

EXHIBIT 24



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Transcript of Charles W. Eyler, Jr.

Date: January 31, 2017

Case: Benisek, et al. -v- Lamone, et al.

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Conducted on January 31, 2017

<p style="text-align: center;">1</p> <p>1 IN THE UNITED STATES DISTRICT COURT</p> <p>2 FOR THE DISTRICT OF MARYLAND</p> <p>3 ----- x</p> <p>4 O. JOHN BENISEK, et : 5 al., : 6 Plaintiffs, : Case No. 7 v. : 13-CV-3233 8 LINDA H. LAMONE, et : 9 al., : 10 Defendants. : 11 ----- x</p> <p>12</p> <p>13 Deposition of CHARLES W. EYLER, JR. 14 Baltimore, Maryland 15 Tuesday, January 31, 2017 16 1:26 p.m.</p> <p>17</p> <p>18</p> <p>19</p> <p>20 Job No.: 133654 21 Pages: 1 - 35 22 Reported By: Sandra A. Slater, RPR, CSR</p>	<p style="text-align: center;">3</p> <p>1 A P P E A R A N C E S</p> <p>2 ON BEHALF OF PLAINTIFFS:</p> <p>3 STEPHEN M. MEDLOCK, ESQUIRE 4 MICAH D. STEIN, ESQUIRE 5 MAYER BROWN, LLP 6 1999 K Street, N.W. 7 Washington, DC 20006-1101 8 (202) 263-3221 9</p> <p>10 ON BEHALF OF DEFENDANTS:</p> <p>11 JENNIFER L. KATZ, ESQUIRE 12 OFFICE OF THE ATTORNEY GENERAL 13 200 Saint Paul Place 14 20th Floor 15 Baltimore, Maryland 21202 16 (410) 576-6324 17 18 19 20 21 22</p>
<p style="text-align: center;">2</p> <p>1 Deposition of CHARLES W. EYLER, JR., held at the 2 offices of:</p> <p>3</p> <p>4</p> <p>5 OFFICE OF THE ATTORNEY GENERAL 6 200 Saint Paul Place 7 20th Floor 8 Baltimore, Maryland 21202 9 (410) 576-6324 10 11</p> <p>12</p> <p>13</p> <p>14 Pursuant to notice, before Sandra A. Slater, 15 Notary Public in and for the State of Maryland. 16 17 18 19 20 21 22</p>	<p style="text-align: center;">4</p> <p>1 C O N T E N T S</p> <p>2 EXAMINATION OF CHARLES W. EYLER, JR. PAGE 3 By Ms. Katz 5 4 5</p> <p>6</p> <p>7 E X H I B I T S 8 (Attached to the Transcript.) 9 C. EYLER DEPOSITION EXHIBITS PAGE 10 Exhibit 14 Notice of Deposition 34 11 12 13 14 15 16 17 18 19 20 21 22</p>

5	<p>1 PROCEEDINGS</p> <p>2 Whereupon,</p> <p>3 CHARLES W. EYLER, JR.,</p> <p>4 being first duly sworn or affirmed to testify to the</p> <p>5 truth, the whole truth, and nothing but the truth,</p> <p>6 was examined and testified as follows:</p> <p>7 EXAMINATION BY COUNSEL FOR THE DEFENDANTS</p> <p>8 BY MS. KATZ:</p> <p>9 Q Good morning, Mr. Eyler.</p> <p>10 A Hi.</p> <p>11 Q My name is Jennifer Katz, and I'm an</p> <p>12 Assistant Attorney General with the Attorney</p> <p>13 General's Office, and I represent the defendants in</p> <p>14 this case.</p> <p>15 A Um-hum.</p> <p>16 MS. KATZ: I'm going to have your counsel</p> <p>17 introduce themselves for the record.</p> <p>18 MR. STEIN: Micha Stein from Mayer Brown</p> <p>19 representing the plaintiffs and the witness.</p> <p>20 MR. MEDLOCK: Stephen Medlock from Mayer</p> <p>21 Brown representing the plaintiff and the witness.</p> <p>22 Q Okay. I'm just going to show you -- I think</p>	7	<p>1 Reporter is trying to take down everything that we</p> <p>2 say, I'm going to ask that you wait until I finish a</p> <p>3 question to give an answer, and then I'll wait until</p> <p>4 you're done giving an answer to ask another</p> <p>5 question. In other words, we won't talk over each</p> <p>6 other. And I'm going to ask that you provide verbal</p> <p>7 answers to questions for the benefit of the Court</p> <p>8 Reporter. If you don't understand a question that I</p> <p>9 ask, please ask me to clarify. If you don't tell me</p> <p>10 that you don't understand I'm going to assume that</p> <p>11 you do.</p> <p>12 And we're going to try to make it through</p> <p>13 without a break, I don't think this will take very</p> <p>14 long, but to the extent you need to take a break,</p> <p>15 please let me know and we will find a good place to</p> <p>16 stop.</p> <p>17 So I just want to make sure that you feel</p> <p>18 that you're able to testify today. Are you taking</p> <p>19 any medication that may affect your ability to</p> <p>20 testify or recall matters?</p> <p>21 A I'm taking medication for a disease that I</p> <p>22 have, but it is not anything that affects my mental</p>
6	<p>1 we're doing this in order, and I think we're up to</p> <p>2 number 14.</p> <p>3 MR. MEDLOCK: Yes.</p> <p>4 MS. KATZ: Exhibit 14. Is that correct?</p> <p>5 MR. MEDLOCK: That's right.</p> <p>6 Q I'm just going to show you what's going to</p> <p>7 be marked as Exhibit 14 and give a copy to your</p> <p>8 counsel. Have you seen this document before?</p> <p>9 A Yes.</p> <p>10 Q Okay. And are you the subject of this</p> <p>11 deposition notice?</p> <p>12 A Yes, I am.</p> <p>13 Q Okay, great. Just do you still reside at</p> <p>14 this address that's listed here, 13249 Creagerstown</p> <p>15 Road --</p> <p>16 A I do.</p> <p>17 Q -- in Thurmont? Okay, great. Thank you,</p> <p>18 very much. Mr. Eyler, have you ever been deposed</p> <p>19 before?</p> <p>20 A No.</p> <p>21 Q Okay. So I'm just going to go over a couple</p> <p>22 of brief housekeeping rules. So because the Court</p>	8	<p>1 ability.</p> <p>2 Q Okay, great. Thank you, very much. So we</p> <p>3 just sort of went over your current address in</p> <p>4 Thurmont. How long have you lived there?</p> <p>5 A Since 1976.</p> <p>6 Q Oh.</p> <p>7 A At the same address.</p> <p>8 Q Okay.</p> <p>9 A And before that -- I was born there and</p> <p>10 lived there till I went away to college.</p> <p>11 Q At that same address?</p> <p>12 A No, at a different address. My parents'</p> <p>13 home. But I've lived in Thurmont -- except for</p> <p>14 college and graduate school I've lived there all my</p> <p>15 life.</p> <p>16 Q Where did you attend college?</p> <p>17 A Catawba College and then Penn State.</p> <p>18 Q Where is Catawba College?</p> <p>19 A Salisbury, North Carolina.</p> <p>20 Q Oh, okay. All right. So you started in</p> <p>21 North Carolina and you finished at Penn State?</p> <p>22 A Yes, I did.</p>

9

1 Q And what did you get your degree in?

2 **A Music and theater. And then I just did the**

3 **technical theater at Penn State.**

4 Q Wonderful. And you mentioned graduate

5 school. Where did you attend graduate school?

6 **A That was Penn State.**

7 Q Oh, that was Penn State.

8 **A That was graduate school.**

9 Q Sorry. And are you currently employed?

10 **A No, I retired in 2014.**

11 Q What did you retire from?

12 **A I taught for 16 years in the public school**

13 **system and then I started a business and had that**

14 **for -- well, it overlapped with the teaching, but I**

15 **did that for over 30 years. And then after 2007,**

16 **which affected all of us, it took a long time, but I**

17 **finally retired in 2014.**

18 Q Okay. What kind of business did you run?

19 **A Actually I ran the first closet organizing**

20 **business in Western Maryland.**

21 Q Oh.

22 **A It started in 1982 and continued that till**

10

1 **2014.**

2 Q That's fascinating. And what did you teach?

3 **A I taught music and theater.**

4 Q What grades? Just out of curiosity.

5 **A Seven through 12, but mostly high school.**

6 Q I bet that was a fun job.

7 **A It was a fun job that I finally had to give**

8 **up when my children were born because it's a lot a**

9 **lot of hours, many hours.**

10 Q We all can relate. Do you recall when you

11 first registered to vote?

12 **A When I came back from college, and I think**

13 **it was for sure 1972. I believe we have records to**

14 **that.**

15 Q Okay. And so you said when you came back

16 from college. Were you living in Thurmont at that

17 time?

18 **A No, I came back from college -- we lived in**

19 **Frederick at the time, and we rented in Frederick.**

20 Q Okay. And do you recall what congressional

21 district you were living in at that time?

22 **A I think it was all in the 6th District at**

11

1 **that time. I believe.**

2 Q And do you recall who your congressional

3 representative was at that time?

4 **A I believe it was Beverly Byron. She was a**

5 **Democrat.**

6 Q When you first registered to vote in 1972 do

7 you recall how often you voted?

8 **A With a few exceptions, and I'm not even sure**

9 **if there are any exceptions, I voted every year.**

10 **Every cycle.**

11 Q Up to the present?

12 **A Yes.**

13 Q And when you say every cycle does that

14 include primary elections?

15 **A I was registered as an Independent from '72**

16 **until approximately 2001. And my wife and I both**

17 **decided at that time that we -- in order to be able**

18 **to vote in the primaries we decided to register as**

19 **Republicans.**

20 Q So between 1972 and 2001 when you were

21 registered as an Independent, I just want to make

22 sure I understand your testimony, during that time

12

1 you believe that you voted in every general

2 election?

3 **A That's correct.**

4 Q Okay. And does that include presidential --

5 general presidential elections?

6 **A Certainly.**

7 Q And gubernatorial elections?

8 **A Certainly.**

9 Q And do you recall if you always voted for

10 your -- for a congressional representative?

11 **A Yes, certainly.**

12 Q Okay. Since 2001 when you've been a

13 registered Republican have you voted in the primary

14 elections?

15 **A Yes.**

16 Q Do you think all of them that you've been

17 able to vote in?

18 **A Yes. We are very good at voting.**

19 Q Do you recall ever missing an opportunity to

20 vote?

21 **A Not really, no.**

22 Q Okay.

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1 **A I mean it's possible, but in the last 40**
2 **some years, I don't think so.**
3 Q So just so I'm clear, did you vote in the
4 2012 primary election?
5 **A Yes.**
6 Q And the 2012 general election?
7 **A Yes.**
8 MR. STEIN: Can you clarify which primaries?
9 MS. KATZ: I think I said 2012 primary
10 election.
11 MR. STEIN: I mean presidential or --
12 MR. MEDLOCK: Congressional.
13 MR. STEIN: -- congressional.
14 **A I voted in both the Maryland and the**
15 **congressional and the presidential. I voted in all**
16 **of the categories in that cycle of 2012.**
17 Q And would you say the same for the 2016
18 cycle?
19 **A I would.**
20 Q And in 2014 did you vote in the primary
21 election for governor?
22 **A Yes.**

14

1 Q And did you also vote in the primary
2 election for congressional representative in 2014?
3 **A Certainly.**
4 Q And did you vote in the general election in
5 2014?
6 **A Yes, ma'am.**
7 Q Okay. Thank you. So I believe you told me
8 that from the time you registered to vote in 1972
9 until 2001 you were registered as an Independent?
10 **A That's correct.**
11 Q Throughout that entire time you were
12 registered as an Independent?
13 **A I was.**
14 Q Okay. And since 2001 to the present you're
15 a registered Republican?
16 **A That's correct.**
17 Q And has that changed from 2001 to the
18 present?
19 **A No.**
20 Q Have you always been registered as a
21 Republican?
22 **A Yes.**

15

1 Q Have you ever voted for a candidate who was
2 not a Republican?
3 **A Yes.**
4 Q Do you recall when?
5 **A Do you mean recently or do you --**
6 Q Let me ask you this. Do you recall the
7 first time you voted for a candidate who was not a
8 Republican?
9 **A Yes. And I can't tell you exactly what**
10 **year, but I voted for Beverly Byron who was the**
11 **Democratic representative. Other than that I can't**
12 **think of another Democratic candidate that I voted**
13 **for on that level.**
14 Q On the level of congressional
15 representative?
16 **A Yes, ma'am.**
17 Q Okay. And do you recall ever voting for a
18 Democratic candidate that was not a candidate for
19 your congressional representative?
20 **A For presidential candidates I voted for two**
21 **Democrats recently, Obama and Clinton. Obama twice**
22 **and Clinton. I don't recall ever voting for a**

16

1 **particular party while I was an Independent, if you**
2 **see what I'm saying. I can't remember exactly who I**
3 **voted for, but it was possible that I voted for a**
4 **Republican in one cycle and a Democrat in the next**
5 **at that point.**
6 Q And I just want to clarify. When you said
7 Clinton in your prior answer are you referring to
8 Hillary?
9 **A Hillary Clinton.**
10 Q Do you recall if you voted for Bill Clinton?
11 **A I don't think so.**
12 Q Okay.
13 **A I'm almost certain that I voted Republican**
14 **then. I can assure you actually that I didn't.**
15 Q Do you recall if you voted for Beverly Byron
16 more than once?
17 **A I don't. But I think it was probably more**
18 **than once because I recall when she was defeated in**
19 **the primary, which was a big upset, and when Roscoe**
20 **Bartlett. That's been quite awhile ago, though.**
21 Q Okay.
22 **A But I voted for either her husband or her in**

17

1 that time period from '72. I mean they were the
 2 only Democrats that I recall voting for as
 3 congressional representatives.
 4 Q And just to be clear, when you referred to
 5 her husband did you mean Goodloe Byron?
 6 A I did.
 7 Q Okay, thank you. Why did you vote for
 8 Goodloe Byron?
 9 A I knew the family. I grew up, of course,
 10 above northern -- in the northern area in Maryland
 11 above Frederick, but I knew many people, of course,
 12 in Frederick County. And the Byron family was one
 13 of them. As a matter of fact, I knew many of the
 14 kids in the area because I was about the same age.
 15 Q And when you recall voting for Beverly Byron
 16 do you recall why you voted for her?
 17 A I do because she was a Frederick County
 18 native, and she had strong support even as a
 19 Democrat in the county because she was -- she and
 20 her husband were both proficient at providing good
 21 representation.
 22 Q How do you define that, providing good

18

1 representation?
 2 A They were familiar with -- as natives they
 3 were familiar with the county, the residents both
 4 north, east, south and west, and the city of
 5 Frederick. And they were very aware of -- they were
 6 very aware of the groups and types and I guess of
 7 who they were representing. I think that's probably
 8 it. In other words, they could tell you
 9 specifically what went on in this town and that
 10 section and the farms over there. In other words,
 11 they knew the area because of their background. And
 12 we all knew that they knew us.
 13 Q Okay. You referred to Beverly Byron's
 14 primary defeat?
 15 A Um-hum.
 16 Q Do you recall if in that year if you voted
 17 in the general election for Roscoe Bartlett?
 18 A I did.
 19 Q Okay. And do you recall whether you voted
 20 -- ever voted for someone other than Roscoe Bartlett
 21 when he was on the ballot?
 22 A No.

19

1 Q Okay. In 2012 do you recall who you voted
 2 in the general election to be your congressional
 3 representative?
 4 A I voted for the Republican candidate at that
 5 time.
 6 Q The same question for 2014.
 7 A The same.
 8 Q And then the same question for 2016.
 9 A Yes, ma'am, the same.
 10 Q What are the qualities that you look for in
 11 a political candidate?
 12 MR. STEIN: Object. Vague.
 13 A I think their knowledge of the communities
 14 that they are going to serve is paramount and
 15 certainly their -- the approach to their
 16 representation. In other words, are they going to
 17 be able to recognize in their district all of the
 18 segments and be able to give each of those proper
 19 representation. I believe that's a big -- a very
 20 large part of this, being able to cover the area
 21 that they are elected to cover.
 22 Q Thank you. Have you ever attended an event

20

1 held by your congressional representative?
 2 A Well, not by congressional, no. I have
 3 attended state representative events but never
 4 congressional, no.
 5 Q And I realize that you've been represented
 6 by a congressional representative for a number of
 7 years now.
 8 A Yes.
 9 Q So I'm asking you to think back into the
 10 1970s if you can recall ever having attended an
 11 event.
 12 MR. STEIN: I will object as vague.
 13 Q Yeah. Do you recall ever having attended an
 14 event held by either your congressional
 15 representative either when you first registered to
 16 vote up to the present?
 17 A No. I'm certain of that.
 18 Q Okay. Have you ever volunteered on a
 19 campaign for a political candidate?
 20 A I have. David Brinkley is a friend of mine.
 21 And I believe he started his political career about
 22 20 years ago. He's currently, of course, the --

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1 well, you know who he is. He's the one that pays
2 you. Or gives you your budget.
 3 Q Was that the only campaign?
 4 **A Yes. Really it is.**
 5 Q Okay. And so you probably inherently
 6 answered this. But have you ever worked as a paid
 7 employee on a campaign?
 8 **A No, I have not.**
 9 Q Have you ever worked as a paid employee for
 10 a politician in any form?
 11 **A No, I have not.**
 12 Q Okay. And again, I'm asking you to recall a
 13 significant period of time. But do you recall ever
 14 contacting any of your congressional representatives
 15 constituent services?
 16 **A I would say that in the period of 40 plus**
17 years that my wife and I have sent letters or
18 responses to our congressional representatives. I
19 can't tell you now what the objective was at that
20 point, but we have, in fact, responded to whatever
21 the issue was at the time.
 22 Q Can you recall with specificity any of those

22

1 letters that you may have sent?
 2 **A No. There have been so many issues that I**
3 simply couldn't put into words which ones were
4 specific.
 5 Q And when you say issues, I'm just trying to
 6 get a sense of what that means. Does that mean
 7 issues that were personal to you, things that you
 8 may have needed help for from your representative?
 9 **A Well, let's say the redistricting issue.**
10 That's the type of thing that I would respond to and
11 ask my congressional representative to pursue the
12 reason why it is what it is at this moment.
 13 Q So when you say issues do you mean
 14 political?
 15 **A I mean political issues, yes.**
 16 Q Thank you.
 17 **A That all are aware of. And that become**
18 issues. Hot issues. The issue of the day.
 19 Q At the very least, issues that were
 20 important to you, right?
 21 **A Yes, that's correct.**
 22 Q Okay. And so you mentioned redistricting.

23

1 Do you recall -- do you recall specifically writing
 2 a letter about redistricting?
 3 **A I do not.**
 4 Q Okay. And you don't recall any particular
 5 issue specifically that you may have --
 6 **A On redistricting at this moment? Well, you**
7 have to realize that during the '70s, especially in
8 the '80s and the '90s -- let's face it, every decade
9 has its issues, but I think that these were broader
10 issues, national issues, things that many people
11 responded to. I would not say that these were
12 something that I wrote to and said a tree just fell
13 on my house. Can you help me?
 14 Q Okay, great. Thank you. Do you recall if
 15 you've written any such letters since 2012?
 16 **A No, I have not.**
 17 Q Do you recall if you've contacted your
 18 congressional representative in any way since 2012?
 19 **A No, I haven't. And I guess I could skip to**
20 the fact that I was almost assured that it didn't
21 matter if I contacted them because they probably
22 wouldn't know who I was, where I lived or what I was

24

1 asking about anyhow.
 2 Q Okay. Do you recall when was the first time
 3 you became interested in redistricting as an issue?
 4 **A I would say from the beginning of the**
5 current redistricting and as it was looked -- as it
6 was looked into and finally got to the referendum.
7 I mean all of that was an issue that I was
8 interested in, of course, because I felt it was
9 unfair to our community.
 10 Q And prior to the redistricting in 2011 that
 11 you're referring to did you have an interest in
 12 redistricting?
 13 **A No.**
 14 MR. STEIN: Object as vague. Sorry. Go for
 15 it.
 16 **A No. Frederick County as far as I know the**
17 6th District had been in pretty much the same
18 configuration for -- I have no idea how many years.
19 But, you know, the 2011 redistricting was should I
20 say much exaggerated from anything else I had ever
21 seen or heard of. So it was quite a shock to me to
22 see that the patterns that were evolved were there.

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1 Q And when did you first find out about the
2 2011 congressional redistricting plan?
3 A I read the newspaper, the local newspaper.
4 And it was complete with the redistricting maps and
5 so forth.
6 Q Okay. Do you recall when you might have
7 first read about it in the newspaper?
8 A I do not. I will tell you that, of course,
9 the latest was probably in what, the beginning of
10 2016, after this initial trial that this law firm
11 handled before the Supreme Court I understand. I
12 read the papers and the same argument, not argument
13 but the same models and the same patterns, the same
14 maps and so forth that were being discussed at that
15 time were just -- well, they were presented
16 basically the same way.
17 Q Did you testify before the governor's
18 redistricting advisory --
19 A No.
20 Q -- committee? Did you post any public
21 comments after the plan was revealed to the public?
22 A No.

26

1 Q Do you recall if you voted -- how you voted
2 on the referendum involving the redistricting plan?
3 A Well, I will tell you that the referendum as
4 presented on the ballot was so manipulated, I guess
5 is the term I might use, certainly was confusing.
6 And if I can give my opinion I would say that most
7 of the people that voted for the referendum didn't
8 know if they were voting for or against it because
9 it was so difficult to understand what your point
10 was. In other words, did you say yes to not having
11 it or no to having it? You see what I'm getting at?
12 And I believe the referendum would have gone -- I
13 believe we would have voted -- I say we. I think
14 especially the voters in our district would have
15 certainly voted against this current redistricting
16 if we would have had a yes or a no answer to that.
17 Q Do you recall if you voted -- how you voted
18 on that referendum?
19 A I can't tell you if I voted yes or no,
20 because I'm not sure to this day if I understood.
21 When I walked out of the voting booth I had no idea,
22 and I realized that no one else did.

27

1 Q Okay.
2 A Have you read that paragraph?
3 Q I have.
4 A It's very tough.
5 Q Do you recall -- do you recall if before you
6 stepped into the voting booth to vote on the
7 referendum, do you recall knowing that the
8 referendum was going to be on the ballot?
9 A Yes.
10 Q Okay.
11 A I was pleased that it was.
12 Q Great. Other than joining this lawsuit have
13 you taken any action about redistricting after the
14 passage of the 2011 plan?
15 MR. STEIN: Object. Vague.
16 A No, I haven't taken any action except voting
17 for the referendum, for or against or.
18 Q Got it. Mr. Eyler, how did you first hear
19 about this lawsuit?
20 A Actually my son was a neighbor and a
21 classmate of Michael Kimberly who is an associate of
22 this law firm and --

28

1 Q I know him well.
2 A Right. So this came up in a discussion at a
3 family get-together, neighbor get-together, and I
4 was aware that Michael had done the first -- the
5 Supreme Court part of this and that it's been kicked
6 back to this point. That was all I was aware of
7 until Michael said, "You're from the 6th District".
8 Because he had been to my house and he knew that
9 that's where we lived. And he said, "Would you be
10 interested in being a plaintiff in this?". And I
11 said certainly.
12 Q And the Michael you're referring to is
13 Michael Kimberly?
14 A Michael Kimberly.
15 Q And you may have talked about this to some
16 agree. But why did you decide to join the lawsuit?
17 A It's fairly simple. I'm still very much
18 opposed to the redistricting of our area, and I
19 thought if this is a means to an end that I would
20 gladly help out.
21 Q You said that your son was a neighbor of
22 Michael Kimberly's?

29

1 **A Yes.**
 2 Q Who is your son?
 3 **A Gus Eyler. He's also an attorney by the**
 4 **way. That's another -- they all stick together.**
 5 MR. MEDLOCK: I'm going to object to your
 6 characterization.
 7 THE WITNESS: Okay. Yeah, well.
 8 Q Do you think you were harmed by the 2011
 9 congressional redistricting?
 10 MR. STEIN: Object as vague and ambiguous.
 11 **A I do.**
 12 Q You can answer.
 13 **A I do.**
 14 Q How so?
 15 **A I think that our region, if that's the right**
 16 **term, our community has not had the representation,**
 17 **may I say a more human level of representation, than**
 18 **when the 6th District was more inclusive and did not**
 19 **have that incredible attachment to Montgomery County**
 20 **which now exists.**
 21 Q When you say human level of representation
 22 what do you mean by that?

30

1 **A I mean that the representative of that area**
 2 **actually understands the area, visits the area,**
 3 **talks to the people. I'm talking about a background**
 4 **of understanding the -- not just the geography but**
 5 **the sentiments more or less of the population in**
 6 **that area, which is something that had happened**
 7 **since I can recall living in Frederick County all my**
 8 **life. We always had a representative who was, may I**
 9 **just say, local and understood the county and the**
 10 **district. Now we have someone that certainly isn't**
 11 **too interested in our area because as a politician**
 12 **he understands that we are -- we don't contribute**
 13 **anything to his wellbeing and I would say that it's**
 14 **just -- he doesn't represent much to our wellbeing.**
 15 Q Who are you referring to right now when you
 16 say he?
 17 **A I think Van Hollen at this point.**
 18 Q And on what do you base your statement that
 19 he isn't too interested in the area?
 20 **A Because we're typically a Republican**
 21 **conservative group in the area and he has an**
 22 **overwhelming majority in Montgomery County. I don't**

31

1 **know what Montgomery County is, the percentage of**
 2 **Democratic voters, but I would say that it's -- the**
 3 **amount of Democrats registered in Montgomery County**
 4 **far outweighs any Republicans registered in our**
 5 **small area in northern Frederick County. And the**
 6 **redistricting certainly split all of that up. I**
 7 **would say divide and conquer would be kind of the**
 8 **term I'm looking for.**
 9 Q And you were just speaking about Chris Van
 10 Hollen; is that right?
 11 **A Yes.**
 12 Q Have you had any interactions or
 13 communications with him?
 14 **A No. Chris Van Hollen, as far as I know, has**
 15 **been to our area one time. I wasn't able to make**
 16 **it, but he did have a sort of a town hall meeting at**
 17 **the library.**
 18 Q And when you say our area, do you mean
 19 Thurmont?
 20 **A I mean northern Frederick County and**
 21 **Thurmont specifically.**
 22 Q Okay. And I know he was just sworn in

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1 recently. But what about your new representative,
 2 Jamie Raskin, have you had any interactions with
 3 him?
 4 **A I have no idea of what he has done or will**
 5 **do.**
 6 Q Okay.
 7 **A Yeah.**
 8 Q You just know -- what do you know about him?
 9 **A Not that much to be perfectly honest with**
 10 **you. And that's I think the difference.**
 11 Q Okay.
 12 **A I don't know much about him.**
 13 Q So you stated that somebody who is local or
 14 understands the area, visits the area, talks to the
 15 people there, those are the -- is it correct to say
 16 that those are some of the qualities you look for in
 17 a candidate?
 18 MR. STEIN: Object. Mischaracterizes the
 19 testimony.
 20 **A I think that's actually what a politician is**
 21 **supposed to do.**
 22 Q And so do those qualities matter more to you


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1 than someone's political party?
 2 **A Well, let me just state it this way. The**
 3 **political party in national elections, for instance,**
 4 **the presidential election, doesn't have as much**
 5 **gravity as local elections especially when you have**
 6 **neighborhoods, or in this case an area. Let's say**
 7 **northern Frederick County and the old 6th District,**
 8 **which included Washington, Allegheny, Garrett. The**
 9 **people residing in that area are much more -- well,**
 10 **they're certainly not the urban or suburban grouping**
 11 **that you might find in Montgomery County. So there**
 12 **is such an immediate difference to those who've**
 13 **lived here all their life. I've made 256 trips to**
 14 **Kensington in the last five years to visit my**
 15 **grandchildren. We figured it up the other day. But**
 16 **I don't in other terms have any dealings with**
 17 **Montgomery County, if you follow what I'm saying,**
 18 **and I think the reverse is true of the politicians**
 19 **and the people that deal with the district as it**
 20 **stands now.**
 21 MS. KATZ: Okay. I think that I'm done
 22 asking you questions. I'm going to take a

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1 five-minute break, and I'll come back and wrap up.
 2 THE WITNESS: Sure.
 3 MS. KATZ: And your lawyers may ask you some
 4 follow-ups.
 5 (A recess was taken.)
 6 (C. Eyler Deposition Exhibit 14 was marked
 7 for identification and is attached to the
 8 transcript.)
 9 MS. KATZ: So I do not have any further
 10 questions for you. Thank you, very much. I don't
 11 know if your --
 12 MR. STEIN: We don't have any questions
 13 either.
 14 (Off the record at 2:10 p.m.)
 15
 16
 17
 18
 19
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1 CERTIFICATE OF SHORTHAND REPORTER-NOTARY PUBLIC
 2 I, Sandra A. Slater, the officer before whom
 3 the foregoing deposition was taken, do hereby
 4 certify that the foregoing transcript is a true and
 5 correct record of the testimony given; that said
 6 testimony was taken by me stenographically and
 7 thereafter reduced to typewriting under my
 8 direction; that reading and signing was not
 9 requested; and that I am neither counsel for,
 10 related to, nor employed by any of the parties to
 11 this case and have no interest, financial or
 12 otherwise, in its outcome.
 13 IN WITNESS WHEREOF, I have hereunto set my hand
 14 and affixed my notarial seal this 3rd day of
 15 February, 2017.
 16 My Commission Expires:
 17 April 12, 2017
 18 *Sandra A. Slater* 
 19 _____
 20 NOTARY PUBLIC IN AND FOR
 21 THE STATE OF MARYLAND
 22

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