

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; 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

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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14 contained in a separate volume of exhibits and
15 not attached to the transcript.)

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November 20, 2017

9:37 a.m.

(Whereupon the reporter provided a written disclosure to all counsel pursuant to Article 8.B. of the Rules and Regulations of the Board of Court Reporting.)

THE VIDEOGRAPHER: We are now on video record. This is the beginning of file number one. The date is November --

MR. WILL: 20th.

THE VIDEOGRAPHER: -- 20th, 2017.
The time is 9:37 a.m.

THE COURT REPORTER: Swear in the witness?

MR. GREENBAUM: Yes.

GINA H. WRIGHT,
being first duly sworn, was examined and testified as follows:

EXAMINATION

BY MR. GREENBAUM:

Q Good morning, Ms. Wright.

A Good morning.

Q I introduced myself to you a few minutes ago. My name is Jon Greenbaum. I'm one of the attorneys representing the Georgia

1 NAACP in the case involving the Georgia
2 redistricting plan. Good morning.

3 A Good morning.

4 Q Have you ever had your deposition
5 taken before?

6 A Yes, I have.

7 Q On how many occasions?

8 A Two or three.

9 Q Two or three? Were they -- did they
10 all relate to professional, your job?

11 A Yes.

12 Q Could you describe each time you've
13 had your deposition taken?

14 A The most recent was a local
15 redistricting case where I was the technical
16 expert for a federal judge. That was the
17 Fayette County case.

18 Very further back, I think the
19 Larios case in 2004. And I'm not sure if there
20 were any others.

21 Q Okay. And in the Fayette County
22 case, is it correct that you didn't represent
23 any party, that the judge had appointed you as
24 an, as an expert --

25 A That's correct.

1 Q -- for the maps? For the remedy in
2 the case?

3 A Yes.

4 Q And then in the Larios county case,
5 were you deposed on -- were you representing
6 the part of the State in that case, or what was
7 your role?

8 A I was a member of the staff, and the
9 staff that worked on various proposals were all
10 deposed.

11 Q And that had to do with statewide
12 redistricting in Georgia?

13 A Yes.

14 Q Which plans were at issue in Larios?

15 A The State House and State Senate.

16 Q And what was your role with respect
17 to the State House plan?

18 A As staff, we worked with various
19 members of the General Assembly. My role was
20 pretty minimal at that point.

21 Q So you wouldn't consider yourself to
22 be a primary map drawer of those plans?

23 A In 2004?

24 Q Yes.

25 A No.

1 Q Okay. All right. So just to
2 refresh your recollection about some of the
3 rules of deposition, one of the things to note
4 is that everything that you say and I say and
5 the other people in the room and on the phone
6 say will be recorded by a stenographer here as
7 well as in this case we're being videotaped as
8 well. Do you understand that?

9 A Yes, I do.

10 Q And you understand you're under
11 oath?

12 A Yes.

13 Q And at the end of -- at the end of
14 the day, the court reporter will come up with a
15 transcript. You'll have the opportunity to
16 review the transcript and --

17 MR. WILL: She would like to read
18 and sign.

19 MR. GREENBAUM: Okay.

20 Q And note that if you have -- if you
21 make any changes to the transcript, that's
22 something that I can note as well later on in
23 the case or any of my co-counsel. Do you
24 understand that?

25 A Yes.

1 Q One thing you're doing a good job
2 of so far is we're not talking over each
3 other. It's very important in terms of
4 getting a clear record that I finish asking
5 the question, even if you think you know where
6 I'm going, before you answer and that I let
7 you finish your answer before I ask the next
8 question. Do you understand that?

9 A Yes.

10 Q Okay. Is there any reason why your
11 deposition can't be taken today?

12 A Not that I know of.

13 (Whereupon a document was identified
14 as Plaintiff's Exhibit 1.)

15 Q Okay. Great. So I'm going to show
16 you a document or, actually, I'm going to show
17 you -- I'm going to show you some documents
18 that were produced to us from Mr. Will last
19 Friday. And I'm going to be asking you
20 questions about these documents as a whole in
21 a couple minutes, and I'm also going to be
22 asking you during the course of the deposition
23 about a number of the documents that are
24 contained within that.

25 And I want to go back for a second

1 and I want to mark as Exhibit 1 a document
2 entitled Subpoena to Testify at a Deposition in
3 a Civil Action.

4 MR. WILL: Thank you.

5 Q Ms. Wright, do you recognize this
6 document?

7 A Yes.

8 Q Did you receive this document at
9 some point in the past?

10 A Yes.

11 Q Okay. And you notice that on -- if
12 you look at the, the top part of the page, it
13 has some page numbers on it. If you go to page
14 seven, it lists a series of deposition topics.
15 And can you talk about your knowledge of topic
16 one, which involves the drawing of the
17 redistricting plans considered or enacted by
18 the Georgia Legislature in Act number 251 in
19 2015, HB 566, and HB 515 in 2017.

20 A I'm not sure. I don't know what you
21 want me to say.

22 Q Okay.

23 MR. WILL: Nor did I. I was going
24 to say --

25 Q Okay. Sure. What was, what was

1 your role with respect to the drawing of the
2 redistricting plan in 2015?

3 A I worked with members of the General
4 Assembly, primarily with the chairman of our
5 House committee, to create districts as they,
6 you know, were looking to see what they, you
7 know, might look like as a part of what would
8 make up that bill.

9 Q And did you use a particular
10 redistricting software in 2015?

11 A Yes. Our office uses Maptitude for
12 redistricting.

13 Q Okay. And in terms of who, who else
14 other than you actually physically used the
15 Maptitude program in terms of drawing the
16 plans?

17 A At any time or specifically for
18 this?

19 Q For what ended up being HB 566.

20 A Primarily, me. My staff may have
21 met with members to look at options, but as it
22 related to what was final and what was put into
23 the bill, that would be me.

24 Q Okay. At any time in the process in
25 2015, did anybody present any maps to you?

1 A I don't recall that happening.

2 Q Okay. And going on to 2017, what
3 was your role in terms of the maps that were
4 part of HB 515 in 2017?

5 A I would say my role was the same.
6 We work with members to, you know, draw a draft
7 of a district, see what we can do, if that's
8 something they want to do or not.

9 Q With respect to either HB 566 or HB
10 515, were there any alternative maps that you
11 drew at any time?

12 A As far as for the bill as a whole or
13 exactly what --

14 Q At any point during the process,
15 were you, were you coming up with drafts of
16 things that you were showing to members or to
17 your staff?

18 A Typically, when we work on a plan
19 like this that is not a map to redraw the
20 entire state, we work with, you know, a member
21 and whatever their criteria are, and we work on
22 it and work on it and work on it. So there's
23 not a multiple string of alternate plans. It's
24 a process by which we create what it is that
25 they're looking for, so there's not a trail of

1 alternate plans.

2 Q So during this process, I take it
3 that you probably -- let's take the 2015 plan.
4 You didn't drop -- draw the map in one, the
5 revised map, in one sitting, did you?

6 A No.

7 Q During the course of time, do you
8 save drafts of what you're working on?

9 A It depends.

10 Q And --

11 A Typically, I would say no. It just,
12 these particular changes that were done were
13 usually very small, minimal changes that were
14 given -- I was given criteria. If I could try
15 to draw something that would be what that
16 member was looking for, then I work within that
17 particular area to do that.

18 So I don't have, like I said before,
19 multiple plans because most of these changes
20 were not -- if there was another -- like in
21 another example, had there been a wide sweep
22 change of, you know, totally different
23 variation, then, yes, I would say those are
24 different plans, but I did not have that happen
25 during this process.

1 Q Were there any -- so at no time did
2 you save a version and then you went on and
3 started a new version or revised version?

4 A There could have been one or two
5 versions like that for a specific area, not for
6 the whole bill as a whole, no.

7 But if in one area there were two
8 options that they looked at, then there may be
9 two different plans that would be, basically
10 just that area to those two districts or
11 however many districts, there would be a
12 different version for that.

13 Q And are there particular -- do you,
14 do you create a system of organizing plans so
15 that when you go back to when you're working on
16 a set of changes related to a plan that they're
17 all kept in some electronic folder?

18 A The organization in our system is by
19 member numbers.

20 Q Okay.

21 A So it's through -- whatever that
22 particular member works on, work is saved into,
23 into their library.

24 Q Okay. So if you, if you were -- if,
25 let's say, the house member in 111 asked you to

1 make some proposed changes to 111, you would
2 have, you would have a series of -- if they
3 existed, you would have a series of files all
4 related to 111?

5 A Yes. If they existed, I would have
6 a plan perhaps named whatever I named it with a
7 one or a two or whatever in his particular
8 folder that would be designated as his work
9 which would be private for him.

10 Q Okay. And let's say, let's say --
11 let's take 111 again as an example, and let's
12 say that that member wanted to have changes in
13 2015 and wanted to have changes again in 2017
14 and there were multiple drafts of that. Would
15 that all be -- would those drafts all be under
16 the 111 folder, or would there be a separation
17 based on what year it was?

18 A It would all be under 111.

19 Q Okay. I want to move on next and
20 ask you -- you mentioned a couple minutes ago
21 that you -- you referenced redistricting
22 criteria and taking into account redistricting
23 criteria when you're drawing a plan.

24 Can you tell me what the
25 redistricting criteria was with respect to the

1 2015 house plan?

2 A Sure. All redistricting that we
3 ever do is to comply with all state and federal
4 law, which would include the Voting Rights Act.
5 It would also include criteria such as
6 contiguity, compactness, keeping
7 counties/precincts whole as much as possible,
8 communities of interest, if that's something
9 that we can take into account. Further down
10 would be incumbency. Those types of issues are
11 always kind of at the -- on the list but lower
12 down.

13 Q And with respect to the changes in
14 2015, what were you told that house members
15 wanted to do?

16 A It varied in terms of which house
17 member I was talking to --

18 Q Okay.

19 A -- or who, you know, had spoken with
20 our chairman. So it would have to -- you would
21 have to be specific on --

22 Q Sure. Let's start with the, with
23 the changes in Gwinnett County 104 and 105.
24 What were you told the House members wanted to
25 achieve?

1 A They were looking for a political
2 advantage to see if there was any way to, 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 Efstration.

17 Q And why would you have probably
18 spoken to Representative Efstration?

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

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

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

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?

1 A That is part of -- when we create a
2 precinct layer that we work on, we have a
3 precinct file we update every two years to
4 correspond to the general election, and that
5 data is a part of that file. So it is built in
6 to our political data layer that we can use in
7 our system, so it is there. It can be looked
8 at, yeah, sure.

9 Q So what, what political, what
10 political data do you look at in your system on
11 Maptitude?

12 A When we pull in political data that
13 we get from the Secretary of State's office,
14 what we are doing is matching that to -- those
15 precinct codes to what precinct codes we have
16 in our geographic layer that we correct with
17 the counties to accurately represent what they
18 have for their voting precincts so we can keep
19 that up to date. For an overarching reason is
20 to keep us up with when we have to update with
21 the Census Bureau every decade. That keeps us
22 on pace.

23 What we do is pull files from that.
24 The data that we use is always statewide
25 contested races, and we pull those in to match

1 with the precincts because those are races that
2 are across the board for the entire state. So
3 it's a balanced look at how the state voted as
4 a whole by precinct.

5 Q Okay. I'm going to come back to
6 this a little bit later on in the, in the
7 deposition. I want to move now to District 111
8 in 2015. Who did you have conversations with
9 in terms of District 111?

10 A Throughout the process or at what
11 point?

12 Q At any point during the process.

13 A I spoke with all the members there
14 that were involved in having their district
15 affected by any change. So that would be -- do
16 you want me to name them, or do you know?

17 Q Why don't you go ahead and name them
18 for the record.

19 A Representative Rutledge.
20 Representative Welch.

21 Q Oh, and sorry to interrupt you.
22 When you say their names, can you say the
23 district as well that they represent?

24 A Okay. Representative Rutledge is
25 109. This is like a quiz. Representative

1 Welch is 110. Representative Strickland is
2 111. Representative Knight was 130.
3 Representative Yates was 73. And I would be
4 certain that I spoke with Chairman Nix on that
5 too, and his number was 69, I think.

6 Q Okay. And in, in communicating with
7 these representatives, what did they tell you?
8 What did they tell you that they wanted to try
9 to accomplish or avoid? Let's start with, so
10 you mentioned before trying to maintain -- that
11 the purpose of this was trying to maintain
12 political advantage; correct?

13 A Yes.

14 Q And would it be fair to say that the
15 goal was for Representative Strickland in 111
16 to be able to maintain his seat?

17 A Yes.

18 Q And Representative Yates, Rutledge,
19 Welch, and Knight are also white Republicans
20 who have portions of their districts in Henry
21 County; correct?

22 A Correct.

23 Q And was the goal to -- and, and the
24 plan that was passed in 2015 affected all five
25 of those districts; correct?

1 A Correct.

2 Q And would it be fair to say that
3 what you were trying to also accomplish in
4 improving the likelihood that Representative
5 Strickland would be reelected would be to not
6 do any harm in terms of the likelihood that
7 Representatives Yates, Rutledge, Welch, and
8 Knight would not be reelected?

9 A I think I understood that question,
10 and I think that's yes, if you're saying we
11 didn't want to politically harm those other
12 districts as well. Is that what you're asking?

13 Q Uh-huh (affirmative).

14 A Yes, that's correct.

15 Q And in doing so, did you look at
16 political data?

17 A Yes.

18 Q Did you also look at racial data?

19 A Racial data, when I worked on both
20 of these districts, was not the first thing
21 that I ever looked at. It was something that I
22 did consider down the line, but all of these
23 criteria were, you know, in a particular order
24 that I usually review when I'm working on
25 something.

1 Since my objective was to make these
2 districts, if at all possible anyway, better
3 for these incumbents to get reelected, then
4 that political data was my primary objective to
5 look at. To say that I never looked at race
6 data, no, I did eventually look at it to make
7 sure that I did not do significant harm in that
8 respect as well. So, yes, I did look at race
9 data.

10 Q What do you mean by significant harm
11 in that respect?

12 A Well, throughout my years of drawing
13 maps, obviously, you wouldn't want to do
14 anything that would make a significant change
15 for a district. These districts were in the
16 30-percent range, I would say, for their
17 African-American population, so you wouldn't
18 want to take it down to, say, 10 percent,
19 obviously. There's -- that's clearly doing
20 something, you know, moving up, people who live
21 in that area, too much.

22 But any time you make a change to a
23 district in order to make changes in the
24 population, you're going to make changes in the
25 numbers, so you want to just review those

1 numbers and make sure they are comparable to
2 where you started from.

3 Q You also didn't want to -- you also
4 didn't want to make the districts more black;
5 correct?

6 A I'm sorry?

7 Q You also didn't want to make the
8 district, any of the districts, let's say,
9 40-percent black?

10 A That was never told to me.

11 Q Is that something that you
12 considered when you're drawing these plans?

13 A I'm not sure I understand exactly
14 what you're asking me.

15 Q Sure. Well, let me ask a different
16 question. Is there any correlation between
17 race and partisanship in Georgia?

18 A There have been studies of that, and
19 they seem to show that there is some
20 correlation. I don't have any evidence in my
21 hand that I can say this defines it completely.
22 It's all speculation.

23 Q What's your understanding of what
24 that correlation is?

25 A Well, if you look across any of the

1 races locally, you can see that the districts
2 that are majority-minority districts tend to
3 elect Democratic candidates.

4 Q Okay. And the districts that are,
5 let's say, 65 percent or more white tend to
6 elect Republican candidates?

7 A On the current map, that would
8 probably be true.

9 Q Okay. And you were aware of that
10 when you redrew the map in 2015; correct?

11 A Yes.

12 Q Okay. Now I want to move on to
13 Exhibit B, which is on page eight of -- I'm
14 sorry. Exhibit B of Exhibit 1, so page eight
15 of Exhibit 1, the very next page. Do you see
16 where I'm looking at?

17 A I do.

18 Q Okay. And these were documents that
19 you were or that your office was asked to
20 produce with respect to this deposition. Is
21 that your understanding?

22 A Yes.

23 Q And what did, what did your office
24 do to look for documents that would be
25 responsive to Exhibit B?

1 A For the first portion with the shape
2 files, we went through the libraries of the
3 affected members, anything we had related to
4 these two bills that were considered or
5 enacted, saved them to a folder so they could
6 be burned to a CD.

7 Second portion, I contacted my
8 staff, had them review their emails for
9 anything related to what this asks for within
10 Gwinnett or Henry counties for the House
11 districts and the members and anyone else who
12 may have asked for anything related to that
13 since that date, had them save them to a
14 folder, burn them to a CD.

15 Q Okay. Oops. Just a second.

16 All right. Now I'm going back to
17 that other stack of documents that I showed you
18 earlier.

19 A Okay.

20 Q Do you have any sense in terms of
21 what the volume was of documents that you
22 provided with respect to Exhibit B, question
23 two?

24 A What do you mean in terms of volume?

25 Q Well, in front of you, you've got

1 about 200 pages worth of documents that I'm
2 trying to, trying to figure out how to get
3 confirmation that, that that is what you
4 provided to your counsel to provide to us.

5 A I never printed it, so I wouldn't
6 know --

7 Q Okay.

8 A -- what it would constitute in terms
9 of a paper stack, so, I mean, do you want me to
10 go through the whole stack?

11 Q Probably, probably not. I don't
12 think that would be very good use of your time.
13 I might ask your counsel a question about it
14 during, during the break.

15 A Okay.

16 Q During the course of the deposition,
17 I'm going to be pulling -- I'm going to ask you
18 to pull out some of the pages from that stack
19 as we get into the deposition, and I'm asking
20 you questions --

21 A Okay.

22 Q -- related to some of the
23 communications that were in there.

24 In terms of going back to number one
25 in Exhibit B, do you recall there being any

1 alternative plans in the folders of the
2 legislators that you burned to the CD?

3 A There were some, yes.

4 (Whereupon a document was identified as
5 Plaintiff's Exhibit 2.)

6 Q Okay. All right. All right. I'm
7 going to go back in time a little bit and go
8 through your professional history now. I'm
9 going to mark as Exhibit 2 what appears to be
10 your LinkedIn profile; is that correct?

11 A That's correct.

12 Q And so you went to work doing
13 redistricting out of college?

14 A Yes.

15 Q And at the time you started doing
16 redistricting for Georgia, where were you
17 working out of? Were you working in Atlanta?

18 A Yes.

19 Q And were you working for the Georgia
20 General Assembly at the time?

21 A Yes. At the time our office was
22 contracted through the University of Georgia;
23 however, we served the Georgia General
24 Assembly, so our office was in the same place
25 that it is now.

1 Q Okay. So your office hasn't moved
2 from 2000 to 2017?

3 A No.

4 Q And you mentioned before that it was
5 contracted through the University of Georgia.
6 Was there a component of the University of
7 Georgia that the office was part of?

8 A Yes. They were -- we were
9 underneath the division called ITOS,
10 Information Technology Outreach Services, and
11 then sometime during those years, I couldn't
12 tell you which year it was, the whole ITOS
13 division was moved under the Vincent Institute
14 of Government.

15 Q Now, at the time you went to, first
16 went to work in the Reapportionment Office, who
17 was the executive director at the time?

18 A Linda Meggers.

19 Q And who else worked in the office
20 when you were first there?

21 A Let's see. Joe Stanton, Rob
22 Strangia, Shantée El, Angela Kennedy, Heather
23 Hammond.

24 Q Okay. And Mr. Stanton, what was his
25 role in the office?

1 A He was the assistant director.

2 Q And is it correct to say that
3 Ms. Meggers and Mr. Stanton don't work in the
4 office anymore?

5 A That's correct.

6 Q Do you recall about at what point
7 Ms. Meggers left?

8 A She left in January of 2005.

9 Q And how about Mr. Stanton?

10 A I would say it was summer of that
11 same year.

12 Q And when Ms. Meggers left, who
13 became the executive director of the office?

14 A We had a time period where we really
15 didn't have one for a while, but following
16 that, when they hired someone, Shantée El was
17 named the director.

18 Q And is it correct that Ms. El
19 doesn't work in the office anymore?

20 A That's correct.

21 Q Do you recall when about she left?

22 A I think it was the end of 2012.

23 Q Was there a period of time in which
24 the executive director became Jimmy McDonald?

25 A Yes.

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?

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

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

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.

1 In the House, I believe it was in three areas.

2 Q Okay. All right. Next on your
3 profile it says that you "Maintained a current
4 statewide precinct file for all 159 counties in
5 Georgia through frequent contact with county
6 election supervisors."

7 Is that something that you did in
8 your role as a redistricting services
9 specialist?

10 A Yes.

11 Q And then it says you "Coordinated
12 the Block Boundary Suggestion Program for the
13 US Census Bureau in preparation for the 2010
14 census for Georgia." Did you do that?

15 A Yes.

16 Q And what did that entail?

17 A We worked through all 159 counties
18 using the geography provided from the Bureau to
19 get down to the geographic layer in the blocks
20 and make corrections where there needed to be
21 corrections within each county. It's very
22 technical and very detailed.

23 We would find areas where it would
24 be on a railroad, it would jump off the
25 railroad onto something else, the block

1 boundary, that is, and then it would come back
2 onto the railroad. So we wanted to make a
3 continuous feature -- make corrections so that
4 we would have continuous features. Features
5 that are no longer there, we would want to
6 remove, you know, such as a dried up creek bed
7 or a railroad that was destroyed or whatever,
8 things like that.

9 Q And so you would take that
10 information that, that you received from the
11 counties and suggested the census changes in
12 the census blocks?

13 A Right. Most of the information
14 isn't necessarily received from the counties.
15 If we, if we had something that the county had
16 told us, this is here and we need to have this
17 creek -- this river is here and we'll not be
18 able to use it, then, yes, we would definitely
19 mark those to be changes to the block lines.

20 Some of it was just us working down
21 to that level and looking for geographical
22 differences and things that needed to be
23 corrected.

24 Q And then what is the -- what's a
25 VTD?

1 A A VTD is a voting district as
2 defined by the Census Bureau. For us, it
3 corresponds with voting precincts.

4 We are -- we submit to the Bureau
5 whatever files we want to use for our VTDs. We
6 try to submit the most recent file that we have
7 so that when that is -- the data is allocated
8 to those VTDs that it is at least as close to
9 the most current precinct layer that we have at
10 that point in time.

11 But they do not change throughout
12 the decade. The VTDs from the Bureau are still
13 the VTDs as they are in the year that ended in
14 zero for the file.

15 Q So the VTDs don't change?

16 A Correct.

17 Q After the, after the decade begins?

18 A Correct.

19 Q So the VTD in 2010 would be the same
20 as the VTD in 2016?

21 A If you're referring to the census,
22 how the Census Bureau defines it, yes.

23 Q But one of the things that may
24 happen in Georgia is that election officials
25 may want to adjust the boundaries of a precinct

1 in between censuses; correct?

2 A Definitely.

3 Q Do you know, with respect to
4 Districts 105 and 111, whether there have been
5 any changes in the precinct boundaries since
6 2010?

7 A I can't say for certain.

8 Q You don't recall any?

9 A I'm not sure. I work with so many
10 of them and we do this every two years, so I
11 can't pinpoint.

12 As far as the most recent two years,
13 no, I don't believe that either Henry or
14 Gwinnett have made any changes to their
15 precincts since that's the most recent file
16 that I worked on was the '16 file.

17 Q Okay. I just want to make sure I
18 understand the timing. So are you saying there
19 have been no changes since 2016 for sure, or
20 are you saying there have been no changes since
21 2014?

22 A With -- I can say with certainty
23 that I don't believe Gwinnett or Henry have
24 made any precinct changes since '16 -- or,
25 actually, what's -- leading up to '16, so I

1 guess from -- since '14 leading up to the '16
2 file, they did not have any changes.

3 But it is possible that they made
4 changes prior to that. The file would have
5 been updated in '10, '12, '14, '16, et cetera,
6 every two years.

7 Q You brought some maps with you
8 today.

9 A Yes.

10 Q Would you mind bringing the maps
11 out?

12 A Sure. Where would you like me to
13 put them?

14 Q Why don't you go ahead and let's see
15 if we can get them to fit on the table.

16 A They're large.

17 Q And I very much appreciate you
18 creating these maps or bringing these maps to
19 the deposition.

20 Okay. So the first map says
21 Gwinnett County House Districts - as passed
22 2012; is that correct?

23 A Yes.

24 MR. GREENBAUM: Why don't we go
25 ahead and mark this one as Exhibit 3.

1 (Whereupon a document was identified as
2 Plaintiff's Exhibit 3.)

3 (Whereupon off-the-record discussions
4 ensued.)

5 Q And, Ms. Wright, could you describe
6 what Exhibit 3 is?

7 A Exhibit 3 is a map of the State
8 House districts as they were drawn in 2012 of
9 Gwinnett County and all the House districts
10 within it and some of the surrounding.

11 Q And in the bottom right-hand corner,
12 there, there's a set of layers that are used
13 for the map; is that correct?

14 A Yes.

15 Q And those set of layers are things
16 that are items that show up on the map itself;
17 correct?

18 A Correct.

19 Q And could you list what the layers
20 are for this particular map?

21 A It says map layers, districts,
22 census place, river, railroad, streets,
23 freeway, highway, VTD 2014, county, and then it
24 has a little mileage thing.

25 Q Okay. Thank you.

1 A Uh-huh (affirmative).

2 (Whereupon a document was identified as
3 Plaintiff's Exhibit 4.)

4 Q We'll be coming back to this.

5 I want to go ahead and for now mark
6 each map, so I want to go next to the next map
7 and mark as Exhibit 4 Gwinnett County House
8 districts - as passed 2015.

9 Do you recognize this map,
10 Ms. Wright?

11 A Yes.

12 Q And could you explain what this map
13 is?

14 A This is a map of the State House
15 districts as they were following the 2015 map
16 changes of the State House districts of
17 Gwinnett County and a little bit of the
18 surrounding.

19 Q Okay. And so if somebody wanted to
20 look at the changes in District 105 between
21 2012 and 2015, one of the things that they
22 could do is look at the -- at Exhibit 3 and
23 Exhibit 4 and see how they are different?

24 A Sure.

25 (Whereupon a document was identified as

1 Plaintiff's Exhibit 5.)

2 Q All right. Why don't we go, go on
3 to the next map. I want to mark as Exhibit 5 a
4 document entitled Henry County House
5 Districts - as of 2012.

6 Do you recognize this document,
7 Ms. Wright?

8 A Yes.

9 Q And what is this document?

10 A This is a map of the Georgia House
11 districts as of 2012. It's Henry County, all
12 the districts within, and some of the
13 surrounding.

14 Q Okay. Thank you.

15 A You're welcome.

16 (Whereupon a document was identified as
17 Plaintiff's Exhibit 6.)

18 Q Why don't we go ahead and move on to
19 Exhibit 6. Exhibit -- I just marked as
20 Exhibit 6 Henry County House Districts - as
21 passed 2015.

22 Ms. Wright, do you recognize this
23 document?

24 A Yes.

25 Q And what is this document?

1 A This is a map of the State House
2 districts following the changes in 2015 of
3 Henry County, the districts that are contained
4 within, and some of the surrounding.

5 Q Okay. And, again, if you wanted to
6 see the changes in District 111 between 2012
7 and 2015, one of the things that you could do
8 is compare Exhibit 5 and Exhibit 6; is that
9 correct?

10 A You could do that.

11 Q Okay. Thank you.

12 A You're welcome.

13 (Whereupon a document was identified
14 as Plaintiff's Exhibit 7.)

15 Q We can actually maybe put all the
16 maps back on top just so that it will give you
17 room to maneuver.

18 Thank you. I wanted to mark as
19 Exhibit 7 a document entitled Georgia General
20 Assembly, Welcome to the Legislative &
21 Congressional Reapportionment Office.

22 Ms. Wright, do you recognize this
23 document?

24 A I do.

25 Q What is it?

1 A It appears to be a printout of our
2 web page.

3 Q Okay. And I had asked you about
4 previous staff before. I want to ask you some
5 questions about the current staff. And I guess
6 the first thing to note is that you are
7 currently the executive director; correct?

8 A Correct.

9 Q And you became the executive
10 director at some point in 2012?

11 A Yes.

12 Q And then it lists four other people
13 on the staff. Could you -- and the first is
14 Tonya Cooper. Can you describe what Ms. Cooper
15 does?

16 A She's our office manager.

17 Q And then how about Mr. Knight?

18 A He's a redistricting services
19 specialist.

20 Q And what does -- and that's -- that
21 was similar to the job that you had previously?

22 A Yes.

23 Q How about Mr. O'Connor, Dan
24 O'Connor?

25 A Dan is a data specialist,

1 redistricting data specialist.

2 Q Prior to Mr. O'Connor, was there a
3 data specialist that worked in the office?

4 A No.

5 Q So this was, this was a role that
6 was created during your tenure as executive
7 director?

8 A No, not specifically. Dan has been
9 on the staff off and on, I guess, mostly since
10 2005.

11 Q Okay.

12 A The title, we may have streamlined the
13 title a certain way, but that's -- he's always
14 kind of done what he's done in the office,
15 which is he knows the data very well.

16 Q And when you talk about the data,
17 what do you mean specifically?

18 A Geography, political trends,
19 election returns and results, pretty much
20 anything, history.

21 Q How about demographic changes?

22 A To some degree.

23 Q And then we mentioned Mr. Strangia
24 before.

25 So I take it at the, at the -- right

1 before there's a census, the office is probably
2 pretty busy in preparation for the data that's
3 going to come out for the census; correct?

4 A It's a process that is spread out
5 over several years leading up to the census, so
6 it's not too crazy right, right then, but it
7 is -- over time, we do a lot of things.

8 Q Okay. And then after the census
9 comes out, the office is extremely busy because
10 it's drawing plans for the Congressional State
11 House and State Senate; correct?

12 A Well, initially, we're bringing the
13 data in and putting the data to the current
14 maps and analyzing what the data shows for the
15 state.

16 Q And the office also draws maps when
17 requested for local jurisdictions?

18 A That's correct.

19 Q And the bulk of the redistricting
20 is, is done in the first two years after the
21 census comes out? Is that fair to say?

22 A I'd say that's fair to say.

23 Q What are the main thing that the
24 office does? Let's say -- let's take this
25 decade. What are the main things the office

1 does -- has done between, let's say, 2013 and
2 2017?

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.

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.

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.

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

1 any kind, they order maps from our office, so
2 we're doing requests for those things.

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.

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.

14 What, what does that joint report
15 consist of?

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.

24 Q And why -- what's the purpose of
25 creating that report?

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.

9 Q And then the next one that's listed
10 is City Districts. Could you describe what,
11 what report that is?

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.

18 Q Okay. And why is that report
19 created?

20 A It's just a useful reference.

21 Q And then underneath that, it says
22 Joint County Districts 2015. What is that
23 report?

24 A That's the same kind of report as
25 the city report except it's just for the

1 county, which districts are a part of those
2 delegations for each county.

3 Q And you referenced before the
4 importance of county delegations in terms of
5 appointments?

6 A Uh-huh (affirmative).

7 Q What is the significance in terms of
8 the county delegation in terms of appointments?

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.

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.

20 Q Does a county delegation also
21 appoint certain people to positions?

22 A I don't know.

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

1 county for the delegation because there are
2 certain things that the county delegation has
3 authority to do?

4 A I think I followed your question.

5 Q I know. Sorry it's so complicated.

6 A Are you just asking if I understand
7 the county delegations are important?

8 Q Yeah. Well, let me ask you this
9 question. Do you have an understanding that
10 the partisan makeup of a county delegation is
11 important?

12 A Yes.

13 Q And why is it important?

14 A Well, sometimes they don't agree.
15 If all of the members of the delegation agree,
16 then they move forward with whatever it is that
17 they're wanting to do. If they don't agree,
18 then they do -- you know, sometimes it's a
19 party line vote. Sometimes it's not.

20 Sometimes it could be regional
21 within that county. It could be other issues
22 that they take opinions upon. But sometimes it
23 is a party line issue in the counties.

24 Q Has it been the case that if a
25 particular party's in control during a

1 redistricting cycle that a priority for them is
2 to maintain a majority in the county
3 delegations to the greatest extent possible?

4 A I don't know that it's a high
5 priority, and I would not venture to say that
6 it's a priority in every county. It's
7 something that some of the counties consider,
8 I'm sure, but I don't know that it's to the
9 extreme of the number one thing they're trying
10 to achieve.

11 Q Has Chairman Lewis ever expressed to
12 you the interest in, in any county maintaining
13 a majority of Republican members in the county
14 delegation?

15 A I'm not sure who you're asking me
16 about.

17 MR. WILL: Yeah, I'm not sure who
18 Chairman Lewis is either.

19 Q I'm getting, I'm getting my people
20 mixed up. Okay.

21 Has, has any legislator ever come to
22 you and said that they want to maintain a
23 majority of legislators in the county
24 delegation that is of the same party that they,
25 they are?

1 A I don't know that it's ever been
2 brought to me like that.

3 Q How has it been brought to you?

4 A It may come up in discussions of a
5 county, creating districts within a county, but
6 I don't recall ever having a member come to me
7 and say that, that that was the thing they
8 wanted to do.

9 Q But it's something that's come up
10 during the redistricting process that someone
11 has at least mentioned the partisan split in
12 terms of the county delegation?

13 A Yes.

14 Q Do you recall any particulars as to
15 who has mentioned that?

16 A I don't want to make a guess or just
17 try to, you know, throw things out, so I'm not
18 sure that I can name specific individuals that
19 that may have come up with.

20 (Whereupon a document was identified as
21 Defendant's Exhibit 8.)

22 Q Okay. All right. I want to move on
23 to the next exhibit. I'm going to mark it as
24 8. It's entitled, it's entitled Defendants'
25 Initial Disclosures. Ms. Wright, have you seen

1 this document before?

2 A No.

3 Q I'm going to ask you to go to the
4 third page under number five. It, it says,
5 "Provide the name of the people who are likely
6 to have discoverable information that are used
7 to support your claims or defenses," and here
8 we're talking about the Defendants in this
9 case. And then it refers to attachment A,
10 which is, if you to go page seven, you'll see
11 attachment A.

12 A Okay.

13 Q And then if you turn to page eight,
14 you'll see your name. Were you aware that the
15 State had identified you as a potential witness
16 in this case?

17 A In a document, no, but I would just
18 figure that.

19 Q Okay. All right. Now, if you, you
20 go several more pages on, it's -- you got to go
21 all the way to Exhibit 2.

22 A Okay.

23 Q Okay. And the first page after
24 Exhibit 2 is 2011-2012 Guidelines for the
25 Senate Reapportionment and Redistricting

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.

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

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 a appointment. They would sit down
25 and work with us. Sometimes it was a group of

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

1 folder, and there are in the House, is it 180
2 members? Did I get that number right?

3 A That's correct.

4 Q So if you had 180 individual
5 folders, let's say, how would you -- how is it
6 done that it would all come together? What was
7 the process of it coming together?

8 A Well, members would work on what
9 they wanted, whether it was an individual or a
10 group. As I said, it could be a whole area.
11 It could be a regional thing if it was a bunch
12 of members who worked together on it.

13 But they would ultimately take that
14 to the chairman, and the chairman would decide,
15 you know, if the members were in agreement this
16 is what they wanted to do, this is how they
17 wanted that area to look, then that would be
18 pieced together in a plan that was in his
19 folder.

20 Q Okay. So in terms of kind of where
21 the plan was going as a whole, you would have
22 looked in Chairman Lane's folder?

23 A Right.

24 Q You mentioned before meeting with
25 various delegations. I take it that that could

1 include a delegation from the House, a
2 delegation -- strike that.

3 Could you give me examples of
4 delegations? For example, did you ever meet
5 with the Black Caucus, or did anybody from your
6 office meet with the Black Caucus to your
7 awareness, to your knowledge?

8 A I don't recall actually meeting with
9 the Caucus in --

10 Q Okay.

11 A -- in a group form. Members of the
12 Black Caucus, yes, we did meet with, sometimes
13 singular, sometimes several of them.

14 Q And when you meet with people, do
15 you meet in a place, in a room, where you can
16 actually draw maps as you're talking to them?

17 A Yes.

18 Q Will you meet with county
19 delegations sometimes?

20 A You mean delegations of House
21 members or Senate members?

22 Q Yes.

23 A Yes.

24 Q So for example --

25 A If they come in together.

1 Q Yeah. And so are there times in
2 which the members of a delegation that are
3 House and Senate members from a particular
4 county, do they sometimes come in only with
5 people from the same party?

6 A Can you restate that?

7 Q Sure. In other words, are there
8 times in which, let's say, if you're meeting
9 with a delegation of Senators and House members
10 from Gwinnett County that you would -- there
11 would only be the Republican members that would
12 come in or only the Democratic members?

13 A I don't know that I recall meeting
14 with a delegation the size of the Gwinnett
15 County delegation as a whole, whether in part
16 or as a whole, and if they come in, it would
17 probably be a few members at a time. And I
18 can't say for certain whether they were always
19 of one party or if it was bipartisan.

20 MR. GREENBAUM: Okay.

21 MR. STRICKLAND: Is this a good time
22 for a break?

23 MR. GREENBAUM: Yeah, let's take a
24 break.

25 MR. STRICKLAND: All right.

1 THE VIDEOGRAPHER: Going off video
2 record at 10:51 a.m.

3 (Proceedings in recess, 10:51 a.m. to
4 11:01 a.m.)

5 THE VIDEOGRAPHER: We are back on
6 video record at 11:01 a.m.

7 Q So, Ms. Wright, before the break, we
8 were talking about the redistricting guidelines
9 that the Senate and the House used in the 2011
10 redistricting cycle. To what extent did you
11 pay attention to these what they call general
12 principles for drafting plans when you were
13 working on the 2011 House plan?

14 A These are basically common
15 principles of redistricting, so this is pretty
16 much what I would have done.

17 Q Okay. So you didn't -- you weren't
18 referring to the particular document, but you
19 were, because of your knowledge of
20 redistricting, relying on similar principles;
21 is that correct?

22 A Yes.

23 Q All right. So let's -- I'm going to
24 ask you about several of the principles.

25 Principle number two says, "Each

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

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

1 still acknowledging the fact that there were,
2 you know, districts here that may have been
3 before, may not been 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

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

1 specifically working with any outside
2 attorneys, no.

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?

8 A Which, at which time?

9 Q Let's start with '11.

10 A I don't recall working with anyone
11 from the Attorney General's Office then.

12 Q Okay. How about '12?

13 A Until it came time to do the
14 preclearance submission, we usually weren't
15 working closely with the AG's office.

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?

22 A Can you say that one more time?

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

1 your office was trying to accomplish or what
2 you felt like you needed to do or what the --
3 to comply.

4 A In relation to the Voting Rights
5 Act?

6 Q Yes.

7 A That was, that was, yes, probably
8 the most important objective, yes, was to not
9 retrogress.

10 Q That the key objective was to at
11 least maintain the same number of
12 majority-minority districts?

13 A Right, related to the Voting Rights
14 Act.

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?

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

1 tried to focus on that.

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.

8 Q With respect to you mentioned
9 contiguity a second ago. What is your
10 understanding of what contiguity is?

11 A Contiguity being all parts of the
12 district touch each other and at more than a
13 single point.

14 Q How do you, when you're drawing a
15 map, determine whether there's contiguity?

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.

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

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.

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?

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.

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

1 know that that's beneficial to all the local
2 governments.

3 Q Under what circumstances will you
4 split counties?

5 A Normally, counties are split because
6 of population. If they are larger than
7 whatever the district size is that we're
8 drawing, then, obviously, you have to have more
9 than one district that makes up that county.

10 Sometimes it goes into the history
11 of a county. Maybe it's always had two members
12 that have represented it or more. There's a
13 lot of reasons that can go into play, but I
14 would say population is the number one.

15 Q So population, history of the
16 county. Can you think of any others?

17 A Of why we would split a county?

18 Q Yes.

19 A Off the top of my head, I don't
20 know.

21 Q Okay. And when you're using
22 Maptitude, will it let you know as you're
23 working on a plan how many counties are being
24 split by that plan?

25 A You can run certain reports that

1 would tell you that.

2 Q And how about splitting precincts?
3 Under what circumstances -- you mentioned
4 before that you try to the extent possible to
5 keep precincts intact. Under what
6 circumstances would you split precincts?

7 A Again, if you're trying to balance
8 population and you can't do it within the
9 realms of keeping precincts whole, which is
10 always what I try to do first, sometimes it
11 happens that you have to divide a precinct.

12 Sometimes the precinct may be
13 divided because an incumbent lived in a
14 precinct and had a reason for wanting it split.
15 That could happen. Normally, they want their
16 whole precinct though, so if we can do that, we
17 do.

18 Sometimes it may be geographical.
19 If there's a good reason there to divide that
20 precinct to make it more -- to make more sense
21 for the balance of the district, maybe it's a
22 major interstate that divides it, maybe the
23 precinct -- in some cases the precincts have
24 noncontiguous geography, and they follow city
25 limit lines or they have islands and pieces

1 that make up that precinct, and because we
2 can't have noncontiguous districts, we split
3 the precinct then to account for the way that
4 the precinct is drawn.

5 I'm sure there may be more.

6 Q Well, I'd like -- so the three that
7 you mentioned so far, let me make sure I have
8 this correct first, is you'd split to balance
9 population? You'd split having to do with the
10 residence of an incumbent?

11 A Could happen.

12 Q And the third that you mentioned was
13 geographical. And examples you gave was
14 division by an interstate or where, where there
15 are noncontiguous boundaries. Can you think of
16 any other instances in which you'd split a
17 precinct?

18 A I mean, I suppose, if you were
19 trying to keep a particular city or community
20 together, you might would do that then. If
21 that precinct was sufficiently large and had
22 different regions or sections in it that were
23 different communities, you might do that for
24 that.

25 Q Any others?

1 A I don't know. I'm sure there may be
2 others, but that's what's coming to me right
3 now.

4 Q Okay. And when you're in Maptitude,
5 will it let you know when precincts are being
6 split?

7 A Maptitude as it is will run a report
8 based on the VTDs, so that report would be
9 accurate with the VTD layer. However, if there
10 have been changes to precinct boundaries in a
11 county -- which we do have changes that went
12 in.

13 In 2010, prior to the redistricting
14 cycle, we had a new precinct layer already. So
15 you kind of have to keep that in mind as well
16 that those won't show up in the report
17 necessarily, but you can kind of get a ballpark
18 idea from using that.

19 The further you get away from the
20 VTD layer and the census data, you know, from
21 2010, the more counties have made precinct
22 changes and the more that report becomes a
23 little bit less useful.

24 Q And then 7b references compactness.
25 What is your understanding of compactness?

1 A Compactness being how closely
2 related to a center point or the size of the
3 district, the shape of the district.

4 Q How do you go about, when you're
5 working on a plan, ensuring compactness?

6 A There -- I know that there are
7 things, tests that you can run, for
8 compactness. I have not used those
9 traditionally. Compactness, I guess, in my
10 opinion can sometimes be in the eye of the
11 beholder. So if I'm the beholder, I look at
12 it.

13 Q Is compactness something that you
14 prioritize when you're drawing plans?

15 A It depends on what the other
16 criteria are for a particular area or district.
17 Yes, I mean, it's important, but I think there
18 are other factors that would probably take a
19 higher precedence if I was ranking them.

20 Q Okay. Well, along those lines,
21 could you tell me what your ranking is of
22 factors?

23 A I don't really have one, but I know
24 complying with the law is obviously at the top
25 of that list, so you would want to make sure

1 you're complying with the law. That's the
2 number one thing.

3 And then outside of that, it's not
4 really that there's a hierarchy or anything. I
5 work with all of the principles together. In
6 any given case, one may be more, more easily
7 done than another.

8 Q So you mentioned before that you
9 don't use quantitative measures of compactness;
10 correct?

11 A That's correct.

12 Q Do you know if Maptitude has certain
13 measures of compactness within the program?

14 A I believe it does.

15 Q Do you know what any of them are
16 called?

17 A Yes, maybe.

18 Q Okay. Have you heard of Reock
19 before?

20 A Yes.

21 Q And is that something that Maptitude
22 uses?

23 A I believe so.

24 Q Okay.

25 A I think there is -- think there's a

1 list in there that you can pull down a menu to
2 use them, but I don't use that.

3 Q And do you have an opinion on using
4 any of these measures one way or the other?

5 A No. I don't use them.

6 Q Are you in a position to evaluate
7 whether any of those measures are legitimate or
8 illegitimate?

9 A I don't use them, so I'm not in that
10 position.

11 Q And then moving on to number nine --
12 I mean, I'm sorry, 7c, communities of interest,
13 are communities of interest something that you
14 consider when you're drawing a plan?

15 A Communities of interest is a hard
16 principle to define. Our state's really large,
17 obviously. I don't know every community of
18 interest across the state and where they are
19 and how they would define themselves.

20 As a community of interest can be
21 people who shop at a certain area or people who
22 attend a certain church or people who travel
23 certain areas. That's very difficult. There's
24 not a cut and dry way to define it.

25 So those types of measures would be

1 something that is a little bit more from the
2 members and from the local delegations and from
3 the local people that they can define that and
4 say to us, this area is, you know, they all
5 have kids at this school or they, whatever, you
6 know. They know that area, that feature, more
7 than we would.

8 So if it's brought to our attention
9 for a reason from an individual member or from
10 someone from the community that is involved in
11 doing the work on this, then, yes, we would
12 look at that.

13 Q But it's not something that you go
14 out and try to determine yourself? You sort of
15 rely on, to the extent that a member or
16 somebody else identifies something as a
17 community of interest --

18 A Right.

19 Q -- that you'll use that?

20 A Right, if possible.

21 Q And in Maptitude, is there any way
22 to measure communities of interest?

23 A Not that I'm aware of.

24 Q Now, we were talking a little
25 earlier about demographic change in Gwinnett

1 County; correct?

2 A Yes.

3 Q And you mentioned the difference
4 between the 2000 and the 2000 [sic] census
5 data in Gwinnett County with respect to
6 demographics; correct?

7 A 2000/2010, yes.

8 Q And is it fair to say that, first
9 of all, that total population in Gwinnett
10 County grew tremendously between 2000 and
11 2010?

12 A Yes, it grew a lot.

13 Q Do you use American FactFinder by
14 the way in terms of looking at census data?

15 A Do I, or have I?

16 Q Have you?

17 A I have.

18 Q Did you with respect to
19 redistrictings for any of the state
20 legislative plans?

21 A Not that I recall.

22 Q Okay. But in any event, you knew
23 that, because of the growth of population in
24 Gwinnett County, it would likely have more
25 districts in the 2011 plan than it had

1 previously?

2 A Yes.

3 Q Okay. Would it also be the case
4 that the, that the growth in population in
5 Gwinnett County was driven by the growth of
6 minority population --

7 A Do you --

8 Q -- between 2000 and 2010?

9 A I don't know the specific amounts of
10 growth and what categories they fell in. I
11 know they had a lot of growth, but I don't know
12 the details.

13 MR. WILL: 10 and 11?

14 THE WITNESS: 2010 --

15 MR. WILL: No, exhibit numbers. 10
16 and 11?

17 THE WITNESS: 9 and 10.

18 (Whereupon documents were identified
19 as Plaintiff's Exhibit 9 and Plaintiff's
20 Exhibit 10.)

21 Q All right. I'm marking as Exhibit 9
22 the Census 2000 Summary File 1 profile of
23 Gwinnett County and Exhibit 10 is the 2010
24 census profile of Gwinnett County.

25 Ms. Wright, are you -- not talking

1 about these documents in particular, but have
2 you seen similar printouts from the census in
3 terms of laying out population information for
4 counties under the census data?

5 A I've looked at it online before.

6 Q Okay. I want to call your attention
7 to the second page of this document.

8 Well, let's start with the overall
9 population. So you see that in 2000 the
10 population is 588,488; correct?

11 A Correct.

12 Q And in 2010 the population jumps up
13 to 805,321; correct?

14 A Correct.

15 Q And what I want to do is compare the
16 white non-Hispanic numbers, so in 2000, if you
17 go to the second page and under Hispanic or
18 Latino and race, it breaks it up between --
19 there's a portion that talks about the Hispanic
20 population, and then it says non-Hispanic or
21 Latino population.

22 A Uh-huh (affirmative).

23 Q And then under that, it has the
24 white non-Hispanic and Latino population, and
25 you see that that number is 394,164?

1 A Yes.

2 Q Okay. And then if you look at 2010
3 and you go to the third page toward the bottom,
4 it has Hispanic or Latino and race, and there's
5 a whole section on non-Hispanic or Latino, and
6 the white population you see is 354,316;
7 correct?

8 A Yes.

9 Q And so the county population
10 increased by over 200,000 people between 2000
11 and 2010; correct?

12 A Yes.

13 Q And the white non-Hispanic
14 population decreased from roughly 394,000 to
15 354,000; correct?

16 A Yes.

17 Q And so the growth in population in
18 Gwinnett County between 2000 and 2010 was
19 driven by the Latino population, by the -- by
20 the nonwhite population; correct?

21 A According to what you're showing
22 here, that looks to be very much of an impact.
23 It made a very big impact, yes.

24 Q Now, were you aware of that at all
25 when you were working on the House plans in

1 2011?

2 A Yes. We knew there was a growth in
3 Hispanic population. We drew a majority
4 Hispanic district in the house.

5 Q Did you also know that there was a
6 large growth in the black population?

7 A I don't know that I knew the numbers
8 of it, but as we mentioned before, yes, we knew
9 there was changing demographics and growth in
10 different areas, so.

11 Q So, I mean, we'll just look at this
12 really briefly. If you go to 2000 at the top
13 of the second page -- actually, it's at the
14 bottom of the first page, it has race, and it
15 has black or African-American, and it's 78,224
16 for -- bottom of the first page for 2000.

17 A Okay. I see that.

18 Q And if you go to -- and for 2000,
19 they didn't have black non-Hispanic, so that
20 would include people who black and Hispanic and
21 black and non-Hispanic.

22 For 2010, they did, they did break
23 that down, and you see that at the bottom of
24 the third page next to the white population
25 that the black or African-American non-Hispanic

1 population is 184,122?

2 A Yes, I see that.

3 Q So fair to say that the black
4 population went from 78,000 to 184,000?

5 A Yes.

6 Q And on a percentage basis, the black
7 population went from 13 percent to 22.9
8 percent; correct?

9 A Looks to be correct.

10 Q Now, you mentioned before the
11 increase in the Hispanic population in Gwinnett
12 County between 2000 and 2010; correct?

13 A Actually, you did, but yes.

14 Q But you, acknowledged that --

15 A Yes.

16 Q -- correct?

17 A Uh-oh. Something just came
18 unplugged, I think. Maybe not.

19 MR. WILL: You're good.

20 A We're good. Okay. Sorry.

21 Q And in drawing the districts in
22 2011, did your office take into account that
23 increase in Hispanic population in Gwinnett?

24 A As much as we were aware of what is
25 shown with the data, yes, Hispanic data that we

1 have always used for analysis has always been
2 that the Hispanic is an ethnicity, so it can be
3 used in combination, you know, with other
4 races.

5 So keeping that in mind when we were
6 looking at it, we have not in the past dug down
7 to the level of the non-Hispanic this, that,
8 and the other and all these categories. It's
9 not been something that we ever -- we never
10 used the data that way.

11 Q Now, in Georgia, people who are --
12 when people fill out their registration forms,
13 it asks them to list a race or ethnicity or
14 indicate a race or ethnicity; correct?

15 A When they register to vote, you
16 mean?

17 Q Yes.

18 A I believe it's a combined question.
19 It's one or the other. It's altogether. It's
20 what is your race/ethnicity, and there are
21 options.

22 Q And Hispanic is treated as a
23 different option than anything else, correct, a
24 separate and distinct option?

25 A No, not that I -- to my knowledge,

1 Hispanic is included in that one question, so
2 they either pick those -- one of those options.

3 Q Right. And Hispanic would be a
4 different option than, let's say, white or
5 black --

6 A Right.

7 Q -- correct?

8 A Right.

9 Q Sorry if I didn't make that clear
10 enough the first time.

11 Now, with respect to the 2011 plan,
12 did you work on the districts in Gwinnett or
13 Henry County at all to your recollection?

14 A I did work on Henry County. I'm not
15 real clear about how much work I did on
16 Gwinnett in the 2011 cycle.

17 Q Okay.

18 A Don't remember.

19 Q All right. So let's, let's, let's
20 move on to Henry County. And by the way, in
21 Gwinnett and Henry County for the State House
22 districts, there was no difference between the
23 2011 House plan and the 2012 House plan;
24 correct?

25 A No, that's not correct.

1 Q Oh, there was.

2 A In Gwinnett, the northern part of
3 Gwinnett was changed some in the '12 plan.

4 Q Okay.

5 A As a result of the changes that were
6 made in the Gainesville area, they trickled
7 down into the northern part of Gwinnett.

8 Q All right. But it didn't affect 104
9 or 105?

10 A It did affect 104.

11 Q Okay. It didn't affect 105;
12 correct?

13 A It did not affect 105.

14 Q All right. And with respect to
15 Henry County, were those districts the same in
16 2011 and 2012?

17 A Yes, they were.

18 Q Okay. So let's talk about Henry
19 County, which you said you worked on with
20 respect to the 2011 redistricting.

21 A Yes.

22 Q Were you aware that the overall
23 population in Henry County increased
24 dramatically between 2000 and 2010?

25 A Yes.

1 (Whereupon documents were identified as
2 Plaintiff's Exhibit 11 and Plaintiff's
3 Exhibit 12.)

4 Q Okay. We'll look at, we'll look at
5 some of the numbers.

6 Oh, I'm sorry.

7 All right. I'm going to mark as
8 Exhibit 11 the 2000 census profile in Henry
9 County and as 12 the 2010 census profile for
10 Henry County.

11 A This is 2000. There's several --
12 there's more of these here.

13 MR. WILL: 2000 is 11, and 2010 is
14 12?

15 MR. GREENBAUM: Correct.

16 Q Ms. Wright, you see that the
17 population in Henry County increased
18 dramatically between 2000 and 2010; correct?

19 A Yes.

20 Q And it went from 119,341 in 2000 to
21 203,922 in 2010; correct?

22 A That's what this shows, yes.

23 Q What was, in terms of total
24 population for the, for the, for the 2000
25 census plans, what was the approximate amount

1 of the number of people in the district?

2 A For the average district size?

3 Q Yes.

4 A It was about 50, 50-something
5 thousand. 54,000 maybe rounded.

6 Q For 2000 or 2010?

7 A '10.

8 Q Okay. 2010. And do you recall what
9 it was for 2000?

10 A 40-something thousand, I think. I'd
11 have to go back and look.

12 Q So let's say it's 40-something
13 thousand. So in Henry County, if you kept --
14 let's say, you try to keep county boundaries
15 intact as much as possible. In 2000, it would
16 have a little bit less than three districts'
17 worth of population?

18 A Say that again.

19 Q Sure. Let's say that, let's say
20 that your overriding goal was to keep
21 counties -- to keep districts contained within
22 one county when you were redistricting. Would
23 it be fair to say that for 2000 Henry County
24 had a little bit less than three full districts
25 of population? Because if each district had

1 40,000 people, the county as a whole has
2 119,000.

3 A I think it was closer to 45 to
4 50,000.

5 Q Okay.

6 A It wasn't -- it was on the middle to
7 the upper end, but if you could just strap it
8 within the county and limit it to the
9 boundaries, then it would divide to about
10 three, but that's not ever really possible.

11 Q A little bit, a little bit less than
12 three; right?

13 A Right.

14 Q And then for 2010, if the average
15 district is about 54,000 and the total
16 population is 203,000, it's somewhere
17 between -- it's close to four full districts'
18 worth of population; correct?

19 A If you, if you're dividing it by
20 that, yes.

21 Q Okay. In Henry County, how many
22 full districts or portions of districts are in
23 the county?

24 A On the House map?

25 Q On the House map.

1 A In the 2011/2012 version?

2 Q Let's take them both. For 2012, how
3 many are there?

4 A I believe there's eight.

5 Q And three of those eight are
6 majority-minority districts; is that correct?

7 A Yes, I think so.

8 Q And do you know the race of the
9 people that represent those districts?

10 A Of the three districts?

11 Q Uh-huh (affirmative.)

12 A I think all three are
13 African-American.

14 Q And do you know what party those
15 three representatives are from?

16 A They are from the Democratic party.

17 Q Okay. And then the other five
18 districts, what are the race of the people who
19 represent those districts?

20 A They are white.

21 Q Okay. And then what party are they
22 from?

23 A Republican.

24 Q I want to -- it will help me, it may
25 not help you, but I'd like to take a look at

1 the Henry County maps while we're talking
2 about -- keep these documents out.

3 A You want the most recent?

4 Q Let's start with '12, and then we'll
5 go to '15. So in '12, what are the three
6 districts that are majority-minority?

7 A It would be 76, 78, and 90.

8 Q And 76, what other county is 76 in?

9 A Clayton.

10 Q And is Clayton majority black
11 county?

12 A Yes.

13 Q And how about 78?

14 A What county --

15 Q What county in addition to Henry
16 County?

17 A Oh, it's also in Clayton.

18 Q And then District 90, is that --
19 what, what other county is District 90 in, if
20 any?

21 A It has part of Rockdale and part of
22 DeKalb.

23 Q And then of the, of the eight
24 districts that are in Henry County in 2012, how
25 many of them were only in Henry County?

1 A One.

2 Q And that's 111?

3 A Yes.

4 Q And then today is that also the
5 case?

6 A Yes.

7 THE VIDEOGRAPHER: Excuse me,
8 Mr. Greenbaum. Could you please flip your
9 microphone over? It's upside down.

10 MR. GREENBAUM: Sorry about that.

11 THE VIDEOGRAPHER: It's okay. Thank
12 you.

13 Q All right. So going, going back to
14 Henry County, I want to take a look at -- we
15 talked before -- or maybe we didn't talk
16 before. Henry County, the overall population
17 increased by about 84,000 people between 2000
18 and 2010; correct?

19 A Yes.

20 Q Okay. And I wanted to look at the
21 non-Hispanic white population. If you go to
22 the second page of 2000, you'll see under
23 Hispanic and Latino and race, you'll see that
24 the white non-Hispanic population was 95,550;
25 is that correct?

1 A Yes.

2 Q Okay. And then for 2010, you see
3 that the white population is 107,000; correct?

4 A Yes.

5 Q And that -- so there's a slight
6 increase, but as a percentage, the white
7 non-Hispanic population goes from 80.1 percent
8 to 36 -- sorry. You see that between 2000 and
9 2010 the white non-Hispanic population goes
10 from 80.1 percent to 52.5 percent; correct?

11 A I see that, yes.

12 Q And so Henry County goes from being
13 roughly four-fifths white to being roughly half
14 white; correct?

15 A Yes.

16 Q And that correspondingly for the
17 black population, you have to go back to the
18 first page for 2000 under race, and you see
19 that the black population in 2000 was at
20 17,000; is that correct?

21 A Yes.

22 Q And that in 2010 the black
23 non-Hispanic population is at 74,000; is that
24 correct?

25 A Yes.

1 Q And so it more than quadrupled
2 during those ten years?

3 A Yes.

4 Q And that the percentage went from
5 14.7 percent to 36.3 percent; is that correct.

6 A Yes.

7 Q Okay. And so there's a lot more
8 black population in Henry County in 2010 than
9 2000. Do you know essentially where all these
10 people came from?

11 A They didn't tell me.

12 Q Okay. Do you know why the black
13 population increased by that, by that amount?

14 A They moved into the county.

15 Q Do you know if -- have you studied
16 the demographic trends to see whether people
17 are moving from places like Clayton County and
18 other adjoining counties into Henry County?

19 A I have not studied that, no.

20 Q Okay. Did you, did you pay
21 attention when you were working on Henry County
22 in 2011 as to where the concentrations of black
23 population are in the county?

24 A I would, I would say that I knew
25 more or less where they were, yes.

1 Q Okay. And what was your
2 understanding of where the, where the black
3 population was predominantly concentrated?

4 A There are some heavier areas that
5 are concentrated in the northern parts of the
6 county and then along that side of the county
7 that borders Clayton County.

8 Q Okay. So the closer people were to
9 the northern part of the county to Clayton
10 County, those were the areas that had the
11 larger black populations; correct?

12 A I would -- yes. And I would say
13 they also have had larger growth in general, of
14 all kinds of growth.

15 Q Okay. And when you were -- so you
16 had, you had the VTDs and the precincts in 2010
17 when you were working on the portion of the
18 county in Henry County, a portion of the plan
19 that was in Henry County; correct?

20 A Yes.

21 Q What, what legislators did you work
22 with respect, with respect to Henry County for
23 the 2011 plan?

24 A In the House, is that what you're
25 asking?

1 Q Yes.

2 A I recall meeting with Steve Davis.
3 I believe I met with Andy Welch. At some
4 point, everyone on the delegation met with me,
5 which would include representatives from those
6 districts from Clayton County and also from the
7 90th. I met with all of them at some point,
8 but some of those members are not the same
9 members that we have now.

10 Q Did you, did you have an
11 understanding at the time as to -- when you
12 drew the plan in 2011 in Henry County, did you
13 have, in addition to census data, voter
14 registration data that you looked at?

15 A I don't recall looking at voter
16 registration data. We probably had it in our
17 file, but I don't remember looking at it.

18 Q You mentioned before that -- strike
19 that.

20 So with respect to Maptitude, do you
21 have in Maptitude the ability, when you're
22 drawing around in a plan, the ability to look
23 at what the racial data is?

24 A In what capacity?

25 Q Let's, let's say you're -- let's say

1 you're working on a plan in Henry County and
2 you're drawing out districts, and I suspect
3 that each of the districts as you're drawing it
4 will have certain metrics that will go with
5 that district. It will have total population,
6 for example; right?

7 A Uh-huh (affirmative).

8 Q You have to -- you have to --

9 A Right.

10 Q Will it also have racial data with
11 respect to that district?

12 A When I work on a plan, I use the
13 pending changes box, which is a feature in
14 Maptitude that shows you how your numbers
15 change as you select what geography you're
16 selecting.

17 Q Okay.

18 A And you can set and move which
19 fields you want to have in that change box as
20 you go. So for me I usually keep a
21 combination. I like to have the political data
22 there as well as other data, racial data,
23 population data, all of those other things.

24 Q Now, the political -- so, so the,
25 the race data you will have at the block level;

1 correct?

2 A Yes.

3 Q In terms of the political data, what
4 will be the level of geography that you'll have
5 that at?

6 A I have it at the block level also.
7 It's an estimate. When we bring in our file
8 from the Secretary of State's office, it is
9 completely accurate to the precinct, but when
10 we allo -- we allocate that data from them to
11 the block level, it estimates that figure to
12 the blocks based on the percentage and
13 proportions of the population.

14 So it would take the voter
15 registration numbers and allocate that to
16 correspond to however many -- if you have, for
17 example, if you have a block where, or several
18 blocks, in a precinct where you have a lot of
19 population right here in these blocks and then
20 nobody, you have zeros out here, it's going to
21 obviously allocate that proportion there of the
22 voter data, not here because nobody lives here.
23 So it spreads it out through the blocks.

24 Q And when you're talking about
25 political data, what political data do you

1 have? What political data do you get?

2 A I think we kind of hit on it
3 earlier, but it's the -- we have the
4 registration numbers from those fields, and
5 then we have contested races, statewide
6 contested races, that we pull in from that
7 cycle before.

8 So when we drew in '11, that would
9 have had the 2010 precinct layer that we build
10 with the precinct changes in that as well as
11 that data from the 2010 election cycle.

12 Q So, so you'll have things like
13 statewide races in there that are contested?

14 A Yes.

15 Q And then will you also have local
16 races in there --

17 A No.

18 Q -- that are contested? So it's
19 only, it's only the statewide races that you'll
20 have?

21 A It's a statewide layer that's built.
22 We build it for the, the entire state, all the
23 precincts in the state. So, yes, we have to
24 have something that is universal that we can
25 apply across the entire plan.

1 So, right, it's the only statewide
2 races, so if it was a governor's race or a US
3 Senate race or whatever, those are the kinds of
4 things that will be on there.

5 Q Will you also have the voter
6 registration data on that level in terms of --
7 will you have the voter registration data?

8 A Yes.

9 Q Will you have the voter registration
10 data broken out by race?

11 A I don't know that it breaks down all
12 of the race categories. I don't, I don't think
13 that it does, not to the extent of what these
14 categories are. It may break down -- I don't
15 remember if it breaks down all of the ones that
16 are in the selection field.

17 Q How about black?

18 A Yes.

19 Q Now, I want to ask you a little bit
20 more about the estimation component, so let's
21 say that you have a precinct that has a
22 thousand voters in the precinct, and let's say
23 that the Democratic candidate receives 50
24 percent of the vote in the precinct and the
25 Republican candidate receives 50 percent of the

1 vote in the precinct, and you're splitting the
2 precinct between two different districts.

3 Will it assume that every block is a
4 50-50 vote, or how will it count for the fact
5 that it's unlikely that you're going to have
6 that sort of split in a particular county?

7 A It is my understanding, and I'm not
8 the person who handles doing this aspect of
9 creating the layer, but it is my understanding
10 that there is -- the formulas that are built
11 within to the way that it allocates that data
12 that it's going to use the voter registration
13 number in conjunction with the VAP numbers.

14 So if you have a portion of the
15 block that has a higher percentage of -- say,
16 that particular 50-50 block, say, there's a
17 portion there -- or it's not a block. It's a
18 precinct, I guess.

19 There's a block that has, you know,
20 completely white VAP. Well, it's not going to
21 allocate black registered voter numbers to a
22 block that's got no black people in it, if that
23 makes sense.

24 Q Yeah.

25 A So there's some way in the

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.

7 Q So in terms of the, in terms of the
8 political -- I'm interested in terms of the
9 political calculation.

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?

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.

24 Q So every, so every precinct that's
25 within again -- or strike that.

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?

8 A I would assume so.

9 Q You don't know?

10 A I don't know for certain.

11 Q Okay.

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.

15 Q Who --

16 A So I don't know.

17 Q Who would be the person in your
18 office that would know the answer to that?

19 A That would Rob Strangia.

20 Q Okay.

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

1 completely connected to what those precinct
2 boundaries were and how they voted for the
3 previous election cycle.

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?

10 A Say that one more time?

11 Q Yeah. It's just, it's just back
12 to --

13 A I'm starting to feel like this.
14 Yeah.

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 --

18 A Okay.

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.

23 A Correct.

24 Q But it's being assumed for the
25 purposes of doing the political calculation

1 that it's breaking down 50-50.

2 A In an unusual case such as that,
3 yes, I would think it would calculate it that
4 way.

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.

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.)

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.

24 All right. I'm going to mark as
25 Exhibit 13 a document where the first page is a

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?

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

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.

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

1 to do that work, so I think that's what that is
2 in conjunction with.

3 Q Okay. Okay. All right. And then I
4 want to go to, to the staff page, if you go a
5 couple, a couple more. And then there's a -- I
6 think the only new name on here is Kade
7 Cullefer?

8 A Uh-huh, yes.

9 Q Kade is a man or a woman?

10 A A man.

11 Q A man. So Mr. Cullefer, what was he
12 doing as a redistricting specialist that was
13 different than what you were doing at the time?

14 A In 2011 through that cycle, I was
15 primarily working on the statewide maps. Most
16 of the other staff members who worked on
17 redistricting were involved in local
18 redistricting or a combination thereof, local
19 as well as some of the legislative work.

20 Q So in terms of the people that were,
21 were working on the plans themselves within the
22 office, and I'm talking about the state plans,
23 was Mr. McDonald working on them?

24 A How do you define working?

25 Q Well, what did Mr. McDonald do in

1 relationship to the State House map plan?

2 A I really don't know.

3 Q Okay. So I take it from your answer
4 he didn't -- he did not have much involvement,
5 to your knowledge?

6 A I don't -- in terms of the technical
7 end of it, that would be correct.

8 Q What end of it would -- did he have
9 more of a role?

10 A Um -- I know I'm not supposed to say
11 um.

12 He did a lot of talking. I mean, he
13 conversed with a lot of people. He was doing
14 more of the discussion end of it, I think,
15 meeting with people and having conversations
16 and those sorts of things.

17 Q Was he taking information from those
18 conversations back to you and the other people
19 that were actually working on the plan?

20 A Yes.

21 Q All right. And it says that with
22 respect to Ms. El that she was focusing on
23 local redistricting. Did she have any
24 involvement in the State House plan
25 development?

1 A No.

2 Q And I think we mentioned that
3 Ms. Cooper and Mr. Strangia, they weren't
4 really -- they aren't really plan drawers in
5 terms of what they do?

6 A That's correct.

7 Q So the primary plan drawers within
8 the office with respect to the statewide plan
9 were you and Mr. Cullefer; is that correct?

10 A That is correct. This list was
11 prior to Mr. Knight being hired. That would
12 have been still in 2011, but it was -- and it
13 was still before we were deep, you know, into
14 the process. So he, he worked a lot on local,
15 but he also assisted some with some of the
16 House work.

17 Q So you -- but you and Mr. Cullefer
18 would have done more on the House plan than
19 Mr. Knight?

20 A As I said before, I think the House
21 plan was a group effort. Mr. Knight worked on
22 it some. Mr. O'Connor was not yet, I guess,
23 established and back into our office at that
24 point, and he worked on that some as well.

25 Q Where was Mr. O'Connor working at

1 the time?

2 A He was an employee of the General
3 Assembly. He was with -- he was the committee,
4 what, analyst or redistricting committee
5 analyst or research person. I don't know what
6 the title of that is, but.

7 Q Okay. And was he primarily working
8 for one party or the other? You know like, for
9 example, in Congress, staffers are usually,
10 even if they don't have an official title,
11 they're usually working for a particular member
12 or a particular party.

13 A That's not the case with the Georgia
14 General Assembly, no. He worked for everybody.

15 Q Okay. I want to go to the page that
16 is the next page of -- it's an email dated
17 February 21st, 2011.

18 A 23rd?

19 Q February 23rd, 2011.

20 A Okay. I thought you said 21st.

21 Q My mistake.

22 Is it the case that one of the
23 things your office was asking for was the, the
24 residence address of each member?

25 A Yes.

1 Q And why is that?

2 A So we know where they live. Because
3 if incumbency is an issue that they want to
4 address, then we have to know where the
5 incumbents' addresses are in order so we don't
6 pair incumbents together and whatnot.

7 Q And then if you look a couple pages
8 on, there's an email on June 20th to, it looks
9 like, from Mr. McDonald to all of the, all of
10 the members. Was it the way that it worked
11 that members, if they wanted to talk to the
12 staff about the redistricting plan, that they
13 needed to make an appointment through
14 Ms. Cooper?

15 A I believe that was the case, yes.

16 Q The email, there's a person that
17 cc'd whose name is Spiro Amburn.

18 A Spiro.

19 Q Spiro Amburn.

20 A Uh-huh (affirmative).

21 Q My mistake. And Mr. Amburn, what
22 was his role at the time?

23 A He is the chief of staff to the
24 speaker of the house.

25 Q He was and is?

1 A He is, yes.

2 Q Do you recall whether he was in
3 2011?

4 A I believe he was, yes.

5 Q Okay. And then the last page has a
6 redistricting timeline on it. Have you seen
7 that timeline before?

8 A I probably have. I don't recall it.

9 Q Was this basic schedule sort of
10 consistent with the timeline you were working
11 on?

12 A Seems to be accurate.

13 (Whereupon a document was identified as
14 Plaintiff's Exhibit 14.)

15 Q Okay. Thank you. All right. Now I
16 want to move on to the redistricting
17 submission.

18 All right. I'm going to mark as
19 Exhibit 14 a document entitled Submission Under
20 Section 5 of the Voting Rights Act - Request
21 For Expedited Review.

22 Ms. Wright, did your office play a
23 role in the Section 5 submission to the
24 Department of Justice in October 2011?

25 A How would you define "play a role"?

1 Q Do you provide -- did you write any
2 of it? Did you provide information for it?
3 That's what I mean.

4 A I did not write any of it. We did
5 provide maps, reports, and whatnot.

6 Q Did you review it before it went in?

7 A No.

8 Q And we're going to be, we're going
9 to be going through some of the exhibits. Have
10 you seen this submission prior to today?

11 A I don't recall.

12 Q Okay.

13 MR. WILL: Just as a matter of
14 edification for the lawyer who's not a member
15 of the parties, what -- how does this relate to
16 the claims in the suit, and how does it relate
17 to what she was designated to testify to as a
18 30(b)(6) witness?

19 MR. GREENBAUM: It relates in that a
20 lot of the data that the office relies upon I
21 think is data that -- as I talked about in
22 terms of the exhibits, I'm not going to ask so
23 much about the content of the data in the
24 submission, but the content and what the
25 office -- some of the exhibits and what the

1 office relies --

2 MR. WILL: I'm trying to give you
3 every benefit of the doubt, but --

4 MR. GREENBAUM: I understand.

5 MR. WILL: -- also when you have
6 30(b)(6) witnesses, you like them to be
7 generally prepared to respond to what they're
8 asked to respond to, and I'm not sure that 2011
9 fell within those categories.

10 MR. GREENBAUM: Sure. You know --

11 MR. WILL: So I don't want to -- I
12 don't want to say -- have a witness saying I
13 don't know, I don't know, I haven't seen them,
14 not familiar with it because we weren't asked
15 to prepare for that, so.

16 MR. GREENBAUM: Fair enough.

17 MR. WILL: Okay?

18 MR. GREENBAUM: You know, part of my
19 intent too was to avoid having the witness come
20 back in her own capacity and get it all done at
21 once.

22 MR. WILL: I think we've all in
23 agreement on that.

24 MR. GREENBAUM: Great.

25 MR. WILL: Thank you, Mr. Greenbaum.

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

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

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.

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.

1 All right. Number 20.

2 (Whereupon a document was identified as
3 Plaintiff's Exhibit 15.)

4 Q Okay. All right. Ms. Wright, I'm
5 marking as Exhibit 20 a document that in the
6 upper right-hand corner --

7 A It says 15.

8 THE COURT REPORTER: Exhibit 15.

9 Q That's right. I have a different
10 numbering system here. Exhibit 15 is a
11 document that's numbered 1392 in the upper
12 right-hand corner. It says
13 Exhibit A - Benchmark House Plan. Do you
14 recognize this document, Ms. Wright?

15 A Yes.

16 Q What is the document?

17 A This is a standard stat sheet that
18 we produce in our office. This would be the
19 Benchmark House Plan, which would have been the
20 House districts as they were in 2010 with the
21 new census data applied to those district
22 boundaries.

23 Q Okay. I'm going to ask you about
24 some of the -- and this is -- is this a kind of
25 standard report that your office creates with a

1 new redistricting plan?

2 A Yes. This is the standard stat
3 sheet we create for most all of our
4 redistricting plans.

5 Q And is this something that you do
6 through Maptitude or you do it through another
7 means?

8 A It is done in Maptitude. It is a
9 custom report that we had built through
10 Maptitude to use.

11 Q Okay. And I want to ask you about
12 the various categories.

13 A Okay.

14 Q At least some of them. Now, one of
15 the things that the report appears to do is it
16 has a -- I think for each district the first
17 row is total population. The second row is
18 voting age population. Is that correct?

19 A Yes.

20 Q And what's the significance of
21 having both total population and voting age
22 population in there?

23 A We redistrict using total population
24 that all of it is included when you draw
25 districts for the size of the districts, but

1 sometimes to know the voting age population is,
2 you know, eligible pool of voters, so it's,
3 it's useful knowledge. People like to know how
4 many people are in that district are 18 and up
5 and eligible to vote.

6 Q Okay. And then it has a Deviation,
7 Deviation Percent, and what's the significance
8 of having that in there?

9 A Deviation is the whole number
10 figure, number of people away from what the
11 ideal district size is. If it's no sign, it's
12 above the ideal. If it's a minus number, it's
13 below the ideal. And the percent is just the
14 percentage of that.

15 Q Okay. And then why do you have
16 Black and Percentage Black total population and
17 voting population stats for each district?

18 A Because we have districts in Georgia
19 that are minority, majority-minority districts,
20 and so that gives us the ability to know which
21 districts those are.

22 Q Okay. And then what's Black Combo?

23 A Black Combo would be anyone who
24 filled out their census form and said that they
25 were black in combination with another race.

1 Q And then you have a Total Black, so
2 is that the Black plus Black Combo?

3 A It is. It would be equivalent to
4 the AP Black.

5 Q And then you have Percent Total
6 Black in addition to Percent Black; correct?

7 A Yes.

8 Q And when you're coming up with a
9 plan, do you pay more attention to the Percent
10 Black or to the Percent Total Black?

11 A So we pay attention to both, but
12 typically, we pay more attention to the Percent
13 Total Black.

14 Q And why is that?

15 A Because that would include anyone
16 who said that they were in any -- black in any
17 way, shape, or form, that they were or they
18 identified themselves as either all or part
19 black.

20 Q Okay. And then with respect to
21 Hispanic or Latino, why is that -- and Percent
22 Hispanic, why are those columns included here?

23 A They are included because they are
24 the, like I said, they are divided off because
25 of a different question, they being an

1 ethnicity and not the race category. But as
2 through the years Georgia has had an increasing
3 Hispanic population in certain areas, so that
4 would let us be able to see where that is.

5 Q In looking at -- did you consider at
6 all adding together or considering Percent
7 Black plus Percent Hispanic?

8 A No.

9 Q Why not?

10 A Well, as I've already explained,
11 Hispanic -- the Hispanic question is an
12 ethnicity, and so the people who are of that
13 category could also be any other race as well
14 as also identifying themselves as Hispanic. So
15 in all of my years working in this office,
16 we've never added the two together because it
17 would be like adding apples and oranges. They
18 are a race question versus an ethnicity
19 question.

20 Q Is your, is your Percent Black and
21 Percent Total Black, is that all black, or is
22 it black non-Hispanic?

23 A I would have to double-check. As
24 far as I'm aware, it would be all, and not the,
25 and not Hispanic.

1 (Whereupon a document was identified as
2 Plaintiff's Exhibit 16.)

3 Q Okay. All right. I'm going to mark
4 as Exhibit 16 a document that's numbered 1411
5 in the upper right-hand corner. Ms. Wright, do
6 you recognize this document?

7 A I do not.

8 Q Okay. Now, have you seen a report
9 like this before?

10 A No, not really. I mean --

11 Q Now, at the bottom of the page, it
12 says that it's a Report Prepared by the
13 Legislative & Congressional Reapportionment
14 Office; correct?

15 A Yes.

16 Q Now, at the top, it says the Plan is
17 House 06 and the Type is House and the User is
18 Staff. Is that -- what does that mean in the
19 context of your office when it says staff as
20 the user?

21 A It just means one of us did it.

22 Q Okay. And I know you're not
23 familiar with this particular document or this
24 particular report, but who would be the person
25 in your office that would be -- or people that

1 would be able to generate the report? I'm
2 talking about as of 2011.

3 A As of when in 2011? I mean, prior
4 to the redrawing or at the beginning or that
5 staff list you had earlier?

6 Q Let's, let's say at -- well, this
7 was part of the redistricting submission, so
8 October 21st, 2011.

9 A So it would be myself. It could be
10 Shantée El, Brian Knight, Dan O'Connor, Kade
11 Cullefer.

12 This looks like a custom report,
13 something that was probably either requested
14 or that someone wanted to have. This isn't
15 something that's a standard report. So it
16 would just be something that we put together
17 for someone probably. I would guess. That's
18 spec -- I'm just guessing. I don't know.

19 Q Have you ever seen a report like
20 this that has -- it looks like, on the
21 right-hand side, it looks like it has, in
22 addition to total population and voting age
23 population, numbers for African-Americans,
24 also of black reg 10 and a black reg 10
25 percent.

1 A Uh-huh (affirmative). I'm sorry.
2 What?

3 Q Have you seen a report like that
4 before that your office has created that blends
5 together total population and voting population
6 with black registration numbers for each
7 district?

8 A I don't see every custom report that
9 gets created, but this would be, you know, not
10 unlikely or unusual to see if someone requested
11 that information.

12 Q Okay. So I want to go back really
13 quickly to the submission document, which is
14 Exhibit 14. And if you go to page 1376 in
15 there and you look at A-6, and it references a
16 "summary statistical report showing black
17 population figures and voter registration for
18 the current plan, sorted by district."

19 Would you agree with me that
20 Exhibit 16 seems to be what they're referencing
21 here as Exhibit Number A-6?

22 A That seems likely.

23 MR. GREENBAUM: All right. Why
24 don't we take a break because the tape needs to
25 be changed.

1 THE VIDEOGRAPHER: Going off the
2 video record at 12:26 p.m.

3 (Proceedings in recess, 12:26 p.m. to
4 1:14 p.m.)

5 THE VIDEOGRAPHER: We are now back
6 on video record at 1:14 p.m. This is the
7 beginning of file number three.

8 (Whereupon a document was identified
9 as Plaintiff's Exhibit 17.)

10 Q All right. Ms. Wright, I'm going
11 to mark as the next Exhibit 17 a document
12 entitled Political Subdivisions Split Between
13 Districts for the House 2006 Plan.

14 Ms. Wright, do you recognize this
15 form of report?

16 A Yes.

17 Q Is this something that is created
18 by Maptitude?

19 A Yes.

20 Q And is this something that's
21 typically done when you are creating a
22 statewide plan?

23 A Not always, but occasionally.

24 Q Okay. And what's the significance
25 of showing how many sub -- how many

1 subdivisions are split and not split?

2 A This is showing the number of
3 counties that are split and then beneath that
4 the number of voting districts that are split
5 as well. And then below that it shows the ones
6 that are split that do not affect any
7 populations, so just to know those statistics.

8 Q So for the voting district split, do
9 you know if this was using the 2000 VTDs or the
10 2010 VTDs?

11 A If this is the, this is the 2006
12 version, I would assume that we ran this using
13 the 2010 geography, which would mean those were
14 the VTDs as of 2010, but I can't say that for
15 certain. It could be that they wanted to know
16 what it was when it was drawn. So we would
17 have used it on an older version, but I don't
18 have a way to know because Maptitude doesn't
19 designate it that way.

20 (Whereupon a document was identified
21 as Plaintiff's Exhibit 18.)

22 Q Okay. All right. I want to mark as
23 Exhibit 18 a document entitled Exhibit B - 2011
24 House Plan, Political Subdivision Split Between
25 Districts.

1 MR. WILL: Thank you, Joel.

2 THE COURT REPORTER: You're welcome.

3 Q Ms. Wright, do you recognize this
4 document?

5 A It's the same type of report run on
6 a different plan.

7 Q For the 2011 House Plan?

8 A Yes.

9 Q Okay. And when you're in the
10 process of creating a plan, do you also sort of
11 look at how many counties and voting districts
12 are being split?

13 A Not necessarily in the process.
14 Maybe at the end of when you've finished
15 working on a plan you might would run that,
16 kind of an end-of-the-process sort of review.
17 It's not really something you do in the middle.

18 Q And what are you looking for when
19 you do it at the end?

20 A Just the totals, total number that
21 you, that you would have split counties.
22 Sometimes you want to look at these subdivision
23 splits affecting no population to see if those
24 are done in a way that you could fix those,
25 that you could put those back together, make

1 that precinct whole for one reason or another.
2 You can -- sometimes you could catch a mistake
3 that way if there was a technical mistake.

4 Q And according to this, the 2000
5 House Plan had 191 split voting districts, and
6 25 of those affected no population; correct?

7 A That's what this says, yes.

8 Q And if I wanted to know, prior to
9 the 2015 House Plan, how many precincts were
10 split in Districts 105 and 111, could I look at
11 this report and find that out?

12 A If you wanted to know how many were
13 split in 105 and 111?

14 Q Yes.

15 A When it was drawn in 2011, you could
16 use this, yes.

17 Q Would I be able to use -- were those
18 precincts split up prior to 2015? Do you know?
19 Strike that.

20 Do you know if there were other
21 precincts that were split in 105 and 111 prior
22 to 2015?

23 A I'm not sure I understand the
24 question.

25 Q Okay. What I'm trying -- sorry.

1 What I'm trying to get at is, if I wanted to
2 know whether -- if I wanted to know whether
3 105 -- strike that.

4 105 and 111 did not change between
5 2011 and 2014; correct?

6 A The district lines you mean?

7 Q The district lines.

8 A Right, they did not change between
9 those years.

10 Q And you're not sure whether there
11 were precinct changes between 105 and --

12 A That's correct, I'm not sure, yeah.
13 (Whereupon a document was identified as
14 Plaintiff's Exhibit 19.)

15 Q All right. I'm going to mark as
16 Exhibit 19 a document that at the top says 2011
17 House Plan, and the first number on the right
18 hand corner is 1540.

19 MR. STRICKLAND: What is the number
20 on this again?

21 MR. WILL: 19.

22 MR. STRICKLAND: Okay.

23 Q Ms. Wright, have you seen this
24 document before?

25 A Possibly.

1 Q Okay. When it says plan name
2 hseprop1, what does that mean?

3 A That's referring to the plan for the
4 State House districts before it was adopted.

5 Q It's intended to be House proposed
6 one, is that what the shorthand's for?

7 A Right, House proposal one.

8 Q And House -- this plan was the plan
9 that went into effect in 2011; correct?

10 A I believe that is the case.

11 Q Okay. Also up at the top, it says
12 Administrator: H167. Do you know who that
13 might be in reference to?

14 A That would be Chairman Roger Lane.

15 Q And so does that mean that this
16 would be found in his folder?

17 A Yes, at that point.

18 Q Okay. And then at the bottom, it
19 says, Report Prepared by the Legislative &
20 Congressional Reapportionment Office. That's
21 the office that you worked in; correct?

22 A Yes.

23 Q And still work in to this day;
24 correct?

25 A Yes.

1 Q And is this document created in the
2 ordinary course of business of your office?

3 A No. I would think this was
4 probably a specially requested report. It's
5 not something we normally standard produce.

6 (Whereupon documents were identified
7 as Plaintiff's Exhibit 20, Plaintiff's
8 Exhibit 21, Plaintiff's Exhibit 22, and
9 Plaintiff's Exhibit 23.)

10 Q I'm going to go quickly through --
11 I'm going to show you four plans. I'm going
12 to mark the first as 20. It says Georgia
13 House of Representatives: 2006. The number in
14 the right-hand corner is 1388.

15 21 is marked in the upper
16 right-hand corner 1390, Georgia House of
17 Representatives: 2006.

18 1523, I want to mark as 21, and it
19 says proposed Georgia House Districts.

20 And then 22 has 1525 in the upper
21 right-hand corner, and it says
22 Exhibit B - 2011 House Plan.

23 And I don't have a full set of
24 copies for these documents.

25 MR. POWERS: Their formats -- we're

1 starting from 20.

2 MR. WILL: 20, 21, 22, 23.

3 MR. GREENBAUM: All right. So 1388
4 is 20; 1390 is 21; 1523 is 22; and 1525 is 23.

5 MR. WILL: Actually, you have a
6 set. Thanks.

7 Q All right. Ms. Wright, let's start
8 with Exhibit 20. Do you recognize number 20?

9 A Yes.

10 Q And what is it?

11 A That is the State House map from
12 2006.

13 Q Okay. And how about number 21?

14 A That is the same map zoomed in at
15 the Atlanta metro area.

16 Q And in this plan can you tell how
17 many House districts were in Henry County? I
18 count five.

19 A Six.

20 Q Six?

21 A Uh-huh (affirmative).

22 Q Can you name the six?

23 A 90, 91, 78, 109, 110, 73.

24 Q Okay. 78, 109.

25 A The oranges are similar, but the

1 one in 78 is a little darker.

2 Q So let's go back through that. So
3 you have 78, which is orange?

4 A Uh-huh (affirmative).

5 Q 109, which is a different type of
6 orange?

7 A Uh-huh (affirmative).

8 Q 91, which is purplish?

9 A Correct.

10 Q 90, which is blue?

11 A Blue.

12 Q 73, which is kind of a pinkish?

13 A No. It's white looking, or I guess
14 maybe it depends on your printer. Maybe it
15 was a pale pink. It looks white on mine.

16 Q Okay. And what's the sixth one?

17 A 110.

18 Q Oh, I see it in the green?

19 A Green.

20 Q All right. Thank you.

21 A Uh-huh (affirmative).

22 Q All right. And then moving on to
23 22, do you recognize that?

24 A I do.

25 Q What is it?

1 A This was the 2011 House map.

2 Q Okay. And then 23, do you
3 recognize that?

4 A Yes.

5 Q And what is that?

6 A The metro Atlanta zoom-in of that
7 same plan.

8 (Whereupon a document was identified as
9 Plaintiff's Exhibit 24.)

10 Q Okay. I'm going to mark as
11 Exhibit 24 a document entitled 2011 House map,
12 and I'm going to give you my version because
13 the other copies are messed up on the last
14 page.

15 MR. WILL: Thank you.

16 Q Ms. Wright, do you recognize this
17 document?

18 A Yes.

19 Q What is it?

20 A This is the stat sheet that
21 corresponds to the map that you showed me on
22 22 and 23.

23 (Whereupon a document was identified
24 as Plaintiff's Exhibit 25.)

25 Q Okay. Then I want to mark as 25 a

1 document entitled NAACP versus Kemp, Document
2 Production Volume 3, and at the top it says
3 it's page 8747, and then it says
4 J_4_2010_VTD_Layer_With_Gen.

5 And I will tell you that this comes
6 from a spreadsheet that was several hundred
7 pages long, and all I was interested in was
8 the headings. So I've just taken the
9 portions, the pages from the spreadsheet that
10 has the heading across the top.

11 Ms. Wright, have you ever seen a
12 spreadsheet that across the top has this level
13 of information and it appears that it has
14 election results in 2010 combined with racial
15 demographics with respect to registration?

16 A I have not seen this report before,
17 no.

18 Q Okay. Now, if -- when information,
19 when data information, comes from the
20 Secretary of State's Office to your office, is
21 that something that they would send the data
22 to Mr. Strangia who would then be the one that
23 would input the data?

24 A Yes.

25 (Whereupon a document was identified

1 as Plaintiff's Exhibit 26.)

2 Q Next, Ms. Wright, I am going to
3 show you a document, mark it as Exhibit 26.
4 It starts on page 9297 in the upper right-hand
5 corner and goes through 9347, and it says
6 House Prop1 Turnout Stats on the top of it.

7 And this, again, is a spreadsheet,
8 and so roughly every four pages across the top
9 you'll see headings. Have you ever seen a
10 spreadsheet like this before, Ms. Wright?

11 A I've seen the data but not a report
12 like this.

13 Q Okay. And this data, is it correct
14 to say that it has black and white and
15 Hispanic registration and turnout numbers?

16 A Let me look at it a minute.

17 Q Like I said, if you go every four
18 pages, you'll see the --

19 A Yes, that appears to be what it
20 has. I haven't gone all the way through it,
21 but.

22 (Whereupon a document was identified
23 as Plaintiff's Exhibit 27.)

24 Q Okay. Next document is 27. It's a
25 document entitled Core Constituencies Report.

1 Ms. Wright, does this document look familiar
2 at all to you?

3 A I know what it is. I don't recall
4 seeing it before, but that doesn't mean I
5 didn't, but I don't remember seeing it before.

6 Q Okay.

7 A But I know what it is.

8 Q What is it?

9 A It's a report, standard Maptitude
10 report, that you can run to compare a district
11 to another -- or a plan to another plan to see
12 how much of the district is within the
13 proposed district, you know, on that other
14 plan.

15 Q And is it your understanding that
16 this particular report that's in 27 is a
17 comparison between the 2011 House Plan and the
18 2006 House plan?

19 A That looks to be what it is, yes.

20 Q And then I want to, if you could go
21 to -- I'm going to ask you about 105 and 111.

22 A Oh.

23 Q I can't give you a page number in
24 terms of where they are, but the districts,
25 the districts are in order.

1 A Okay.

2 Q And with respect to House
3 District 105, would it be accurate to say that
4 House District 105 was taken from three
5 districts in the 2006 plan, Districts 104,
6 106, and 107?

7 A It's a little difficult to use this
8 report to compare two plans such as these
9 simply because your numbers of districts
10 change so drastically in the House based on
11 where the population growth is.

12 So House District 105 was a
13 district that was created there where there
14 was no incumbent. There was a new district
15 added to the county. So, of course, because
16 it was not previously existing where it is
17 now, it would be coming from three other
18 districts because it didn't come from itself.

19 Q Okay. And then moving on to 111,
20 is it the case that there were portions of six
21 districts in the 2006 plan that made up the
22 geography of House District 111?

23 A Yes. And that's the same situation
24 with 111 that was with 105. The district did
25 not previously exist there, so in order to

1 create a new district that was an open seat
2 that had no incumbent that had not previously
3 been in that location, all of that district's
4 population and area was taken from other
5 districts previously to create a new seat
6 there.

7 Q Do you recall when Representative
8 Strickland was first elected to the house?

9 A I believe he was elected in 2012.
10 The other thing to note with the
11 House districts in particular is that House
12 district numbering is redone when we redraw a
13 state map.

14 So whereas the Senate districts
15 maintain their numbers in wherever, you know,
16 they, they are, if the district relocates
17 because of growth in one part of the state,
18 the district number goes with where the new
19 district is.

20 The House does not do that. The
21 House, we start from the top left corner, and
22 we start renumbering again. So the numbers
23 oftentimes change significantly from one
24 decade to the next based on where the growth
25 is and where there are more districts

1 concentrated than before.

2 (Whereupon a document was identified as
3 Plaintiff's Exhibit 28.)

4 Q Thank you. I want to mark as
5 Exhibit 28 Georgia Cities by Legislative and
6 Congressional District. Ms. Wright, do you
7 recognize this document?

8 A I do.

9 Q What is it?

10 A This is our joint city report.

11 Q And what does it show?

12 A This would have been the version
13 that was done in 2012. It shows a list of all
14 the cities in Georgia and the House, Senate,
15 and Congressional districts that are within
16 that city.

17 Q So if you go to what would be the
18 seventh page, I'm interested in Lawrenceville.
19 And do -- and does this reflect the city of
20 Lawrenceville as divided up into six
21 districts?

22 A Yes.

23 Q And are you aware that the
24 population of Lawrenceville as of the 2010
25 census was less than 30,000?

1 A No.

2 (Whereupon a document was identified as
3 Plaintiff's Exhibit 29.)

4 Q I want to mark as Exhibit 29 the
5 2010 Democratic -- demographic profile for
6 Lawrenceville. Is it correct, Ms. Wright,
7 that the population of Lawrenceville as of the
8 2010 census was less than 30,000?

9 A Shows it to be so, yes.

10 Q And is it correct that it's about
11 the, population size, about the size of half
12 the district in terms of the population?

13 A More or less, yes.

14 Q Were you aware at the time that the
15 House plan was produced that the mayor of
16 Lawrenceville objected to the dividing of
17 Lawrenceville into six districts?

18 A No, I was not.

19 Q Were you aware that in -- strike
20 that.

21 Did you go to any of the hearings
22 that the General Assembly held with respect to
23 the 2011 plan?

24 A Yes.

25 Q Do you recall at any of those

1 hearings anybody raising the issue of the
2 division of Lawrenceville into multiple
3 districts?

4 A No.

5 (Whereupon a document was identified as
6 Plaintiff's Exhibit 30.)

7 Q I want to mark as Exhibit 9
8 excerpts of --

9 MR. POWERS: 29.

10 Q 29, I want to mark as Exhibit 29 --

11 MR. WILL: How about 30? That last
12 one was 29.

13 MR. POWERS: Oh, okay.

14 MR. GREENBAUM: All right. Sorry.

15 MR. WILL: No problem.

16 Q I want to mark as Exhibit 30
17 excerpts of the meeting -- the transcript of
18 the Meeting of the Georgia House of
19 Representatives Reapportionment Committee on
20 August 6th, 2011.

21 Ms. Wright, do you recall one way
22 or the other whether you attended that
23 meeting?

24 A I do not recall.

25 Q Okay. I want to -- if you'll look

1 at, using the pages on the bottom right, if
2 you look on the bottom of page 177 and up to
3 page 178, there's a gentleman named Lee
4 Thompson.

5 MR. STRICKLAND: Wait a minute.
6 Could you give those page numbers again?

7 MR. GREENBAUM: Yes. Bottom of 177
8 onto 178.

9 MR. STRICKLAND: Sorry.

10 MR. WILL: It's the transcript page
11 177. It's 2190 Bates stamp.

12 MR. STRICKLAND: Got it.

13 Q And you see that he testified that
14 Lawrenceville had currently been contained in
15 one legislative district? Do you see that?

16 A Uh-huh (affirmative).

17 Q Do you recall whether you attended
18 the meeting?

19 A I do not.

20 Q Okay. And it noted the
21 demographics of Lawrenceville being 38 percent
22 white, 31 percent African-American, 22 percent
23 Hispanic. Do you see that?

24 A Uh-huh (affirmative), I do.

25 Q And you see the statement that the

1 city has been divided into six legislative
2 districts?

3 A Yes.

4 Q And that's in fact what happened
5 was that the city was divided into six
6 legislative districts?

7 A Is that a question?

8 Q Was the city divided into six
9 legislative districts in fact?

10 A Yes.

11 Q And is it a fair characterization
12 of Mr. Thompson's testimony that he was
13 opposed to the city of Lawrenceville being
14 divided into several districts?

15 A It appears that he did not like it
16 being divided into that many districts, yes.

17 MR. GREENBAUM: Thank you.

18 MR. POWERS: Can we go off the
19 record for just a second?

20 THE VIDEOGRAPHER: Going off video
21 record.

22 (Whereupon off-the-record discussions
23 ensued.)

24 THE VIDEOGRAPHER: Back on video
25 record.

1 (Whereupon a document was identified as
2 Plaintiff's Exhibit 31.)

3 Q Ms. Wright, I want to show you a
4 document entitled Georgia House Districts -
5 2012.

6 MR. POWERS: Is there an extra?

7 MR. WILL: Yes, sir.

8 Q Ms. Wright, do you recognize this
9 document?

10 A Yes.

11 Q What is it?

12 A This would be the State House map
13 after changes were made during session,
14 regular session of 2012.

15 Q And the map, there appears to be a
16 state map and then following it a series of
17 regional maps; is that correct?

18 A Yes.

19 Q And then the demographic data and a
20 report following that?

21 A Yes, that's correct.

22 Q All right. All right. We're going
23 to start looking at the big plans now, the
24 2012 plan. I'm going to -- we'll start with
25 Gwinnett County on Exhibit 3. And,

1 Ms. Wright, according to the 2012 plan,
2 Exhibit 3, and pre -- and District 105, what,
3 what precincts were split in District 105?

4 A Baycreek H, Lawrenceville M, and
5 Lawrenceville D.

6 Q Do you know why Baycreek H, why
7 that precinct was split?

8 A Population would be my only
9 justification for that.

10 Q So only to keep population equal?

11 A I would think so, yes.

12 Q How about with respect to
13 Lawrenceville M?

14 A Most likely the same thing, but I
15 can't say that. I mean --

16 Q And how about Lawrenceville D?

17 A The same most likely, for
18 population reasons.

19 Q Okay. Do you, do you have a way
20 of -- is there a report that you can generate
21 that would show for split precincts what the
22 demographics are in terms of, you know, let's
23 take Lawrenceville D, for example, what the
24 population including the racial demographics
25 are in the 104 section of Lawrenceville D

1 versus the 105 section of Lawrenceville D?

2 A I'm not aware of a basic report we
3 have to do that.

4 Q Do you, do you know who made the
5 decisions in terms of splitting those
6 precincts in 2012?

7 A I do not.

8 Q All right. Let's, let's move on to
9 the Henry County 2012 map.

10 MR. WILL: You see it okay?

11 THE WITNESS: It's okay.

12 Q And I take it you might be more
13 familiar with Henry County in the 2011/2012
14 time, those plans, with respect to 111 than
15 you were with Gwinnett?

16 A Probably so, yes.

17 Q Okay. And then what precincts in
18 Henry County were split? Strike that.

19 What precincts in District 111 were
20 split?

21 A McDonough Central, North Hampton.
22 That looks to be the only two that I can see.

23 Q How about Grove Park?

24 A No, it was not split. Well, that's
25 the little quirk thing. Yeah, I guess it is

1 split with the precinct line and the city
2 limit thing. That's -- I don't know that
3 there were any population involved in that
4 area, but it's a --

5 It is a little bit of a line issue
6 there with the way the precinct line falls on
7 the new version. I think we had some
8 corrections with, with that with the city
9 limit line.

10 Q So in terms of Grove Park, part of
11 the explanation might have had to do with the
12 city limits in terms of why that precinct was
13 split?

14 A Yes.

15 Q What about the split with North
16 Hampton?

17 A That too was population related, I
18 believe.

19 Q And then what about McDonough
20 Central?

21 A I think that was also population
22 related.

23 (Whereupon a document was identified
24 as Plaintiff's Exhibit 32.)

25 Q I'm going to mark as Exhibit 32 a

1 one-page spreadsheet, and this is something
2 that the Plaintiffs have created that attempts
3 to show for 2012 in 105 and 111 what the
4 demographics were of each precinct.

5 Now, according to this -- we'll
6 start with Baycreek H -- and actually we'll
7 start with Lawrenceville D. And you see that,
8 as you said, it's split between 104 and 105.

9 And if you look way over in the
10 bottom right-hand -- not the bottom, but all
11 the way in the right-hand side, it has the Any
12 Part Black VAP numbers. Yeah, if you need
13 to -- if you need to look at that, that's
14 fine.

15 And according to this, the black
16 population for this split precinct that is in
17 104 has a higher percentage than the black
18 population for Lawrenceville D that is in 105.
19 Do you know one way or the other if that was
20 in fact the case for the 2012 plan?

21 A I do not know.

22 Q Okay. So you don't, you don't have
23 any cause to know one way or the other whether
24 these numbers are correct?

25 A No, I don't.

1 Q Okay. And then, you know, at the
2 bottom for District 105, you have
3 Lawrenceville M, and, again, that's, that is a
4 split precinct. And according to this, the
5 percentage of black population that is in the
6 104 section of Lawrenceville M is higher than
7 the percentage of black population that is in
8 the 105 portion of Lawrenceville M.

9 Do you have reason to know one way
10 or another whether these numbers are accurate?

11 A No, I don't know.

12 Q Okay. Okay. So let's, let's move
13 to, let's move to Henry County. I want to
14 focus on the North Hampton split between 73
15 and 111.

16 And according to this, the black
17 population -- the percentage of black
18 population in the District 73 portion of North
19 Hampton is, if I'm reading this right, about
20 40 percent, and for that of the 111 portion,
21 it's 28.5 percent; is that correct?

22 A That's what this report shows.

23 Q Okay. And, you know, looking at
24 North Hampton, the North Hampton precinct, can
25 you -- okay.

1 Do you have an understanding in
2 terms of, in that North Hampton area, where
3 the black population is primarily housed?

4 A No, I don't know that.

5 MR. GREENBAUM: Okay. You know
6 what? Can we take, can we take a two-minute
7 break --

8 MR. STRICKLAND: Sure.

9 MR. GREENBAUM: -- to get
10 reorganized a little bit?

11 THE VIDEOGRAPHER: Going off the
12 video record at 2:00 p.m.

13 (Proceedings in recess, 2:00 p.m. to
14 2:10 p.m.)

15 THE VIDEOGRAPHER: Okay. We are
16 now back on video record at 2:10 p.m.

17 (Whereupon a document was identified as
18 Plaintiff's Exhibit 33.)

19 Q Ms. Wright, I am going to mark as
20 Exhibit 33, it's a chain of four pages of
21 emails numbered in the upper right-hand corner
22 1065 to 1068. Ms. Wright, do you recognize
23 this email chain?

24 A Yes.

25 Q And what is this email chain

1 concerning?

2 A This is emailing with the Secretary
3 of State's office to, to obtain -- the process
4 of obtaining the, the file for them for, looks
5 like, the 2014 layer, precinct layer.

6 Q Okay. So the first, the first one
7 of these emails is on October 21st, 2014; is
8 that correct?

9 A Yes.

10 Q And it's sent from you to Linda
11 Ford and Erica Hamilton. Who are Ms. Ford and
12 Ms. Hamilton?

13 A Linda Ford was the director of
14 elections for the Secretary of State at that
15 time, and Erica Hamilton worked in the
16 elections office there.

17 Q Okay. So I'll ask you some things
18 about this initial email. It talks about
19 wanting to go ahead and put in the request for
20 the 2014 election data in the same format as
21 usual. What, what's the format?

22 A I don't know.

23 Q Mr. Strangia would be the person?

24 A They knew -- right, because every
25 two years we would request that file, so they

1 knew what it was that we needed from them, so.

2 Q And so typically the Secretary of
3 State's office and Strangia would work out the
4 details. You just knew that it was a standard
5 file that was sent to Mr. Strangia to input
6 after every election. Correct?

7 A Right.

8 Q In the second paragraph towards the
9 end, you say, "it is most important this year
10 especially that we have the file before the
11 end of the calendar year." Why was it
12 especially important in 2014?

13 A Where are you?

14 Q On the bottom of 1067.

15 A We've typically had difficulty
16 getting the file from them so that we can have
17 that into our system in time to review, and if
18 the members want to review that for whatever
19 purposes, they like to see the data following
20 an election.

21 By asking for it by the end of the
22 calendar year, I had hoped that that would
23 speed along the process and get the file to us
24 quicker. I'm not so sure that it worked, but
25 it was an attempt.

1 MR. WILL: That was the plan.

2 THE WITNESS: That was the plan.

3 Q Was, was -- did any -- strike that.

4 By October 21st, were you aware

5 that some legislators wanted to do a

6 redistricting after the 2014 election?

7 A At that point, I knew they wanted

8 to review the data.

9 Q Now, you mentioned before that the

10 incumbent in District 105, Ms. Chandler,

11 before the election had indicated to you that

12 she was interested in redistricting her

13 district; correct?

14 A Correct.

15 Q Had there been other legislators

16 that had reached out to you in terms of

17 expressing interest in a redistricting in

18 2015?

19 A I believe there were. Like I said,

20 there were some who wanted to look at the

21 data, so I believe there were several who --

22 I'm not sure who exactly, but there were some,

23 I think, that just wanted to be able to see

24 that.

25 Q Okay. If they wanted to see it,

1 would they necessarily reach out to you, or is
2 it possible they could have reached out to
3 someone else in your office?

4 A It's possible they could have
5 reached out to someone else in the office.

6 Q Is there a standard operating
7 procedure with respect to that?

8 A No.

9 Q Now, in the last sentence in the
10 first paragraph of the next page, 1068, it
11 says, "We simply cannot wait until March to
12 get this data knowing we need the time to
13 allocate this to our geography and be able to
14 review it before session."

15 Why was it important that it be
16 reviewed before session?

17 A Well, as you just said, you alluded
18 to the fact there were members who wanted to
19 review the data, so if they were going to
20 review the data, see if there was anything
21 that was concerning to them, they wanted to
22 have that while they were in session.
23 Otherwise, it wouldn't be -- there would be no
24 time to do anything if they wanted to.

25 Q All right. So you get a response

1 back from Merritt Beaver; is that correct?

2 A Yes.

3 Q On the 22nd. And what was
4 Mr. Beaver's role in the Secretary of State's
5 office?

6 A He's the chief information officer
7 for Secretary Kemp, or he was. I assume he
8 still is.

9 Q And then you email him back on
10 December 5th seeking to follow up, correct,
11 because you hadn't gotten a response?

12 A Yes, that's correct.

13 Q And then he gets back to you on the
14 17th of December and says they're hoping to
15 have it complete by the end of the month;
16 correct?

17 A Yes.

18 Q Okay. And then he gets back to you
19 on January 7th; correct?

20 A Yes. There could have been an
21 email between the two where I was not copied
22 it looks like. I don't know that for a fact,
23 but I would assume so because he's referring
24 to precinct name differences that we had.

25 (Whereupon a document was identified as

1 Plaintiff's Exhibit 34.)

2 Q Okay. Then I'm going to mark as
3 the next exhibit, I think it's 34. Thank you.
4 I want to mark as Exhibit 34 a document that
5 is numbered in the upper right-hand corner
6 1059 to 1063.

7 Actually, I'm going to go ahead
8 and, before you look at that, finish up with
9 33, the document that you were just looking
10 at.

11 Cooley ultimate -- Gary Cooley,
12 who's assistant programmer for the Secretary of
13 State; correct?

14 A He was, yes.

15 Q And he says that he attaches the
16 general election results and voter
17 registration demographic and voting history
18 numbers by precinct; correct?

19 A Yes, that's what he says.

20 Q And as far as you know, is this the
21 standard report that you get after every
22 election?

23 A As far as I know, I guess, yes. I
24 don't know.

25 Q And I assume that you --

1 Mr. Strangia is cc'd on this. As far as you
2 know, he didn't have to do any further
3 follow-up in terms of this report?

4 A We have had several times, when we
5 obtained the file, we've had problems with the
6 file. We've had to go back and forth several
7 times with them to make the correction, and
8 that's some of what this is here, I think,
9 that there was a problem with it. I don't, I
10 don't know if there was additional issues that
11 they had to reconcile.

12 Q Okay. All right. So I'm going to
13 move on to 34 now. And this is two pages of
14 emails followed by a four-page report titled
15 Voter Registration System, Active Voters By
16 Race and Gender Within County. And this is,
17 this is a --

18 Do you recognize this document,
19 this document, Ms. Wright?

20 A I know what it is, yes.

21 Q Okay. And as well as do you
22 recognize the emails that precede it?

23 A I don't, actually.

24 Q Okay. But as far as you know,
25 these -- you did send -- strike that.

1 Do you have any cause to believe
2 that you didn't in fact send and receive these
3 emails?

4 A Say that one more time?

5 MR. WILL: I'm sorry. I didn't get
6 it either.

7 Q Yeah. What I'm trying to get is:
8 You don't recall sending and receiving these
9 emails, but given the fact that it has your
10 name sending and receiving these emails, you
11 don't have any cause to believe that you
12 didn't send and receive them; correct?

13 A Correct.

14 Q All right.

15 A It was apparently a request for
16 someone who asked for it, so I mediated on
17 behalf of whichever member asked for it.

18 Q Okay. So as far as you know, there
19 was a member that asked for that document?

20 A That's what it says in the email.

21 Q Okay.

22 A I'm just referring to -- I don't
23 know.

24 Q Yes. And you don't happen to
25 remember which member asked for it, do you?

1 A I don't.

2 Q And do you know why in 2014 they
3 were interested in knowing the active voters
4 by race and gender for each county for 2010?

5 A I do not know. We have some
6 members who are interested in all that sort of
7 thing, so I have no idea.

8 (Whereupon a document was identified as
9 Plaintiff's Exhibit 35.)

10 Q All right. Thank you. Okay. Next
11 is 35.

12 All right. Now is the point where
13 we're going to be asking you to fish out of
14 the big pile 112 and 113, if you would look in
15 the bottom right-hand corner. And there's a
16 stapler here.

17 MR. WILL: It's right in front of
18 you.

19 A Is that the GA --

20 Q Uh-huh (affirmative).

21 MR. STRICKLAND: You going by the
22 number on the bottom?

23 MR. GREENBAUM: We're going to use
24 the numbers on the bottom where it's the GA.

25 Q And why don't you go ahead and

1 staple those two pages.

2 A Which? 12 and 13?

3 Q 12 and 13, 112 and 113. And we're
4 going to call GA 112 and 113 Exhibit 35.

5 Do you recognize this document,
6 Ms. Wright?

7 A I do.

8 Q And could you say who Mr. Rutledge
9 is?

10 A He is the representative from
11 District 109.

12 Q And his email from -- his first
13 email from February 27th says Subject is
14 redistricting and then it says, "Hey, just
15 checking to see where we are with it. Been
16 crazy this week."

17 When he says "where we are with
18 it," is he referring to a new redistricting
19 plan?

20 A He was referring to whether or not,
21 if I recall correctly, whether or not we
22 were -- because we had -- we were looking at
23 the data and looking at the district at that
24 point to see if there was anything to be done.

25 Q And what was Mr. Rutledge

1 interested in with respect to District 109?

2 A He had previously inquired about
3 the political data of his district and the
4 surrounding districts, for Representative
5 Strickland's district in particular and his
6 own, so this was a follow-up, I think, to that
7 to see if there was any -- what the data would
8 reveal.

9 Q And why was he interested in
10 Representative Strickland's district?

11 A His, his district borders
12 alongside -- Strickland's and Rutledge's
13 districts border alongside each other, and
14 politically they were concerned about
15 maintaining that district for Representative
16 Strickland if he could get reelected.

17 Q And in 2014, Representative
18 Strickland had a relatively close race;
19 correct?

20 A I believe so.

21 Q And is it correct that he ran
22 against an African-American Democratic
23 candidate in that election?

24 A I think that's incorrect.

25 Q Okay. You think it was a white

1 Democratic candidate?

2 A Yes.

3 Q When -- do you recall who
4 Representative Strickland ran against in 2012?

5 A As far as their name or what do
6 you --

7 Q Well, we'll start with their name.
8 Do you recall if he ran against an
9 African-American candidate or white candidate
10 in 2012?

11 A I believe it was an
12 African-American candidate in '12.

13 Q And do you know if that election
14 was close as well?

15 A I don't think that it was as close
16 as the '14 election, but I don't remember the
17 specific numbers.

18 Q Now, Representative Rutledge in
19 111, how closely was his election contested in
20 2014?

21 A Representative Rutledge is 109. I
22 don't know the numbers for his reelections. I
23 don't know that he had opposition in all of
24 those years either.

25 Q Okay. Did Representative Rutledge

1 ever suggest that you could change the
2 composition of his district to help
3 Representative Strickland in his district, win
4 reelection in his district?

5 A Yes.

6 Q What did he tell you specifically?

7 A He didn't tell me anything
8 specific.

9 Q Did any of the other legislators in
10 Henry County suggest to you that you could
11 change the composition of their districts to
12 help out Representative Strickland?

13 A Yes.

14 Q What other legislators did?

15 A Representative Welch. And I don't
16 know that I had conversations with
17 Representative Knight and Representative Yates
18 prior to making any changes or looking at the
19 map, but they were willing, from what I
20 understood, to help him if there was something
21 they could do.

22 Q Okay. Did -- during this time
23 frame, did Representative Strickland ever meet
24 with you in your office?

25 A Yes.

1 Q How about Representative Rutledge?

2 A I don't recall.

3 Q Do you recall any of the
4 legislators in -- from Henry County suggesting
5 particular changes to you?

6 A No.

7 Q It never happened, or you just
8 don't recall it?

9 A It never happened.

10 Q So they entrusted you to make the
11 specific changes?

12 A Yes.

13 (Whereupon a document was identified as
14 Plaintiff's Exhibit 36.)

15 Q Okay. All right. I want to mark
16 as Exhibit 36 kind of a series of election
17 results from 2014 involving seven districts
18 that we've been talking about, the five from
19 Henry County, District 73, District 109,
20 District 110, District 111, District 130, and
21 then from Gwinnett Districts 104 and 105.

22 MR. STRICKLAND: That's not out of
23 the big stack?

24 MR. GREENBAUM: Not out of the big
25 stack.

1 MR. STRICKLAND: Okay.

2 MR. GREENBAUM: We're going back to
3 the big stack though.

4 MR. STRICKLAND: All right.

5 MR. GREENBAUM: Just not right now.

6 Q So, Ms. Wright, when you were
7 looking at doing the redistricting in Henry
8 County in 2015, did you pay attention to what
9 had happened at the precinct level in 2014?

10 A Yes.

11 Q And so -- and this answers one of
12 our questions with respect to Mr. Rutledge
13 that in fact Mr. Rutledge, this is on the
14 second page, that Mr. Rutledge did not have an
15 opponent in 2014; correct?

16 A Yes.

17 Q And also Representative Knight in
18 District 130 didn't have an opponent either;
19 correct?

20 A Yes.

21 Q Representative Welch did, and he
22 won by about 1,600 votes; is that correct?

23 A That appears to be correct.

24 Q And then -- or actually this, this
25 only reflects the results within Henry County.

1 It wouldn't reflect the full results of the
2 election. Correct?

3 A Yes, I see those are just the Henry
4 precincts listed.

5 Q Okay. So let's, let's go to the
6 page, I think it's the fourth page, involving
7 District 111. And let me ask you about a
8 couple of the precinct results.

9 Is it fair to say that
10 Representative Nichols received the
11 predominant amount of the vote in Stockbridge
12 west of the precinct?

13 A Mr. Nichols --

14 MR. WILL: Mr. Nichols --

15 A -- isn't a representative.

16 Q All right. I'll reask the
17 question.

18 MR. WILL: I just wanted to make
19 sure you're asking -- which one you're asking
20 about, representative or Mr. Nichols.

21 THE WITNESS: And I wasn't sure
22 which one you're asking either.

23 Q Yeah, okay. So we're talking about
24 111 in 2014, and it's Candidate Nichols
25 running against Representative Strickland, and

1 I want to focus on the Stockbridge West
2 precinct.

3 And is it correct that Candidate
4 Nichols received 1,220 votes and Candidate
5 Strickland, the incumbent, received 265 votes?

6 A That's correct.

7 Q Is it fair to say that that
8 precinct was the precinct in which
9 Representative Strickland had the weakest
10 performance?

11 A Yeah, that looks to be true.

12 Q When you sought to redistrict
13 District 111 in 2015, were you conscious of
14 the fact that the Stockbridge West precinct
15 was the precinct in which Strickland had
16 performed the worst in 2014?

17 A I'm not certain that I knew it was
18 his worst precinct, but I knew that it was a
19 precinct that Mr. Nichols won.

20 Q And did you know that Mr. Nichols
21 had won it by a relatively significant amount?

22 A I may have realized that then, but
23 I don't know now whether I -- what I, what I
24 was looking at then.

25 Q Yeah. Were you conscious when you

1 were redistricting in 2015 to take that
2 precinct out of District 111?

3 A Well, if you were looking at the
4 map to do that, that precinct is on the very
5 northern tip of the map with one precinct
6 above it, so because of the shape of the
7 district as well as the fact that that was a
8 Democratic precinct, it was sort of an obvious
9 precinct to move.

10 Q Particularly if the goal of the
11 redistricting was to make Representative
12 Strickland's seat safer; correct?

13 A Correct.

14 Q And were you aware of the racial
15 demographics of that precinct?

16 A I can't recall if I -- what I knew
17 of the racial demographics of the precinct.

18 Q Okay. And you testified earlier
19 that you were aware that the northern part of
20 the county in the part of the county closest
21 to Clayton County had grown the most since
22 2000 and also had the largest concentrations
23 of African-Americans; correct?

24 A That's correct.

25 MR. WILL: Object to the form of

1 the question. You can answer.

2 A Yes. But I would also say that, of
3 those two precincts in this area, as I said
4 before, to take out Stockbridge West, you
5 would also have to take the precinct that is
6 above it, which Representative Strickland
7 actually won although it is a precinct in this
8 area that is more diverse.

9 Q Which precinct is that?

10 A That would be Stagecoach.

11 Q And is it correct that
12 Representative Strickland won Stagecoach by 43
13 votes but lost Stockbridge West by 945 votes?

14 A That appears to be the numbers,
15 yes.

16 Q So going back to Exhibit 35, which
17 is your email correspondence with
18 Representative Rutledge, you responded to him
19 saying that you expected that there could be a
20 bill next week but you weren't a hundred
21 percent sure.

22 When -- do you recall when you
23 finished the map for the entire House bill?

24 A I don't recall.

25 Q Do you recall whether it was the

1 week after February 27th, 2015?

2 A I don't recall.

3 Q Okay. How did -- so when does the
4 legislation, when does the legislative session
5 start and end in Georgia?

6 A It starts on the second Monday in
7 January, and when it ends, nobody knows. They
8 set a calendar when they start the session to
9 figure out -- well, they set part of the
10 calendar, and they figure it out as they go.

11 Q With respect to a regular session,
12 at what point does -- do you know at what
13 point there needs to be a bill in order for it
14 to be considered in that session?

15 A That varies every year.

16 Q When you went, when you went ahead
17 and created what you thought was the final
18 plan, did you, did you show it -- who did you
19 show it to?

20 A The final plan that would have been
21 whatever we were going to use in the
22 legislation would only be a map that included
23 the districts that were affected, so on this
24 particular bill, it would be 17 districts on a
25 map, a blank map of Georgia.

1 I'm pretty sure at that point the
2 only person I recall showing that to in its
3 entirety was Chairman Nix.

4 Q And would it be -- was, was this
5 something that you showed him a hard copy of
6 it? You -- he came to your office, or you
7 went to his office? How does that work?

8 A I don't recall. Could have been
9 either. Could have been both.

10 Q So in terms of actually working on
11 a plan, is that something that you have to do
12 in your office, or are you able to be mobile
13 and to, for example, work on a laptop?

14 A I have the capability of working
15 remotely on my laptop.

16 Q In 2015, do you recall, do you
17 recall working remotely on this particular
18 plan?

19 A I don't recall doing that, no.

20 Q Would it be fair to say that the
21 majority of the time you tend to work on the
22 plan in your office?

23 A Yes.

24 Q And in terms of working on the plan
25 in your office, how many people are you able

1 to fit in the room that can be looking at the
2 plan while you're working on it?

3 A We have a conference room that
4 would seat -- it's not as big as this. It
5 probably -- it's held quite a few before, but
6 I think there's maybe ten chairs in the room.

7 Q All right. So with this -- when
8 you show the plan to Chairman Nix, what you
9 thought was a final plan, did Chairman Nix
10 have any changes?

11 A Not that I know of.

12 Q Did he have any comments about it?

13 A I don't recall. Members would meet
14 with him throughout the process, if I worked
15 on an area for a certain member. This
16 particular legislative plan was left open for
17 all members to participate in, so that was
18 given to both, both parties, all 180 house
19 members.

20 So they would participate. They
21 would come to see us on their own. If they
22 wanted to draw something, then they were given
23 the instruction to take whatever it is that
24 they -- whenever they finalized what their
25 portion would be, to take that to the chairman

1 and show that to him.

2 So he had had discussions with the
3 other members on his own. I wasn't privy to
4 those conversations. I would just get the,
5 this is what they want and this is what they
6 want to use, if that was what they decided
7 upon.

8 Q And would he ever communicate --
9 how would he communicate with you? Would he
10 ever communicate by email?

11 A Who?

12 Q Nix.

13 A I don't recall very many emails
14 with him. We would talk in person.

15 Q And then would his -- to what
16 extent would his staff be interacting with
17 you?

18 A Very little.

19 MR. GREENBAUM: Okay. All
20 right. Why don't we take a break since we're
21 running out of tape.

22 THE VIDEOGRAPHER: Going off video
23 record at 2:46 p.m.

24 (Proceedings in recess, 2:46 p.m. to
25 2:56 p.m.)

1 THE VIDEOGRAPHER: We are now back
2 on video record at 2:56 p.m. This is the
3 beginning of file number four.

4 Q All right. Great. So I'm going to
5 ask you to go back into the GA documents, and
6 page three and page four, I want you to pull
7 those out.

8 A This one?
9 (Whereupon a document was identified as
10 Plaintiff's Exhibit 37.)

11 Q Yes. And then go ahead and staple
12 that, and that will be Exhibit 37.

13 And, Ms. Wright, who is Donna
14 Yeomans?

15 A She is the committee secretary in
16 the Senate to -- at that time she was with
17 Senator Crane.

18 Q And in terms of the process in
19 2015, did the bill go to the House first or to
20 the Senate first?

21 A The bill for the House districts --

22 Q Yes.

23 A -- started in the House.

24 Q Okay. And so this, this email
25 talks about the meeting for the Senate being

1 on March 26th, 2015, so by then, the bill had
2 already passed the House; correct?

3 A Yes.

4 Q So sometime between February 27th
5 and March 26th, the bill was introduced into
6 the House and was passed by the House;
7 correct?

8 A It's my recollection it passed the
9 House on March 11th.

10 Q March 11th?

11 A That's my daughter's birthday.

12 Q Okay.

13 A Passed the House unanimously --

14 Q Okay.

15 A -- on my daughter's birthday.

16 Otherwise, I would not remember that date.

17 Q Totally understandable. And in the
18 House, do you recall there being any hearings
19 prior to the House passing the bill?

20 A It was heard in committee just like
21 any other bill.

22 Q Do you -- did you attend a
23 committee hearing on it?

24 A Yes.

25 Q Did you discuss the bill during

1 that committee hearing?

2 A I did not make any comment during
3 that hearing.

4 Q And was there only one committee
5 hearing in the House?

6 A As far as I recall, there was one
7 meeting for the House committee.

8 Q How about in the Senate?

9 A I believe there was only one
10 meeting for the Senate committee as well.

11 Q And you mentioned before it passed
12 unanimously in the House. Was that true in
13 the Senate too?

14 A No, it was not.

15 Q What was the vote in the Senate?

16 A I don't recall specifically.

17 Q How -- do you recall how it broke
18 down on partisan lines?

19 A I think it was a combination. I
20 think most Republicans voted for it,
21 maybe almost all of the Republicans voted for
22 it. Some Democrats voted for it. Some voted
23 against it. I believe there was one
24 Republican -- I don't know. I better not
25 speculate.

1 Q And -- strike that.

2 Were there any changes from what
3 you considered to be your final map when you
4 presented it to Chairman Nix to the time in
5 which it was enacted as law?

6 A The very first version changed when
7 the committee heard the bill. If I recall
8 correctly, two districts were taken out, two
9 were added in. There were two members who
10 wanted to make a change kind of at the last
11 minute.

12 Those were added into the bill, and
13 the other two, who had decided they just
14 weren't going to worry with it, took theirs
15 out. And that happened in the version that
16 was passed in committee.

17 Q In the House?

18 A In the House committee.

19 Q During the course of time were
20 there any changes to Districts 105 and 111
21 from the time you presented the plan to
22 Chairman Nix to the time in which the bill was
23 enacted into law?

24 A Not that I recall.

25 I'd like to clarify that I only

1 presented him the map, not the bill. He has
2 to go and make the bill himself.

3 (Whereupon a document was identified
4 as Plaintiff's Exhibit 38.)

5 Q Fair enough. All right. I want to
6 mark as Exhibit 38, now you're going to be
7 taking pages 26 and 27 out and stapling them.

8 Ms. Wright, who's Steve Henson?

9 A Steve Henson is a senator who is
10 the Democratic leader in the Senate.

11 Q And do you recall seeing this email
12 prior to today?

13 A I did see it prior to today, yes.

14 Q When did you see it?

15 A When we were compiling the
16 information for your subpoena.

17 Q During the course of the 2015
18 redistricting plan, did you consult at all
19 with Mr. O'Connor?

20 A Can you ask that again?

21 Q Yes. During the development of the
22 redistricting plan that was passed in 2015,
23 did you consult with Mr. O'Connor at all?

24 A What do you mean by consult? I
25 mean, I speak with him pretty much daily.

1 He's on my staff.

2 Q Fair enough. What role, if any,
3 did Mr. O'Connor play in the 2015
4 redistricting plan?

5 A I don't recall discussing the
6 boundary lines or the proposed boundary lines
7 with him.

8 Q How about anything else with
9 respect to the plan?

10 A I don't recall.

11 Q So you could have, you could have
12 had discussions with him about the plan? You
13 just don't remember one way or the other?

14 A It's possible.

15 Q Okay. Do you know why in, in this
16 email Mr. O'Connor is sending Mr. Henson a
17 combination of partisan electoral results and
18 racial demographics of districts --
19 District 105?

20 A I would assume that the map
21 being -- he asked for the map, and perhaps in
22 conversation after delivering the map, he
23 asked for additional information.

24 Q Were you aware that with respect to
25 District 105 that the black population of

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.

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

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.

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

1 email?

2 A The chairman had been approached by
3 a reporter. She asked about the process and
4 House Bill 566 and the claim of the minority
5 vote dilution. He was drafting a response and
6 wanted my input as well as Spiro Amburn's.

7 Q Did you have an understanding of
8 what Senator Fort's position was?

9 A I did not hear the news conference
10 where he made whatever the claims that he made
11 in that conference. I did have some
12 conversation or was present for some
13 conversations that he had during the process
14 of the bill, which initially were not related
15 to the districts in Henry County or Gwinnett
16 County. They were primarily focused on two
17 House districts in Atlanta.

18 So I don't know what he said in
19 that news conference, but I knew that he had,
20 he had issue with the bill for his own
21 reasons, and apparently that's what she was
22 asking about for her report, so the chairman
23 was just wanting to respond.

24 Q Did you have an understanding that
25 Senator Fort was concerned about the changes

1 that the bill made to District 105?

2 A Initially, no, but later on it
3 was -- he made statements and whatnot about
4 that, so I heard about it later on.

5 Q Now, when did, when did the bill
6 pass the Senate?

7 A I don't know the specific date. I
8 believe it was the end of March.

9 (Whereupon a document was identified
10 as Plaintiff's Exhibit 41.)

11 Q I'm going to mark as Exhibit 41,
12 and I'm sorry that I do not have -- oh, wait.
13 I have it right here. Georgia Cities By
14 Legislative and Congressional District.

15 MR. WILL: Is that a different one
16 than we already put in?

17 MR. GREENBAUM: Yes.

18 Q Ms. Wright, do you recognize this
19 document?

20 A Yes.

21 Q What is it?

22 A This is a city report. Shows joint
23 city report of all the House, Senate,
24 Congressional districts by city. This was
25 effective the 2017 session.

1 Q So if I wanted to see for every
2 city in Georgia what House, Senate, and
3 Congressional districts they would be in, I
4 could look at this document?

5 A Yes.

6 Q And this is a document that's
7 prepared by your office?

8 A Yes.

9 (Whereupon a document was identified
10 as Plaintiff's Exhibit 42.)

11 Q All right. Ms. Wright, next
12 exhibit -- here we go. Can you go to GA 95
13 through 97? Do you recognize this email
14 exchange?

15 A Yes.

16 Q What is it?

17 A This is an email between myself and
18 Linda Meggers related to the shape file for
19 the new House districts so they could use
20 that. She works with some of the local
21 counties now, and she -- and Henry is one of
22 the counties she works with. So they wanted
23 to obtain the shape files so they could begin
24 working on the voter -- changes to the voter
25 lists.

1 Q And did the governor sign the bill
2 on May 13th -- or strike that.

3 Yes. Did the governor sign the
4 bill on May 13th?

5 A I do not recall exactly what day he
6 signed the bill.

7 Q Okay. In looking at this document,
8 does that refresh your recollection?

9 A Okay. Yes.

10 Q Do you recall that he signed it on
11 May 13th?

12 A I recall that I wrote it in this
13 email that he signed it.

14 Q Okay. And given that that was
15 contemporaneous, do you feel pretty confident
16 that that was the day that he actually signed
17 it?

18 A Hopefully, if I put it in an email.
19 (Whereupon a document was identified as
20 Plaintiff's Exhibit 43.)

21 Q Okay. All right. I want to mark
22 as Exhibit 43 a document entitled Georgia
23 Districts 2015.

24 Ms. Wright, do you recognize this
25 document?

1 A Yes.

2 Q What is it?

3 A This is the current House district
4 map packet.

5 Q Well, if I wanted to see the basic
6 district boundaries and basic demographics of
7 this district -- of this plan, I could look at
8 Exhibit 43?

9 A Yes.

10 MR. STRICKLAND: Wait a minute. Is
11 that 40?

12 MR. GREENBAUM: I think it's 43.

13 MR. POWERS: 43.

14 MR. STRICKLAND: What was 42?

15 MR. GREENBAUM: 42 was GA 95
16 through 97.

17 MR. STRICKLAND: I must have gotten
18 one off. I'll take your word for it.

19 MR. GREENBAUM: It's hard to keep
20 track.

21 MR. STRICKLAND: Yeah. I must have
22 gotten off one.

23 (Whereupon a document was identified as
24 Plaintiff's Exhibit 44.)

25 Q I want to mark as Exhibit 44 GA 34

1 to 39. Ms. Wright, do you recognize this
2 document?

3 A Yes.

4 Q What is it?

5 A It's an email Dan O'Connor sent to
6 Representative Knight.

7 Q Okay. And do you know why
8 Mr. O'Connor was emailing Representative
9 Knight?

10 A I believe Representative Knight had
11 some questions about what the district, his
12 new district, was going to be like with the
13 new, the demographics and whatnot related.

14 Q And is it your understanding he was
15 interested not only in his district but the
16 adjoining ones?

17 A I assume so based on the content.

18 Q And do you know why the, at the
19 beginning, first set of data that Mr. O'Connor
20 includes is the Percent Black New Map --

21 A I do not --

22 Q -- in that?

23 A -- know that, no.

24 Q Okay. Now, in the next paragraph,
25 Mr. O'Connor talks about those figures being

1 based on the 2010 census data and doubtless
2 the percentage of the black population would
3 be higher five years later with the rapid
4 minority growth in Henry County. Do you agree
5 with that statement?

6 A Let me back up and read that just a
7 second.

8 I would say there is probably
9 increases in those percentages, yes, based on
10 the growth that we've discussed previously.

11 Q And according to Mr. O'Connor,
12 between April 1, 2010, and July of 2015 in
13 Henry, more than 7,000 blacks were added to
14 the voter roles while white registration
15 declined by more than 3,000 voters. Is that
16 consistent with your understanding of the
17 data?

18 A I have not analyzed that data, so
19 that's his own statement.

20 Q And is this the sort of thing that
21 Mr. O'Connor does as part of his work for the
22 office is to analyze the demographics and the
23 registration data?

24 A He does analyze some of the voter
25 registration data and things along that line,

1 but he often analyzes things of his own
2 interest as well, so I don't know that -- he
3 was not given an assignment to do that.

4 Q Okay. Now, toward the bottom of
5 the first page, he says, "There are few
6 Democrats today serving the Georgia House from
7 districts that are less than 40 percent black.
8 In fact, only three Democrats represent House
9 districts that are less than 20 percent
10 black."

11 Do you agree, disagree, or have no
12 opinion of that statement?

13 A I would trust that he was accurate
14 when he said that. However, I do know that
15 that has changed since then, since Taylor
16 Bennett is no longer in that house, and that
17 has seat went to a Republican.

18 Q And what are the demographics of
19 Taylor Bennett's seat?

20 A I do not know.

21 Q Is it -- oh, you mean in terms of
22 those -- that --

23 A Those three incumbents.

24 Q Right. Okay. So as far as you
25 know, there may only be two Democrats that

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

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.

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

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

1 works for me, I hope he's accurate. But
2 without having looked at it myself, I'm not
3 going to say, not that they don't ever make
4 mistakes.

5 Q So he then says he suspects a lot
6 of Clayton residents have moved to Henry
7 County between 2004 and 2014. Do you agree,
8 disagree, or have no opinion of that
9 statement?

10 A That's his opinion. I'm not -- I
11 don't feel like I'm in a position to say what
12 that is without looking at that deeper.

13 Q And how would you describe his --
14 what his role is as the data analyst within,
15 within your office?

16 A Dan is unique in his ability to
17 retain information. He is a data junkie. He
18 likes numbers. He likes history. He likes
19 geography. He likes all of these types of
20 things and how election results, he can quote
21 back results of elections, I mean,
22 presidential races, from before I was born.
23 And this is just Dan and who he is. He's a
24 unique individual.

25 His role, I mean, he fills a lot of

1 roles on the staff. He does a lot of map
2 requests and information requests from members
3 and anyone else, basically just printing off
4 maps as well as compiling data and
5 information.

6 I didn't know about these requests
7 for information nor had I seen them until you
8 asked for the emails and the subpoena, so I
9 did not know that this information was what he
10 was giving out. He didn't discuss it with me.

11 But Dan does a lot of, of study of
12 those numbers and all election returns and
13 results and things like that of that nature.
14 And a lot of the members like to pick his
15 brain about things like that because he is
16 that, that unique in his ability.

17 Q Okay. Thank you. I want to move
18 on and look at some of the changes to the
19 plans in 105 and 111 in 2015. And why don't
20 we start, why don't we start with 105, so
21 maybe we can try to break out the big maps and
22 take a look.

23 A You want the '12 or just the '15?
24 (Whereupon a document was identified
25 as Plaintiff's Exhibit 46.)

1 Q We're going to look at them both
2 together so that we can understand the
3 interrelationships between the two of them.
4 And then I'm also going to mark, this is 46.
5 This is a data analysis that we had done
6 regarding the precinct demographics for 2015.

7 MR. WILL: This is a document
8 compiled by y'all?

9 MR. GREENBAUM: Yes.

10 Q So one of the things that I'd like
11 to try to break down at a precinct level is
12 what sort of changes were made in District 105
13 between 2012 and 2015.

14 So let's start with precincts that
15 were either reduced or taken away in
16 District 105 in 2015. Could you, could you
17 explain what districts either were removed
18 from the district or reduced in 2015?

19 A 105, Lawrenceville M precinct was
20 split, so I was able to put that precinct back
21 together and make it whole into 104. And
22 that's all.

23 Q So Lawrenceville, there was a
24 portion of the precinct in 2012 that was part
25 of 105?

1 A Right.

2 Q And the whole precinct was moved
3 into 104 in 2015; is that correct?

4 A Yes. You're looking at this area
5 here, blue, gray, that's all one precinct.

6 Q Okay.

7 A Gray added to blue. Put the
8 precinct back together.

9 Q And did you look at all of either
10 partisan performance or racial demographics
11 that, that would be caused by moving a portion
12 of Lawrenceville precinct M?

13 A Well, I'm not sure I went at it
14 that way. I think I went more in the
15 direction of to add first and try to increase
16 that percent total Republican number I told
17 you about the average number --

18 Q Okay.

19 A -- as well as some of the races.
20 So in looking to do that first, that was
21 where, you know, working from there and then
22 moving in the opposite direction to try and
23 bring down the population, and to put a
24 precinct back together would be an easy way to
25 do that as well as keeping that precinct --

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.

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

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

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

1 black percentage than the rest of the plan?

2 A I'm not sure --

3 Q Okay.

4 A -- I'm following that.

5 Q So, you know, according to our
6 data, the portion of Harbins A that you moved
7 into District 105 is less than 15 percent
8 black voting age population.

9 A Okay. That's your -- what you're
10 saying, I mean --

11 Q What I'm saying is that we agree
12 that, we agree that 105 in terms of black
13 voting age population is roughly about 35
14 percent black; correct?

15 A Totally -- I'm sorry. My brain
16 kind of went out on that. Say it again?

17 Q That's fine. With respect to
18 Harbins -- okay. Strike that.

19 With respect to the plan as a whole
20 in 105, is it your understanding that that
21 district is roughly within a few percentage
22 points 35 percent black voting age population?

23 A At what point? Before or after --

24 Q Both.

25 A -- making changes? I think it was

1 less than that or --

2 Q I think it went from 34 to 31. We
3 can --

4 A Something in that range.

5 Q We can go back and look at --

6 A Right.

7 Q -- look at O'Connor's email because
8 it actually has that data in it.

9 A To clarify, my objective was to see
10 if I could find political improvement in the
11 Republican number for her district. So I'm
12 going about this in a way of knowing that,
13 let's see if we -- the Republican area here,
14 try and see if that boosts the district.

15 If that boosted the district,
16 what my next objective would be is to find a
17 way to balance that population out, how would
18 I get that -- to improve and take this area in
19 to boost her political number, what would I
20 then take out?

21 And, obviously, the places where I
22 had split precincts would be my first choice
23 to go because I don't want to split an
24 additional precinct. So that made it the
25 obvious choice to look at the two precincts

1 that she has that were still split.

2 That was why I could easily put
3 Lawrenceville M back together, make sure, you
4 know, that's an entire precinct given back to
5 them, no ballot combination there.

6 And then I actually added some in
7 in Lawrenceville D to her district to then
8 complete a balancing of population. And it
9 was at that point that I would then go back
10 and see, if I did these changes, what impact
11 did that then have on the overall percent
12 total black, Hispanic, and whatnot.

13 So I wasn't doing it block by block
14 to go along and say, oh, well, there's this
15 much here and, oh, there's that much there.
16 That was not the way that I did this. That's
17 not the way I would ever do it.

18 I'm looking at what was my overall
19 objective? Can I achieve that? Then can I
20 balance it? And then what is the numerical
21 result of that after that is done?

22 Q Okay. Now, District 105 pre-2015,
23 we went over the number of precincts that were
24 split. Am I correct that what happened in
25 2015 was you created a split precinct that

1 didn't exist before?

2 A Correct.

3 Q And you reduced a precinct split by
4 taking part of one of the Lawrenceville
5 districts that had been split and putting all
6 of that into 104?

7 A I think what you're saying is I
8 split one and put one back together and
9 changed the split on another one, and that
10 would be right.

11 Q Yes. So that if, if somebody asks
12 you how many precincts were split in 105 in
13 2012 and how many precincts that were split in
14 105 in 2015, it would be the same number?

15 A Yes.

16 Q Thanks. All right. Let's, let's
17 move on to the Henry County plan.

18 Go off the record for a moment.

19 THE VIDEOGRAPHER: Going off record
20 at 3:44 p.m.

21 (Proceedings in recess, 3:44 p.m. to
22 3:55 p.m.)

23 THE VIDEOGRAPHER: We are now back
24 on video record at 3:55 p.m. This is the
25 beginning of file number five.

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?

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

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.

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

1 dividing line through there, so that was why
2 that portion of Hickory Flat was also included
3 with Flippen to offset some of the population
4 figures here as we balance that out.

5 I don't particularly recall the
6 political demographics of this area, but if I
7 was to wager a guess, I'd say that it's
8 probably kind of close in terms of the
9 political breakdown. I don't know that right
10 now off the top of my head. You'd have to
11 look at your --

12 Q Okay.

13 A -- all your stuff.

14 Q Okay.

15 A As I'm doing that, I'm looking at
16 it as I go.

17 Q So can we talk about, can we talk
18 about that a little bit more for a second?

19 A Sure.

20 Q So just to be clear in terms of
21 that part of the county, you removed
22 Stagecoach and Stockbridge West from the plan;
23 correct?

24 A Yes.

25 Q And then you added Flippen or a

1 portion of Flippen?

2 A Portions of Flippen, uh-huh
3 (affirmative).

4 Q And a portion of Hickory Flat;
5 correct?

6 A That's correct. 109 actually
7 had -- in order for it to be contiguous for
8 109 to take those precincts, obviously, all of
9 Flippen could not move. If it moved, it would
10 make it noncontiguous, so I couldn't do that.

11 But this is the railroad, and this
12 is over to Highway 42, which are significant
13 lines and recognizable lines to define those
14 boundaries. But that would enable 109 to be
15 able to take those areas, which would
16 politically help 111.

17 Q Did you realize in doing this that
18 the portion of Hickory Flat that you put into
19 111 has a much lower minority population
20 percentage than the district -- the portion of
21 it that remained in 109?

22 A I did not, but I wouldn't have
23 looked at that because I couldn't take any
24 other portions of Hickory Flat and the
25 districts still be contiguous.

1 Q Okay.

2 A So then as also through here, he
3 had portions of McDonough Central previously.
4 If I recall, I believe Representative Rutledge
5 was interested -- I think he had part of
6 McDonough Central before -- no, actually he
7 did not. That was Representative Welch's.

8 But he was interested in
9 representing a portion of that precinct, so he
10 picked up that precinct. And by keeping this
11 portion with Representative Strickland, it's
12 still contiguous to the McDonough precinct,
13 which he picked up in its entirety and moved
14 in to 111. That was from Representative
15 Welch's district previously, the McDonough
16 precinct was, as a whole.

17 Q Okay.

18 A And then let's see. The changes
19 around Hampton and Mt. Carmel were population
20 related, I think, to balance out the numbers
21 that we were picking up once we moved into the
22 McDonough area.

23 Obviously, if you're picking up,
24 you've got to take out, so you're going to
25 look for where can you take precincts out that

1 were either not as beneficial to his T-rep
2 number or that would be -- and also be enough
3 population to help balance that out.

4 So by looking around the edges of
5 what, what's there, these precincts, if I
6 recall, Unity Grove he had before. Unity
7 Grove was a good precinct for him politically,
8 so it wasn't beneficial to take that away from
9 him. Adding in a little bit of the Tussahaw
10 precinct, which also performs pretty strongly
11 Republican, was beneficial to his T-rep
12 number.

13 And then looking for a place to
14 take away from, to balance that out and
15 actually, you know, get the numbers in line,
16 that was why we put this precinct back
17 together in North Hampton because, again, if I
18 can put one back, I try to put one back and
19 not leave a split.

20 Of course, then that still wasn't
21 enough population to balance it, so I could
22 either have cut in Oakland or cut in
23 Mt. Carmel, and the boundary lines here,
24 there's a large neighborhood and a large -- a
25 good road here that's a recognizable road, so

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

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

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.

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.

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.

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.

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

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

1 technical concern.

2 Q Well, what do you define as a
3 technical concern?

4 A Well, I would offer that I don't
5 believe this is the entire, comprehensive list
6 of reasons why you might make a district
7 change. But I would define a technical
8 concern as maybe you've got a, a potential
9 voter anonymity issue because of the way that
10 a precinct was split, or you find a mistake in
11 terms of trying to align to a precinct line or
12 a city line or something that your objective
13 was that was causing a problem for the county
14 elections office in terms of their work.
15 Those would be what I would define as a
16 technical concern.

17 A noncontiguous piece is usually
18 covered in the language, but it might be
19 something you would want to correct just for
20 the sake of the block assignment report. So
21 those are the kind of things that I would
22 think of as a technical concern.

23 Q And that doesn't really apply -- I
24 understand that there might have been a couple
25 of areas where you made precincts whole that

1 were small pieces of 111, but technical
2 concerns didn't drive the changes to 111 --

3 A No.

4 Q -- did they?

5 A No.

6 (Whereupon a document was identified
7 as Plaintiff's Exhibit 48.)

8 Q Okay. All right. Back to the GA
9 documents. And I want to go to GA-6 through 8
10 and mark that as Exhibit 48.

11 Ms. Wright, when were you first
12 aware that there was consideration of
13 redistricting again in the 2017 legislative
14 session?

15 A I'm not sure when the specific date
16 would have been.

17 Q Do you recognize Exhibit 48?

18 A I've seen it.

19 Q Okay. And this -- there are two --
20 it consists of two emails from the morning of
21 December 14th, 2006 [sic]; correct?

22 A Yes.

23 Q And who is Caulder Harvill-Childs,

24 A He is a staff person who works for
25 the majority leader in the house, I believe,

1 or it may be the caucus chairman. One or the
2 other.

3 Q Okay. And Mr. Harvill-Childs in
4 his email, which is the, on the next page,
5 second page, in the first paragraph, he
6 mentions a Gerald. Do you know who Gerald is?

7 A I don't know.

8 Q Okay. And in the second paragraph,
9 he mentions Spiro.

10 A Spiro.

11 Q Spiro. I'll eventually get that
12 right. And Spiro is -- can you remind me who
13 Spiro is?

14 A He's the chief of staff to the
15 speaker.

16 Q Okay. So he says that Spiro has
17 deputized him to oversee a project for the
18 2017 session and that he'd like for him and
19 Mr. Harvill-Childs and Mr. O'Connor to meet to
20 talk about redistricting in 2017; correct?

21 A It's on the email.

22 Q Okay. Were you aware of this at
23 the time?

24 A No, I was not.

25 Q And the email also references

1 making recommendations for Cobb, Gwinnett,
2 Henry County, referencing Representative
3 Strickland's district, and one other district
4 I can't pronounce that name. Chokis?

5 A Chokis.

6 Q Chokis. Generally the
7 battlegrounds we always deal with.

8 Were you aware that Mr. O'Connor
9 had been tasked to make recommendations for
10 these areas?

11 A He was not tasked by me, so, no, I
12 was not aware of that.

13 (Whereupon a document was identified as
14 Plaintiff's Exhibit 49.)

15 Q Okay. All right. I want to move
16 on to 20 -- what will be the next document,
17 49, and that is GA 9 through 13.

18 Okay. And this is part of the same
19 email trail that we were talking about, but if
20 you look at, I think, the top of page three,
21 we get some -- we get Mr. O'Connor's initial
22 response; is that correct? It starts with,
23 "Hi, Caulder, I'm in all next week except
24 Friday the 23rd."

25 A Okay. That appears to be his

1 response.

2 Q Okay. Do you -- so the first sort
3 of dash discusses meeting with Representative
4 Golick. Who is Representative Golick?

5 A A member of the House.

6 Q In what district?

7 A I'm not a hundred percent sure of
8 his district number. I might say 40, but I'm
9 not sure if that's accurate.

10 Q Now, in the second bullet point
11 referring to Representative Strickland, and in
12 that he says he's not sure there's much more
13 that we can do without saying -- without, say,
14 endangering Representatives Rutledge and
15 Welch. Representative Rutledge won reelection
16 with 58 percent this time, but if you take
17 from him to give to Brian, you could risk
18 losing both seats.

19 Do you agree, disagree, or have no
20 opinion in terms of that statement?

21 A Again, this is his analysis, but
22 having known a little bit about that, those
23 numbers, I would say that's probably a fair
24 statement.

25 Q Okay. And then in the next

1 paragraph he talks about Gwinnett being a
2 tough call county because there were a number
3 of marginal house seats and that the most
4 heavily part of Gwinnett is to the far end of
5 the county like 85 past the Mall of Georgia.

6 Where's the Mall of Georgia?

7 A I'm not sure.

8 Q Okay. And he mentions the fact
9 that Clinton won the seats of four Republican
10 state reps, and they're all close together.
11 Do you know whether that's true?

12 A We looked at this data a fairly
13 good bit, political data in the presidential
14 race. And I'm not a hundred percent certain,
15 but I would lean to think that this is
16 correct.

17 Q That, that trying to make any
18 changes to Gwinnett might actually have a
19 negative ramification for Republicans?

20 A No. I was agreeing with what you
21 said, that Clinton won those seats.

22 Q Oh, okay. Do you agree with his
23 point that, if you try to make more seats safe
24 that -- for Republicans, you might end up
25 losing seats?

1 A I'm sure that's a possibility.

2 Q All right. And then there's a
3 response from Mr. Harvill-Childs at the bottom
4 of the second page.

5 And you see his -- you see his
6 response that "with Gwinnett," he wants to
7 know, "what are our best chances at creating
8 safer seats long-term even if one or two are
9 sacrificed." Do you see that?

10 A I do see that.

11 Q And do you see -- has there been
12 any effort to actually do that in Gwinnett?

13 A By effort, what do you mean?

14 Q Effort to create some additional
15 safe seats by potentially sacrificing other
16 seats?

17 A I don't recall for the 2017, the
18 bill, if it's what you're referencing that was
19 done, there was no districts in Gwinnett that
20 were included on that, so if that's how you
21 would define effort, then there wasn't any
22 effort.

23 Q Okay. And then I'm going to the
24 next part of the email chain further up on
25 page two with Mr. O'Connor's response. He

1 types a lot faster than I did. He got a lot
2 out there in four minutes, to both think and
3 type.

4 A As I said, Dan's very unique.

5 Q And he mentions that someone
6 mentioned to him that he might run for
7 Jeffares' seat when he retires?

8 A That's Senator Jeffares.

9 Q Jeffares. So I guess he was going
10 so fast that, did he misspell?

11 A No.

12 Q Is that how it's spelled?

13 A That how it's spelled.

14 Q Okay. Senator Jeffares. Do you
15 know one way or another in fact whether
16 Representative Strickland intends to run for
17 Senator Jeffares' seat?

18 A Yes, he does. He's already made
19 that public.

20 Q Okay.

21 A Because Senator Jeffares is running
22 for lieutenant governor, so that seat will be
23 an open seat.

24 Q Okay. Now, the last sentence says
25 that -- O'Connor says he hasn't calculated the

1 Trump/Clinton numbers yet but will do so, and
2 then he says in parens, his district is hard
3 to calculate for president because there are
4 so many split precincts in the district.

5 Henry has a large -- lot of large precincts.

6 And that's consistent with what we
7 saw earlier, that there are five split
8 precincts in the district?

9 A Right. And as we discussed with
10 the political data, the political data is only
11 completely accurate to the whole precinct
12 level, so in terms of trying to calculate
13 political data, it's going to be an estimate
14 once you go into those split precincts.

15 Q Now, the -- further up in the
16 chain, I'm now on the first page, it's
17 O'Connor's January 5th, 2017, email, and it
18 says, in the middle of the email, there's a
19 sentence that says, "Traditionally, when we
20 have done midterm redistricting, it has been
21 consensual. Member A wants to give a precinct
22 to Member B, and if member B agrees, the whole
23 House votes for it. But that has been more by
24 committee rule, certainly not by statute."

25 Is this consistent with your

1 understanding of the history in Georgia?

2 A Yes. That midterm redistricting
3 has been consensual? Is that what you're
4 asking?

5 Q Yes.

6 A Yes.

7 Q Now, in two thousand -- what do you
8 mean by consensual?

9 A When a member wants to make a
10 change to their district, the other person who
11 it affects also has to agree to it. That's
12 what that means. Or all of the members
13 affected have to agree to it, or there's no
14 changes made.

15 Q It doesn't mean consensual of the
16 body as a whole, just as to those members?

17 A Just the affected members of the
18 district, that's correct.

19 (Whereupon a document was identified as
20 Plaintiff's Exhibit 50.)

21 Q Okay. Thank you.

22 All right. And then I want to move
23 on to GA 77 and 78, and we'll mark that as
24 Exhibit 50.

25 Ms. Wright, do you recognize this

1 email that's in Exhibit 50?

2 A I have seen it before.

3 Q Okay. Do you recall Mr. O'Connor
4 sending this email to you and you receiving
5 it?

6 A Yes, I do, sort of. I mean, it's
7 in the middle of session, but yes.

8 Q Okay. Do you recall why
9 Mr. O'Connor was specifically emailing you
10 about Districts 105 and 111?

11 A I recall that I asked him something
12 about one or the other districts or both, I
13 don't remember what, and this was his
14 response. But I don't remember what that
15 question initially was.

16 Q Do you have any idea why you were
17 curious about Districts 105 and 111?

18 A I don't know. Could have been
19 something someone asked me. I don't know.

20 Q Okay. And then toward the bottom,
21 under Other General Comments, with respect to
22 Gwinnett, it says, "Comparison of total
23 turnout, black, white, et cetera, from SOS
24 Credit For Voting reports."

25 Do you know why he's talking about

1 that?

2 A I, I don't know why he's talking
3 about that.

4 Q Okay. And it shows that between
5 2012 and 2016 the percentage of voters that
6 were white in Gwinnett went down from 58.2
7 percent to 52.3 percent. Were you aware of
8 that?

9 A I see it on this document, so at
10 the time I read this, I would have been.

11 Q Okay. And then moving on to the
12 next page, do you see that it compares turnout
13 in Henry County and that Henry County went
14 from 52.2 percent white in 2012 to 47.9
15 percent white in 2016?

16 A Yes, I see that here.

17 Q Okay. Was there any consideration
18 at this time in terms of making changes to
19 Districts 105 and/or District 111?

20 A I think from the previous email
21 that you referenced, you saw that there was
22 consideration of making anything they could do
23 in Gwinnett, if there was a possibility of
24 doing anything there, which would have
25 included 105 as that's part of Gwinnett

1 County.

2 111, I think they had looked at, as
3 he mentioned in the previous email, as well.
4 Was there any changes that could be made to
5 politically help Strickland any further, so
6 there was that consideration there as well.

7 (Whereupon a document was identified
8 as Plaintiff's Exhibit 51.)

9 Q Okay. I want to then mark as the
10 next document Exhibit 51, and it's GA 14
11 through 25.

12 All right. And it's an email from
13 Mr. O'Connor to Mr. Efstration; correct?

14 A Uh-huh, yes.

15 Q And I think we talked about earlier
16 that Representative Efstration represents
17 District 104?

18 A Yes.

19 Q And in the second paragraph, it
20 talks about the "Gwinnett delegation is
21 meeting Thursday afternoon and discuss with
22 Brett Harrell some possible changes, taking a
23 look at Gwinnett." Who's Brett Harrell?

24 A He's a rep from Gwinnett County.

25 Q A Republican rep?

1 A Yes.

2 Q And this mentions a meeting of the
3 Gwinnett delegation. Are you aware as to
4 whether that meeting were all the reps from
5 Gwinnett or just the Republicans reps from
6 Gwinnett?

7 A I don't think it was all of the
8 reps. I think it -- I don't even think it was
9 all of the Republican reps. I think it was a
10 portion of the Republican delegation.

11 Q Now, in the middle of the
12 paragraph, it's referring to David Cassis, I
13 believe?

14 A Yes.

15 Q And it says, "David also asked me
16 other day if we could take this up in 2019, by
17 which time presumably the Gwinnett lawsuits
18 would be settled one way or the other, and of
19 course we could do so in 2019."

20 What's he referring to in terms of
21 the Gwinnett lawsuits.

22 A I assume he means the pending case
23 related to the School Board and County
24 Commission. I do not know why that would be
25 relevant to them taking up the maps though.

1 Q Okay. And then the next paragraph
2 references Chairman Caldwell. Who is Chairman
3 Caldwell?

4 A He's the chairman of the House
5 Reapportionment Committee now.

6 Q And it talks about getting moving
7 by next week in terms of legislation. And now
8 we're in February of 2017. Are you at this
9 point working on a reapportionment plan for
10 2017?

11 A I don't recall dates on when things
12 were worked on related to stuff that happened
13 during this time.

14 (Whereupon a document was identified as
15 Plaintiff's Exhibit 52.)

16 Q Okay. Then I want to move to
17 Exhibit 52, and that is going to be GA 28 and
18 29. And, Ms. Wright, who is Jan Jones?

19 A She is a representative in the
20 House and also the speaker pro tem.

21 Q And what role did she have with
22 respect to the proposed redistricting in 2017?

23 A She had an exchange with a member
24 she wanted to make.

25 Q Other than that exchange, anything

1 else?

2 A Not that I'm aware of.

3 Q Do you know why Mr. O'Connor was
4 listing a number of the districts in Gwinnett?

5 A I do not.

6 Q And also listing percentages for
7 other Republican-held districts?

8 A I don't know. As I told you
9 before, Dan loves his data, and he loves to
10 tell it to people. He loves all the data
11 everywhere.

12 Q Okay.

13 A And he likes to share it, so.

14 (Whereupon a document was identified
15 as Plaintiff's Exhibit 53.)

16 Q All right. All right. So next
17 want to go to GA 92 to 94, and we'll call that
18 53.

19 MR. STRICKLAND: Can you say those
20 GA numbers again?

21 MR. GREENBAUM: 92 and 93 and 94.
22 92 to 94.

23 MR. STRICKLAND: Got it.

24 Q So what is Exhibit 53?

25 A This is an email.

1 Q From Mr. O'Connor to yourself?

2 A Yes.

3 Q And it's dated March 16th?

4 A Right.

5 Q Now, this references a -- the
6 second and third page are draft minutes of a
7 meeting of the Reapportionment Committee on
8 March 1st, 2017, and it talks about
9 considering HB 515; correct?

10 A Yes.

11 Q So prior -- at some point prior to
12 March 1st, you would have created a proposed
13 redistricting plan for 2017; correct?

14 A Yes.

15 Q And who, who, who was it that you
16 were coordinating with, with respect to the
17 2017 plan?

18 A As far as putting together?

19 Q Yes. Who had, who -- whose
20 information -- who were you seeking input from
21 in terms of creating that plan?

22 A Well, as we've done before, members
23 who had wanted to submit a change to be
24 considered met with staff in our office or
25 myself and worked on a map, took it to the

1 chairman. Chairman Caldwell made a decision
2 to what's going to go into the map between he
3 and Spiro.

4 Once those decisions were made of
5 what's going to be input into the map, then
6 the map was pieced together.

7 (Whereupon a document was identified as
8 Plaintiff's Exhibit 54.)

9 Q I want to mark as Exhibit 54 a
10 two-page document, and the first page is
11 entitled Proposed Georgia House Districts, and
12 it's dated 2017.

13 MR. STRICKLAND: I missed that
14 number. Sorry.

15 MR. GREENBAUM: No numbers.

16 MR. STRICKLAND: No numbers.

17 Q Ms. Wright, do you recognize this
18 document?

19 A I do, but this is not a document I
20 would have created. This is not fully drawn
21 and printed.

22 Q Do you know who created it?

23 A I don't because this map would have
24 been shown in its entirety and there would be
25 detail on this.

1 Q Oh, let me give you this --

2 A Yeah, that would be better.

3 Q Oh, no. I don't know what --

4 A That looks a little better.

5 Q I don't know what you got.

6 A I don't either.

7 Q We'll replace the exhibit number.

8 MR. STRICKLAND: So we're not using

9 this?

10 MR. GREENBAUM: No.

11 THE WITNESS: You got the bad one

12 too?

13 MR. GREENBAUM: Wait. That one's

14 bad too?

15 THE WITNESS: His is.

16 MR. GREENBAUM: Oh. I don't know

17 what --

18 THE WITNESS: And his is too.

19 MR. GREENBAUM: We had an issue

20 with the coping service. So --

21 THE WITNESS: That's right.

22 Q Okay. So the one in front of you

23 that we're now calling 54 is correct?

24 A Yes.

25 Q And what is Exhibit 54, Ms. Wright?

1 A This is the map that was proposed
2 in 2017 session.

3 Q Okay. And did you create
4 Exhibit 54?

5 A Yes.

6 Q Okay. And Exhibit 54 doesn't
7 include any proposed changes for Gwinnett
8 County; correct?

9 A That's correct.

10 Q It does include proposed changes
11 for District 111 in Henry County; correct?

12 A Yes.

13 Q And that district -- it was going
14 to create a change between District 73 and
15 District 111; correct?

16 A Yes.

17 Q And what was the substance of the
18 change between District 73 and District 111?

19 A In 111, we put a precinct back
20 together and split a different precinct. The
21 representative had had a request from some
22 people in that area that he knew and had grown
23 up around, and they were unhappy that they
24 weren't able to vote for him. He wasn't on
25 their ballot. And so he wanted to see if that

1 would be something we could do.

2 Q And what district did you split,
3 and what district did you put back together?

4 A We put Mt. Carmel back together,
5 and we split a portion of South Hampton.

6 Q And so in the new plan, where did
7 Mt. Carmel end up?

8 A It's in District 73.

9 Q Okay. So Mt. Carmel went to 73,
10 and 111 took on a portion of South Hampton?

11 A Yes.

12 Q Okay. Do you know how that changed
13 the performance of District 111 for a
14 Republican candidate?

15 A If I recall, it was about one
16 percent maybe.

17 Q One percent better or one percent
18 worse?

19 A One percent better for
20 Representative Strickland.

21 Q Okay. And do you recall
22 Representative Strickland having a close
23 election in 2016?

24 A Yes.

25 Q Do you recall Representative

1 Strickland performing worse in -- than he did
2 in 2014 with respect to some of the precincts
3 that were not affected between 2014 and 2016?

4 A Can you say that again?

5 Q Yes. So there were a number of
6 changes in District 111 and to -- in 2015;
7 correct?

8 A Yes, in '15.

9 Q But there were some precincts that
10 were not changed at all in 2015; correct?

11 A Yes.

12 Q Did you look at all as to how
13 Representative Strickland performed in those
14 unchanged precincts in '16 as compared to '14?

15 A I don't recall looking at it
16 precinct by precinct, the data that way.

17 Q Now, Mr. O'Connor had been tasked
18 by the chief of staff for the speaker to work
19 on the redistricting; correct?

20 A At that point in time, yes.

21 Q Was there a certain point in time
22 where things changed?

23 A Yes.

24 Q When did that happen?

25 A When I found out about it.

1 Q Okay.

2 A I don't know when that was exactly
3 though.

4 Q Okay. And when did that happen?

5 A I don't know when that was exactly.

6 Q Sorry. All right. Now, Mr.,
7 Mr. O'Connor, the second and third pages of
8 Exhibit 53 referenced minutes of -- or draft
9 minutes of the meeting of the House
10 Reapportionment Committee on March 1st;
11 correct?

12 A Yes.

13 Q And did you attend that meeting?

14 A Yes.

15 Q Okay. Now, Representative -- the
16 minutes reflect that Representative Scott
17 expressed concern about the changes to
18 Districts 73 and 111 in Henry County. Do you
19 recall Representative Scott expressing
20 concerns?

21 A I honestly do not.

22 Q Okay. Now, he said that he had
23 sent an email to Ms. Miller the day after the
24 March 1 meeting with a draft summary; correct?

25 A Yes.

1 Q Does the fact that he sent the
2 minutes the day after the meeting itself lend
3 credibility to the fact that Representative
4 Scott expressed concern about changes to
5 Districts 73 and 111?

6 A I'm, I'm really not sure what
7 the --

8 Q Yeah.

9 A -- what you're trying to get to.

10 Q What I'm trying to get -- yeah.
11 I'm not trying to -- I'm trying to get at the
12 fact that he, that he sent the notes the day
13 after.

14 A Well, the meeting was held at
15 5:00 p.m., so that would be probably why that
16 happened pretty quick the first thing the next
17 morning.

18 Q The first thing the next morning.
19 So the fact that he did it pretty quickly,
20 does that make it more likely that the minutes
21 are accurate in terms of portraying what
22 happened?

23 A Dan is pretty meticulous with his
24 notes and details, so I would presume that
25 this is an accurate summary.

1 I did not know Dan took notes on
2 minutes on meetings until after I found this
3 out. I think that's a carryover from when he
4 worked for the committee as a research
5 analyst. That's what he used to do, so he's
6 always just continued to do that, but I did
7 not know that he did that, and now I do.

8 Q You did as of March 16th?

9 A Yes.

10 Q All right. Now, after this House
11 meeting, in fact, there was a revised plan
12 that, that was considered by the House;
13 correct, a modified plan?

14 A Can you start over again?

15 Q Sure.

16 A I'm not sure I heard all of it.

17 Q Yes. What I wanted to get at: Was
18 at a certain point in time, the House
19 considered a second plan in 2017; correct?

20 A The House considered a second plan?

21 Q Yes. Or the Senate -- the Assembly
22 considered a second plan; correct?

23 A The House passed this version.
24 When it got to the Senate, I believe there was
25 a sub in the Senate committee that was

1 different from this version, I think. Is that
2 what you're getting at?

3 Q Yes.

4 A Okay.

5 Q That there was a second version.

6 A I think that's how it went down.

7 Q Okay. And in that second version,
8 the changes between 73 and 111 did not appear;
9 correct?

10 A Yes -- I mean, yes. Yes, they did
11 not appear.

12 Q And do you know why that change was
13 taken out?

14 A I think there were, there were
15 those two districts removed as well as the two
16 in this area here between Cobb and Fulton were
17 also removed. There was a lot of comment, and
18 I guess the members decided that it wasn't, it
19 wasn't something they wanted to pursue because
20 of that, so they chose to not make any changes
21 and remove their portions of the districts.

22 Q There was a lot of comment because
23 people were critical of the changes between 73
24 and 111?

25 A Well, I think they were critical of

1 all of them, doing it at all, but, yes, I
2 mean, I think that that was part of it, yeah.
3 Those districts, those districts, you know I
4 think people just didn't want to see anything
5 done at that point anyhow.

6 Q But the House passed it regardless;
7 correct?

8 A Yes, the House had passed it
9 already. And then, like I said, this was in
10 the Senate committee when they sent the bill
11 in the committee there.

12 Q Was there concern expressed with
13 respect to 111 that by making these changes it
14 would be more difficult for an
15 African-American candidate to get elected to
16 that district?

17 A I don't recall that being
18 specifically said, to me anyway.

19 Q Okay. What do you recall being
20 said about the changes between 73 and 111?

21 A Specifically, I don't recall what
22 comments were made about any specific
23 district. I think more, more than anything
24 people just didn't want to see the map being
25 changed again in 2017.

1 (Whereupon a document was identified as
2 Plaintiff's Exhibit 55.)

3 Q Okay. I want to move on to the
4 next exhibit which I think is 55, and that's
5 GA 86 to 90.

6 MR. STRICKLAND: What was 54?

7 MR. GREENBAUM: 54 was --

8 MR. WILL: The map.

9 MR. GREENBAUM: -- this messed up
10 one.

11 MR. STRICKLAND: Okay. Got it.

12 MR. WILL: And page numbers again,
13 tell me.

14 MR. GREENBAUM: 86 to 90.

15 MR. WILL: Thank you.

16 Q Okay. Ms. Wright, do you recognize
17 this document?

18 A Yes.

19 Q What is it?

20 A It's a series of emails that began
21 with Dan and an individual, and then at some
22 point it began -- it was forwarded to me to
23 respond to.

24 Q Okay. And do you know who
25 Ms. Cochard is?

1 A I do not.

2 Q Okay. And this actually gives the
3 history that you were talking about a couple
4 of minutes ago, what was in the initial House
5 bill and then what happened in the Senate;
6 correct?

7 A I think it --

8 Q I'm looking --

9 A I know what Dan's portion --

10 Q -- at the first email on pages --

11 A Okay.

12 Q -- four and five.

13 A Let me go back to that. I don't
14 know what that says.

15 Apparently, the initial email went
16 to Deborah Miller. I didn't know that, or I
17 didn't remember that.

18 Yes, that does appear to describe
19 what I just said about that bill.

20 (Whereupon a document was identified as
21 Plaintiff's Exhibit 56.)

22 Q Okay. All right. And then I'm
23 going to mark as Exhibit 56, GA 40 to 59.

24 (Whereupon off-the-record discussions
25 ensued.)

1 MR. STRICKLAND: Can we go off the
2 record for just a second?

3 MR. GREENBAUM: Sure.

4 THE VIDEOGRAPHER: Going off video
5 record.

6 (Proceedings in recess, 4:51 p.m. to
7 4:59 p.m.)

8 THE VIDEOGRAPHER: We're now back
9 on video record at 4:59 p.m. This is the
10 beginning of file number six.

11 Q All right. Ms. Wright, let's go
12 back to Exhibit 56 for a couple of minutes.
13 It's the document that you got just before we
14 broke.

15 A Okay.

16 Q And what is Exhibit 56?

17 A This is an email of the 2012 map
18 packet, what was adopted in '12, and then a
19 map of the 2015 Henry County portion that was
20 sent to Representative Welch.

21 Q And do you know why Representative
22 Welch wanted this information?

23 A I do not know that.

24 Q Okay. In your office, do you have
25 any standard operating procedures with respect

1 to email and file retention?

2 A As -- no, I guess.

3 Q No?

4 A No.

5 Q Do you have any procedures that you
6 yourself follow in terms of email retention?

7 A I archive emails. I delete junk.
8 And it depends on -- I don't know. I don't
9 archive often enough probably, but I do it by
10 hand, so I don't do it -- I don't let it auto
11 archive, which I probably should, but I don't.

12 Q And so do you delete any emails
13 that contain any substantive information
14 about, for example, plans that you're working
15 on?

16 A No.

17 Q And when you archive them, do you
18 archive them into a particular folder?

19 A I don't know where it goes. I
20 just --

21 Q Okay.

22 A -- just do it.

23 Q You just, it archives as a group
24 of --

25 A Yeah.

1 Q -- emails?

2 A The folder, yeah, set it up in an
3 archive folder that, from what I understand
4 is, saved off of that network somewhere.

5 Q Okay.

6 A I don't know.

7 Q And in coming up with, you and your
8 staff, in terms of responding to the document
9 request, you went through the archives?

10 A Yes.

11 Q Okay. I want to go back -- do you
12 know why Representative Welch wanted the
13 information that is contained in Exhibit 56?

14 MR. STRICKLAND: Asked and
15 answered.

16 MR. WILL: Asked and answered.

17 Q Okay.

18 A Should I answer it again?

19 MR. WILL: Yes.

20 MR. STRICKLAND: Go ahead.

21 A No, I don't know.

22 Q Okay. All right. So I want to now
23 go back to the Henry County 2015 plan, and I
24 want to ask you about District 109.

25 A Uh-huh (affirmative).

1 Q In, in your view, is District 109
2 compact?

3 A For the most part.

4 Q Where, where would you consider it
5 not to be compact?

6 A Well, compact is hard to define,
7 but the majority of the district is here --

8 Q Can you describe --

9 A -- and have this piece --

10 Q -- what "here" is?

11 A The majority of the district
12 stretches from the Hickory Flat and Lake Haven
13 precincts into Newton County and up into the
14 corner of Rockdale County around, kind of
15 centered around the East Lake and Kelleytown
16 areas, and then stretches now further up into
17 some of Stockbridge. But Stockbridge is a
18 very large city, so it has some of Stockbridge
19 in this area. This area down here is also
20 Stockbridge but so is this out here.

21 Q So do you have a sense, from end to
22 end from, let's say, the edge of where
23 Stagecoach is to where Mt. Bethel is, how many
24 miles that is?

25 A I do not.

1 Q Okay. And then with respect to
2 111, would you consider 111 to be compact?

3 A 111 is more compact than it had
4 previously been.

5 Q Do you consider it to be compact
6 now?

7 A It's more compact than it was
8 previously.

9 Q So relatively speaking, it's more
10 compact than it was before, but would you, but
11 would you consider it to be --

12 A Whichever district had these
13 precincts that were here was going to be a
14 little bit less compact than it had been. I
15 think that this district running more this
16 way, that was also a really long district in
17 size.

18 But, you know, this one going that
19 way, east to west versus north to south,
20 either way, they're going to be large
21 districts in size. Henry County is very large
22 geographic county. Precincts are large.

23 Q Would it be fair to say that
24 District 111 runs from the northwest part of
25 the county to the southeast part of the

1 county?

2 A Oh, I wouldn't say that. The
3 northwest part of the county is up there at
4 the very top under the H, so it's not nearly
5 as far north as the county stretches.

6 Q But relative, relatively speaking,
7 it's more north than several of the districts
8 in the county; correct?

9 A You mean 111 is located further
10 north than other districts in the county?

11 Q Yes.

12 A A portion of it stretches further
13 north than some of the other districts, but
14 those districts do not -- are not centered in
15 the same location that that district is.

16 Q Okay. It goes all the way to the
17 western boundary of the county; correct?

18 A Yes.

19 Q That Pates Creeks is in the western
20 boundary?

21 A Yes.

22 Q And it goes all the way to the
23 southeastern portion of the county too;
24 correct?

25 A Yes. It goes to Locust Grove area.

1 Q Okay. So you would say that 111 is
2 more compact in 2015 than it was in 2012, but
3 I didn't get a clear answer as to whether you
4 consider it to be compact in 2015.

5 A I mean, compact, there's not an
6 easy way to define compactness to me. Could
7 it be more compact? Possibly. But when you
8 take into account other factors as you have to
9 consider and that we were considering for the
10 drawing of the district, I would say it's as
11 compact as it can be and also fit with the
12 criteria that were given.

13 Q Okay. And as we mentioned before,
14 it's the only one of the eight legislative
15 districts in Henry County that is entirely in
16 the county; correct?

17 A That is correct.

18 Q That, that the other districts
19 either run to the -- it sort of creates, it
20 sort of creates a diagonal across the county,
21 wouldn't you say?

22 A 111?

23 Q 111.

24 A I don't -- I guess you could say
25 it's a diagonal. This is I-75, so it sort of

1 parallels to the interstate that runs through
2 it.

3 Q And 175 -- and I-75 goes from the
4 northwest corner to basically the southeast
5 corner; correct?

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.

11 Q So the north edge of the county --

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.

18 Q Oh, I see.

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 --

25 Q Okay.

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.

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.

14 Q Is there a reason why part of
15 McDonough is in District 111 but not Westside?

16 A Westside was in 1 -- 110 on the
17 original map in '12 down there.

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 --

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

1 the 111, but it had been in 110 before when it
2 looked like that.

3 Q Okay. So one of -- so Westside in
4 both maps --

5 A Was in 110.

6 Q -- was not --

7 A It was not moved.

8 Q -- was in 110?

9 A That's correct.

10 Q And if Westside had been in 111, it
11 would make 111 less Republican?

12 A Yes, I think so.

13 Q Would it also make 111 less or more
14 black?

15 A Possibly so.

16 Q Let me ask the question again
17 because it's going to come out --

18 A I would have to look.

19 Q -- imprecise in the transcript.
20 Would it also make 111 more black?

21 A Would Westside being in 111 make
22 111 more black?

23 Q Yes.

24 A I'd have to look at the
25 demographics of the Westside precinct. I

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.

4 MR. POWERS: That was it.

5 MR. GREENBAUM: All right. No
6 further questions at this time.

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?

11 MR. WILL: Aria, are you there?

12 MS. BRANCH: Yes, I'm here. I'm
13 sorry. I didn't hear the question.

14 MR. WILL: The question was: Do you
15 have any questions?

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.

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.

25 - - -

1 EXAMINATION

2 BY MS. BRANCH:

3 Q One question I have is whether or
4 not there was any discussion about creating any
5 additional majority-black districts in the 2011
6 map?

7 A When you refer to the 2011 map, you
8 mean the first redraw following the census?

9 Q Correct.

10 A So when we, when we drew that map,
11 we applied the new census data to our existing
12 House districts, and although the number of
13 majority-minority districts at that time was
14 inclusive of districts whose deviations were
15 not balanced, we made every effort to create at
16 least that many majority-minority districts,
17 and we were successfully able to do so.

18 And because you use the same 2010
19 census data to redraw, no, there has not been
20 any further discussion of creating an
21 additional district because we would be using
22 the same data that we used previously.

23 And along that same line, midterm
24 redistricting that we've done, as we discussed,
25 is normally a consensual process between the

1 incumbents, so to create a new open seat would
2 require two incumbents to willingly choose to
3 say, let's draw a new district, and I'll be
4 paired with this other incumbent and give up my
5 seat in order to create an open seat, and that
6 has not happened as far as I'm aware.

7 Q Did the 2011 map have the same
8 number of majority-minority districts as the
9 2000 map, House of Representative districts?

10 A As far as the 2000, you mean the map
11 that was being used in the year 2000?

12 Q Yeah. So the map immediately
13 preceding the 2011 map, did that have, you
14 know, as amended or however, did that have the
15 same number of majority-minority districts as
16 the map that was created in 2011, which was the
17 map immediately preceding the 2010 census?

18 A I would want to go back and
19 double-check that, but if I'm not mistaken, I
20 believe we added about six majority-minority
21 districts following --

22 Q Okay.

23 A -- the new census data.

24 MS. BRANCH: Okay. No further
25 questions for me.

1 MR. GREENBAUM: Frank?

2 MR. STRICKLAND: The other question
3 I had for you, Jon, is I don't know where you
4 stand on how much of your time you've utilized,
5 but are you finished with this witness, or are
6 you reserving the right to ask her some more
7 questions?

8 MR. GREENBAUM: So the thing that,
9 the thing that I'm particularly interested in,
10 and we talked a little bit about this before,
11 David and I, is I'm not sure -- the witness had
12 talked about the fact that she had these
13 folders for -- that they keep folders for each
14 of the legislators, and that she sent the
15 shape -- she sent the information from those
16 folders that would have maps that were
17 considered with respect to their districts,
18 that she put them on a CD.

19 I'm not sure that that information
20 got to us. We got the documents that were one
21 of the things that we asked for. I'm not sure
22 that we got the alternate maps. And if we
23 haven't gotten the alternate maps, then, you
24 know, I would keep the deposition open
25 specifically to discuss those alternate maps.

1 MR. STRICKLAND: To look at maps
2 that weren't adopted?

3 MR. GREENBAUM: Correct.

4 THE WITNESS: Can I speak to that?

5 RE-EXAMINATION

6 BY MR. GREENBAUM:

7 Q Yes.

8 A Everything we had was on those
9 disks. The shape files that were there were
10 all of the alternative proposed shape files
11 that I have.

12 Now, I'm assuming you're aware of
13 the ransomware virus we had that attacked our
14 system. You knew about that?

15 Q Yes.

16 A And so anything that there could
17 have been additional things that we have no
18 record of now that were taken in that virus, if
19 I had it in an email, like if I had a PDF or I
20 had something, I had sent a proposal in an
21 email, I was able to open the email, we could
22 recreate those. Those were recreated, and
23 anything that I had of that nature was included
24 in those shape files.

25 If it was never sent in an email and

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.

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

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.)
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1 I, GINA H. WRIGHT, Deponent,
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CERTIFICATE OF COURT REPORTER

STATE OF GEORGIA

COUNTY OF COBB

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

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

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

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

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

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19 This 5th day of December 2017.

20

21



JOEL P. MOYER, CCR 2745
Certified Court Reporter

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