

EXHIBIT 11

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF RHODE ISLAND

KAREN DAVIDSON,
DEBBIE FLITMAN,
EUGENE PERRY,
SYLVIA WEBER, and
AMERICAN CIVIL LIBERTIES UNION
OF RHODE ISLAND
Plaintiffs

VS.

C.A. No. 1:14-cv-00091-L-LDA

CITY OF CRANSTON, RHODE ISLAND
Defendant

DEPOSITION OF STEVEN BROWN, a Witness in the
above-entitled case, taken on behalf of the
Defendant, before Linda L. Guglielmo, RPR-RMR, a
Notary Public in and for the State of Rhode
Island, at the offices of Partridge Snow & Hahn,
LLP, 40 Westminster Street, Providence, Rhode
Island on February 25, 2015 at 9:00 A.M.

APPEARANCES:

FOR THE PLAINTIFFS.....DEMOS

BY: ADAM LIOZ, ESQ.
BRENDA WRIGHT, ESQ.
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WASHINGTON, DC 20005

FOR THE DEFENDANT.....PARTRIDGE SNOW & HAHN, LLP

BY: NORMAND G. BENOIT, ESQ.
40 WESTMINSTER STREET
PROVIDENCE, RI 02903

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1 A. Yes.

2 Q. Did you review it before it was filed with the
3 court?

4 A. Yes.

5 Q. Did you have any input as to the contents of the
6 complaint?

7 A. I discussed it with counsel, yes.

8 Q. Is there anything in this complaint that you
9 disagree with?

10 A. No.

11 Q. Is there anything you feel you need to add to this
12 complaint?

13 A. No.

14 Q. When did the ACLU, again, referring to the Rhode
15 Island --

16 A. Yes.

17 Q. -- first get interested in the issue of where the
18 prisoners at the ACI ought to be counted for
19 redistricting purposes?

20 A. I'm bad at dates, but I would estimate it was
21 maybe five or six years ago.

22 Q. How did that issue first come to the attention of
23 the ACLU?

24 A. It first came to my attention through a
25 person named Bruce Reilly who worked at a

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1 community group in Providence called DARE. He is
2 the one that first brought that issue to my
3 attention.

4 Q. What has the ACLU done with respect to this issue
5 since it first came to your attention?

6 A. We've done a number of things. We have
7 testified both at the state and city council
8 level. At the state level it was when the state
9 Redistricting Commission was meeting to redraw
10 district lines from the 2010 census. We testified
11 before the Cranston City Council in 2012 when they
12 were re-drawing local lines, and we've also
13 testified in support of legislation that's been
14 introduced in the past few years at the State
15 Legislature that would address this issue.

16 Q. Before the Cranston City Council, was that you
17 that personally testified, or was it someone else
18 from the ACLU?

19 A. It was somebody else from the ACLU, one of my
20 staff.

21 Q. Okay. You testified before the Rhode Island
22 General Assembly or committees on this legislation
23 that you referred to?

24 A. Yes.

25