

1 UNITED STATES DISTRICT COURT

2 SOUTHERN DISTRICT OF FLORIDA

3 CUBANOS PA'LANTE, et al.,)

4)
5 Plaintiffs,)

6 v.)

Case No.

1:24-cv-21983-JB

7 FLORIDA HOUSE OF)

8 REPRESENTATIVES)

9 And CORD BYRD, in his)

10 official capacity as)

11 Florida Secretary of State,)

12 Defendant.)
13)
14)
15)
16)
17)
18)
19)
20)
21)
22)
23)
24)
25)

The Remote Deposition

of

CAROLYN B. ABOTT, PHD,

MONDAY, JUNE 30TH, 2025

09:30 AM EST

JOB NO.: 586371

Pages 1 - 202

Reported stenographically by:

STANLEY H. SAKAI, CRC

Transcript of Carolyn B. Abbott, Ph.D.

Conducted on June 30, 2025

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1 Deposition of CAROLYN ABBOTT PH.D, held
2 remotely pursuant to notice before STANLEY H.
3 SAKAI, CRC, a realtime shorthand reporter, a
4 Certified Realtime Captioner, and Notary Public in
5 and for the State of New York.
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1 P R O C E E D I N G S

2 THE COURT REPORTER: Will counsel please
3 voice-identify and -- identify themselves for
4 the record?

5 ATTORNEY JONES: Patrick Jones, O'Melveny
6 & Myers for the Plaintiffs and the witness.

7 I'm joined here by my colleague, Andrea
8 Ojeda.

9 ATTORNEY BARDOS: Andy Bardos with the
10 GrayRobinson law firm on behalf of the Florida
11 House of Representatives.

12 ATTORNEY CARTAYA: Carmen Manrara Cartaya
13 on behalf of the Florida House of
14 Representatives from the law firm Continental
15 PLLC.

16 Good morning, everyone.

17 ATTORNEY RABAN: Randall Raban with law
18 firm Holtzman Vogel, here on behalf of
19 Depart -- the House of Representatives .

20 THE COURT REPORTER: Is that it?

21
22 WHEREUPON,

23 CAROLYN B. ABBOTT, PH.D,

24 called as a witness, having been first duly
25 sworn or affirmed by a Notary Public to testify to

09:19:15

09:19:15

09:19:15

09:37:00

09:37:02

09:37:06

09:37:08

09:37:11

09:37:13

09:37:15

09:37:18

09:37:19

09:37:20

09:37:24

09:37:25

09:37:29

09:37:30

09:37:34

09:37:42

09:37:42

09:37:42

09:37:42

09:37:42

09:37:42

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1 the truth, the whole truth, and nothing but the 09:37:42
2 truth, was examined and testified as follows: 09:37:42

EXAMINATION

BY ATTORNEY BARDOS: 09:38:00

4 09:37:42
5 09:38:02
6 Q. Thank you. And good morning, Dr. Abbott. 09:38:03
7 Thanks for joining us this morning. I'm Andy 09:38:08
8 Bardos, and I'll be asking you questions today about 09:38:08
9 your expert reports in this case. But we'll start 09:38:11
10 with a couple of preliminaries. One is, of course, 09:38:14
11 if at any point you need a break, please just let me 09:38:17
12 know, and we'll -- we'll accommodate that. 09:38:19

13 It's important for the court reporter to 09:38:24
14 be able to create a clear transcript of today's 09:38:25
15 proceeding. So let's take turns rather than speak 09:38:32
16 over each other. That's important for the clarity 09:38:34
17 of the record. I'll try to let you finish your 09:38:36
18 answers, and if you could let me finish my questions 09:38:39
19 before you begin, that will help the court reporter. 09:38:42

20 Is there any reason why, today, you might 09:38:46
21 not be able to answer questions truthfully and 09:38:51
22 fully? 09:38:54

A. No. 09:38:55

Q. Okay. 09:38:56

Okay. Let's -- let's begin with some 09:39:03

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1 nomenclature. If I refer to the "enacted map" or
2 the "enacted district," I'll be referring to the
3 2022 congressional map and the 2022 state house map
4 that were enacted by the Florida legislature.

5 Does that sound reasonable?

6 A. Yes.

7 Q. Okay. And when I refer to the "benchmark
8 map" or the "benchmark districts," I'll be referring
9 to the redistricting plan or the redistricting -- or
10 the districts that were in effect before the 2022
11 maps were enacted; is that fair?

12 A. Yes.

13 Q. And if I refer to "VAP," I'm referring to
14 voting-age population. Likewise, if I refer to
15 "HVAP," I'm referring to Hispanic voting-age
16 population; does that sound fair?

17 A. Yes.

18 Q. And sometimes, I'll refer to a
19 congressional district simply by saying "CD," such
20 as "CD 26," that will be Congressional District 26.

21 Will you understand me when I say that?

22 A. Yes.

23 Q. Let's begin at the beginning.

24 When were you retained in this litigation?

25 A. I believe I was first contacted last

09:39:06

09:39:09

09:39:14

09:39:17

09:39:20

09:39:21

09:39:22

09:39:25

09:39:28

09:39:32

09:39:36

09:39:38

09:39:39

09:39:42

09:39:46

09:39:51

09:39:53

09:39:53

09:39:55

09:39:58

09:40:03

09:40:05

09:40:06

09:40:08

09:40:10

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1 summer, so I think July of 2024. 09:40:13

2 Q. And who contacted you in July of 2024? 09:40:16

3 A. Nick Warren, the ACLU of Florida. 09:40:21

4 Q. And between July of 2024 and the time that 09:40:28
5 your work on this case -- or let me ask you: When 09:40:32
6 did your work on this case begin? 09:40:36

7 A. It began not long after I was contacted. 09:40:39

8 ATTORNEY BARDOS: Okay. All right. Let 09:40:42
9 me share an exhibit. I'll first drop it into 09:40:44
10 the chat. And we're starting with Exhibit 5. 09:40:49

11 (Plaintiffs' Exhibit No. 5 was 09:41:02
12 marked for identification.) 09:41:02

13 Q. Okay. Can you see on your screen a letter 09:41:29
14 dated February 28th, 2025? 09:41:31

15 A. Yes. 09:41:34

16 Q. Okay. Do you recognize this letter? 09:41:34

17 A. Yes, I do. 09:41:37

18 Q. Is what was this letter? 09:41:40

19 A. This is a letter asking me -- giving me 09:41:42
20 instructions on an assignment for this case to write 09:41:45
21 an expert report. 09:41:50

22 ATTORNEY JONES: Just for the record that, 09:42:07
23 I don't think I see it in the chat. I don't -- 09:42:07
24 I'm not seeing it. 09:42:12

25 THE COURT REPORTER: Sorry. Who was 09:42:14

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1	speaking right there? This is the court	09:42:15
2	reporter.	09:42:15
3	ATTORNEY JONES: This is Patrick Jones.	09:42:16
4	THE COURT REPORTER: Thank you.	09:42:17
5	ATTORNEY BARDOS: I neglected to hit send,	09:42:18
6	so it should be appearing in the chat now.	09:42:18
7	Q. And, Dr. Abbott, if at any point, when I'm	09:42:23
8	sharing exhibits, if you want me to scroll up or	09:42:27
9	down or enlarge it or shrink it, just let me know,	09:42:27
10	and I'll display it the way that you want to see it.	09:42:32
11	Okay. Dr. Abbott, between 2024 and 2025,	09:42:36
12	when you received this letter, were you performing	09:42:39
13	work in this litigation?	09:42:42
14	A. I was asked, when I was first contacted,	09:42:44
15	to create a draft of a report that was slightly	09:42:48
16	different.	09:42:51
17	Q. Okay. And on -- what was the topic of	09:42:52
18	that report?	09:42:57
19	A. It was very similar, but I believe there	09:42:59
20	was a change between the challenge districts,	09:43:02
21	between July -- between when I was originally	09:43:06
22	contacted, July 2024, and when this assignment came	09:43:08
23	in to me.	09:43:12
24	I believe that CD 27 and CD 28 were also	09:43:13
25	considered originally to be challenge districts,	09:43:17

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1	which changed.	09:43:19
2	Q. Okay. And so was that the -- was that the	09:43:25
3	only difference in your assignment given to you in	09:43:30
4	2024 versus February of 2025?	09:43:34
5	A. From what I can recall.	09:43:37
6	Q. Okay. Had your earlier report included	09:43:39
7	the state house districts?	09:43:41
8	A. I don't -- I don't believe so.	09:43:45
9	Q. Okay. It was focused only on	09:43:47
10	congressional?	09:43:49
11	A. I believe so.	09:43:51
12	Q. And so, when you received this letter, had	09:43:53
13	you begun work yet on the report that you ultimately	09:43:57
14	disclosed in this case?	09:44:01
15	A. Not -- not for this report.	09:44:05
16	Q. Okay. And so, your report, in this case,	09:44:09
17	was disclosed in, I believe it was March 20th or	09:44:18
18	21st.	09:44:21
19	So does that mean that you prepared your	09:44:24
20	reporting in about a three-week period?	09:44:26
21	A. That sounds correct, yes.	09:44:30
22	Q. Did you, in preparing your work, rely on	09:44:32
23	the work that you had previously done?	09:44:34
24	ATTORNEY JONES: Object to form.	09:44:40
25	Q. Go ahead.	09:44:43

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1	You may answer.	09:44:44
2	A. I can't -- I can't recall.	09:44:46
3	Q. Okay. So you can't recall whether, for	09:44:47
4	example, you borrowed or incorporated portions of	09:44:53
5	the draft that you had already prepared into the	09:44:55
6	report that you ultimately disclosed?	09:44:57
7	A. I think there was some portions	09:45:01
8	particularly about CD 26, which was the sort of	09:45:02
9	overlap between the two assignments.	09:45:06
10	Q. Okay. Did you receive a letter similar to	09:45:09
11	this containing instructions when you began your	09:45:11
12	work on the initial draft?	09:45:15
13	A. I did not.	09:45:18
14	Q. Okay. Who on -- on the Plaintiffs' legal	09:45:19
15	team did you communicate with regarding your work on	09:45:25
16	this case?	09:45:29
17	A. I -- I communicated with Nick Warren, the	09:45:32
18	ACLU; I communicated with Patrick Jones of	09:45:36
19	O'Melveny; I communicated with Andrea Ojeda of	09:45:40
20	O'Melveny. I can't -- I can't give you first and	09:45:48
21	last names beyond that right now.	09:45:54
22	Q. Okay. And how about experts. Did you	09:45:55
23	have any interaction while performing your work in	09:45:59
24	this case with any experts retained by the	09:46:01
25	plaintiffs?	09:46:04

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1	A. No.	09:46:05
2	Q. Okay. So you didn't speak directly with	09:46:05
3	either Dr. McCartan or Dr. Walker?	09:46:08
4	A. No.	09:46:14
5	Q. Did you talk with anybody else about your	09:46:16
6	work on this case besides the legal team for the	09:46:18
7	plaintiffs?	09:46:24
8	A. No.	09:46:25
9	Q. Okay. No other colleagues or associates	09:46:27
10	or friends or consultants? Nobody like that?	09:46:31
11	A. No.	09:46:36
12	Q. Had you worked before -- before you were	09:46:39
13	engaged on this case, with any of the members of the	09:46:42
14	plaintiffs' legal team?	09:46:46
15	A. I worked on a previous case with Nick	09:46:48
16	Warren.	09:46:50
17	Q. Okay. Tell me about that case.	09:46:51
18	A. The case was another Florida redistricting	09:46:54
19	case that concerned the City of Miami.	09:46:57
20	Q. Okay. Was that the Grace v. City of Miami	09:47:03
21	case?	09:47:08
22	A. Correct.	09:47:09
23	Q. Okay. And we'll talk more about that in a	09:47:10
24	little bit.	09:47:13
25	What experience do you have in	09:47:14

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14

1 redistricting, specifically?

09:47:16

2 A. My academic work has focused on elections,
3 particularly local elections. And I've been an
4 expert witness for the Grace case, and I was an
5 expert consultant for another case, as well.

09:47:20

09:47:24

09:47:28

09:47:31

6 Q. Okay. Is that the Town of Mt. Pleasant
7 case?

09:47:33

09:47:39

8 A. Correct.

09:47:39

9 Q. Let's kind of break down or go into more
10 detail into the academic work.

09:47:40

09:47:42

11 What academic work have you done that's
12 specifically related, not just to elections
13 generally, but to redistricting?

09:47:44

09:47:47

09:47:51

14 A. So I have a number of publications that
15 look at different sorts of electoral systems and how
16 changes to the electoral systems might impact
17 minority representation, in particular, but also
18 substantive policy outcomes -- sort of the
19 translation of votes into policy and into
20 representation.

09:47:54

09:47:56

09:47:59

09:48:02

09:48:06

09:48:12

09:48:15

21 Q. Okay. Do any of those articles concern
22 the -- the drawing of districts or the manner in
23 which districts are drawn?

09:48:18

09:48:20

09:48:23

24 A. There is an article I published in the
25 American Journal of Political Science that looks at

09:48:27

09:48:29

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1	how districts are drawn for school district	09:48:34
2	elections and the impact that it's had on minority	09:48:36
3	representation in California.	09:48:42
4	Q. Okay. And is that -- is that focused	09:48:43
5	on -- on the mechanics of how districts are drawn,	09:48:49
6	or is it just focused on the impact that particular	09:48:53
7	districts have on outcomes, electoral or political	09:48:59
8	outcomes.	09:49:06
9	A. Can you clarify what you mean? The	09:49:07
10	distinction?	09:49:08
11	Q. So I guess I'm thinking about the	09:49:09
12	redistricting process itself in which legislatures	09:49:11
13	redraw district lines and make decisions about where	09:49:16
14	district lines would be placed.	09:49:20
15	Is that what the article is about, or is	09:49:22
16	it just about taking a set of districts and	09:49:24
17	determining their impact?	09:49:26
18	A. It's not -- it's not particularly	09:49:28
19	concerned with where lines are drawn.	09:49:31
20	Q. Okay. Have you ever drawn a redistricting	09:49:33
21	map yourself?	09:49:38
22	A. I have.	09:49:40
23	Q. You have. Okay. Tell me about that.	09:49:41
24	A. It was, you know, for academic reasons,	09:49:44
25	for academic work, not as an expert witness.	09:49:46

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1	Q. Okay. Which jurisdiction were you drawing	09:49:52
2	districts for?	09:49:56
3	A. I've looked at school district maps	09:49:58
4	before; I have looked at a variety of maps; I've	09:50:00
5	looked at maps in New York State. Generally, local,	09:50:07
6	local elections, town council, town boards.	09:50:11
7	Q. Okay. Are you saying that you drew the	09:50:14
8	districts yourself, or that you analyze districts	09:50:16
9	that others were drawing?	09:50:19
10	A. I have drawn districts myself. I've drawn	09:50:22
11	maps myself, but, again, not in a potential	09:50:25
12	capacity.	09:50:28
13	Q. Okay. So is that separate from your	09:50:28
14	academic work? Was that more a personal interest?	09:50:32
15	A. I've used it as background for my academic	09:50:37
16	work and for -- to inform my academic work.	09:50:39
17	Q. Okay. Have you ever worked for a -- a	09:50:42
18	government agency, whether it's a legislature or a	09:50:46
19	court, as a court-appointed expert in redistricting?	09:50:49
20	A. No.	09:50:54
21	Q. Have you ever taught courses on	09:50:58
22	redistricting?	09:50:59
23	A. I have not taught courses on	09:51:01
24	redistricting, but I have taught lectures, I have	09:51:03
25	taught classes on redistricting.	09:51:07

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1	Q. Okay.	09:51:10
2	Okay. Can you describe for me, beginning	09:51:15
3	on February 28th, when you received this instruction	09:51:18
4	or this letter containing instructions from counsel,	09:51:21
5	the process by which you went about preparing your	09:51:25
6	report?	09:51:28
7	A. So once I was given instructions, I	09:51:31
8	started assembling the data sources, and then I	09:51:34
9	started just doing the assignment and looking at	09:51:41
10	patterns of racial concentrations across district	09:51:45
11	lines in order to form my conclusions and the bulk	09:51:52
12	of the report, in order to answer the questions that	09:51:57
13	were asked of me.	09:51:59
14	Q. What -- did you review any -- any	09:52:02
15	documents in preparing your report?	09:52:05
16	A. Other than the data sources I list in my	09:52:08
17	expert report, no.	09:52:11
18	Q. Okay. Did you -- did you review any laws	09:52:13
19	or court decisions such as the Florida Constitution	09:52:19
20	decisions of the Florida Supreme Court?	09:52:23
21	A. No.	09:52:26
22	Q. Did you draft the report yourself?	09:52:30
23	A. Yes.	09:52:33
24	Q. Okay. Did you receive assistance from	09:52:34
25	anyone in drafting your report?	09:52:36

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1	A.	I -- I received feedback and comments on	09:52:39
2		my report from counsel, suggested suggestions.	09:52:47
3	Q.	Okay. But no assistance from anyone else	09:52:54
4		such as, you know, a student assistant or someone	09:52:59
5		like that?	09:53:02
6	A.	No.	09:53:03
7	Q.	Let's talk about your prior expert	09:53:06
8		engagements. You've mentioned the Grace case.	09:53:08
9		Did you testify in the Grace case, whether	09:53:12
10		at deposition or at trial?	09:53:15
11	A.	Both.	09:53:18
12	Q.	Both. Okay.	09:53:19
13		How about the Town of Mt. Pleasant case?	09:53:22
14		Did you testify in that case?	09:53:25
15	A.	I did not.	09:53:27
16	Q.	You did not.	09:53:29
17		What was the nature of your work in the	09:53:31
18		Town of Mt. Pleasant case?	09:53:32
19	A.	I was retained as an expert witness to	09:53:34
20		assess the plaintiffs' claim. I was working for the	09:53:38
21		defendant, the Town of Mt. Pleasant. And I was	09:53:40
22		retained to assess the claim that the current	09:53:45
23		at-large electoral system was preventing the	09:53:47
24		minority, for both Hispanics, from electing their	09:53:52
25		candidate of choice.	09:53:58

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1	Q. Okay. And what kinds of opinions did you	09:53:59
2	render in that case?	09:54:03
3	A. I served as a consultant. I provided	09:54:04
4	advice to -- to counsel. So I did not write any	09:54:06
5	opinions.	09:54:10
6	Q. Okay.	09:54:10
7	Okay. So there's no -- you didn't	09:54:13
8	generate any documents that were filed with the	09:54:16
9	court?	09:54:18
10	A. Correct.	09:54:18
11	Q. Have you been an expert in any other cases	09:54:21
12	besides those two?	09:54:23
13	A. No.	09:54:24
14	Q. Did you follow Florida's redistricting	09:54:33
15	process while it was taking place?	09:54:35
16	A. No.	09:54:37
17	Q. Okay. So your opinions expressed in your	09:54:39
18	report are based on -- would it be fair to say that	09:54:42
19	they're based on an analysis of data that is kind of	09:54:46
20	after the fact, after the redistricting process has	09:54:52
21	taken place?	09:54:56
22	ATTORNEY JONES: Objection to form.	09:54:57
23	Q. Go ahead. Whenever you can -- whenever	09:55:01
24	he -- whenever Mr. Jones objects, unless he	09:55:02
25	specifically says you shouldn't answer, unless he	09:55:05

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1	specifically directs you not to answer, you can go	09:55:08
2	ahead and answer.	09:55:14
3	A. Sorry. Can you repeat the question?	09:55:15
4	Q. Sorry. And I'll try to do a better job of	09:55:17
5	it.	09:55:19
6	So you testified that you didn't follow	09:55:20
7	the redistricting process as it took place. So is	09:55:21
8	it, at least fair to say, that you don't claim to	09:55:24
9	have any personally firsthand knowledge of what	09:55:27
10	motivated the legislators or legislative staff to	09:55:31
11	draw the districts the way that they drew them.	09:55:38
12	A. That's correct.	09:55:40
13	Q. Your analysis is based on maps and data	09:55:40
14	rather than personal knowledge of what was going on	09:55:43
15	during the process; is that fair?	09:55:46
16	A. Yes, that's fair.	09:55:51
17	Q. Have you ever been to Florida?	09:55:53
18	A. Yes.	09:55:54
19	Q. How often have you been to Florida?	09:55:55
20	A. I don't -- I don't know how many times.	09:55:57
21	It's not a regular trip for me. The last time I was	09:55:58
22	there, it was for -- when I testified in the Grace	09:56:02
23	case.	09:56:04
24	Q. Okay. And that would have been maybe a	09:56:05
25	couple years ago?	09:56:08

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1	A. I think it was January 24.	09:56:09
2	Q. Okay. And was that in Miami?	09:56:12
3	A. Yes.	09:56:13
4	Q. Had you been to Miami before that?	09:56:14
5	A. Yes.	09:56:16
6	Q. Okay. How often have you been to Miami,	09:56:17
7	would you say?	09:56:20
8	A. Maybe two or three times.	09:56:22
9	Q. Okay. Are you -- would you say that your	09:56:24
10	personally familiar with Florida's demographics?	09:56:30
11	ATTORNEY JONES: Objection to form.	09:56:38
12	Q. Apart from -- apart from data, just do you	09:56:40
13	have personal familiarity with Florida's	09:56:43
14	demographics?	09:56:46
15	ATTORNEY JONES: Same objection.	09:56:47
16	A. I don't -- I'm not quite sure what you	09:56:48
17	mean by "personal."	09:56:51
18	Q. Is -- is let me -- is your knowledge of	09:56:53
19	Florida's demographics based on data or is it rather	09:56:58
20	than, like, personal knowledge for interaction in	09:57:01
21	Florida?	09:57:04
22	A. It is based on data. Again, I'm not quite	09:57:05
23	sure about personal -- what you mean by "personal."	09:57:08
24	Q. Okay. Yeah, we can move on. That's	09:57:11
25	probably a poorly phrased question.	09:57:13

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1	What is your understanding of what the	09:57:15
2	plaintiffs claim in this case?	09:57:19
3	A. I did not -- I did not receive the -- the	09:57:21
4	complaint, and I did not read the complaint.	09:57:26
5	Q. Okay. Do you have -- do you have some	09:57:29
6	understanding of what their challenge consists of?	09:57:34
7	A. Not -- nothing beyond the instructions I	09:57:39
8	was given by counsel -- from counsel.	09:57:42
9	Q. Okay. Do you understand that the	09:57:44
10	plaintiffs are challenging the validity of	09:57:47
11	Congressional District 26?	09:57:51
12	A. I understand that it is a challenge	09:57:54
13	district, yes.	09:57:55
14	Q. Okay. And do you understand that they're	09:57:56
15	challenging seven statehouse districts?	09:57:58
16	A. I understand that there are challenged	09:58:01
17	statehouse districts, yes.	09:58:05
18	Q. Do you know under what legal theory or	09:58:07
19	what legal claim they are challenging those	09:58:09
20	districts?	09:58:11
21	A. I know that it's a 14th Amendment claim.	09:58:12
22	But beyond that, I am not familiar.	09:58:15
23	Q. Okay. Do you know what redistricting	09:58:17
24	simulations are?	09:58:28
25	A. Yes.	09:58:33

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1	Q. Okay. What are simulations, redistricting	09:58:33
2	simulations?	09:58:36
3	A. Redistricting simulations are basically	09:58:37
4	creating iterations of maps, or bundles of maps,	09:58:40
5	that are drawn based on a number of constraints that	09:58:42
6	a computer sort of generates.	09:58:47
7	Q. And -- and do you know what the purpose of	09:58:49
8	doing that is?	09:58:52
9	ATTORNEY JONES: Objection to form.	09:58:56
10	A. I think there could be several purposes.	09:58:58
11	Q. Okay. What -- why would -- why would	09:59:01
12	somebody run redistricting simulations?	09:59:07
13	A. They could be doing it for academic	09:59:11
14	reasons. They could doing it for expert witness	09:59:14
15	reasons.	09:59:18
16	Q. Mm-hmm.	09:59:18
17	A. Generate a series of options from maps.	09:59:21
18	Q. And is -- are redistricting simulations	09:59:24
19	run in order to identify the range of potential	09:59:27
20	outcomes under specific constraints in	09:59:30
21	redistricting?	09:59:34
22	A. They -- they may be, often.	09:59:37
23	Q. Okay. Do you know how -- when	09:59:42
24	redistricting simulations are run, do you know how	09:59:44
25	many maps are generated in that process?	09:59:47

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1	A.	I think that's up to the person who runs	09:59:50
2		the simulations.	09:59:52
3	Q.	Okay. Do you know what would be -- what	09:59:55
4		would be typical?	09:59:59
5		ATTORNEY JONES: Objection to form.	10:00:01
6	A.	No.	10:00:03
7	Q.	Is it maybe -- is it more like two or	10:00:04
8		three, or is it more like 5,000?	10:00:06
9		ATTORNEY JONES: Objection to form.	10:00:10
10	A.	It's not -- I don't know the answer to	10:00:11
11		that.	10:00:13
12	Q.	Okay. Fair enough.	10:00:13
13		The specific analyses that you conducted	10:00:21
14		in your report, were you -- did you select those	10:00:23
15		analyses to perform, or did counsel ask you to	10:00:29
16		perform those specific analyses?	10:00:35
17		How did the -- how did you decide which	10:00:38
18		analyses to conduct?	10:00:40
19		ATTORNEY JONES: Objection to form.	10:00:42
20		And I'll just caution the witness to not	10:00:43
21		reveal the contents of any communications with	10:00:46
22		counsel.	10:00:48
23		You can talk about assumptions we asked	10:00:49
24		you to take and instructions that we gave you	10:00:52
25		but not specific communications.	10:00:56

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1	A. I was responsible for all the analyses	10:01:00
2	that were conducted in deciding which analyses to	10:01:02
3	do, and they were chosen in order to address the	10:01:05
4	assignment that I was given by counsel.	10:01:10
5	Q. Did you receive any other instructions	10:01:14
6	from counsel besides what is memorialized in this	10:01:17
7	letter?	10:01:20
8	A. No.	10:01:22
9	Q. Okay. All right. We will stop sharing	10:01:23
10	this screen.	10:01:25
11	ATTORNEY JONES: And, Andy, I don't know	10:01:28
12	if this is a technical issue on my end, but I	10:01:30
13	was never -- I'm still not able to see that	10:01:32
14	document in the chat. It looks like it may	10:01:34
15	have popped up --	10:01:38
16	THE WITNESS: Yeah, I got it.	10:01:39
17	ATTORNEY JONES: -- on Carolyn's screen --	10:01:42
18	so.	10:01:44
19	THE WITNESS: It could have been a direct	10:01:46
20	message.	10:01:47
21	ATTORNEY JONES: Maybe we can handle this	10:01:48
22	off the record with Stanley.	10:01:50
23	ATTORNEY JACKSON: It's not on my screen	10:01:51
24	either.	10:01:51
25	THE COURT REPORTER: Sorry, who just said	10:01:51

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1	that? It did not highlight in time.	10:01:51
2	ATTORNEY JACKSON: Sorry, this is	10:02:03
3	Gabrielle Jackson, one of the attorneys for the	10:02:03
4	plaintiffs.	10:02:08
5	THE WITNESS: Yeah, I see the letter on my	10:02:15
6	chat, so I wonder if Andy might have sent it	10:02:17
7	directly.	10:02:20
8	ATTORNEY JACKSON: I see the letter in the	10:02:34
9	chat, as well.	10:02:36
10	ATTORNEY BARDOS: I'm not sure what to do	10:02:36
11	about that.	10:02:36
12	ATTORNEY JONES: Do you want to send them	10:02:38
13	to me, or I can just email them?	10:02:39
14	ATTORNEY BARDOS: Yeah, let's -- if it's	10:02:41
15	okay with everyone, let's keep going for now,	10:02:42
16	and maybe at a break, I will just send the	10:02:46
17	exhibits maybe to Carmen, and she can be in	10:02:49
18	charge of that.	10:02:51
19	If that's okay with you, Carmen.	10:02:53
20	ATTORNEY CARTAYA: Yes.	10:02:56
21	Q. So, Dr. Abbott, I would like to begin	10:02:58
22	talking about your bottom line conclusions in this	10:03:02
23	case, and I've seen them formulated in different	10:03:04
24	ways or maybe they're different opinions in your	10:03:06
25	report, but I just want to understand that I	10:03:09

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1 understand what your conclusions are.

10:03:10

2 In your rebuttal in paragraph 7, you say
3 that you never concluded in your initial report
4 whether race did or did not predominate.

10:03:13

10:03:15

10:03:19

5 So is it accurate to say that you are not
6 rendering an opinion on whether race predominated in
7 the drawing of the challenge districts?

10:03:24

10:03:26

10:03:31

8 A. I'm stating that my report never concluded
9 that. My report -- my report's conclusions are
10 consistent with the idea that race may have
11 predominated, but I never used that term.

10:03:35

10:03:37

10:03:41

10:03:44

12 I was not asked if race predominated.

10:03:47

13 It's a question that I do not feel comfortable
14 concluding, given that it's a -- it seems like more
15 of a legal distinction. So I believe my evidence is
16 consistent with that conclusion but that's not a
17 conclusion for me, as the legal expert witness, to
18 make.

10:03:51

10:03:54

10:03:57

10:04:02

10:04:04

10:04:06

19 Q. Okay. So that is, just to be clear, you
20 are not offering, in this case, as an expert
21 witness, the opinion that race predominated in the
22 drawing of the challenge districts?

10:04:07

10:04:11

10:04:14

10:04:18

23 A. I am not concluding that from my evidence.
24 My evidence is consistent with that conclusion.

10:04:22

10:04:24

25 Q. Okay. And what does it mean to be

10:04:28

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1	consistent with a conclusion?	10:04:31
2	A. It means that it is one possible	10:04:34
3	conclusion, one possible outcome from my evidence,	10:04:39
4	but it is not the only possible outcome.	10:04:44
5	Q. Okay. So is it accurate to say, then,	10:04:47
6	that when you say that your report is consistent	10:04:58
7	with the idea of predominance, that means that it	10:05:02
8	can't be ruled out based on your report?	10:05:07
9	ATTORNEY JONES: Objection to form.	10:05:10
10	A. I think that's correct.	10:05:12
11	Q. Okay. But it also means that your report	10:05:13
12	and your analyses do not compel the conclusion that	10:05:19
13	race predominated?	10:05:22
14	A. I believe that's also correct as someone	10:05:26
15	who is not responsible for making that legal	10:05:28
16	distinction.	10:05:31
17	Q. Okay. You also say -- and this is in	10:05:33
18	paragraph 10 of your rebuttal report that race was a	10:05:38
19	factor in drawing the enacted map.	10:05:43
20	So is it your opinion that race was a	10:05:46
21	factor in drawing the challenge districts?	10:05:48
22	A. Can I check my rebuttal report in front of	10:05:52
23	me?	10:05:54
24	Q. Yes, it's in paragraph 10.	10:05:56
25	A. You said paragraph 10?	10:06:05

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1	Q. Correct.	10:06:08
2	A. Yeah. So I say in my rebuttal report that	10:06:11
3	the -- my analysis strongly suggests that race was a	10:06:14
4	factor.	10:06:24
5	Q. Okay. And is that -- and so you were not	10:06:25
6	rendering the opinion that race was, in fact, a	10:06:29
7	factor, but rather that the evidence strongly	10:06:33
8	suggests that it was?	10:06:36
9	A. Correct.	10:06:37
10	Q. Okay. Do you have an opinion about	10:06:38
11	whether race should be considered in drawing	10:06:44
12	districts?	10:06:47
13	A. No.	10:06:47
14	Q. Okay. So you don't have an opinion,	10:06:48
15	personally or within this case, whether legislatures	10:06:50
16	should take into account where minority voters live	10:06:59
17	when they draw districts?	10:07:03
18	A. I do not have a professional expert	10:07:06
19	opinion.	10:07:08
20	Q. Okay. In paragraph 51 of your rebuttal	10:07:09
21	report, you say.	10:07:15
22	"The choices" --	10:07:20
23	And I'll give you a moment to find it.	10:07:22
24	A. Yup.	10:07:25
25	Q. You say:	10:07:26

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1	"The choices made in the drawing of the	10:07:27
2	enacted map were not racially neutral, but	10:07:29
3	instead, were made in a manner so	10:07:33
4	consistent that they cannot be explained	10:07:36
5	by random choice."	10:07:38
6	Do you see that?	10:07:41
7	A. Yes.	10:07:42
8	Q. Okay. And what do you mean by "racially	10:07:42
9	neutral"?	10:07:44
10	A. I mean by "racially neutral," that the	10:07:56
11	decisions were made without any regard to race.	10:07:59
12	Q. Okay. And so when you say that, "The	10:08:02
13	choices made in the drawing of the enacted map were	10:08:05
14	not racially neutral," are you saying that the	10:08:08
15	choices were made with regard to race?	10:08:13
16	A. I'm saying that the map was drawn in such	10:08:16
17	a way that race was taken into consideration.	10:08:18
18	Q. Okay. And now that seems to be saying a	10:08:20
19	little more than that your evidence strongly	10:08:23
20	suggests that race was a factor.	10:08:26
21	So are you saying that race was taken into	10:08:28
22	consideration and was a factor or simply that your	10:08:30
23	analysis strongly suggests that it was?	10:08:37
24	A. We talked before about how my evidence	10:08:39
25	strongly -- my evidence suggests that race was a	10:08:43

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1 predominant factor, versus it being a predominant 10:08:46
2 factor. 10:08:49

3 Now we're talking about whether race was a 10:08:49
4 factor at all. 10:08:51

5 Q. Okay. So let's -- let's go back a little 10:08:52
6 bit. 10:08:55

7 So are you saying now that, with respect 10:08:56
8 to predominance -- so I thought -- I thought you 10:08:58
9 were saying before, that predominance is a 10:09:03
10 possibility and that it can't be ruled out. 10:09:07

11 Are you saying now that your evidence, or 10:09:10
12 your analysis, suggests that race was, in fact, the 10:09:12
13 predominant factor? 10:09:16

14 A. I'm saying that my evidence is consistent 10:09:17
15 with that claim. 10:09:20

16 Q. Okay. So not necessarily that it suggests 10:09:21
17 that it was. 10:09:23

18 A. It's very difficult, from observational 10:09:26
19 data, to make causal claims. So what we have here 10:09:29
20 is a series of correlational claims and 10:09:33
21 circumstantial evidence. 10:09:38

22 Q. Okay. And you would agree that 10:09:40
23 correlation does not prove causation? 10:09:41

24 A. Correct. 10:09:47

25 Q. And then I believe when we were talking 10:09:49

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1 about whether race was a factor, and we looked at 10:09:50
2 paragraph 10, and where you had written that your 10:09:57
3 evidence strongly suggests that race was a factor, 10:09:59
4 I'm trying to square that now with what you say in 10:10:03
5 paragraph 51, where you say that: 10:10:07

6 "The choices made and the drawing of the 10:10:09
7 enacted map were not racially neutral." 10:10:12

8 So are you asserting, as an opinion in 10:10:15
9 this case, that the maps were drawn in a manner that 10:10:21
10 is-- or that the decisions that were made were not 10:10:23
11 racially neutral? 10:10:27

12 A. My quantitative and statistical evidence 10:10:30
13 suggests that the map was not drawn in a racially 10:10:32
14 neutral way. That there were decisions that were 10:10:36
15 made that cannot be attributed to random chance or 10:10:39
16 mistakes. And that race would have had to have 10:10:42
17 factored in in some way. 10:10:47

18 Q. Okay. And we talked about, when we were 10:10:48
19 talking about predominance, that -- that your 10:10:52
20 conclusion is consistent with predominance but 10:10:56
21 doesn't necessarily compel the conclusion that race 10:10:58
22 predominated. 10:11:01

23 Is the same true of your opinion that race 10:11:03
24 was a factor? Is that -- are you saying that your 10:11:05
25 opinions are consistent with the idea that race was 10:11:09

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1 a factor and that -- and that can't be ruled out, or 10:11:12
2 are you saying that your evidence compels the 10:11:21
3 conclusion or suggests the conclusion that race was 10:11:23
4 a factor? 10:11:25

5 A. My evidence suggests that race was a 10:11:26
6 factor, and the statistical likelihood that it was 10:11:29
7 not is extremely low. 10:11:30

8 Q. Okay. Then in paragraph 5 of your initial 10:11:32
9 report, you say, you say that you -- 10:11:39

10 "...have been asked by Plaintiffs' 10:11:53
11 counsel, in this case, to examine whether 10:11:57
12 and the extent to which race explains the 10:12:00
13 shape and boundaries of challenge 10:12:00
14 districts." 10:12:04

15 Did you conclude, in this case, that race 10:12:07
16 explains the shape and boundaries of the challenge 10:12:09
17 districts? 10:12:11

18 A. I concluded that race was a likely 10:12:12
19 explanation, at least one explanation, for the shape 10:12:14
20 and boundaries. 10:12:16

21 Q. Okay. So does your -- is your analysis -- 10:12:19
22 let me start over. 10:12:24

23 So you did not conclude that race was the 10:12:25
24 sole explanation for the shape and boundaries of the 10:12:29
25 districts? 10:12:32

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1	A. Correct.	10:12:33
2	Q. Okay. And would you agree that there	10:12:33
3	could be multiple explanations for the shape and	10:12:36
4	boundaries of a particular district?	10:12:40
5	ATTORNEY JONES: Objection to form.	10:12:45
6	A. I would say that there may very well be	10:12:48
7	other explanations, in addition to race. But,	10:12:51
8	again, my evidence and my analysis suggests that	10:12:55
9	race was an important factor.	10:13:00
10	Q. Okay. And so -- so just to be clear,	10:13:01
11	you're not asserting that race was the sole factor	10:13:05
12	that the legislature considered in drawing the	10:13:13
13	challenge districts?	10:13:16
14	A. I cannot conclude that from my data and my	10:13:18
15	analysis.	10:13:21
16	Q. Okay. Now, you had mentioned important	10:13:22
17	factor. So let me -- let me ask to you take a look	10:13:26
18	at paragraph 9 of your initial report. And in	10:13:31
19	paragraph 9, you say:	10:13:38
20	"Florida's 2020 congressional and state	10:13:41
21	house maps are consistent with the idea	10:13:43
22	that race played a significant role in	10:13:45
23	shaping the state legislature's	10:13:47
24	redistricting decisions in drawing these	10:13:49
25	study districts."	10:13:52

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1 So I guess my first question is, since you've
2 already said that you're not rendering an opinion
3 on whether race predominated, I assume that when
4 you say "significant role," you mean something
5 other than that race predominated.

6 A. "Predominated" and "significant," I don't
7 know that there's a legal distinction or what the
8 legal definition is because I'm not retained for
9 that role or for that job. But, again, my language
10 does not say that race played a significant role; it
11 says that my analysis and my evidence is consistent
12 with the idea that it played a significant role.

13 Q. Fair enough. In your mind, though, is
14 "significant" and "predominant," are those synonyms,
15 or do you see a difference between those two terms?

16 A. I think there is a casual difference, but
17 legally, I don't know.

18 Q. Okay. But what is -- apart from legally,
19 I understand that you're not opining on that, but
20 what is the difference that you see between
21 "significant" and "predominant"?

22 A. "Significant," suggests to me that the
23 role was a factor, and an important factor, and
24 without it, the districts would look very different.

25 But "predominant" implies to me that it's

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1	the most important or the only important -- the only	10:15:17
2	factor in the drawing of the districts.	10:15:21
3	Q. Okay. And did you, in your reports,	10:15:22
4	review the extent to which other factors, for	10:15:31
5	example, compactness or other nonracial factors,	10:15:34
6	might have influenced drawing of the districts?	10:15:38
7	A. I did not.	10:15:42
8	Q. Okay. And you were not asked to review	10:15:44
9	those nonracial factors?	10:15:46
10	A. Correct.	10:15:49
11	Q. And so you wouldn't be able to opine,	10:15:53
12	then, on the relative weight or importance of racial	10:15:56
13	versus nonracial factors in drawing the districts?	10:16:01
14	A. I could not.	10:16:06
15	Q. Okay. When you use the term "significant	10:16:08
16	role," how do you measure or determine significance?	10:16:18
17	A. Again, this was not part of the analysis.	10:16:27
18	This was a conclusion that was drawn from the	10:16:32
19	evidence and from the data that I had. It was not	10:16:37
20	defined in any -- in any real terms.	10:16:41
21	Q. Okay. And so when you say -- when you say	10:16:45
22	that your analysis is consistent with the idea that	10:16:49
23	race plays a significant role, what do you mean by	10:16:53
24	"significant role"?	10:16:58
25	A. A role that mattered, a role that had an	10:17:00

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1	impact on what the map looked like and on the	10:17:03
2	outcomes.	10:17:05
3	Q. Okay. All right.	10:17:06
4	And you've mentioned, or I think you	10:17:10
5	alluded to this, but let me just confirm: You're	10:17:12
6	not rendering an opinion on -- on any legal	10:17:14
7	conclusions in this case, correct?	10:17:19
8	A. That is correct.	10:17:21
9	Q. Okay. And are you a lawyer?	10:17:21
10	A. I am not.	10:17:24
11	Q. Okay.	10:17:25
12	Okay. Let's begin with the substance of	10:17:54
13	your analysis. Now, if you could turn to page --	10:17:57
14	I'm sorry, paragraph 17 in your expert report.	10:18:02
15	ATTORNEY BARDOS: And I will -- and I will	10:18:13
16	try to send this through the chat. I'm not	10:18:15
17	making any promises, but I will try to	10:18:17
18	circulate this to everyone.	10:18:19
19	THE WITNESS: Yes.	10:18:20
20	ATTORNEY CARTAYA: Yes.	10:18:30
21	ATTORNEY BARDOS: So hopefully everyone	10:18:31
22	has that. There it is.	10:18:32
23	Q. So let's begin with paragraph 17.	10:18:36
24	ATTORNEY JONES: Just for the record, I'm	10:18:40
25	still not --	10:18:41

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1	ATTORNEY BARDOS: You don't see it,	10:18:42
2	Patrick?	10:18:43
3	ATTORNEY JACKSON: I don't see have it	10:18:46
4	either. Is there another group or thread going	10:18:48
5	on?	10:18:50
6	ATTORNEY CARTAYA: Are you guys looking at	10:18:58
7	the chat function? I can email it to you.	10:18:59
8	ATTORNEY BARDOS: And so who needs it?	10:19:16
9	Patrick?	10:19:18
10	Andrea, you have it?	10:19:18
11	ATTORNEY OJEDA: I have it.	10:19:21
12	ATTORNEY BARDOS: Who else?	10:19:24
13	ATTORNEY JACKSON: I need it.	10:19:28
14	ATTORNEY BARDOS: Okay.	10:19:31
15	Q. Okay. So paragraph 17, and this is the	10:19:32
16	paragraph in which you -- you mention that -- and	10:19:35
17	we're talking about the congressional map here. So	10:19:41
18	we begin talking about the congressional map. And	10:19:43
19	you say that the Hispanic voting-age population of	10:19:46
20	the -- of District 26, and its seven bordering	10:19:50
21	districts, is 45.6 percent. And then you have a	10:19:57
22	table showing the Hispanic voting-age population of	10:20:00
23	each of those eight congressional districts.	10:20:04
24	What conclusions or inferences do you draw	10:20:08
25	from the information presented in that paragraph,	10:20:11

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1	including the Table 1?	10:20:13
2	A. So as I say in the paragraph, the	10:20:17
3	protected districts, 26, 27, 28, have Hispanic VAP	10:20:22
4	that is far above -- far above the overall regional	10:20:28
5	Hispanic VAP, and then there are districts,	10:20:37
6	particularly 18, 19, 20, and 24, that have Hispanic	10:20:38
7	VAP that's far below the regional average, and that	10:20:45
8	District 25 is really the only one that comes close	10:20:48
9	to the average for the region.	10:20:52
10	Q. Okay. And are you drawing inferences from	10:20:54
11	that, or are you simply presenting data?	10:20:56
12	A. I'm primarily presenting data there, but	10:20:59
13	also concluding that there's a large gap between the	10:21:03
14	average regional Hispanic VAP and the individual	10:21:08
15	districts.	10:21:11
16	Q. Okay. And are you suggesting that if race	10:21:12
17	were not considered, we wouldn't see such a gap?	10:21:14
18	A. I'm not suggesting that in this paragraph,	10:21:25
19	no.	10:21:27
20	Q. Okay. So you are not attributing that	10:21:27
21	fact to race as opposed to anything else?	10:21:31
22	A. Not that fact by itself. Not in	10:21:33
23	isolation.	10:21:35
24	Q. Okay. And you would agree that -- or let	10:21:35
25	me ask this: Did you assess the Hispanic voting-age	10:21:37

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1	population of the different counties that make up	10:21:41
2	those eight districts?	10:21:43
3	A. Further on in my report, I have a county	10:21:44
4	analysis.	10:21:44
5	Q. Okay. And do you recall what the HVAP is	10:21:54
6	for Miami-Dade County?	10:21:57
7	A. Not off the top of my head, no.	10:22:00
8	Q. Okay. Does 69.8 percent sound about	10:22:02
9	right?	10:22:06
10	A. Yeah, sounds about right.	10:22:07
11	Q. And do you know whether any of the other	10:22:09
12	counties that comprised those eight districts comes	10:22:11
13	close to 69 percent HVAP?	10:22:13
14	ATTORNEY JONES: Objection to form.	10:22:18
15	A. I can't tell you off the top of my head.	10:22:20
16	Q. Okay. And so -- all right.	10:22:22
17	Is it -- I mean, are you putting -- I	10:22:28
18	guess I just want to know, are you suggesting that	10:22:39
19	this disparity in HVAPS between the congressional	10:22:42
20	districts is somehow pertinent or meaningful to your	10:22:49
21	analysis?	10:22:52
22	A. I'm saying that, in combination with the	10:22:53
23	fact that the protected districts, which on average	10:22:54
24	have much higher HVAP than the rest of the region,	10:22:58
25	in combination with that fact, that they have very	10:23:04

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1	low spread of the protected districts of HVAP,	10:23:06
2	suggests that they were drawn in a way to accomplish	10:23:08
3	that purpose.	10:23:12
4	Q. Okay. Do you think it's unusual that	10:23:13
5	districts that are predominantly based in Miami-Dade	10:23:17
6	would have higher HVAP versus districts that are not	10:23:20
7	primarily based in Miami-Dade?	10:23:24
8	ATTORNEY JONES: Objection to form.	10:23:29
9	A. I don't know that is particularly	10:23:30
10	surprising, but that is a decision that the	10:23:31
11	mapmakers made.	10:23:33
12	Q. Right. Well, not necessarily. I mean,	10:23:35
13	you know that there have to be some districts that	10:23:37
14	are based primarily in Miami-Dade, correct?	10:23:39
15	A. Based on the demography and the geography	10:23:44
16	of South Florida, there are some districts that have	10:23:48
17	to be made up primarily of Miami-Dade, correct.	10:23:53
18	Q. And do you know what the HVAP is of	10:23:58
19	neighboring Collier County?	10:24:00
20	A. Not off the top of my head.	10:24:03
21	Q. Or Lee County or Monroe County?	10:24:04
22	A. Not off the top of my head.	10:24:11
23	Q. Okay. Or Glades or Highlands or Polk	10:24:12
24	counties?	10:24:16
25	A. I don't know the specific HVAPs of those	10:24:17

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1	counties off the top of my head.	10:24:20
2	Q. Okay. And I believe in your rebuttal	10:24:22
3	report, paragraph -- let's turn to paragraph 24.	10:24:25
4	ATTORNEY JONES: So used to unmuting	10:24:39
5	myself on Zoom, so I just keep doing it.	10:24:41
6	I don't know if this has been marked out	10:24:44
7	as an exhibit.	10:24:45
8	ATTORNEY BARDOS: It has not yet. I can	10:24:47
9	enter it into the chat, and then trust Carmen	10:24:50
10	to do the rest.	10:24:53
11	ATTORNEY CARTAYA: I've already sent you	10:24:56
12	the other emails.	10:24:57
13	ATTORNEY BARDOS: Okay. I'm uploading the	10:25:01
14	rebuttal reporting right now. Okay.	10:25:02
15	Q. So do you see paragraph 24?	10:25:07
16	A. I do.	10:25:09
17	Q. And you say in paragraph 24:	10:25:09
18	"I do not opine that a mapmaker could or	10:25:12
19	should attempt to achieve a uniform	10:25:13
20	Hispanic distribution in the region	10:25:13
21	overall."	10:25:15
22	Did you see that?	10:25:17
23	A. I do.	10:25:18
24	Q. And is that an accurate statement of your	10:25:18
25	views?	10:25:20

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1	A. Yes.	10:25:22
2	Q. Okay. Now, this district that you've	10:25:23
3	defined here of eight districts, would you agree	10:25:27
4	that eight out of 28 districts is nearly 30 percent	10:25:31
5	of Florida's congressional districts?	10:25:36
6	A. Eight out of 28 is nearly 30 percent; that	10:25:41
7	sounds right.	10:25:44
8	Q. So that's a fairly large area of the	10:25:47
9	state, 30 percent.	10:25:50
10	A. I don't -- I don't have an opinion about	10:25:55
11	whether that's large or not.	10:25:57
12	Q. Okay. And so, you would agree that --	10:25:59
13	that those eight districts wouldn't necessarily have	10:26:02
14	the same or even a similar HVAP, correct?	10:26:05
15	A. That's correct.	10:26:11
16	Q. And the HVAP really depends on the	10:26:13
17	differences in the distribution of Hispanic	10:26:18
18	voting-age population across those eight districts,	10:26:23
19	correct?	10:26:26
20	A. The map can be drawn in any way.	10:26:29
21	Q. Okay. And there's no reason, in fact, to	10:26:32
22	expect that a district drawn in Lee County, for	10:26:35
23	example, would have the same HVAP as a district	10:26:39
24	drawn in Miami-Dade County, correct?	10:26:42
25	A. That's correct, but, again, the lines were	10:26:45

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1	a choice. I mean, they were not -- they did not	10:26:50
2	follow county lines.	10:26:53
3	Q. Do you know whether it would be possible	10:26:56
4	to draw eight districts in South Florida with	10:26:57
5	similar HVAPs?	10:27:03
6	A. Can you -- can you ask the question again?	10:27:06
7	Q. Do you think it would be possible to draw	10:27:08
8	these eight districts in South Florida in a manner	10:27:12
9	that results in similar HVAPs across the eight	10:27:14
10	districts?	10:27:18
11	A. I don't know. I didn't do it.	10:27:19
12	Q. Okay. Do you know whether Dr. McCartan's	10:27:21
13	maps also display a -- a divergence or a	10:27:26
14	dissimilarity of HVAPs across these eight districts?	10:27:32
15	A. There are some dissimilarities across the	10:27:35
16	districts. There's a different distribution of	10:27:39
17	those HVAPs.	10:27:41
18	Q. And I believe you wrote in your report,	10:27:42
19	when you were talking about regional variations in	10:28:06
20	HVAP within Miami-Dade County, that because of those	10:28:12
21	variations, you were surprised to see the three	10:28:17
22	congressional districts that are challenged in this	10:28:20
23	case had similar HVAPs; is that accurate?	10:28:21
24	A. I don't know if I specifically referenced	10:28:26
25	Miami-Dade County in my claim.	10:28:29

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1	Q. Okay. All right. We'll get there and	10:28:32
2	look at that.	10:28:36
3	Let's move to paragraph 18. And this is	10:28:36
4	where you talk about the HVAP of the three -- well,	10:28:38
5	you call them three protected districts, districts	10:28:45
6	26, 27, and 28, and you opine that those HVAPs are	10:28:48
7	remarkably uniform; is that correct?	10:28:55
8	A. That is correct.	10:28:58
9	Q. And I don't -- you're not opining, or are	10:29:00
10	you, that the result, the outcome, the fact that we	10:29:05
11	have three districts with similar HVAPs necessarily	10:29:09
12	proves an intent to produce that result; are you?	10:29:14
13	ATTORNEY JONES: Objection to form.	10:29:20
14	A. I'm not making any claim about -- about	10:29:23
15	whether there was an intent or not an intent. It's	10:29:26
16	a subjective mindset of the mapmakers.	10:29:29
17	Q. Okay. Are you -- are you claiming that	10:29:33
18	the mere fact that those HVAPs are similar to each	10:29:35
19	other, by itself, suggests that race was a factor in	10:29:38
20	drawing those three districts?	10:29:44
21	A. I'm saying it is very surprising how	10:29:48
22	similar those districts look on HVAP, considering	10:29:51
23	the overall demography of the region in which they	10:29:55
24	are drawn.	10:29:58
25	Q. Okay. And tell me why it's surprising.	10:29:59

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1	A.	It's surprising because there's a great	10:30:05
2		deal of demographic variation in this area, and so	10:30:08
3		if there's a great deal of demographic variation,	10:30:13
4		you'd expect there to be a fairly -- a fair amount	10:30:15
5		of variation in the composition of these districts.	10:30:19
6	Q.	Okay. Would you -- why wouldn't you	10:30:24
7		expect that if there is variation in HVAP across	10:30:30
8		this region, that in a district as large as a	10:30:35
9		congressional district, those differences might	10:30:39
10		balance each other out within the district?	10:30:43
11	ATTORNEY JONES:	Objection to form.	10:30:47
12	A.	Can -- I'm not sure what you're asking.	10:30:49
13		Could you ask the question again?	10:30:52
14	Q.	Sure. So let's say you have one	10:30:54
15		congressional district that has some population with	10:30:56
16		90 percent HVAP and some population with a	10:30:58
17		50 percent HVAP, and then in the next district over,	10:31:02
18		you have, likewise, 90 percent in some areas, and	10:31:04
19		50 percent in others. Well, those two districts	10:31:08
20		might come out at the same HVAP overall, correct,	10:31:11
21		because those differences might offset each other	10:31:15
22		within each district.	10:31:18
23		Is that not -- why would that not be a	10:31:20
24		reasonable assumption or expectation?	10:31:22
25	A.	They would have to be drawn in that way in	10:31:26

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1 order for them to be composed that way. 10:31:29

2 Q. Assume a race -- a race-blind draw. 10:31:34

3 Assume that you have a mapmaker who's not 10:31:37

4 considering race, why would it not be a reasonable 10:31:39

5 expectation that differences or variations, 10:31:44

6 regional, of HVAP would, within each district, 10:31:49

7 offset each other and result in similar HVAPs in 10:31:56

8 each of the three districts? 10:31:59

9 A. So that's -- it's a question of how 10:32:01

10 they're drawn. 10:32:03

11 So I'll give you an example: If you have 10:32:03

12 a population, and you take five draws of the 10:32:07

13 population based on race or the color of the shirt 10:32:11

14 they're wearing, whatever it is, and every single 10:32:15

15 time, you get that -- those five draws are Hispanic 10:32:17

16 individuals or they're wearing the color blue, and 10:32:23

17 you do it over and over and over again, and you keep 10:32:25

18 getting five blue shirts or five Hispanic people, 10:32:28

19 you would presume the most likely way that the 10:32:31

20 population looks is that everyone was wearing blue 10:32:35

21 or everyone is Hispanic. 10:32:39

22 It would be very unlikely that you just 10:32:42

23 happen to keep drawing the same five, 10:32:44

24 identical-looking individuals if the population 10:32:46

25 actually is quite variable. It's called the Central 10:32:52

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1	Limit Theorem.	10:32:55
2	But, of course, we only having one drawing	10:32:57
3	of the enacted map, so you have to make inferences	10:33:01
4	about the most likely outcome.	10:33:04
5	Q. Right. Let's say you have -- in	10:33:08
6	Miami-Dade, let's say you have -- on each street,	10:33:14
7	you have 90 percent HVAP on one street, 50 percent	10:33:17
8	HVAP on the next street, and it just keeps on going,	10:33:21
9	"90, 50, 90, 50 across the entire region. If that	10:33:24
10	were the distribution of population, in that case,	10:33:31
11	wouldn't you expect that the three districts have	10:33:33
12	approximately the same HVAP?	10:33:35
13	A. But that's not what we see on this map.	10:33:37
14	Q. Okay. But I'm asking a hypothetical:	10:33:39
15	Wouldn't that be the case?	10:33:41
16	A. Sorry -- would not -- would what not be	10:33:45
17	the case?	10:33:48
18	Q. So let's say there's a distribution, so	10:33:50
19	that on one street, you have 90 percent HVAP, the	10:33:52
20	next street over, you have 50 percent HVAP, and it	10:33:57
21	continues that way through the entire region: 90,	10:34:00
22	50, 90, is 50, consistently throughout the entire	10:34:05
23	region, you see those same variations, and you draw	10:34:09
24	three congressional districts, wouldn't you expect	10:34:09
25	those three congressional districts to have similar	10:34:12

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1	HVAPs?	10:34:15
2	A. You could, depending upon the way that it	10:34:16
3	was drawn. But that -- having consistent 90-50	10:34:17
4	alternations in HVAP is actually a consistent	10:34:25
5	demography. That's not the sort of demography we	10:34:30
6	see in Southern Florida. We see variation. We	10:34:32
7	don't see the 90-50, which on a more granular level,	10:34:35
8	would even out to be 70 percent, right?	10:34:39
9	Q. Mm-hmm. And so there are at least some	10:34:44
10	circumstances where variations across the region	10:34:45
11	could offset each other and result in similar HVAPs	10:34:50
12	in each of the districts.	10:34:55
13	A. I wouldn't call what you just described as	10:34:57
14	variation.	10:34:59
15	Q. Okay. You wouldn't call going from 90 to	10:35:02
16	50, to 90 to 50 as variation?	10:35:05
17	A. From one block to the next?	10:35:08
18	Q. Sure.	10:35:10
19	A. Not -- not at the sort of granular level	10:35:14
20	that we're looking at, no.	10:35:17
21	If that's -- if it's consistent where one	10:35:19
22	block is 90 percent and one block is 50 percent	10:35:22
23	throughout the entire region, I would say that's a	10:35:25
24	pretty non-variable distribution. That's a pretty	10:35:27
25	consistent or uniform distribution.	10:35:30

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1	Q.	So what did you do to determine that the	10:35:31
2		variations across this region would not balance out	10:35:36
3		in the drawing of congressional districts?	10:35:41
4	A.	This was just a sort of top-down holistic	10:35:45
5		look at the region. And if you look at Figure 1 in	10:35:49
6		my initial report, you can see that there is a lot	10:35:52
7		of difference in HVAP percentages across this --	10:35:56
8		this -- these three districts that were drawn on the	10:36:02
9		enacted map, 26, 27, and 28.	10:36:05
10	Q.	Okay. So you didn't do anything other	10:36:10
11		than look at the map and the data that's expressed	10:36:12
12		on the map to determine that, in drawing	10:36:15
13		congressional districts, the regional variations in	10:36:18
14		HVAP wouldn't balance out or offset each other?	10:36:23
15	A.	At the regional level, yes, that's	10:36:28
16		correct.	10:36:30
17	Q.	Okay. How do you explain Dr. McCartan's	10:36:30
18		map B2, which has similar HVAPs in districts 26, 27,	10:36:35
19		and 28 to the enacted map?	10:36:40
20	ATTORNEY JONES:	Objection to form.	10:36:45
21	A.	I don't know what you mean by how do I	10:36:45
22		explain it.	10:36:47
23	Q.	So you're aware that Mr. McCartan's map B2	10:36:48
24		has a similar distribution of HVAPs across districts	10:36:52
25		26, 27, and 28 as the enacted map, correct?	10:36:56

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1	A. Correct.	10:37:00
2	Q. Okay. And so if he was drawing race blind	10:37:01
3	and achieved that distribution, then why does the	10:37:07
4	legislature's map, which achieves the same	10:37:11
5	distribution, suggest that race was considered?	10:37:15
6	A. So I don't opine on -- on which of	10:37:21
7	Dr. McCartan's maps are preferable or which are	10:37:26
8	ideal. All I say is that, compared to most of his	10:37:31
9	maps, there is less suspicion of racial motivation	10:37:36
10	compared to the map.	10:37:43
11	Q. Okay. And I'm not asking you to compare	10:37:45
12	his maps or evaluate them against each other, but he	10:37:47
13	did draw a map purportedly race blind that produced	10:37:49
14	very similar HVAPs in districts 26, 27, and 28 to	10:37:55
15	the enacted map.	10:38:01
16	And so why when Dr. McCartan does it -- is	10:38:03
17	it -- do we accept that it's race blind, and when	10:38:08
18	the legislature does it, we assume that it's drawn	10:38:10
19	with a racial motivation.	10:38:13
20	A. I don't assume anything -- based on -- on	10:38:16
21	his maps or on the enactment of it, I don't assume	10:38:17
22	anything. I'm just looking at the data. And I	10:38:18
23	believe, even in B2, there is a larger range of HVAP	10:38:20
24	in 26, 27, and 28. But I state in my report that B2	10:38:26
25	is the most similar to the enacted map compared to	10:38:32

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1	the other alternative maps.	10:38:34
2	Q. And so, Dr. McCartan produced B2.	10:38:37
3	How much larger is the range of HVAP in	10:38:41
4	his map than in the enacted map?	10:38:46
5	A. I don't know. I would have to look to see	10:38:50
6	if I wrote this down somewhere in the initial	10:38:52
7	report.	10:38:54
8	Q. Okay. But it's maybe a percentage point	10:38:54
9	or so?	10:38:58
10	A. I don't know. It's -- the lowest HVAP in	10:38:59
11	B2, in the protected district, is 71.6, the highest	10:39:03
12	is 74.2, and in the enacted map, it's 73.2 and 74.2.	10:39:08
13	So that's a 1 percentage point difference in the	10:39:19
14	enacted map and --	10:39:22
15	Q. The 2.6?	10:39:23
16	A. -- 2.6 percentage points in the B2.	10:39:26
17	Q. So -- but you accept that Dr. McCartan	10:39:28
18	drew his maps, including B2, race blind, correct?	10:39:34
19	A. I was told to assume that they were drawn	10:39:38
20	racially neutral.	10:39:40
21	Q. Okay. But you take HVAPs in enacted	10:39:40
22	districts 26, 27, with 28, to be evidence that the	10:39:44
23	legislature considered race, even though	10:39:47
24	Dr. McCartan, drawing race blind, came up with very	10:39:49
25	similar HVAPs in map B2.	10:39:52

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1	A. I don't know that I would make a	10:39:56
2	conclusion that they were very similar.	10:39:57
3	Q. Okay. You think a range of 2.6 percentage	10:39:59
4	points is meaningfully different from a range of 1.0	10:40:07
5	percentage points -- or approximately 1 percentage	10:40:13
6	point?	10:40:16
7	A. Again, I do not opine about meaningful	10:40:17
8	differences. All I can say is that there is a	10:40:19
9	difference.	10:40:22
10	Q. Okay. And so you think that somewhere	10:40:23
11	between a range -- like, 1 percentage point and 2.6	10:40:26
12	percentage points, somewhere between that is where	10:40:31
13	you get evidence that the -- of race-based map	10:40:38
14	drawing?	10:40:41
15	A. I am not making that claim.	10:40:42
16	Q. Okay. In paragraph 18, where you say that	10:40:44
17	the three districts each contain areas with greater	10:41:05
18	than 90 percent Hispanic VAP and with less than	10:41:08
19	25 percent of Hispanic VAP, when you refer to	10:41:13
20	"areas," what geographic units are you referring to?	10:41:16
21	A. I don't recall exactly which unit I'm	10:41:22
22	using here, but probably sections of groups of	10:41:26
23	precincts or parts of the county.	10:41:34
24	Q. Okay. Do you know how many people live in	10:41:37
25	those areas with less than 25 percent Hispanic VAP?	10:41:40

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1	A. I don't.	10:41:47
2	Q. And so you don't know then -- if you don't	10:41:51
3	know how many people live there, you don't know how	10:41:52
4	that would impact the HVAP of a congressional	10:41:55
5	district with 769,000 people in it?	10:41:58
6	A. I cannot tell you off the top of my head.	10:42:02
7	Q. Do you have an opinion on what an	10:42:19
8	appropriate distribution of HVAPs is across	10:42:21
9	districts 26, 27, and 28? And when I say	10:42:24
10	"appropriate," what you would expect to see if race	10:42:29
11	were not considered.	10:42:32
12	A. I do not.	10:42:33
13	Q. Okay. Would you agree that Dr. McCartan,	10:42:34
14	although he produced, I believe, six congressional	10:42:41
15	maps, really has only three different versions of	10:42:45
16	26, 27, and 28?	10:42:48
17	A. It's -- they're grouped together in	10:42:55
18	table 2.	10:42:57
19	Q. Okay. So the configuration --	10:42:59
20	Dr. McCartan's configuration of districts 26, 27,	10:43:03
21	28, are the same in maps A, C1, C2, and D?	10:43:10
22	A. I don't know that the boundaries are all	10:43:15
23	identical but the HVAPs are identical.	10:43:17
24	Q. Okay. And then B1 is a little bit	10:43:21
25	different.	10:43:25

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1	Do you know to what extent B1 differs from	10:43:26
2	the version in A, C1, C2, and D?	10:43:31
3	ATTORNEY JONES: Objection to form.	10:43:37
4	A. What do you mean by "extent"?	10:43:38
5	Q. Do you know whether districts 26, 27,	10:43:40
6	and 28, and B1 differ from districts 26, 27, 28 in	10:43:48
7	A, C1, C2, and D, only slightly or significantly?	10:43:55
8	How would you assess the magnitude of the difference	10:43:58
9	between those districts?	10:44:03
10	ATTORNEY JONES: Objection to form.	10:44:06
11	A. I wouldn't assess the magnitude, the	10:44:07
12	difference --	10:44:08
13	Q. Is that something you looked at?	10:44:09
14	A. No.	10:44:16
15	Q. Do you know whether -- whether more	10:44:16
16	than 90 percent of the population in district 26 is	10:44:18
17	the same between map B1 and maps A, C1, C2, and D?	10:44:22
18	A. I do know.	10:44:30
19	Q. And do you know whether more	10:44:31
20	than 90 percent of the population of district 27 is	10:44:32
21	the same between maps B1 and A, C1, C2, and D?	10:44:35
22	A. I do not.	10:44:41
23	Q. Okay. And so, do you think that if	10:44:45
24	Dr. McCartan -- are you relying on Dr. McCartan's	10:44:51
25	maps as evidence that the distribution of HVAPs	10:44:54

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1	across districts 26, 27, and 28 indicates that race	10:45:00
2	was a factor?	10:45:04
3	A. I was asked to use his maps as a	10:45:06
4	comparison.	10:45:09
5	Q. Okay. And are you inferring, from his	10:45:09
6	maps and the HVAP distribution in his maps, that the	10:45:20
7	HVAP distribution in the enacted map indicates the	10:45:25
8	consideration of race?	10:45:28
9	A. I think that it suggests the use of race.	10:45:32
10	Q. Okay. And -- and that's despite the fact	10:45:35
11	that he only produced three versions of districts	10:45:39
12	26, 27, and 28, correct?	10:45:43
13	A. Again, I don't know how exactly A, C1, C2,	10:45:47
14	and D differ from one another. But in terms of	10:45:51
15	HVAPs, yes.	10:45:54
16	Q. In one of the three versions that he	10:46:01
17	produced is quite similar to the legislature's,	10:46:03
18	correct?	10:46:05
19	A. It is more --	10:46:06
20	ATTORNEY JONES: Objection to form.	10:46:08
21	A. It is more similar than the other two	10:46:09
22	groups of maps.	10:46:11
23	Q. And that there were only slight	10:46:11
24	differences between his 26, 27, and 28 in the other	10:46:13
25	two versions, correct?	10:46:17

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1	A.	I would not use any sort of qualifying	10:46:19
2		language. I don't know if it's slight or not.	10:46:22
3	Q.	Do you think it's warranted to rely on	10:46:26
4		such a small sample of maps to draw inferences about	10:46:28
5		what was or wasn't considered in the enacted map.	10:46:33
6	A.	Outside the scope of my assignment.	10:46:38
7	Q.	Well, you -- you are relying on them,	10:46:40
8		correct?	10:46:43
9	A.	I was asked to compare them.	10:46:44
10	Q.	Okay. And are you drawing inferences or	10:46:47
11		conclusions from the differences that you see	10:46:49
12		between the enacted map and Dr. McCartan's maps?	10:46:52
13	A.	I am -- I'm contributing analysis and	10:46:56
14		evidence that suggests that it is possible to draw	10:47:02
15		the map in a different way than the way it was	10:47:05
16		drawn.	10:47:09
17	Q.	Okay. "Possible to draw a map a different	10:47:09
18		way" seems different from saying that, you know,	10:47:16
19		Dr. McCartan's -- what Dr. McCartan did here is	10:47:20
20		evidence that the legislature considered race.	10:47:22
21		So I guess my question is: If you're	10:47:26
22		drawing conclusions about the legislature's use of	10:47:32
23		race from Dr. McCartan's map, why would it be	10:47:35
24		appropriate to use such a small number of maps drawn	10:47:39
25		by one person as indicative of what the legislature	10:47:42

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1	did or didn't do?	10:47:48
2	ATTORNEY JONES: Objection to form.	10:47:50
3	A. I was asked to compare the enacted map to	10:47:53
4	these maps, and this is what I was provided.	10:47:57
5	And my conclusions were consistent with	10:48:01
6	the idea that the congressional districts could be	10:48:02
7	drawn in such a way as to distribute Hispanic	10:48:08
8	voting-age population differently and in a way that	10:48:11
9	does not look as racially suspect as it does in the	10:48:15
10	enacted map.	10:48:20
11	Q. Okay. Do you think that Dr. McCartan's	10:48:21
12	three different configurations of districts 26, 27,	10:48:23
13	and 28 is a statistically significant sample of all	10:48:26
14	of the possible configurations of districts that	10:48:29
15	could be drawn?	10:48:31
16	A. "Statistically significant sample," I'm	10:48:35
17	not sure what that phrase means.	10:48:38
18	Q. Okay. You don't know what statistical	10:48:40
19	significance is?	10:48:41
20	A. I do know what statistical significance	10:48:43
21	is.	10:48:44
22	Q. Tell me why we would -- is three maps a	10:48:45
23	statistically significant number of maps out of the	10:48:52
24	universe of possible maps that could be created?	10:48:54
25	ATTORNEY JONES: Objection to form.	10:48:59

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1	A.	I'm not sure that we're understanding	10:49:02
2		"statistical significance" in the same way. So	10:49:02
3		maybe you want to clarify what you mean.	10:49:05
4	Q.	Okay. Do you know why, when computer	10:49:08
5		simulations of redistricting maps are done, they	10:49:13
6		tend to run thousands of maps from those computer	10:49:17
7		simulations?	10:49:20
8		ATTORNEY JONES: Objection to form.	10:49:21
9	A.	They can run them for different reasons.	10:49:22
10	Q.	Okay. There's no particular reason why	10:49:24
11		you would want to have a large sample of maps before	10:49:26
12		you start drawing inferences about what the enacted	10:49:28
13		map does or doesn't do?	10:49:31
14	A.	Again, this is -- this is not something I	10:49:34
15		have an opinion upon.	10:49:37
16	Q.	Okay. You don't have an opinion on	10:49:38
17		whether it's appropriate, statistically or in any	10:49:42
18		other way, to draw inferences about the enacted map	10:49:47
19		based solely on three alternative maps produced by	10:49:50
20		one person?	10:49:54
21	A.	If you are trying to make comparisons in a	10:49:58
22		sort of more formal statistical analysis, then you'd	10:50:02
23		want to have a large sample of maps.	10:50:10
24	Q.	Okay. And why is that?	10:50:13
25	A.	There is always a chance that the maps	10:50:20

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1 you're presented with are not representative of the 10:50:22
2 larger population of possible maps. 10:50:25

3 Q. And would you agree that there are many 10:50:28
4 different ways that maps can be drawn? 10:50:31

5 A. Yes. 10:50:33

6 ATTORNEY JONES: Andy, we've been going 10:50:52
7 for about an hour and a half. Is now is good 10:50:53
8 time for a break? 10:50:55

9 ATTORNEY BARDOS: Yes. Yeah, this is a 10:50:57
10 good time. Should we get back together at 10:51:00
11 11:00? 10:51:09

12 (Recess.) 10:51:13

13 THE COURT REPORTER: We are back on the 11:02:23
14 record at 11:02 Eastern Time. 11:02:24

15 Q. Okay. Dr. Abbott, Dr. McCartan didn't 11:02:30
16 produce any alternative maps in which he included a 11:02:34
17 congressional district that went from Miami-Dade 11:02:37
18 over to Collier County, correct? 11:02:40

19 A. I believe that's correct. He did not 11:02:44
20 split Collier County. 11:02:46

21 Q. And so, we don't know, then, from 11:02:51
22 Dr. McCartan's maps, what the HVAP distribution 11:02:54
23 would have been if someone had decided to draw a 11:03:00
24 district over to Collier County for race-neutral 11:03:03
25 reasons? 11:03:09

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1	A.	We don't know what another map would have	11:03:12
2		looked like if it had not been drawn.	11:03:14
3	Q.	Okay. And -- and specifically, we don't	11:03:16
4		know what the HVAP distribution would have been in a	11:03:20
5		map that includes Miami-Dade to Collier District if	11:03:25
6		Dr. McCartan had decided to draw such a map?	11:03:30
7	A.	If he did not do that, then we don't know	11:03:33
8		what the distribution would have looked like if he	11:03:35
9		had.	11:03:37
10	Q.	Okay. Now, we talked earlier about the	11:03:37
11		HVAPs being similar despite regional variations in	11:03:43
12		HVAP.	11:03:49
13		In Dr. McCartan's maps, the HVAPs between	11:03:53
14		district 27 and 28 seems to be very similar.	11:03:57
15		Did you consider that, and do you have any	11:04:04
16		theory as to why he achieved very similar HVAPs in	11:04:06
17		districts 27 and 28, despite those regional	11:04:11
18		variations that we talked about?	11:04:15
19	ATTORNEY JONES:	Objection to form.	11:04:16
20	A.	There is a bigger difference between 27	11:04:20
21		and 28 than in the enacted map, but I do not have	11:04:22
22		any opinions as to why or how they look the way they	11:04:28
23		do.	11:04:35
24	Q.	Does that make you question whether your	11:04:36
25		opinion about regional variations producing larger	11:04:36

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1	HVAP variations from district to district is sound?	11:04:38
2	A. Can you repeat the question?	11:04:45
3	Q. Does the fact that Dr. McCartan achieved	11:04:47
4	very similar HVAPs in districts 27 and 28 make you	11:04:50
5	question your argument that the legislature's	11:04:54
6	districts, 26, 27, 28, are suspect because they have	11:05:01
7	similar HVAPs?	11:05:05
8	A. It does not.	11:05:07
9	Q. Okay. Why is that?	11:05:08
10	A. It is -- that race is one possible reason	11:05:09
11	for why they were drawn the way they were, and the	11:05:15
12	evidence is consistent with the idea that race was	11:05:18
13	the reason.	11:05:21
14	Q. Okay. If -- if you had not been told that	11:05:22
15	Dr. McCartan didn't consider race, would you	11:05:27
16	consider the HVAPs in his district -- or would you	11:05:29
17	consider race to be one possible reason for the	11:05:33
18	HVAPs in his district?	11:05:36
19	A. Potentially.	11:05:38
20	Q. Okay. And apart from map B2, is it fair	11:05:39
21	to say that he has an HVAP of approximately 90% in	11:05:47
22	one of his district and approximately 65 percent in	11:05:50
23	the other districts?	11:05:56
24	A. Yes.	11:05:58
25	Q. And is it your understanding that -- so	11:06:05

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1 the legislature -- the only district that is 11:06:07
2 currently being challenged in the congressional map 11:06:09
3 is district 26. 11:06:11

4 And so if Dr. McCartan would increase the 11:06:15
5 HVAP in district 26 from approximately 73 percent in 11:06:18
6 the enacted map up to 90 percent in most of his 11:06:22
7 maps, do you -- what is your -- like, how does that 11:06:26
8 impact your theory? Are you saying that the 11:06:35
9 legislature intentionally suppressed the HVAP in 11:06:37
10 district 26? 11:06:42

11 ATTORNEY JONES: Objection to form. 11:06:43

12 A. I am not making that claim. 11:06:47

13 Q. Okay. Are you saying that the 11:06:49
14 legislature -- what are you saying that the 11:06:51
15 legislature did with the HVAP, specifically in 11:06:54
16 district 26? 11:06:57

17 A. In the enacted map, I am saying that there 11:06:58
18 is evidence to suggest that the districts, the three 11:07:02
19 districts, were drawn in such a way as to evenly 11:07:06
20 distribute the Hispanic voters into majority 11:07:09
21 districts, while maintaining, as I said, uniform 11:07:13
22 degrees of Hispanic voting-age population across 11:07:21
23 those three districts. 11:07:24

24 Q. Okay. If the only map that Dr. McCartan 11:07:26
25 had produced were map B2, in which there was a 11:07:29

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1	fairly even distribution of HVAPs, and the	11:07:32
2	legislature had produced a map with 90-65-65 split,	11:07:35
3	what inference would you draw then?	11:07:44
4	A. I'm not sure that I would have drawn any	11:07:47
5	inference from that fact alone.	11:07:48
6	Q. If Dr. McCartan had produced only one map,	11:07:52
7	and that map had the 90-65-65 split, would you have	11:07:54
8	still rendered the opinion that -- or infer from	11:07:59
9	that that the legislature considered race and tried	11:08:02
10	to balance the HVAPs in its districts?	11:08:06
11	ATTORNEY JONES: Objection to form.	11:08:08
12	A. So the maps were there, from my opinion,	11:08:11
13	from my understanding, and my use of them, to show	11:08:17
14	that it was possible to draw the maps in a way that	11:08:23
15	was different from the enacted map and spread	11:08:26
16	Hispanic voting-age population across the three	11:08:31
17	districts in a different way.	11:08:33
18	If one map had been provided to me and it	11:08:37
19	was, let's say, map B1, that would have been	11:08:40
20	evidence that the map would be drawn differently	11:08:44
21	than the enacted map.	11:08:48
22	Q. Okay. Apart from simply evidence that the	11:08:49
23	map could be drawn differently, are you using	11:08:52
24	Dr. McCartan's maps as evidence that the legislature	11:08:55
25	considered race in drawing districts?	11:08:58

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1	A. Not explicitly, but it is part of an	11:09:05
2	overall picture we see given all of the other pieces	11:09:10
3	that I present in my report.	11:09:13
4	Q. And when you say "not explicitly," what do	11:09:15
5	you -- what do you mean?	11:09:21
6	A. I mean that I -- the only firm conclusion	11:09:22
7	I can draw and -- draw from comparing the enacted	11:09:26
8	map to his alternative maps, is that the map can be	11:09:30
9	drawn in such a way as to disperse Hispanic	11:09:33
10	voting-age population differently in a more -- in a	11:09:37
11	way that's more expected.	11:09:40
12	Q. You also point to Dr. McCartan's maps --	11:09:45
13	this is in paragraph 20 of your initial report, to	11:09:49
14	CDs 19 and 24. And you say that the enacted map	11:09:53
15	concentrates most of the regions' Hispanic residents	11:09:59
16	into those three districts, meaning	11:10:05
17	districts 26, 27, 28, with a resultant reduction in	11:10:07
18	Hispanic concentration of adjacent districts.	11:10:13
19	So is it your opinion that the	11:10:15
20	legislature -- that the HVAPs of CDs 19 and 24 in	11:10:17
21	the enacted map were reduced or suppressed by the	11:10:24
22	fact that the legislature was concentrating Hispanic	11:10:30
23	voters in 26, 27, and 28?	11:10:33
24	A. That was a result of the way that the map	11:10:43
25	was drawn.	11:10:45

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1	Q. Okay. Did you look at how many	11:10:46
2	Hispanic -- Hispanics of voting age Dr. McCartan has	11:10:47
3	in districts 26, 27, and 28 in his maps?	11:10:51
4	A. The number of people?	11:10:55
5	Q. Yes.	11:10:56
6	A. No.	11:10:57
7	Q. Okay. If Dr. McCartan had -- well, let's	11:10:58
8	take a look.	11:11:02
9	Do you have Dr. Trende's report in front	11:11:03
10	of you?	11:11:06
11	A. Yes.	11:11:08
12	Q. Take a look at Tables 7 and 8.	11:11:09
13	A. What page are they on?	11:11:12
14	Q. I will find that in a moment.	11:11:15
15	ATTORNEY JONES: Page 52.	11:11:38
16	Q. Take a look at Table 7.	11:11:40
17	Do you see that Table 7?	11:11:42
18	A. Yeah.	11:11:43
19	Q. Did you verify those numbers in Table 7?	11:11:44
20	A. No.	11:11:47
21	Q. Okay. Let's assume that they're accurate	11:11:48
22	for the sake of this question.	11:11:49
23	Do you see, in this table, that the total	11:11:53
24	number of Hispanics of voting age in districts 26,	11:11:55
25	27, and 28 is very similar in Dr. McCartan's maps to	11:11:58

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1	the enacted map and, in fact, in -- most of his maps	11:12:04
2	have more people than the enacted map does.	11:12:11
3	Do you see that?	11:12:12
4	A. More Hispanic.	11:12:15
5	Q. More Hispanic voting age. Correct.	11:12:16
6	If that's true, then would the increase in	11:12:19
7	HVAP in districts 19 and 24 in Dr. McCartan's maps	11:12:24
8	be attributable to 26, 27, and 28?	11:12:31
9	ATTORNEY JONES: Objection to form.	11:12:38
10	A. I don't know. I would have to look at	11:12:40
11	what happens to those districts, which Dr. Trende	11:12:42
12	did not do or present.	11:12:47
13	Q. Okay. So if Dr. McCartan has more	11:12:48
14	Hispanics of voting age in those three districts	11:12:51
15	than the legislature does, then he can't also be	11:12:52
16	increasing the HVAP of 19 and 24 out of those same	11:12:57
17	districts, right? That wouldn't be possible?	11:13:02
18	A. He could be increasing them from other	11:13:09
19	districts.	11:13:11
20	Q. Right. And so did you look at whether	11:13:11
21	there were other districts from which districts 19	11:13:13
22	and 24 received their increase in Hispanic	11:13:17
23	population in McCartan's maps?	11:13:19
24	A. I did not, and neither did Dr. Trende	11:13:27
25	so...	11:13:32

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1	Q.	So are you assuming that 19 and 24	11:13:32
2		received their additional populations out of	11:13:36
3		districts 26, 27, and 28.	11:13:38
4	A.	I'm not assuming anything. I'm looked at,	11:13:42
5		as the table shows, the changes in percentage of the	11:13:45
6		Hispanic voting-age population, not the total number	11:13:48
7		of Hispanic voting-age population.	11:13:51
8	Q.	But are you inferring from districts 19	11:13:54
9		and 24, their HVACs, that the legislature	11:13:57
10		concentrated Hispanic voters in 26, 27, and 28?	11:14:00
11	A.	Can you repeat the question?	11:14:04
12	Q.	So when I -- when I read your report, I	11:14:06
13		read it to say that the HVAP in 19 and 24 was	11:14:10
14		lowering the enacted map, higher than Dr. McCartan's	11:14:17
15		maps and that that's because the legislature was	11:14:20
16		concentrating Hispanic voters in 26, 27, and 28, but	11:14:24
17		now we see that Dr. McCartan has at least the same	11:14:29
18		number of people in those three districts.	11:14:32
19		So what inferences are you drawing from	11:14:34
20		the HVAPs in 19 and 24?	11:14:36
21	A.	I am not making any inferences in the	11:14:39
22		HVAPs for 19 and 24. I am not opining on how	11:14:42
23		those -- those districts changed in between the	11:14:46
24		enacted and the alternative maps.	11:14:49
25	Q.	Okay. And so, you didn't look at whether	11:14:50

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1 district 19 might have, in Dr. McCartan's maps, had 11:14:52
2 an increase in HVAP, not because of 26, 27, and 28, 11:14:58
3 but because it took Hendry County from district 18. 11:15:02
4 You did not look at that? 11:15:07

5 A. I did not look at that. 11:15:09

6 Q. And you didn't look at whether HVAP in 11:15:10
7 district 24 in Dr. McCartan's maps might have 11:15:12
8 received an increase in HVAP, not because of 26, 27, 11:15:15
9 and 28, but because it moved into the mere Miramar 11:15:18
10 area of Broward County. You did not look at that? 11:15:22

11 A. I did not look at that. 11:15:26

12 Q. Now, if Dr. McCartan has shown through his 11:15:33
13 maps that it's possible to have three districts in 11:15:36
14 Miami-Dade and Monroe County with the same number, 11:15:41
15 at least with the same number of Hispanics of voting 11:15:45
16 age as in the enacted map, then do you have any 11:15:48
17 theory as to why the legislature would have taken 11:15:50
18 one of those districts into Collier County which has 11:15:52
19 a lower HVAP than Miami-Dade does? 11:15:55

20 ATTORNEY JONES: Objection to form. 11:15:58

21 A. I do not have any theories. 11:16:01

22 Q. Okay. Let's go now on to your analysis of 11:16:02
23 splits, split counties, and let's start with 11:16:28
24 paragraph 22, and you mention district 26 going into 11:16:33
25 Collier County, and the -- and that the enacted map, 11:16:37

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1 or enacted district 26, the portion of it that is in 11:16:41
2 Collier County has a HVAP of 31.8 percent and the 11:16:46
3 portion of Collier County in districts 18 and 19 has 11:16:53
4 an HVAP of 13.7 percent. 11:16:57

5 Do you agree that the portion of Collier 11:17:01
6 County that is specifically in district 18 has an 11:17:03
7 HVAP of 84.2 percent? 11:17:05

8 A. I do not know. 11:17:10

9 Q. Okay. So you averaged -- or you 11:17:11
10 considered districts 18 and 19 together here and 11:17:14
11 came up with a single HVAP for the portions of 18 11:17:16
12 and 19 that are in Collier County. 11:17:20

13 Is there any reason why you wouldn't have 11:17:22
14 looked at 18 and 19 separately? 11:17:23

15 A. The reason was because 26 was the 11:17:26
16 challenge district and a protected district and 18 11:17:31
17 and 19 are not. 11:17:33

18 Q. Okay. Would it be relevant to your 11:17:36
19 analysis if district 18's portion of Collier County 11:17:37
20 had an 84 percent HVAP? 11:17:40

21 A. Not particularly. 11:17:43

22 Q. Okay. The fact that the legislature could 11:17:45
23 have found a portion of Collier County with an 11:17:47
24 84 percent HVAP but didn't include it in district 26 11:17:51
25 is not relevant? 11:17:55

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1	A.	Not particularly.	11:17:57
2	Q.	Okay. Do you know whether it would have	11:17:59
3		been possible for the legislature to incorporate the	11:18:06
4		part of district 18 that's in Collier County into	11:18:08
5		district 26?	11:18:12
6		ATTORNEY JONES: Objection to form.	11:18:14
7	A.	What do you mean by "possible"?	11:18:16
8	Q.	Would it have been possible to draw the	11:18:18
9		map that way?	11:18:19
10	A.	If they're -- if district 18 and 24 are	11:18:21
11		contiguous and the portion of Collier County that is	11:18:27
12		in district 18 is contiguous with district 26, then	11:18:30
13		yes, it's possible to include that portion.	11:18:35
14	Q.	Would you agree that, in Collier County,	11:18:39
15		the predominantly white, non-Hispanic portions are	11:18:40
16		along the west coast?	11:18:47
17	A.	That looks right.	11:18:52
18	Q.	Okay. And so if you have a district	11:18:54
19		coming west from Miami-Dade County, necessarily the	11:18:56
20		part that it would reach last would be the west	11:19:01
21		coast, right?	11:19:03
22	A.	That's correct. But if you look at	11:19:09
23		Figure 1 and you look at district 26, that whole	11:19:11
24		portion of district 26, you know, it looks somewhat	11:19:14
25		similar to the portion that was not included.	11:19:21

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1	Q. Okay. Let's look at in the same	11:19:45
2	paragraph, you mention Miami-Dade County, and you	11:19:47
3	mention that CD 24 has a -- has an HVAP of	11:19:50
4	39.3 percent.	11:19:56
5	Did you consider any reasons why CD 24	11:19:58
6	might have a lower HVAP than CDs 26, 27, 28?	11:20:03
7	A. I know that district 24 is a	11:20:12
8	Black-protected district.	11:20:15
9	Q. Okay. And would you agree that the	11:20:16
10	legislature's efforts to draw a district that	11:20:19
11	provides Black voters with the ability to elect the	11:20:25
12	candidates of their choice might be at least one	11:20:28
13	reason why district 24 has a lower HVAP than	11:20:31
14	surrounding districts?	11:20:35
15	A. I don't know. I did not do that analysis.	11:20:38
16	Q. Okay. But it's possible?	11:20:40
17	A. I don't know by your question.	11:20:44
18	Q. But that's not -- and so that's not	11:20:52
19	something that you analyzed, whether -- whether the	11:20:53
20	protected nature of district 24 might be a reason	11:20:58
21	for the lower HVAP within that area, within that	11:21:01
22	district?	11:21:04
23	A. Within the entirety of district 24?	11:21:07
24	Q. Yes.	11:21:09
25	A. Yes, if you need to have a higher Black	11:21:11

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1 voting-age population, then, by construction, you're 11:21:14
2 going to have a lower Hispanic voting-age 11:21:17
3 population. 11:21:19

4 Q. Okay. Now, you also mention in 11:21:20
5 paragraph 22, the differences -- this is within 11:21:25
6 Miami-Dade County, the differences in HVAP between 11:21:32
7 districts 26, 27, and 28. And I guess I wasn't 11:21:39
8 clear whether, let's see, the portions of the county 11:21:48
9 in the other two Hispanic protected districts, 27 11:22:02
10 and 28, are 72.4 percent, Hispanic VAP, with 36,002, 11:22:05
11 and 80 percent -- 80.2 percent Hispanic VAP with 11:22:14
12 538,514 total VAP respectively. 11:22:18

13 What is the point you're making there? 11:22:25

14 A. The point that I'm making is that the 11:22:27
15 portions of Miami-Dade that were given to the 11:22:29
16 Hispanic protected districts that are not challenged 11:22:31
17 look similar, somewhat similar, to the portion that 11:22:36
18 was given to the Hispanic protected and challenged 11:22:39
19 district 26 that looks very different from the 11:22:41
20 non-Hispanic protected district. 11:22:45

21 Q. Okay. And so setting district 24 aside, 11:22:47
22 are you drawing any inferences from the HVAP levels 11:22:50
23 within 26, versus 27, versus 28, or is it simply 11:22:55
24 comparing those three districts to 24? 11:23:01

25 A. It's saying that they are -- 26, 27, 28 11:23:04

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1 portions of Miami-Dade county looks somewhat similar 11:23:08
2 to one another. 11:23:13

3 Q. Okay. And from that fact alone, separate 11:23:14
4 from 24, just 26, 27, and 28, are you inferring 11:23:16
5 anything from that, or is that just kind of part of 11:23:20
6 the factual background to your comparison to 11:23:22
7 district 24? 11:23:25

8 A. The part of the background. 11:23:26

9 Q. Okay. All right. Let's move to 11:23:28
10 paragraph 23. And this is the portion of the report 11:23:35
11 where you talk about splits of municipalities and 11:23:42
12 CDPs, and you mention Immokalee, and the portion of 11:23:47
13 Immokalee that is in CD 18 as 84.6 percent Hispanic. 11:23:52

14 Do you know -- I guess you don't claim to 11:24:00
15 know why the legislature would have passed up that 11:24:02
16 portion of Immokalee with 84.6 HVAP and not include 11:24:06
17 that in district 26? 11:24:11

18 A. I have no theories. 11:24:14

19 Q. Okay. Now, in looking at Miami, City of 11:24:15
20 Miami, and then the Brownsville, Gladeview and West 11:24:20
21 Little River CDPs, did you examine whether there 11:24:26
22 were any alternative explanations for the HVAP 11:24:31
23 splits that you identified in this portion of your 11:24:36
24 report? 11:24:39

25 A. I did not. 11:24:40

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1	Q. Okay. Do you recall whether, in your	11:24:42
2	expert reports in the Grace case, you looked at	11:24:46
3	alternative explanations and addressed and attempted	11:24:53
4	to rebut alternative explanations for the -- what	11:24:56
5	you saw as racially-influenced redistricting?	11:25:04
6	A. I cannot recall.	11:25:08
7	Q. Okay. Let's -- let's take a look at that.	11:25:11
8	I will --	11:25:15
9	ATTORNEY BARDOS: Carmen, would you mind	11:25:19
10	adding -- let's see. Would you mind adding	11:25:21
11	Exhibit 12 to the chat, and I will share it on	11:25:28
12	my screen.	11:25:31
13	(Plaintiffs' Exhibit No. 12 was	11:25:32
14	marked for identification.)	11:25:32
15	Q. Okay. Dr. Abbott, is this your report	11:25:43
16	from the Grace case?	11:25:46
17	A. Yup. Yes, it is.	11:25:49
18	Q. Okay. And on the first page here, it says	11:25:51
19	in the second paragraph:	11:25:53
20	"I was asked by Plaintiff's counsel in	11:25:55
21	this case to use data on voting-age	11:25:58
22	population, and citizen voting-age	11:26:00
23	population and voting patterns within	11:26:04
24	individual city precincts in order to	11:26:05
25	determine whether, and to what extent,	11:26:06

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1	race can explain the overall shapes of	11:26:08
2	the 2022 enactive plan districts, as	11:26:10
3	well as the changes between the 2013	11:26:12
4	plan and the 2022 plan."	11:26:15
5	And a little further down at the bottom of	11:26:17
6	that page, you say:	11:26:19
7	"I will also consider alternative	11:26:22
8	explanations for the boundary changes	11:26:24
9	and show that these alternatives cannot	11:26:25
10	explain the patterns observed above."	11:26:30
11	Do you see that?	11:26:32
12	A. I do.	11:26:32
13	Q. And then further down, on page 12, you	11:26:33
14	begin to review alternative explanations for the	11:26:41
15	patterns that you see, and one is:	11:26:46
16	"Partisan gerrymandering, partisan	11:26:48
17	gerrymander, maintaining the	11:26:50
18	partisanship of the district cores.	11:26:53
19	Keeping incumbents in their districts,	11:26:57
20	maintaining the cores of existing	11:27:00
21	districts, compactness."	11:27:02
22	And you examine those alternative	11:27:04
23	explanations.	11:27:06
24	And then, finally, on page 22, you -- you	11:27:08
25	have your conclusions. And you say:	11:27:15

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1 "I found no evidence that any factors 11:27:19
2 other than race and ethnicity affected 11:27:22
3 the drawing of district lines in pursuit 11:27:24
4 of equalizing population across 11:27:25
5 districts." 11:27:27

6 So is there any reason why, in the Grace 11:27:29
7 case, you have examined alternative explanations and 11:27:32
8 attempted to address alternative explanations for 11:27:34
9 the patterns that you were seeing and in this case, 11:27:36
10 you did not? 11:27:41

11 A. I believe I was asked by counsel in the 11:27:44
12 Grace case to address those alternative 11:27:46
13 explanations. 11:27:48

14 Q. Okay. And in this case, you were not 11:27:49
15 asked? 11:27:51

16 A. Correct. 11:27:52

17 Q. Okay. All right. And going back to your 11:27:52
18 report -- I'll stop sharing my screen. I always 11:28:01
19 fail to stop sharing my screen. So this time, I did 11:28:06
20 it. 11:28:10

21 So going back to your report on page 12, 11:28:10
22 Footnote 6, I think you say here that you understand 11:28:13
23 or recognize that CDPs don't have the same protected 11:28:16
24 status under Florida law that municipalities do. 11:28:22

25 Is that -- am I understanding that 11:28:25

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1	correctly?	11:28:26
2	A. Yes.	11:28:27
3	Q. Now, do you still -- do you think that,	11:28:28
4	notwithstanding that, analyzing CDPs is still	11:28:30
5	relevant?	11:28:34
6	A. Yes.	11:28:35
7	Q. Okay. Explain why.	11:28:35
8	A. CDPs are -- they're useful because they	11:28:38
9	are understood units of analysis. They are, to some	11:28:43
10	degree, what one would consider a community of	11:28:50
11	interest, and they are, you know, another way to	11:28:53
12	sort of slice the pie and see how the map is being	11:28:58
13	drawn.	11:29:03
14	Q. Okay. And just for the record and just	11:29:04
15	for information: What is a CDP?	11:29:07
16	A. A CDP is a Census Designated Place.	11:29:12
17	Q. Okay. And what is a Census Designated	11:29:16
18	Place?	11:29:20
19	A. I do not know what the formal definition	11:29:21
20	is, but they are officially designed -- they are	11:29:23
21	officially defined units of geographical analysis.	11:29:26
22	Q. Do you know who -- sorry. Do you know who	11:29:31
23	defines them?	11:29:33
24	A. The census?	11:29:35
25	Q. Mm-hmm, okay.	11:29:36

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1	And do CDPs have a local government like a	11:29:41
2	city or a county would?	11:29:44
3	A. No, they are unincorporated as far as I	11:29:46
4	understand.	11:29:48
5	Q. Okay. Do you -- do you recall seeing, in	11:29:49
6	Dr. Trende's report, where he mentioned that Golden	11:29:57
7	Gate CDP was also split between districts --	11:30:02
8	district 26 in one of the neighboring districts and	11:30:09
9	that he thought that that it was omitted here on	11:30:14
10	page 23 of your report?	11:30:16
11	A. I do recall him talking about CDP, but I	11:30:19
12	don't remember that point.	11:30:23
13	Q. Okay. Is that something that you've	11:30:24
14	checked on since your report --	11:30:25
15	A. No.	11:30:30
16	Q. Okay. That's fine.	11:30:31
17	All right. Let's look at paragraphs 24	11:30:36
18	and 25. And this is about VTDs.	11:30:40
19	What is a VTD?	11:30:43
20	A. A Voting Tabulation District.	11:30:45
21	Q. Okay. And do you know whether VTDs always	11:30:47
22	align with precinct boundaries?	11:30:52
23	A. They do not, but they very often do.	11:30:57
24	Q. Okay. So just so I understand what you	11:30:59
25	used here, did you use VTDs lines as defined by the	11:31:02

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1	census or precinct boundaries as defined by local	11:31:07
2	supervisors of elections?	11:31:11
3	A. I used -- I used VTDs as defined by the	11:31:12
4	census. I would have to double-check, but I'm	11:31:18
5	pretty sure it was the VTDs defined by the census.	11:31:21
6	Q. Okay. Do you know, one way or the	11:31:25
7	another, whether the legislature used VTDs in	11:31:26
8	drawing maps?	11:31:30
9	A. I think my understanding is that they are	11:31:32
10	not -- they do not formally use precincts in their	11:31:34
11	drawing of the maps.	11:31:38
12	Q. Okay. And similar question as to this --	11:31:40
13	as to CDPs earlier: Is the fact that the	11:31:45
14	legislature, if it didn't use VTDs, that do you	11:31:50
15	think that affects the relevance of VTDs for	11:31:54
16	purposes of an analysis like this?	11:31:58
17	A. I don't. I do not.	11:32:00
18	Q. Okay. Explain why.	11:32:02
19	A. Again, they are -- they can be construed	11:32:05
20	as kind of a community of interest. But VTDs -- the	11:32:10
21	precincts are in the Florida redistricting software,	11:32:13
22	from what I understand. They are a very, very	11:32:16
23	commonly used unit of analysis. They are the lowest	11:32:17
24	level at which election returns can be observed.	11:32:23
25	And they are just the most commonly used unit of	11:32:31

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1	analysis to compare maps to.	11:32:34
2	Q. Where do you get your understanding that	11:32:41
3	the legislature's map-drawing application includes	11:32:43
4	VTDs?	11:32:46
5	A. I believe -- I believe counsel informed me	11:32:49
6	of that.	11:32:54
7	Q. Okay. Does your analysis VTDs assume that	11:32:54
8	the legislature, when it was drawing in these areas	11:33:01
9	where the VTDs are, knew what the Hispanic VAP or	11:33:06
10	Hispanic distribution was and drew the line in a way	11:33:12
11	that took in greater concentrations and excluded	11:33:18
12	lesser concentrations of Hispanics?	11:33:22
13	A. My evidence and analysis is consistent	11:33:25
14	with that, yes.	11:33:27
15	Q. Okay. If the legislature, in drawing the	11:33:28
16	maps around where these VTDs are, was not aware of	11:33:33
17	the specific age VAP of those areas or was not aware	11:33:37
18	of the distribution of Hispanic voters in those	11:33:44
19	areas, how does that impact your analysis?	11:33:50
20	A. I'm not sure that it does. I can't make	11:33:58
21	any legal determinations.	11:34:01
22	Q. Okay. If it was unaware of the HVAP in	11:34:03
23	the -- in these areas where the VTDs are, then would	11:34:06
24	you agree that they wouldn't have been able to	11:34:11
25	intentionally split these VTDs in a way to take in	11:34:16

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1	greater concentrations of Hispanic voters and	11:34:18
2	exclude lesser concentrations?	11:34:21
3	A. I don't know. I'm not sure.	11:34:25
4	Q. Okay. Is there any way that you can think	11:34:27
5	of, that they would have been able to split these	11:34:30
6	VTDs, to take in greater and exclude lesser	11:34:34
7	concentrations of Hispanic voters, if they didn't	11:34:37
8	know the HVAP or the Hispanic distribution or	11:34:39
9	concentration in these areas?	11:34:43
10	ATTORNEY JONES: Objection to form.	11:34:46
11	A. There are other proxies for Hispanic	11:34:48
12	voting-age population.	11:34:53
13	Q. Okay. What are those?	11:34:55
14	A. I don't know. I cannot speculate on what	11:34:58
15	the legislature would have relied upon to proxy for	11:35:00
16	that.	11:35:03
17	Q. Okay. Now, in your -- in this section of	11:35:05
18	your report where you analyze VTDs, just to I	11:35:16
19	understand: In your initial report, you excluded	11:35:20
20	the under-100 VTDs. And my understanding of that	11:35:23
21	is, if you have a split VTD or if you have a pair of	11:35:26
22	contiguous VTDs, if at least one of those portions	11:35:32
23	or one of those VTDs was under 100, you excluded it	11:35:36
24	from your analysis?	11:35:40
25	A. In the initial report. That's correct.	11:35:42

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1	Q.	Okay. And when did you make the decision	11:35:44
2		to exclude those VTDs from your analysis? Had you	11:35:48
3		already done the analysis, or did you do that at the	11:35:52
4		outset of your analysis?	11:35:55
5	A.	Prior to my analysis.	11:35:56
6	Q.	Okay. So you didn't see the results	11:35:57
7		before you made that decision?	11:36:00
8	A.	No.	11:36:01
9	Q.	Okay. All right.	11:36:02
10		Let me show you an exhibit.	11:36:08
11	ATTORNEY BARDOS:	This is Exhibit 6.	11:36:10
12		(Plaintiffs' Exhibit No. 6 was	11:36:13
13		marked for identification.)	11:36:13
14	Q.	All right. So in Table 3 of your report,	11:36:27
15		do I understand correctly that Table 3 concerns only	11:36:29
16		VTDs that were split along the boundary of	11:36:33
17		district 26, where 26 meets, you know, a district	11:36:37
18		that's not protected? And we'll get to my exhibit	11:36:42
19		in a second. I just want to understand your	11:36:46
20		table first.	11:36:48
21	A.	Okay.	11:36:49
22	Q.	And I'll start over. I'll start over.	11:36:51
23		So your Table 3 --	11:36:53
24	A.	Okay.	11:36:55
25	Q.	-- do I understand correctly that it	11:36:56

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1 concerns only split VTDs along the border of 11:36:58
2 district 26? 11:37:03

3 A. Yes, so it only concerns splits of the 11:37:05
4 same precinct. So it's comparing one split of the 11:37:10
5 same precincts to the other split of the same 11:37:14
6 precinct. 11:37:17

7 Q. Right. Now, what I've done in Exhibit 6 11:37:18
8 is I've taken the information from ^in your table, 11:37:21
9 and I sorted it from the highest HVAP to the lowest. 11:37:27
10 So on the left, you have the VTDs that you identify 11:37:30
11 in your Table 3, on the left, those that were 11:37:34
12 included in district 26, and then on the right, VTDs 11:37:38
13 that were excluded from 26, again, sorted from 11:37:42
14 highest HVAP to lowest. So I'm not lining them up 11:37:46
15 next to their split portions. 11:37:49

16 And if you'd like to take a second to kind 11:37:55
17 of look at your report, and you can feel free to 11:38:00
18 check this or -- if you'd like. But let me know 11:38:03
19 when -- if you need a moment. 11:38:08

20 A. Yeah, so I'm a little bit confused. So as 11:38:12
21 an example, you have Collier 002 excluded on the 11:38:17
22 right-hand side from CD 26, but then on the 11:38:24
23 left-hand side, you have Collier 002 included in 11:38:27
24 CD -- 11:38:31

25 Q. Yeah, and that would be because these 11:38:32

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1	would be split VTDs. So every VTD would have an	11:38:35
2	included portion and an excluded portion.	11:38:38
3	A. Included in CD 26 --	11:38:40
4	Q. Yes.	11:38:43
5	A. -- or included in my table?	11:38:43
6	Q. So all of the --	11:38:46
7	A. These are all from my original table.	11:38:49
8	Q. Yes, all from your original table.	11:38:51
9	A. Okay. Okay.	11:38:53
10	Q. I just sort them differently, so that it's	11:38:55
11	from the highest HVAP to the lowest.	11:38:57
12	A. Okay. Okay.	11:39:00
13	Q. Is that --	11:39:01
14	A. Okay. I think so, yeah.	11:39:02
15	Q. Okay. All right. In looking at it this	11:39:04
16	way, and, you know, we see that there are a number	11:39:06
17	of VTD fragments with some pretty low HVAPs that	11:39:09
18	were included in the district, such as Collier 12	11:39:16
19	at 9.7 percent, and Collier 79 at 11.6 percent,	11:39:22
20	Collier 2 at 12.7 percent, Collier 70 at 23.3	11:39:27
21	percent.	11:39:36
22	And then on the other side, you see that	11:39:36
23	there were VTD fragments with quite high HVAPs that	11:39:38
24	were excluded from the district, such as Collier	11:39:42
25	134, 84.6 percent, Collier 71, 61.1 percent, and	11:39:47

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1	Miami-Dade at 538 at 53.4 percent.	11:39:55
2	Is there any -- do you have any reason --	11:40:02
3	any theory as to why the legislature would have	11:40:04
4	included VTD fragments with HVAPs of 9.7	11:40:07
5	percent, 11.6 percent, 12.7 percent, 23.3	11:40:10
6	percent, 33.6 percent, but excluded VTDs fragments	11:40:17
7	with HVAPs with 84.6 percent, 67.1 percent,	11:40:23
8	53.4 percent, 48.7 percent, 47.8 percent?	11:40:26
9	I'm sorry, I'm not hearing you.	11:40:40
10	ATTORNEY CARTAYA: I can't hear you	11:40:53
11	either.	11:40:54
12	ATTORNEY JONES: I think the --	11:41:06
13	ATTORNEY BARDOS: I hear Patrick.	11:41:11
14	THE WITNESS: Is this better?	11:41:36
15	ATTORNEY BARDOS: Yes, perfect.	11:41:43
16	THE WITNESS: I think Zoom changed the	11:41:44
17	microphone.	11:41:45
18	A. So -- so I -- I'm comparing portions of	11:41:46
19	the same precinct that are separated by a boundary	11:41:49
20	line, separated by the CD 26 boundary line. It is	11:41:54
21	not clear to me how you can make these comparisons	11:42:00
22	when I don't know which of these precinct splits are	11:42:04
23	touching which other precincts, right? We're	11:42:09
24	talking about the decision to include a portion of	11:42:12
25	one precinct relative to a portion of another same	11:42:17

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1	precinct based on where a mapmaker drew a line.	11:42:24
2	Q. Okay. So why would you limit that to the	11:42:28
3	touching portions? Why -- let me ask this: So all	11:42:30
4	of the precinct or VTD portions that are referenced	11:42:35
5	in Table 3 of your report are abutting the boundary	11:42:39
6	of district 236, correct?	11:42:43
7	A. Correct.	11:42:45
8	Q. And the ones -- and some are abutting it	11:42:45
9	from the inside, meaning they were included in the	11:42:49
10	district, and others are abutting from the outside,	11:42:51
11	meaning they were excluded from the district,	11:42:55
12	correct?	11:42:57
13	A. Yes.	11:42:58
14	Q. So then why -- why would it not be fair	11:42:58
15	just to compare, you know, and to say that the	11:43:03
16	legislature could have incorporated Collier 134 with	11:43:05
17	a 86.7 HVAP but didn't do it and it did incorporate	11:43:13
18	part of Collier 12 with a 9.7 HVAP? You know, why	11:43:18
19	is that not a fair comparison?	11:43:24
20	A. I am not -- I was not tasked with drawing	11:43:27
21	new maps; I was tasked with assessing the current	11:43:29
22	map and looking at the shape of the current map.	11:43:33
23	Q. Okay. See, I don't think -- so. Okay.	11:43:37
24	So the only difference between your	11:43:40
25	analysis that is on my exhibit and the analysis that	11:43:42

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1	you did is that you limited your comparison to	11:43:44
2	contiguous VDT portions. So you compared only those	11:43:48
3	that were touching, correct, to each other?	11:43:53
4	A. That is correct.	11:43:56
5	Q. But wouldn't the same -- wouldn't it be	11:43:57
6	equally appropriate to look at the same precincts	11:44:01
7	that you identified in your table, whether they're	11:44:04
8	touching or not? I mean, isn't it the theory that	11:44:07
9	the legislature included some things and excluded	11:44:12
10	other things based on their HVAPs?	11:44:16
11	A. That was not the analysis that I was	11:44:20
12	doing. I was looking at the current shape of the	11:44:21
13	current enacted map and how the patterns manifested	11:44:23
14	themselves based on those lines that existed.	11:44:27
15	Q. Okay. But the legislature could have --	11:44:31
16	and when we were talking about Immokalee, you said	11:44:35
17	that if it was adjacent to the district, the	11:44:38
18	legislature could have incorporated it into the	11:44:41
19	district, if I remember correctly.	11:44:43
20	So by that same logic, the legislature	11:44:44
21	could have incorporated Collier 134 and Collier 71	11:44:49
22	into district 26, correct?	11:44:51
23	A. I don't remember the conversation about	11:44:54
24	Immokalee, but the precinct Collier 134 that is	11:44:56
25	split, the higher Hispanic voting-age population	11:45:00

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1 portion is not contained in CD 26. It is contained
2 in CD 18. So there are three precinct splits that I
3 have here on my Table 3 where the pattern does not
4 manifest itself.

5 But the vast majority of these precinct
6 splits are -- the higher portion of HVAP is included
7 in the -- on the district 26 side of this line.

8 Q. Right. But these portions that were
9 excluded, since they lie on the boundary of
10 district 26, could have been added to the district,
11 correct? There would be no contiguity issue --

12 ATTORNEY JONES: Objection to form.

13 That's a (Distorted audio).

14 A. The line would look different, the
15 boundary would look different, and there may be
16 reasons, particularly for popularization
17 equalization reasons, that those portions were not
18 included.

19 Q. All of that is true of your analysis, as
20 well, right? You know, if you have --

21 ATTORNEY BARDOS: Do we need a break?

22 THE WITNESS: I think the computer is
23 going to die. I don't know.

24 ATTORNEY BARDOS: Let me know if you --

25 ATTORNEY JONES: What does the power bar

11:45:05

11:45:08

11:45:13

11:45:17

11:45:18

11:45:21

11:45:27

11:45:33

11:45:37

11:45:40

11:45:43

11:45:51

11:45:51

11:45:52

11:45:57

11:45:58

11:45:58

11:46:00

11:46:01

11:46:03

11:46:08

11:46:11

11:46:12

11:46:18

11:46:22

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1	say?	11:46:23
2	THE WITNESS: I don't know. Yeah, there's	11:46:25
3	an exclamation point. There's an exclamation	11:46:27
4	mark on the laptop.	11:46:29
5	ATTORNEY JONES: All right.	11:46:33
6	Can we take a quick break and figure out	11:46:34
7	our business?	11:46:36
8	ATTORNEY BARDOS: Five minutes? Ten	11:46:37
9	minutes?	11:46:38
10	THE COURT REPORTER: The time is 11:46	11:46:44
11	EST, and we are off the record.	11:46:48
12	(Recess.)	11:46:51
13	THE COURT REPORTER: The time is 11:51	11:51:07
14	EST, and we are back on the record.	11:51:08
15	Q. Okay. Dr. Abbott, so I think before the	11:51:13
16	break, you mentioned there might be equal population	11:51:16
17	issues with incorporating some of these VTD	11:51:19
18	fragments on Exhibit 6.	11:51:22
19	But wouldn't that also be true of the VTD	11:51:26
20	fragments in your table, the contiguous ones?	11:51:31
21	A. I don't -- I don't see why, because the	11:51:38
22	splits that were included in district 26, generally	11:51:41
23	speaking, had higher HVAP.	11:51:45
24	There was a decision -- most of the	11:51:47
25	precincts in the redistricting in the enacted map	11:51:50

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1 were kept whole, but this table lists all of the 11:51:53
2 precincts that were not kept whole. And those that 11:51:58
3 were not kept whole, time and again, exhibited a 11:52:03
4 pattern in which the portions that were split and 11:52:06
5 given to CD 26 had higher HVAPs than those that were 11:52:09
6 excluded from CD 26. 11:52:13

7 Q. And you didn't examine alternative 11:52:17
8 explanations for why that might be the case? 11:52:18

9 A. I did not. 11:52:20

10 Q. And looking back at Exhibit 6 here, you 11:52:23
11 would agree, though, that the legislature -- that 11:52:26
12 there were VTD fragments along the boundary of 11:52:32
13 district 26 just outside of the district with HVAPs 11:52:35
14 of 84.6, 67.1 percent, 53.4 percent, 48.7 percent, 11:52:40
15 47.8 percent and 40.4 percent, just to name six 11:52:52
16 examples, correct? 11:52:58

17 A. Yes. 11:52:59

18 Q. And you would agree that there were VTD 11:52:59
19 fragments along the boundary of district 26, just 11:53:03
20 inside the district, with HVAPs of 9.7 percent, 11:53:06
21 11.6 percent, 12.7 percent, 23.3 percent, and 11:53:11
22 33.6 percent, to name five of them, correct? 11:53:18

23 A. Yes. 11:53:30

24 Q. Now, if we look back at your table, and I 11:53:30
25 will stop sharing my screen. If we look back at 11:53:32

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1	your table, would you agree that there are 13 rows	11:53:36
2	in Table 3? So you're assessing 13 VTDs?	11:53:39
3	A. Yes.	11:53:48
4	Q. Okay. And of those 13, five of them	11:53:48
5	concern VTDs that were split between CD 26 and	11:53:52
6	CD 24, which is the protected district for Black	11:53:56
7	voters?	11:54:01
8	A. Correct.	11:54:02
9	Q. Okay. And so if the legislature's	11:54:04
10	attempts to maintain the ability to elect for Black	11:54:07
11	voters in 24 had something to do with those splits,	11:54:10
12	that's not something you analyzed?	11:54:15
13	A. That's not something I had what, sorry?	11:54:17
14	Q. That's not something you analyzed, whether	11:54:19
15	the legislature's attempts to maintain district 24	11:54:22
16	as a district in which Black voters are able to	11:54:25
17	elect the candidates of their choice had something	11:54:28
18	to do with the way that those VTDs were split.	11:54:32
19	A. Correct.	11:54:35
20	Q. Okay. Let's look at Table 4. So my	11:54:43
21	understanding of the difference between your Table 3	11:54:45
22	and your Table 4 is: Table 3 lists VTDs that were	11:54:48
23	split along a boundary of CD 26, and -- I'm sorry,	11:54:52
24	Table 4 lists pairs of VTDs where they're	11:54:58
25	contiguous, one inside district 26, one outside of	11:55:04

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1	district 26; is that correct?	11:55:07
2	A. That is correct.	11:55:09
3	Q. Now, in Table 4, I won't ask you to count	11:55:11
4	all of the rows in the table, but -- I might run out	11:55:15
5	of time, but would you agree that there are some VTD	11:55:19
6	pairs in which the VTD that was excluded from the	11:55:26
7	district is in a county other than Collier and	11:55:30
8	Miami-Dade?	11:55:35
9	A. Yes.	11:55:39
10	Q. Okay. So there are VTDs where the	11:55:41
11	excluded VTD is in Broward County or Hendry County,	11:55:45
12	or as you clarified in your errata sheet, in Lee	11:55:53
13	County, correct?	11:55:57
14	A. So there are VTDs that are excluded from	11:55:58
15	district 26 in -- that do not include Collier and	11:56:03
16	Miami-Dade. I believe it's just Lee County and	11:56:07
17	Hendry County.	11:56:09
18	Q. And how about Broward?	11:56:12
19	A. So I think that was corrected in the	11:56:14
20	errata.	11:56:17
21	Q. I see. So it might -- tell me if I'm	11:56:18
22	mistaken here, but I think the first six rows that	11:56:21
23	say "Broward," those are the corrections, those are	11:56:24
24	the ones that should have been in Lee?	11:56:27
25	A. Yeah.	11:56:29

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1	Q. And then further down on down on the	11:56:29
2	table, there are VTDs in Broward that actually are	11:56:30
3	in Broward.	11:56:33
4	Is that your understanding?	11:56:36
5	A. Yes, but none of those are -- oh, yes --	11:56:38
6	yes, so those are -- those are from Broward County,	11:56:38
7	correct.	11:56:42
8	Q. Okay. So you did not analyze whether the	11:56:43
9	legislature's attempts to adhere to county	11:56:47
10	boundaries and not cross over into Lee County or	11:56:51
11	Broward County or Hendry County might have been the	11:56:55
12	reason why the excluded VTDs in Table 4 were not	11:57:00
13	included in district 26, correct?	11:57:03
14	A. I did not explicitly look at that, but I	11:57:06
15	did look at county splits, and the fact that the	11:57:08
16	Florida legislature did split counties when drawing	11:57:12
17	this map.	11:57:15
18	Q. Okay. And you're aware that, in every	11:57:17
19	map, including Dr. McCartan's maps, there will be	11:57:19
20	split counties, correct?	11:57:22
21	A. Correct.	11:57:24
22	Q. Okay. And are you aware that	11:57:25
23	Dr. McCartan's maps split at least as many counties	11:57:27
24	as the enacted map?	11:57:31
25	ATTORNEY JONES: Objection to form.	11:57:33

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1	A.	I did not count how many counties were	11:57:34
2		split.	11:57:36
3	Q.	Do you know whether Sarasota County, which	11:57:37
4		is, I think, two counties to the north from Collier	11:57:42
5		County, is whole in the enacted map but split in	11:57:45
6		every one of Dr. McCartan's maps?	11:57:48
7	A.	I did not look at that.	11:57:50
8	Q.	And you're not saying that it's more	11:57:51
9		important to keep Collier County whole than it is to	11:57:53
10		keep Sarasota County whole?	11:57:55
11	A.	I am not saying that.	11:57:58
12	Q.	Do you know whether the legislature	11:58:00
13		followed county boundaries from -- do you know	11:58:03
14		whether the legislature would have been able to	11:58:10
15		follow the western boundary of Broward, Palm Beach,	11:58:12
16		Martin, and St. Lucy counties and the northern	11:58:16
17		boundaries of St. Lucy County if it had not gone	11:58:19
18		over to Collier in CD 26?	11:58:23
19	A.	I do not know.	11:58:27
20	Q.	Do you know what the boundary analysis or	11:58:48
21		boundary score is in Florida?	11:58:51
22	A.	I do not.	11:58:54
23	Q.	Are you familiar with that? Okay.	11:58:56
24		Is it your position that there are more	11:59:02
25		congressional districts in Miami-Dade County than	11:59:04

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1	there have to be?	11:59:07
2	ATTORNEY JONES: Objection to form.	11:59:09
3	A. That is not my position.	11:59:10
4	Q. Okay. Now, in some of these pairings, the	11:59:13
5	HVAP in the included portion and the excluded	11:59:27
6	portion is quite similar. For example, Collier in	11:59:31
7	Table 2, Collier to the HVAP of the included portion	11:59:36
8	is 12.7 percent, and in the excluded portion it's	11:59:42
9	6.3 percent. In Collier 71, the included portion	11:59:46
10	has an HVAP of -- I'm sorry?	11:59:51
11	A. Which table are you looking at?	11:59:54
12	Q. I'm sorry, I'm sorry. Table 3.	11:59:55
13	A. Okay.	11:59:57
14	Q. Okay. So Table 3, the included portion of	12:00:01
15	Collier 2 has an HVAP of 12.7 percent, the excluded	12:00:05
16	portion has an HVAP of 6.3 percent. Collier 71, the	12:00:11
17	included portion has an HVAP of 67.5 percent, the	12:00:16
18	excluded portion has an HVAP of 67.1 percent.	12:00:20
19	Collier 79, the included portion has an HVAP of 11.6	12:00:26
20	percent, the excluded portion has an HVAP of	12:00:29
21	7.7 percent.	12:00:29
22	Do you think that those sorts of	12:00:32
23	differences between the HVAP of the included	12:00:34
24	district and the HVAP of the excluded district say	12:00:37
25	really anything about what the legislature was	12:00:39

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1	considering or what factors it was relying on in	12:00:43
2	drawing these districts?	12:00:47
3	ATTORNEY JONES: Objection to form.	12:00:48
4	A. I believe that the fact that one has a	12:00:51
5	greater composition of HVAP, a greater percentage of	12:00:54
6	HVAP suggests that, over and over again, the line	12:01:00
7	was drawn in a way that included those portions. I	12:01:02
8	can't speak to the size of those differences. Or	12:01:06
9	the fact that there were differences that do not	12:01:11
10	appear to be random or a result of chance because	12:01:14
11	they seem very consistent suggests to me, you know,	12:01:18
12	what I've concluded in my report.	12:01:23
13	Q. Okay. And so, it suggests to you that it	12:01:25
14	was not random but rather intentional, correct?	12:01:27
15	A. That it was not random.	12:01:32
16	Q. Is that different from saying that it was	12:01:36
17	intentional?	12:01:39
18	A. I just cannot speculate on the intentions	12:01:41
19	of the map drawers.	12:01:43
20	Q. Okay. When you say that race -- that your	12:01:45
21	analysis strongly suggests that race was a factor,	12:01:54
22	isn't that another way of saying that the	12:01:58
23	legislature intentionally used race to draw	12:02:00
24	districts?	12:02:02
25	A. I -- I cannot say what the subjective	12:02:05

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1 intentions of the map drawers were. I can say what 12:02:08
2 the map looks like. 12:02:11

3 Q. Okay. And so the fact that, for example, 12:02:13
4 Collier 71, the HVAP of the included portion is only 12:02:17
5 four-tenths of a percentage point higher than the 12:02:21
6 HVAP of the excluded portion, you would still see 12:02:23
7 that VTD as an indication that race was a factor in 12:02:26
8 drawing these districts? 12:02:32

9 A. Embedded in the larger patterns that we 12:02:35
10 are witnessing, yes. 12:02:38

11 Q. Now, in the -- in a number of these 12:02:46
12 tables, the included VTD -- and I'm talking as an 12:02:48
13 example now about Table 4 -- the included VTD is 12:02:55
14 often listed more than once, and I assume the reason 12:02:59
15 is that it is adjacent to more than one VTD that was 12:03:01
16 excluded from the district. 12:03:06

17 Is that -- is that the reason why it would 12:03:08
18 be listed more than once? 12:03:10

19 A. Yes, and there are excluded VTDs that are 12:03:11
20 also listed more than once. 12:03:13

21 Q. Right. And -- but each time it's 12:03:17
22 separately listed, that factors into your 12:03:20
23 probability analysis separately, correct? 12:03:25

24 A. Correct. 12:03:28

25 Q. Okay. Do you think it's the right way to 12:03:29

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1	calculate the possibility analysis to factor what is	12:03:34
2	basically one decision into that same analysis	12:03:39
3	multiple times?	12:03:42
4	ATTORNEY JONES: Objection to form.	12:03:44
5	A. I disagree that it's one decision --	12:03:45
6	Q. Okay.	12:03:48
7	A. -- because the line -- because there's a	12:03:49
8	different line that separates one precinct from	12:03:53
9	another, even if that precinct appears more than	12:03:55
10	once and touches that line more than once.	12:03:58
11	Q. Okay. So just to be clear, let's say	12:04:02
12	there's a VTD just inside the boundary, just inside	12:04:05
13	district 26. And on the other side, there are five	12:04:10
14	small VTDs that were excluded from the district that	12:04:14
15	are adjacent to the one that was included.	12:04:16
16	Your probability analysis would include	12:04:21
17	that inside VTD, the one that was included, it would	12:04:23
18	reflect that five times?	12:04:29
19	A. I -- I don't know what you mean by	12:04:32
20	"reflect," but it would be part of the calculation	12:04:34
21	five separate times, yes.	12:04:39
22	Q. Okay. And there's a fairly large number	12:04:42
23	of duplicate or even triplicate VTDs listed in these	12:04:47
24	tables, correct?	12:04:56
25	ATTORNEY JONES: Objection to form.	12:04:58

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1	A.	I don't know that it would be larger. I'm	12:04:59
2		not sure how you would quantify that -- or qualify	12:05:01
3		that.	12:05:04
4	Q.	So in table -- so in Table 4, Collier 120	12:05:04
5		is listed twice, and I'm just going through the	12:05:08
6		included VTDs. Collier 120 is listed twice, right?	12:05:10
7	A.	Correct.	12:05:15
8	Q.	Collier 57 is listed twice.	12:05:16
9	A.	Correct.	12:05:19
10	Q.	Miami-Dade 248.0 is listed twice, correct?	12:05:21
11	A.	Correct.	12:05:28
12	Q.	Miami-Dade 246 is listed twice?	12:05:30
13	A.	Yes.	12:05:32
14	Q.	Miami-Dade 314 is listed twice?	12:05:34
15	A.	Yes.	12:05:38
16	Q.	Miami-Dade 232 is listed three times?	12:05:39
17	A.	Yes.	12:05:42
18	Q.	Miami-Dade 201 is listed three times?	12:05:44
19	A.	Yes.	12:05:47
20	Q.	Miami-Dade 365 is listed three times?	12:05:49
21	A.	Yes.	12:05:52
22	Q.	Miami-Dade 369.0 is listed four times?	12:05:53
23	A.	Yes.	12:05:57
24	Q.	And Collier 122 is listed twice, correct?	12:05:59
25	A.	Yes.	12:06:03

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1	Q. Okay. Now, also, in these tables, you	12:06:03
2	don't list the number of voting-age Hispanics who	12:06:17
3	live in these VTD fragments or VTDs, correct?	12:06:22
4	A. That's correct, but I did add them in my	12:06:28
5	rebuttal report.	12:06:29
6	Q. Okay. If I remember correctly, your	12:06:33
7	rebuttal report includes the total voting-age	12:06:35
8	population and then the percentage HVAP percentage;	12:06:38
9	is that accurate?	12:06:41
10	A. Yes, and then you can infer the Hispanic	12:06:43
11	voting-age population from those two.	12:06:45
12	Q. You multiply. Yes.	12:06:48
13	And so some of those VTD fragments or VTDs	12:06:50
14	have a relatively small number of people in them,	12:06:54
15	correct?	12:06:56
16	ATTORNEY JONES: Objection to form.	12:06:57
17	A. I don't know what you mean by "relatively	12:07:00
18	small number of people."	12:07:02
19	Q. Well, if, let's say, Collier 79 has -- a	12:07:04
20	portion of Collier 79 that was included in the	12:07:06
21	district has 23 voting-age Hispanics, would you	12:07:10
22	consider that significant in the context of a	12:07:15
23	congressional district?	12:07:17
24	A. So if we're referring to Table 3, Table 3	12:07:20
25	excludes portions of precincts that have less than	12:07:24

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1	100 total VAP.	12:07:28
2	Q. But if only -- but if one side of the VTD	12:07:33
3	has more than 100, then it would be included even if	12:07:37
4	the other side doesn't, correct?	12:07:38
5	A. I don't believe so. Not in this table.	12:07:40
6	Certainly not in Table 4, but I don't think in	12:07:43
7	Table 3 either.	12:07:47
8	Q. Okay. So is it your position, then, in	12:07:47
9	all of your VTD analyses, you excluded all VTDs in	12:07:51
10	which one side had more than 100 but the other side	12:07:54
11	had fewer than 100?	12:08:02
12	A. The initial report, if any contiguous side	12:08:04
13	had less than 100 total VAP, they were not included	12:08:06
14	in the table.	12:08:09
15	Q. Did it have to be -- okay. If either --	12:08:10
16	if either side had less than 100, it was not	12:08:14
17	included?	12:08:17
18	A. Correct.	12:08:17
19	Q. Are you sure about that?	12:08:19
20	A. I'm definitely sure about that for	12:08:20
21	Table 4. I'm not positive about that for Table 3,	12:08:22
22	but you can compare Table 3 to the split precincts	12:08:26
23	in my rebuttal report where I include all portions.	12:08:29
24	Q. Okay. All right. Let me show you	12:08:33
25	another --	12:08:51

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1	ATTORNEY BARDOS: And before we go on,	12:08:52
2	when does everyone want to break for lunch?	12:08:54
3	I'm flexible, but I -- you know, I can do it at	12:08:56
4	any time.	12:08:59
5	THE WITNESS: 12:30 -- is that okay?	12:09:05
6	ATTORNEY BARDOS: 12:30?	12:09:09
7	THE WITNESS: I don't care.	12:09:10
8	ATTORNEY BARDOS: Patrick, do you have a	12:09:11
9	preference?	12:09:12
10	ATTORNEY JONES: I don't have a	12:09:12
11	preference. I mean, if you're going to start	12:09:13
12	on a line of questioning, that's -- it kind of	12:09:14
13	depends on what your plans are.	12:09:19
14	ATTORNEY BARDOS: I might -- I'm sorry. I	12:09:22
15	might have maybe just five or ten minutes on	12:09:24
16	the VTD splits for congressional, and then	12:09:26
17	maybe that would be a good time?	12:09:28
18	ATTORNEY JONES: Okay.	12:09:30
19	ATTORNEY BARDOS: Okay.	12:09:32
20	Let me display another table here. This	12:09:36
21	is Exhibit 7. And what I've done here is	12:09:45
22	similar to what I did with Table 3.	12:09:51
23	(Plaintiffs' Exhibit No. 7 was	12:09:54
24	marked for identification.)	12:09:54
25	ATTORNEY BARDOS: And I will try to add it	12:10:13

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1	to the chat. Okay.	12:10:15
2	Q. Okay. All right. So, Dr. Abbott, are you	12:10:22
3	able to see Exhibit 7?	12:10:25
4	A. Yes.	12:10:27
5	Q. And what I did here, just as I did with	12:10:28
6	the other table, is I took the information that was	12:10:31
7	in your Table 4, and I sorted the included VTDs from	12:10:33
8	highest HVAP to lowest HVAP, and then separately	12:10:38
9	sorted the excluded VTDs from highest HVAP to lowest	12:10:42
10	HVAP.	12:10:46
11	And so would you agree with me that the	12:10:47
12	legislature included in district 26, VTDs with HVAPs	12:10:52
13	of -- and these are all along the border of 26, VTDs	12:10:57
14	with HVAPs of 3.1, 4.1, 4.8, 5.1, 5.3, 10.0, 10.7,	12:11:03
15	13.6, 17.6, 26.7 percent HVAPs?	12:11:15
16	A. Let me take a second to confirm.	12:11:27
17	What was the last one?	12:11:42
18	How high did you go?	12:11:44
19	Q. I went up to, I believe, 26.7 percent.	12:11:46
20	A. Yes, that's correct.	12:11:51
21	Q. Okay. And would you also agree that the	12:11:51
22	legislature excluded from district 26, VTDs that are	12:11:54
23	touching the border of the district with HVAPs of	12:11:58
24	70.8 percent, 70.1 percent, 60.5 percent, 68.5	12:12:03
25	percent, 66.4 percent 65.1 percent,	12:12:09

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1	58.8 percent, 58.0 percent, 57.1 percent, 56.3	12:12:15
2	percent, and it goes on, but I'll just give those as	12:12:21
3	examples.	12:12:27
4	Is that accurate?	12:12:29
5	A. That is accurate.	12:12:55
6	Q. Okay. And is there any reason that you're	12:12:56
7	aware of why the legislature would have included	12:13:00
8	VTDs with such low HVAPs, as we just discussed,	12:13:03
9	or -- and at the same time, excluded VTDs with such	12:13:08
10	high HVAPs, as we discussed?	12:13:13
11	A. Well, as I have mentioned before, race may	12:13:15
12	not have been the sole or only consideration there	12:13:19
13	in redistricting their other constraints that all	12:13:24
14	mapmakers have to contend with.	12:13:29
15	Q. Okay. All right. That is it for this	12:13:31
16	exhibit.	12:13:36
17	Now, in your analyses of split VTDs,	12:13:40
18	Tables 3 and 4, is your -- is the assumption behind	12:13:43
19	this split VTD analysis, that if -- if everything	12:13:49
20	had been done randomly, it would be an approximately	12:13:55
21	kind of 50-50, or proportional, split between those	12:13:59
22	VTDs that are included and those that are excluded?	12:14:03
23	ATTORNEY JONES: Objection to form.	12:14:07
24	A. Can you repeat the question?	12:14:10
25	Q. Sure. So is the -- in this split VTD	12:14:11

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1	analysis that you did, is the assumption that if	12:14:16
2	map-drawing is done randomly, or without regard to	12:14:19
3	race, that the HVAPs of the included VTDs would be	12:14:24
4	the same as the HVAPs of the excluded VTDs?	12:14:31
5	A. No, not the same.	12:14:36
6	Q. Okay. Why not?	12:14:38
7	A. I never make that claim. The claim is	12:14:40
8	that half of the time, the districts included on one	12:14:44
9	side of the boundary line should have greater HVAP	12:14:46
10	than the contiguous districts in the other side of	12:14:49
11	the line, and half the time, they should have lower	12:14:52
12	HVAPs than the precincts on the other lines are	12:14:55
13	split.	12:15:03
14	Q. Okay. Thank you for that clarification.	12:15:04
15	Did you do anything to determine how the	12:15:06
16	HVAP of congressional district 26 would be impacted	12:15:10
17	if the VTDs that were -- that you've identified in	12:15:13
18	Tables 3 and 4, were split the way that you just	12:15:16
19	described as opposed to the way that they were	12:15:19
20	actually split?	12:15:21
21	A. Can you repeat the question?	12:15:25
22	Q. Sure. Did you do any analysis to	12:15:27
23	determine how the HVAP of district 26 would have	12:15:29
24	been impacted if the VTDs that you've identified in	12:15:34
25	Tables 3 and 4 had been split in the manner that you	12:15:39

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1	just described as opposed to the way in which they	12:15:42
2	were actually split?	12:15:44
3	A. No, that would have been drawing a new	12:15:46
4	map. That would have required me to draw a map.	12:15:48
5	Q. Okay. So you don't know whether the HVAP	12:15:52
6	would have changed by 1 percent or 10 percent or	12:15:54
7	some other figure?	12:15:58
8	A. The overall district 26 comes in -- no, I	12:16:01
9	don't know the answer to that question.	12:16:04
10	Q. Okay. And, in fact, you didn't analyze	12:16:10
11	whether the HVAP would have decreased at all,	12:16:21
12	correct?	12:16:23
13	ATTORNEY JONES: Objection to form.	12:16:24
14	A. I did not look at any new maps and how	12:16:27
15	they would have affected the composition of HVAP in	12:16:31
16	the districts.	12:16:33
17	Q. And, in theory, the -- let's move on.	12:16:35
18	I'm not going to do well with that	12:16:47
19	question. All right. Let's turn to paragraph 26,	12:16:48
20	Figure 2. Okay. And here, you have a -- in	12:16:54
21	figure 2 -- you have a map that depicts in, I guess	12:17:09
22	brown where there's larger concentrations of HVAP,	12:17:16
23	and would the blue be -- what is the blue? What	12:17:20
24	does the blue represent?	12:17:26
25	A. It's lower concentrations of HVAP.	12:17:28

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1	Q.	Okay. And -- and I think that -- I think	12:17:30
2		the point that you make here, tell me if I'm wrong,	12:17:33
3		is that the boundary of district 26 follows the --	12:17:35
4		the boundary between higher and lower-concentration	12:17:41
5		HVAP areas, correct?	12:17:48
6	A.	Correct.	12:17:50
7	Q.	And so along the northern district, the	12:17:51
8		northern boundary of district 26, we see that south	12:17:54
9		of the boundary, it's -- there's brown color and	12:17:56
10		north of the boundary, it's more of a white and more	12:17:58
11		blue, correct?	12:18:02
12	A.	(No verbal response.)	12:18:06
13	Q.	Do you know whether that boundary, that	12:18:08
14		northern boundary, of 26 that's pictured in	12:18:10
15		Figure 2, is also the boundary between Miami-Dade	12:18:14
16		and Broward Counties?	12:18:19
17	A.	I do not know for sure.	12:18:21
18	Q.	If it is, could that be an explanation for	12:18:22
19		why the legislature put the boundary there -- the	12:18:24
20		boundary of district 26 there?	12:18:27
21	A.	Not necessarily. Other counties are	12:18:30
22		split. I don't see any reason why Broward County is	12:18:34
23		more important than the other counties that were	12:18:38
24		split.	12:18:40
25	Q.	Okay. Do you have any reason to -- are	12:18:41

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1	you able to rule out that possibility? Are you	12:18:43
2	saying that you know that to not be the case?	12:18:46
3	A. I'm saying I don't have any evidence to	12:18:49
4	suggest that the geographical or political	12:18:51
5	boundaries of counties were respected more than	12:18:55
6	anything else in the drawing of the maps when we	12:18:59
7	know that multiple counties were split in the	12:19:02
8	drawing of the enacted map.	12:19:05
9	Q. Okay. Did you look at the congressional	12:19:08
10	map to see whether districts follow county	12:19:09
11	boundaries?	12:19:11
12	A. I -- I did a county analysis. I looked at	12:19:13
13	Collier County and Miami-Dade County, and that they	12:19:18
14	were split across district boundaries.	12:19:21
15	Q. Okay. Did you see throughout South	12:19:24
16	Florida, that congressional districts follow --	12:19:26
17	follow county boundaries?	12:19:31
18	ATTORNEY JONES: Objection to form.	12:19:33
19	A. No, the only county analysis I did was	12:19:35
20	what I just referenced.	12:19:38
21	Q. Okay. So you didn't examine whether	12:19:40
22	county boundaries -- to what extent congressional	12:19:42
23	district boundaries in South Florida follow county	12:19:45
24	boundaries?	12:19:48
25	A. I did not count the number of splits of	12:19:48

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1	counties.	12:19:51
2	Q. Okay. And I'm not talking necessarily	12:19:51
3	about splits, but I'm talking about the boundary of	12:19:53
4	the district coinciding with county boundaries. I	12:19:56
5	mean, tracking the boundary line --	12:20:00
6	A. I did not.	12:20:03
7	Q. I'm sorry?	12:20:04
8	A. I did not look at that explicitly.	12:20:05
9	Q. Okay. And so you don't know whether it	12:20:06
10	was a priority for the legislature to follow county	12:20:10
11	boundaries in -- in drawing district boundaries?	12:20:14
12	A. All I know is that they -- sometimes the	12:20:19
13	counties were split.	12:20:22
14	Q. Right. And we've agreed that sometimes	12:20:24
15	counties will be split in any map, correct?	12:20:27
16	ATTORNEY JONES: Objection to form.	12:20:30
17	A. I believe so.	12:20:37
18	Q. And then the boundary on the east side of	12:20:38
19	congressional district 26, the area west of it is a	12:20:40
20	brownish color and the area east of it is mostly a	12:20:49
21	bluish or a whitish color. Would you agree with	12:20:53
22	that?	12:20:56
23	A. I would agree with that?	12:20:57
24	Q. And did you examine or consider any	12:20:58
25	alternative explanations for why that boundary was	12:21:00

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1	drawn where it was drawn?	12:21:02
2	A. Nothing in particular.	12:21:04
3	Q. Okay. Did you consider whether, because	12:21:05
4	district 24, as we've discussed earlier, is a	12:21:09
5	district in which the Black voters have the ability	12:21:13
6	to elect the candidates of their choice, whether	12:21:17
7	that contributed to the lower -- the legislature	12:21:20
8	drawing in that district to include lesser Hispanic	12:21:24
9	concentrations?	12:21:28
10	A. No, but just because a district is	12:21:29
11	protected doesn't mean that the boundary can't	12:21:34
12	change.	12:21:37
13	Q. Right. But did you consider whether the	12:21:37
14	legislature's attempts to draw district 24 as a	12:21:40
15	district in which Black voters are able to elect	12:21:43
16	their candidates of choice might have impacted the	12:21:47
17	placement of that boundary between 24 and 26?	12:21:52
18	A. I did not do an analysis of district 24.	12:21:56
19	Q. Okay. Finally, before -- before lunch,	12:21:59
20	let's cover the probability analysis. I think we	12:22:12
21	can do this pretty quickly. And this is	12:22:15
22	paragraphs 27 through 29 of your report.	12:22:17
23	And you say here that:	12:22:21
24	"44 of the 56" -- I'm sorry, I'm reading	12:22:24
25	at the end of paragraph 27. The last	12:22:28

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1	sentence. "44 of the 56 neighboring	12:22:31
2	pairs have a higher HVAP inside the	12:22:34
3	district 26 side of the boundary."	12:22:37
4	Did I read that correctly?	12:22:41
5	A. Yes.	12:22:42
6	Q. Okay. And that 44 out of 56, the	12:22:42
7	denominator there includes every row in Tables 3	12:22:48
8	and 4, correct?	12:22:52
9	A. Yes.	12:22:54
10	Q. And that would be true even if -- even	12:22:56
11	where the included VTD or the included VTD fragment	12:22:59
12	is listed more than once in the table?	12:23:03
13	A. Yes.	12:23:06
14	Q. And it would include those rows where the	12:23:07
15	excluded VTD or the excluded VTD fragment is in	12:23:10
16	district 24, a protected district for Black voters,	12:23:15
17	correct?	12:23:19
18	A. Correct.	12:23:20
19	Q. And it would also include every row in	12:23:21
20	which the excluded VTD or the excluded VTD fragment	12:23:23
21	is in Lee County or Hendry County or Broward County,	12:23:27
22	a county that is not included in district 26,	12:23:32
23	correct?	12:23:36
24	A. Correct.	12:23:37
25	Q. Okay. And so if -- if those -- if the	12:23:38

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1	cross-county pairings were excluded from the	12:23:47
2	probability analysis, and if the district 24 VTDs or	12:23:51
3	VTD fragments were excluded from the analysis, then	12:24:00
4	the probability analysis would look different,	12:24:02
5	correct?	12:24:04
6	A. I can't --	12:24:07
7	ATTORNEY JONES: Objection to form.	12:24:08
8	A. I can't say for sure.	12:24:09
9	Q. Well, if you're excluding rows, then it	12:24:11
10	won't be 44 out of 56 anymore.	12:24:12
11	A. The denominator and the numerator would	12:24:16
12	both be different.	12:24:19
13	Q. Yes. Okay.	12:24:21
14	ATTORNEY BARDOS: That is all the	12:24:24
15	questions I have for now, and when do we want	12:24:25
16	to reconvene?	12:24:28
17	ATTORNEY JONES: Do you want to do an hour	12:24:35
18	and 45 minutes?	12:24:36
19	THE WITNESS: I mean, we have to leave to	12:24:40
20	get food.	12:24:41
21	ATTORNEY JONES: We have to to go out,	12:24:42
22	so...	12:24:44
23	ATTORNEY BARDOS: I'm flexible.	12:24:45
24	ATTORNEY JONES: One hour?	12:24:47
25	ATTORNEY BARDOS: You would say 1:30?	12:24:48

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1	ATTORNEY JONES: Yeah, that's fine.	12:24:51
2	ATTORNEY BARDOS: Okay. 1:30 it is.	12:24:52
3	Thanks, everyone.	12:24:53
4	THE COURT REPORTER: The time is 12:24	12:25:02
5	Eastern, and we are off the record.	12:25:06
6	(Luncheon Recess.)	12:25:10
7	THE COURT REPORTER: Okay. The time is	13:35:10
8	now 13:35 Eastern, and we are back on the	13:35:12
9	record.	13:35:17
10	Q. Okay. Dr. Abbott, welcome back. I'd like	13:35:21
11	to ask you next about the portion of your report	13:35:24
12	where you discussed the candidate of choice,	13:35:26
13	Hispanic candidate of choice, in the congressional	13:35:30
14	districts. And I'd like to begin with paragraph 6	13:35:32
15	of your report, the initial report.	13:35:36
16	In paragraph 6, it states in part that	13:35:46
17	counsel instructed me to assume that the Hispanic	13:35:49
18	candidate of choice is likely to prevail when a	13:35:52
19	district leans Republican.	13:35:56
20	Do you see that?	13:35:58
21	A. Yes.	13:35:59
22	Q. Did counsel explain to you why you should	13:36:00
23	make that assumption?	13:36:02
24	ATTORNEY JONES: I'm just going to caution	13:36:09
25	the witness not to reveal contents of	13:36:09

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1	communications with counsel about the	13:36:13
2	assumption.	13:36:17
3	If you have an understanding of why -- why	13:36:18
4	we asked you to make the assumption that was,	13:36:23
5	you know, not communicated to you by us, then	13:36:26
6	you can answer.	13:36:29
7	ATTORNEY BARDOS: I do think that,	13:36:32
8	Patrick, that if she's disclosing a	13:36:33
9	communication from counsel, that I can ask	13:36:34
10	about that communication and explore it. So I	13:36:37
11	think that I can ask the question that I asked,	13:36:43
12	and that she should provide a question even if	13:36:44
13	it's based on communications with counsel.	13:36:49
14	ATTORNEY JONES: Can you just restate the	13:36:54
15	question again?	13:36:55
16	ATTORNEY BARDOS: Sure.	13:36:56
17	Q. So the statement is, counsel instructed me	13:36:57
18	to assume the Hispanic candidate of choice is likely	13:36:59
19	to prevail when a district leans Republican, and the	13:37:01
20	question is: Did counsel explain why you should	13:37:04
21	make that assumption?	13:37:07
22	ATTORNEY JONES: And we're talking about	13:37:10
23	the communication in which we, counsel,	13:37:10
24	provided the assumption?	13:37:13
25	ATTORNEY BARDOS: Yes.	13:37:15

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1	ATTORNEY JONES: Okay. Yeah, so if it's	13:37:17
2	limited to the communication in which counsel	13:37:18
3	provided you the assumption, he can ask you	13:37:20
4	about that communication.	13:37:22
5	A. The answer is no.	13:37:27
6	Q. Okay. And do you have an opinion, one way	13:37:28
7	or another, about whether the Hispanic candidate --	13:37:31
8	candidate of choice is likely to prevail when a	13:37:35
9	district leans Republican?	13:37:37
10	A. What do you -- what do you mean by that?	13:37:41
11	Q. So you were asked to assume that the	13:37:46
12	Hispanic candidate of choice is likely to prevail	13:37:48
13	when a district leans Republican.	13:37:50
14	Separate from that assumption, and from	13:37:53
15	being asked to make that assumption, do you have an	13:37:54
16	opinion as to whether that assumption is true or not	13:37:56
17	correct?	13:37:59
18	A. No.	13:38:00
19	Q. Okay. Let's go to paragraph 30 of your	13:38:01
20	initial report, then. And take a look at Table 5.	13:38:06
21	What -- what do you infer from Table 5?	13:38:21
22	A. On page 30, I'm looking at Table 13.	13:38:25
23	Q. I'm sorry. Paragraph 30, which ends on	13:38:28
24	page 18. My mistake. Table 5.	13:38:33
25	A. Can you repeat the question?	13:38:42

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1 Q. So Table 5, what do you infer or conclude 13:38:43
2 from Table 5? 13:38:47

3 A. Table 5, I can infer that the Hispanic 13:38:50
4 protected districts, 26, 27, 28, tended to lean 13:38:55
5 republican in three recent elections, particularly 13:39:01
6 the most recent election here. President 2020. 13:39:06

7 Q. Okay. Now isn't it true that in the nine 13:39:11
8 cells within this table, three elections times three 13:39:18
9 districts, the democratic candidate received more 13:39:22
10 votes than the republican candidate in five of the 13:39:26
11 nine? 13:39:30

12 A. I don't have the democratic vote share 13:39:31
13 here, but you said in five of them? 13:39:33

14 Q. Yes. 13:39:36

15 A. Yeah, I don't have the democratic vote 13:39:37
16 share here, but it's probably safe to assume that, 13:39:39
17 certainly, in elections where the district has less 13:39:43
18 than 40 percent for the republican candidate, then 13:39:49
19 the democratic candidate had more -- more votes. 13:39:51

20 Q. Did you -- I think you said less than 13:39:57
21 40 percent. 13:39:59

22 Do you mean less than 50 percent? 13:40:00

23 A. No, I meant lessen 40 percent because 13:40:03
24 there's a possibility there was more than -- it 13:40:05
25 wasn't a two-party race, there could have been a 13:40:07

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1 third candidate or a fourth candidate. 13:40:10

2 Q. Okay. So you're inferring from this 13:40:12

3 Table 5, that the districts performed for Republican 13:40:16

4 candidates, but you can't tell me whether Democrats 13:40:20

5 or Republicans won the elections in these particular 13:40:23

6 races? 13:40:27

7 A. In those districts, I don't have the 13:40:28

8 results written down here, no. 13:40:33

9 Q. And you would agree with me that, 13:40:35

10 recognizing that this is not limited to the 13:40:36

11 two-party vote share but it includes potentially 13:40:39

12 third parties or write-ins, you would agree with me 13:40:41

13 that the republican vote share was less 13:40:45

14 than 50 percent in six of the nine cells in this 13:40:47

15 table, correct? 13:40:51

16 A. That is correct. 13:40:52

17 Q. Okay. And so why would you infer from 13:40:54

18 this table that these districts would perform for 13:40:59

19 Republican candidates? 13:41:05

20 A. Well, certainly the most recent election 13:41:06

21 has pretty good evidence -- you know, two out of 13:41:07

22 three of the elections -- of the districts went 13:41:12

23 over 50 percent for the Republican candidate. 13:41:15

24 The third was very close to 50 percent. I 13:41:17

25 presume that the Republican candidate got more votes 13:41:21

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1	than the Democratic candidate in that election.	13:41:24
2	And, over time, the districts have become	13:41:28
3	voted more in favor the Republican candidate, from	13:41:33
4	2016 to 2020.	13:41:40
5	Q. Do you know whether, over time, Miami-Dade	13:41:41
6	as a whole has voted more for Republicans?	13:41:43
7	A. I do not know.	13:41:47
8	Q. Do you know whether district 26 in	13:41:54
9	Dr. McCartan's maps is more Republican than it is in	13:41:57
10	the enacted map?	13:42:00
11	ATTORNEY JONES: I'm just going to object	13:42:04
12	to form.	13:42:06
13	A. It looks like it is, according to Table 6,	13:42:11
14	except for in map B2.	13:42:13
15	Q. So in five of the six maps that	13:42:21
16	Dr. McCartan drew, district 26 is more Republican	13:42:23
17	than it is in the enacted district 26?	13:42:28
18	A. Correct.	13:42:30
19	Q. Okay. Now in paragraph 31 of your report,	13:42:31
20	you say that in the second -- third sentence that:	13:42:38
21	"District 26 avoids heavily Democratic	13:42:44
22	areas assigned to district 24 with	13:42:49
23	near-surgical precision."	13:42:52
24	And I'm wondering whether you assessed	13:42:56
25	whether that could be because district 24 was	13:42:58

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1 drawn to protect the ability of African-American 13:43:02
2 voters to elect the candidates of their choice, 13:43:05
3 and whether African-American voters in that 13:43:08
4 district prefer Democratic candidates. 13:43:11

5 A. I didn't analyze district 24 by itself, 13:43:14
6 but there's no reason that the boundary cannot 13:43:17
7 change simply because the district is protected. 13:43:19

8 Q. Okay. Would you agree that, if the 13:43:23
9 legislature was under requirement to maintain 13:43:35
10 district 24 as a district that protects the ability 13:43:38
11 to elect of Black voters, that that would be a 13:43:42
12 constraint on how the boundaries of that district 13:43:48
13 could be drawn? 13:43:50

14 A. It would be a constraint on the overall 13:43:53
15 composition of the district. 13:43:55

16 Q. Okay. Which, in turn, would be a 13:43:59
17 constraint on the district boundaries? 13:44:01

18 A. Not necessarily. 13:44:03

19 Q. So if there has to be a particular 13:44:03
20 composition within that district, you could still 13:44:05
21 draw the boundaries unconstrained by any -- by that 13:44:08
22 factor? 13:44:14

23 A. You would have to draw them so that the 13:44:15
24 composition of the district complied with the need 13:44:17
25 to protect the ability of Black voters to elect a 13:44:21

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1	candidate of their choice.	13:44:25
2	Q. In that same paragraph, you mentioned that	13:44:28
3	district 26 in the enacted map includes mostly	13:44:33
4	Republican areas of Collier County in addition to	13:44:38
5	more Democratic but sparsely populated areas around	13:44:41
6	Immokalee.	13:44:46
7	Do you see that?	13:44:47
8	A. I do that see that.	13:44:48
9	Q. Okay. And if you look at Table 3, would	13:44:49
10	you agree that, at least in terms of area,	13:44:52
11	district 26 includes most of the Democratic areas of	13:44:56
12	Collier County.	13:44:59
13	A. Are you referring to Figure 3?	13:45:02
14	Q. I'm sorry, yes. I don't even know what I	13:45:03
15	said. Thank you.	13:45:05
16	A. "Table 3."	13:45:06
17	Can you ask the question again, please?	13:45:08
18	Q. If you look at Figure 3, would you agree	13:45:11
19	that, at least in terms of area, district 26	13:45:13
20	includes most of the Democratic areas of Collier	13:45:16
21	County?	13:45:19
22	A. I don't -- the Collier County's boundaries	13:45:21
23	are not on this map.	13:45:24
24	Q. Fair enough.	13:45:31
25	Would you agree that it includes most of	13:45:36

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1	the blue portions on the -- on the left side of the	13:45:37
2	map?	13:45:43
3	ATTORNEY JONES: Objection to form.	13:45:47
4	Q. Let me rephrase: Would you agree that, in	13:45:49
5	terms of area, district 26 includes most of the blue	13:45:51
6	area on the left side of the map?	13:45:56
7	A. Yes, there's a portion, a dark-blue	13:45:58
8	portion, that is north of the boundary of	13:46:01
9	district 26, that has a smaller portion.	13:46:05
10	Q. Okay. Let's move on to the statehouse	13:46:09
11	districts, so beginning with paragraph 35. And	13:46:12
12	here, you have Table 7, and it lists the Hispanic	13:46:19
13	voting-age population of districts -- statehouse	13:46:24
14	districts in South Florida, beginning with	13:46:30
15	district 103 and going through 120, most of the	13:46:33
16	districts in that range.	13:46:38
17	Is this just for background information,	13:46:41
18	or are you inferring or concluding something from	13:46:43
19	Table 7?	13:46:46
20	A. This is primarily for background	13:46:48
21	information.	13:46:49
22	Q. Okay. Next paragraph. Paragraph 36, you	13:46:50
23	say that you're examining the distribution of	13:46:57
24	Hispanic populations within the Hispanic-protected	13:47:00
25	districts. And you note in the middle of that	13:47:04

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1	paragraph on page 22 that:	13:47:10
2	"Adjacent Hispanic-protected districts	13:47:14
3	exhibit similar Hispanic VAP, including	13:47:18
4	113 and 114, 2.6 percentage point	13:47:21
5	difference and 116, 118, and 119, 2.2	13:47:26
6	percentage point difference."	13:47:32
7	why wouldn't adjacent districts have similar	13:47:37
8	Hispanic voting-age populations?	13:47:40
9	A. This goes back to the same argument that I	13:47:42
10	made about the congressional districts, that if	13:47:44
11	these were drawn -- if these districts were drawn	13:47:47
12	without considering race in an area where there's a	13:47:50
13	lot of racial variation, you would be very surprised	13:47:52
14	to see such consistent patterns of Hispanic VAP in	13:47:56
15	these districts.	13:48:02
16	Q. And did you -- is there -- and so I'm	13:48:04
17	assuming that what you're saying is that even at the	13:48:08
18	level of a statehouse district, which is	13:48:11
19	approximately 170- to 180,000 people, even at that	13:48:13
20	level, you're saying that there's significant	13:48:21
21	variation across the -- across Miami-Dade County?	13:48:24
22	A. I'm saying there is not significant	13:48:26
23	variation in the Hispanic-protected districts the	13:48:28
24	way that they are drawn in the enacted map, but	13:48:31
25	within the area in South Florida that all of these	13:48:34

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1	districts are covering, there is significant	13:48:37
2	demographic variation.	13:48:40
3	Q. Okay. What about map A2 that Dr. McCartan	13:48:44
4	produced.	13:48:51
5	Do you have available to you the Hispanic	13:48:53
6	voting-age population of the districts in that map?	13:48:55
7	A. In Table 8?	13:48:58
8	Q. Yeah, that'll do it. There it is.	13:49:02
9	So would you agree that districts 113	13:49:05
10	and 114 in Dr. McCartan's map A2 have very similar	13:49:08
11	HVAPs?	13:49:13
12	A. They are similar.	13:49:17
13	Q. So 73.0 and 72.4?	13:49:18
14	A. They are similar.	13:49:23
15	Q. Okay. And would you agree that in that	13:49:25
16	same map, districts 116 and 118 have similar HVAPs?	13:49:27
17	A. To one another or to the enacted map, are	13:49:33
18	you talking about?	13:49:36
19	Q. To one another, to 116 and 118.	13:49:38
20	A. They are separated by 1.2 percentage	13:49:41
21	points.	13:49:44
22	Q. Okay. And so, do you draw any conclusions	13:49:44
23	from the fact that his map also -- map A2 contains	13:49:51
24	adjacent districts with similar HVAPs?	13:49:59
25	A. I don't draw any conclusions from those	13:50:01

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1 particular examples, but if you look at all of his 13:50:04
2 maps and the range of all of the Hispanic-protected 13:50:07
3 districts, there are greater ranges across all of 13:50:10
4 the Hispanic-protected districts compared to the 13:50:13
5 enacted map. 13:50:16

6 Q. Okay. But you agree, then, that 13:50:17
7 drawing -- that it is possible, even when drawing 13:50:20
8 without regard to race as Dr. McCartan purportedly 13:50:24
9 did, to come up with adjacent districts with very 13:50:28
10 similar HVAPs. 13:50:33

11 A. It depends on what you define as "vary." 13:50:35
12 But they are, generally speaking, the 13:50:38
13 range lower than the enacted map -- I mean, sorry, 13:50:41
14 the range is higher than the enacted map. 13:50:44

15 Q. Okay. I'm just talking about the adjacent 13:50:47
16 districts. 13:50:49

17 So in paragraph 36, you identified a 2.6 13:50:49
18 percentage-point difference between enacted 113 and 13:50:54
19 114 and a 2.2 percentage point difference between 13:50:59
20 enacted districts 116, 118, and 119. 13:51:03

21 And I'm looking at Dr. McCartan's map, and 13:51:08
22 his range is between 113 and 114, and then 13:51:11
23 separately, between 118 and 119, are even less. 13:51:14

24 Would you agree with that? 13:51:19

25 ATTORNEY JONES: Objection to form. 13:51:22

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1	A.	The range between 113 and 114 in A2 is	13:51:24
2		lower. The range between 116 and 118 and 119 is not	13:51:28
3		lower.	13:51:34
4	Q.	No, I'm not -- I'm just talking about 116	13:51:36
5		and 118.	13:51:39
6	A.	But in my paragraph 36, I say 116, 118,	13:51:40
7		and 119.	13:51:47
8	Q.	In my question, I'm just identifying	13:51:48
9		adjacent districts. And so I'm looking at 113 and	13:51:50
10		114, and you said that's lower. What about 116 and	13:51:53
11		118?	13:51:57
12	A.	The difference between 116 and 118 in A2	13:52:06
13		is lower than the difference between 116 and 118 in	13:52:08
14		the enacted map. But, again, that's not what I	13:52:09
15		reference in paragraph 36.	13:52:12
16	Q.	Maybe so. But would you agree, then, that	13:52:15
17		it would be possible to be drawing districts race	13:52:17
18		blind and come up with adjacent districts with	13:52:20
19		similar HVAPs?	13:52:23
20	A.	It depends on the overall demography of	13:52:24
21		the region, but yes.	13:52:27
22	Q.	Okay. I mean, Dr. McCartan did it in A2,	13:52:28
23		and you would agree with that, right?	13:52:32
24	A.	For those two examples, yes.	13:52:35
25	Q.	Right. So it is possible, correct?	13:52:37

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1	A.	It is possible.	13:52:39
2	Q.	He has demonstrated that it is possible.	13:52:40
3	A.	Possible to? To do what exactly?	13:52:42
4	Q.	To draw districts without regard to race	13:52:47
5		and have similar HVAPs in adjacent districts.	13:52:51
6	A.	Yes.	13:52:56
7	Q.	Okay.	13:52:57
8	A.	Depending on the demographic region, the	13:52:58
9		demographic variation in the region.	13:53:01
10	Q.	Okay. And we're talking about the same	13:53:05
11		region here in his map as in the enacted map, right?	13:53:07
12		I mean, these districts that -- his districts 113,	13:53:14
13		and 114, and 116, and 118 are within the same region	13:53:18
14		where the challenge districts are in the enacted	13:53:22
15		map, right?	13:53:26
16	A.	Yes, but we're talking about, now, just	13:53:27
17		two specific districts, so that covers a smaller	13:53:29
18		area than the entirety of the enacted map, right?	13:53:32
19	Q.	Right.	13:53:35
20	A.	We're talking about a smaller section now	13:53:36
21		in comparing those two smaller sections to one	13:53:37
22		another.	13:53:42
23	Q.	Okay. But that doesn't change the fact	13:53:42
24		that it's not possible, without regard to drawing a	13:53:44
25		map, without regard to race, to draw adjacent	13:53:46

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1	districts with similar HVAPs?	13:53:49
2	A. Yes, as I said, depending upon the	13:53:52
3	demographic variation of the region.	13:53:54
4	Q. Okay. And Dr. McCartan did it?	13:53:56
5	A. For those two examples, yes.	13:53:58
6	Q. Now in that same paragraph, 36, you say,	13:54:02
7	All challenge districts -- I'm paraphrasing, that	13:54:05
8	all challenge districts have HVAPs over 65 percent.	13:54:10
9	What do -- do you attach significance to	13:54:16
10	that, or what do you infer from that?	13:54:19
11	A. I think the significance is, again,	13:54:25
12	pointing to the similarity and the lack of variation	13:54:27
13	of these districts.	13:54:32
14	Q. Okay. And would you agree that in	13:54:33
15	Dr. McCartan's maps, A1 and A2, all of the challenge	13:54:35
16	districts have HVAPs of at least 63.6 percent?	13:54:40
17	A. All of the protected districts?	13:54:49
18	Q. Challenge districts for sure. All of the	13:54:52
19	districts in Table 8.	13:54:56
20	A. Okay. Table 8. They're all above -- what	13:55:06
21	was the number you said?	13:55:09
22	Q. 63.6.	13:55:11
23	A. Yes.	13:55:15
24	Q. So are you saying that there's a	13:55:15
25	difference, meaningful difference, between 63.6 and	13:55:17

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1	65.0 -- or 65.9?	13:55:21
2	A. I'm saying that there is a greater spread	13:55:27
3	in the plaintiffs' alternative map than there is in	13:55:31
4	the enacted map.	13:55:35
5	Q. And are you saying that the fact that	13:55:36
6	enacted map begins at 65.9 HVAP, while	13:55:37
7	Dr. McCartan's begins at 63.6 percent HVAP at the	13:55:43
8	low end, is indicative of the legislature having	13:55:49
9	used race as a consideration in drawing districts?	13:55:51
10	A. I was asked to compare the enacted map to	13:55:56
11	plaintiffs' alternative maps and determine whether	13:55:59
12	there was a difference in racial patterns.	13:56:01
13	And my conclusion was that there was.	13:56:05
14	That there was more of a -- a larger spread in the	13:56:07
15	HVAP of protected and challenge districts,	13:56:11
16	statehouse districts, than in the enacted map.	13:56:15
17	Q. And are you saying that the 65 percent	13:56:21
18	figure, or 65.9 percent figure, is -- indicates that	13:56:23
19	race was considered when we know that Dr. McCartan	13:56:32
20	didn't consider race and that his figure in maps A1	13:56:35
21	and A2 was 63.6?	13:56:39
22	A. It is a piece of my analysis that,	13:56:42
23	combined with other pieces of evidence in the	13:56:44
24	section of the report, suggest that the enacted map	13:56:48
25	considered race in a way that the plaintiffs'	13:56:53

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1	alternative maps did not.	13:56:58
2	Q. Okay. So that 2.3-percentage point	13:57:00
3	difference between the enacted map and the maps A1	13:57:03
4	and A2, the difference between and 63.6 percent and	13:57:07
5	65.9 percent, you think supports that conclusion?	13:57:10
6	A. That's not my position to judge, as an	13:57:15
7	expert witness.	13:57:18
8	Q. Okay. What conclusion does it support?	13:57:19
9	A. It is part of my evidence, as I mentioned	13:57:22
10	before, and part of the rest of the analysis that	13:57:25
11	shows that time and again, the enacted map had more	13:57:30
12	features that were in line with the idea that race	13:57:36
13	played a role in the way that the plaintiffs'	13:57:46
14	alternative maps did not.	13:57:51
15	Q. And isn't it true that the greater range	13:57:52
16	of HVAPs, from highest to lowest in Dr. McCartan's	13:57:55
17	map, is attributable primarily to the fact that he	13:57:58
18	has a higher HVAP at the high end, more so than to	13:58:01
19	the fact that he has a lower HVAP at the low end?	13:58:05
20	ATTORNEY JONES: Objection to form.	13:58:10
21	A. There's a 0.5 percentage-point	13:58:15
22	difference -- in A2, there's a 0.5 percentage-point	13:58:20
23	difference between district 112 and the enacted plan	13:58:25
24	and A2, and that's on the high end.	13:58:28
25	And there is a 1.3-percentage-point	13:58:33

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1	difference -- no, 2.3-percentage-point difference on	13:58:40
2	the low end in district 115, between the --	13:58:45
3	Q. So you're saying --	13:58:49
4	A. So the difference is larger on the low end	13:58:50
5	than it is on the high end.	13:58:52
6	Q. And those are pretty small differences,	13:58:53
7	really, at both ends.	13:58:55
8	A. It's not my place to decide whether it's	13:58:57
9	small or not.	13:59:00
10	Q. Okay. Now, the total range, from highest	13:59:01
11	to lowest HVAP among the challenge districts in	13:59:04
12	map -- maps A1 and A2, is 30.9 percent.	13:59:08
13	Would you agree with that?	13:59:14
14	A. Did I write that down somewhere, or do I	13:59:16
15	have to look at it? You are saying 30.9 percentage	13:59:20
16	points?	13:59:31
17	Q. 30.9, yes.	13:59:32
18	A. 30.9 percentage points in A1, yes.	13:59:34
19	And in A2, 30.9 percentage points.	13:59:38
20	Q. Okay. And then in paragraph 37, you say	13:59:42
21	that the range for enacted map is 28.1?	13:59:45
22	A. Yes.	13:59:49
23	Q. Okay. And so the difference really	13:59:51
24	between 28.1 and 30.9 is 2.7 percentage points?	13:59:52
25	A. Yes, it is.	13:59:58

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1	Q. Okay. And -- and yet you still conclude	13:59:59
2	that a range of HVAPs of 28.1 percentage points in	14:00:02
3	the inactive map supports your conclusion that	14:00:09
4	districts were drawn with regard to race?	14:00:13
5	A. There was a larger spread in the	14:00:16
6	alternative maps.	14:00:18
7	I should also point out that using	14:00:19
8	percentage points, which is probably the easiest	14:00:21
9	thing to do here, is not necessarily reflective of	14:00:23
10	the difference -- the percent difference -- the	14:00:28
11	percentage difference in these HVAPs, which is	14:00:31
12	calculated differently, and it's not indicative of	14:00:34
13	the number of people who are affected, right?	14:00:36
14	That's not what is listed here. So if we're talking	14:00:39
15	about substantive outcomes, that's not necessarily	14:00:42
16	the only way to look at this.	14:00:44
17	Q. Okay. But you didn't include those other	14:00:46
18	measures in your report here, correct?	14:00:48
19	A. I did not.	14:00:49
20	Q. How many maps did you review to	14:00:55
21	determine -- how many race-blind maps did you review	14:00:59
22	to determine what the range of HVAPs -- what range	14:01:03
23	of HVAPs you would expect to see in the challenge	14:01:09
24	districts?	14:01:11
25	A. The only maps that were given were	14:01:12

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1	Dr. McCartan's maps.	14:01:14
2	Q. Okay. And do you think that's a	14:01:15
3	sufficiently large sample?	14:01:17
4	ATTORNEY JONES: Objection to form.	14:01:20
5	A. Sufficient for what purpose?	14:01:22
6	Q. To draw the conclusions or inferences that	14:01:25
7	you're drawing from him?	14:01:27
8	A. I think it's circumstantial evidence.	14:01:28
9	Q. But more maps would be better, correct?	14:01:33
10	If you were to see more maps, you would be able to	14:01:37
11	draw a more certain conclusion.	14:01:39
12	A. It would depend on how the maps were	14:01:41
13	generated, but sure.	14:01:43
14	Q. If we had 100 Dr. McCartans each drawing	14:01:45
15	seven maps, and we got 700 maps, we would have a	14:01:49
16	better idea, or would have more confidence, that	14:01:55
17	those more maps have demonstrated to us what range	14:01:56
18	of HVAPs we can expect if when we were drawing race	14:01:59
19	blind?	14:02:02
20	A. I would presume so, yeah.	14:02:03
21	Q. If you were given Dr. McCartan's maps but	14:02:17
22	were not told that he was drawing race blind, then	14:02:19
23	would it be as reasonable to conclude that	14:02:26
24	Dr. McCartan was trying to create racial disparities	14:02:28
25	between districts as it is to presume that the	14:02:34

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1	legislature was trying to draw racially balanced	14:02:38
2	districts?	14:02:41
3	ATTORNEY JONES: Objection to form.	14:02:42
4	A. I was never analyzing Dr. McCartan's maps	14:02:43
5	for that reason or purpose. I was comparing them to	14:02:45
6	the enacted map in determining whether the enacted	14:02:48
7	map looked different and could be -- those	14:02:51
8	differences could be explained as a result of race.	14:02:55
9	Q. Okay. Let's say some of Dr. McCartan's	14:02:57
10	maps have three districts with HVAPs above	14:03:01
11	90 percent.	14:03:04
12	Do you agree with that?	14:03:06
13	A. Three of the districts? Yes. There's --	14:03:13
14	it looks like C2 and C1 --	14:03:16
15	Q. Okay.	14:03:18
16	A. -- and B, and C3, yup.	14:03:19
17	Q. Do you know what packing is?	14:03:30
18	A. Yes.	14:03:32
19	Q. Okay. What is packing in redistricting?	14:03:33
20	A. Packing is when you try to put as many	14:03:35
21	voters who will vote a certain way, or of a certain	14:03:40
22	race, into a district in order to prevent them from	14:03:44
23	influencing the elections in other districts.	14:03:50
24	Q. Okay. Do you have any opinion as to	14:03:53
25	whether Dr. McCartan's maps, whether intentionally	14:03:56

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1	or unintentionally, represent packing of Hispanic	14:03:59
2	voters into a smaller number of districts?	14:04:02
3	A. I do not.	14:04:04
4	Q. Okay. Let's turn to paragraph 39. Well,	14:04:27
5	wait a minute. Hold on. Okay. I was kidding.	14:04:32
6	Let's talk about the -- the boomerang	14:04:39
7	image. Okay. So in Figure 4, you display what you	14:04:44
8	referred to as a -- as a boomerang. And I believe	14:04:49
9	you say that the challenge districts -- that all of	14:04:54
10	the challenge districts have a portion of the	14:04:58
11	boomerang but also a portion of the periphery	14:05:02
12	outside of the boomerang; is that a fair statement?	14:05:04
13	A. Yeah. For the most part, yes.	14:05:11
14	Q. Okay. And is it accurate that the -- by	14:05:12
15	"boomerang," you're referring to an area within	14:05:15
16	Miami-Dade that's sort of shaped like a boomerang	14:05:18
17	where there's a higher concentration of Hispanics?	14:05:21
18	A. Correct.	14:05:23
19	Q. Okay. Now, do districts 118 and 119 have	14:05:24
20	a portion of the periphery, or are they located	14:05:31
21	entirely within the boomerang?	14:05:34
22	A. The boomerang, I think, really is	14:05:38
23	referring to the darkest brown or golden portions of	14:05:41
24	the -- of the map. So 118, 119 does have lighter	14:05:46
25	brown portions of the map.	14:05:51

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1	Q. I see. I see. Okay.	14:05:52
2	Does the fact that no district was drawn	14:05:56
3	entirely within the boomerang -- I mean, if the	14:05:59
4	legislature had drawn districts entirely within the	14:06:03
5	boomerang and other districts entirely outside of	14:06:06
6	the boomerang, would that suggest to you that they	14:06:08
7	were drawing districts according to racial	14:06:10
8	boundaries?	14:06:14
9	A. It would suggest that they were	14:06:18
10	considering race.	14:06:20
11	Q. Okay. So the fact that they didn't do	14:06:20
12	that also suggests that they were considering race?	14:06:23
13	A. Yes.	14:06:26
14	Q. Okay. So what -- what would suggest that	14:06:28
15	they weren't considering race? How should they have	14:06:30
16	drawn this if they were doing it without considering	14:06:33
17	race?	14:06:37
18	A. This map is just one -- one piece of the	14:06:38
19	puzzle, right? This is just one piece of the	14:06:40
20	evidence, but if you need to draw protected	14:06:42
21	districts, you're going to have to consider race no	14:06:47
22	matter what.	14:06:49
23	Q. Okay. So in Figure 2 of the report that	14:06:50
24	we looked at before, which was district 26.	14:06:52
25	And let me see if I can find the page for	14:06:58

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1	you. Page 16.	14:07:02
2	In that figure, I understood your	14:07:11
3	criticism to be that the district boundary follows	14:07:12
4	the boundary of the high Hispanic concentration,	14:07:15
5	correct?	14:07:24
6	A. Mm-hmm.	14:07:24
7	Q. And just so the record is clear --	14:07:25
8	A. Yes.	14:07:28
9	Q. And then in Figure 4, I understand your	14:07:28
10	criticism to be sort of the opposite of that, which	14:07:32
11	is the districts don't follow the racial boundary	14:07:34
12	but instead have -- but all of them include some of	14:07:38
13	the high Hispanic concentrations and also some low	14:07:40
14	Hispanic concentrations; is that correct?	14:07:45
15	A. That -- that is one -- one part of it,	14:07:50
16	yes. But you can see the border between	14:07:53
17	district 119 and 111, there is a very stark	14:07:57
18	difference there where the border looks to have been	14:08:01
19	drawn in a way to cordon off very high sections of	14:08:06
20	HVAP areas away from district 111.	14:08:14
21	Q. Do you know how many people live in that	14:08:18
22	blue area of district 111?	14:08:19
23	A. I don't, but I know it's not well	14:08:21
24	populated.	14:08:24
25	Q. Right, and could that be a reason why the	14:08:24

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1	districts, 119 and 118, ended where they did and	14:08:28
2	didn't go further north?	14:08:31
3	ATTORNEY JONES: Objection to form.	14:08:34
4	A. No, I don't know that was the -- why that	14:08:34
5	would be the reason.	14:08:39
6	Q. Do you know whether district -- that	14:08:40
7	interior part of the boomerang that's in	14:08:43
8	district 111 that's kind of blue or white, do you	14:08:45
9	know whether that has more people or fewer people	14:08:48
10	than, say, 3,000?	14:08:51
11	A. I don't know.	14:08:55
12	Q. Do you know whether it would be possible	14:08:58
13	to draw a district entirely within that interior	14:08:59
14	part of the boomerang?	14:09:02
15	A. By itself, just its own district, no, I	14:09:05
16	don't think -- for population equalization reasons,	14:09:09
17	it probably is not reasonable.	14:09:13
18	Q. Do you know whether it would be possible	14:09:38
19	to draw a district wholly on the outside of the	14:09:39
20	boomerang along the coast?	14:09:45
21	A. I don't know.	14:09:47
22	Q. Okay. Now, let's go to paragraph 39.	14:10:04
23	A. Paragraph -- which one?	14:10:11
24	Q. Thirty-nine. And, actually, let's go to	14:10:14
25	the municipalities section just beneath that. It's	14:10:21

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1 not separately numbered as a paragraph, but we'll go 14:10:24
2 to that municipalities and CDPs section. 14:10:26

3 And I guess my first question here is: 14:10:33
4 Did you consider any potential explanations, other 14:10:37
5 than race, why these municipalities and CDPs would 14:10:43
6 have been split the way that they were split? 14:10:49

7 A. No. 14:10:51

8 Q. Do you know whether districts -- whether 14:10:52
9 district 117 and whether districts 108 and 109 are 14:11:00
10 districts that, under Florida law, are protected in 14:11:08
11 which the ability of Black voters to elect the 14:11:12
12 candidates of their choice is protected? 14:11:13

13 A. Yes, I believe I mentioned that in my 14:11:17
14 introduction. Yes, statehouse districts 102, 108, 14:11:20
15 109, and 114. 14:11:25

16 Q. Okay. And so -- but you didn't analyze 14:11:28
17 whether the legislature's efforts to protect the 14:11:29
18 ability of Black voters to elect the candidates of 14:11:32
19 their choice in districts 108, 109, and 117 might 14:11:34
20 have been the reason why municipalities and CDPs 14:11:41
21 identified in your report were split the way that 14:11:44
22 they were split? 14:11:47

23 A. No. 14:11:49

24 Q. Do you know whether Dr. McCartan, in his 14:11:52
25 maps, splits schools and South Miami Heights the 14:11:57

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1	same way that the legislature does in the enacted	14:12:01
2	map?	14:12:04
3	A. I think -- is that in the rebuttal report?	14:12:11
4	No, it's not -- I don't know the answer to that	14:12:13
5	question.	14:12:15
6	Q. If he split Goulds and South Miami Heights	14:12:18
7	the same way while drawing without regard to race,	14:12:22
8	would that impact your analysis?	14:12:26
9	A. It would not impact my analysis.	14:12:28
10	Q. Okay. So when the legislature does it,	14:12:34
11	you would still see it as evidence that the	14:12:35
12	legislature was considering race?	14:12:38
13	A. So my analysis is not impacted by anything	14:12:40
14	Dr. McCartan did. My conclusions might be. But my	14:12:43
15	analysis is separate from Dr. McCartan's work.	14:12:46
16	Q. Okay. Thank you for that clarification.	14:12:50
17	Would it impact your conclusions?	14:12:53
18	A. It would not impact the bottom line of my	14:12:56
19	conclusion as it's, again, one piece of evidence,	14:12:58
20	and one part of -- one piece of the puzzle.	14:13:02
21	Q. Would you perhaps put less weight on the	14:13:07
22	split of Goulds and South Miami Heights than you	14:13:10
23	otherwise would?	14:13:13
24	A. Sure.	14:13:15
25	Q. Now, in South Miami Heights, if I	14:13:24

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1	understand this correctly, the portion that is in	14:13:27
2	district 118, which is one of the challenge	14:13:32
3	districts, is 80.6 percent Hispanic voting age, and	14:13:35
4	then the portion that is in district 117 is	14:13:41
5	75.9 percent Hispanic voting age; is that correct?	14:13:45
6	A. That is correct.	14:13:50
7	Q. Okay. And do you find that difference	14:13:51
8	between 80.6 percent and 75.9 percent to be	14:13:53
9	meaningful or significant in any way?	14:13:58
10	A. It's not my place to judge.	14:14:01
11	Q. Okay. So you weren't looking at the	14:14:04
12	magnitude of the difference between what was	14:14:07
13	included and what was excluded. It was simply	14:14:10
14	your -- your question was simply, which piece, the	14:14:13
15	included piece or the excluded piece, has a higher	14:14:20
16	Hispanic voting-age population?	14:14:23
17	A. Correct.	14:14:25
18	Q. Okay. Now, let's talk about this	14:14:25
19	unincorporated area you mentioned at the top of	14:14:33
20	page 25. And I -- I was not able to identify kind	14:14:36
21	of where exactly you're talking about because, you	14:14:42
22	know, most of Florida is unincorporated.	14:14:46
23	So are you able to describe what kind of	14:14:50
24	the boundaries of this unincorporated area that	14:14:52
25	you're referencing are?	14:14:55

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1	A. I would need to see a map, but I'm	14:14:58
2	referencing an area that did not include any of the	14:15:02
3	census-designated places that were mentioned	14:15:06
4	previously.	14:15:08
5	Q. Okay. And those -- are those CDPs, are	14:15:11
6	those the ones that are listed in the paragraph at	14:15:17
7	the top of page 25, Kendall West, Hialeah Lakes,	14:15:19
8	Country Walks, and Richmond West?	14:15:26
9	A. Yes.	14:15:29
10	Q. Okay. And you would agree that those are	14:15:29
11	CDPs and not incorporated municipalities?	14:15:31
12	A. Correct.	14:15:33
13	Q. Do you know whether Dr. McCartan splits	14:15:47
14	the unincorporated area the same way that the	14:15:49
15	legislature did?	14:15:51
16	A. I do not know.	14:15:53
17	Q. Okay. If he split that unincorporated	14:15:54
18	area between the challenged districts and the	14:15:58
19	unchallenged districts in the same way that the	14:16:01
20	legislature did, would that impact your conclusions?	14:16:05
21	ATTORNEY JONES: Objection to form.	14:16:08
22	A. Not -- not my own conclusions, no.	14:16:12
23	Q. Okay. So what conclusion are you drawing	14:16:15
24	from the way that the legislature split that	14:16:18
25	unincorporated area?	14:16:20

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1 A. I mean, using it as one piece of evidence 14:16:24
2 among many others to suggest that portions of South 14:16:28
3 Florida that had higher Hispanic voting-age 14:16:35
4 population were placed into Hispanic-protected 14:16:39
5 districts, and portions that had lower HVAP were 14:16:42
6 not. 14:16:47

7 Q. And not only that they were placed in 14:16:48
8 different districts, but that there was some 14:16:51
9 nonrandomness or intentionality behind that? 14:16:53

10 A. That there was -- it was consistent for it 14:16:56
11 to not be random. 14:17:00

12 Q. Okay. And the fact that Dr. McCartan 14:17:02
13 split this incorporated area in precisely the same 14:17:04
14 way the legislature did, that doesn't suggest to you 14:17:07
15 that maybe this evidence doesn't support your 14:17:11
16 conclusion? 14:17:15

17 ATTORNEY JONES: Objection to form. 14:17:16

18 A. I don't know if that's true as I did not 14:17:17
19 look at it, but if it is true, it's -- it's just one 14:17:19
20 piece of -- of my other -- of all my evidence. 14:17:23

21 Q. Okay. 14:17:28

22 ATTORNEY BARDOS: And just for 14:17:30
23 clarification, Patrick: What was the 14:17:31
24 objection? I want to do this right the next 14:17:35
25 time. 14:17:37

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1	ATTORNEY JONES: I think you just said --	14:17:38
2	I think it was assumes facts because you just	14:17:39
3	assumed that Dr. McCartan did something that	14:17:42
4	she hadn't agreed to yet.	14:17:45
5	ATTORNEY BARDOS: Got you.	14:17:47
6	Q. Okay. Let's turn to paragraph 40, and	14:17:56
7	this is where you begin your analysis of VTDs along	14:17:58
8	the boundaries of the challenge districts. And --	14:18:02
9	and the first challenge district that you analyze is	14:18:05
10	district 112. And when I look at Table 9, it looks	14:18:08
11	to me like a wash, like, it doesn't really point in	14:18:15
12	one direction or another.	14:18:18
13	Would you agree with that?	14:18:19
14	A. It's three out of five. Three out of five	14:18:21
15	pairs.	14:18:28
16	Q. Which is about as close you can get to	14:18:29
17	50-50 when you have five rows, right?	14:18:31
18	A. I suppose so.	14:18:34
19	Q. So are you concluding from this, or do you	14:18:35
20	think this suggests anything, Table 9 --	14:18:37
21	A. I -- I am not looking at that individual	14:18:42
22	table in isolation. I look at all the tables, all	14:18:47
23	of the precinct pairs, across all of the protected	14:18:49
24	districts.	14:18:53
25	Q. Okay. Now, do you know whether -- so	14:18:53

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1	you're not analyzing each district on its own	14:18:56
2	merits; you're looking at kind of the collective	14:19:02
3	picture across all seven challenge districts?	14:19:04
4	A. Correct.	14:19:07
5	Q. I see. And so do you not -- do you have	14:19:08
6	an opinion as to whether district 112 was drawn with	14:19:23
7	regard to race?	14:19:31
8	A. I think the -- the challenge districts, as	14:19:35
9	a whole, were drawn with regard to race.	14:19:39
10	Q. Okay. But you're not rendering an opinion	14:19:44
11	as to whether any particular district among those	14:19:46
12	challenge districts was drawn with respect to race?	14:19:51
13	A. That's not the conclusion I draw from my	14:19:55
14	analysis.	14:19:57
15	Q. Okay. Let's turn to Table 10. And what I	14:19:57
16	understand this table to be is the -- a list of the	14:20:21
17	precinct -- VTDs that were split along the boundary	14:20:27
18	of district 113, as well as a list of VTDs -- VTD	14:20:33
19	pairs, meaning one inside, one outside of the	14:20:41
20	district, along the boundary of 113; is that right?	14:20:43
21	A. Correct.	14:20:47
22	Q. Okay. So this is sort of like tables --	14:20:47
23	when we looked at Tables 3 and 4 before, they were	14:20:50
24	separated so that one was split VTDs and the other	14:20:53
25	one was VTD pairs, and this kind of combines them	14:20:56

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1	into one table; is that right?	14:21:00
2	A. Yes, I think that's -- that's a reasonable	14:21:02
3	characterization.	14:21:06
4	Q. Okay. And the asterisk would indicate	14:21:07
5	that that VTD is just -- is a split VTD, that it's	14:21:09
6	just a partial VTD?	14:21:14
7	A. Correct.	14:21:17
8	Q. Okay. Yeah, I just want to be sure I'm	14:21:18
9	reading this correctly.	14:21:20
10	So did you -- did you consider any -- and	14:21:21
11	this is going to start being repetitive, but did you	14:21:31
12	consider any alternative explanations for these	14:21:35
13	splits besides the possibility of race being the	14:21:38
14	factor?	14:21:41
15	A. I did not.	14:21:42
16	Q. Okay. So you did not consider whether	14:21:43
17	Miami VTDs, 47, 48, 38, and 30 might be the southern	14:21:51
18	end of the City of Miami Beach and maybe that's why	14:22:00
19	they weren't brought into district 113?	14:22:03
20	A. No, I did not consider that.	14:22:09
21	Q. Okay. Did you -- did you -- did you	14:22:14
22	assess whether Dr. McCartan's maps allocate those	14:22:20
23	VTDs that I just mentioned at the southern end of	14:22:25
24	the City of Miami Beach the same way that the	14:22:27
25	legislature's map does?	14:22:31

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1	A.	Can you repeat the question?	14:22:33
2	Q.	So did you assess whether the VTDs I	14:22:34
3		mentioned, which are 47, 48, 38, and 30 at the	14:22:39
4		southern end of the City of Miami Beach, are	14:22:44
5		assigned in Dr. McCartan's map to -- in the same way	14:22:49
6		that they are in the enacted map, meaning they're	14:22:53
7		assigned to an unchallenged district, but they're on	14:22:55
8		the boundary of a challenged district?	14:22:58
9	A.	I did not assess that.	14:23:00
10	Q.	Okay. Did you assess whether	14:23:01
11		districts 108 and 109 are similar in Dr. McCartan's	14:23:06
12		maps to districts 108 and 109 in the enacted map?	14:23:12
13	A.	As a whole --	14:23:17
14		ATTORNEY JONES: Object to form.	14:23:22
15	A.	No, I do not -- I do not have 108 and 109	14:23:25
16		here.	14:23:33
17	Q.	Okay. And so you did not assess the	14:23:34
18		extent to which the splits of VTDs between	14:23:35
19		district 113 and district 108 -- or district 113 and	14:23:39
20		district 109, also appear in Dr. McCartan's maps?	14:23:43
21	A.	I did not.	14:23:47
22	Q.	And you didn't consider whether the VTDs	14:23:58
23		that were excluded from district 113 but included	14:24:01
24		in 108 and 109, might have been included in 108	14:24:05
25		and 109 because of the legislature's efforts to	14:24:10

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1	maintain the ability of Black voters in those	14:24:12
2	districts to elect the candidates of their choice?	14:24:15
3	A. I did not.	14:24:18
4	Q. If you look at VTD 538, one portion of	14:24:24
5	it -- or the portion that's included in district 113	14:24:34
6	is 55.2 percent HVAP, and then in 108, a portion of	14:24:37
7	538 is 55.0 percent HVAP, so a difference of	14:24:44
8	two-tenths of a percentage point.	14:24:49
9	Is that -- I mean, we've done this -- kind	14:24:51
10	of we've talked about this before, and I -- I don't	14:24:55
11	want to put you through this more than I need to,	14:24:57
12	but I just need to cover my bases.	14:25:00
13	You didn't assess kind of the magnitude of	14:25:02
14	the differences between the HVAPs and the included	14:25:04
15	versus excluded VTDs?	14:25:07
16	(Reporter clarification.)	14:25:14
17	A. No.	14:25:17
18	Q. And you also didn't assess how many people	14:25:27
19	live in these VTDs other than the -- that's over	14:25:32
20	100?	14:25:39
21	A. Correct.	14:25:39
22	Q. Okay.	14:25:47
23	ATTORNEY BARDOS: Let me share an exhibit	14:25:49
24	here, and this is Exhibit 8. I'm putting it	14:25:50
25	into the chat.	14:25:53

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1	Q. And you've seen it before. This is	14:25:56
2	formatted, at least.	14:25:59
3	(Plaintiffs' Exhibit No. 8 was	14:26:00
4	marked for identification.)	14:26:00
5	Q. Okay. So on Exhibit 8, what I did is the	14:26:08
6	same thing that I did before. I deduplicated the	14:26:11
7	VTDs in your Table 10. So there's a list of the	14:26:14
8	VTDs that were included in 113 and a list of the	14:26:18
9	VTDs that were excluded from 113, and then I ranked	14:26:22
10	them from highest HVAP to lowest HVAP.	14:26:26
11	And so would you agree with me that the	14:26:30
12	VTDs at the legislature included 113 include VTDs	14:26:32
13	with -- with an HVAP of 37 percent, 41.8 percent,	14:26:36
14	42.8 percent, and 44.8 percent as four examples?	14:26:43
15	A. Yes.	14:26:50
16	Q. And would you agree that the VTDs that the	14:26:51
17	legislature -- that are along the boundary of 113	14:26:53
18	but were not included in 113, include VTDs with	14:26:57
19	HVAPs of 88.2 percent, 68.3 percent, 64.3 percent,	14:27:00
20	61.4 percent and 55 percent?	14:27:06
21	A. Yes.	14:27:10
22	Q. Okay.	14:27:17
23	ATTORNEY BARDOS: I will stop sharing the	14:27:17
24	screen.	14:27:19
25	Q. And also, in this Table 10, as in the	14:27:19

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1	other tables, there are, among the list of included	14:27:23
2	VTDs, VTDs that are listed more than once, correct?	14:27:27
3	A. Yes.	14:27:32
4	Q. Okay. And, for example, Miami-Dade 983	14:27:33
5	appears four times?	14:27:37
6	A. Yes.	14:27:42
7	Q. And Miami-Dade 538 appears twice?	14:27:44
8	A. Yes.	14:27:48
9	Q. And Miami-Dade 984.0 appears twice?	14:27:50
10	A. Yes.	14:27:54
11	Q. And Miami-Dade 543 appears twice?	14:27:55
12	A. Yes.	14:27:58
13	Q. Okay. And each row, including the	14:28:00
14	duplicates and, in one case, quadruplicates, each	14:28:03
15	one would factor into your probability analysis as	14:28:10
16	a -- and increase the denominator?	14:28:14
17	A. The rows themselves are not duplicates,	14:28:18
18	but the multiple precincts on one side that are	14:28:21
19	paired with different pairs all each factor into my	14:28:25
20	probability analysis.	14:28:30
21	Q. Okay. So if there's a VTD that's listed	14:28:31
22	more than once in this table, it would be reflected	14:28:33
23	more than once in your probability analysis?	14:28:39
24	A. Yes, but the unit of analysis is the pair,	14:28:43
25	not the individual VTD.	14:28:46

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1	Q. Right. Okay. That's it for Table 10.	14:28:49
2	Let's move on to Table 11. And I'm sorry	14:28:53
3	if this is repetitive, and some of the questions	14:28:58
4	will be the same, but I just need -- I just need it	14:29:00
5	on the record so.	14:29:03
6	Table 11 -- so my understanding of	14:29:05
7	Table 11, again, is these are VTDs that lie along	14:29:08
8	the boundary of district -- enacted district 115,	14:29:11
9	and the VTDs listed on the left are those that are	14:29:17
10	included and those that are listed on the right are	14:29:23
11	excluded; is that correct?	14:29:26
12	A. That is correct.	14:29:27
13	Q. And in -- in this -- in creating Table 11,	14:29:28
14	did you assess alternative explanations, besides	14:29:31
15	race, for why these VTDs were split in the way that	14:29:34
16	they were split?	14:29:39
17	A. I did not.	14:29:40
18	Q. And in this case, as well, is it accurate	14:29:44
19	to say that you did not consider the magnitude of	14:29:48
20	the difference in HVAP between the included VTD	14:29:51
21	versus the excluded VTD? That wasn't a part of your	14:29:56
22	analysis?	14:30:00
23	A. That is correct.	14:30:01
24	Q. Okay. And in this table, do you know	14:30:02
25	whether -- with the exception of the first row that	14:30:14

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1	refers to Miami-Dade 756, do you know, if we set	14:30:22
2	that one aside and look at the other rows in the	14:30:27
3	table, whether Dr. McCartan's maps separate those	14:30:29
4	VTDs in exactly the same way as the enacted map	14:30:32
5	between challenge versus unchallenged districts?	14:30:36
6	A. I do not know.	14:30:39
7	Q. Okay. Would it impact your conclusions if	14:30:40
8	he did?	14:30:43
9	A. No.	14:30:45
10	Q. Why not?	14:30:46
11	A. It's just one piece of evidence compared	14:30:48
12	to all of my pieces of evidence.	14:30:50
13	Q. And would you agree that Miami-Dade 819	14:31:00
14	appears twice in Table 11?	14:31:04
15	A. Yes.	14:31:07
16	Q. And so does Miami-Dade 833?	14:31:09
17	A. A portion of 833, yes.	14:31:14
18	Q. And Miami-Dade 825 appears five times?	14:31:17
19	A. Yes.	14:31:21
20	Q. And -- and so each instance of those would	14:31:24
21	be part of your probability analysis, correct?	14:31:29
22	A. Each pair appears in my probability	14:31:32
23	analysis, yes.	14:31:34
24	Q. Yes. Even if the included VTD is the same	14:31:36
25	in multiple pairs?	14:31:39

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1	A. That is correct.	14:31:41
2	Q. Now, you mentioned that Dr. McCartan's	14:31:55
3	splitting of these VTDs wouldn't impact your	14:31:58
4	conclusions because it's part of a bigger -- a	14:32:01
5	bigger kind of body of evidence.	14:32:04
6	What -- apart from the VTD splits and the,	14:32:10
7	let's say municipality splits, as well, what	14:32:17
8	evidence are you relying on with respect to the	14:32:20
9	statehouse districts to demonstrate that race was a	14:32:23
10	factor?	14:32:27
11	A. So everything in this section of the	14:32:31
12	report, the VTD analysis, as you've mentioned, the	14:32:34
13	municipality analysis, and the sort of more holistic	14:32:37
14	regional analysis that shows the, sort of, shortened	14:32:44
15	spread of HVAP in protected districts.	14:32:51
16	Q. Would you agree with me that the VTD-split	14:32:56
17	analysis doesn't tell us anything about the drawing	14:33:01
18	of boundaries between two challenge districts?	14:33:04
19	A. Can you rephrase the question?	14:33:14
20	Q. Sure. And I'll ask kind of have an	14:33:16
21	initial question that might help: In the VTD	14:33:19
22	analysis, you're looking at boundaries between a	14:33:23
23	challenge district and unchallenged districts,	14:33:26
24	correct?	14:33:28
25	A. Correct.	14:33:28

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1	Q. Okay. So you're not analyzing boundaries	14:33:29
2	between two challenge districts.	14:33:32
3	A. That is correct.	14:33:34
4	Q. Okay. And so would you agree that your	14:33:35
5	VTD-splits analysis doesn't tell us anything about	14:33:38
6	why the legislature drew the lines between challenge	14:33:41
7	districts or what it considered in drawing those	14:33:47
8	lines?	14:33:50
9	A. I think that's correct.	14:33:50
10	Q. Okay.	14:33:53
11	ATTORNEY BARDOS: Let's take a look at	14:34:16
12	Exhibit 9.	14:34:18
13	(Plaintiffs' Exhibit No. 9 was	14:34:21
14	marked for identification.)	14:34:21
15	ATTORNEY JONES: Would you like to take a	14:34:22
16	break?	14:34:23
17	THE WITNESS: I don't, unless you want to	14:34:29
18	take a break.	14:34:30
19	ATTORNEY JONES: No, I'm just moving	14:34:32
20	around.	14:34:33
21	THE WITNESS: That's okay.	14:34:33
22	ATTORNEY BARDOS: Yeah, let's go ahead and	14:34:34
23	take a break. It's been -- it's been an hour.	14:34:34
24	Do we want to reconvene in about ten minutes?	14:34:38
25	ATTORNEY JONES: Okay.	14:34:41

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1	ATTORNEY BARDOS: Okay. Let's do that.	14:34:42
2	THE COURT REPORTER: All right. The time	14:34:45
3	is 2:34 EST, and we're off the record.	14:34:49
4	(Recess.)	14:34:55
5	THE COURT REPORTER: The time is now is	14:46:12
6	14:46 Eastern Time, and we are back on the	14:46:15
7	record.	14:46:20
8	Q. Dr. Abbott, I've shown on the screen	14:46:24
9	Exhibit 9. And this is, like some of the previous	14:46:28
10	exhibits, I've taken what's in your Table 11, and	14:46:35
11	deduplicated and sorted the VTDs that are inside the	14:46:40
12	district by HVAP from highest to lowest, and then	14:46:44
13	separately sorted the VTDs that are outside the	14:46:47
14	district by HVAP from highest to lowest.	14:46:50
15	Would you agree that there are VTDs along	14:46:53
16	the border of 115 but inside the district, with	14:46:59
17	HVAPs of 49.4, 53.2, 54.5, and 57.7 percent?	14:47:04
18	A. Yes.	14:47:13
19	Q. And would you agree that there are VTDs	14:47:14
20	along the boundary of district 115 right on the	14:47:16
21	outside of the district with HVAPs	14:47:22
22	of 77.8 percent, 74.6 percent, 68.2 percent, and	14:47:24
23	67.4 percent, and 65.5 percent?	14:47:33
24	A. Yes.	14:47:35
25	Q. Let's move on to paragraph 45, and this is	14:47:42

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1	your analysis of 118.	14:47:46
2	Oh, but before we do that, let's go back	14:47:49
3	to paragraphs 42 and 44. These relate to	14:47:52
4	districts 114 and 116, and, correct me if I'm wrong,	14:47:57
5	but, as I understand it, those two districts don't	14:48:04
6	share a border with a non-Hispanic protected	14:48:07
7	district, and so there are no VTD splits to analyze	14:48:12
8	there.	14:48:16
9	A. Yes, that is correct.	14:48:16
10	Q. All right. Now let's go to paragraph 46,	14:48:20
11	and this concerns district 118.	14:48:23
12	A. 46 or 45?	14:48:27
13	Q. I'm sorry, 45. Yes, 45.	14:48:30
14	Okay. I guess let's start where we did	14:48:44
15	before on the previous one and that is: Did you	14:48:47
16	examine any alternative explanations for why these	14:48:50
17	VTDs were split the way that they were besides race?	14:48:56
18	A. I did not.	14:49:00
19	Q. So you would not have considered, for	14:49:01
20	example, whether the legislature's efforts to	14:49:02
21	maintain district 117 as a district in which Black	14:49:04
22	voters are able to elect candidates of their choice	14:49:04
23	might have been the reason why these VTDs were split	14:49:09
24	the way that they were?	14:49:11
25	A. No.	14:49:12

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1	Q. Okay. And did you -- did you consider,	14:49:13
2	for example, whether VTDs 841, 815 and 838, which	14:49:17
3	are within the district, are bounded on one side by	14:49:24
4	the turnpike, meaning that if the legislature were	14:49:28
5	to incorporate the excluded contiguous VTD, it would	14:49:31
6	have to cross the turnpike and wouldn't be able to	14:49:36
7	follow the turnpike as a district boundary?	14:49:39
8	A. Are you asking if I considered that?	14:49:42
9	Q. Yes.	14:49:45
10	A. No, I did not consider that.	14:49:45
11	Q. Okay. And I guess, let's try to maybe	14:49:49
12	do -- shortcut this a little bit. And I'll ask you	14:49:54
13	these questions about both Table 12 and Table 13,	14:50:00
14	which concerns district 119, and both of those	14:50:03
15	tables has in the others, you didn't consider, or it	14:50:07
16	wasn't relevant to your analysis, what the magnitude	14:50:12
17	of difference was in the HVAPs between the included	14:50:14
18	VTD and the excluded VTD?	14:50:18
19	A. That's correct.	14:50:20
20	Q. Okay. And, again, in both Tables 12	14:50:21
21	and 13, to the extent that VTDs are listed more than	14:50:41
22	once as being included in the district, those would	14:50:45
23	be reflected more than once in the probability	14:50:50
24	analysis, correct?	14:50:54
25	A. Each unique pair is reflected in the	14:50:56

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1	probability analysis.	14:50:59
2	Q. Okay. Even if the included VTD is the	14:51:03
3	same in those different pairs?	14:51:05
4	A. Correct.	14:51:08
5	Q. Now, do you know, with respect to	14:51:10
6	Table 12, whether, other than the first two rows,	14:51:13
7	Dr. McCartan split these VTDs in exactly the same	14:51:19
8	way between challenged and unchallenged districts?	14:51:22
9	A. I do not know.	14:51:25
10	Q. Do you recall, in Dr. Trende's report,	14:51:29
11	where he said that this split-VTD analysis would	14:51:32
12	identify Dr. McCartan's statehouse maps as racial	14:51:36
13	gerrymanders?	14:51:42
14	A. I know that he says that about the	14:51:43
15	congressional districts. I don't recall if he says	14:51:45
16	that specifically about the statehouse district map.	14:51:47
17	Q. In your rebuttal report -- in that -- I	14:51:50
18	guess, if you don't know -- in your rebuttal report,	14:51:54
19	you didn't attempt to show that Dr. McCartan's maps	14:51:58
20	would not be subject to the same conclusions. So	14:52:01
21	the same conclusions would not apply to	14:52:08
22	Dr. McCartan's map if the VTD split analysis were	14:52:12
23	run on his maps?	14:52:12
24	A. No, Dr. Trende did not do this analysis to	14:52:14
25	show that -- to show that Dr. McCartan's maps would	14:52:18

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1	have the same issues, so I did not follow up with	14:52:21
2	that specific analysis.	14:52:25
3	Q. Turning to Table 13, would you agree with	14:52:42
4	me that most of the rows in this map indicate that	14:52:44
5	the higher HVAP was excluded from the district	14:52:52
6	rather than included?	14:52:57
7	ATTORNEY JONES: Objection to form.	14:53:03
8	A. It looks like seven -- seven rows with	14:53:07
9	higher HVAP -- seven pairs with higher HVAP in	14:53:11
10	district 119 were included in district 119 and eight	14:53:14
11	pairs with higher HVAP were not included in	14:53:18
12	district 119.	14:53:21
13	Q. And in preparing Table 13, hereto, you	14:53:36
14	didn't consider alternative explanations, besides	14:53:41
15	race, for why these VTDs were split the way they	14:53:44
16	were?	14:53:47
17	A. I did not.	14:53:48
18	Q. And so you didn't consider whether all of	14:53:52
19	these VTDs that are included in district 119 are	14:53:55
20	bounded on one side by Krome Avenue, which means	14:54:00
21	that to include the adjacent pair, the legislature	14:54:03
22	would have to cross Krome Avenue and wouldn't be	14:54:07
23	able to follow it as the district boundary.	14:54:11
24	A. I did not consider that.	14:54:14
25	Q. Did you consider whether Dr. McCartan's	14:54:21

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1	maps split these VTDs in exactly the same way?	14:54:24
2	A. I did not.	14:54:28
3	Q. Last set of questions here about Table 1,	14:54:40
4	Table 13.	14:54:41
5	ATTORNEY BARDOS: And for the court	14:54:45
6	reporter, Krome Avenue is K-R-O-M-E.	14:54:46
7	So I'm adding Exhibit 11 to the chat. And	14:55:04
8	I guess we didn't do this for Table 12, so	14:55:09
9	we'll go back to that in a second.	14:55:11
10	(Plaintiffs' Exhibit No. 11 was	14:55:13
11	marked for identification.)	14:55:13
12	Q. Okay. In looking at Exhibit 11,	14:55:20
13	Dr. Abbott, would you agree that the legislature	14:55:26
14	included in district 119 along the border, VTDs with	14:55:31
15	HVAPs of 63 percent, 63.5 percent,	14:55:38
16	76.6 percent, 76 percent, and 79.3 percent?	14:55:43
17	A. Yes.	14:55:54
18	Q. And that it excluded from 119, VTDs that	14:55:54
19	were along the border with HVAPs of 94.3 percent,	14:55:56
20	92.6 percent, 89.8 percent, and 81.7 percent?	14:56:03
21	A. Yes.	14:56:11
22	ATTORNEY BARDOS: And here's Exhibit 10.	14:56:26
23	(Plaintiffs' Exhibit No. 10 was	14:56:28
24	marked for identification.)	14:56:28
25	Q. And this goes back to district 119.	14:56:35

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1	And so would you agree that the	14:56:38
2	legislature included district 119 VTDs along the	14:56:40
3	district boundary with HVAPs 64.5, 64.6, 69, and	14:56:43
4	69.9 percent?	14:56:52
5	A. Yes.	14:56:56
6	Q. And that it excluded from district 118	14:56:56
7	along the border, VTDs with HVACs of 87.8	14:56:57
8	percent, 81.3 percent, 77.8 percent, 75.8	14:57:00
9	percent, 74.6 percent, and 74.3 percent?	14:57:06
10	A. Yes.	14:57:13
11	Q. Okay. All right. So the probability	14:57:13
12	analysis that you did for the statehouse maps, I	14:57:21
13	just want to confirm that it's the same for the	14:57:26
14	statehouse as for the congressional map.	14:57:28
15	Your probability analysis appears in	14:57:34
16	paragraph -- paragraphs 47 and 48, and you say in	14:57:39
17	paragraph 47 that:	14:57:42
18	"45 of the 67 neighboring pairs have a	14:57:47
19	higher HVAP inside the challenged	14:57:52
20	district side of the boundary."	14:57:56
21	Is that correct?	14:57:59
22	A. That is correct.	14:58:00
23	Q. And that that would include splits of VTDs	14:58:01
24	or VTD pairs, where the excluded VTD is in a	14:58:03
25	district that was drawn to protect the ability of	14:58:07

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1	Black voters to elect the candidates of their	14:58:10
2	choice?	14:58:12
3	A. That's correct.	14:58:13
4	Q. And it would include VTDs that are -- the	14:58:16
5	VTDs included in the district, it would --	14:58:27
6	sometimes, it would count twice if they were paired	14:58:32
7	with more than one VTD on the outside?	14:58:35
8	A. Yes, each unique pair entered into the	14:58:39
9	probability analysis.	14:58:42
10	Q. Okay. And you did not calculate a	14:58:43
11	probability analysis for Dr. McCartan's maps?	14:58:45
12	A. That is correct.	14:58:48
13	Q. All right. So let's go back -- so now	14:58:51
14	let's move on to the candidate of choice question	14:59:00
15	for the statehouse districts. And in paragraph --	14:59:04
16	let's go to paragraph 10 of your report.	14:59:06
17	A. Paragraph which?	14:59:10
18	Q. Paragraph 10.	14:59:11
19	And beginning on the fifth line of	14:59:28
20	paragraph 10 toward the end of that line, it says:	14:59:30
21	"The districts examined contain greater	14:59:33
22	concentrations of Republican voters	14:59:36
23	compared to other portions of Miami-Dade	14:59:38
24	County."	14:59:40
25	Do you know whether that's also true of	14:59:42

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1	Dr. McCartan's maps?	14:59:45
2	A. I do not know.	14:59:46
3	Q. All right. Let's go to paragraph 49 and	14:59:53
4	take a look at Table 14.	14:59:55
5	And if we -- let's -- let's look only at	15:00:13
6	the challenge districts. So let's, for now, just	15:00:17
7	not consider districts 110, 111. That leaves 21	15:00:20
8	cells, three elections by seven districts, in	15:00:27
9	Table 14.	15:00:31
10	Do you know how many of those 21 elections	15:00:33
11	were won by the Republican candidate?	15:00:39
12	A. I don't have -- I don't have the election	15:00:44
13	returns -- or election results written down, no.	15:00:47
14	Q. Okay. Do you know whether it's a majority	15:00:50
15	of those 21?	15:00:52
16	A. I don't -- I don't know.	15:00:55
17	Q. Do you know, if you were to prepare an	15:01:01
18	identical table like this for Dr. McCartan's maps,	15:01:03
19	whether his maps would show more Republican	15:01:06
20	victories than the enacted map does in the challenge	15:01:11
21	districts?	15:01:15
22	A. So --	15:01:18
23	ATTORNEY JONES: Objection to form.	15:01:20
24	A. In Table 15, I do compare the	15:01:21
25	presidential -- the 2020 -- the 2020 presidential	15:01:26

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1	election from -- I compare the enacted map results	15:01:30
2	to the alternative map results.	15:01:34
3	Q. Okay. And we'll talk about Table 15 in a	15:01:38
4	second, but I take it you didn't prepare a table	15:01:41
5	like Table 14 for Dr. McCartan's maps?	15:01:46
6	A. No, I did not.	15:01:49
7	Q. Okay. And so you didn't know whether, in	15:01:51
8	most of his maps, Republicans would win more	15:01:55
9	elections than in the enacted maps in the challenge	15:01:59
10	districts?	15:02:02
11	A. I can only say something about the 2020	15:02:03
12	presidential election because that's what's -- I	15:02:06
13	know.	15:02:13
14	Q. All right. In paragraph 50 of your	15:02:14
15	report, in the -- on the beginning on the third	15:02:16
16	line, towards the end of that line, there's a	15:02:29
17	sentence that says:	15:02:31
18	"Within the area covered by the	15:02:34
19	Hispanic-protected districts, more	15:02:36
20	heavily Republican are arrayed in a	15:02:38
21	similar boomerang shape as the one	15:02:43
22	discussed above."	15:02:45
23	Do you see that?	15:02:46
24	A. Mm-hmm.	15:02:48
25	Q. And the boomerang area, if I remember	15:02:48

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1	correctly, was the area within Miami-Dade County	15:02:50
2	with higher concentrations of Hispanic voters; is	15:02:52
3	that correct?	15:02:56
4	A. That's correct.	15:02:56
5	Q. And are you saying here, in paragraph 50,	15:02:57
6	is that that same boomerang is also more heavily	15:02:59
7	Republican than other areas, surrounding areas, in	15:03:04
8	Miami-Dade County?	15:03:07
9	A. That appears to be the case, yeah.	15:03:08
10	Q. Okay. And so what would that tell you	15:03:11
11	about the partisan preferences of Hispanics who live	15:03:12
12	in that boomerang?	15:03:15
13	A. From an ecological inference standpoint,	15:03:19
14	it would suggest that those Hispanic voters tend to	15:03:23
15	vote Republican.	15:03:27
16	Q. In paragraph 51, you mention a -- what you	15:03:42
17	call a considerable swath of democratic voters in	15:03:48
18	the southern and/or middle portions of	15:03:53
19	districts 114, 115, 116, 118, and 119. And you say	15:03:56
20	that the districts appear to be drawn in such a way	15:04:06
21	as to distribute these democratic voters across all	15:04:08
22	five districts in order to maintain all of these	15:04:12
23	districts as Republican leaning.	15:04:14
24	Do you know whether Dr. McCartan's maps	15:04:17
25	keep that swath of democratic voters together in	15:04:20

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1	fewer districts?	15:04:23
2	A. I don't.	15:04:28
3	Q. And you're not suggesting, are you, that	15:04:41
4	the legislature should have drawn a district for	15:04:43
5	democrats in this area, correct?	15:04:48
6	A. I have not suggested anything, no.	15:04:51
7	Q. In paragraph 52, you say that the external	15:04:57
8	borders of districts 111, 110, 112, 115, and 118	15:05:00
9	avoid heavily democratic areas assigned to adjacent	15:05:07
10	districts.	15:05:11
11	Do you know, in the case of 110 and 111,	15:05:14
12	whether those heavily democratic areas that those	15:05:15
13	two districts avoid are on the other side of the	15:05:20
14	county boundary in Broward County?	15:05:24
15	A. I do not know.	15:05:28
16	Q. Do you know whether some of those heavily	15:05:29
17	democratic areas that border 110 are in	15:05:35
18	districts 104, 107, and 109, which are	15:05:38
19	constitutionally protected for African-American	15:05:44
20	voters?	15:05:46
21	A. I don't -- I don't think I was told	15:05:48
22	anything about 104 --	15:05:50
23	(Reviewing document.)	15:06:19
24	I was not told anything about 104.	15:06:20
25	Q. Now, 112, you say that it avoids heavily	15:06:29

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1	Democratic areas assigned to adjacent districts.	15:06:34
2	Is that adjacent district, district 109?	15:06:37
3	A. Yes.	15:06:44
4	Q. And is 109 one of the districts that you	15:06:45
5	understand to be constitutionally protected for	15:06:47
6	African-American voters?	15:06:49
7	A. To promote the likelihood that Black --	15:06:52
8	Black voters can elect their candidate of choice,	15:06:55
9	yes.	15:06:58
10	Q. Okay. And so do you think that might be a	15:06:59
11	reason why district 112 doesn't incorporate heavily	15:07:01
12	Democratic areas in district 109?	15:07:04
13	A. Just because a district is protected for a	15:07:07
14	minority doesn't mean the boundary cannot change.	15:07:10
15	Q. So you're saying that that's -- you're --	15:07:16
16	you disagree with that, it can't be the reason why	15:07:20
17	district 112 would not have incorporated areas that	15:07:24
18	are within 109?	15:07:27
19	A. I did not assess the probability of that	15:07:29
20	being the case.	15:07:31
21	Q. Okay. Likewise, with districts 115	15:07:32
22	and 118, which districts -- which adjacent district	15:07:34
23	contains heavily Democratic areas that 115 and 118	15:07:41
24	avoid?	15:07:45
25	A. I just need to see. Can you -- you mind	15:07:58

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1	pointing me back to -- we were still on	15:08:00
2	paragraph 52?	15:08:03
3	Q. Correct.	15:08:05
4	A. No, I don't -- I don't think it's labeled,	15:08:11
5	but it looks like it should be district 117, unless	15:08:13
6	I'm missing it. I don't think district 117 is	15:08:18
7	labeled on Figure 5.	15:08:22
8	Q. Okay. Is it that -- is it that thin	15:08:24
9	district that goes off south off of figure 5?	15:08:28
10	A. That is correct.	15:08:33
11	Q. So I'll represent to you that that's	15:08:33
12	district 117.	15:08:35
13	So is it possible that the reason that	15:08:37
14	districts 115 and 118 don't incorporate the heavily	15:08:40
15	Democratic areas in 117, that the reason for that is	15:08:45
16	that 117 was drawn to protect the ability of	15:08:49
17	African-American voters to elect the candidates of	15:08:53
18	their choice?	15:08:55
19	A. I did not assess that likelihood.	15:08:56
20	Q. All right. Let's just move to	15:09:00
21	paragraph 53. And this is the paragraph in which	15:09:02
22	you talk about the Republican vote share in the 2020	15:09:04
23	presidential election in each of the districts. And	15:09:11
24	tell me what you conclude in looking at the data in	15:09:15
25	Table 15.	15:09:22

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1	A.	I think the most important conclusion here	15:09:23
2		was that there was a smaller spread in the	15:09:25
3		Republican vote share across the protected districts	15:09:32
4		compared to the alternative maps.	15:09:36
5	Q.	Okay. And what does that tell us?	15:09:39
6	A.	It suggests that voters were placed in	15:09:41
7		districts in a certain way to maximize the	15:09:45
8		likelihood that the -- to maximize the number of	15:09:49
9		Republican candidates that would be sent to office.	15:09:52
10	Q.	Okay. And the range of Republican vote	15:09:55
11		share across these districts in the enacted map	15:09:59
12		was 20.3 percentage points?	15:10:07
13	A.	Yes.	15:10:11
14	Q.	Okay. What was it in McCartan map A1?	15:10:11
15	A.	The lowest was 45.8 percentage point --	15:10:24
16		45.8 percent. The highest was 62.2. So -- so	15:10:24
17		that's 16.6 percentage points? No, 26.6 percentage	15:10:35
18		points? You're asking me to do math.	15:10:47
19	Q.	Yeah, I'll tell you that I think it's	15:10:52
20		19.4.	15:10:54
21	A.	Okay.	15:10:56
22	Q.	I want you to confirm that.	15:10:57
23	A.	Let me just -- 24 -- oh, yeah, 65.2 is the	15:11:04
24		highest. Yes, 19.4 percent.	15:11:10
25	Q.	So we have -- 20.3 in the enacted map,	15:11:11

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1	19.4 in A1, what about A2? And I promise this is	15:11:12
2	the last one, I won't make you do all of it.	15:11:17
3	A. It looks like 10.9 percentage points.	15:11:23
4	No, 20.9 percentage points.	15:11:31
5	Q. 20.9. Okay.	15:11:35
6	A. Yeah.	15:11:37
7	Q. So if McCartan map -- and McCartan's map,	15:11:38
8	you were asked to assume that those were drawn	15:11:43
9	without regard to partisanship as well as race,	15:11:44
10	right?	15:11:49
11	A. I do not -- I do not believe I was asked	15:11:49
12	to assume that Dr. McCartan's maps was drawn without	15:11:50
13	regard to partisanship. I don't think I state that	15:11:56
14	in my report. I believe I was -- I know I was told	15:11:59
15	to assume that they were not drawn with regard to	15:12:03
16	race.	15:12:07
17	Q. All right. Let me go back and share the	15:12:07
18	instruction letter that you received, and we'll see,	15:12:10
19	again, if we can get to the bottom of this.	15:12:12
20	So is this the letter that you received at	15:12:15
21	the outset of your work on the report that you	15:12:16
22	disclosed?	15:12:19
23	A. Yes.	15:12:20
24	Q. Okay. And in the third paragraph here, do	15:12:20
25	you see where it says -- it refers to the maps	15:12:25

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1	produced by another expert and it says:	15:12:28
2	These alternative maps were drawn	15:12:31
3	without reference to racial or political	15:12:32
4	data."	15:12:34
5	A. Yes.	15:12:34
6	Q. Okay. So do you take that to mean that	15:12:35
7	they were drawn without regard to partisanship?	15:12:39
8	A. Yes.	15:12:42
9	Q. Okay. All right. So if that -- if that's	15:12:42
10	the case, and Dr. McCartan's map A1 has a range of	15:12:46
11	19.4, and the enacted map has a range of 20.3, and	15:12:51
12	McCartan map A2 has a range of 20.9, is the enacted	15:12:57
13	map an outlier?	15:13:06
14	A. I don't -- I don't know if it's an	15:13:10
15	outlier, but it has a smaller spread than most of	15:13:12
16	his alternative maps.	15:13:18
17	Q. Okay. But not all, correct?	15:13:19
18	A. Not all.	15:13:21
19	Q. Okay. And it seems to be -- the spread	15:13:22
20	is 0.9 percentage points greater in than enacted map	15:13:28
21	than in A1.	15:13:38
22	A. You -- I have to go back and do this	15:13:45
23	again. 19.4 percentage points. Is that what we	15:13:47
24	said?	15:13:51
25	Q. Yes.	15:13:53

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1	A. So then, yes, the enacted map had a 0.9	15:13:54
2	percentage point larger spread.	15:14:00
3	Q. Okay. And then it has a -- and then A2	15:14:02
4	spread is 0.62 percentage points greater than the	15:14:05
5	enacted maps?	15:14:12
6	A. Yes.	15:14:15
7	Q. Okay. So the enacted map spread fits	15:14:16
8	pretty comfortably between two maps that were drawn	15:14:19
9	without regard to partisan data correct?	15:14:22
10	A. For the president -- for the 2020	15:14:26
11	presidential election, yes.	15:14:28
12	Q. Which is the only election that you	15:14:31
13	analyzed in paragraph 53 of your report.	15:14:33
14	A. Correct.	15:14:35
15	Q. Are you aware of any studies or	15:14:37
16	literature, or anything like that, that would	15:14:38
17	suggest that a spread of 20.3 percentage points	15:14:40
18	indicates that there was either partisan or racial	15:14:44
19	motivation in drawing the districts?	15:14:50
20	A. I am not aware of any studies that put a	15:14:53
21	specific number on it.	15:14:55
22	Q. Okay. Let's turn now -- I think that's	15:15:02
23	all the questions that I have on your initial	15:15:05
24	report, so we are making progress. Let's turn to	15:15:08
25	your rebuttal report, and I think this one will go	15:15:11

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1	quicker.	15:15:14
2	So let's go to paragraphs 19 and 20, and	15:15:17
3	this is where you address Dr. Gonzales' report.	15:15:20
4	Now, you mention two maps that are in	15:15:23
5	appendix B of your rebuttal report. Were these maps	15:15:26
6	provided to you by Dr. McCartan?	15:15:32
7	A. Yes.	15:15:34
8	Q. Do you know where he found them, or how he	15:15:35
9	created them, or where he --	15:15:39
10	A. They were provided to me by counsel, so I	15:15:42
11	didn't speak to him directly. But from my	15:15:43
12	understanding, they were generated from	15:15:45
13	Mr. Gonzales' report going through each section of	15:15:47
14	his report that he identifies as important	15:15:51
15	boundaries, and sort of just aggregating them up and	15:15:56
16	putting them into one single map.	15:15:58
17	Q. Okay. But you were not involved in the	15:16:00
18	process of creating the map?	15:16:02
19	A. I was not.	15:16:03
20	Q. Okay. And so, have you verified whether	15:16:04
21	Dr. -- I'm sorry, Mr. Gonzales actually says that	15:16:09
22	all of the roads that are identified in those maps	15:16:13
23	are clearly ascertainable and commonly understood	15:16:16
24	boundaries?	15:16:20
25	A. I did not.	15:16:22

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1	Q. Okay. So that was an assumption that was	15:16:25
2	given to you, I guess, by counsel?	15:16:27
3	A. That the map was correct?	15:16:31
4	Q. That the map reflects those boundaries	15:16:35
5	that Mr. Gonzales has opined are clearly	15:16:37
6	ascertainable in commonly understood boundaries?	15:16:41
7	A. Yes.	15:16:47
8	Q. Is a just to be clear, yes, that was an	15:16:48
9	assumption given to you, not something that you	15:16:51
10	independently determined or confirmed?	15:16:53
11	A. That is correct.	15:16:55
12	Q. Okay. Do you have any dispute with	15:16:55
13	Mr. Gonzales' conclusions with respect to any	15:17:06
14	specific roads that he mentions in his report?	15:17:09
15	A. I do not.	15:17:12
16	ATTORNEY JONES: Objection to form.	15:17:15
17	A. I do not.	15:17:16
18	Q. Are you personally familiar with or	15:17:26
19	knowledgeable about the roads that are specifically	15:17:29
20	mentioned in Mr. Gonzales' report?	15:17:32
21	A. I am not.	15:17:35
22	Q. Okay. Let's turn, in your rebuttal	15:17:38
23	report, to the heading that appears just above	15:17:40
24	paragraph 30. And it says:	15:17:48
25	"I disagree with Dr. Trende's opinion	15:17:55

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1	that my analysis does not demonstrate	15:17:58
2	that politics predominated in the	15:18:01
3	drawing of the maps."	15:18:04
4	Do you see that?	15:18:05
5	A. I do.	15:18:06
6	Q. Okay. So do you think that analysis does	15:18:07
7	demonstrate that politics predominate in the drawing	15:18:08
8	of the maps?	15:18:13
9	A. I think that my evidence and my analysis	15:18:14
10	is consistent with the idea that politics	15:18:17
11	predominated.	15:18:19
12	Q. Okay. Let's go to paragraph 30. And you	15:18:21
13	say beginning on the fourth row, you say:	15:18:35
14	"But he ignores" -- "he" meaning	15:18:40
15	Dr. Trende, "ignores the fact that there	15:18:42
16	is a clear improvement in Republican	15:18:43
17	performance in these districts over	15:18:47
18	time."	15:18:49
19	Do you see that?	15:18:50
20	A. Yes.	15:18:51
21	Q. Okay. And do you know whether there's a	15:18:52
22	clear improvement in Republican performance	15:18:53
23	throughout Miami-Dade over time?	15:18:55
24	A. I do not.	15:18:58
25	Q. Okay. If there's a clear improvement in	15:19:00

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1	Republican performance in the challenge districts	15:19:02
2	over time, do you know whether it would have been	15:19:04
3	possible to draw those ways -- those districts in a	15:19:07
4	way that doesn't reflect clear improvement in the	15:19:09
5	districts for Republican performance?	15:19:14
6	A. Can you --	15:19:16
7	ATTORNEY JONES: Objection to form.	15:19:17
8	A. Can you --	15:19:18
9	Q. That's right. So you're -- you've	15:19:19
10	expressed here that there's clear improvement in	15:19:21
11	Republican performance in the challenge districts	15:19:25
12	over time.	15:19:27
13	Do you know whether there's a way to draw	15:19:28
14	those challenge districts in a way that doesn't	15:19:29
15	reflect clear improvement in Republican performance	15:19:35
16	over time?	15:19:37
17	A. I do not know.	15:19:39
18	Q. Okay. Do you know whether that's also	15:19:40
19	true of Dr. McCartan's maps, that he would -- his	15:19:49
20	maps which show clear improvement in Republican	15:19:51
21	performance in the challenge districts?	15:19:55
22	A. No. So I think Table 6 of my initial	15:20:03
23	report has the -- all three elections and their	15:20:22
24	results including the alternative maps.	15:20:28
25	Q. Table 6, did you say?	15:20:41

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1	A. Yeah, Table 6 on page 20.	15:20:43
2	Q. Okay. And do -- does that table show that	15:21:00
3	there is clear improvement in Republican performance	15:21:03
4	in districts 26, 27, 28 in Dr. McCartan's maps?	15:21:07
5	A. Yes.	15:21:16
6	Q. Okay. In paragraph 32 of your rebuttal	15:21:16
7	report, you're referring to the statehouse districts	15:21:29
8	here, and you say in the last two lines that:	15:21:36
9	"There is significantly more variation	15:21:40
10	within the group of challenged districts	15:21:41
11	than in the enacted map, even if the	15:21:43
12	outer bounds were similar."	15:21:46
13	And I think you're referring here to the	15:21:48
14	HVAP?	15:21:51
15	A. Yes.	15:21:51
16	Q. Okay. And are you referring to -- so just	15:21:52
17	maps A1 and A2.	15:21:58
18	ATTORNEY BARDOS: Let me -- let me display	15:22:02
19	an exhibit, which is now in the chat. It's	15:22:03
20	Exhibit 14.	15:22:18
21	(Plaintiffs' Exhibit No. 14 was	15:22:18
22	marked for identification.)	15:22:18
23	Q. Okay. So these are the HVAPs of the	15:22:42
24	challenge districts ranked from highest to lowest.	15:22:44
25	So this is basically the range in distribution of	15:22:46

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1	HVAPs. And in each column, I rank them from highest	15:22:50
2	to lowest without regard to the district numbers,	15:22:54
3	but they come from the seven challenge districts.	15:22:57
4	So when you say there is significantly	15:23:00
5	more variation within the group of challenge	15:23:04
6	districts than in the enacted map, what -- what are	15:23:08
7	you referring to?	15:23:11
8	A. I'm referring to the fact that there's a	15:23:28
9	larger -- a larger range in maps A1 and A2 compared	15:23:30
10	to the enacted map.	15:23:35
11	Q. Okay. So are you talking just about the	15:23:37
12	outer bounds, meaning the highest and the lowest, or	15:23:40
13	is there something significant also about how the	15:23:43
14	HVAPs between the highest and the lowest are	15:23:46
15	distributed?	15:23:49
16	A. I was referring to the lowest, just	15:23:50
17	looking at the difference between the lowest and the	15:23:52
18	highest.	15:23:54
19	Q. Okay. So not -- not the HVAPs in between,	15:23:54
20	just the highest and lowest?	15:23:57
21	A. Right.	15:24:01
22	Q. Okay. Let's take a look at paragraph 36	15:24:16
23	of your rebuttal report, and specifically Table 1.	15:24:18
24	And as I understand it, this is part of your	15:24:22
25	response to Dr. Trende's assertion that your splits	15:24:25

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1 analysis, whether counties or municipalities or 15:24:33
2 VTDs, would also flag Dr. McCartan's congressional 15:24:37
3 maps as racial gerrymanders or as, you know, being 15:24:42
4 motivated by race. 15:24:49

5 And so, in Table 1, as I understand it, 15:24:51
6 you have three different comparisons. The first 15:24:55
7 compares the portion of Collier County in enact of 15:25:00
8 CD 26, to the portion of Collier County outside 15:25:07
9 enacted CD 26, I want to ask you initially about the 15:25:10
10 second comparison, which is the portion of 15:25:14
11 Miami-Dade County in enacted CD 26, versus the 15:25:16
12 portion of Miami-Dade County outside of enacted 15:25:21
13 CD 26. 15:25:26

14 And you would agree, would you not, that 15:25:28
15 in Dr. McCartan's maps, the portion of Miami-Dade 15:25:30
16 County that is enacted -- or that is in district 26 15:25:33
17 is greater than the portion that is outside of 15:25:37
18 district 26. 15:25:40

19 A. Except for map B2. 15:25:43

20 Q. It's greater there, but not just by as 15:25:47
21 much? 15:25:50

22 A. It's -- it's greater -- sorry, it's 15:25:55
23 greater. I thought we were comparing it to the 15:25:57
24 enacted plan. 15:26:00

25 Q. I'm sorry, just looking at McCartan's 15:26:00

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1	maps.	15:26:05
2	A. Yeah.	15:26:06
3	Q. The HVAP of -- the portion of Miami-Dade	15:26:06
4	County that's in district 26 is greater than the	15:26:07
5	portion of Miami-Dade County that is outside of	15:26:10
6	district 26.	15:26:15
7	A. Correct.	15:26:17
8	Q. And in doing your splits analysis, you	15:26:17
9	were not looking at the magnitude of difference	15:26:21
10	between the HVAP of the included portion and the	15:26:23
11	HVAP of the excluded portion, correct?	15:26:26
12	A. Correct.	15:26:29
13	Q. So under your analysis here, that would --	15:26:29
14	well, strike that.	15:26:37
15	Let's go to the third comparison.	15:26:38
16	"Portion of Miami-Dade County that is	15:26:41
17	within Hispanic-protected CDs."	15:26:44
18	And I take that to mean CDs 26, 27, and	15:26:45
19	28. Is that fair?	15:26:50
20	A. That's correct.	15:26:53
21	Q. So just looking at Dr. McCartan's maps,	15:26:54
22	would it be true that the portion of Miami-Dade	15:26:57
23	County that is in CDs 26, 27, and 28, has a higher	15:26:59
24	HVAP than the portion of Miami-Dade County that is	15:27:05
25	outside of those districts?	15:27:07

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1	A. That is correct.	15:27:09
2	Q. Okay. And the -- in the first comparison,	15:27:09
3	you show that the portion of Collier County in	15:27:16
4	challenge CD 26 is 31.8 percent HVAP.	15:27:19
5	Would you agree that that is -- reduces	15:27:24
6	the overall HVAP of an active CD 26 to take in a	15:27:26
7	portion of Collier County with only 31.8 HVAP?	15:27:32
8	A. I can't answer that question. I have to	15:27:37
9	look at the number of -- to compare the number of	15:27:39
10	voters compared to the alternative options.	15:27:41
11	Q. Okay. But if we just look at the portion	15:27:45
12	of CD 26 that comes from Miami-Dade County,	15:27:48
13	that's 80.3 percent HVAP, correct -- I'm sorry,	15:27:51
14	80.89 percent HVAP.	15:28:01
15	A. Yes.	15:28:04
16	Q. Okay. So if we add to that a population	15:28:04
17	in which is only 31.8 percent, that will bring that	15:28:06
18	district's HVAP down.	15:28:11
19	A. Yes.	15:28:14
20	Q. Okay. Turn, please, to paragraph 39 and	15:28:14
21	specifically Table 2.	15:28:50
22	And am I correct that, in Table 2, you	15:29:02
23	don't analyze splits of municipalities or CDPs	15:29:09
24	between district 26 and either district 27 or	15:29:17
25	district 28?	15:29:22

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1	A. That is -- so I'm looking at portions of	15:29:35
2	precincts -- sorry, portions of cities, or CDPs,	15:29:40
3	that are in either district 26 or 27 and comparing	15:29:44
4	them to districts 18 and 24.	15:29:48
5	Q. Okay. But if a municipality, or a CDP, is	15:29:52
6	split between district 26 and 27, it wouldn't show	15:29:56
7	up in this table?	15:30:00
8	A. Correct.	15:30:03
9	Q. And, likewise, if a municipality, or a	15:30:04
10	CDP, is split between district 26 and district 28,	15:30:06
11	it wouldn't show up in this table, correct?	15:30:10
12	A. Actually, I think City of Miami here is	15:30:16
13	split between 26, 27, and 24, and I do have that	15:30:22
14	represented in the table.	15:30:27
15	Q. Okay. Is that showing up only because	15:30:29
16	it's also split with district 24?	15:30:31
17	A. As opposed to if it hadn't been, would it	15:30:37
18	have appeared in my table?	15:30:41
19	Q. Right.	15:30:42
20	A. I don't -- I don't know the answer to	15:30:44
21	that.	15:30:45
22	Q. Okay. So in -- moving on to paragraph 42,	15:30:46
23	Table 3, you incorporate here into your VTD splits	15:31:00
24	analysis, VTDs with populations under 100, correct?	15:31:08
25	A. Correct.	15:31:12

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1 Q. Okay. Do you have a preference between 15:31:13
2 including or excluding VTDs with populations under 15:31:16
3 100? Do you think one is the better way to do it 15:31:19
4 versus the other? 15:31:23

5 A. I don't -- I don't know that it's better. 15:31:29
6 It's just that when you have very few voters in an 15:31:31
7 area, it -- there's less meaning in what the results 15:31:33
8 are showing. 15:31:37

9 Q. Okay. And so, did -- I mean, if you were 15:31:41
10 to kind of go back in time and redo things, would 15:31:47
11 you present it with the VTDs that would have fewer 15:31:50
12 than 100, or would you present it the way that you 15:31:56
13 did in your report? 15:32:01

14 A. I don't -- I don't have any strong opinion 15:32:02
15 either way. 15:32:04

16 Q. Okay. No problem. Paragraphs 44 and 45. 15:32:05
17 This is where you're responding to Dr. Trende's 15:32:14
18 response to your -- to your VTD-splits analysis. 15:32:23
19 And specifically, you're addressing the probability 15:32:29
20 analysis for maps B1 and B2 in paragraphs 44 and 45. 15:32:35

21 Did you also do the probability analysis 15:32:48
22 for Dr. McCartan's other four maps? 15:32:50

23 A. I did not. 15:32:53

24 Q. Okay. Is there any reason why? 15:32:54

25 A. Dr. Trende did not do the analysis for any 15:32:57

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1 specific alternative maps in his report. So I just 15:33:00
2 sort of just picked two maps that I felt would be 15:33:06
3 representative or would be an example of why I 15:33:11
4 disagreed with him. 15:33:16

5 Q. Okay. And then in Tables 5 and 6, it 15:33:18
6 looks like you present your VTD-splits analysis for 15:33:25
7 Dr. McCartan's maps B1 and B2, but you don't present 15:33:32
8 tables for Dr. McCartan's maps A, C1, C2, and D; is 15:33:38
9 that correct? 15:33:44

10 A. This is Table 6 and 7, not 5 and 6, 15:33:45
11 correct? 15:33:48

12 Q. You are correct, 6 and 7. 15:33:55

13 A. Yes, Table 6 presents Dr. McCartan's B1 15:33:57
14 map, and Table 7 presents B2. 15:34:02

15 Q. Okay. But you didn't do the analysis for 15:34:06
16 the other four McCartan maps? 15:34:08

17 A. That is correct. 15:34:13

18 Q. In Table 5, the left-hand column says: 15:34:17

19 "CD 26 VTD." 15:34:22

20 Do you see that? 15:34:26

21 A. Yeah. 15:34:32

22 Q. And in Table 6 and 7, the left-hand column 15:34:32
23 says: 15:34:35

24 "Protected Hispanic district." 15:34:36

25 And it sometimes -- in Table 6, for 15:34:43

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1	example, it includes district 27 as well as 26.	15:34:45
2	Is there a reason that you did that	15:34:49
3	differently?	15:34:51
4	A. No, I think I was just trying to be	15:34:58
5	thorough.	15:35:03
6	Q. Okay. But it -- so I guess, too, if we	15:35:04
7	were just looking at just -- just at district 26, we	15:35:08
8	could -- we could still find that information within	15:35:11
9	Tables 6 and 7. We would just ignore the rows for	15:35:13
10	the other districts.	15:35:17
11	A. Correct.	15:35:18
12	Q. Okay.	15:35:19
13	Okay. Paragraph 50 on page -- well, no	15:35:33
14	page number -- you talk about the in-out analysis,	15:35:38
15	the people that were moved into district 26 who had	15:35:43
16	not been in the benchmark district and the people	15:35:46
17	who were moved out of the district moving from the	15:35:49
18	benchmark to the inactive plan.	15:35:53
19	I just want to be -- see whether we can	15:35:58
20	get agreement on the numbers that were presented in	15:36:01
21	Dr. Trende's report.	15:36:04
22	So if you have Dr. Trende's report, if you	15:36:05
23	could go to page 89. And if you have haven't	15:36:08
24	confirmed these numbers, that's fine. I just want	15:36:15
25	to see whether you have.	15:36:18

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1	A.	Are you referring to Table 8 -- the 7.2?	15:36:20
2	Q.	So I'm referring, in paragraph 50,	15:36:31
3		specifically to the 135,175 people who were moved	15:36:33
4		out of the district.	15:36:38
5		I'm sorry, page 89.	15:36:51
6	A.	Okay. Eighty-nine.	15:36:54
7	Q.	I was confusing two reports.	15:36:56
8	A.	Okay. So it says:	15:36:58
9		"Second, if we examine other populations	15:37:00
10		place of other districts, 135,175 of	15:37:02
11		voting age were moved out of benchmark	15:37:05
12		district, 25."	15:37:06
13		What's the question?	15:37:10
14	Q.	So that figure, 135,175 people, have you	15:37:13
15		confirmed the accuracy of that figure?	15:37:20
16	A.	I have not. But if you add up -- in my	15:37:22
17		Table 8, if you add up the total VAP moved out of	15:37:26
18		district 25, hopefully those numbers would be the	15:37:34
19		same.	15:37:36
20	Q.	Okay. In Table 8 of your rebuttal report,	15:37:37
21		how did you find that data? What was your source	15:37:41
22		for that data?	15:37:44
23	A.	It was contained in Dr. Trende's	15:37:49
24		production materials.	15:37:51
25	Q.	Okay. All right.	15:37:52

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1	I think that's it for the rebuttal report.	15:37:59
2	Let me just ask you some general questions as we	15:38:00
3	wind down here.	15:38:03
4	What would you -- how would you describe	15:38:05
5	your area of expertise?	15:38:06
6	A. My area of expertise is American politics,	15:38:11
7	particularly state and local politics, institutions,	15:38:15
8	elections, voting behavior, voters.	15:38:19
9	Q. Okay. You served an errata, I think,	15:38:25
10	yesterday, maybe Friday.	15:38:30
11	Apart from that, have you identified any	15:38:33
12	errors in your report or is -- or are all of the	15:38:35
13	errors that you've found in that errata that you	15:38:41
14	provided on Friday?	15:38:44
15	A. All of the errors that I've found were	15:38:46
16	provided in the errata.	15:38:48
17	Q. Okay. Have you read any of the expert	15:38:49
18	reports prepared by the plaintiffs' other experts,	15:38:52
19	Dr. Walker, Dr. McCartan, Dr. Puello? ^	15:38:54
20	A. I have not.	15:39:01
21	Q. Have you performed, in the course of your	15:39:03
22	work in this case, any analyses that you did not	15:39:06
23	include in your report?	15:39:09
24	A. It's possible. But nothing I can recall	15:39:14
25	specifically.	15:39:17

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1	Q. Okay. Nothing comes to mind?	15:39:19
2	A. No.	15:39:20
3	Q. Are you currently working on any analyses,	15:39:31
4	or do you have any plans to work on any analyses, in	15:39:34
5	the -- in the context of this litigation?	15:39:36
6	A. I do not.	15:39:39
7	Q. Do you -- I don't -- I don't see in your	15:39:50
8	report that you're contending this, but I just want	15:39:53
9	to be sure: You're not suggesting, when you talk	15:39:55
10	about VTD splits or splits of municipalities and	15:39:58
11	CDPs, that the legislature split more	15:40:01
12	municipalities, CDPs, or VTDs in drawing the	15:40:07
13	challenge districts than it split in drawing	15:40:10
14	unchallenged districts in the enacted maps?	15:40:14
15	A. No, I'm not saying that.	15:40:17
16	Q. Okay. What is your hourly rate in this	15:40:19
17	case?	15:40:23
18	A. \$175.	15:40:24
19	Q. Okay. Do you know approximately how many	15:40:26
20	hours you've worked so far?	15:40:28
21	A. I think it's between 40 and 60.	15:40:31
22	Q. Okay. And you are a Democrat?	15:40:34
23	A. Are you asking me if I'm registered as a	15:40:44
24	Democrat?	15:40:46
25	Q. Yes.	15:40:48

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1	A.	Yes, I'm a registered Democrat.	15:40:49
2	Q.	And you would describe yourself as both a	15:40:53
3		liberal and a progressive?	15:40:55
4	A.	I don't like the "progressive" term. I	15:40:56
5		would describe myself as a liberal.	15:40:57
6	Q.	Okay. What don't you like about the	15:41:00
7		"progressive" term?	15:41:02
8	A.	It's not -- there are associations with	15:41:03
9		that term that I don't necessarily agree with.	15:41:07
10	Q.	Okay. What would be an example of that?	15:41:10
11	A.	I -- there are certain policy positions	15:41:13
12		that I don't agree with. People who call themselves	15:41:18
13		progressives necessarily, they tend to be more of	15:41:22
14		the left-wing of the Democrat parties.	15:41:27
15	Q.	Okay. Have you ever described yourself as	15:41:30
16		a progressive?	15:41:32
17	A.	I -- I don't -- I don't know. I don't	15:41:35
18		recall.	15:41:37
19	Q.	Okay. Do you have an X account?	15:41:38
20	A.	Oh, to -- yes, I do that.	15:41:44
21	Q.	Okay. Do you recall why you've called	15:41:46
22		yourself a progressive on X?	15:41:49
23	A.	I don't recall, no.	15:41:50
24	Q.	Okay. Let's see.	15:41:52
25		Okay. Does this look like you, your X	15:42:26

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1	account?	15:42:30
2	A. Yes.	15:42:31
3	Q. Is this something that you wrote where you	15:42:33
4	said the privilege you are oozing with the word	15:42:34
5	"choosing":	15:42:39
6	"I am a liberal and a progressive."	15:42:41
7	A. Yeah, I guess so. I don't really remember	15:42:45
8	writing this but sure. Okay.	15:42:48
9	Q. Okay. So this is something --	15:42:51
10	ATTORNEY JONES: I don't think you've	15:42:54
11	identified the exhibit number.	15:42:55
12	ATTORNEY BARDOS: This is 16.	15:42:59
13	(Plaintiffs' Exhibit No. 16 was	15:42:59
14	marked for identification.)	15:42:59
15	ATTORNEY JONES: Maybe we just can't see	15:43:01
16	it on the screen.	15:43:02
17	ATTORNEY BARDOS: Oh, you can't see it?	15:43:03
18	ATTORNEY JACKSON: It's in the chat, too.	15:43:07
19	I can see it.	15:43:09
20	ATTORNEY JONES: Go ahead. Sorry.	15:43:10
21	Q. Okay. All right. So you did say -- and	15:43:11
22	this was posted in July of 2023, correct?	15:43:12
23	A. Yeah, it looks to be. Yes.	15:43:16
24	Q. And you said here:	15:43:18
25	"I am a liberal and a progressive."	15:43:19

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1	A.	That it what it says on the screen, yes.	15:43:21
2	Q.	And "pro-bikes."	15:43:24
3	A.	I believe this was in response to a --	15:43:27
4		this may have been in response to a specific	15:43:31
5		political candidate's posting -- or a political	15:43:35
6		official's posting.	15:43:38
7	Q.	Well, no disagreement on the pro-bikes	15:43:40
8		part.	15:43:42
9		ATTORNEY BARDOS: I'm going to stop	15:43:43
10		sharing this.	15:43:43
11	Q.	Now, do you also have a Facebook account?	15:43:44
12	A.	I do.	15:43:48
13	Q.	Okay. And you're no fan of Donald Trump,	15:43:52
14		correct?	15:43:54
15	A.	I did not vote for him.	15:43:55
16	Q.	Okay.	15:43:57
17		ATTORNEY BARDOS: Let me share another	15:44:07
18		exhibit.	15:44:09
19		(Plaintiffs' Exhibit No. 17 was	15:44:09
20		marked for identification.)	15:44:09
21	Q.	Okay. Is this your Facebook account?	15:44:18
22	A.	Yes.	15:44:20
23	Q.	Okay. And this is something that you	15:44:21
24		posted, right?	15:44:23
25	A.	I don't think I posted it, but I think it	15:44:29

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1	was a background image or something.	15:44:32
2	Q. It says here that you updated -- that you	15:44:35
3	updated your cover photo.	15:44:37
4	A. Yeah, I don't -- I don't think that was a	15:44:38
5	post, but it was an updating of the cover photo,	15:44:40
6	yes.	15:44:43
7	Q. Okay. So it is your cover photo that you	15:44:44
8	put on X, right?	15:44:47
9	A. This is Facebook.	15:44:49
10	Q. I'm sorry, Facebook.	15:44:50
11	A. Yes.	15:44:51
12	Q. Yes. Okay. And -- and so this is meant	15:44:52
13	to depict Donald Trump, right?	15:44:55
14	A. It is Donald Trump, yes.	15:44:57
15	Q. Well, it's -- I mean, it's not --	15:44:59
16	A. It's meant to depict Donald Trump, yes.	15:45:01
17	Q. And the assailant here is Count from	15:45:05
18	Sesame Street, right?	15:45:09
19	A. It certainly is.	15:45:11
20	Q. Is there any kind of rhyme or reason to	15:45:13
21	why it's the Count? Like, is there some sort of	15:45:14
22	hidden meaning as to why the Count would be in this	15:45:17
23	picture?	15:45:22
24	A. I think this was a reference to the fact	15:45:23
25	that counted all of the ballots, and the Count won	15:45:24

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1	out at the end of the day.	15:45:28
2	Q. Gotcha. Okay.	15:45:29
3	And it looks like that the president is	15:45:29
4	taking a pretty hard hit in this image, right, would	15:45:32
5	you say? Would you agree with that?	15:45:34
6	A. Sure.	15:45:37
7	Q. I mean, it looks like he's missing a	15:45:37
8	tooth.	15:45:39
9	A. I don't know about that.	15:45:40
10	Q. Right there, there's, like, a gap. Do you	15:45:41
11	see that?	15:45:42
12	A. Okay.	15:45:44
13	Q. Do you think that it was this punch that	15:45:45
14	knocked out that tooth?	15:45:47
15	A. I cannot speculate.	15:45:48
16	Q. Okay. I won't ask you to speculate.	15:45:51
17	What about these particles here, is that	15:45:55
18	his shattered tooth, or what's that?	15:45:58
19	A. I have no idea.	15:46:01
20	Q. And he looks like he's in a lot of pain,	15:46:03
21	like his eyes are closed. Do you see that?	15:46:05
22	A. I don't know his feelings in the moment,	15:46:07
23	but...	15:46:10
24	Q. Why -- why did you post this image?	15:46:10
25	A. I think that I was pleased that Donald	15:46:13

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1	Trump did not win the election.	15:46:18
2	Q. Mm-hmm.	15:46:21
3	Do you think that treating violence	15:46:23
4	against political figures in this sort of humorous	15:46:26
5	way tends to normalize or encourage it?	15:46:29
6	A. I don't, no. It's a cartoon character.	15:46:33
7	Q. Right. But when after President Trump was	15:46:41
8	shot in Butler, Pennsylvania, did you ever think	15:46:45
9	about taking this down?	15:46:48
10	A. I don't even think it's my current cover	15:46:50
11	photo, so.	15:46:52
12	Q. Well, I found it. I found it on your	15:46:53
13	Facebook page.	15:46:55
14	A. I don't think it's currently my cover	15:46:57
15	photo. I think it -- whatever it is -- I don't	15:46:58
16	believe it is, but I -- there was nothing to take	15:47:00
17	down, as far as I understand. And, no, it was a	15:47:04
18	political cartoon. Cartoons have had a long history	15:47:08
19	of political commentary.	15:47:12
20	Q. Mm-hmm. And you agree that humor can be	15:47:15
21	used to kind of normalize things that otherwise, if	15:47:18
22	you say it directly, like you wouldn't -- you	15:47:22
23	wouldn't ever do?	15:47:25
24	ATTORNEY JONES: Objection to form, and	15:47:27
25	relevance, obviously.	15:47:29

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1	A. I'm not sure I understand the question.	15:47:32
2	Q. Okay. But you don't condone political	15:47:33
3	violence against President Trump, right?	15:47:41
4	A. Of course not.	15:47:43
5	Q. You wouldn't be in favor that.	15:47:44
6	A. Of course not.	15:47:46
7	Q. You just feel very strongly that he's not	15:47:48
8	the right guy for the job.	15:47:50
9	A. I -- that is of my -- that is my opinion.	15:47:52
10	Q. Okay. All right.	15:47:55
11	ATTORNEY BARDOS: All right. Let me take	15:47:58
12	a -- let's take a quick ten-minute break here.	15:47:58
13	I might be done. No promises, but I might be	15:48:01
14	done. But let's reconvene in ten minutes if	15:48:04
15	that's okay.	15:48:11
16	THE COURT REPORTER: The time is 3:48, and	15:48:21
17	we're off the record.	15:48:24
18	(Recess.)	15:48:25
19	THE COURT REPORTER: The time is 15:58	15:58:44
20	Eastern Time, and we are back on the record.	15:58:48
21	Q. Okay. Dr. Abbott, just a few more	15:58:53
22	questions.	15:58:58
23	Did you read the entirety of Dr. Trende's	15:58:58
24	report?	15:59:01
25	A. I did.	15:59:02

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1	Q.	Okay. And how about Mr. Gonzales' report?	15:59:04
2	A.	I did.	15:59:07
3	Q.	You read that in full?	15:59:07
4	A.	I did not read his appendices with the	15:59:09
5		sources.	15:59:12
6	Q.	Okay. Have you -- let me ask you about	15:59:13
7		this -- about your rebuttal report in paragraph 21.	15:59:16
8		There's a statement I'd like to ask you about.	15:59:20
9	A.	Okay.	15:59:36
10	Q.	And so paragraph 21 rolls over to a second	15:59:37
11		page, and it's on a second page, second line. It	15:59:40
12		says:	15:59:42
13		"It is unlikely other districts not	15:59:44
14		touching district 26 would need to be	15:59:46
15		changed significantly, if at all, if	15:59:49
16		district 26 were redrawn."	15:59:52
17		Do you see that?	15:59:55
18	A.	Yes.	15:59:56
19	Q.	And do you believe that to be true?	15:59:56
20	A.	I believe that to be true.	16:00:00
21	Q.	Okay. And why do you believe that to be	16:00:01
22		true?	16:00:03
23	A.	If we're focusing on the border of	16:00:05
24		district 26, you know, thinking about how other	16:00:07
25		districts and other parts of the state that do not	16:00:10

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1	touch the border with district 26 would be affected,	16:00:13
2	there would be second-order effects.	16:00:18
3	Q. Okay. So do you have an opinion on how	16:00:20
4	many districts would need to be changed if	16:00:23
5	district 26 were redrawn?	16:00:24
6	A. It depends on how the border would change.	16:00:32
7	Q. Okay. I think you said something like	16:00:35
8	second -- secondary effects?	16:00:39
9	A. Second order.	16:00:42
10	Q. Second order.	16:00:43
11	What do you mean by that?	16:00:45
12	A. I mean, if district 26 -- the border of	16:00:47
13	district 26 were changed, then whatever contiguous	16:00:50
14	district that is touching that border that is	16:00:55
15	changed will change, and potentially, depending on	16:00:57
16	how it's changed, a district that borders that	16:01:00
17	changed district will also need to be changed.	16:01:04
18	Q. Okay. And -- and so when you say that	16:01:07
19	it's unlikely other districts not touching	16:01:09
20	district 26 would need to be changed significantly,	16:01:11
21	if at all, if district 26 were redrawn, are you	16:01:15
22	including those second-order changes in that	16:01:19
23	statement?	16:01:22
24	A. If a district that does not touch	16:01:24
25	district 26 needs to be changed because a district	16:01:28

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1	that does touch district 26 is changed, that change	16:01:31
2	will be smaller than the change of the contiguous	16:01:36
3	district.	16:01:39
4	But it's also the case that not every	16:01:39
5	district may need to be changed that touches	16:01:42
6	district 26, and in those cases, anything that	16:01:45
7	touches the contiguous district with district 26	16:01:48
8	will not change at all.	16:01:53
9	Q. Go ahead -- have you ever lived in	16:01:56
10	Florida?	16:01:58
11	A. No.	16:01:59
12	Q. Okay. And so I take it, then, you never	16:02:01
13	have voted in Florida either?	16:02:02
14	A. That is correct.	16:02:05
15	ATTORNEY BARDOS: That is all the	16:02:07
16	questions I have. So I don't know if anyone	16:02:08
17	else on -- I think we have some lawyers for the	16:02:11
18	Secretary of State's office. I don't know if	16:02:16
19	they have questions. But otherwise, Patrick,	16:02:17
20	if you do, then the floor is yours.	16:02:19
21	ATTORNEY RABAN: No questions from the	16:02:25
22	secretary. We don't have any questions.	16:02:26
23	ATTORNEY JONES: I don't have any	16:02:31
24	questions. I did want to make one statement or	16:02:32
25	objection on the record that I meant to state	16:02:35

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1	earlier. My understanding is this Zoom has	16:02:37
2	been recorded, but the deposition was not	16:02:41
3	noticed to be recorded by video-graphic means.	16:02:44
4	My understanding is that the recording will	16:02:47
5	just be used for stenographic purposes, and to	16:02:49
6	the extent that anyone tries to used use it for	16:02:52
7	any other basis, we would object to that.	16:02:56
8	ATTORNEY BARDOS: And the recording was	16:02:58
9	not done specifically at our request, and we	16:03:00
10	have no intention for using it. Obviously, if	16:03:03
11	it's helpful to the court reporter in preparing	16:03:06
12	the transcript, then I guess, that's -- that	16:03:09
13	would be a use it serves, but we're not	16:03:10
14	planning to use the recording ourselves. We	16:03:13
15	would just use the transcript.	16:03:14
16	ATTORNEY JONES: Yup. Thank you for	16:03:17
17	confirming. We have no problem with it being	16:03:17
18	used for that purpose.	16:03:20
19	ATTORNEY BARDOS: Well, great. If there's	16:03:22
20	nothing else, Dr. Abbott, it was a pleasure to	16:03:24
21	meet you. Thanks for spending so much of your	16:03:28
22	day with us. We really appreciate your time.	16:03:30
23	THE COURT REPORTER: Are we off the	16:03:40
24	record?	16:03:41
25	We are off the record, right?	16:03:42

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1 (Proceedings concluded at 1603

16:03:42

2 EST.)

16:03:42

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ACKNOWLEDGMENT OF DEPONENT

I, CAROLYN B. ABBOTT, PH.D., do hereby
acknowledge that I have read and examined the
foregoing testimony and the same is a true, correct,
and complete transcription of the testimony given by
me and any corrections appear on the attached errata
sheet signed by me.

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CERTIFICATE OF SHORTHAND REPORTER

NOTARY PUBLIC

I, STANLEY H. SAKAI, CRC, 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 requested [or not requested, as appropriate]; and that I am neither counsel for, 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 hereunto set my hand and affixed my notarial seal this 11TH day of JULY, 2025.



STANLEY H. SAKAI, CRC

FOR THE STATE OF NEW YORK

My Commission Expires: JUNE 23, 2026

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