

Exhibit 20

Excerpts From Stephen Ansolabehere's *Harris* Testimony

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IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF NORTH CAROLINA

DAVID HARRIS, CHRISTINE)	
BOWSER, and SAMUEL LOVE,)	Greensboro, North Carolina
)	October 14, 2015
Plaintiff,)	9:06 a.m.
)	
vs.)	
)	
PATRICK MCCRORY, in his)	
capacity as Governor of North)	Case No. 1:13CV949
Carolina, NORTH CAROLINA STATE)	
BOARD OF ELECTIONS, and JOSHUA)	
HOWARD, in his capacity as)	
Chairman of the North Carolina)	
State Board of Elections,)	
)	
Defendants.)	

TRANSCRIPT OF BENCH TRIAL VOLUME II OF III HELD BEFORE
THE HON. WILLIAM L. OSTEEN, JR., UNITED STATES DISTRICT JUDGE
THE HON. MAX O. COGBURN, JR., UNITED STATES DISTRICT JUDGE
THE HON. ROGER L. GREGORY, UNITED STATES DISTRICT JUDGE

APPEARANCES:

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1 A I know of no legal case. I'm just testifying as an
2 expert. I don't know the law on this.

3 Q Okay. And have you stated in this case, in *Bethune-Hill*,
4 that if the Reock score is above .2, then that would not be
5 considered a non-compact district?

6 A Yeah, .2 -- .19 remember is the Reock of the original
7 gerrymander in the State Senate side and .29 -- or 28 is the
8 original gerrymander in the congressional district. So .2 is
9 one of the thresholds that we commonly use. .25 again is
10 Pildes as well as .15 Pildes and Niemi. So different
11 thresholds in that neighborhood are used, so we really look for
12 that neighborhood. There's no firm statistical test for what's
13 non-compact or compact. .2 is one of the rules of thumb.

14 Q So wait a second. I'm confused. What are the two
15 districts you're talking about where you get this .19 and .28?

16 A The original gerrymander as it was drawn, the thing that
17 we call the gerrymander, it's named after Elbridge Gerry --
18 Gerry, had a Reock score of .19.

19 Q What kind of district is that?

20 A One of them is a State Senate district, and one of them is
21 US congressional district. The State Senate district had a .19
22 and the congressional had a .28.

23 Q And how do you know that?

24 A I calculated it.

25 Q Okay.

1 A I have Jeff Lewis, who's a scholar at UCLA, has provided
2 all of the mapping data for every congressional district in US
3 history, and I calculated the compactness of every
4 congressional district in US history, including the original
5 gerrymander.

6 Q Okay. Now, was there any finding that these two districts
7 that you recall were found to be uncompact?

8 A Finding?

9 Q By a Court?

10 MR. HAMILTON: Objection, Your Honor. Now he's
11 examining him on the law. He's not a lawyer. He's here as a
12 statistical expert.

13 JUDGE OSTEEEN: He's asking for -- he may or may not
14 know, but he's asking a question about his knowledge. I'll
15 overrule. You can answer the -- if you -- I mean, you can
16 answer the question.

17 THE WITNESS: I don't know.

18 BY MR. FARR:

19 Q Okay. You don't -- has there ever been a finding by a
20 Court that either .28 or .19 are insufficiently compact?

21 A Not to my knowledge. As an analyst I use it more as a red
22 flag than as something I throw at a district because it's too
23 low.

24 Q All right. And, Doctor, do you know -- I asked you this
25 at your deposition, I think, but did you go back and look to