

1 recess the deposition --

2 MR. PETERS: Okay.

3 MR. SPEAS: -- until we get the answers
4 to the interrogatories or -- and resolve -- or
5 resolve the privilege question.

6 MR. PETERS: Okay.

7 MR. SPEAS: And with that, thank you.

8 MR. PETERS: I have just one or two
9 questions just to make sure the record is
10 clear.

11 EXAMINATION

12 BY MR. PETERS:

13 Q. Mr. Frey, let me ask you to look at what has
14 been marked as Exhibit Number 9.

15 MR. SPEAS: I'm sorry. Which exhibit?

16 MR. PETERS: 9. The third affidavit.

17 MR. SPEAS: Okay.

18 BY MR. PETERS:

19 Q. Let me to ask you to look at Exhibit 73-A to
20 that -- let me back up. 68-A. Do you have
21 that?

22 A. Yes.

23 Q. And do you recall being asked some questions by
24 Mr. Speas about this map?

25 A. Yes.

1 Q. And I believe you said that you were the one
2 who had noted where on the map incumbents live;
3 is that correct?

4 A. Yes, I believe so.

5 Q. Is there anything else you did with this map?

6 A. I seem to recall what I received was the
7 district configurations and what we did was to
8 put on the county groupings and the incumbent
9 locations.

10 Q. Let me direct you down to the key at the bottom
11 where it shows a bold blue line and it says
12 LDD4 Grouping.

13 A. Yes.

14 Q. Do you know what that stands for?

15 A. Well, LDD4 would be Lewis-Dollar-Dockham 4,
16 which is the 2011 enacted House Plan, so the
17 groupings that were associated with that
18 district plan.

19 Q. Then let me ask you to look at Exhibit 73-A.
20 And did you do a similar thing with that map?

21 A. Yes. It's virtually identical except it's
22 Rucho Senate RS2 Grouping or Rucho Senate 2.

23 MR. PETERS: That's all I've got.

24 Thank you.

25 MR. SPEAS: Do we have anything else?