</p> <p>9 Plaintiff's Exhibit 23.)</p> <p>10 Q I'm going to go quickly through --</p> <p>11 I'm going to show you four plans. I'm going</p> <p>12 to mark the first as 20. It says Georgia</p> <p>13 House of Representatives: 2006. The number in</p> <p>14 the right-hand corner is 1388.</p> <p>15 21 is marked in the upper</p> <p>16 right-hand corner 1390, Georgia House of</p> <p>17 Representatives: 2006.</p> <p>18 1523, I want to mark as 21, and it</p> <p>19 says proposed Georgia House Districts.</p> <p>20 And then 22 has 1525 in the upper</p> <p>21 right-hand corner, and it says</p> <p>22 Exhibit B - 2011 House Plan.</p> <p>23 And I don't have a full set of</p> <p>24 copies for these documents.</p> <p>25 MR. POWERS: Their formats -- we're</p>
143	<p>1 Q Okay. When it says plan name</p> <p>2 hseprop1, what does that mean?</p> <p>3 A That's referring to the plan for the</p> <p>4 State House districts before it was adopted.</p> <p>5 Q It's intended to be House proposed</p> <p>6 one, is that what the shorthand's for?</p> <p>7 A Right, House proposal one.</p> <p>8 Q And House -- this plan was the plan</p> <p>9 that went into effect in 2011; correct?</p> <p>10 A I believe that is the case.</p> <p>11 Q Okay. Also up at the top, it says</p> <p>12 Administrator: H167. Do you know who that</p> <p>13 might be in reference to?</p> <p>14 A That would be Chairman Roger Lane.</p> <p>15 Q And so does that mean that this</p> <p>16 would be found in his folder?</p> <p>17 A Yes, at that point.</p> <p>18 Q Okay. And then at the bottom, it</p> <p>19 says, Report Prepared by the Legislative &</p> <p>20 Congressional Reapportionment Office. That's</p> <p>21 the office that you worked in; correct?</p> <p>22 A Yes.</p> <p>23 Q And still work in to this day;</p> <p>24 correct?</p> <p>25 A Yes.</p>	145	<p>1 starting from 20.</p> <p>2 MR. WILL: 20, 21, 22, 23.</p> <p>3 MR. GREENBAUM: All right. So 1388</p> <p>4 is 20; 1390 is 21; 1523 is 22; and 1525 is 23.</p> <p>5 MR. WILL: Actually, you have a</p> <p>6 set. Thanks.</p> <p>7 Q All right. Ms. Wright, let's start</p> <p>8 with Exhibit 20. Do you recognize number 20?</p> <p>9 A Yes.</p> <p>10 Q And what is it?</p> <p>11 A That is the State House map from</p> <p>12 2006.</p> <p>13 Q Okay. And how about number 21?</p> <p>14 A That is the same map zoomed in at</p> <p>15 the Atlanta metro area.</p> <p>16 Q And in this plan can you tell how</p> <p>17 many House districts were in Henry County? I</p> <p>18 count five.</p> <p>19 A Six.</p> <p>20 Q Six?</p> <p>21 A Uh-huh (affirmative).</p> <p>22 Q Can you name the six?</p> <p>23 A 90, 91, 78, 109, 110, 73.</p> <p>24 Q Okay. 78, 109.</p> <p>25 A The oranges are similar, but the</p>

146	<p>1 one in 78 is a little darker.</p> <p>2 Q So let's go back through that. So</p> <p>3 you have 78, which is orange?</p> <p>4 A Uh-huh (affirmative).</p> <p>5 Q 109, which is a different type of</p> <p>6 orange?</p> <p>7 A Uh-huh (affirmative).</p> <p>8 Q 91, which is purplish?</p> <p>9 A Correct.</p> <p>10 Q 90, which is blue?</p> <p>11 A Blue.</p> <p>12 Q 73, which is kind of a pinkish?</p> <p>13 A No. It's white looking, or I guess</p> <p>14 maybe it depends on your printer. Maybe it</p> <p>15 was a pale pink. It looks white on mine.</p> <p>16 Q Okay. And what's the sixth one?</p> <p>17 A 110.</p> <p>18 Q Oh, I see it in the green?</p> <p>19 A Green.</p> <p>20 Q All right. Thank you.</p> <p>21 A Uh-huh (affirmative).</p> <p>22 Q All right. And then moving on to</p> <p>23 22, do you recognize that?</p> <p>24 A I do.</p> <p>25 Q What is it?</p>	148	<p>1 document entitled NAACP versus Kemp, Document</p> <p>2 Production Volume 3, and at the top it says</p> <p>3 it's page 8747, and then it says</p> <p>4 J_4_2010_VTD_Layer_With_Gen.</p> <p>5 And I will tell you that this comes</p> <p>6 from a spreadsheet that was several hundred</p> <p>7 pages long, and all I was interested in was</p> <p>8 the headings. So I've just taken the</p> <p>9 portions, the pages from the spreadsheet that</p> <p>10 has the heading across the top.</p> <p>11 Ms. Wright, have you ever seen a</p> <p>12 spreadsheet that across the top has this level</p> <p>13 of information and it appears that it has</p> <p>14 election results in 2010 combined with racial</p> <p>15 demographics with respect to registration?</p> <p>16 A I have not seen this report before,</p> <p>17 no.</p> <p>18 Q Okay. Now, if -- when information,</p> <p>19 when data information, comes from the</p> <p>20 Secretary of State's Office to your office, is</p> <p>21 that something that they would send the data</p> <p>22 to Mr. Strangia who would then be the one that</p> <p>23 would input the data?</p> <p>24 A Yes.</p> <p>25 (Whereupon a document was identified</p>
147	<p>1 A This was the 2011 House map.</p> <p>2 Q Okay. And then 23, do you</p> <p>3 recognize that?</p> <p>4 A Yes.</p> <p>5 Q And what is that?</p> <p>6 A The metro Atlanta zoom-in of that</p> <p>7 same plan.</p> <p>8 (Whereupon a document was identified as</p> <p>9 Plaintiff's Exhibit 24.)</p> <p>10 Q Okay. I'm going to mark as</p> <p>11 Exhibit 24 a document entitled 2011 House map,</p> <p>12 and I'm going to give you my version because</p> <p>13 the other copies are messed up on the last</p> <p>14 page.</p> <p>15 MR. WILL: Thank you.</p> <p>16 Q Ms. Wright, do you recognize this</p> <p>17 document?</p> <p>18 A Yes.</p> <p>19 Q What is it?</p> <p>20 A This is the stat sheet that</p> <p>21 corresponds to the map that you showed me on</p> <p>22 22 and 23.</p> <p>23 (Whereupon a document was identified</p> <p>24 as Plaintiff's Exhibit 25.)</p> <p>25 Q Okay. Then I want to mark as 25 a</p>	149	<p>1 as Plaintiff's Exhibit 26.)</p> <p>2 Q Next, Ms. Wright, I am going to</p> <p>3 show you a document, mark it as Exhibit 26.</p> <p>4 It starts on page 9297 in the upper right-hand</p> <p>5 corner and goes through 9347, and it says</p> <p>6 House Prop1 Turnout Stats on the top of it.</p> <p>7 And this, again, is a spreadsheet,</p> <p>8 and so roughly every four pages across the top</p> <p>9 you'll see headings. Have you ever seen a</p> <p>10 spreadsheet like this before, Ms. Wright?</p> <p>11 A I've seen the data but not a report</p> <p>12 like this.</p> <p>13 Q Okay. And this data, is it correct</p> <p>14 to say that it has black and white and</p> <p>15 Hispanic registration and turnout numbers?</p> <p>16 A Let me look at it a minute.</p> <p>17 Q Like I said, if you go every four</p> <p>18 pages, you'll see the --</p> <p>19 A Yes, that appears to be what it</p> <p>20 has. I haven't gone all the way through it,</p> <p>21 but.</p> <p>22 (Whereupon a document was identified</p> <p>23 as Plaintiff's Exhibit 27.)</p> <p>24 Q Okay. Next document is 27. It's a</p> <p>25 document entitled Core Constituencies Report.</p>

150	<p>1 Ms. Wright, does this document look familiar</p> <p>2 at all to you?</p> <p>3 A I know what it is. I don't recall</p> <p>4 seeing it before, but that doesn't mean I</p> <p>5 didn't, but I don't remember seeing it before.</p> <p>6 Q Okay.</p> <p>7 A But I know what it is.</p> <p>8 Q What is it?</p> <p>9 A It's a report, standard Maptitude</p> <p>10 report, that you can run to compare a district</p> <p>11 to another -- or a plan to another plan to see</p> <p>12 how much of the district is within the</p> <p>13 proposed district, you know, on that other</p> <p>14 plan.</p> <p>15 Q And is it your understanding that</p> <p>16 this particular report that's in 27 is a</p> <p>17 comparison between the 2011 House Plan and the</p> <p>18 2006 House plan?</p> <p>19 A That looks to be what it is, yes.</p> <p>20 Q And then I want to, if you could go</p> <p>21 to -- I'm going to ask you about 105 and 111.</p> <p>22 A Oh.</p> <p>23 Q I can't give you a page number in</p> <p>24 terms of where they are, but the districts,</p> <p>25 the districts are in order.</p>	152	<p>1 create a new district that was an open seat</p> <p>2 that had no incumbent that had not previously</p> <p>3 been in that location, all of that district's</p> <p>4 population and area was taken from other</p> <p>5 districts previously to create a new seat</p> <p>6 there.</p> <p>7 Q Do you recall when Representative</p> <p>8 Strickland was first elected to the house?</p> <p>9 A I believe he was elected in 2012.</p> <p>10 The other thing to note with the</p> <p>11 House districts in particular is that House</p> <p>12 district numbering is redone when we redraw a</p> <p>13 state map.</p> <p>14 So whereas the Senate districts</p> <p>15 maintain their numbers in wherever, you know,</p> <p>16 they, they are, if the district relocates</p> <p>17 because of growth in one part of the state,</p> <p>18 the district number goes with where the new</p> <p>19 district is.</p> <p>20 The House does not do that. The</p> <p>21 House, we start from the top left corner, and</p> <p>22 we start renumbering again. So the numbers</p> <p>23 oftentimes change significantly from one</p> <p>24 decade to the next based on where the growth</p> <p>25 is and where there are more districts</p>
151	<p>1 A Okay.</p> <p>2 Q And with respect to House</p> <p>3 District 105, would it be accurate to say that</p> <p>4 House District 105 was taken from three</p> <p>5 districts in the 2006 plan, Districts 104,</p> <p>6 106, and 107?</p> <p>7 A It's a little difficult to use this</p> <p>8 report to compare two plans such as these</p> <p>9 simply because your numbers of districts</p> <p>10 change so drastically in the House based on</p> <p>11 where the population growth is.</p> <p>12 So House District 105 was a</p> <p>13 district that was created there where there</p> <p>14 was no incumbent. There was a new district</p> <p>15 added to the county. So, of course, because</p> <p>16 it was not previously existing where it is</p> <p>17 now, it would be coming from three other</p> <p>18 districts because it didn't come from itself.</p> <p>19 Q Okay. And then moving on to 111,</p> <p>20 is it the case that there were portions of six</p> <p>21 districts in the 2006 plan that made up the</p> <p>22 geography of House District 111?</p> <p>23 A Yes. And that's the same situation</p> <p>24 with 111 that was with 105. The district did</p> <p>25 not previously exist there, so in order to</p>	153	<p>1 concentrated than before.</p> <p>2 (Whereupon a document was identified as</p> <p>3 Plaintiff's Exhibit 28.)</p> <p>4 Q Thank you. I want to mark as</p> <p>5 Exhibit 28 Georgia Cities by Legislative and</p> <p>6 Congressional District. Ms. Wright, do you</p> <p>7 recognize this document?</p> <p>8 A I do.</p> <p>9 Q What is it?</p> <p>10 A This is our joint city report.</p> <p>11 Q And what does it show?</p> <p>12 A This would have been the version</p> <p>13 that was done in 2012. It shows a list of all</p> <p>14 the cities in Georgia and the House, Senate,</p> <p>15 and Congressional districts that are within</p> <p>16 that city.</p> <p>17 Q So if you go to what would be the</p> <p>18 seventh page, I'm interested in Lawrenceville.</p> <p>19 And do -- and does this reflect the city of</p> <p>20 Lawrenceville as divided up into six</p> <p>21 districts?</p> <p>22 A Yes.</p> <p>23 Q And are you aware that the</p> <p>24 population of Lawrenceville as of the 2010</p> <p>25 census was less than 30,000?</p>

154	<p>1 A No.</p> <p>2 (Whereupon a document was identified as</p> <p>3 Plaintiff's Exhibit 29.)</p> <p>4 Q I want to mark as Exhibit 29 the</p> <p>5 2010 Democratic -- demographic profile for</p> <p>6 Lawrenceville. Is it correct, Ms. Wright,</p> <p>7 that the population of Lawrenceville as of the</p> <p>8 2010 census was less than 30,000?</p> <p>9 A Shows it to be so, yes.</p> <p>10 Q And is it correct that it's about</p> <p>11 the, population size, about the size of half</p> <p>12 the district in terms of the population?</p> <p>13 A More or less, yes.</p> <p>14 Q Were you aware at the time that the</p> <p>15 House plan was produced that the mayor of</p> <p>16 Lawrenceville objected to the dividing of</p> <p>17 Lawrenceville into six districts?</p> <p>18 A No, I was not.</p> <p>19 Q Were you aware that in -- strike</p> <p>20 that.</p> <p>21 Did you go to any of the hearings</p> <p>22 that the General Assembly held with respect to</p> <p>23 the 2011 plan?</p> <p>24 A Yes.</p> <p>25 Q Do you recall at any of those</p>	156	<p>1 at, using the pages on the bottom right, if</p> <p>2 you look on the bottom of page 177 and up to</p> <p>3 page 178, there's a gentleman named Lee</p> <p>4 Thompson.</p> <p>5 MR. STRICKLAND: Wait a minute.</p> <p>6 Could you give those page numbers again?</p> <p>7 MR. GREENBAUM: Yes. Bottom of 177</p> <p>8 onto 178.</p> <p>9 MR. STRICKLAND: Sorry.</p> <p>10 MR. WILL: It's the transcript page</p> <p>11 177. It's 2190 Bates stamp.</p> <p>12 MR. STRICKLAND: Got it.</p> <p>13 Q And you see that he testified that</p> <p>14 Lawrenceville had currently been contained in</p> <p>15 one legislative district? Do you see that?</p> <p>16 A Uh-huh (affirmative).</p> <p>17 Q Do you recall whether you attended</p> <p>18 the meeting?</p> <p>19 A I do not.</p> <p>20 Q Okay. And it noted the</p> <p>21 demographics of Lawrenceville being 38 percent</p> <p>22 white, 31 percent African-American, 22 percent</p> <p>23 Hispanic. Do you see that?</p> <p>24 A Uh-huh (affirmative), I do.</p> <p>25 Q And you see the statement that the</p>
155	<p>1 hearings anybody raising the issue of the</p> <p>2 division of Lawrenceville into multiple</p> <p>3 districts?</p> <p>4 A No.</p> <p>5 (Whereupon a document was identified as</p> <p>6 Plaintiff's Exhibit 30.)</p> <p>7 Q I want to mark as Exhibit 9</p> <p>8 excerpts of --</p> <p>9 MR. POWERS: 29.</p> <p>10 Q 29, I want to mark as Exhibit 29 --</p> <p>11 MR. WILL: How about 30? That last</p> <p>12 one was 29.</p> <p>13 MR. POWERS: Oh, okay.</p> <p>14 MR. GREENBAUM: All right. Sorry.</p> <p>15 MR. WILL: No problem.</p> <p>16 Q I want to mark as Exhibit 30</p> <p>17 excerpts of the meeting -- the transcript of</p> <p>18 the Meeting of the Georgia House of</p> <p>19 Representatives Reapportionment Committee on</p> <p>20 August 6th, 2011.</p> <p>21 Ms. Wright, do you recall one way</p> <p>22 or the other whether you attended that</p> <p>23 meeting?</p> <p>24 A I do not recall.</p> <p>25 Q Okay. I want to -- if you'll look</p>	157	<p>1 city has been divided into six legislative</p> <p>2 districts?</p> <p>3 A Yes.</p> <p>4 Q And that's in fact what happened</p> <p>5 was that the city was divided into six</p> <p>6 legislative districts?</p> <p>7 A Is that a question?</p> <p>8 Q Was the city divided into six</p> <p>9 legislative districts in fact?</p> <p>10 A Yes.</p> <p>11 Q And is it a fair characterization</p> <p>12 of Mr. Thompson's testimony that he was</p> <p>13 opposed to the city of Lawrenceville being</p> <p>14 divided into several districts?</p> <p>15 A It appears that he did not like it</p> <p>16 being divided into that many districts, yes.</p> <p>17 MR. GREENBAUM: Thank you.</p> <p>18 MR. POWERS: Can we go off the</p> <p>19 record for just a second?</p> <p>20 THE VIDEOGRAPHER: Going off video</p> <p>21 record.</p> <p>22 (Whereupon off-the-record discussions</p> <p>23 ensued.)</p> <p>24 THE VIDEOGRAPHER: Back on video</p> <p>25 record.</p>

158	<p>1 (Whereupon a document was identified as</p> <p>2 Plaintiff's Exhibit 31.)</p> <p>3 Q Ms. Wright, I want to show you a</p> <p>4 document entitled Georgia House Districts -</p> <p>5 2012.</p> <p>6 MR. POWERS: Is there an extra?</p> <p>7 MR. WILL: Yes, sir.</p> <p>8 Q Ms. Wright, do you recognize this</p> <p>9 document?</p> <p>10 A Yes.</p> <p>11 Q What is it?</p> <p>12 A This would be the State House map</p> <p>13 after changes were made during session,</p> <p>14 regular session of 2012.</p> <p>15 Q And the map, there appears to be a</p> <p>16 state map and then following it a series of</p> <p>17 regional maps; is that correct?</p> <p>18 A Yes.</p> <p>19 Q And then the demographic data and a</p> <p>20 report following that?</p> <p>21 A Yes, that's correct.</p> <p>22 Q All right. All right. We're going</p> <p>23 to start looking at the big plans now, the</p> <p>24 2012 plan. I'm going to -- we'll start with</p> <p>25 Gwinnett County on Exhibit 3. And,</p>	160	<p>1 versus the 105 section of Lawrenceville D?</p> <p>2 A I'm not aware of a basic report we</p> <p>3 have to do that.</p> <p>4 Q Do you, do you know who made the</p> <p>5 decisions in terms of splitting those</p> <p>6 precincts in 2012?</p> <p>7 A I do not.</p> <p>8 Q All right. Let's, let's move on to</p> <p>9 the Henry County 2012 map.</p> <p>10 MR. WILL: You see it okay?</p> <p>11 THE WITNESS: It's okay.</p> <p>12 Q And I take it you might be more</p> <p>13 familiar with Henry County in the 2011/2012</p> <p>14 time, those plans, with respect to 111 than</p> <p>15 you were with Gwinnett?</p> <p>16 A Probably so, yes.</p> <p>17 Q Okay. And then what precincts in</p> <p>18 Henry County were split? Strike that.</p> <p>19 What precincts in District 111 were</p> <p>20 split?</p> <p>21 A McDonough Central, North Hampton.</p> <p>22 That looks to be the only two that I can see.</p> <p>23 Q How about Grove Park?</p> <p>24 A No, it was not split. Well, that's</p> <p>25 the little quirk thing. Yeah, I guess it is</p>
159	<p>1 Ms. Wright, according to the 2012 plan,</p> <p>2 Exhibit 3, and pre -- and District 105, what,</p> <p>3 what precincts were split in District 105?</p> <p>4 A Baycreek H, Lawrenceville M, and</p> <p>5 Lawrenceville D.</p> <p>6 Q Do you know why Baycreek H, why</p> <p>7 that precinct was split?</p> <p>8 A Population would be my only</p> <p>9 justification for that.</p> <p>10 Q So only to keep population equal?</p> <p>11 A I would think so, yes.</p> <p>12 Q How about with respect to</p> <p>13 Lawrenceville M?</p> <p>14 A Most likely the same thing, but I</p> <p>15 can't say that. I mean --</p> <p>16 Q And how about Lawrenceville D?</p> <p>17 A The same most likely, for</p> <p>18 population reasons.</p> <p>19 Q Okay. Do you, do you have a way</p> <p>20 of -- is there a report that you can generate</p> <p>21 that would show for split precincts what the</p> <p>22 demographics are in terms of, you know, let's</p> <p>23 take Lawrenceville D, for example, what the</p> <p>24 population including the racial demographics</p> <p>25 are in the 104 section of Lawrenceville D</p>	161	<p>1 split with the precinct line and the city</p> <p>2 limit thing. That's -- I don't know that</p> <p>3 there were any population involved in that</p> <p>4 area, but it's a --</p> <p>5 It is a little bit of a line issue</p> <p>6 there with the way the precinct line falls on</p> <p>7 the new version. I think we had some</p> <p>8 corrections with, with that with the city</p> <p>9 limit line.</p> <p>10 Q So in terms of Grove Park, part of</p> <p>11 the explanation might have had to do with the</p> <p>12 city limits in terms of why that precinct was</p> <p>13 split?</p> <p>14 A Yes.</p> <p>15 Q What about the split with North</p> <p>16 Hampton?</p> <p>17 A That too was population related, I</p> <p>18 believe.</p> <p>19 Q And then what about McDonough</p> <p>20 Central?</p> <p>21 A I think that was also population</p> <p>22 related.</p> <p>23 (Whereupon a document was identified</p> <p>24 as Plaintiff's Exhibit 32.)</p> <p>25 Q I'm going to mark as Exhibit 32 a</p>

162	<p>1 one-page spreadsheet, and this is something</p> <p>2 that the Plaintiffs have created that attempts</p> <p>3 to show for 2012 in 105 and 111 what the</p> <p>4 demographics were of each precinct.</p> <p>5 Now, according to this -- we'll</p> <p>6 start with Baycreek H -- and actually we'll</p> <p>7 start with Lawrenceville D. And you see that,</p> <p>8 as you said, it's split between 104 and 105.</p> <p>9 And if you look way over in the</p> <p>10 bottom right-hand -- not the bottom, but all</p> <p>11 the way in the right-hand side, it has the Any</p> <p>12 Part Black VAP numbers. Yeah, if you need</p> <p>13 to -- if you need to look at that, that's</p> <p>14 fine.</p> <p>15 And according to this, the black</p> <p>16 population for this split precinct that is in</p> <p>17 104 has a higher percentage than the black</p> <p>18 population for Lawrenceville D that is in 105.</p> <p>19 Do you know one way or the other if that was</p> <p>20 in fact the case for the 2012 plan?</p> <p>21 A I do not know.</p> <p>22 Q Okay. So you don't, you don't have</p> <p>23 any cause to know one way or the other whether</p> <p>24 these numbers are correct?</p> <p>25 A No, I don't.</p>	164	<p>1 Do you have an understanding in</p> <p>2 terms of, in that North Hampton area, where</p> <p>3 the black population is primarily housed?</p> <p>4 A No, I don't know that.</p> <p>5 MR. GREENBAUM: Okay. You know</p> <p>6 what? Can we take, can we take a two-minute</p> <p>7 break --</p> <p>8 MR. STRICKLAND: Sure.</p> <p>9 MR. GREENBAUM: -- to get</p> <p>10 reorganized a little bit?</p> <p>11 THE VIDEOGRAPHER: Going off the</p> <p>12 video record at 2:00 p.m.</p> <p>13 (Proceedings in recess, 2:00 p.m. to</p> <p>14 2:10 p.m.)</p> <p>15 THE VIDEOGRAPHER: Okay. We are</p> <p>16 now back on video record at 2:10 p.m.</p> <p>17 (Whereupon a document was identified as</p> <p>18 Plaintiff's Exhibit 33.)</p> <p>19 Q Ms. Wright, I am going to mark as</p> <p>20 Exhibit 33, it's a chain of four pages of</p> <p>21 emails numbered in the upper right-hand corner</p> <p>22 1065 to 1068. Ms. Wright, do you recognize</p> <p>23 this email chain?</p> <p>24 A Yes.</p> <p>25 Q And what is this email chain</p>
163	<p>1 Q Okay. And then, you know, at the</p> <p>2 bottom for District 105, you have</p> <p>3 Lawrenceville M, and, again, that's, that is a</p> <p>4 split precinct. And according to this, the</p> <p>5 percentage of black population that is in the</p> <p>6 104 section of Lawrenceville M is higher than</p> <p>7 the percentage of black population that is in</p> <p>8 the 105 portion of Lawrenceville M.</p> <p>9 Do you have reason to know one way</p> <p>10 or another whether these numbers are accurate?</p> <p>11 A No, I don't know.</p> <p>12 Q Okay. Okay. So let's, let's move</p> <p>13 to, let's move to Henry County. I want to</p> <p>14 focus on the North Hampton split between 73</p> <p>15 and 111.</p> <p>16 And according to this, the black</p> <p>17 population -- the percentage of black</p> <p>18 population in the District 73 portion of North</p> <p>19 Hampton is, if I'm reading this right, about</p> <p>20 40 percent, and for that of the 111 portion,</p> <p>21 it's 28.5 percent; is that correct?</p> <p>22 A That's what this report shows.</p> <p>23 Q Okay. And, you know, looking at</p> <p>24 North Hampton, the North Hampton precinct, can</p> <p>25 you -- okay.</p>	165	<p>1 concerning?</p> <p>2 A This is emailing with the Secretary</p> <p>3 of State's office to, to obtain -- the process</p> <p>4 of obtaining the, the file for them for, looks</p> <p>5 like, the 2014 layer, precinct layer.</p> <p>6 Q Okay. So the first, the first one</p> <p>7 of these emails is on October 21st, 2014; is</p> <p>8 that correct?</p> <p>9 A Yes.</p> <p>10 Q And it's sent from you to Linda</p> <p>11 Ford and Erica Hamilton. Who are Ms. Ford and</p> <p>12 Ms. Hamilton?</p> <p>13 A Linda Ford was the director of</p> <p>14 elections for the Secretary of State at that</p> <p>15 time, and Erica Hamilton worked in the</p> <p>16 elections office there.</p> <p>17 Q Okay. So I'll ask you some things</p> <p>18 about this initial email. It talks about</p> <p>19 wanting to go ahead and put in the request for</p> <p>20 the 2014 election data in the same format as</p> <p>21 usual. What, what's the format?</p> <p>22 A I don't know.</p> <p>23 Q Mr. Strangia would be the person?</p> <p>24 A They knew -- right, because every</p> <p>25 two years we would request that file, so they</p>

166	<p>1 knew what it was that we needed from them, so.</p> <p>2 Q And so typically the Secretary of</p> <p>3 State's office and Strangia would work out the</p> <p>4 details. You just knew that it was a standard</p> <p>5 file that was sent to Mr. Strangia to input</p> <p>6 after every election. Correct?</p> <p>7 A Right.</p> <p>8 Q In the second paragraph towards the</p> <p>9 end, you say, "it is most important this year</p> <p>10 especially that we have the file before the</p> <p>11 end of the calendar year." Why was it</p> <p>12 especially important in 2014?</p> <p>13 A Where are you?</p> <p>14 Q On the bottom of 1067.</p> <p>15 A We've typically had difficulty</p> <p>16 getting the file from them so that we can have</p> <p>17 that into our system in time to review, and if</p> <p>18 the members want to review that for whatever</p> <p>19 purposes, they like to see the data following</p> <p>20 an election.</p> <p>21 By asking for it by the end of the</p> <p>22 calendar year, I had hoped that that would</p> <p>23 speed along the process and get the file to us</p> <p>24 quicker. I'm not so sure that it worked, but</p> <p>25 it was an attempt.</p>	168	<p>1 would they necessarily reach out to you, or is</p> <p>2 it possible they could have reached out to</p> <p>3 someone else in your office?</p> <p>4 A It's possible they could have</p> <p>5 reached out to someone else in the office.</p> <p>6 Q Is there a standard operating</p> <p>7 procedure with respect to that?</p> <p>8 A No.</p> <p>9 Q Now, in the last sentence in the</p> <p>10 first paragraph of the next page, 1068, it</p> <p>11 says, "We simply cannot wait until March to</p> <p>12 get this data knowing we need the time to</p> <p>13 allocate this to our geography and be able to</p> <p>14 review it before session."</p> <p>15 Why was it important that it be</p> <p>16 reviewed before session?</p> <p>17 A Well, as you just said, you alluded</p> <p>18 to the fact there were members who wanted to</p> <p>19 review the data, so if they were going to</p> <p>20 review the data, see if there was anything</p> <p>21 that was concerning to them, they wanted to</p> <p>22 have that while they were in session.</p> <p>23 Otherwise, it wouldn't be -- there would be no</p> <p>24 time to do anything if they wanted to.</p> <p>25 Q All right. So you get a response</p>
167	<p>1 MR. WILL: That was the plan.</p> <p>2 THE WITNESS: That was the plan.</p> <p>3 Q Was, was -- did any -- strike that.</p> <p>4 By October 21st, were you aware</p> <p>5 that some legislators wanted to do a</p> <p>6 redistricting after the 2014 election?</p> <p>7 A At that point, I knew they wanted</p> <p>8 to review the data.</p> <p>9 Q Now, you mentioned before that the</p> <p>10 incumbent in District 105, Ms. Chandler,</p> <p>11 before the election had indicated to you that</p> <p>12 she was interested in redistricting her</p> <p>13 district; correct?</p> <p>14 A Correct.</p> <p>15 Q Had there been other legislators</p> <p>16 that had reached out to you in terms of</p> <p>17 expressing interest in a redistricting in</p> <p>18 2015?</p> <p>19 A I believe there were. Like I said,</p> <p>20 there were some who wanted to look at the</p> <p>21 data, so I believe there were several who --</p> <p>22 I'm not sure who exactly, but there were some,</p> <p>23 I think, that just wanted to be able to see</p> <p>24 that.</p> <p>25 Q Okay. If they wanted to see it,</p>	169	<p>1 back from Merritt Beaver; is that correct?</p> <p>2 A Yes.</p> <p>3 Q On the 22nd. And what was</p> <p>4 Mr. Beaver's role in the Secretary of State's</p> <p>5 office?</p> <p>6 A He's the chief information officer</p> <p>7 for Secretary Kemp, or he was. I assume he</p> <p>8 still is.</p> <p>9 Q And then you email him back on</p> <p>10 December 5th seeking to follow up, correct,</p> <p>11 because you hadn't gotten a response?</p> <p>12 A Yes, that's correct.</p> <p>13 Q And then he gets back to you on the</p> <p>14 17th of December and says they're hoping to</p> <p>15 have it complete by the end of the month;</p> <p>16 correct?</p> <p>17 A Yes.</p> <p>18 Q Okay. And then he gets back to you</p> <p>19 on January 7th; correct?</p> <p>20 A Yes. There could have been an</p> <p>21 email between the two where I was not copied</p> <p>22 it looks like. I don't know that for a fact,</p> <p>23 but I would assume so because he's referring</p> <p>24 to precinct name differences that we had.</p> <p>25 (Whereupon a document was identified as</p>

170	<p>1 Plaintiff's Exhibit 34.)</p> <p>2 Q Okay. Then I'm going to mark as</p> <p>3 the next exhibit, I think it's 34. Thank you.</p> <p>4 I want to mark as Exhibit 34 a document that</p> <p>5 is numbered in the upper right-hand corner</p> <p>6 1059 to 1063.</p> <p>7 Actually, I'm going to go ahead</p> <p>8 and, before you look at that, finish up with</p> <p>9 33, the document that you were just looking</p> <p>10 at.</p> <p>11 Cooley ultimate -- Gary Cooley,</p> <p>12 who's assistant programmer for the Secretary of</p> <p>13 State; correct?</p> <p>14 A He was, yes.</p> <p>15 Q And he says that he attaches the</p> <p>16 general election results and voter</p> <p>17 registration demographic and voting history</p> <p>18 numbers by precinct; correct?</p> <p>19 A Yes, that's what he says.</p> <p>20 Q And as far as you know, is this the</p> <p>21 standard report that you get after every</p> <p>22 election?</p> <p>23 A As far as I know, I guess, yes. I</p> <p>24 don't know.</p> <p>25 Q And I assume that you --</p>	172	<p>1 Do you have any cause to believe</p> <p>2 that you didn't in fact send and receive these</p> <p>3 emails?</p> <p>4 A Say that one more time?</p> <p>5 MR. WILL: I'm sorry. I didn't get</p> <p>6 it either.</p> <p>7 Q Yeah. What I'm trying to get is:</p> <p>8 You don't recall sending and receiving these</p> <p>9 emails, but given the fact that it has your</p> <p>10 name sending and receiving these emails, you</p> <p>11 don't have any cause to believe that you</p> <p>12 didn't send and receive them; correct?</p> <p>13 A Correct.</p> <p>14 Q All right.</p> <p>15 A It was apparently a request for</p> <p>16 someone who asked for it, so I mediated on</p> <p>17 behalf of whichever member asked for it.</p> <p>18 Q Okay. So as far as you know, there</p> <p>19 was a member that asked for that document?</p> <p>20 A That's what it says in the email.</p> <p>21 Q Okay.</p> <p>22 A I'm just referring to -- I don't</p> <p>23 know.</p> <p>24 Q Yes. And you don't happen to</p> <p>25 remember which member asked for it, do you?</p>
171	<p>1 Mr. Strangia is cc'd on this. As far as you</p> <p>2 know, he didn't have to do any further</p> <p>3 follow-up in terms of this report?</p> <p>4 A We have had several times, when we</p> <p>5 obtained the file, we've had problems with the</p> <p>6 file. We've had to go back and forth several</p> <p>7 times with them to make the correction, and</p> <p>8 that's some of what this is here, I think,</p> <p>9 that there was a problem with it. I don't, I</p> <p>10 don't know if there was additional issues that</p> <p>11 they had to reconcile.</p> <p>12 Q Okay. All right. So I'm going to</p> <p>13 move on to 34 now. And this is two pages of</p> <p>14 emails followed by a four-page report titled</p> <p>15 Voter Registration System, Active Voters By</p> <p>16 Race and Gender Within County. And this is,</p> <p>17 this is a --</p> <p>18 Do you recognize this document,</p> <p>19 this document, Ms. Wright?</p> <p>20 A I know what it is, yes.</p> <p>21 Q Okay. And as well as do you</p> <p>22 recognize the emails that precede it?</p> <p>23 A I don't, actually.</p> <p>24 Q Okay. But as far as you know,</p> <p>25 these -- you did send -- strike that.</p>	173	<p>1 A I don't.</p> <p>2 Q And do you know why in 2014 they</p> <p>3 were interested in knowing the active voters</p> <p>4 by race and gender for each county for 2010?</p> <p>5 A I do not know. We have some</p> <p>6 members who are interested in all that sort of</p> <p>7 thing, so I have no idea.</p> <p>8 (Whereupon a document was identified as</p> <p>9 Plaintiff's Exhibit 35.)</p> <p>10 Q All right. Thank you. Okay. Next</p> <p>11 is 35.</p> <p>12 All right. Now is the point where</p> <p>13 we're going to be asking you to fish out of</p> <p>14 the big pile 112 and 113, if you would look in</p> <p>15 the bottom right-hand corner. And there's a</p> <p>16 stapler here.</p> <p>17 MR. WILL: It's right in front of</p> <p>18 you.</p> <p>19 A Is that the GA --</p> <p>20 Q Uh-huh (affirmative).</p> <p>21 MR. STRICKLAND: You going by the</p> <p>22 number on the bottom?</p> <p>23 MR. GREENBAUM: We're going to use</p> <p>24 the numbers on the bottom where it's the GA.</p> <p>25 Q And why don't you go ahead and</p>

174	<p>1 staple those two pages.</p> <p>2 A Which? 12 and 13?</p> <p>3 Q 12 and 13, 112 and 113. And we're</p> <p>4 going to call GA 112 and 113 Exhibit 35.</p> <p>5 Do you recognize this document,</p> <p>6 Ms. Wright?</p> <p>7 A I do.</p> <p>8 Q And could you say who Mr. Rutledge</p> <p>9 is?</p> <p>10 A He is the representative from</p> <p>11 District 109.</p> <p>12 Q And his email from -- his first</p> <p>13 email from February 27th says Subject is</p> <p>14 redistricting and then it says, "Hey, just</p> <p>15 checking to see where we are with it. Been</p> <p>16 crazy this week."</p> <p>17 When he says "where we are with</p> <p>18 it," is he referring to a new redistricting</p> <p>19 plan?</p> <p>20 A He was referring to whether or not,</p> <p>21 if I recall correctly, whether or not we</p> <p>22 were -- because we had -- we were looking at</p> <p>23 the data and looking at the district at that</p> <p>24 point to see if there was anything to be done.</p> <p>25 Q And what was Mr. Rutledge</p>	176	<p>1 Democratic candidate?</p> <p>2 A Yes.</p> <p>3 Q When -- do you recall who</p> <p>4 Representative Strickland ran against in 2012?</p> <p>5 A As far as their name or what do</p> <p>6 you --</p> <p>7 Q Well, we'll start with their name.</p> <p>8 Do you recall if he ran against an</p> <p>9 African-American candidate or white candidate</p> <p>10 in 2012?</p> <p>11 A I believe it was an</p> <p>12 African-American candidate in '12.</p> <p>13 Q And do you know if that election</p> <p>14 was close as well?</p> <p>15 A I don't think that it was as close</p> <p>16 as the '14 election, but I don't remember the</p> <p>17 specific numbers.</p> <p>18 Q Now, Representative Rutledge in</p> <p>19 111, how closely was his election contested in</p> <p>20 2014?</p> <p>21 A Representative Rutledge is 109. I</p> <p>22 don't know the numbers for his reelections. I</p> <p>23 don't know that he had opposition in all of</p> <p>24 those years either.</p> <p>25 Q Okay. Did Representative Rutledge</p>
175	<p>1 interested in with respect to District 109?</p> <p>2 A He had previously inquired about</p> <p>3 the political data of his district and the</p> <p>4 surrounding districts, for Representative</p> <p>5 Strickland's district in particular and his</p> <p>6 own, so this was a follow-up, I think, to that</p> <p>7 to see if there was any -- what the data would</p> <p>8 reveal.</p> <p>9 Q And why was he interested in</p> <p>10 Representative Strickland's district?</p> <p>11 A His, his district borders</p> <p>12 alongside -- Strickland's and Rutledge's</p> <p>13 districts border alongside each other, and</p> <p>14 politically they were concerned about</p> <p>15 maintaining that district for Representative</p> <p>16 Strickland if he could get reelected.</p> <p>17 Q And in 2014, Representative</p> <p>18 Strickland had a relatively close race;</p> <p>19 correct?</p> <p>20 A I believe so.</p> <p>21 Q And is it correct that he ran</p> <p>22 against an African-American Democratic</p> <p>23 candidate in that election?</p> <p>24 A I think that's incorrect.</p> <p>25 Q Okay. You think it was a white</p>	177	<p>1 ever suggest that you could change the</p> <p>2 composition of his district to help</p> <p>3 Representative Strickland in his district, win</p> <p>4 reelection in his district?</p> <p>5 A Yes.</p> <p>6 Q What did he tell you specifically?</p> <p>7 A He didn't tell me anything</p> <p>8 specific.</p> <p>9 Q Did any of the other legislators in</p> <p>10 Henry County suggest to you that you could</p> <p>11 change the composition of their districts to</p> <p>12 help out Representative Strickland?</p> <p>13 A Yes.</p> <p>14 Q What other legislators did?</p> <p>15 A Representative Welch. And I don't</p> <p>16 know that I had conversations with</p> <p>17 Representative Knight and Representative Yates</p> <p>18 prior to making any changes or looking at the</p> <p>19 map, but they were willing, from what I</p> <p>20 understood, to help him if there was something</p> <p>21 they could do.</p> <p>22 Q Okay. Did -- during this time</p> <p>23 frame, did Representative Strickland ever meet</p> <p>24 with you in your office?</p> <p>25 A Yes.</p>

178	<p>1 Q How about Representative Rutledge?</p> <p>2 A I don't recall.</p> <p>3 Q Do you recall any of the</p> <p>4 legislators in -- from Henry County suggesting</p> <p>5 particular changes to you?</p> <p>6 A No.</p> <p>7 Q It never happened, or you just</p> <p>8 don't recall it?</p> <p>9 A It never happened.</p> <p>10 Q So they entrusted you to make the</p> <p>11 specific changes?</p> <p>12 A Yes.</p> <p>13 (Whereupon a document was identified as</p> <p>14 Plaintiff's Exhibit 36.)</p> <p>15 Q Okay. All right. I want to mark</p> <p>16 as Exhibit 36 kind of a series of election</p> <p>17 results from 2014 involving seven districts</p> <p>18 that we've been talking about, the five from</p> <p>19 Henry County, District 73, District 109,</p> <p>20 District 110, District 111, District 130, and</p> <p>21 then from Gwinnett Districts 104 and 105.</p> <p>22 MR. STRICKLAND: That's not out of</p> <p>23 the big stack?</p> <p>24 MR. GREENBAUM: Not out of the big</p> <p>25 stack.</p>	180	<p>1 It wouldn't reflect the full results of the</p> <p>2 election. Correct?</p> <p>3 A Yes, I see those are just the Henry</p> <p>4 precincts listed.</p> <p>5 Q Okay. So let's, let's go to the</p> <p>6 page, I think it's the fourth page, involving</p> <p>7 District 111. And let me ask you about a</p> <p>8 couple of the precinct results.</p> <p>9 Is it fair to say that</p> <p>10 Representative Nichols received the</p> <p>11 predominant amount of the vote in Stockbridge</p> <p>12 west of the precinct?</p> <p>13 A Mr. Nichols --</p> <p>14 MR. WILL: Mr. Nichols --</p> <p>15 A -- isn't a representative.</p> <p>16 Q All right. I'll reask the</p> <p>17 question.</p> <p>18 MR. WILL: I just wanted to make</p> <p>19 sure you're asking -- which one you're asking</p> <p>20 about, representative or Mr. Nichols.</p> <p>21 THE WITNESS: And I wasn't sure</p> <p>22 which one you're asking either.</p> <p>23 Q Yeah, okay. So we're talking about</p> <p>24 111 in 2014, and it's Candidate Nichols</p> <p>25 running against Representative Strickland, and</p>
179	<p>1 MR. STRICKLAND: Okay.</p> <p>2 MR. GREENBAUM: We're going back to</p> <p>3 the big stack though.</p> <p>4 MR. STRICKLAND: All right.</p> <p>5 MR. GREENBAUM: Just not right now.</p> <p>6 Q So, Ms. Wright, when you were</p> <p>7 looking at doing the redistricting in Henry</p> <p>8 County in 2015, did you pay attention to what</p> <p>9 had happened at the precinct level in 2014?</p> <p>10 A Yes.</p> <p>11 Q And so -- and this answers one of</p> <p>12 our questions with respect to Mr. Rutledge</p> <p>13 that in fact Mr. Rutledge, this is on the</p> <p>14 second page, that Mr. Rutledge did not have an</p> <p>15 opponent in 2014; correct?</p> <p>16 A Yes.</p> <p>17 Q And also Representative Knight in</p> <p>18 District 130 didn't have an opponent either;</p> <p>19 correct?</p> <p>20 A Yes.</p> <p>21 Q Representative Welch did, and he</p> <p>22 won by about 1,600 votes; is that correct?</p> <p>23 A That appears to be correct.</p> <p>24 Q And then -- or actually this, this</p> <p>25 only reflects the results within Henry County.</p>	181	<p>1 I want to focus on the Stockbridge West</p> <p>2 precinct.</p> <p>3 And is it correct that Candidate</p> <p>4 Nichols received 1,220 votes and Candidate</p> <p>5 Strickland, the incumbent, received 265 votes?</p> <p>6 A That's correct.</p> <p>7 Q Is it fair to say that that</p> <p>8 precinct was the precinct in which</p> <p>9 Representative Strickland had the weakest</p> <p>10 performance?</p> <p>11 A Yeah, that looks to be true.</p> <p>12 Q When you sought to redistrict</p> <p>13 District 111 in 2015, were you conscious of</p> <p>14 the fact that the Stockbridge West precinct</p> <p>15 was the precinct in which Strickland had</p> <p>16 performed the worst in 2014?</p> <p>17 A I'm not certain that I knew it was</p> <p>18 his worst precinct, but I knew that it was a</p> <p>19 precinct that Mr. Nichols won.</p> <p>20 Q And did you know that Mr. Nichols</p> <p>21 had won it by a relatively significant amount?</p> <p>22 A I may have realized that then, but</p> <p>23 I don't know now whether I -- what I, what I</p> <p>24 was looking at then.</p> <p>25 Q Yeah. Were you conscious when you</p>

182	<p>1 were redistricting in 2015 to take that</p> <p>2 precinct out of District 111?</p> <p>3 A Well, if you were looking at the</p> <p>4 map to do that, that precinct is on the very</p> <p>5 northern tip of the map with one precinct</p> <p>6 above it, so because of the shape of the</p> <p>7 district as well as the fact that that was a</p> <p>8 Democratic precinct, it was sort of an obvious</p> <p>9 precinct to move.</p> <p>10 Q Particularly if the goal of the</p> <p>11 redistricting was to make Representative</p> <p>12 Strickland's seat safer; correct?</p> <p>13 A Correct.</p> <p>14 Q And were you aware of the racial</p> <p>15 demographics of that precinct?</p> <p>16 A I can't recall if I -- what I knew</p> <p>17 of the racial demographics of the precinct.</p> <p>18 Q Okay. And you testified earlier</p> <p>19 that you were aware that the northern part of</p> <p>20 the county in the part of the county closest</p> <p>21 to Clayton County had grown the most since</p> <p>22 2000 and also had the largest concentrations</p> <p>23 of African-Americans; correct?</p> <p>24 A That's correct.</p> <p>25 MR. WILL: Object to the form of</p>	184	<p>1 week after February 27th, 2015?</p> <p>2 A I don't recall.</p> <p>3 Q Okay. How did -- so when does the</p> <p>4 legislation, when does the legislative session</p> <p>5 start and end in Georgia?</p> <p>6 A It starts on the second Monday in</p> <p>7 January, and when it ends, nobody knows. They</p> <p>8 set a calendar when they start the session to</p> <p>9 figure out -- well, they set part of the</p> <p>10 calendar, and they figure it out as they go.</p> <p>11 Q With respect to a regular session,</p> <p>12 at what point does -- do you know at what</p> <p>13 point there needs to be a bill in order for it</p> <p>14 to be considered in that session?</p> <p>15 A That varies every year.</p> <p>16 Q When you went, when you went ahead</p> <p>17 and created what you thought was the final</p> <p>18 plan, did you, did you show it -- who did you</p> <p>19 show it to?</p> <p>20 A The final plan that would have been</p> <p>21 whatever we were going to use in the</p> <p>22 legislation would only be a map that included</p> <p>23 the districts that were affected, so on this</p> <p>24 particular bill, it would be 17 districts on a</p> <p>25 map, a blank map of Georgia.</p>
183	<p>1 the question. You can answer.</p> <p>2 A Yes. But I would also say that, of</p> <p>3 those two precincts in this area, as I said</p> <p>4 before, to take out Stockbridge West, you</p> <p>5 would also have to take the precinct that is</p> <p>6 above it, which Representative Strickland</p> <p>7 actually won although it is a precinct in this</p> <p>8 area that is more diverse.</p> <p>9 Q Which precinct is that?</p> <p>10 A That would be Stagecoach.</p> <p>11 Q And is it correct that</p> <p>12 Representative Strickland won Stagecoach by 43</p> <p>13 votes but lost Stockbridge West by 945 votes?</p> <p>14 A That appears to be the numbers,</p> <p>15 yes.</p> <p>16 Q So going back to Exhibit 35, which</p> <p>17 is your email correspondence with</p> <p>18 Representative Rutledge, you responded to him</p> <p>19 saying that you expected that there could be a</p> <p>20 bill next week but you weren't a hundred</p> <p>21 percent sure.</p> <p>22 When -- do you recall when you</p> <p>23 finished the map for the entire House bill?</p> <p>24 A I don't recall.</p> <p>25 Q Do you recall whether it was the</p>	185	<p>1 I'm pretty sure at that point the</p> <p>2 only person I recall showing that to in its</p> <p>3 entirety was Chairman Nix.</p> <p>4 Q And would it be -- was, was this</p> <p>5 something that you showed him a hard copy of</p> <p>6 it? You -- he came to your office, or you</p> <p>7 went to his office? How does that work?</p> <p>8 A I don't recall. Could have been</p> <p>9 either. Could have been both.</p> <p>10 Q So in terms of actually working on</p> <p>11 a plan, is that something that you have to do</p> <p>12 in your office, or are you able to be mobile</p> <p>13 and to, for example, work on a laptop?</p> <p>14 A I have the capability of working</p> <p>15 remotely on my laptop.</p> <p>16 Q In 2015, do you recall, do you</p> <p>17 recall working remotely on this particular</p> <p>18 plan?</p> <p>19 A I don't recall doing that, no.</p> <p>20 Q Would it be fair to say that the</p> <p>21 majority of the time you tend to work on the</p> <p>22 plan in your office?</p> <p>23 A Yes.</p> <p>24 Q And in terms of working on the plan</p> <p>25 in your office, how many people are you able</p>

186	<p>1 to fit in the room that can be looking at the</p> <p>2 plan while you're working on it?</p> <p>3 A We have a conference room that</p> <p>4 would seat -- it's not as big as this. It</p> <p>5 probably -- it's held quite a few before, but</p> <p>6 I think there's maybe ten chairs in the room.</p> <p>7 Q All right. So with this -- when</p> <p>8 you show the plan to Chairman Nix, what you</p> <p>9 thought was a final plan, did Chairman Nix</p> <p>10 have any changes?</p> <p>11 A Not that I know of.</p> <p>12 Q Did he have any comments about it?</p> <p>13 A I don't recall. Members would meet</p> <p>14 with him throughout the process, if I worked</p> <p>15 on an area for a certain member. This</p> <p>16 particular legislative plan was left open for</p> <p>17 all members to participate in, so that was</p> <p>18 given to both, both parties, all 180 house</p> <p>19 members.</p> <p>20 So they would participate. They</p> <p>21 would come to see us on their own. If they</p> <p>22 wanted to draw something, then they were given</p> <p>23 the instruction to take whatever it is that</p> <p>24 they -- whenever they finalized what their</p> <p>25 portion would be, to take that to the chairman</p>	188	<p>1 THE VIDEOGRAPHER: We are now back</p> <p>2 on video record at 2:56 p.m. This is the</p> <p>3 beginning of file number four.</p> <p>4 Q All right. Great. So I'm going to</p> <p>5 ask you to go back into the GA documents, and</p> <p>6 page three and page four, I want you to pull</p> <p>7 those out.</p> <p>8 A This one?</p> <p>9 (Whereupon a document was identified as</p> <p>10 Plaintiff's Exhibit 37.)</p> <p>11 Q Yes. And then go ahead and staple</p> <p>12 that, and that will be Exhibit 37.</p> <p>13 And, Ms. Wright, who is Donna</p> <p>14 Yeomans?</p> <p>15 A She is the committee secretary in</p> <p>16 the Senate to -- at that time she was with</p> <p>17 Senator Crane.</p> <p>18 Q And in terms of the process in</p> <p>19 2015, did the bill go to the House first or to</p> <p>20 the Senate first?</p> <p>21 A The bill for the House districts --</p> <p>22 Q Yes.</p> <p>23 A -- started in the House.</p> <p>24 Q Okay. And so this, this email</p> <p>25 talks about the meeting for the Senate being</p>
187	<p>1 and show that to him.</p> <p>2 So he had had discussions with the</p> <p>3 other members on his own. I wasn't privy to</p> <p>4 those conversations. I would just get the,</p> <p>5 this is what they want and this is what they</p> <p>6 want to use, if that was what they decided</p> <p>7 upon.</p> <p>8 Q And would he ever communicate --</p> <p>9 how would he communicate with you? Would he</p> <p>10 ever communicate by email?</p> <p>11 A Who?</p> <p>12 Q Nix.</p> <p>13 A I don't recall very many emails</p> <p>14 with him. We would talk in person.</p> <p>15 Q And then would his -- to what</p> <p>16 extent would his staff be interacting with</p> <p>17 you?</p> <p>18 A Very little.</p> <p>19 MR. GREENBAUM: Okay. All</p> <p>20 right. Why don't we take a break since we're</p> <p>21 running out of tape.</p> <p>22 THE VIDEOGRAPHER: Going off video</p> <p>23 record at 2:46 p.m.</p> <p>24 (Proceedings in recess, 2:46 p.m. to</p> <p>25 2:56 p.m.)</p>	189	<p>1 on March 26th, 2015, so by then, the bill had</p> <p>2 already passed the House; correct?</p> <p>3 A Yes.</p> <p>4 Q So sometime between February 27th</p> <p>5 and March 26th, the bill was introduced into</p> <p>6 the House and was passed by the House;</p> <p>7 correct?</p> <p>8 A It's my recollection it passed the</p> <p>9 House on March 11th.</p> <p>10 Q March 11th?</p> <p>11 A That's my daughter's birthday.</p> <p>12 Q Okay.</p> <p>13 A Passed the House unanimously --</p> <p>14 Q Okay.</p> <p>15 A -- on my daughter's birthday.</p> <p>16 Otherwise, I would not remember that date.</p> <p>17 Q Totally understandable. And in the</p> <p>18 House, do you recall there being any hearings</p> <p>19 prior to the House passing the bill?</p> <p>20 A It was heard in committee just like</p> <p>21 any other bill.</p> <p>22 Q Do you -- did you attend a</p> <p>23 committee hearing on it?</p> <p>24 A Yes.</p> <p>25 Q Did you discuss the bill during</p>

190	<p>1 that committee hearing?</p> <p>2 A I did not make any comment during</p> <p>3 that hearing.</p> <p>4 Q And was there only one committee</p> <p>5 hearing in the House?</p> <p>6 A As far as I recall, there was one</p> <p>7 meeting for the House committee.</p> <p>8 Q How about in the Senate?</p> <p>9 A I believe there was only one</p> <p>10 meeting for the Senate committee as well.</p> <p>11 Q And you mentioned before it passed</p> <p>12 unanimously in the House. Was that true in</p> <p>13 the Senate too?</p> <p>14 A No, it was not.</p> <p>15 Q What was the vote in the Senate?</p> <p>16 A I don't recall specifically.</p> <p>17 Q How -- do you recall how it broke</p> <p>18 down on partisan lines?</p> <p>19 A I think it was a combination. I</p> <p>20 think most Republicans voted for it,</p> <p>21 maybe almost all of the Republicans voted for</p> <p>22 it. Some Democrats voted for it. Some voted</p> <p>23 against it. I believe there was one</p> <p>24 Republican -- I don't know. I better not</p> <p>25 speculate.</p>	192	<p>1 presented him the map, not the bill. He has</p> <p>2 to go and make the bill himself.</p> <p>3 (Whereupon a document was identified</p> <p>4 as Plaintiff's Exhibit 38.)</p> <p>5 Q Fair enough. All right. I want to</p> <p>6 mark as Exhibit 38, now you're going to be</p> <p>7 taking pages 26 and 27 out and stapling them.</p> <p>8 Ms. Wright, who's Steve Henson?</p> <p>9 A Steve Henson is a senator who is</p> <p>10 the Democratic leader in the Senate.</p> <p>11 Q And do you recall seeing this email</p> <p>12 prior to today?</p> <p>13 A I did see it prior to today, yes.</p> <p>14 Q When did you see it?</p> <p>15 A When we were compiling the</p> <p>16 information for your subpoena.</p> <p>17 Q During the course of the 2015</p> <p>18 redistricting plan, did you consult at all</p> <p>19 with Mr. O'Connor?</p> <p>20 A Can you ask that again?</p> <p>21 Q Yes. During the development of the</p> <p>22 redistricting plan that was passed in 2015,</p> <p>23 did you consult with Mr. O'Connor at all?</p> <p>24 A What do you mean by consult? I</p> <p>25 mean, I speak with him pretty much daily.</p>
191	<p>1 Q And -- strike that.</p> <p>2 Were there any changes from what</p> <p>3 you considered to be your final map when you</p> <p>4 presented it to Chairman Nix to the time in</p> <p>5 which it was enacted as law?</p> <p>6 A The very first version changed when</p> <p>7 the committee heard the bill. If I recall</p> <p>8 correctly, two districts were taken out, two</p> <p>9 were added in. There were two members who</p> <p>10 wanted to make a change kind of at the last</p> <p>11 minute.</p> <p>12 Those were added into the bill, and</p> <p>13 the other two, who had decided they just</p> <p>14 weren't going to worry with it, took theirs</p> <p>15 out. And that happened in the version that</p> <p>16 was passed in committee.</p> <p>17 Q In the House?</p> <p>18 A In the House committee.</p> <p>19 Q During the course of time were</p> <p>20 there any changes to Districts 105 and 111</p> <p>21 from the time you presented the plan to</p> <p>22 Chairman Nix to the time in which the bill was</p> <p>23 enacted into law?</p> <p>24 A Not that I recall.</p> <p>25 I'd like to clarify that I only</p>	193	<p>1 He's on my staff.</p> <p>2 Q Fair enough. What role, if any,</p> <p>3 did Mr. O'Connor play in the 2015</p> <p>4 redistricting plan?</p> <p>5 A I don't recall discussing the</p> <p>6 boundary lines or the proposed boundary lines</p> <p>7 with him.</p> <p>8 Q How about anything else with</p> <p>9 respect to the plan?</p> <p>10 A I don't recall.</p> <p>11 Q So you could have, you could have</p> <p>12 had discussions with him about the plan? You</p> <p>13 just don't remember one way or the other?</p> <p>14 A It's possible.</p> <p>15 Q Okay. Do you know why in, in this</p> <p>16 email Mr. O'Connor is sending Mr. Henson a</p> <p>17 combination of partisan electoral results and</p> <p>18 racial demographics of districts --</p> <p>19 District 105?</p> <p>20 A I would assume that the map</p> <p>21 being -- he asked for the map, and perhaps in</p> <p>22 conversation after delivering the map, he</p> <p>23 asked for additional information.</p> <p>24 Q Were you aware that with respect to</p> <p>25 District 105 that the black population of</p>

194	<p>1 District 105 decreased when it was, when it 2 was amended in 2015? 3 A Yes. 4 Q And were you aware that the 5 Hispanic population decreased? 6 A Yes. 7 Q Were you aware that in the pre-2015 8 version of 105 that President Obama had 9 received more votes than Mr. Romney? 10 A I may have known that then. I 11 don't recall now. 12 Q And were you aware that, within the 13 new 105, that Mr. Romney had received more 14 votes than Mr. Obama? 15 A Well, considering I was working 16 with the political mindset on redrawing these 17 districts, I'm sure I was using the 18 presidential data. So at the time of doing 19 this, I'm sure that I knew that. 20 Q Okay. And that would be true with 21 respect to all these elections, is that you 22 were aware of the political performance of the 23 pre-2015 105 versus the 105 that was enacted 24 in 2015? 25 A Yes. At that time, yes.</p>	196	<p>1 voters? 2 A Yes. We also have a field we use 3 that is a summary field. It's an average of 4 all statewide contested races. It's a 5 Republican and Democratic percentages that 6 gives us kind of an overall number. So that 7 would have been the main thing I was looking 8 at, that as well as the individual races. 9 But that overall number would kind 10 of give us a good picture because, obviously, 11 you see there's some spread between some of 12 the races, and that kind of gives you an 13 average. 14 Q And do you know how it is that that 15 overall number is calculated? 16 A I believe it's an average of all 17 the statewide contested races. 18 Q Would Mr. Strangia know more about 19 this than you? 20 A Probably. 21 Q Okay. Would Mr. O'Connor? 22 A No. 23 Q All right. And then the next 24 document -- which is going to be 38 or 39? 25 MR. POWERS: 39.</p>
195	<p>1 Q And would you also have been aware 2 of the decrease in black and Hispanic 3 percentage of total registered voters in 105 4 pre-'15 versus 105 -- strike that. 5 Were you, were you aware at the 6 time that the proposed 105 that was eventually 7 enacted had a lower percentage of black and 8 Hispanic voters than the pre-2015 105? 9 A I'm sure I was aware of that at 10 that time, yes. 11 Q And why are you sure that you would 12 have been aware of that? 13 A Well, I used a combination of all 14 of these factors when I work on a plan in that 15 pending changes box that I mentioned before, 16 so I'm sure that those would have been 17 somewhere on the box that at some point 18 through the process I would have gone to look 19 for. 20 Q And just to go back through what 21 those factors are, the factors would be a 22 combination of the racial demographics 23 according to the census, performance in 24 statewide partisan elections, and the 25 percentage of black and Hispanic registered</p>	197	<p>1 MR. WILL: 39. 2 (Whereupon a document was identified as 3 Plaintiff's Exhibit 39.) 4 Q 39. Using the numbers again at the 5 bottom of the page, GA 79 and 80. Can you 6 tell me what GA 79 and 80 is? 7 A This is an email of an article that 8 was forwarded to Representative Chandler, to 9 Chairman Nix, who copied -- forwarded it to 10 me. 11 Q Okay. And did you have any 12 response to this that you know of? 13 A I don't recall. 14 (Whereupon a document was identified as 15 Plaintiff's Exhibit 40.) 16 Q Then I want to move on to 17 Exhibit 40, which is going to be GA 100 to 18 101. 19 Ms. Wright, do you recognize this 20 document? 21 A Yes. 22 Q What is it? 23 A This is an email that was forwarded 24 to me or sent to me from Chairman Nix. 25 Q And what was the subject of the</p>

198	<p>1 email?</p> <p>2 A The chairman had been approached by</p> <p>3 a reporter. She asked about the process and</p> <p>4 House Bill 566 and the claim of the minority</p> <p>5 vote dilution. He was drafting a response and</p> <p>6 wanted my input as well as Spiro Amburn's.</p> <p>7 Q Did you have an understanding of</p> <p>8 what Senator Fort's position was?</p> <p>9 A I did not hear the news conference</p> <p>10 where he made whatever the claims that he made</p> <p>11 in that conference. I did have some</p> <p>12 conversation or was present for some</p> <p>13 conversations that he had during the process</p> <p>14 of the bill, which initially were not related</p> <p>15 to the districts in Henry County or Gwinnett</p> <p>16 County. They were primarily focused on two</p> <p>17 House districts in Atlanta.</p> <p>18 So I don't know what he said in</p> <p>19 that news conference, but I knew that he had,</p> <p>20 he had issue with the bill for his own</p> <p>21 reasons, and apparently that's what she was</p> <p>22 asking about for her report, so the chairman</p> <p>23 was just wanting to respond.</p> <p>24 Q Did you have an understanding that</p> <p>25 Senator Fort was concerned about the changes</p>	200	<p>1 Q So if I wanted to see for every</p> <p>2 city in Georgia what House, Senate, and</p> <p>3 Congressional districts they would be in, I</p> <p>4 could look at this document?</p> <p>5 A Yes.</p> <p>6 Q And this is a document that's</p> <p>7 prepared by your office?</p> <p>8 A Yes.</p> <p>9 (Whereupon a document was identified</p> <p>10 as Plaintiff's Exhibit 42.)</p> <p>11 Q All right. Ms. Wright, next</p> <p>12 exhibit -- here we go. Can you go to GA 95</p> <p>13 through 97? Do you recognize this email</p> <p>14 exchange?</p> <p>15 A Yes.</p> <p>16 Q What is it?</p> <p>17 A This is an email between myself and</p> <p>18 Linda Meggers related to the shape file for</p> <p>19 the new House districts so they could use</p> <p>20 that. She works with some of the local</p> <p>21 counties now, and she -- and Henry is one of</p> <p>22 the counties she works with. So they wanted</p> <p>23 to obtain the shape files so they could begin</p> <p>24 working on the voter -- changes to the voter</p> <p>25 lists.</p>
199	<p>1 that the bill made to District 105?</p> <p>2 A Initially, no, but later on it</p> <p>3 was -- he made statements and whatnot about</p> <p>4 that, so I heard about it later on.</p> <p>5 Q Now, when did, when did the bill</p> <p>6 pass the Senate?</p> <p>7 A I don't know the specific date. I</p> <p>8 believe it was the end of March.</p> <p>9 (Whereupon a document was identified</p> <p>10 as Plaintiff's Exhibit 41.)</p> <p>11 Q I'm going to mark as Exhibit 41,</p> <p>12 and I'm sorry that I do not have -- oh, wait.</p> <p>13 I have it right here. Georgia Cities By</p> <p>14 Legislative and Congressional District.</p> <p>15 MR. WILL: Is that a different one</p> <p>16 than we already put in?</p> <p>17 MR. GREENBAUM: Yes.</p> <p>18 Q Ms. Wright, do you recognize this</p> <p>19 document?</p> <p>20 A Yes.</p> <p>21 Q What is it?</p> <p>22 A This is a city report. Shows joint</p> <p>23 city report of all the House, Senate,</p> <p>24 Congressional districts by city. This was</p> <p>25 effective the 2017 session.</p>	201	<p>1 Q And did the governor sign the bill</p> <p>2 on May 13th -- or strike that.</p> <p>3 Yes. Did the governor sign the</p> <p>4 bill on May 13th?</p> <p>5 A I do not recall exactly what day he</p> <p>6 signed the bill.</p> <p>7 Q Okay. In looking at this document,</p> <p>8 does that refresh your recollection?</p> <p>9 A Okay. Yes.</p> <p>10 Q Do you recall that he signed it on</p> <p>11 May 13th?</p> <p>12 A I recall that I wrote it in this</p> <p>13 email that he signed it.</p> <p>14 Q Okay. And given that that was</p> <p>15 contemporaneous, do you feel pretty confident</p> <p>16 that that was the day that he actually signed</p> <p>17 it?</p> <p>18 A Hopefully, if I put it in an email.</p> <p>19 (Whereupon a document was identified as</p> <p>20 Plaintiff's Exhibit 43.)</p> <p>21 Q Okay. All right. I want to mark</p> <p>22 as Exhibit 43 a document entitled Georgia</p> <p>23 Districts 2015.</p> <p>24 Ms. Wright, do you recognize this</p> <p>25 document?</p>

202	<p>1 A Yes.</p> <p>2 Q What is it?</p> <p>3 A This is the current House district</p> <p>4 map packet.</p> <p>5 Q Well, if I wanted to see the basic</p> <p>6 district boundaries and basic demographics of</p> <p>7 this district -- of this plan, I could look at</p> <p>8 Exhibit 43?</p> <p>9 A Yes.</p> <p>10 MR. STRICKLAND: Wait a minute. Is</p> <p>11 that 40?</p> <p>12 MR. GREENBAUM: I think it's 43.</p> <p>13 MR. POWERS: 43.</p> <p>14 MR. STRICKLAND: What was 42?</p> <p>15 MR. GREENBAUM: 42 was GA 95</p> <p>16 through 97.</p> <p>17 MR. STRICKLAND: I must have gotten</p> <p>18 one off. I'll take your word for it.</p> <p>19 MR. GREENBAUM: It's hard to keep</p> <p>20 track.</p> <p>21 MR. STRICKLAND: Yeah. I must have</p> <p>22 gotten off one.</p> <p>23 (Whereupon a document was identified as</p> <p>24 Plaintiff's Exhibit 44.)</p> <p>25 Q I want to mark as Exhibit 44 GA 34</p>	204	<p>1 based on the 2010 census data and doubtless</p> <p>2 the percentage of the black population would</p> <p>3 be higher five years later with the rapid</p> <p>4 minority growth in Henry County. Do you agree</p> <p>5 with that statement?</p> <p>6 A Let me back up and read that just a</p> <p>7 second.</p> <p>8 I would say there is probably</p> <p>9 increases in those percentages, yes, based on</p> <p>10 the growth that we've discussed previously.</p> <p>11 Q And according to Mr. O'Connor,</p> <p>12 between April 1, 2010, and July of 2015 in</p> <p>13 Henry, more than 7,000 blacks were added to</p> <p>14 the voter roles while white registration</p> <p>15 declined by more than 3,000 voters. Is that</p> <p>16 consistent with your understanding of the</p> <p>17 data?</p> <p>18 A I have not analyzed that data, so</p> <p>19 that's his own statement.</p> <p>20 Q And is this the sort of thing that</p> <p>21 Mr. O'Connor does as part of his work for the</p> <p>22 office is to analyze the demographics and the</p> <p>23 registration data?</p> <p>24 A He does analyze some of the voter</p> <p>25 registration data and things along that line,</p>
203	<p>1 to 39. Ms. Wright, do you recognize this</p> <p>2 document?</p> <p>3 A Yes.</p> <p>4 Q What is it?</p> <p>5 A It's an email Dan O'Connor sent to</p> <p>6 Representative Knight.</p> <p>7 Q Okay. And do you know why</p> <p>8 Mr. O'Connor was emailing Representative</p> <p>9 Knight?</p> <p>10 A I believe Representative Knight had</p> <p>11 some questions about what the district, his</p> <p>12 new district, was going to be like with the</p> <p>13 new, the demographics and whatnot related.</p> <p>14 Q And is it your understanding he was</p> <p>15 interested not only in his district but the</p> <p>16 adjoining ones?</p> <p>17 A I assume so based on the content.</p> <p>18 Q And do you know why the, at the</p> <p>19 beginning, first set of data that Mr. O'Connor</p> <p>20 includes is the Percent Black New Map --</p> <p>21 A I do not --</p> <p>22 Q -- in that?</p> <p>23 A -- know that, no.</p> <p>24 Q Okay. Now, in the next paragraph,</p> <p>25 Mr. O'Connor talks about those figures being</p>	205	<p>1 but he often analyzes things of his own</p> <p>2 interest as well, so I don't know that -- he</p> <p>3 was not given an assignment to do that.</p> <p>4 Q Okay. Now, toward the bottom of</p> <p>5 the first page, he says, "There are few</p> <p>6 Democrats today serving the Georgia House from</p> <p>7 districts that are less than 40 percent black.</p> <p>8 In fact, only three Democrats represent House</p> <p>9 districts that are less than 20 percent</p> <p>10 black."</p> <p>11 Do you agree, disagree, or have no</p> <p>12 opinion of that statement?</p> <p>13 A I would trust that he was accurate</p> <p>14 when he said that. However, I do know that</p> <p>15 that has changed since then, since Taylor</p> <p>16 Bennett is no longer in that house, and that</p> <p>17 has seat went to a Republican.</p> <p>18 Q And what are the demographics of</p> <p>19 Taylor Bennett's seat?</p> <p>20 A I do not know.</p> <p>21 Q Is it -- oh, you mean in terms of</p> <p>22 those -- that --</p> <p>23 A Those three incumbents.</p> <p>24 Q Right. Okay. So as far as you</p> <p>25 know, there may only be two Democrats that</p>

206	<p>1 represent districts that are less than 20 2 percent black? 3 A Yeah. I mean, I don't know. 4 Without looking at it myself, I don't know. I 5 would trust that he's accurate, but I have not 6 studied that myself to say for certain. 7 Q Do you -- so let me focus on the 8 first part of that sentence and ask you 9 whether you agree, disagree, or have no 10 opinion of the statement. 11 "There are few Democrats today 12 serving the Georgia House from districts that 13 are less than 40 percent black." 14 A I don't know the answer to that 15 without looking at the data myself. 16 (Whereupon a document was identified as 17 Plaintiff's Exhibit 45.) 18 Q All right. And then I want to move 19 on to Exhibit 45, and that's going to be GA 30 20 to 33. Do you recognize Exhibit 45, 21 Ms. Wright? 22 A I have seen it before. 23 Q Okay. And this appears to be an 24 email the same day as Exhibit 44 between 25 Mr. O'Connor and Mr. Knight, I guess a little</p>	208	<p>1 MR. GREENBAUM: Okay. All right. 2 Bill Custer might have listened in for a while 3 today. 4 Q At the bottom of the first 5 paragraph, the last sentence talks about the 6 old version of 111 was almost a 50-50 split 7 between Romney and Obama in 2012 and that the 8 old district was a microcosm of Henry as a 9 whole. 10 Do you agree, disagree, or have no 11 opinion of that statement? 12 A I would say that's his opinion of 13 that. 14 Q Do you have -- do you agree with 15 that or disagree with that or have no opinion? 16 A I'd have to look at the data from 17 the election to verify that that is an 18 accurate description of the split. I believe 19 the race was close between Romney and Obama. 20 I don't know the numbers off the top of my 21 head. 22 Q Okay. 23 A And I think to say that it's a 24 microcosm of Henry as a whole is his opinion. 25 Q Okay. In the next paragraph, he</p>
207	<p>1 earlier in the day; is that correct? 2 A I would have to look at the other 3 one, but if you say it was earlier, I believe 4 you. 5 Q Yeah. Why don't you take a, why 6 don't you take a look just to confirm. I have 7 this email 10:39 a.m. whereas Exhibit 44 was 8 3:44 p.m. 9 A What number? 44? 10 Q Yes. It's the one that we just 11 did. 12 A Oh. Oh, okay. 13 Yeah, this appears to be earlier. 14 Q Okay. Now, in the second 15 paragraph -- or actually in the first 16 paragraph. 17 THE WITNESS: Is the light still 18 on? 19 MR. STRICKLAND: Aria, are you 20 still there? Hello? 21 MR. WILL: It's still live. It's 22 got the green light lit up. 23 MR. GREENBAUM: Yeah. 24 MR. STRICKLAND: Well, maybe we 25 have a mystery caller.</p>	209	<p>1 says, "Henry County today," referring to 2015, 2 "is about evenly divided between Democrats and 3 the GOP." 4 Do you agree, disagree, or have no 5 opinion of that statement? 6 A I'd have to look at the data to 7 tell you that. I don't know off the top of my 8 head exactly what the voter registration looks 9 like. 10 Q Okay. 11 A And we wouldn't know really because 12 voter registration is not by party, so we 13 would have to look at data from the last 14 election cycle. 15 Q Okay. And then halfway through 16 that second paragraph, it says, "Between 2004 17 and 2014, white registration totals in the 18 county stayed about the same while black voter 19 registration increased by 26 percent -- or 20 26,000." 21 Do you agree, disagree, or have no 22 opinion of that statement? 23 A Again, these are his, his analysis. 24 So I would have to look at it myself to form 25 my own. I trust that he's accurate. Since he</p>

210	<p>1 works for me, I hope he's accurate. But</p> <p>2 without having looked at it myself, I'm not</p> <p>3 going to say, not that they don't ever make</p> <p>4 mistakes.</p> <p>5 Q So he then says he suspects a lot</p> <p>6 of Clayton residents have moved to Henry</p> <p>7 County between 2004 and 2014. Do you agree,</p> <p>8 disagree, or have no opinion of that</p> <p>9 statement?</p> <p>10 A That's his opinion. I'm not -- I</p> <p>11 don't feel like I'm in a position to say what</p> <p>12 that is without looking at that deeper.</p> <p>13 Q And how would you describe his --</p> <p>14 what his role is as the data analyst within,</p> <p>15 within your office?</p> <p>16 A Dan is unique in his ability to</p> <p>17 retain information. He is a data junkie. He</p> <p>18 likes numbers. He likes history. He likes</p> <p>19 geography. He likes all of these types of</p> <p>20 things and how election results, he can quote</p> <p>21 back results of elections, I mean,</p> <p>22 presidential races, from before I was born.</p> <p>23 And this is just Dan and who he is. He's a</p> <p>24 unique individual.</p> <p>25 His role, I mean, he fills a lot of</p>	212	<p>1 Q We're going to look at them both</p> <p>2 together so that we can understand the</p> <p>3 interrelationships between the two of them.</p> <p>4 And then I'm also going to mark, this is 46.</p> <p>5 This is a data analysis that we had done</p> <p>6 regarding the precinct demographics for 2015.</p> <p>7 MR. WILL: This is a document</p> <p>8 compiled by y'all?</p> <p>9 MR. GREENBAUM: Yes.</p> <p>10 Q So one of the things that I'd like</p> <p>11 to try to break down at a precinct level is</p> <p>12 what sort of changes were made in District 105</p> <p>13 between 2012 and 2015.</p> <p>14 So let's start with precincts that</p> <p>15 were either reduced or taken away in</p> <p>16 District 105 in 2015. Could you, could you</p> <p>17 explain what districts either were removed</p> <p>18 from the district or reduced in 2015?</p> <p>19 A 105, Lawrenceville M precinct was</p> <p>20 split, so I was able to put that precinct back</p> <p>21 together and make it whole into 104. And</p> <p>22 that's all.</p> <p>23 Q So Lawrenceville, there was a</p> <p>24 portion of the precinct in 2012 that was part</p> <p>25 of 105?</p>
211	<p>1 roles on the staff. He does a lot of map</p> <p>2 requests and information requests from members</p> <p>3 and anyone else, basically just printing off</p> <p>4 maps as well as compiling data and</p> <p>5 information.</p> <p>6 I didn't know about these requests</p> <p>7 for information nor had I seen them until you</p> <p>8 asked for the emails and the subpoena, so I</p> <p>9 did not know that this information was what he</p> <p>10 was giving out. He didn't discuss it with me.</p> <p>11 But Dan does a lot of, of study of</p> <p>12 those numbers and all election returns and</p> <p>13 results and things like that of that nature.</p> <p>14 And a lot of the members like to pick his</p> <p>15 brain about things like that because he is</p> <p>16 that, that unique in his ability.</p> <p>17 Q Okay. Thank you. I want to move</p> <p>18 on and look at some of the changes to the</p> <p>19 plans in 105 and 111 in 2015. And why don't</p> <p>20 we start, why don't we start with 105, so</p> <p>21 maybe we can try to break out the big maps and</p> <p>22 take a look.</p> <p>23 A You want the '12 or just the '15?</p> <p>24 (Whereupon a document was identified</p> <p>25 as Plaintiff's Exhibit 46.)</p>	213	<p>1 A Right.</p> <p>2 Q And the whole precinct was moved</p> <p>3 into 104 in 2015; is that correct?</p> <p>4 A Yes. You're looking at this area</p> <p>5 here, blue, gray, that's all one precinct.</p> <p>6 Q Okay.</p> <p>7 A Gray added to blue. Put the</p> <p>8 precinct back together.</p> <p>9 Q And did you look at all of either</p> <p>10 partisan performance or racial demographics</p> <p>11 that, that would be caused by moving a portion</p> <p>12 of Lawrenceville precinct M?</p> <p>13 A Well, I'm not sure I went at it</p> <p>14 that way. I think I went more in the</p> <p>15 direction of to add first and try to increase</p> <p>16 that percent total Republican number I told</p> <p>17 you about the average number --</p> <p>18 Q Okay.</p> <p>19 A -- as well as some of the races.</p> <p>20 So in looking to do that first, that was</p> <p>21 where, you know, working from there and then</p> <p>22 moving in the opposite direction to try and</p> <p>23 bring down the population, and to put a</p> <p>24 precinct back together would be an easy way to</p> <p>25 do that as well as keeping that precinct --</p>

214	<p>1 making that precinct whole again, which is 2 also a good thing to do. 3 Q All right. So let's see, let's see 4 what you added in, right, that you added in a 5 full precinct Harbins C? 6 A Uh-huh (affirmative). 7 Q And then you split precinct Harbins 8 A which had primarily just been part of 104? 9 A Right. This area as you come out 10 here is much more still more of a rural area, 11 votes very, very Republican. It's a small, 12 skinny precinct here, Harbins C. So we took 13 Harbins C, and we used a major road to cut 14 through there, a good dividing line to cut 15 through Harbins A, which is a larger precinct 16 geographically. 17 And there's -- that was an increase 18 in Republican votes because of the area here 19 and who -- the voters in this area. So adding 20 that in brought it up in terms of Republican 21 number up some, so the only other thing -- 22 Q Can we start -- can we -- I just 23 want to talk about Harbins C for a second 24 before you move on to any other precincts. 25 A Okay.</p>	216	<p>1 is more straight making this area more compact 2 rather than the shape of this precinct, which 3 is not a very compact precinct. 4 Q Now, did you know with respect to 5 Harbins C -- wait. Which is the one that's 6 split? It's Harbins -- 7 A A. 8 Q Did you know that with respect to 9 Harbins A what the partisan performance was in 10 the portion that went into 105 as opposed to 11 what was left in 104? 12 A Say that one more time? 13 Q For example, did you know that, 14 with respect to Harbins A, did you -- could 15 you project whether the portion that you added 16 to 105 performed better for Republicans than 17 the portion of the precinct that you left at 18 104? 19 A I didn't look at it that way. The 20 objective being, if you're taking this in, it 21 would be to smooth this across here and make 22 that more compact. It would be 23 counterproductive to take in a precinct that 24 looks like this and then come across the top 25 and whack out a piece there. That doesn't</p>
215	<p>1 Q You mentioned the Republican 2 numbers. It's also a heavily white precinct; 3 correct? 4 A Yeah, I guess so, if you say so. 5 Q Do you know otherwise? 6 A I don't know otherwise, but I 7 couldn't tell you what the breakdown is right 8 now. 9 Q Okay. Would you be surprised that, 10 according to the 2010 census data, it's about 11 11 percent black? 12 A No, I guess. I don't know. 13 Q All right. And then the other 14 thing that you did in terms of adding was you 15 put a portion of Harbins A into District 105; 16 correct? 17 A Yes. 18 Q And you mentioned I believe -- I'll 19 let you go ahead and explain that. 20 A Well, part of the precinct line 21 comes across here as well, so to make that 22 line a good, straight boundary line, it's a 23 road that cuts through here that is a known 24 road that divides through here, made sense to 25 use that to come across here so that your line</p>	217	<p>1 make sense, so you wouldn't do it that way. 2 Q Would you dispute that with respect 3 to Harbins A, and you can look at Exhibit 46 4 as a reference, that the portion of the 5 precinct that you added to 105 is -- has a 6 much lower black percentage than the portion 7 of the precinct that you left in 104? 8 A I would not know that. I didn't 9 look at that that way. 10 Q Okay. But as, but as you were 11 actually making these changes to the map, you 12 could have seen, for example, if you had up 13 there what the demographics were of the 14 district as you, as you made those changes, 15 you would have been able to see that it was 16 reducing black population to move that portion 17 of Harbins A into 105? 18 A The way that I work with the 19 pending change box is to see the impact it's 20 having as a whole. So in order to do what 21 you're doing, I would have had to have gone to 22 an extra effort to hunt up for that 23 information, which I did not do. 24 Q But you'd see it as a whole if, for 25 example, that portion of Harbins A had a lower</p>

218	<p>1 black percentage than the rest of the plan?</p> <p>2 A I'm not sure --</p> <p>3 Q Okay.</p> <p>4 A -- I'm following that.</p> <p>5 Q So, you know, according to our</p> <p>6 data, the portion of Harbins A that you moved</p> <p>7 into District 105 is less than 15 percent</p> <p>8 black voting age population.</p> <p>9 A Okay. That's your -- what you're</p> <p>10 saying, I mean --</p> <p>11 Q What I'm saying is that we agree</p> <p>12 that, we agree that 105 in terms of black</p> <p>13 voting age population is roughly about 35</p> <p>14 percent black; correct?</p> <p>15 A Totally -- I'm sorry. My brain</p> <p>16 kind of went out on that. Say it again?</p> <p>17 Q That's fine. With respect to</p> <p>18 Harbins -- okay. Strike that.</p> <p>19 With respect to the plan as a whole</p> <p>20 in 105, is it your understanding that that</p> <p>21 district is roughly within a few percentage</p> <p>22 points 35 percent black voting age population?</p> <p>23 A At what point? Before or after --</p> <p>24 Q Both.</p> <p>25 A -- making changes? I think it was</p>	220	<p>1 that she has that were still split.</p> <p>2 That was why I could easily put</p> <p>3 Lawrenceville M back together, make sure, you</p> <p>4 know, that's an entire precinct given back to</p> <p>5 them, no ballot combination there.</p> <p>6 And then I actually added some in</p> <p>7 in Lawrenceville D to her district to then</p> <p>8 complete a balancing of population. And it</p> <p>9 was at that point that I would then go back</p> <p>10 and see, if I did these changes, what impact</p> <p>11 did that then have on the overall percent</p> <p>12 total black, Hispanic, and whatnot.</p> <p>13 So I wasn't doing it block by block</p> <p>14 to go along and say, oh, well, there's this</p> <p>15 much here and, oh, there's that much there.</p> <p>16 That was not the way that I did this. That's</p> <p>17 not the way I would ever do it.</p> <p>18 I'm looking at what was my overall</p> <p>19 objective? Can I achieve that? Then can I</p> <p>20 balance it? And then what is the numerical</p> <p>21 result of that after that is done?</p> <p>22 Q Okay. Now, District 105 pre-2015,</p> <p>23 we went over the number of precincts that were</p> <p>24 split. Am I correct that what happened in</p> <p>25 2015 was you created a split precinct that</p>
219	<p>1 less than that or --</p> <p>2 Q I think it went from 34 to 31. We</p> <p>3 can --</p> <p>4 A Something in that range.</p> <p>5 Q We can go back and look at --</p> <p>6 A Right.</p> <p>7 Q -- look at O'Connor's email because</p> <p>8 it actually has that data in it.</p> <p>9 A To clarify, my objective was to see</p> <p>10 if I could find political improvement in the</p> <p>11 Republican number for her district. So I'm</p> <p>12 going about this in a way of knowing that,</p> <p>13 let's see if we -- the Republican area here,</p> <p>14 try and see if that boosts the district.</p> <p>15 If that boosted the district,</p> <p>16 what my next objective would be is to find a</p> <p>17 way to balance that population out, how would</p> <p>18 I get that -- to improve and take this area in</p> <p>19 to boost her political number, what would I</p> <p>20 then take out?</p> <p>21 And, obviously, the places where I</p> <p>22 had split precincts would be my first choice</p> <p>23 to go because I don't want to split an</p> <p>24 additional precinct. So that made it the</p> <p>25 obvious choice to look at the two precincts</p>	221	<p>1 didn't exist before?</p> <p>2 A Correct.</p> <p>3 Q And you reduced a precinct split by</p> <p>4 taking part of one of the Lawrenceville</p> <p>5 districts that had been split and putting all</p> <p>6 of that into 104?</p> <p>7 A I think what you're saying is I</p> <p>8 split one and put one back together and</p> <p>9 changed the split on another one, and that</p> <p>10 would be right.</p> <p>11 Q Yes. So that if, if somebody asks</p> <p>12 you how many precincts were split in 105 in</p> <p>13 2012 and how many precincts that were split in</p> <p>14 105 in 2015, it would be the same number?</p> <p>15 A Yes.</p> <p>16 Q Thanks. All right. Let's, let's</p> <p>17 move on to the Henry County plan.</p> <p>18 Go off the record for a moment.</p> <p>19 THE VIDEOGRAPHER: Going off record</p> <p>20 at 3:44 p.m.</p> <p>21 (Proceedings in recess, 3:44 p.m. to</p> <p>22 3:55 p.m.)</p> <p>23 THE VIDEOGRAPHER: We are now back</p> <p>24 on video record at 3:55 p.m. This is the</p> <p>25 beginning of file number five.</p>

222	<p>1 Q So, Ms. Wright, if my recollection 2 is correct, when we were talking about the 3 Henry District 111 2012 plan, that had four 4 split precincts: Grove Park, Unity Grove, 5 North Hampton, and McDonough Central? 6 A I believe, yeah, the Unity Grove 7 and the Grove Park, Park issue was that city 8 limit thing that's not an intentional split. 9 I think that line had changed. But, yes, 10 McDonough Central and North Hampton were the 11 splits. 12 Q And let me see. North Hampton, 13 McDonough Central, and Unity Grove, and Grove 14 Park, it was just a matter of -- 15 A I think the initial -- 16 Q -- lines? 17 A -- VTD line, it wasn't a split. 18 Q Okay. 19 A But it may appear to be a split now 20 because of the way -- 21 Q Okay. 22 A -- the line falls with the 23 geography on the -- with the county. 24 Q So there were, there were two split 25 precincts basically?</p>	224	<p>1 started. 2 A The same process was for both these 3 districts because the objective was to try and 4 politically help the incumbent for purposes of 5 reelection. So looking at areas that were 6 potentially areas that might help his 7 Republican overall number go up a little bit 8 as well as the fact that -- actually, I think 9 on 105, both of them, the incumbent both, 10 since there was no incumbent when we initially 11 drew the district, both of the incumbents 12 lived pretty far away. For instance, he lived 13 way down here. So knowing where -- 14 Q When you say "down here," just for 15 the purposes of the record -- 16 A Sure. 17 Q -- can you describe it? 18 A He lived in the Lowes, near the 19 southwest portion of the Lowes precinct, the 20 bottom of the district. So for him as well as 21 the political aspect was the driveability and 22 the representability of the district being 23 closer to where he is down here from up here, 24 whereas the incumbent in 109 at the time, I 25 believe, lived in the Lake Haven precinct.</p>
223	<p>1 A Right. There were two precincts 2 that were split for a size population. 3 Q Okay. So now let's look at all the 4 changes that were made between the 2012 and 5 2015 plan, and if you could talk about the 6 process that you went through in terms of 7 making those changes. 8 A I'm just going to -- 9 Q Why don't we, why don't we keep 10 this -- 11 A -- kind of throw it somewhere. I 12 don't know. 13 Q I don't know if we can put it -- 14 MR. WILL: Underneath? 15 Q -- underneath? We might actually 16 want to reference it at some point. I don't 17 know. 18 A I'm not sure. I was going to kind 19 of fold some of that in. I don't need that 20 whole side. You can leave it so I can easily 21 get to the purple. 22 MR. WILL: Well, I know how you are 23 about folding. I wasn't sure if we could do 24 that. 25 Q So can you talk about where you</p>	225	<p>1 So keeping those factors in mind 2 and knowing where those incumbents lived as 3 well as looking for what precincts would 4 impact the political numbers and, as we talked 5 about, knowing that the Stockbridge area, the 6 demographics of the Stockbridge area in the 7 northern part of the county, my initial 8 thought was to try and do something to change 9 those precincts for Representative Strickland. 10 Q Because it would make the, it would 11 make the -- it would perform better if you 12 took those precincts out for Representative 13 Strickland; correct? 14 A That's correct, yes, it would. 15 That was the hope and the objective. So in 16 taking those out, I believe the Flippen 17 precinct had a good bit of population in it. 18 I trying to think, did he have 19 that -- I don't think he had -- yeah, he did 20 not have that before. So that was one area 21 and to counterbalance with these precincts to 22 bring it into this area here as well. 23 And I think that portion of -- 24 yeah, that portion of Hickory Flat on this 25 side of Highway 42, Highway 42 is a good</p>

226	<p>1 dividing line through there, so that was why</p> <p>2 that portion of Hickory Flat was also included</p> <p>3 with Flippen to offset some of the population</p> <p>4 figures here as we balance that out.</p> <p>5 I don't particularly recall the</p> <p>6 political demographics of this area, but if I</p> <p>7 was to wager a guess, I'd say that it's</p> <p>8 probably kind of close in terms of the</p> <p>9 political breakdown. I don't know that right</p> <p>10 now off the top of my head. You'd have to</p> <p>11 look at your --</p> <p>12 Q Okay.</p> <p>13 A -- all your stuff.</p> <p>14 Q Okay.</p> <p>15 A As I'm doing that, I'm looking at</p> <p>16 it as I go.</p> <p>17 Q So can we talk about, can we talk</p> <p>18 about that a little bit more for a second?</p> <p>19 A Sure.</p> <p>20 Q So just to be clear in terms of</p> <p>21 that part of the county, you removed</p> <p>22 Stagecoach and Stockbridge West from the plan;</p> <p>23 correct?</p> <p>24 A Yes.</p> <p>25 Q And then you added Flippen or a</p>	228	<p>1 Q Okay.</p> <p>2 A So then as also through here, he</p> <p>3 had portions of McDonough Central previously.</p> <p>4 If I recall, I believe Representative Rutledge</p> <p>5 was interested -- I think he had part of</p> <p>6 McDonough Central before -- no, actually he</p> <p>7 did not. That was Representative Welch's.</p> <p>8 But he was interested in</p> <p>9 representing a portion of that precinct, so he</p> <p>10 picked up that precinct. And by keeping this</p> <p>11 portion with Representative Strickland, it's</p> <p>12 still contiguous to the McDonough precinct,</p> <p>13 which he picked up in its entirety and moved</p> <p>14 in to 111. That was from Representative</p> <p>15 Welch's district previously, the McDonough</p> <p>16 precinct was, as a whole.</p> <p>17 Q Okay.</p> <p>18 A And then let's see. The changes</p> <p>19 around Hampton and Mt. Carmel were population</p> <p>20 related, I think, to balance out the numbers</p> <p>21 that we were picking up once we moved into the</p> <p>22 McDonough area.</p> <p>23 Obviously, if you're picking up,</p> <p>24 you've got to take out, so you're going to</p> <p>25 look for where can you take precincts out that</p>
227	<p>1 portion of Flippen?</p> <p>2 A Portions of Flippen, uh-huh</p> <p>3 (affirmative).</p> <p>4 Q And a portion of Hickory Flat;</p> <p>5 correct?</p> <p>6 A That's correct. 109 actually</p> <p>7 had -- in order for it to be contiguous for</p> <p>8 109 to take those precincts, obviously, all of</p> <p>9 Flippen could not move. If it moved, it would</p> <p>10 make it noncontiguous, so I couldn't do that.</p> <p>11 But this is the railroad, and this</p> <p>12 is over to Highway 42, which are significant</p> <p>13 lines and recognizable lines to define those</p> <p>14 boundaries. But that would enable 109 to be</p> <p>15 able to take those areas, which would</p> <p>16 politically help 111.</p> <p>17 Q Did you realize in doing this that</p> <p>18 the portion of Hickory Flat that you put into</p> <p>19 111 has a much lower minority population</p> <p>20 percentage than the district -- the portion of</p> <p>21 it that remained in 109?</p> <p>22 A I did not, but I wouldn't have</p> <p>23 looked at that because I couldn't take any</p> <p>24 other portions of Hickory Flat and the</p> <p>25 districts still be contiguous.</p>	229	<p>1 were either not as beneficial to his T-rep</p> <p>2 number or that would be -- and also be enough</p> <p>3 population to help balance that out.</p> <p>4 So by looking around the edges of</p> <p>5 what, what's there, these precincts, if I</p> <p>6 recall, Unity Grove he had before. Unity</p> <p>7 Grove was a good precinct for him politically,</p> <p>8 so it wasn't beneficial to take that away from</p> <p>9 him. Adding in a little bit of the Tussahaw</p> <p>10 precinct, which also performs pretty strongly</p> <p>11 Republican, was beneficial to his T-rep</p> <p>12 number.</p> <p>13 And then looking for a place to</p> <p>14 take away from, to balance that out and</p> <p>15 actually, you know, get the numbers in line,</p> <p>16 that was why we put this precinct back</p> <p>17 together in North Hampton because, again, if I</p> <p>18 can put one back, I try to put one back and</p> <p>19 not leave a split.</p> <p>20 Of course, then that still wasn't</p> <p>21 enough population to balance it, so I could</p> <p>22 either have cut in Oakland or cut in</p> <p>23 Mt. Carmel, and the boundary lines here,</p> <p>24 there's a large neighborhood and a large -- a</p> <p>25 good road here that's a recognizable road, so</p>

230	<p>1 that made the better split there to get the 2 balance right. 3 Q So is it fair to say that the 4 Tussahaw -- have I said that correctly? 5 A Tussahaw, uh-huh (affirmative). 6 Q -- Tussahaw precinct is not only 7 predominantly Republican but predominantly 8 white? 9 A If you say so. I couldn't tell you 10 that. I don't know the demographics of every 11 precinct. 12 Q Now, taking a look, we said that 13 with respect to District 111 that there were 14 two precinct splits in the 2012 plan; correct? 15 A Correct. 16 Q Now, for 2015, are we -- is there 17 five split precincts? 18 A There would be one -- five, yes. 19 Q Okay. So you went from two split 20 precincts to five split precincts? 21 A That appears to be correct. 22 Q And do you know of any other 23 legislative districts in the plan that have 24 five split precincts? 25 A Oh, I'm sure there are some, but I</p>	232	<p>1 have -- 2 Q Sure. 3 A -- a way to really give an accurate 4 representation of it once he get several years 5 away from that VTD report. 6 Q I was -- so going back to, going 7 back to 2011, one of the documents we went 8 through earlier was a report from -- that 9 Maptitude generated regarding the total number 10 of precinct splits in the entire plan. And 11 back then, that would have -- back then it 12 would have closely adhered to, because it was 13 so close in time to the census, right -- 14 A Right. 15 Q -- to the number of split 16 precincts? 17 A Sure. 18 Q And, if anything, it probably would 19 have overstated the number of split precincts 20 since there are some cases where there were 21 changes after the -- after you had sent the 22 census information for the VTDs between that 23 period of time -- between that period of time 24 and when you actually redistricted in 2011? 25 A I think I followed that.</p>
231	<p>1 couldn't tell you which ones. On the whole 2 House plan? 3 Q Uh-huh (affirmative.) 4 A Yeah, I'm sure there are some. 5 Q Now, I think I recall that, from 6 one of the earlier documents, it reported how 7 many precinct splits there were in the plan as 8 a whole, and there was something like 150 9 split precincts? 10 A I don't know. I'd have to go back 11 and look. 12 Q But it would be consistent with 13 whatever was in that report that Maptitude 14 performed; correct? 15 A Right. But that, that report then 16 would have been referring to the VTDs, which 17 would have been five years previous, so 18 counties throughout the state who have had 19 changes to their precincts -- 20 And some counties do actually make 21 changes to their precinct to reduce the splits 22 that a districting might cause, so it might 23 show up as a split now on a VTD report but the 24 county has made changes so that that's no 25 longer a split VTD any longer. So I don't</p>	233	<p>1 Yeah. Right. If the county's made 2 changes to their precincts which they -- some 3 did from 2010 moving forward, then those would 4 not be reflected in the report in terms of the 5 number of VTDs splits. 6 Q But what you were trying to do in 7 2011 was, where, where there was a change in a 8 precinct after the VTD was created, adhere to 9 what the existing precinct line was more than 10 what the VTD told you? 11 A Well, a county could do one of two 12 things. They could actually try to reduce 13 the -- reduce their splits by combining the 14 precinct or I guess they could do the 15 opposite. They could actually adjust the 16 split in such a way so it's now aligning with 17 it there. I mean, they do different things. 18 Depends on the county. 19 Q You know, one of the things I 20 forgot to ask you about with respect, and you 21 might not know the answer to this, but with 22 respect to District 105, there's, there's one 23 precinct, Baycreek G, that has one census 24 block within 105 and the entire rest -- 25 A I know what you're talking about.</p>

234	<p>1 Q -- the entire rest of the precinct 2 is in 114. 3 A It's a geographical error with the 4 census block and the county. We can't make 5 our precinct line match it because they put 6 the precinct boundary on a feature that's not 7 a block. 8 MR. STRICKLAND: Hold on a second, 9 Jon. Sorry. 10 THE VIDEOGRAPHER: Go off the 11 record? 12 MR. POWERS: Sure. 13 THE VIDEOGRAPHER: Going off video 14 record at 4:08 p.m. 15 (Whereupon off-the-record discussions 16 ensued.) 17 THE VIDEOGRAPHER: Back on video 18 record. 19 MR. CUSTER: Hey, Frank, Bill. 20 MR. STRICKLAND: Hey, Bill. Sorry 21 to be delayed calling in. 22 MR. CUSTER: You all still having a 23 party there? 24 MR. STRICKLAND: Yes, we are. Come 25 on over.</p>	236	<p>1 MR. STRICKLAND: Pages 1 and 2? 2 MR. GREENBAUM: Pages 1 and 2, the 3 first two. 4 MR. STRICKLAND: We must have 5 pulled those off. 6 MR. GREENBAUM: It's right in front 7 of you. 8 MR. STRICKLAND: Oh, yeah, I see. 9 Got it. 10 Q All right. So this is 47. And 11 take a look at it, Ms. Wright. My first 12 question for you will be: Do you recognize 13 this document? 14 A I recognize it. I've seen it 15 before. 16 Q Do you know what the document is? 17 A It is a summary of what was done, I 18 believe, in House Bill 56 -- or 566. 19 Q Okay. Were you involved at all in 20 the creation of this document? 21 A No. 22 Q Did you review it prior to it being 23 released? 24 A No. 25 Q Now, I want to call your attention</p>
235	<p>1 MR. CUSTER: Well, you know, I 2 appreciate it, but I'm just not fit to be seen 3 outside of my home today. 4 MR. STRICKLAND: All right. We'll 5 let you keep your distance. 6 Q All right. Oh, we're on the 7 record? 8 A You're on. 9 Q Okay. Sorry about that. 10 I want to move to introduce -- mark 11 another document. Why don't we, why don't we 12 put the maps all on the bottom for now. I 13 might get back to them, and I might not. 14 A All on the floor? 15 Q Either on the floor or on the 16 table, whatever works better for you. 17 MR. WILL: Put them out of the way. 18 MR. GREENBAUM: Okay. 19 (Whereupon a document was identified 20 as Plaintiff's Exhibit 47.) 21 Q I now want to, your pile of 22 documents, not that pile -- 23 A I'll stick that back out of the way 24 Q -- but the GA, the GA pile. So I 25 want to mark as 47 GA 1 and 2.</p>	237	<p>1 to the last bullet point, which is on page 2 two. And it talks about the district line 3 changes that are being made for a variety of 4 reasons, and in looking -- 5 And it gives three reasons: 6 eliminating split precinct, reuniting a 7 neighborhood or a community of interest, or 8 addressing a technical -- or addressing 9 technical concerns. 10 With respect to 105, it did 11 eliminate a split precinct, but it also 12 created a new split precinct; correct? 13 A Yes. 14 Q And with respect to 111, it 15 actually added split precincts from two to 16 five; correct? 17 A Yes. 18 Q Now, with respect to 105 or 111, 19 was there any instance of a reuniting a 20 neighborhood or community of interest? 21 A I'm not aware. 22 Q And then with respect to 105 and 23 111, was the main purpose to address technical 24 concerns? 25 A Depends on what you define as a</p>

238	<p>1 technical concern.</p> <p>2 Q Well, what do you define as a</p> <p>3 technical concern?</p> <p>4 A Well, I would offer that I don't</p> <p>5 believe this is the entire, comprehensive list</p> <p>6 of reasons why you might make a district</p> <p>7 change. But I would define a technical</p> <p>8 concern as maybe you've got a, a potential</p> <p>9 voter anonymity issue because of the way that</p> <p>10 a precinct was split, or you find a mistake in</p> <p>11 terms of trying to align to a precinct line or</p> <p>12 a city line or something that your objective</p> <p>13 was that was causing a problem for the county</p> <p>14 elections office in terms of their work.</p> <p>15 Those would be what I would define as a</p> <p>16 technical concern.</p> <p>17 A noncontiguous piece is usually</p> <p>18 covered in the language, but it might be</p> <p>19 something you would want to correct just for</p> <p>20 the sake of the block assignment report. So</p> <p>21 those are the kind of things that I would</p> <p>22 think of as a technical concern.</p> <p>23 Q And that doesn't really apply -- I</p> <p>24 understand that there might have been a couple</p> <p>25 of areas where you made precincts whole that</p>	240	<p>1 or it may be the caucus chairman. One or the</p> <p>2 other.</p> <p>3 Q Okay. And Mr. Harvill-Childs in</p> <p>4 his email, which is the, on the next page,</p> <p>5 second page, in the first paragraph, he</p> <p>6 mentions a Gerald. Do you know who Gerald is?</p> <p>7 A I don't know.</p> <p>8 Q Okay. And in the second paragraph,</p> <p>9 he mentions Spiro.</p> <p>10 A Spiro.</p> <p>11 Q Spiro. I'll eventually get that</p> <p>12 right. And Spiro is -- can you remind me who</p> <p>13 Spiro is?</p> <p>14 A He's the chief of staff to the</p> <p>15 speaker.</p> <p>16 Q Okay. So he says that Spiro has</p> <p>17 deputized him to oversee a project for the</p> <p>18 2017 session and that he'd like for him and</p> <p>19 Mr. Harvill-Childs and Mr. O'Connor to meet to</p> <p>20 talk about redistricting in 2017; correct?</p> <p>21 A It's on the email.</p> <p>22 Q Okay. Were you aware of this at</p> <p>23 the time?</p> <p>24 A No, I was not.</p> <p>25 Q And the email also references</p>
239	<p>1 were small pieces of 111, but technical</p> <p>2 concerns didn't drive the changes to 111 --</p> <p>3 A No.</p> <p>4 Q -- did they?</p> <p>5 A No.</p> <p>6 (Whereupon a document was identified</p> <p>7 as Plaintiff's Exhibit 48.)</p> <p>8 Q Okay. All right. Back to the GA</p> <p>9 documents. And I want to go to GA-6 through 8</p> <p>10 and mark that as Exhibit 48.</p> <p>11 Ms. Wright, when were you first</p> <p>12 aware that there was consideration of</p> <p>13 redistricting again in the 2017 legislative</p> <p>14 session?</p> <p>15 A I'm not sure when the specific date</p> <p>16 would have been.</p> <p>17 Q Do you recognize Exhibit 48?</p> <p>18 A I've seen it.</p> <p>19 Q Okay. And this -- there are two --</p> <p>20 it consists of two emails from the morning of</p> <p>21 December 14th, 2006 [sic]; correct?</p> <p>22 A Yes.</p> <p>23 Q And who is Caulder Harvill-Childs,</p> <p>24 A He is a staff person who works for</p> <p>25 the majority leader in the house, I believe,</p>	241	<p>1 making recommendations for Cobb, Gwinnett,</p> <p>2 Henry County, referencing Representative</p> <p>3 Strickland's district, and one other district</p> <p>4 I can't pronounce that name. Chokis?</p> <p>5 A Chokis.</p> <p>6 Q Chokis. Generally the</p> <p>7 battlegrounds we always deal with.</p> <p>8 Were you aware that Mr. O'Connor</p> <p>9 had been tasked to make recommendations for</p> <p>10 these areas?</p> <p>11 A He was not tasked by me, so, no, I</p> <p>12 was not aware of that.</p> <p>13 (Whereupon a document was identified as</p> <p>14 Plaintiff's Exhibit 49.)</p> <p>15 Q Okay. All right. I want to move</p> <p>16 on to 20 -- what will be the next document,</p> <p>17 49, and that is GA 9 through 13.</p> <p>18 Okay. And this is part of the same</p> <p>19 email trail that we were talking about, but if</p> <p>20 you look at, I think, the top of page three,</p> <p>21 we get some -- we get Mr. O'Connor's initial</p> <p>22 response; is that correct? It starts with,</p> <p>23 "Hi, Caulder, I'm in all next week except</p> <p>24 Friday the 23rd."</p> <p>25 A Okay. That appears to be his</p>

242	<p>1 response.</p> <p>2 Q Okay. Do you -- so the first sort</p> <p>3 of dash discusses meeting with Representative</p> <p>4 Golick. Who is Representative Golick?</p> <p>5 A A member of the House.</p> <p>6 Q In what district?</p> <p>7 A I'm not a hundred percent sure of</p> <p>8 his district number. I might say 40, but I'm</p> <p>9 not sure if that's accurate.</p> <p>10 Q Now, in the second bullet point</p> <p>11 referring to Representative Strickland, and in</p> <p>12 that he says he's not sure there's much more</p> <p>13 that we can do without saying -- without, say,</p> <p>14 endangering Representatives Rutledge and</p> <p>15 Welch. Representative Rutledge won reelection</p> <p>16 with 58 percent this time, but if you take</p> <p>17 from him to give to Brian, you could risk</p> <p>18 losing both seats.</p> <p>19 Do you agree, disagree, or have no</p> <p>20 opinion in terms of that statement?</p> <p>21 A Again, this is his analysis, but</p> <p>22 having known a little bit about that, those</p> <p>23 numbers, I would say that's probably a fair</p> <p>24 statement.</p> <p>25 Q Okay. And then in the next</p>	244	<p>1 A I'm sure that's a possibility.</p> <p>2 Q All right. And then there's a</p> <p>3 response from Mr. Harvill-Childs at the bottom</p> <p>4 of the second page.</p> <p>5 And you see his -- you see his</p> <p>6 response that "with Gwinnett," he wants to</p> <p>7 know, "what are our best chances at creating</p> <p>8 safer seats long-term even if one or two are</p> <p>9 sacrificed." Do you see that?</p> <p>10 A I do see that.</p> <p>11 Q And do you see -- has there been</p> <p>12 any effort to actually do that in Gwinnett?</p> <p>13 A By effort, what do you mean?</p> <p>14 Q Effort to create some additional</p> <p>15 safe seats by potentially sacrificing other</p> <p>16 seats?</p> <p>17 A I don't recall for the 2017, the</p> <p>18 bill, if it's what you're referencing that was</p> <p>19 done, there was no districts in Gwinnett that</p> <p>20 were included on that, so if that's how you</p> <p>21 would define effort, then there wasn't any</p> <p>22 effort.</p> <p>23 Q Okay. And then I'm going to the</p> <p>24 next part of the email chain further up on</p> <p>25 page two with Mr. O'Connor's response. He</p>
243	<p>1 paragraph he talks about Gwinnett being a</p> <p>2 tough call county because there were a number</p> <p>3 of marginal house seats and that the most</p> <p>4 heavily part of Gwinnett is to the far end of</p> <p>5 the county like 85 past the Mall of Georgia.</p> <p>6 Where's the Mall of Georgia?</p> <p>7 A I'm not sure.</p> <p>8 Q Okay. And he mentions the fact</p> <p>9 that Clinton won the seats of four Republican</p> <p>10 state reps, and they're all close together.</p> <p>11 Do you know whether that's true?</p> <p>12 A We looked at this data a fairly</p> <p>13 good bit, political data in the presidential</p> <p>14 race. And I'm not a hundred percent certain,</p> <p>15 but I would lean to think that this is</p> <p>16 correct.</p> <p>17 Q That, that trying to make any</p> <p>18 changes to Gwinnett might actually have a</p> <p>19 negative ramification for Republicans?</p> <p>20 A No. I was agreeing with what you</p> <p>21 said, that Clinton won those seats.</p> <p>22 Q Oh, okay. Do you agree with his</p> <p>23 point that, if you try to make more seats safe</p> <p>24 that -- for Republicans, you might end up</p> <p>25 losing seats?</p>	245	<p>1 types a lot faster than I did. He got a lot</p> <p>2 out there in four minutes, to both think and</p> <p>3 type.</p> <p>4 A As I said, Dan's very unique.</p> <p>5 Q And he mentions that someone</p> <p>6 mentioned to him that he might run for</p> <p>7 Jeffares' seat when he retires?</p> <p>8 A That's Senator Jeffares.</p> <p>9 Q Jeffares. So I guess he was going</p> <p>10 so fast that, did he misspell?</p> <p>11 A No.</p> <p>12 Q Is that how it's spelled?</p> <p>13 A That how it's spelled.</p> <p>14 Q Okay. Senator Jeffares. Do you</p> <p>15 know one way or another in fact whether</p> <p>16 Representative Strickland intends to run for</p> <p>17 Senator Jeffares' seat?</p> <p>18 A Yes, he does. He's already made</p> <p>19 that public.</p> <p>20 Q Okay.</p> <p>21 A Because Senator Jeffares is running</p> <p>22 for lieutenant governor, so that seat will be</p> <p>23 an open seat.</p> <p>24 Q Okay. Now, the last sentence says</p> <p>25 that -- O'Connor says he hasn't calculated the</p>

246	<p>1 Trump/Clinton numbers yet but will do so, and</p> <p>2 then he says in parens, his district is hard</p> <p>3 to calculate for president because there are</p> <p>4 so many split precincts in the district.</p> <p>5 Henry has a large -- lot of large precincts.</p> <p>6 And that's consistent with what we</p> <p>7 saw earlier, that there are five split</p> <p>8 precincts in the district?</p> <p>9 A Right. And as we discussed with</p> <p>10 the political data, the political data is only</p> <p>11 completely accurate to the whole precinct</p> <p>12 level, so in terms of trying to calculate</p> <p>13 political data, it's going to be an estimate</p> <p>14 once you go into those split precincts.</p> <p>15 Q Now, the -- further up in the</p> <p>16 chain, I'm now on the first page, it's</p> <p>17 O'Connor's January 5th, 2017, email, and it</p> <p>18 says, in the middle of the email, there's a</p> <p>19 sentence that says, "Traditionally, when we</p> <p>20 have done midterm redistricting, it has been</p> <p>21 consensual. Member A wants to give a precinct</p> <p>22 to Member B, and if member B agrees, the whole</p> <p>23 House votes for it. But that has been more by</p> <p>24 committee rule, certainly not by statute."</p> <p>25 Is this consistent with your</p>	248	<p>1 email that's in Exhibit 50?</p> <p>2 A I have seen it before.</p> <p>3 Q Okay. Do you recall Mr. O'Connor</p> <p>4 sending this email to you and you receiving</p> <p>5 it?</p> <p>6 A Yes, I do, sort of. I mean, it's</p> <p>7 in the middle of session, but yes.</p> <p>8 Q Okay. Do you recall why</p> <p>9 Mr. O'Connor was specifically emailing you</p> <p>10 about Districts 105 and 111?</p> <p>11 A I recall that I asked him something</p> <p>12 about one or the other districts or both, I</p> <p>13 don't remember what, and this was his</p> <p>14 response. But I don't remember what that</p> <p>15 question initially was.</p> <p>16 Q Do you have any idea why you were</p> <p>17 curious about Districts 105 and 111?</p> <p>18 A I don't know. Could have been</p> <p>19 something someone asked me. I don't know.</p> <p>20 Q Okay. And then toward the bottom,</p> <p>21 under Other General Comments, with respect to</p> <p>22 Gwinnett, it says, "Comparison of total</p> <p>23 turnout, black, white, et cetera, from SOS</p> <p>24 Credit For Voting reports."</p> <p>25 Do you know why he's talking about</p>
247	<p>1 understanding of the history in Georgia?</p> <p>2 A Yes. That midterm redistricting</p> <p>3 has been consensual? Is that what you're</p> <p>4 asking?</p> <p>5 Q Yes.</p> <p>6 A Yes.</p> <p>7 Q Now, in two thousand -- what do you</p> <p>8 mean by consensual?</p> <p>9 A When a member wants to make a</p> <p>10 change to their district, the other person who</p> <p>11 it affects also has to agree to it. That's</p> <p>12 what that means. Or all of the members</p> <p>13 affected have to agree to it, or there's no</p> <p>14 changes made.</p> <p>15 Q It doesn't mean consensual of the</p> <p>16 body as a whole, just as to those members?</p> <p>17 A Just the affected members of the</p> <p>18 district, that's correct.</p> <p>19 (Whereupon a document was identified as</p> <p>20 Plaintiff's Exhibit 50.)</p> <p>21 Q Okay. Thank you.</p> <p>22 All right. And then I want to move</p> <p>23 on to GA 77 and 78, and we'll mark that as</p> <p>24 Exhibit 50.</p> <p>25 Ms. Wright, do you recognize this</p>	249	<p>1 that?</p> <p>2 A I, I don't know why he's talking</p> <p>3 about that.</p> <p>4 Q Okay. And it shows that between</p> <p>5 2012 and 2016 the percentage of voters that</p> <p>6 were white in Gwinnett went down from 58.2</p> <p>7 percent to 52.3 percent. Were you aware of</p> <p>8 that?</p> <p>9 A I see it on this document, so at</p> <p>10 the time I read this, I would have been.</p> <p>11 Q Okay. And then moving on to the</p> <p>12 next page, do you see that it compares turnout</p> <p>13 in Henry County and that Henry County went</p> <p>14 from 52.2 percent white in 2012 to 47.9</p> <p>15 percent white in 2016?</p> <p>16 A Yes, I see that here.</p> <p>17 Q Okay. Was there any consideration</p> <p>18 at this time in terms of making changes to</p> <p>19 Districts 105 and/or District 111?</p> <p>20 A I think from the previous email</p> <p>21 that you referenced, you saw that there was</p> <p>22 consideration of making anything they could do</p> <p>23 in Gwinnett, if there was a possibility of</p> <p>24 doing anything there, which would have</p> <p>25 included 105 as that's part of Gwinnett</p>

250	<p>1 County.</p> <p>2 111, I think they had looked at, as</p> <p>3 he mentioned in the previous email, as well.</p> <p>4 Was there any changes that could be made to</p> <p>5 politically help Strickland any further, so</p> <p>6 there was that consideration there as well.</p> <p>7 (Whereupon a document was identified</p> <p>8 as Plaintiff's Exhibit 51.)</p> <p>9 Q Okay. I want to then mark as the</p> <p>10 next document Exhibit 51, and it's GA 14</p> <p>11 through 25.</p> <p>12 All right. And it's an email from</p> <p>13 Mr. O'Connor to Mr. Efstration; correct?</p> <p>14 A Uh-huh, yes.</p> <p>15 Q And I think we talked about earlier</p> <p>16 that Representative Efstration represents</p> <p>17 District 104?</p> <p>18 A Yes.</p> <p>19 Q And in the second paragraph, it</p> <p>20 talks about the "Gwinnett delegation is</p> <p>21 meeting Thursday afternoon and discuss with</p> <p>22 Brett Harrell some possible changes, taking a</p> <p>23 look at Gwinnett." Who's Brett Harrell?</p> <p>24 A He's a rep from Gwinnett County.</p> <p>25 Q A Republican rep?</p>	252	<p>1 Q Okay. And then the next paragraph</p> <p>2 references Chairman Caldwell. Who is Chairman</p> <p>3 Caldwell?</p> <p>4 A He's the chairman of the House</p> <p>5 Reapportionment Committee now.</p> <p>6 Q And it talks about getting moving</p> <p>7 by next week in terms of legislation. And now</p> <p>8 we're in February of 2017. Are you at this</p> <p>9 point working on a reapportionment plan for</p> <p>10 2017?</p> <p>11 A I don't recall dates on when things</p> <p>12 were worked on related to stuff that happened</p> <p>13 during this time.</p> <p>14 (Whereupon a document was identified as</p> <p>15 Plaintiff's Exhibit 52.)</p> <p>16 Q Okay. Then I want to move to</p> <p>17 Exhibit 52, and that is going to be GA 28 and</p> <p>18 29. And, Ms. Wright, who is Jan Jones?</p> <p>19 A She is a representative in the</p> <p>20 House and also the speaker pro tem.</p> <p>21 Q And what role did she have with</p> <p>22 respect to the proposed redistricting in 2017?</p> <p>23 A She had an exchange with a member</p> <p>24 she wanted to make.</p> <p>25 Q Other than that exchange, anything</p>
251	<p>1 A Yes.</p> <p>2 Q And this mentions a meeting of the</p> <p>3 Gwinnett delegation. Are you aware as to</p> <p>4 whether that meeting were all the reps from</p> <p>5 Gwinnett or just the Republicans reps from</p> <p>6 Gwinnett?</p> <p>7 A I don't think it was all of the</p> <p>8 reps. I think it -- I don't even think it was</p> <p>9 all of the Republican reps. I think it was a</p> <p>10 portion of the Republican delegation.</p> <p>11 Q Now, in the middle of the</p> <p>12 paragraph, it's referring to David Cassis, I</p> <p>13 believe?</p> <p>14 A Yes.</p> <p>15 Q And it says, "David also asked me</p> <p>16 other day if we could take this up in 2019, by</p> <p>17 which time presumably the Gwinnett lawsuits</p> <p>18 would be settled one way or the other, and of</p> <p>19 course we could do so in 2019."</p> <p>20 What's he referring to in terms of</p> <p>21 the Gwinnett lawsuits.</p> <p>22 A I assume he means the pending case</p> <p>23 related to the School Board and County</p> <p>24 Commission. I do not know why that would be</p> <p>25 relevant to them taking up the maps though.</p>	253	<p>1 else?</p> <p>2 A Not that I'm aware of.</p> <p>3 Q Do you know why Mr. O'Connor was</p> <p>4 listing a number of the districts in Gwinnett?</p> <p>5 A I do not.</p> <p>6 Q And also listing percentages for</p> <p>7 other Republican-held districts?</p> <p>8 A I don't know. As I told you</p> <p>9 before, Dan loves his data, and he loves to</p> <p>10 tell it to people. He loves all the data</p> <p>11 everywhere.</p> <p>12 Q Okay.</p> <p>13 A And he likes to share it, so.</p> <p>14 (Whereupon a document was identified</p> <p>15 as Plaintiff's Exhibit 53.)</p> <p>16 Q All right. All right. So next</p> <p>17 want to go to GA 92 to 94, and we'll call that</p> <p>18 53.</p> <p>19 MR. STRICKLAND: Can you say those</p> <p>20 GA numbers again?</p> <p>21 MR. GREENBAUM: 92 and 93 and 94.</p> <p>22 92 to 94.</p> <p>23 MR. STRICKLAND: Got it.</p> <p>24 Q So what is Exhibit 53?</p> <p>25 A This is an email.</p>

254	<p>1 Q From Mr. O'Connor to yourself?</p> <p>2 A Yes.</p> <p>3 Q And it's dated March 16th?</p> <p>4 A Right.</p> <p>5 Q Now, this references a -- the</p> <p>6 second and third page are draft minutes of a</p> <p>7 meeting of the Reapportionment Committee on</p> <p>8 March 1st, 2017, and it talks about</p> <p>9 considering HB 515; correct?</p> <p>10 A Yes.</p> <p>11 Q So prior -- at some point prior to</p> <p>12 March 1st, you would have created a proposed</p> <p>13 redistricting plan for 2017; correct?</p> <p>14 A Yes.</p> <p>15 Q And who, who, who was it that you</p> <p>16 were coordinating with, with respect to the</p> <p>17 2017 plan?</p> <p>18 A As far as putting together?</p> <p>19 Q Yes. Who had, who -- whose</p> <p>20 information -- who were you seeking input from</p> <p>21 in terms of creating that plan?</p> <p>22 A Well, as we've done before, members</p> <p>23 who had wanted to submit a change to be</p> <p>24 considered met with staff in our office or</p> <p>25 myself and worked on a map, took it to the</p>	256	<p>1 Q Oh, let me give you this --</p> <p>2 A Yeah, that would be better.</p> <p>3 Q Oh, no. I don't know what --</p> <p>4 A That looks a little better.</p> <p>5 Q I don't know what you got.</p> <p>6 A I don't either.</p> <p>7 Q We'll replace the exhibit number.</p> <p>8 MR. STRICKLAND: So we're not using</p> <p>9 this?</p> <p>10 MR. GREENBAUM: No.</p> <p>11 THE WITNESS: You got the bad one</p> <p>12 too?</p> <p>13 MR. GREENBAUM: Wait. That one's</p> <p>14 bad too?</p> <p>15 THE WITNESS: His is.</p> <p>16 MR. GREENBAUM: Oh. I don't know</p> <p>17 what --</p> <p>18 THE WITNESS: And his is too.</p> <p>19 MR. GREENBAUM: We had an issue</p> <p>20 with the coping service. So --</p> <p>21 THE WITNESS: That's right.</p> <p>22 Q Okay. So the one in front of you</p> <p>23 that we're now calling 54 is correct?</p> <p>24 A Yes.</p> <p>25 Q And what is Exhibit 54, Ms. Wright?</p>
255	<p>1 chairman. Chairman Caldwell made a decision</p> <p>2 to what's going to go into the map between he</p> <p>3 and Spiro.</p> <p>4 Once those decisions were made of</p> <p>5 what's going to be input into the map, then</p> <p>6 the map was pieced together.</p> <p>7 (Whereupon a document was identified as</p> <p>8 Plaintiff's Exhibit 54.)</p> <p>9 Q I want to mark as Exhibit 54 a</p> <p>10 two-page document, and the first page is</p> <p>11 entitled Proposed Georgia House Districts, and</p> <p>12 it's dated 2017.</p> <p>13 MR. STRICKLAND: I missed that</p> <p>14 number. Sorry.</p> <p>15 MR. GREENBAUM: No numbers.</p> <p>16 MR. STRICKLAND: No numbers.</p> <p>17 Q Ms. Wright, do you recognize this</p> <p>18 document?</p> <p>19 A I do, but this is not a document I</p> <p>20 would have created. This is not fully drawn</p> <p>21 and printed.</p> <p>22 Q Do you know who created it?</p> <p>23 A I don't because this map would have</p> <p>24 been shown in its entirety and there would be</p> <p>25 detail on this.</p>	257	<p>1 A This is the map that was proposed</p> <p>2 in 2017 session.</p> <p>3 Q Okay. And did you create</p> <p>4 Exhibit 54?</p> <p>5 A Yes.</p> <p>6 Q Okay. And Exhibit 54 doesn't</p> <p>7 include any proposed changes for Gwinnett</p> <p>8 County; correct?</p> <p>9 A That's correct.</p> <p>10 Q It does include proposed changes</p> <p>11 for District 111 in Henry County; correct?</p> <p>12 A Yes.</p> <p>13 Q And that district -- it was going</p> <p>14 to create a change between District 73 and</p> <p>15 District 111; correct?</p> <p>16 A Yes.</p> <p>17 Q And what was the substance of the</p> <p>18 change between District 73 and District 111?</p> <p>19 A In 111, we put a precinct back</p> <p>20 together and split a different precinct. The</p> <p>21 representative had had a request from some</p> <p>22 people in that area that he knew and had grown</p> <p>23 up around, and they were unhappy that they</p> <p>24 weren't able to vote for him. He wasn't on</p> <p>25 their ballot. And so he wanted to see if that</p>

258	<p>1 would be something we could do.</p> <p>2 Q And what district did you split,</p> <p>3 and what district did you put back together?</p> <p>4 A We put Mt. Carmel back together,</p> <p>5 and we split a portion of South Hampton.</p> <p>6 Q And so in the new plan, where did</p> <p>7 Mt. Carmel end up?</p> <p>8 A It's in District 73.</p> <p>9 Q Okay. So Mt. Carmel went to 73,</p> <p>10 and 111 took on a portion of South Hampton?</p> <p>11 A Yes.</p> <p>12 Q Okay. Do you know how that changed</p> <p>13 the performance of District 111 for a</p> <p>14 Republican candidate?</p> <p>15 A If I recall, it was about one</p> <p>16 percent maybe.</p> <p>17 Q One percent better or one percent</p> <p>18 worse?</p> <p>19 A One percent better for</p> <p>20 Representative Strickland.</p> <p>21 Q Okay. And do you recall</p> <p>22 Representative Strickland having a close</p> <p>23 election in 2016?</p> <p>24 A Yes.</p> <p>25 Q Do you recall Representative</p>	260	<p>1 Q Okay.</p> <p>2 A I don't know when that was exactly</p> <p>3 though.</p> <p>4 Q Okay. And when did that happen?</p> <p>5 A I don't know when that was exactly.</p> <p>6 Q Sorry. All right. Now, Mr.,</p> <p>7 Mr. O'Connor, the second and third pages of</p> <p>8 Exhibit 53 referenced minutes of -- or draft</p> <p>9 minutes of the meeting of the House</p> <p>10 Reapportionment Committee on March 1st;</p> <p>11 correct?</p> <p>12 A Yes.</p> <p>13 Q And did you attend that meeting?</p> <p>14 A Yes.</p> <p>15 Q Okay. Now, Representative -- the</p> <p>16 minutes reflect that Representative Scott</p> <p>17 expressed concern about the changes to</p> <p>18 Districts 73 and 111 in Henry County. Do you</p> <p>19 recall Representative Scott expressing</p> <p>20 concerns?</p> <p>21 A I honestly do not.</p> <p>22 Q Okay. Now, he said that he had</p> <p>23 sent an email to Ms. Miller the day after the</p> <p>24 March 1 meeting with a draft summary; correct?</p> <p>25 A Yes.</p>
259	<p>1 Strickland performing worse in -- than he did</p> <p>2 in 2014 with respect to some of the precincts</p> <p>3 that were not affected between 2014 and 2016?</p> <p>4 A Can you say that again?</p> <p>5 Q Yes. So there were a number of</p> <p>6 changes in District 111 and to -- in 2015;</p> <p>7 correct?</p> <p>8 A Yes, in '15.</p> <p>9 Q But there were some precincts that</p> <p>10 were not changed at all in 2015; correct?</p> <p>11 A Yes.</p> <p>12 Q Did you look at all as to how</p> <p>13 Representative Strickland performed in those</p> <p>14 unchanged precincts in '16 as compared to '14?</p> <p>15 A I don't recall looking at it</p> <p>16 precinct by precinct, the data that way.</p> <p>17 Q Now, Mr. O'Connor had been tasked</p> <p>18 by the chief of staff for the speaker to work</p> <p>19 on the redistricting; correct?</p> <p>20 A At that point in time, yes.</p> <p>21 Q Was there a certain point in time</p> <p>22 where things changed?</p> <p>23 A Yes.</p> <p>24 Q When did that happen?</p> <p>25 A When I found out about it.</p>	261	<p>1 Q Does the fact that he sent the</p> <p>2 minutes the day after the meeting itself lend</p> <p>3 credibility to the fact that Representative</p> <p>4 Scott expressed concern about changes to</p> <p>5 Districts 73 and 111?</p> <p>6 A I'm, I'm really not sure what</p> <p>7 the --</p> <p>8 Q Yeah.</p> <p>9 A -- what you're trying to get to.</p> <p>10 Q What I'm trying to get -- yeah.</p> <p>11 I'm not trying to -- I'm trying to get at the</p> <p>12 fact that he, that he sent the notes the day</p> <p>13 after.</p> <p>14 A Well, the meeting was held at</p> <p>15 5:00 p.m., so that would be probably why that</p> <p>16 happened pretty quick the first thing the next</p> <p>17 morning.</p> <p>18 Q The first thing the next morning.</p> <p>19 So the fact that he did it pretty quickly,</p> <p>20 does that make it more likely that the minutes</p> <p>21 are accurate in terms of portraying what</p> <p>22 happened?</p> <p>23 A Dan is pretty meticulous with his</p> <p>24 notes and details, so I would presume that</p> <p>25 this is an accurate summary.</p>

262	<p>1 I did not know Dan took notes on</p> <p>2 minutes on meetings until after I found this</p> <p>3 out. I think that's a carryover from when he</p> <p>4 worked for the committee as a research</p> <p>5 analyst. That's what he used to do, so he's</p> <p>6 always just continued to do that, but I did</p> <p>7 not know that he did that, and now I do.</p> <p>8 Q You did as of March 16th?</p> <p>9 A Yes.</p> <p>10 Q All right. Now, after this House</p> <p>11 meeting, in fact, there was a revised plan</p> <p>12 that, that was considered by the House;</p> <p>13 correct, a modified plan?</p> <p>14 A Can you start over again?</p> <p>15 Q Sure.</p> <p>16 A I'm not sure I heard all of it.</p> <p>17 Q Yes. What I wanted to get at: Was</p> <p>18 at a certain point in time, the House</p> <p>19 considered a second plan in 2017; correct?</p> <p>20 A The House considered a second plan?</p> <p>21 Q Yes. Or the Senate -- the Assembly</p> <p>22 considered a second plan; correct?</p> <p>23 A The House passed this version.</p> <p>24 When it got to the Senate, I believe there was</p> <p>25 a sub in the Senate committee that was</p>	264	<p>1 all of them, doing it at all, but, yes, I</p> <p>2 mean, I think that that was part of it, yeah.</p> <p>3 Those districts, those districts, you know I</p> <p>4 think people just didn't want to see anything</p> <p>5 done at that point anyhow.</p> <p>6 Q But the House passed it regardless;</p> <p>7 correct?</p> <p>8 A Yes, the House had passed it</p> <p>9 already. And then, like I said, this was in</p> <p>10 the Senate committee when they sent the bill</p> <p>11 in the committee there.</p> <p>12 Q Was there concern expressed with</p> <p>13 respect to 111 that by making these changes it</p> <p>14 would be more difficult for an</p> <p>15 African-American candidate to get elected to</p> <p>16 that district?</p> <p>17 A I don't recall that being</p> <p>18 specifically said, to me anyway.</p> <p>19 Q Okay. What do you recall being</p> <p>20 said about the changes between 73 and 111?</p> <p>21 A Specifically, I don't recall what</p> <p>22 comments were made about any specific</p> <p>23 district. I think more, more than anything</p> <p>24 people just didn't want to see the map being</p> <p>25 changed again in 2017.</p>
263	<p>1 different from this version, I think. Is that</p> <p>2 what you're getting at?</p> <p>3 Q Yes.</p> <p>4 A Okay.</p> <p>5 Q That there was a second version.</p> <p>6 A I think that's how it went down.</p> <p>7 Q Okay. And in that second version,</p> <p>8 the changes between 73 and 111 did not appear;</p> <p>9 correct?</p> <p>10 A Yes -- I mean, yes. Yes, they did</p> <p>11 not appear.</p> <p>12 Q And do you know why that change was</p> <p>13 taken out?</p> <p>14 A I think there were, there were</p> <p>15 those two districts removed as well as the two</p> <p>16 in this area here between Cobb and Fulton were</p> <p>17 also removed. There was a lot of comment, and</p> <p>18 I guess the members decided that it wasn't, it</p> <p>19 wasn't something they wanted to pursue because</p> <p>20 of that, so they chose to not make any changes</p> <p>21 and remove their portions of the districts.</p> <p>22 Q There was a lot of comment because</p> <p>23 people were critical of the changes between 73</p> <p>24 and 111?</p> <p>25 A Well, I think they were critical of</p>	265	<p>1 (Whereupon a document was identified as</p> <p>2 Plaintiff's Exhibit 55.)</p> <p>3 Q Okay. I want to move on to the</p> <p>4 next exhibit which I think is 55, and that's</p> <p>5 GA 86 to 90.</p> <p>6 MR. STRICKLAND: What was 54?</p> <p>7 MR. GREENBAUM: 54 was --</p> <p>8 MR. WILL: The map.</p> <p>9 MR. GREENBAUM: -- this messed up</p> <p>10 one.</p> <p>11 MR. STRICKLAND: Okay. Got it.</p> <p>12 MR. WILL: And page numbers again,</p> <p>13 tell me.</p> <p>14 MR. GREENBAUM: 86 to 90.</p> <p>15 MR. WILL: Thank you.</p> <p>16 Q Okay. Ms. Wright, do you recognize</p> <p>17 this document?</p> <p>18 A Yes.</p> <p>19 Q What is it?</p> <p>20 A It's a series of emails that began</p> <p>21 with Dan and an individual, and then at some</p> <p>22 point it began -- it was forwarded to me to</p> <p>23 respond to.</p> <p>24 Q Okay. And do you know who</p> <p>25 Ms. Cochard is?</p>

266	<p>1 A I do not.</p> <p>2 Q Okay. And this actually gives the</p> <p>3 history that you were talking about a couple</p> <p>4 of minutes ago, what was in the initial House</p> <p>5 bill and then what happened in the Senate;</p> <p>6 correct?</p> <p>7 A I think it --</p> <p>8 Q I'm looking --</p> <p>9 A I know what Dan's portion --</p> <p>10 Q -- at the first email on pages --</p> <p>11 A Okay.</p> <p>12 Q -- four and five.</p> <p>13 A Let me go back to that. I don't</p> <p>14 know what that says.</p> <p>15 Apparently, the initial email went</p> <p>16 to Deborah Miller. I didn't know that, or I</p> <p>17 didn't remember that.</p> <p>18 Yes, that does appear to describe</p> <p>19 what I just said about that bill.</p> <p>20 (Whereupon a document was identified as</p> <p>21 Plaintiff's Exhibit 56.)</p> <p>22 Q Okay. All right. And then I'm</p> <p>23 going to mark as Exhibit 56, GA 40 to 59.</p> <p>24 (Whereupon off-the-record discussions</p> <p>25 ensued.)</p>	268	<p>1 to email and file retention?</p> <p>2 A As -- no, I guess.</p> <p>3 Q No?</p> <p>4 A No.</p> <p>5 Q Do you have any procedures that you</p> <p>6 yourself follow in terms of email retention?</p> <p>7 A I archive emails. I delete junk.</p> <p>8 And it depends on -- I don't know. I don't</p> <p>9 archive often enough probably, but I do it by</p> <p>10 hand, so I don't do it -- I don't let it auto</p> <p>11 archive, which I probably should, but I don't.</p> <p>12 Q And so do you delete any emails</p> <p>13 that contain any substantive information</p> <p>14 about, for example, plans that you're working</p> <p>15 on?</p> <p>16 A No.</p> <p>17 Q And when you archive them, do you</p> <p>18 archive them into a particular folder?</p> <p>19 A I don't know where it goes. I</p> <p>20 just --</p> <p>21 Q Okay.</p> <p>22 A -- just do it.</p> <p>23 Q You just, it archives as a group</p> <p>24 of --</p> <p>25 A Yeah.</p>
267	<p>1 MR. STRICKLAND: Can we go off the</p> <p>2 record for just a second?</p> <p>3 MR. GREENBAUM: Sure.</p> <p>4 THE VIDEOGRAPHER: Going off video</p> <p>5 record.</p> <p>6 (Proceedings in recess, 4:51 p.m. to</p> <p>7 4:59 p.m.)</p> <p>8 THE VIDEOGRAPHER: We're now back</p> <p>9 on video record at 4:59 p.m. This is the</p> <p>10 beginning of file number six.</p> <p>11 Q All right. Ms. Wright, let's go</p> <p>12 back to Exhibit 56 for a couple of minutes.</p> <p>13 It's the document that you got just before we</p> <p>14 broke.</p> <p>15 A Okay.</p> <p>16 Q And what is Exhibit 56?</p> <p>17 A This is an email of the 2012 map</p> <p>18 packet, what was adopted in '12, and then a</p> <p>19 map of the 2015 Henry County portion that was</p> <p>20 sent to Representative Welch.</p> <p>21 Q And do you know why Representative</p> <p>22 Welch wanted this information?</p> <p>23 A I do not know that.</p> <p>24 Q Okay. In your office, do you have</p> <p>25 any standard operating procedures with respect</p>	269	<p>1 Q -- emails?</p> <p>2 A The folder, yeah, set it up in an</p> <p>3 archive folder that, from what I understand</p> <p>4 is, saved off of that network somewhere.</p> <p>5 Q Okay.</p> <p>6 A I don't know.</p> <p>7 Q And in coming up with, you and your</p> <p>8 staff, in terms of responding to the document</p> <p>9 request, you went through the archives?</p> <p>10 A Yes.</p> <p>11 Q Okay. I want to go back -- do you</p> <p>12 know why Representative Welch wanted the</p> <p>13 information that is contained in Exhibit 56?</p> <p>14 MR. STRICKLAND: Asked and</p> <p>15 answered.</p> <p>16 MR. WILL: Asked and answered.</p> <p>17 Q Okay.</p> <p>18 A Should I answer it again?</p> <p>19 MR. WILL: Yes.</p> <p>20 MR. STRICKLAND: Go ahead.</p> <p>21 A No, I don't know.</p> <p>22 Q Okay. All right. So I want to now</p> <p>23 go back to the Henry County 2015 plan, and I</p> <p>24 want to ask you about District 109.</p> <p>25 A Uh-huh (affirmative).</p>

270	<p>1 Q In, in your view, is District 109</p> <p>2 compact?</p> <p>3 A For the most part.</p> <p>4 Q Where, where would you consider it</p> <p>5 not to be compact?</p> <p>6 A Well, compact is hard to define,</p> <p>7 but the majority of the district is here --</p> <p>8 Q Can you describe --</p> <p>9 A -- and have this piece --</p> <p>10 Q -- what "here" is?</p> <p>11 A The majority of the district</p> <p>12 stretches from the Hickory Flat and Lake Haven</p> <p>13 precincts into Newton County and up into the</p> <p>14 corner of Rockdale County around, kind of</p> <p>15 centered around the East Lake and Kelleytown</p> <p>16 areas, and then stretches now further up into</p> <p>17 some of Stockbridge. But Stockbridge is a</p> <p>18 very large city, so it has some of Stockbridge</p> <p>19 in this area. This area down here is also</p> <p>20 Stockbridge but so is this out here.</p> <p>21 Q So do you have a sense, from end to</p> <p>22 end from, let's say, the edge of where</p> <p>23 Stagecoach is to where Mt. Bethel is, how many</p> <p>24 miles that is?</p> <p>25 A I do not.</p>	272	<p>1 county?</p> <p>2 A Oh, I wouldn't say that. The</p> <p>3 northwest part of the county is up there at</p> <p>4 the very top under the H, so it's not nearly</p> <p>5 as far north as the county stretches.</p> <p>6 Q But relative, relatively speaking,</p> <p>7 it's more north than several of the districts</p> <p>8 in the county; correct?</p> <p>9 A You mean 111 is located further</p> <p>10 north than other districts in the county?</p> <p>11 Q Yes.</p> <p>12 A A portion of it stretches further</p> <p>13 north than some of the other districts, but</p> <p>14 those districts do not -- are not centered in</p> <p>15 the same location that that district is.</p> <p>16 Q Okay. It goes all the way to the</p> <p>17 western boundary of the county; correct?</p> <p>18 A Yes.</p> <p>19 Q That Pates Creeks is in the western</p> <p>20 boundary?</p> <p>21 A Yes.</p> <p>22 Q And it goes all the way to the</p> <p>23 southeastern portion of the county too;</p> <p>24 correct?</p> <p>25 A Yes. It goes to Locust Grove area.</p>
271	<p>1 Q Okay. And then with respect to</p> <p>2 111, would you consider 111 to be compact?</p> <p>3 A 111 is more compact than it had</p> <p>4 previously been.</p> <p>5 Q Do you consider it to be compact</p> <p>6 now?</p> <p>7 A It's more compact than it was</p> <p>8 previously.</p> <p>9 Q So relatively speaking, it's more</p> <p>10 compact than it was before, but would you, but</p> <p>11 would you consider it to be --</p> <p>12 A Whichever district had these</p> <p>13 precincts that were here was going to be a</p> <p>14 little bit less compact than it had been. I</p> <p>15 think that this district running more this</p> <p>16 way, that was also a really long district in</p> <p>17 size.</p> <p>18 But, you know, this one going that</p> <p>19 way, east to west versus north to south,</p> <p>20 either way, they're going to be large</p> <p>21 districts in size. Henry County is very large</p> <p>22 geographic county. Precincts are large.</p> <p>23 Q Would it be fair to say that</p> <p>24 District 111 runs from the northwest part of</p> <p>25 the county to the southeast part of the</p>	273	<p>1 Q Okay. So you would say that 111 is</p> <p>2 more compact in 2015 than it was in 2012, but</p> <p>3 I didn't get a clear answer as to whether you</p> <p>4 consider it to be compact in 2015.</p> <p>5 A I mean, compact, there's not an</p> <p>6 easy way to define compactness to me. Could</p> <p>7 it be more compact? Possibly. But when you</p> <p>8 take into account other factors as you have to</p> <p>9 consider and that we were considering for the</p> <p>10 drawing of the district, I would say it's as</p> <p>11 compact as it can be and also fit with the</p> <p>12 criteria that were given.</p> <p>13 Q Okay. And as we mentioned before,</p> <p>14 it's the only one of the eight legislative</p> <p>15 districts in Henry County that is entirely in</p> <p>16 the county; correct?</p> <p>17 A That is correct.</p> <p>18 Q That, that the other districts</p> <p>19 either run to the -- it sort of creates, it</p> <p>20 sort of creates a diagonal across the county,</p> <p>21 wouldn't you say?</p> <p>22 A 111?</p> <p>23 Q 111.</p> <p>24 A I don't -- I guess you could say</p> <p>25 it's a diagonal. This is I-75, so it sort of</p>

274	<p>1 parallels to the interstate that runs through 2 it.</p> <p>3 Q And 175 -- and I-75 goes from the 4 northwest corner to basically the southeast 5 corner; correct?</p> <p>6 A I'd say it's in the middle of the 7 western boundary, you got a good distance 8 further up, but it comes in here, and Clayton 9 County comes across the line here and then runs 10 down.</p> <p>11 Q So the north edge of the county --</p> <p>12 A I have really short arms. If I can 13 point with this, the northern edge of the 14 county is all the way at the very top up here, 15 those little parts up there. So your District 16 76 takes in the very most northern precincts 17 that are in Henry County.</p> <p>18 Q Oh, I see.</p> <p>19 A District 90 comes in here and takes 20 in a large area that's in the northern -- this 21 is also taking part of Stockbridge, which is 22 somewhat in the northern area, even though 23 Stockbridge is annexed all the way down into 24 here, but --</p> <p>25 Q Okay.</p>	276	<p>1 the 111, but it had been in 110 before when it 2 looked like that.</p> <p>3 Q Okay. So one of -- so Westside in 4 both maps --</p> <p>5 A Was in 110.</p> <p>6 Q -- was not --</p> <p>7 A It was not moved.</p> <p>8 Q -- was in 110?</p> <p>9 A That's correct.</p> <p>10 Q And if Westside had been in 111, it 11 would make 111 less Republican?</p> <p>12 A Yes, I think so.</p> <p>13 Q Would it also make 111 less or more 14 black?</p> <p>15 A Possibly so.</p> <p>16 Q Let me ask the question again 17 because it's going to come out --</p> <p>18 A I would have to look.</p> <p>19 Q -- imprecise in the transcript. 20 Would it also make 111 more black?</p> <p>21 A Would Westside being in 111 make 22 111 more black?</p> <p>23 Q Yes.</p> <p>24 A I'd have to look at the 25 demographics of the Westside precinct. I</p>
275	<p>1 A But these precincts here are kind 2 of in between all of that. As I had mentioned 3 before, we didn't -- both District 109 and 111 4 had brand new incumbents that were elected in 5 2012 when the districts had just been drawn. 6 Neither of them had served in the House 7 before.</p> <p>8 So knowing the incum -- where the 9 incumbent is and their ability to reach the 10 district, you know, that is, that is also a 11 factor that was -- I was aware of, knowing 12 that this incumbent at the time lived here and 13 this one lived somewhere in here.</p> <p>14 Q Is there a reason why part of 15 McDonough is in District 111 but not Westside?</p> <p>16 A Westside was in 1 -- 110 on the 17 original map in '12 down there.</p> <p>18 Q Yeah. I'm just curious, even back 19 in 2012, I mean, McDonough kind of sticks out 20 to the east whereas Westside, going back to 21 your point --</p> <p>22 A If you look at the previous map, it 23 didn't quite do that, but if I recall, 24 Westside is more a Democratically leaning 25 precinct which would not have been helpful to</p>	277	<p>1 don't know that off the top of my head, but I 2 would think that there are -- there's a good 3 chance that that's the case.</p> <p>4 MR. POWERS: That was it.</p> <p>5 MR. GREENBAUM: All right. No 6 further questions at this time.</p> <p>7 MR. STRICKLAND: When you say at 8 this time, do you -- you may not have used all 9 your time. Do you anticipate any further 10 deposition testimony from this witness?</p> <p>11 MR. WILL: Aria, are you there?</p> <p>12 MS. BRANCH: Yes, I'm here. I'm 13 sorry. I didn't hear the question.</p> <p>14 MR. WILL: The question was: Do you 15 have any questions?</p> <p>16 MS. BRANCH: I have a -- I can, I 17 can ask a couple of questions. They're going 18 to be based on the 2011 map as amended by House 19 Bill 566.</p> <p>20 And, I'm sorry, I'll introduce 21 myself before I just ask a few short questions. 22 I'm Aria Branch, counsel for the Thompson 23 Plaintiff, and I'm from Perkins Coie in 24 Washington DC.</p> <p>25 ---</p>

278	<p>1 EXAMINATION</p> <p>2 BY MS. BRANCH:</p> <p>3 Q One question I have is whether or</p> <p>4 not there was any discussion about creating any</p> <p>5 additional majority-black districts in the 2011</p> <p>6 map?</p> <p>7 A When you refer to the 2011 map, you</p> <p>8 mean the first redraw following the census?</p> <p>9 Q Correct.</p> <p>10 A So when we, when we drew that map,</p> <p>11 we applied the new census data to our existing</p> <p>12 House districts, and although the number of</p> <p>13 majority-minority districts at that time was</p> <p>14 inclusive of districts whose deviations were</p> <p>15 not balanced, we made every effort to create at</p> <p>16 least that many majority-minority districts,</p> <p>17 and we were successfully able to do so.</p> <p>18 And because you use the same 2010</p> <p>19 census data to redraw, no, there has not been</p> <p>20 any further discussion of creating an</p> <p>21 additional district because we would be using</p> <p>22 the same data that we used previously.</p> <p>23 And along that same line, midterm</p> <p>24 redistricting that we've done, as we discussed,</p> <p>25 is normally a consensual process between the</p>	280	<p>1 MR. GREENBAUM: Frank?</p> <p>2 MR. STRICKLAND: The other question</p> <p>3 I had for you, Jon, is I don't know where you</p> <p>4 stand on how much of your time you've utilized,</p> <p>5 but are you finished with this witness, or are</p> <p>6 you reserving the right to ask her some more</p> <p>7 questions?</p> <p>8 MR. GREENBAUM: So the thing that,</p> <p>9 the thing that I'm particularly interested in,</p> <p>10 and we talked a little bit about this before,</p> <p>11 David and I, is I'm not sure -- the witness had</p> <p>12 talked about the fact that she had these</p> <p>13 folders for -- that they keep folders for each</p> <p>14 of the legislators, and that she sent the</p> <p>15 shape -- she sent the information from those</p> <p>16 folders that would have maps that were</p> <p>17 considered with respect to their districts,</p> <p>18 that she put them on a CD.</p> <p>19 I'm not sure that that information</p> <p>20 got to us. We got the documents that were one</p> <p>21 of the things that we asked for. I'm not sure</p> <p>22 that we got the alternate maps. And if we</p> <p>23 haven't gotten the alternate maps, then, you</p> <p>24 know, I would keep the deposition open</p> <p>25 specifically to discuss those alternate maps.</p>
279	<p>1 incumbents, so to create a new open seat would</p> <p>2 require two incumbents to willingly choose to</p> <p>3 say, let's draw a new district, and I'll be</p> <p>4 paired with this other incumbent and give up my</p> <p>5 seat in order to create an open seat, and that</p> <p>6 has not happened as far as I'm aware.</p> <p>7 Q Did the 2011 map have the same</p> <p>8 number of majority-minority districts as the</p> <p>9 2000 map, House of Representative districts?</p> <p>10 A As far as the 2000, you mean the map</p> <p>11 that was being used in the year 2000?</p> <p>12 Q Yeah. So the map immediately</p> <p>13 preceding the 2011 map, did that have, you</p> <p>14 know, as amended or however, did that have the</p> <p>15 same number of majority-minority districts as</p> <p>16 the map that was created in 2011, which was the</p> <p>17 map immediately preceding the 2010 census?</p> <p>18 A I would want to go back and</p> <p>19 double-check that, but if I'm not mistaken, I</p> <p>20 believe we added about six majority-minority</p> <p>21 districts following --</p> <p>22 Q Okay.</p> <p>23 A -- the new census data.</p> <p>24 MS. BRANCH: Okay. No further</p> <p>25 questions for me.</p>	281	<p>1 MR. STRICKLAND: To look at maps</p> <p>2 that weren't adopted?</p> <p>3 MR. GREENBAUM: Correct.</p> <p>4 THE WITNESS: Can I speak to that?</p> <p>5 RE-EXAMINATION</p> <p>6 BY MR. GREENBAUM:</p> <p>7 Q Yes.</p> <p>8 A Everything we had was on those</p> <p>9 disks. The shape files that were there were</p> <p>10 all of the alternative proposed shape files</p> <p>11 that I have.</p> <p>12 Now, I'm assuming you're aware of</p> <p>13 the ransomware virus we had that attacked our</p> <p>14 system. You knew about that?</p> <p>15 Q Yes.</p> <p>16 A And so anything that there could</p> <p>17 have been additional things that we have no</p> <p>18 record of now that were taken in that virus, if</p> <p>19 I had it in an email, like if I had a PDF or I</p> <p>20 had something, I had sent a proposal in an</p> <p>21 email, I was able to open the email, we could</p> <p>22 recreate those. Those were recreated, and</p> <p>23 anything that I had of that nature was included</p> <p>24 in those shape files.</p> <p>25 If it was never sent in an email and</p>

282	<p>1 I didn't have a printout and I didn't have 2 anything in hand, then those were -- they were 3 gone, and I -- I, of course, can't go back 4 three years and mentally say, oh, this is what 5 a proposal looked like. 6 Q Okay. So was -- so if it was in an 7 email, you would still have it, but if it was 8 just on your system, let's, let's give an 9 example of you've got a folder for Strickland 10 in 111. 11 A Uh-huh (affirmative). 12 Q If there were maps that along the 13 way were being considered for Strickland in 14 111, let's say, in 2015, would those have been 15 affected by the ransomware? 16 A If I had not sent it in an email and 17 I did not have a printout of it in some way, 18 shape, or form, then, yes, because the email -- 19 the virus happened in the fall of 2015. 20 I can say though with a relatively 21 good degree of certainty that there were not a 22 lot of alternative maps. I did not draw 23 multiple variations for -- of all the 17 24 districts that were in that bill, there were 25 not a lot of alternative versions drawn.</p>	284	<p>1 minutes. 2 MR. STRICKLAND: Okay. So you've 3 got about one hour. 4 MR. GREENBAUM: Got it. 5 MR. STRICKLAND: Just wanted to get 6 that part on the record so that we didn't have 7 a later disagreement on the subject. 8 MR. GREENBAUM: Fair enough. 9 MR. WILL: All right. Then I guess 10 we're done for today. 11 MR. GREENBAUM: Thank you. 12 THE VIDEOGRAPHER: All right. Going 13 off video record -- 14 MR. WILL: Thank you very much. 15 THE VIDEOGRAPHER: -- at 5:17 p.m. 16 (Proceedings adjourned, 5:17 p.m.) 17 18 19 20 21 22 23 24 25</p>
283	<p>1 They were one-stop map draws. Most 2 of them were simple things they wanted to do. 3 They had an objective. They said, can you do 4 this? We would do it, and that was it. And 5 those pieces were then put together to make up 6 what was that House Bill 566. So there 7 weren't, there weren't multiple iterations upon 8 iteration upon iteration of maps. 9 Q Okay. 10 A There just weren't. 11 MR. GREENBAUM: Okay. Thank you for 12 that. 13 It's not my intent to bring her 14 back, but I do want to technically keep the 15 deposition open. 16 MR. STRICKLAND: Okay. Let's 17 determine how much time that is so that we all 18 know what it is. 19 THE WITNESS: Like five minutes. 20 Just kidding. 21 MR. STRICKLAND: Do we know, 22 Mr. Reporter? 23 MR. WILL: How much time have we 24 been on the record, David, so far today? 25 THE VIDEOGRAPHER: 5 hours and 59</p>	285	<p>1 I, GINA H. WRIGHT, Deponent, 2 do hereby certify that I have read the 3 foregoing deposition, and the same is a true 4 and accurate transcript of my testimony, except 5 for the changes listed below, if any. 6 PAGE/LINE/CHANGE REASON 7 _____ 8 _____ 9 _____ 10 _____ 11 _____ 12 _____ 13 _____ 14 _____ 15 _____ 16 _____ 17 _____ 18 _____ 19 _____ 20 If additional space is needed, please attach 21 separate sheet(s) and indicate number of 22 additional page(s) here: _____ 23 _____ 24 GINA H. WRIGHT, Deponent 25 This ____ day of _____, 20____. Donovan Reporting, PC FAX: 770-428-5801 237 Roswell Street Marietta, GA 30060 Date of Deposition: 11-20-2017 CR: JM</p>

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1 CERTIFICATE OF COURT REPORTER
 2 STATE OF GEORGIA
 3 COUNTY OF COBB

4 I hereby certify that the foregoing
 5 deposition was reported as stated in the
 6 caption, and the questions and answers thereto
 7 were reduced to writing by me;

8 That the witness's right to read and
 9 sign the deposition was reserved;

10 That the foregoing pages 1 through 287
 11 represent a true, correct, and complete
 12 transcript of the evidence given on the
 13 above-referenced date by the witness, GINA H.
 14 WRIGHT, who was first duly sworn by me;

15 That I am not of kin or counsel to any
 16 of the attorneys or parties in this case.


17 I do hereby disclose pursuant to
 18 Article 10.B. of the Rules and Regulations of
 19 the Board of Court Reporting of the Judicial
 20 Council of Georgia that I am a Georgia
 21 Certified Court Reporter; that I am an employee
 22 of Donovan Reporting PC; that Donovan
 23 Reporting PC was contacted by the attorney
 24 taking the deposition to provide court
 25 reporting services for this deposition; that I

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1 am not taking this deposition under any
 2 contract that is prohibited by OCGA 15-14-37(a)
 3 and (b) or Article 7.C. of the Rules and
 4 Regulations of the Board; and I am not
 5 disqualified for a relationship of interest
 6 under OCGA 9-11-28(c).

7 There is no contract to provide
 8 reporting services between myself or any person
 9 with whom I have a principle and agency
 10 relationship nor any attorney at law in this
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 12 financial interest in this action, or agent for
 13 an attorney at law in this action, party to
 14 this action, or party having a financial
 15 interest in this action. Any and all financial
 16 arrangements beyond my usual and customary
 17 rates have been disclosed and offered to all
 18 parties.

19 This 5th day of December 2017.

20
 21 
 22 JOEL P. MOYER, CCR 2745
 23 Certified Court Reporter
 24
 25

A				
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IN THE MATTER OF

**Georgia State Conference of the
NAACP, et al
vs
Kemp**

Transcript of Deposition of

Gina H. Wright

On January 25, 2018

*Reported by Joel P. Moyer
Certified Court Reporter*



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THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

GEORGIA STATE CONFERENCE OF THE NAACP,
as an organization; LAVELLE LEMON, MARLON
REID, LAURETHA CELESTE SIMS, PATRICIA
SMITH, COLEY TYSON,
NAACP Plaintiffs,

AUSTIN THOMPSON, WAYNE SWANSON, DARRYL PAYTON,
AUDRA CUNNINGHAM, SABRINA MCKENZIE, JAMIDA
ORANGE, ANDREA SNOW, SAMMY ARREYMBI, LYNNE
ANDERSON, CORETTA JACKSON,
Thompson Plaintiffs,

vs. CASE NO. 1:17-cv-01427-TCB-WSD-BBM

BRIAN KEMP, in his official capacity as
Secretary of the State for the State of
Georgia,
Defendant.

- - -

Videotaped 30(b)(6) Deposition of
Georgia Legislative & Congressional
Reapportionment Office,
through GINA H. WRIGHT,

Taken by Jon M. Greenbaum,

Before Joel P. Moyer,
Certified Court Reporter,

At the Offices of
Balch & Bingham LLP,
Atlanta, Georgia,

On Thursday, January 25, 2018,
Beginning at 9:07 a.m. & ending at 10:50 a.m.

- - -

Volume of Testimony
(Exhibits Contained in Separate Volume)

VOLUME TWO

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293	<p>1 January 25, 2018</p> <p>2 9:07 a.m.</p> <p>3 (Whereupon the reporter provided a written</p> <p>4 disclosure to all counsel pursuant to</p> <p>5 Article 8.B. of the Rules and Regulations</p> <p>6 of the Board of Court Reporting.)</p> <p>7 THE VIDEOGRAPHER: All right. We</p> <p>8 are now on video record. This is the beginning</p> <p>9 of file number one. The date is January 25th,</p> <p>10 2018. The time is 9:07 a.m.</p> <p>11 GINA H. WRIGHT,</p> <p>12 being previously duly sworn, was examined</p> <p>13 and testified as follows:</p> <p>14 EXAMINATION</p> <p>15 BY MR. GREENBAUM:</p> <p>16 Q Ms. Wright, you understand that</p> <p>17 you're still under oath?</p> <p>18 A Yes.</p> <p>19 Q Since your last deposition, who have</p> <p>20 you talked to about this case?</p> <p>21 A Alex, probably.</p> <p>22 Q Anybody else?</p> <p>23 A Cris Correia with the Attorney</p> <p>24 General's office.</p> <p>25 Q Okay.</p>	295	<p>1 as Plaintiff's Exhibit 146.)</p> <p>2 Q Okay. All right. So I'm going to</p> <p>3 mark as Exhibit 146 a document that's Bates</p> <p>4 stamped GA-2-5092 and -- actually, GA2-5071 to</p> <p>5 GA2-5092, and the first page is entitled</p> <p>6 Population Breakdown of 2015 Change to House</p> <p>7 District 105.</p> <p>8 MR. KHOURY: Do we need to -- you</p> <p>9 want to go off the record?</p> <p>10 MR. GREENBAUM: Let's go off the</p> <p>11 record.</p> <p>12 THE VIDEOGRAPHER: Going off video</p> <p>13 record.</p> <p>14 (Whereupon off-the-record discussions</p> <p>15 ensued.)</p> <p>16 THE VIDEOGRAPHER: We're back on</p> <p>17 record.</p> <p>18 MR. GREENBAUM: Thank you.</p> <p>19 Q I'll mark this as 146. Ms. Wright,</p> <p>20 do you recognize Exhibit 146?</p> <p>21 A Yes.</p> <p>22 Q What is it?</p> <p>23 A It is a report I compiled for the</p> <p>24 Attorney General's office after the case was</p> <p>25 filed.</p>
294	<p>1 A Jack Park. My husband.</p> <p>2 Q Okay.</p> <p>3 A I'm not sure --</p> <p>4 Q Okay.</p> <p>5 A -- other than that.</p> <p>6 Q Have you spoken to any of the</p> <p>7 legislators about this case?</p> <p>8 A No.</p> <p>9 Q Any, anybody else in your office</p> <p>10 about this case?</p> <p>11 A Possibly.</p> <p>12 Q Who in your office did you speak to</p> <p>13 about this case?</p> <p>14 A Probably -- well, in term -- I'm</p> <p>15 not sure I understand what you mean in terms</p> <p>16 of talking about it because they knew that how</p> <p>17 long -- how long was your deposition kind of</p> <p>18 question or --</p> <p>19 Q I'm not talking --</p> <p>20 A -- how was it.</p> <p>21 Q Yeah, I'm not talking about things</p> <p>22 like scheduling or length. I'm talking about</p> <p>23 anything substantive.</p> <p>24 A Oh, no. Probably not.</p> <p>25 (Whereupon a document was identified</p>	296	<p>1 Q Okay. So, so I want to look at the</p> <p>2 first page. It says Demographic Information</p> <p>3 For House District 105 Changes, and it talks</p> <p>4 about the population that moved out of HD 105.</p> <p>5 Did you do any sort of analysis like this</p> <p>6 during the time you were doing the</p> <p>7 redistricting in 2015?</p> <p>8 A No.</p> <p>9 Q Okay. And would that, and would</p> <p>10 that be true of all the information that's in</p> <p>11 here that talks about the voting precinct</p> <p>12 breakdown of 105 and then it gets into a</p> <p>13 population breakdown including precinct</p> <p>14 breakdown of 111? You can flip through the</p> <p>15 document, see if you did any of this analysis</p> <p>16 at the time of your redistricting in 2005 --</p> <p>17 2015?</p> <p>18 A I did not do any of this analysis</p> <p>19 when we drew this in 2015.</p> <p>20 (Whereupon a document was identified</p> <p>21 as Plaintiff's Exhibit 134.)</p> <p>22 Q Okay. Thank you. And I want to --</p> <p>23 I want you to look at two maps now that were</p> <p>24 previously marked in another deposition. One</p> <p>25 map is 134, Exhibit 134, and it says Proposed</p>

297	<p>1 House District 104 and 105. And on the top it</p> <p>2 says Client: HD105; Plan: HD105amp1-2014; and</p> <p>3 Type: House.</p> <p>4 Ms. Wright, do you recognize that</p> <p>5 document?</p> <p>6 A Yes.</p> <p>7 Q What is, what is that document?</p> <p>8 A Based on the plan name 2014 year, I</p> <p>9 believe this would be a proposal that was</p> <p>10 drawn during session of 2014 for Districts 104</p> <p>11 and 105.</p> <p>12 Q Okay. And let's say that you're</p> <p>13 working on a -- strike that.</p> <p>14 Session typically ends for most</p> <p>15 years in the spring unless there's a special</p> <p>16 session; right?</p> <p>17 A That's correct.</p> <p>18 Q If you were working on a plan,</p> <p>19 let's say, in fall of 2014, would you have</p> <p>20 used 2014 in the title or 2015 in the title?</p> <p>21 A Typically, it would be 2015 because</p> <p>22 it wouldn't be into -- it wouldn't be in a</p> <p>23 bill until 2015.</p> <p>24 Q All right. Is this a, is this a</p> <p>25 plan that you worked on yourself?</p>	299	<p>1 A On this particular map?</p> <p>2 Q Yes.</p> <p>3 A I don't recall.</p> <p>4 (Whereupon a document was identified as</p> <p>5 Plaintiff's Exhibit 135.)</p> <p>6 Q Okay. There's a second map, and</p> <p>7 that one is HD105ampd2-2014, previously marked</p> <p>8 as 135. Ms. Wright, do you recognize that</p> <p>9 map?</p> <p>10 A Yes.</p> <p>11 Q Okay. Is that a map that you</p> <p>12 worked on?</p> <p>13 A Yes.</p> <p>14 Q And did you ever meet with</p> <p>15 Representative Chandler to go over these two</p> <p>16 maps?</p> <p>17 A I don't recall if I met with her to</p> <p>18 go over them.</p> <p>19 Q Did you ever have any discussions</p> <p>20 with Ms. Chandler about the two maps or</p> <p>21 communications?</p> <p>22 A I don't recall if I sent them to</p> <p>23 her in an email or if we -- she came in the</p> <p>24 office and picked up copies of it. I don't</p> <p>25 recall how that --</p>
298	<p>1 A Yes.</p> <p>2 Q Okay. And do you recall working on</p> <p>3 a plan involving Districts 104 and 105 in the</p> <p>4 2014 legislative session?</p> <p>5 A Yes.</p> <p>6 Q Could you, could you describe,</p> <p>7 could you describe what happened? Could you</p> <p>8 describe -- strike that.</p> <p>9 Did a legislator come to you with</p> <p>10 the idea of modifying Districts 104 or 105?</p> <p>11 A Yes, in a way.</p> <p>12 Q What do you mean by "in a way"?</p> <p>13 A Well, I don't think they said, you</p> <p>14 know, I want to change the districts. I think</p> <p>15 it was more of a, can we look to see if</p> <p>16 there's anything to do to change the districts</p> <p>17 in a way that would make the district a little</p> <p>18 more politically favorable for that member.</p> <p>19 Q And was the member that you were</p> <p>20 trying to seek making the plan more</p> <p>21 politically favorable to Ms. Chandler?</p> <p>22 A Yes.</p> <p>23 Q Was Mr. Efstoration, Representative</p> <p>24 Efstoration who represents 104, at any point</p> <p>25 consulted in this process?</p>	300	<p>1 Q Okay.</p> <p>2 A -- was transferred.</p> <p>3 (Whereupon documents were identified</p> <p>4 as Plaintiff's Exhibit 108 and</p> <p>5 Plaintiff's Exhibit 110.)</p> <p>6 Q I want you to look at -- keep those</p> <p>7 maps out because we're going to continue to</p> <p>8 talk about them. I want you to look at a</p> <p>9 document previously marked as Exhibit 108.</p> <p>10 And at the top it says HD105 amp --</p> <p>11 amdp1_2014_data. And then there's a similar</p> <p>12 document previously marked as Exhibit 110,</p> <p>13 HD105_ampd2_2014 data.</p> <p>14 MR. GREENBAUM: Hello?</p> <p>15 MS. BRANCH: Hey. This is Aria</p> <p>16 Branch from Perkins Coie on the line.</p> <p>17 MR. GREENBAUM: Great.</p> <p>18 Q Ms. Wright, do you recognize these</p> <p>19 documents?</p> <p>20 A I know what they are, yes.</p> <p>21 Q What, what are they?</p> <p>22 A It looks like a summary report of</p> <p>23 the two maps you just showed me.</p> <p>24 Q Okay. And are these summary</p> <p>25 reports that your office produces?</p>

301	<p>1 A Standardly, no.</p> <p>2 Q Okay. Do you recall, do you recall</p> <p>3 looking at this data previously?</p> <p>4 A Specifically, no, but I'm sure that</p> <p>5 I did in working on these maps.</p> <p>6 Q Okay. Are these two documents,</p> <p>7 Exhibits 108 and 110, documents that your</p> <p>8 office produced?</p> <p>9 A We -- yes, I did produce these</p> <p>10 documents.</p> <p>11 Q Okay. Let me go back to the maps</p> <p>12 for a second and the data, and maybe we'll</p> <p>13 start with the ampd1, the map and the data.</p> <p>14 I notice, actually, comparing ampd1</p> <p>15 to ampd2, that is it correct to say that the</p> <p>16 second plan equalizes the black population in</p> <p>17 Districts 104 and 105 more than the first plan</p> <p>18 did?</p> <p>19 A When you say "equalizes" --</p> <p>20 Q In other words, they're closer</p> <p>21 together? In the first plan, 105 is 30</p> <p>22 percent black VAP, 104 is less than 24</p> <p>23 percent. And in the second plan, those</p> <p>24 numbers come closer together. They're both</p> <p>25 about 28 percent.</p>	303	<p>1 A And these are not in color, and so</p> <p>2 it's a little bit more challenging for me to</p> <p>3 say what's what.</p> <p>4 Q Okay.</p> <p>5 A And the labels are blurry.</p> <p>6 Q All right. So let's go back to I</p> <p>7 think it's ampd1. And that one, compared to</p> <p>8 the current plan, Harbins A and Harbins C are</p> <p>9 completely in 105; is that correct?</p> <p>10 A That appears to be the case, yes.</p> <p>11 Q Okay. And did you ever discuss</p> <p>12 with Representative Efrstration the possibility</p> <p>13 of Harbins A and Harbins C both moving to</p> <p>14 District 105 from District 104?</p> <p>15 A In the drafting of this particular</p> <p>16 map?</p> <p>17 Q Yes.</p> <p>18 A I don't recall having a</p> <p>19 conversation with him on this.</p> <p>20 Q Okay. How about in 2015?</p> <p>21 A I think that I did meet with him at</p> <p>22 that point to discuss the changes --</p> <p>23 Q Okay.</p> <p>24 A -- and what that would entail.</p> <p>25 Q Okay. Did he offer any input in</p>
302	<p>1 A That's what these appear to show,</p> <p>2 yes.</p> <p>3 Q All right. And in the second plan,</p> <p>4 were you trying to equalize the black VAP in</p> <p>5 the two districts?</p> <p>6 A No.</p> <p>7 Q Even though they're only, what,</p> <p>8 100th of a percent apart in black VAP?</p> <p>9 A No.</p> <p>10 Q Okay.</p> <p>11 A The reason these reports were</p> <p>12 produced is because we don't standardly</p> <p>13 produce the political data, but since that was</p> <p>14 the objective in the maps, these custom</p> <p>15 reports are put together to show the impact of</p> <p>16 that data.</p> <p>17 Q Okay. What are the differences</p> <p>18 between ampd1 and ampd2?</p> <p>19 A Well, in differences, what exactly</p> <p>20 do you mean?</p> <p>21 Q Well, for example, are there</p> <p>22 precincts that were moved in or moved out?</p> <p>23 A Honestly, I don't recall, and I'd</p> <p>24 have to look at these for a while to see.</p> <p>25 Q Okay.</p>	304	<p>1 terms of his views on which district Harbins A</p> <p>2 and Harbins C should be in?</p> <p>3 A I don't recall specifically.</p> <p>4 Q Did -- who was the chair of the</p> <p>5 Reapportionment Committee in 2014?</p> <p>6 A I'm not sure.</p> <p>7 Q Do you recall, do you recall having</p> <p>8 any communications with any legislators other</p> <p>9 than Representative Chandler in 2014 with</p> <p>10 respect to 104 and 105?</p> <p>11 A No, I don't recall having any</p> <p>12 conversations, but I talk to legislators</p> <p>13 throughout the session, but I don't recall</p> <p>14 anything about this.</p> <p>15 Q Do you recall -- do you have any</p> <p>16 sense of the timing, other than it was during</p> <p>17 the session, that you worked, that you worked</p> <p>18 on these plans?</p> <p>19 A I don't recall when during the</p> <p>20 session, but I think that she understood and</p> <p>21 as far as my understanding was that there was</p> <p>22 not going to be any changes to the map in</p> <p>23 2014. So for her, it was more of a, just an</p> <p>24 exploratory look at her district and the</p> <p>25 precincts surrounding it and what we could do</p>

305	<p>1 with the political numbers.</p> <p>2 Of course, we knew with an election</p> <p>3 in 2014 that that would be political data that</p> <p>4 would be more current after that election to</p> <p>5 review, so I think this was just an initial</p> <p>6 look to see if anything or if there was any</p> <p>7 way to give her any, any political help in her</p> <p>8 district because it was so competitive.</p> <p>9 Q When you started the process of</p> <p>10 looking to redraw 104 and 105 for the 2015</p> <p>11 legislative session, did you use either of</p> <p>12 these prior draft plans in that process?</p> <p>13 A I don't recall looking at these in</p> <p>14 that process, no.</p> <p>15 Q In any of the communications that</p> <p>16 you had with Ms. Chandler in the 2014</p> <p>17 legislative session with respect to that plan,</p> <p>18 do you recall Mr. O'Connor being involved in</p> <p>19 those?</p> <p>20 A No.</p> <p>21 Q And do you recall having any</p> <p>22 discussions with Mr. O'Connor prior to the</p> <p>23 2014 election about making changes to 105?</p> <p>24 A I don't recall having that</p> <p>25 conversation, no.</p>	307	<p>1 say yes.</p> <p>2 Q Okay. And that's usually an</p> <p>3 indication that something has been produced by</p> <p>4 that office?</p> <p>5 A Yes.</p> <p>6 Q Okay. With respect to the 2011</p> <p>7 redistricting, did you do any work with</p> <p>8 respect to the districts in Henry County?</p> <p>9 A Yes.</p> <p>10 Q What work did you do with respect</p> <p>11 to the state legislative districts in Henry</p> <p>12 County?</p> <p>13 A Can you be more specific?</p> <p>14 Q What was your role in terms of --</p> <p>15 were you involved at all in the drawing of</p> <p>16 those districts?</p> <p>17 A Yes.</p> <p>18 Q Okay. Did you work with</p> <p>19 Mr. Cullefer with respect to those districts?</p> <p>20 A No.</p> <p>21 (Whereupon a document was identified</p> <p>22 as Plaintiff's Exhibit 148.)</p> <p>23 Q Okay. I want to mark as</p> <p>24 Exhibit 148 a document that's an email or a</p> <p>25 series of emails. It's numbered 5165 to 5171.</p>
306	<p>1 MR. GREENBAUM: Okay. Go off the</p> <p>2 record for a second.</p> <p>3 THE VIDEOGRAPHER: Going off video</p> <p>4 record at 9:25 a.m.</p> <p>5 (Whereupon off-the-record discussions</p> <p>6 ensued.)</p> <p>7 THE VIDEOGRAPHER: Back on video</p> <p>8 record at 9:26 a.m.</p> <p>9 (Whereupon a document was identified</p> <p>10 as Plaintiff's Exhibit 147.)</p> <p>11 Q All right. I want to mark as</p> <p>12 Exhibit 147 a document entitled HD 109-work</p> <p>13 dated 5-2-11.</p> <p>14 MR. STRICKLAND: What was that</p> <p>15 number again, Jon?</p> <p>16 THE COURT REPORTER: It's 147.</p> <p>17 MR. KHOURY: 147.</p> <p>18 MR. STRICKLAND: Okay. Thank you.</p> <p>19 Q Ms. Wright, do you recognize this</p> <p>20 document?</p> <p>21 A No.</p> <p>22 Q Is it something that would have</p> <p>23 come out of the Legislative & Congressional</p> <p>24 Reapportionment Office?</p> <p>25 A It's got our seal on it, so I'll</p>	308	<p>1 And, you know, the first couple of pages are</p> <p>2 some emails between Representative Welch and</p> <p>3 Mr. Cullefer with respect to HD 110, and then</p> <p>4 the third page of the document is a map that's</p> <p>5 at 5167, and it says Henry County Proposed 1.</p> <p>6 Does that -- this map look familiar</p> <p>7 to you at all, Ms. Wright?</p> <p>8 A No, it does not.</p> <p>9 Q Okay. And then on the next page,</p> <p>10 there's a map called Henry County Proposed</p> <p>11 2. Does that look familiar to you?</p> <p>12 A No.</p> <p>13 Q Okay. And the -- we talked the</p> <p>14 last time about how your office organized</p> <p>15 files, and it's usually by district. And this</p> <p>16 plan says Henry -- or both of these plans say</p> <p>17 Henry in terms of the Plan; is that correct?</p> <p>18 A That's what this says.</p> <p>19 Q Yeah. Would there be a folder that</p> <p>20 your office kept that would have been under</p> <p>21 Henry?</p> <p>22 A There are local folders that we</p> <p>23 keep for the counties. Those folders are for</p> <p>24 local district plans, which is commissions and</p> <p>25 school boards. I've never seen this or this</p>

309	<p>1 plan name in our system, and I'm using it</p> <p>2 every day, so I would venture to say that this</p> <p>3 was not saved in the place that most things</p> <p>4 were.</p> <p>5 Kade very likely could have --</p> <p>6 Mr. Cullefer could have saved it on his</p> <p>7 personal drive somewhere. He was new to our</p> <p>8 staff at that point as well.</p> <p>9 (Whereupon a document was identified as</p> <p>10 Plaintiff's Exhibit 149.)</p> <p>11 Q Okay. I'm going to show you</p> <p>12 another series of documents starting at --</p> <p>13 A Are we done with that one?</p> <p>14 Q Yes, we are. -- starting at 5461,</p> <p>15 and that's going to be Exhibit 149. And this</p> <p>16 is a series. It's an email and some data, and</p> <p>17 the last page is a map, all involving -- and</p> <p>18 the subject of the map is called "Henry</p> <p>19 plans." And it talks about "Attached are your</p> <p>20 respective plans and data in PDF and Excel."</p> <p>21 Ms. Wright, do you recognize any of</p> <p>22 these documents?</p> <p>23 A I do not. It's our office's policy</p> <p>24 during a redistricting, or anytime really,</p> <p>25 that a member can come in and sit down with a</p>	311	<p>1 what that would be exactly. And the colors</p> <p>2 are not there, so it's also impossible to</p> <p>3 tell.</p> <p>4 Q Did you ever work with</p> <p>5 Representative Welch during the 2011</p> <p>6 redistricting with respect to his district?</p> <p>7 A I don't recall.</p> <p>8 (Whereupon a document was identified</p> <p>9 as Plaintiff's Exhibit 152.)</p> <p>10 Q All right. I'm going to show you a</p> <p>11 couple more plans from the 2011 period to see</p> <p>12 if they look familiar to you at all. I'm</p> <p>13 going to mark as Exhibit 152 a document that's</p> <p>14 numbered 3033.</p> <p>15 Ms. Wright, you can probably</p> <p>16 anticipate my question. Does this document</p> <p>17 look familiar to you at all?</p> <p>18 A I can't say that it jumps out at me</p> <p>19 as something familiar or no.</p> <p>20 Q Okay. It does have the stamp from</p> <p>21 your office, so it would be a document</p> <p>22 produced by your office?</p> <p>23 A Yes.</p> <p>24 (Whereupon a document was identified as</p> <p>25 Plaintiff's Exhibit 153.)</p>
310	<p>1 staff member and draw whatever it is they want</p> <p>2 to draw, so I would expect that's what this</p> <p>3 was, is Representative Welch's work.</p> <p>4 (Whereupon a document was identified as</p> <p>5 Plaintiff's Exhibit 150.)</p> <p>6 Q All right. I'm going to mark as</p> <p>7 150, again, it's numbered GA2-5182 to 5187.</p> <p>8 And it's an email and a map and plans again,</p> <p>9 and this is between Mr. -- or Representative</p> <p>10 Welch and Mr. Cullefer. And we'll mark it as</p> <p>11 150.</p> <p>12 Ms. Wright, any of the data or maps</p> <p>13 and plans look familiar to you?</p> <p>14 A No.</p> <p>15 (Whereupon a document was identified as</p> <p>16 Plaintiff's Exhibit 151.)</p> <p>17 Q Okay. All right. I'm going to</p> <p>18 mark as 151 -- this is also -- it starts</p> <p>19 GA2-5467 to 69, and the first page is an email</p> <p>20 from Mr. Cullefer to Mr. Welch. It's dated</p> <p>21 August 17th, 2011. 151.</p> <p>22 Do the maps there look familiar to</p> <p>23 you at all, Ms. Wright?</p> <p>24 A It's hard to say. There's no plan</p> <p>25 name attached to it, so I can't say for sure</p>	312	<p>1 Q Okay. All right. I want to mark a</p> <p>2 document as document 153, and it's an email</p> <p>3 from Gina Wright to Dale Rutledge cc'ing Dan</p> <p>4 O'Connor. It's dated November 14th, 2014, and</p> <p>5 it's a GA2-4682.</p> <p>6 Ms. Wright, do you recognize this</p> <p>7 document?</p> <p>8 A I mean, I see that I sent it --</p> <p>9 Q Okay.</p> <p>10 A -- but I don't recall it</p> <p>11 specifically.</p> <p>12 Q Okay. And as far as you know, this</p> <p>13 was an email that you actually sent; correct?</p> <p>14 A That's what it appears to be, yes.</p> <p>15 Q Okay. Do you recall shortly after</p> <p>16 the 2014 election Representative Rutledge --</p> <p>17 and now I'm referring to the bottom part of</p> <p>18 the email in the chain from him -- asking</p> <p>19 about getting voting numbers for his district,</p> <p>20 Brian's district in 111, and Andy's district</p> <p>21 in 109?</p> <p>22 A Yes, I recall that.</p> <p>23 Q Okay. And do you -- did you have</p> <p>24 any indication as to why he was interested in</p> <p>25 that information?</p>

313	<p>1 A Well, Brian's district was much</p> <p>2 more competitive and a closer election, so</p> <p>3 they wanted to see if there was any way to</p> <p>4 politically give him a little advantage in his</p> <p>5 district.</p> <p>6 Q Okay. And in his email, he asks</p> <p>7 for comparison of the 2010 results with this</p> <p>8 year's results demographically. Did you have</p> <p>9 an understanding about what he meant when he's</p> <p>10 saying demographically?</p> <p>11 A When I read something that says</p> <p>12 what he said with demographically, total</p> <p>13 votes, where the votes came from, and</p> <p>14 percentage of change Republican/Democrat, that</p> <p>15 means they want everything we can give them,</p> <p>16 all of the information related to that</p> <p>17 district or --</p> <p>18 Q And --</p> <p>19 A -- their district.</p> <p>20 Q Sorry. And that would include the</p> <p>21 racial data?</p> <p>22 A Yes.</p> <p>23 (Whereupon a document was identified as</p> <p>24 Plaintiff's Exhibit 154.)</p> <p>25 Q Thank you. All right. I want to</p>	315	<p>1 A No.</p> <p>2 (Whereupon a document was identified</p> <p>3 as Plaintiff's Exhibit 155.)</p> <p>4 Q All right. I want to move on now</p> <p>5 to Exhibit 155. And this is -- we're going to</p> <p>6 have to fasten this in some way. It's</p> <p>7 numbered GA2-4370 to 4418. It's possible that</p> <p>8 might actually be two versions of the same</p> <p>9 document. Let me take that really quick and</p> <p>10 just separate them.</p> <p>11 Ms. Wright, do you recognize this</p> <p>12 document or what this is?</p> <p>13 A I mean, it's a conversation that I</p> <p>14 had with the Jeff Lanier in legislative</p> <p>15 counsel.</p> <p>16 Q Okay. And then there's a large</p> <p>17 document that follows that starts at 4372 to</p> <p>18 4418. Do you recognize what that is?</p> <p>19 A Yes.</p> <p>20 Q What is that?</p> <p>21 A That is the committee substitute</p> <p>22 bill that was passed out of the House</p> <p>23 committee.</p> <p>24 Q Okay. And what substitutions were</p> <p>25 made between the original bill and the</p>
314	<p>1 mark as 154 an email from Dan O'Connor to</p> <p>2 Spiro Amburn dated Friday, December 19th,</p> <p>3 2014, and it's number GA2-861.</p> <p>4 And, Ms. Wright, I want to call</p> <p>5 your attention to the third paragraph, which</p> <p>6 is just a one-sentence paragraph. It says,</p> <p>7 "Gina and I are set to meet with</p> <p>8 Representative Strickland at 10:00 this Monday</p> <p>9 the 22nd, if want to stop by."</p> <p>10 A Can I read the rest of this?</p> <p>11 Q Absolutely.</p> <p>12 A Okay.</p> <p>13 Q All right. So going to the third</p> <p>14 paragraph, it refers to you and Mr. O'Connor</p> <p>15 being set to meet with Representative</p> <p>16 Strickland on Monday I guess the 22nd of</p> <p>17 December 2014. Do you recall meeting with</p> <p>18 Representative Strickland and Mr. O'Connor at</p> <p>19 around that time?</p> <p>20 A I recall meeting with</p> <p>21 Representative Strickland, but I couldn't tell</p> <p>22 you when, and I don't recall Dan being in any</p> <p>23 of those meetings.</p> <p>24 Q Okay. Do you recall Mr. Amburn</p> <p>25 being in any of those meetings?</p>	316	<p>1 substitute bill?</p> <p>2 A On the original bill, there were</p> <p>3 two districts out near Augusta that were</p> <p>4 included. They decided they just didn't want</p> <p>5 to make a change after all and came out of the</p> <p>6 bill. And there were two districts in the</p> <p>7 Atlanta area that did want to make a change</p> <p>8 and didn't get in on the first draft, so they</p> <p>9 were added in.</p> <p>10 Q Were there any changes that</p> <p>11 affected Districts 105 to 111 in substitute?</p> <p>12 A No.</p> <p>13 Q Okay. And we can go back and look</p> <p>14 at some other documents that may refresh your</p> <p>15 memory, but do you recall that the bill was</p> <p>16 initially dropped on Thursday the 5th of</p> <p>17 March, a few days before this document?</p> <p>18 A I don't know that --</p> <p>19 Q Okay.</p> <p>20 A -- date.</p> <p>21 Q Okay. But you recall that the</p> <p>22 substitute was ready as of March 9th?</p> <p>23 A That's what this says.</p> <p>24 Q Okay. All right. I want to move</p> <p>25 on now to -- oh, and the document going from</p>

317	<p>1 4372 through 4418 does reflect the language in 2 the substitute? 3 A By language, you mean the change 4 to -- what was included and what was changed? 5 Q Well, the amended version. 6 A Yes. This has the two districts 7 that added in, and it does not have the two 8 that come out. 9 Q And this was ultimately the version 10 that was enacted? 11 A Yes. 12 (Whereupon a document was identified as 13 Plaintiff's Exhibit 156.) 14 Q Thank you. All right. I want to 15 move to Exhibit 156, which is numbered from 16 GA2-441 to 442, and it's an email from Dan 17 O'Connor to Elizabeth Holcomb. It's a series 18 of emails. 19 In part of that exchange, 20 Mr. O'Connor -- actually, let me ask, first of 21 all, who is Ms. Holcomb? 22 A Presently, she's the director of 23 the senate research office. At that time, I 24 think she was just a staff member. 25 Q Okay. And do you know what in --</p>	319	<p>1 to Phyllis Williams. 2 Ms. Wright, do you recognize this 3 document? 4 A I do. 5 Q What is it? 6 A An email between me and Phyllis 7 Williams. 8 Q And who is Phyllis Williams? 9 A Phyllis was the secretary to the 10 chairman of our senate redistricting committee 11 last session. 12 Q Okay. And the, the last page of 13 the document refers to Rules for the Senate 14 Committee on Reapportionment and Redistricting 15 for 2017. Do you recognize that document? 16 A Yes. 17 Q Did you play any role at all in 18 terms of the construction of these rules? 19 A The chairman at the time knew what 20 he wanted the rule to be to handle the 21 business of the committee. I had the copy, I 22 think, saved from the previous session, and so 23 he asked me to edit that the way he wanted it. 24 That's what this is. 25 Q Okay. Thank you.</p>
318	<p>1 what if any role she had with respect to 2 redistricting in the 2015 -- 3 A None. 4 Q -- legislative session? Okay. Do 5 you know why she was interested in the House 6 or Senate redistricting principles? 7 A I don't know. She's senate 8 research office, so senators ask them to 9 research things for them. So most likely 10 someone asked. As she said, someone -- she 11 got a request for it, so -- 12 Q All right. 13 A -- someone asked her. 14 Q In Mr. O'Connor's email to her, 15 9:53 a.m., he mentions, he references checking 16 with you regarding House or Senate 17 redistricting principles. Do you recall 18 having that conversation with -- or that 19 communication with Mr. O'Connor? 20 A I do not. 21 (Whereupon a document was identified as 22 Plaintiff's Exhibit 157.) 23 Q All right. I want to mark as 157 a 24 document numbered GA2-4652 and 53, and the top 25 of the document is an email from Gina Wright</p>	320	<p>1 A Uh-huh (affirmative). 2 (Whereupon a document was identified as 3 Plaintiff's Exhibit 158.) 4 Q I want to move on now to a document 5 I want to mark as Exhibit 158. It's an email 6 from Dan O'Connor to Gina Wright, and it's 7 entitled Comparison of HD 105 and 111. And 8 we'll mark it as Exhibit 158. 9 MR. STRICKLAND: I think it's 159. 10 Is it? The most recent one was 158. 11 MR. KHOURY: No. 12 THE WITNESS: No. I have 157. 13 MR. KHOURY: I think that's, I 14 think that's right. 15 MR. GREENBAUM: I think the last -- 16 I think this is 158. 17 MR. KHOURY: Yeah. 18 MR. STRICKLAND: Okay. 19 Q All right. Do you recognize this 20 document, Ms. Wright? 21 A Yes. 22 Q What is this document? 23 A This is the response from Dan to a 24 simple question I asked him, and I don't 25 remember what the question was, but I remember</p>

321	<p>1 when I got this response that I thought this</p> <p>2 was way more than what I asked for. But I</p> <p>3 don't remember what I asked to start with,</p> <p>4 but.</p> <p>5 Q Now, now this, this document refers</p> <p>6 specifically to HD 105 and HD 111. Do you</p> <p>7 recall if the inquiry related specifically to</p> <p>8 those two districts given that the email has</p> <p>9 information that focuses on those two</p> <p>10 districts?</p> <p>11 A I don't recall what the question</p> <p>12 was.</p> <p>13 Q Okay. At the time, were you</p> <p>14 looking at potentially modifying Districts 105</p> <p>15 and 111?</p> <p>16 A I don't recall that to be the case.</p> <p>17 Q Just, just so, just so the record</p> <p>18 is clear on this, you don't know whether or</p> <p>19 not it was the case, or your recollection is</p> <p>20 it was not the case?</p> <p>21 A My recollection was it was not the</p> <p>22 case.</p> <p>23 (Whereupon a document was identified as</p> <p>24 Plaintiff's Exhibit 159.)</p> <p>25 Q Okay. All right. I want to move</p>	323	<p>1 familiar with was the drafting of change to</p> <p>2 her district.</p> <p>3 (Whereupon a document was identified as</p> <p>4 Plaintiff's Exhibit 160.)</p> <p>5 Q Okay. All right. I want to mark</p> <p>6 as Exhibit 160 a document at 48 -- GA2-4870</p> <p>7 and 4871, and at the top is an email from Dan</p> <p>8 O'Connor to Gina Wright dated February 28th,</p> <p>9 19 -- or 2017.</p> <p>10 A Oh, going back.</p> <p>11 Q Going way back.</p> <p>12 A I wasn't even working there in the</p> <p>13 19 somethings. Probably still in high school</p> <p>14 and college. It would have been real funny if</p> <p>15 they asked me then.</p> <p>16 Q Ms. Wright, do you recognize this</p> <p>17 document?</p> <p>18 A I need a minute to review it.</p> <p>19 Q Sure.</p> <p>20 A Okay.</p> <p>21 Q Okay. Do you recognize the</p> <p>22 document?</p> <p>23 A I'm familiar with this discussion.</p> <p>24 I don't recall the email specifically, but.</p> <p>25 Q Okay. What was the discussion?</p>
322	<p>1 on to now Exhibit 159. And at the top of it</p> <p>2 is an email from Dan O'Connor to Gina Wright,</p> <p>3 and it's at GA2-4872 and 4873.</p> <p>4 A Okay.</p> <p>5 Q Ms. Wright, do you recognize this</p> <p>6 document?</p> <p>7 A Yes.</p> <p>8 Q What is it?</p> <p>9 A An email forwarded to me from Dan</p> <p>10 to clarify the particular plan that Speaker</p> <p>11 Pro Tem wanted to use to modify her district</p> <p>12 in the 2017 redistricting proposal.</p> <p>13 Q Okay. Do you -- now, it references</p> <p>14 a conversation that below -- it talks about a</p> <p>15 conversation that happened on February 15th</p> <p>16 between Mr. O'Connor and Ms. Jones. Do you</p> <p>17 know why the two of them were talking?</p> <p>18 A I do not. I know her initial</p> <p>19 question about plans, the discussion of plans</p> <p>20 A and B, were two drafts that I had done for</p> <p>21 her related to her district.</p> <p>22 And I believe either he saw her and</p> <p>23 she asked about that, and then I don't know</p> <p>24 how the rest of this conversation came to</p> <p>25 pass. But that was the part that I was</p>	324	<p>1 A This was related to senate</p> <p>2 districts and the potential looking at the</p> <p>3 changes they might want to make between</p> <p>4 Senator Martin and that area and other Senate</p> <p>5 districts that they were looking at</p> <p>6 potentially changing.</p> <p>7 (Whereupon a document was identified as</p> <p>8 Plaintiff's Exhibit 161.)</p> <p>9 Q Okay. Thank you. I want to mark</p> <p>10 as Exhibit 162, it's an undated document, it's</p> <p>11 GA2-5093.</p> <p>12 MR. KHOURY: I'm sorry. Was that</p> <p>13 561 -- I mean 161?</p> <p>14 THE WITNESS: 161.</p> <p>15 MR. GREENBAUM: 161.</p> <p>16 A Okay.</p> <p>17 Q Do you recognize the document,</p> <p>18 Ms. Wright?</p> <p>19 A I do.</p> <p>20 Q What is it?</p> <p>21 A It's the content of a document I</p> <p>22 put together at some point. Right now I can't</p> <p>23 remember what, but I remember putting it</p> <p>24 together.</p> <p>25 Q Okay. Is this a document you</p>

325	<p>1 shared with anybody?</p> <p>2 A I would think so, but I can't</p> <p>3 recall exactly who got it.</p> <p>4 Q Would it be the sort of document</p> <p>5 you would share with legislators?</p> <p>6 A Yes, possibly. Probably.</p> <p>7 Q Would part of the purpose be to</p> <p>8 give the legislators kind of the lay of the</p> <p>9 land what was happening?</p> <p>10 A Yes, more or less. I don't</p> <p>11 quite -- I don't recall the reason behind why</p> <p>12 I created it or for what purpose or who I</p> <p>13 presented it to, but I do recall making it,</p> <p>14 and I recall the document.</p> <p>15 (Whereupon a document was identified</p> <p>16 as Plaintiff's Exhibit 162.)</p> <p>17 Q Okay. Great. I want to mark as</p> <p>18 Exhibit 162 documents from GA2-5098 to</p> <p>19 GA2-5101.</p> <p>20 A Okay.</p> <p>21 Q Do you recognize these documents,</p> <p>22 Ms. Wright?</p> <p>23 A I do.</p> <p>24 Q What are they?</p> <p>25 A Well, they weren't -- they were two</p>	327	<p>1 (Whereupon a document was identified as</p> <p>2 Plaintiff's Exhibit 163.)</p> <p>3 MR. GREENBAUM: What if we went</p> <p>4 ahead and separated the two documents. Yeah.</p> <p>5 Go ahead. And we'll call the second document,</p> <p>6 starting on 5100, Exhibit 163.</p> <p>7 (Whereupon a document was identified as</p> <p>8 Plaintiff's Exhibit 164.)</p> <p>9 Q Okay. And next I want to move on</p> <p>10 to document numbered 5094 through 5097. Do</p> <p>11 you recognize this document, Ms. Wright?</p> <p>12 A Yes.</p> <p>13 Q Okay. What is it, or what are</p> <p>14 they?</p> <p>15 A Well, again, these are two</p> <p>16 documents that didn't come together.</p> <p>17 Q Okay.</p> <p>18 A They don't go together.</p> <p>19 Q Okay. So the first document is</p> <p>20 which pages, using the numbers at the bottom?</p> <p>21 A This is the same document you</p> <p>22 showed me a minute ago, but this is just with</p> <p>23 the letterhead on it.</p> <p>24 Q Oh, okay. The document that --</p> <p>25 A Yeah.</p>
326	<p>1 separate documents. I don't recall them</p> <p>2 being -- they're not together because I</p> <p>3 think --</p> <p>4 Q Okay.</p> <p>5 A -- Dan drafted this first part. I</p> <p>6 did not know that he took minutes, but I think</p> <p>7 that was something he was in the habit of</p> <p>8 doing from when he was a committee aid.</p> <p>9 Q Okay. And that's the first two</p> <p>10 pages?</p> <p>11 A The first page or the --</p> <p>12 Q Front and back?</p> <p>13 A Yeah, and back, front and back.</p> <p>14 Q First two pages?</p> <p>15 A Yes, that's correct.</p> <p>16 Q So the second document that starts</p> <p>17 at 5100, what is that?</p> <p>18 A That's a document I prepared. We</p> <p>19 had some questions I think from the -- some of</p> <p>20 the House members from the Democrat caucus, I</p> <p>21 believe, asked for some details on what</p> <p>22 precincts were moved in which direction in</p> <p>23 that proposed map that they were looking at in</p> <p>24 2017. So these weren't -- they didn't come</p> <p>25 together. These weren't --</p>	328	<p>1 Q -- sort of gives the lay of the</p> <p>2 land.</p> <p>3 A That's why the other one didn't</p> <p>4 look quite as, the same. That was probably</p> <p>5 the rough draft.</p> <p>6 Q Okay.</p> <p>7 A This was more of the final that was</p> <p>8 put together.</p> <p>9 Q Okay.</p> <p>10 A And then this one is a summary of</p> <p>11 notes for the bill that was proposed last</p> <p>12 session, 2017, to change a few House</p> <p>13 districts. This is a summary of what that</p> <p>14 bill did, and I think it was prepared for the</p> <p>15 chairman.</p> <p>16 Q Okay. And that summary is on page</p> <p>17 5097?</p> <p>18 A Yes.</p> <p>19 Q And was this a summary that you</p> <p>20 created?</p> <p>21 A Yes.</p> <p>22 MR. GREENBAUM: Thank you.</p> <p>23 MR. KHOURY: Can we separate and</p> <p>24 mark those?</p> <p>25 MR. GREENBAUM: Sure. Why don't we</p>

329	<p>1 call the last page --</p> <p>2 THE WITNESS: Do you want to</p> <p>3 just -- this is the same as that other one</p> <p>4 anyway? I mean like --</p> <p>5 MR. KHOURY: No, it's different</p> <p>6 though. It's got the --</p> <p>7 THE WITNESS: It's got the</p> <p>8 letterhead. That's the only thing different,</p> <p>9 yeah.</p> <p>10 MR. GREENBAUM: Why don't we call</p> <p>11 the last page 165.</p> <p>12 (Whereupon documents were identified as</p> <p>13 Plaintiff's Exhibit 165 and Plaintiff's</p> <p>14 Exhibit 166.)</p> <p>15 Q Okay. So why don't we move on to</p> <p>16 166 now. And that will be document at</p> <p>17 40 -- 4614 and 46 -- through 4618.</p> <p>18 THE VIDEOGRAPHER: Mr. Greenbaum?</p> <p>19 MR. GREENBAUM: Yes.</p> <p>20 THE VIDEOGRAPHER: Just so you</p> <p>21 know, we've been going for 52 minutes.</p> <p>22 MR. GREENBAUM: Thank you. Okay.</p> <p>23 I had the time about right.</p> <p>24 Q Ms. Wright, do you recognize this</p> <p>25 document?</p>	331	<p>1 Plaintiff's Exhibit 167.)</p> <p>2 Q I want to move on now to a document</p> <p>3 that starts at GA2-4501 and goes to 4514, and</p> <p>4 it will be 167.</p> <p>5 Do you recognize the document,</p> <p>6 Ms. Wright?</p> <p>7 A Yes.</p> <p>8 Q What is it?</p> <p>9 A It's an email I sent to Cris</p> <p>10 Correia with the Attorney's General's Office.</p> <p>11 Q Okay. And what is contained in the</p> <p>12 email?</p> <p>13 A The PDF versions of the reports and</p> <p>14 maps. I think we looked at those reports</p> <p>15 earlier.</p> <p>16 (Whereupon a document was identified as</p> <p>17 Plaintiff's Exhibit 168.)</p> <p>18 Q Okay. All right. And I want to</p> <p>19 move on to now 168. It's GA2-4425 to 4439.</p> <p>20 Ms. Wright, do you recognize this document?</p> <p>21 A Give me a minute.</p> <p>22 Q Sure.</p> <p>23 A Okay.</p> <p>24 Q Do you recognize it?</p> <p>25 A I don't specifically recall the</p>
330	<p>1 A I do.</p> <p>2 Q What is it?</p> <p>3 A This is an email I sent to Michael</p> <p>4 Nix.</p> <p>5 Q And what is in the email?</p> <p>6 A A map, a stat sheet, and that</p> <p>7 summary that we just looked at on the</p> <p>8 description of the precincts that were changed</p> <p>9 in the 2017 proposed House Bill.</p> <p>10 Q And do you know why you were</p> <p>11 sending this email and that information to</p> <p>12 Mr. Nix?</p> <p>13 A Yes.</p> <p>14 Q And why is that?</p> <p>15 A Because he asked for it.</p> <p>16 Q Okay. And at the time, do you know</p> <p>17 why he was interested in it?</p> <p>18 A Yes.</p> <p>19 Q Why was he interested in it?</p> <p>20 A He worked for the governor, and the</p> <p>21 governor wanted to know what was in that bill</p> <p>22 so they could be able to review it.</p> <p>23 Q Okay. Great. Thank you.</p> <p>24 A Uh-huh (affirmative).</p> <p>25 (Whereupon a document was identified as</p>	332	<p>1 email, but I know what the documents enclosed</p> <p>2 are.</p> <p>3 Q And what are they?</p> <p>4 A These are different guidelines that</p> <p>5 were adopted by the committees and different</p> <p>6 members, I guess, had done in years past,</p> <p>7 things that had been presented and looked</p> <p>8 at --</p> <p>9 Q Okay.</p> <p>10 A -- in the committees.</p> <p>11 (Whereupon a document was identified</p> <p>12 as Plaintiff's Exhibit 169.)</p> <p>13 Q All right. I want to mark as the</p> <p>14 next document, which is 169, a series of</p> <p>15 emails that begin at GA2-4761 through 4763.</p> <p>16 Ms. Wright, do you recognize this</p> <p>17 document?</p> <p>18 A I recall emailing with her about</p> <p>19 it. I don't specifically, but, yes.</p> <p>20 Q Would you mind telling me what the</p> <p>21 page of the first number in the bottom right</p> <p>22 is?</p> <p>23 A GA2-004761.</p> <p>24 Q 47. Okay. Great. And I want to</p> <p>25 ask you, toward the bottom of the page, the</p>

333	<p>1 email that you sent on May 12th, 2017, at 2 4:14 p.m., was that your effort to try to 3 recall or to try to research going back to the 4 '90s when there had been mid-decade 5 redistrictings in Georgia? 6 A Yes, I believe so. 7 (Whereupon a document was identified as 8 Plaintiff's Exhibit 170.) 9 Q Okay. Thank you. I want to move 10 on to a document that starts with 4456 and 11 goes to 4468, and this is 170. 12 THE WITNESS: Can we go off for a 13 second and -- 14 MR. GREENBAUM: Yes. 15 THE WITNESS: -- let me ask my 16 attorney a question? 17 THE VIDEOGRAPHER: Going off video 18 record at 10:10 a.m. 19 (Proceedings in recess, 10:10 a.m. to 20 10:46 a.m.) 21 THE VIDEOGRAPHER: Back on video 22 record at 10:46 a.m. 23 MR. GREENBAUM: All right. So we 24 were -- I had shown the witness a document, 25 and she asked to have -- confer with her</p>	335	<p>1 So, Mr. Khoury, I'm asking you, 2 consistent with the judge's rule, about -- 3 that you note the conference and that you kind 4 of note the purpose and the outcome of the 5 conference. 6 MR. KHOURY: Sure. No, I don't 7 have a problem at all. 8 You were asking the witness about 9 emails with Cris Correia at the Attorney 10 General's Office, and so we had a discussion 11 about whether or not there was a privilege 12 issue. In fact, we called the AG's office to 13 get some feedback on that. 14 MR. GREENBAUM: Okay. 15 MR. KHOURY: And we are not 16 asserting the privilege as to those documents. 17 There is one document that came up 18 as Exhibit 155 with Jeff Lanier, who is in the 19 Office of Legislative Counsel, and that 20 document was inadvertently produced and is 21 subject to the privilege. We will assert the 22 attachment is not, and so only the cover email 23 we are asserting the privilege to and would 24 ask to claw that back. 25 MR. GREENBAUM: Which I'm fine with</p>
334	<p>1 counsel. And this happened at 10:10, and the 2 witness came back at 10:40. Counsel came back 3 at 10:45. 4 It's a very -- I don't know what 5 happened in the conference, but the judge has 6 some specific rules about conferences during 7 depositions. 8 It says counsel and the 9 witness/client shall not engage in private 10 off-the-record conferences during depositions 11 or during breaks regarding any of counsel's 12 questions or witness's answers except for the 13 purpose of deciding whether to assert the 14 privilege. 15 Any conferences that occur pursuant 16 to or in violation of this rule are proper 17 subject for inquiry by deposing counsel to 18 ascertain whether there's been any witness 19 coaching and, if so, what. 20 Any conferences that occur pursuant 21 to or in violation of this rule shall be noted 22 on the record by the counsel that participate 23 in the conference. The purpose and outcome of 24 the conference shall also be noted on the 25 record.</p>	336	<p>1 as long as, as long as sort of the timing of 2 this, that on March 9th the document was 3 provided, that there's no -- I'm fine with 4 taking back 4370 and 4371 as long as that fact 5 in terms of March the 9th is undisputed. 6 MR. KHOURY: I think it's 7 undisputed, and I don't think we would be 8 asserting the privilege as to the date. 9 MR. GREENBAUM: Okay. 10 MR. KHOURY: Just the contents of 11 the communication. 12 MR. GREENBAUM: Okay. All right. 13 MR. KHOURY: Okay. 14 MR. GREENBAUM: Thank you. So 15 we'll go back to the questioning. 16 Q I only have a couple of questions 17 left, and it's with respect to the document 18 that we just marked as 170. And I really want 19 to sort of focus on the first part of the 20 document, the first paragraph of the document 21 or the first two paragraphs, the first email. 22 Ms. Wright, you state that "split 23 precincts result in an estimate of the number 24 of voters that are based on how it allocates 25 to the amount of population there." Correct?</p>

337	<p>1 A That's what this says, yes.</p> <p>2 Q And you -- and that is consistent</p> <p>3 with your position that, when it comes to</p> <p>4 political data and when it comes to</p> <p>5 registration data, that that's the case?</p> <p>6 A Yes.</p> <p>7 Q Okay. I don't -- oh, and do you</p> <p>8 recognize the document?</p> <p>9 A Yes.</p> <p>10 Q What is it?</p> <p>11 A An email conversation between</p> <p>12 myself and Cris Correia at the Attorney's</p> <p>13 General's Office.</p> <p>14 MR. GREENBAUM: Okay. Thank you.</p> <p>15 I don't have any further questions.</p> <p>16 MR. KHOURY: Okay. We're -- I have</p> <p>17 nothing. We've already discussed the</p> <p>18 privilege issues.</p> <p>19 MR. GREENBAUM: Okay. I don't know</p> <p>20 if other Plaintiffs' counsel has any</p> <p>21 questions. I don't know if she's on.</p> <p>22 Are you on from Perkins Coie? If</p> <p>23 you are, you're muted right now, and we can't</p> <p>24 hear you.</p> <p>25 Okay. I think we're done.</p>	339	<p>1 I, GINA H. WRIGHT, Deponent,</p> <p>2 do hereby certify that I have read the</p> <p>3 foregoing deposition, and the same is a true</p> <p>4 and accurate transcript of my testimony, except</p> <p>5 for the changes listed below, if any.</p> <p>6 PAGE/LINE/CHANGE REASON</p> <p>7 _____</p> <p>8 _____</p> <p>9 _____</p> <p>10 _____</p> <p>11 _____</p> <p>12 _____</p> <p>13 _____</p> <p>14 _____</p> <p>15 _____</p> <p>16 _____</p> <p>17 _____</p> <p>18 _____</p> <p>19 _____</p> <p>20 If additional space is needed, please attach</p> <p>21 separate sheet(s) and indicate number of</p> <p>22 additional page(s) here: _____</p> <p>23 _____</p> <p>24 GINA H. WRIGHT, Deponent</p> <p>25 This ____ day of _____, 20 ____.</p> <p>Donovan Reporting, PC FAX: 770-428-5801</p> <p>237 Roswell Street Marietta, GA 30060</p> <p>Date of Deposition: 1-25-2018 CR: JM</p>
338	<p>1 MR. KHOURY: All right. Very good.</p> <p>2 MR. GREENBAUM: Thank you.</p> <p>3 THE VIDEOGRAPHER: Going off the</p> <p>4 video record at 10:50 a.m.</p> <p>5 (Proceedings adjourned, 10:50 a.m.)</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	340	<p>1 CERTIFICATE OF COURT REPORTER</p> <p>2 STATE OF GEORGIA</p> <p>3 COUNTY OF COBB</p> <p>4 I hereby certify that the foregoing</p> <p>5 deposition was reported as stated in the</p> <p>6 caption, and the questions and answers thereto</p> <p>7 were reduced to writing by me;</p> <p>8 That the witness's right to read and</p> <p>9 sign the deposition was reserved;</p> <p>10 That the foregoing pages 288 through</p> <p>11 341 represent a true, correct, and complete</p> <p>12 transcript of the evidence given on the</p> <p>13 above-referenced date by the witness, GINA H.</p> <p>14 WRIGHT, who was first duly sworn by me;</p> <p>15 That I am not of kin or counsel to any</p> <p>16 of the attorneys or parties in this case.</p> <p>17 I do hereby disclose pursuant to</p> <p>18 Article 10.B. of the Rules and Regulations of</p> <p>19 the Board of Court Reporting of the Judicial</p> <p>20 Council of Georgia that I am a Georgia</p> <p>21 Certified Court Reporter; that I am an employee</p> <p>22 of Donovan Reporting PC; that Donovan</p> <p>23 Reporting PC was contacted by the attorney</p> <p>24 taking the deposition to provide court</p> <p>25 reporting services for this deposition; that I</p>

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1 am not taking this deposition under any
2 contract that is prohibited by OCGA 15-14-37(a)
3 and (b) or Article 7.C. of the Rules and
4 Regulations of the Board; and I am not
5 disqualified for a relationship of interest
6 under OCGA 9-11-28(c).

7 There is no contract to provide
8 reporting services between myself or any person
9 with whom I have a principal and agency
10 relationship nor any attorney at law in this
11 action, party to this action, party having a
12 financial interest in this action, or agent for
13 an attorney at law in this action, party to
14 this action, or party having a financial
15 interest in this action. Any and all financial
16 arrangements beyond my usual and customary
17 rates have been disclosed and offered to all
18 parties.

19 This 1st day of February 2018.

20

21



JOEL P. MOYER, CCR 2745
Certified Court Reporter

22

23

24

25

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