

Exhibit A



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Transcript of Jonathan Rodden, Ph.D.

Date: September 14, 2017

Case: Bethune-Hill, et al. -v- Virginia State Board of Elections, et al.

Planet Depos

Phone: 888-433-3767

Fax: 888-503-3767

Email: transcripts@planetdepos.com

www.planetdepos.com

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Conducted on September 14, 2017

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1 What I try to do in my report is take seriously the
2 alternative way of drawing districts, which is to
3 abide by a traditional redistricting criteria and to
4 examine the extent to which efforts to achieve the
5 55 percent racial target ran up against or
6 conflicted with that effort to abide by traditional
7 redistricting criteria.

8 So when I talk about predominance, I'm
9 talking about the clash between those two approaches
10 to redistricting. And I try throughout my report to
11 directly contrast those approaches and show
12 situations in which it's quite clear that when a
13 choice had to be made between abiding by traditional
14 redistricting principles and achieving the racial
15 target, the only way to achieve the racial target
16 was to focus on race and let the other criteria fall
17 into a subordinate position.

18 Q So your analysis that race predominated is
19 based upon the conflict between the districts as
20 structured and traditional redistricting criteria?

21 A Yes.

22 Q And that's the extent of it?

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1 A Yes. That's my understanding of what the
2 Supreme Court was asking for in its decision.

3 Q On Page 5, the top sentence of Page 5, you
4 say, "This report explains the nuts and bolts of how
5 the Legislature achieved the 55 percent racial
6 target..."

7 Your report talks about plans, correct, the
8 actual plans, what they looked like?

9 A Yes.

10 Q But it doesn't address the nuts and bolts of
11 the legislative process, does it?

12 A Not the legislative process, no.

13 Q So you have no knowledge on that issue?

14 A My knowledge is limited to what I can infer
15 from the data I have collected. And I did not
16 conduct interviews with legislators and I do not
17 have that type of qualitative information beyond
18 statements they have made to the Court.

19 Q So you did not interview any Virginia house
20 members?

21 A No, sir.

22 Q And did you interview any Virginia elected

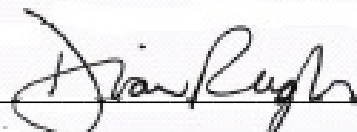
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CERTIFICATE OF SHORTHAND REPORTER

I, Diane Rugh, the officer before whom the foregoing deposition was taken, do hereby certify that the foregoing transcript is a true and correct record of the testimony given; that said testimony was taken by me stenographically and thereafter reduced to typewriting under my direction; that reading and signing was not requested; and that I am neither counsel for or related to, nor employed by any of the parties to this case and have no interest, financial or otherwise, in its outcome.

IN WITNESS WHEREOF, I have set my hand this 20th day of September 2017.



DIANE RUGH, RPR, RMR, CRR

CCR No. 2399