

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF TEXAS
DALLAS DIVISION

ANNE HARDING, et al.,

Plaintiffs,

v.

COUNTY OF DALLAS, TEXAS,
et al.,

Defendants.

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C.A. NO. 3:15-CV-00131-D

DEFENDANTS' SUPPLEMENTAL APPENDIX TO THEIR BRIEF IN OPPOSITION
TO PLAINTIFFS' MOTION FOR PARTIAL SUMMARY JUDGMENT

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Deposition Errata Sheet for Matt Angle..... 1-2

Dated: December 22, 2017.

Respectfully submitted,

BRAZIL & DUNN

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Counsel for Defendants

CERTIFICATE OF SERVICE

I hereby certify that on this 22nd day of December 2017, a true and correct copy of the foregoing was served by the Court's Electronic Case Filing System on all counsel of record.

By: /s/ Chad W. Dunn
Chad W. Dunn

Anne Harding, et al. V. County of Dallas Texas, et al
Transcript – Matthew Angle, Expert on 11/08/2017

Errata Sheet

Page No. 28, Line No. 16, Change to: 5

Reason for change: I did not take into account myself and a part-time employee.

Page No. 28, Line No. 19, Change to: 8

Reason for change: I did not take into account employees often added during election season.

Page No. 31, Line No. 6, Change to “I may not get this exactly right.”

Reason for change: Appears to be a mistake in transcription

Page No. 31, Line No. 7, Change to: Fikes (phonetic), Lisa Blue (phonetic), Communication

Reason for change: Provided correct spelling of names.

Page No. 45, Line No. 7, Change to: I believe it has “other” as a category. Reason for change: In reviewing document, the category does not use the term “Asian”, but Asian population is included with the “other” population. [This information was included in the August 22, 2017 report on page 17 (attached) showing demographics of adopted map and in Exhibit 4 (attached) for the 4 proposed maps.]

Page No. 49, Line No. 21, Change to: No.

Reason for change: I misinterpreted the question and believed counsel was asking if following the redistricting criteria resulted in three majority-minority districts in the 2011 plan. As I explained in other parts of my deposition, in order to comply with the Voting Rights Act, I intentionally drew an effective opportunity district for African American voters and an effective opportunity district for Latino voters. I also intentionally drew a third district dominated by Tea Party voters. The fourth district ended up as a majority-minority district, but at no time was I instructed to draw three-majority minority districts nor did I set out to do so.

Page No. 68, Line No. 8, Change to: Yes, Precinct 1032 is adjacent to the south to Precinct 1033, which is adjacent to Precincts 1035 & 1036. So, the connection of Precinct 1032 to District 1 is contiguous through the City of Dallas and not attached only through its border with Richardson.

1 DEPOSITION ERRATA SHEET

2

3 Our Assignment No. 181923

4 Case Caption: Harding v. Dallas County

5

6 DECLARATION UNDER PENALTY OF PERJURY

7 I declare under penalty of perjury

8 That I have read the entire transcript of

9 My deposition taken in the captioned matter or the
10 same has been read to me, and

11 The same is true and accurate, save and

12 Except for changes and/or corrections, if

13 Any, as indicated by me on the DEPOSITION ERRATA

14 SHEET hereof, with the understanding

15 That I offer these changes as if still under

16 Oath.

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18 Signed on the 11 day of

19 December, 2017.

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MATTHEW ANGLE, EXPERT