

**In the Matter Of:**

**KETO NORD HODGES vs ALBRITTON**

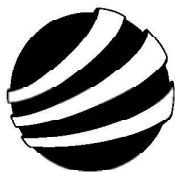
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**CORY MCCARTAN, PH.D.**

*December 02, 2024*

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1 IN THE UNITED STATES DISTRICT COURT  
2 MIDDLE DISTRICT OF FLORIDA  
3 TAMPA DIVISION  
4 CASE NO. 8:24-cv-879

5 KETO NORD HODGES, et al.,

6 Plaintiffs,

7 vs.

8 BEN ALBRITTON, et al.,

9 Defendants.

10 \_\_\_\_\_/

11 VIDEOCONFERENCE DEPOSITION OF CORY McCARTAN, Ph.D.  
12 Appearing Remotely Via Videoconference from  
13 University Park, Pennsylvania 16802

14 Taken By Counsel for Defendants  
15 (Pages 1-80)

16 Monday, December 2, 2024  
17 2:34 p.m. - 4:24 p.m.

18 HELD REMOTELY  
19 VIA VIDEOCONFERENCE

20  
21  
22 Stenographically Reported By:  
23 Jennifer Figueroa, RPR, FPR  
24 Notary Public, State of Florida at Large  
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1 Videoconference Telephonic Deposition  
2 stenographically reported by Jennifer Figueroa,  
3 Registered Professional Reporter and Notary Public in  
4 and for the State of Florida at Large, in the above  
5 cause.

6 \* \* \* \* \*

7 (Mr. Thomas is not present.)

8 THE COURT REPORTER: Do you swear or affirm  
9 that the testimony you're about to give will be the  
10 truth, the whole truth, and nothing but the truth?

11 THE WITNESS: I do.

12 THE COURT REPORTER: And you are currently  
13 located in University Park, Pennsylvania, with a  
14 ZIP Code of 16802. Is that correct?

15 THE WITNESS: That's right.

16 THE COURT REPORTER: Thank you so much.  
17 Counsel, you may proceed.

18 THEREUPON,

19 CORY MCCARTAN, Ph.D.,  
20 having been first duly sworn or affirmed, was examined  
21 and testified as follows:

22 MS. PRICE: Thank you, Madam Court Reporter.

23 DIRECT EXAMINATION

24 BY MS. PRICE:

25 Q. Hello, Dr. McCartan. How are you doing this

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1 afternoon?

2 A. Well, thanks. How about you?

3 Q. Good, thank you.

4 My name is Tara Price. I'm counsel for the  
5 Florida Senate for President Albritton, and I'll be  
6 questioning you today.

7 Would you mind stating your full name for the  
8 record, please?

9 A. Yes. It's Cory McCartan.

10 Q. And I previously stated this, but on the  
11 record could you just identify where you're presently  
12 located?

13 A. I'm in University Park, Pennsylvania.

14 Q. Thank you.

15 Dr. McCartan, have you had your deposition  
16 taken before?

17 A. Yes.

18 Q. Are you familiar with the general ground  
19 rules?

20 A. Yes.

21 Q. Okay. I'll go over them just so we touch on  
22 them, but I'll do it quickly since you said you're  
23 familiar.

24 You understand today your testimony is under  
25 oath and you have an obligation to tell the truth, just

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1 as if you were in a court of law?

2 A. Yes.

3 Q. And when you respond to my questions, as you  
4 are doing now, you'll need to make sure that you say  
5 "yes" or "no" instead of nodding or shaking your head,  
6 especially since we're on Zoom.

7 Do you understand that?

8 A. I do.

9 Q. And if for any reason you don't understand my  
10 question, will you agree to let me know so that I can  
11 explain it or rephrase it?

12 A. Yes.

13 Q. Okay. Thank you.

14 So in light of that, is it fair for me if you  
15 understand my question that I can assume you understood  
16 what I'm asking you?

17 A. Yes.

18 Q. And, you know, today is not a test. So if you  
19 don't know the answer to one of the questions, it's not  
20 like when you're students, just let me know, that's  
21 fine, and we can move on to the next question.

22 Do you understand?

23 A. I do.

24 Q. Thank you.

25 And if you need a break, let me know. I know

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1 that we're only here for two hours today, so I'd like to  
2 kind of power through it and hopefully cover as much  
3 ground as possible. But I understand and feel free to  
4 ask for a break if you need one. I would just ask that  
5 if there's a question pending, you answer the question  
6 that's on the table and then we can take a break  
7 afterwards.

8 A. I understand.

9 Q. Great.

10 Is there any reason why you wouldn't be able  
11 to testify completely and truthfully today?

12 A. There is not.

13 Q. Okay. So you're not feeling sick or  
14 physically ill or under the influence of anything that  
15 might affect your participation today?

16 A. No.

17 Q. Thank you so much.

18 And since we're doing the deposition via Zoom  
19 I have to ask a couple of questions.

20 You previously spoke with the court reporter,  
21 but is there anyone else in the room with you today?

22 A. There is not.

23 Q. And do you have any materials or notes in  
24 front of you?

25 A. I have a printed copy of the report I

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1 submitted in this case.

2 Q. Okay. Is that the only document that you have  
3 in front of you?

4 A. Yes.

5 Q. Okay. Do you have any writing or notes or  
6 comment on the printed copy of your report?

7 A. No.

8 Q. What about any highlighting?

9 A. No.

10 Q. It's the same exact copy of the report we  
11 would have received from plaintiffs' counsel in this  
12 case.

13 A. Yes.

14 Q. Is that correct?

15 A. (Moves head up and down.)

16 Q. Okay. Are there any other documents or emails  
17 or text or any other communications in front of you?

18 A. No.

19 Q. Okay. Dr. McCartan, can you tell us who hired  
20 you to participate in the lawsuit.

21 (Mr. Thomas entered the videoconference.)

22 A. I was retained by the American Civil Liberties  
23 Union of Florida.

24 BY MS. PRICE:

25 Q. Okay. Do you remember when you were first

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1 contacted?

2 A. Not exactly. I was contacted while retained  
3 on another separate case. So sometime in late 2023, I  
4 believe.

5 Q. Okay. Were you aware -- well, I guess since  
6 this is 2023, the lawsuit didn't exist then.

7 And you mentioned that you were retained by  
8 other litigation. Can you tell me what that litigation  
9 was that you were currently working on then for the  
10 ACLU?

11 A. I believe it was called GRACE, Inc., versus  
12 City of Miami.

13 Q. Okay. What were you retained to do in that  
14 case?

15 A. I calculated various population and  
16 demographic statistics of some districts and maps that  
17 were at issue in that case.

18 Q. Okay. Have you been hired by the ACLU for any  
19 other cases?

20 A. The ACLU of Florida?

21 Q. Yes.

22 A. Yes. I don't remember the caption but there  
23 is a -- a case that's been filed regarding congressional  
24 and state Senate districts that I've been retained to do  
25 work on.

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1 Q. Okay. Do you know where that was filed?

2 A. I believe the Miami division.

3 Q. Okay. Anything else?

4 A. Other cases? No.

5 Q. Okay. I'm going to go ahead and pull up your  
6 CV that we were provided. We'll do a share screen so  
7 you can take a look. All right. Technical  
8 difficulties.

9 MS. PRICE: Now let's start with the top so we  
10 can see -- there you go. Just slowly scroll down.

11 BY MS. PRICE:

12 Q. It looks like this is five pages. Does this  
13 look like a true and accurate copy of your CV, Doctor?

14 A. Yeah. This is an updated version since the  
15 report was first filed, but this looks to be -- this  
16 looks to be accurate.

17 MS. PRICE: Let's go ahead and mark this as  
18 Exhibit 1.

19 (Exhibit 1 will be marked for identification  
20 and attached to the transcript once received by the  
21 reporter.)

22 BY MS. PRICE:

23 Q. And then on Page 5 it looks like you list some  
24 experiences where you've been retained by --

25 MS. PRICE: Scroll down.

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1 BY MS. PRICE:

2 Q. -- the ACLU. Does that refresh your  
3 recollection as to other cases in which you've been  
4 retained?

5 A. Well, these list cases where I testified by  
6 deposition or at trial or submitted reports. So the  
7 case I mentioned for the ACLU of Florida the report has  
8 not been yet submitted.

9 Q. Right. These are other cases though?

10 A. With the National ACLU and the Florida  
11 affiliate, that's correct.

12 Q. Okay. So we've got GRACE. I'm not sure how  
13 to say "Nairne," I butchered that; I believe the Women  
14 Voters versus Ohio; and the Miami case in which you said  
15 there wasn't a report due; and then this case, all are  
16 ACLU. Is that correct?

17 A. Or its affiliates.

18 Q. Or its affiliates. Okay.

19 Have you ever been retained in a case where  
20 the ACLU or its affiliates appeared on the other side,  
21 you're testifying against them?

22 A. No.

23 Q. Okay.

24 MS. PRICE: And then if you can scroll up just  
25 a little bit.



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1 BY MS. PRICE:

2 Q. It looks like you have a couple of cases on  
3 behalf of the NAACP Legal Defense Fund?

4 A. Yes.

5 Q. Can you tell us a little bit about those?

6 A. Two cases which I've submitted reports or  
7 testified they're listing there. McClure is ongoing.

8 Q. Have you ever been retained as an expert  
9 witness in a case where the NAACP Legal Defense Fund or  
10 any of its affiliates were on the other side?

11 A. No.

12 MS. PRICE: Can you just scroll down a little  
13 bit.

14 BY MS. PRICE:

15 Q. And then the part that says "Data for  
16 Progress," can you tell me a little bit about what that  
17 is?

18 A. They're a nonprofit based in D.C. that  
19 conducts polling and issue adequacy. I was retained by  
20 them to forecast the results of the 2022 midterm  
21 elections.

22 Q. Do you know whether they work to advance  
23 either Republican or Democratic interests?

24 A. I think my understanding is they're a 501(c)3.  
25 I don't think they're a (c)4, but I'm not sure about

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1 that. So I don't think they're explicitly a partisan  
2 organization, to my knowledge. I'm not familiar with  
3 their mission statement.

4 Q. Okay. So you don't know that organization  
5 well enough to know whether it advances democratic or  
6 republican interests?

7 A. Well, I took you -- I took you to mean by  
8 "democratic interest," you know, advocacy on the  
9 democratic party particularly. So there are other  
10 political or -- interests that, you know, would overlap  
11 in some cases and not in others that would not be  
12 described, you know, as Democratic or Republican  
13 interest.

14 So to the best of my knowledge it's not a  
15 democratic organization the way, you know, the  
16 D triple-C is.

17 Q. How would you describe it?

18 A. A think-tank issue adequacy organization. It  
19 conducts polling, you know, broadly upon what they would  
20 consider progressive causes.

21 Q. And coming up to this lawsuit, can you  
22 describe what you were asked to do in this case?

23 A. Sure.

24 I was retained to redraw a portion of the  
25 Florida Senate district map in the Tampa area and write

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1 a report describing my changes.

2 Q. All right. Are you familiar with the term  
3 "benchmark plan"?

4 A. Sorry, let me stop you there. I realized  
5 my -- answered this question now, I misspoke earlier in  
6 describing the other ongoing case with the ACLU of  
7 Florida. It deals with congressional and house  
8 districts, not congressional and state Senate districts.

9 Q. Okay.

10 A. To answer your question, I'm not sure I  
11 understand what you mean and -- without more context  
12 about what you mean by "benchmark plan."

13 Q. You never heard the term "benchmark map" or  
14 "benchmark plan"?

15 A. I've probably used the phrase "benchmark," I'm  
16 talking about a plan in some context, but probably not  
17 the way that -- or maybe not the way you're thinking of.

18 So no, without context, I'm not sure what that  
19 means.

20 MS. PRICE: Okay. Let's pull up the benchmark  
21 plan.

22 BY MS. PRICE:

23 Q. Doctor, I'm going to show you now the map that  
24 was in plan -- in place for senate districts prior to  
25 when the Enacted Plan that the Legislature passed was

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1     adopted.

2                   Have you seen this before? And we can scroll  
3     in on any parts of it if you'd like.

4           A.     I have looked at a -- not this exact document,  
5     but I've looked at the Florida State Senate map that was  
6     in place from 2016 to '22.

7           Q.     And you believe that to be a different map  
8     than this map?

9           A.     Oh, I -- I don't -- I don't know the map well  
10    enough to say yes or no.

11          Q.     I don't want to characterize your review or  
12    not review. It sounds like you've seen the benchmark  
13    map but your analysis didn't involve it that much. Is  
14    that fair to say? Or I'm -- talk to me about how you  
15    either looked at or used or didn't use the benchmark  
16    map.

17          A.     Sorry. You're referring to this -- this map  
18    in front of us as the "benchmark map"?

19          Q.     When I talk about the "benchmark map" -- let's  
20    back up.

21                   If I talk about the "benchmark map," I'm  
22    talking about the map that was in place until 2022.

23                   Do you understand that?

24          A.     Yes.

25          Q.     So whether it was this document or if you

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1 remember another document, please let me know. I'm  
2 trying to understand to what extent you looked at,  
3 analyzed, reviewed, did anything with the benchmark map.

4 A. After drawing the maps that I produced for  
5 this report, I reviewed portions of the benchmark plan  
6 and other historical state senate and state house and  
7 congressional plans to contextualize the changes that I  
8 made in past choice that the Legislature has made in  
9 drawing districts. So to the extent that that review  
10 involved the benchmark plan, I would have looked at  
11 portions of that plan.

12 Q. Okay. That -- and you said "after." Does  
13 that mean you didn't look at the benchmark before you  
14 drew the districts?

15 A. That's correct, to the best of my  
16 recollection.

17 Q. This document that's in front of you right  
18 here -- again, I don't want to characterize what you  
19 said, but I thought you said you weren't sure whether  
20 this is the document you reviewed or if you reviewed  
21 another document. Is that correct?

22 A. I believe I looked at the benchmark plan on  
23 the Legislature's redistricting website, so it would not  
24 have been this exact PDF.

25 Q. Does this PDF look like a true and accurate

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1 representation of the benchmark plan that you looked  
2 at?

3 A. I -- I don't recall enough of the details, the  
4 configuration, the benchmark plan to say yes or no, but  
5 I'm happy to accept your representation that this is  
6 showing us the benchmark plan.

7 Q. Okay.

8 MS. PRICE: Let's mark this as Exhibit 2,  
9 please.

10 (Exhibit 2 will be marked for identification  
11 and attached to the transcript once received by the  
12 reporter.)

13 BY MS. PRICE:

14 Q. And another term that I want to talk to you  
15 about and we used a little bit, but I want to make sure  
16 you understand, is "Enacted Plan." Have you used that  
17 phrase before or are you familiar with that phrase?

18 A. Yes. When you say "Enacted Plan," I  
19 understand that to mean the plan enacted by the  
20 Legislature that is being challenged by the plaintiffs  
21 in this case.

22 Q. Okay. We're going to go ahead and pull that  
23 up.

24 Is that a document or a plan that you reviewed  
25 prior to starting your work?

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1 A. Yes.

2 Q. And what did you review the Enacted Plan  
3 for?

4 A. I was, you know, shown the Enacted Plan in --  
5 you know, as part of my assignment which was to redraw,  
6 you know, the -- you know, according to instructions the  
7 Tampa portion. So I would have -- you know, in altering  
8 this map to draw my map, I would have then, you know,  
9 seen this map and used it as a starting point.

10 Q. Do you recognize this document that's up right  
11 now as the Enacted Plan?

12 A. I recognize the Tampa region.

13 MS. PRICE: Let's go ahead and mark this as  
14 Exhibit 3.

15 (Exhibit 3 will be marked for identification  
16 and attached to the transcript once received by the  
17 reporter.)

18 BY MS. PRICE:

19 Q. Does this look like a true and accurate  
20 representation of the Enacted Plan that you would have  
21 reviewed?

22 A. In the Tampa region that I'm familiar with,  
23 yes; and I'll accept your representation that the rest  
24 of the map is likewise accurate.

25 Q. Okay. Besides the enacted map and prior to

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1 your drawing of Plans A, B, and C, did you review any of  
2 the staff drawn maps that the Florida Senate considered  
3 during the redistricting process?

4 A. No.

5 Q. Did you review any public submissions that the  
6 Florida Senate received --

7 A. No.

8 Q. -- during redistricting process?

9 No.

10 Are you familiar with a public submission  
11 known as "P000S0042" or "Plan 42" which was created by  
12 Nick Warren?

13 A. Not that I know of or I can recall.

14 Q. So you don't remember reviewing that before  
15 you began your work or as a part of your work in this  
16 litigation?

17 A. No.

18 Q. Are there any other maps that you reviewed  
19 during your work on this litigation?

20 A. No.

21 Sorry. Sorry. Could you repeat the question?

22 Q. Yes. I'm wondering whether there's any other  
23 maps that you reviewed as a part of your work in this  
24 litigation?

25 A. Ahh. Yes. As I mentioned I reviewed numerous



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1 historical plans as part of writing my report. I don't  
2 have that list off the top of my head, but I could read  
3 it out of the relevant sections of my report if that  
4 becomes necessary.

5 Q. All right. Anything else?

6 A. No other maps.

7 Q. Were you given any financial constraints with  
8 regard to your analysis in this case?

9 A. Could you be more specific?

10 Q. Were you given any constraints on the amount  
11 of -- financial amount to which you would have built  
12 plans --

13 A. Oh.

14 Q. -- for your work in this litigation?

15 A. Probably. There's usually a clause like that  
16 in the retainer. I don't remember the details for this  
17 particular matter.

18 Q. What about time constraints?

19 A. Only insofar as that would be implied by a  
20 financial constraint.

21 Q. All right. How much time do you -- how much  
22 time did you spend on your analysis and the preparation  
23 of this expert report --

24 A. I don't --

25 Q. -- approximately?

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1 A. I don't recall.

2 Q. Is it a couple of days?

3 A. The work was spaced out over a long period of  
4 time and then concluded a while ago when the report was  
5 filed; so, yeah, I couldn't say exactly.

6 Q. Cumulatively would it be closer to a couple of  
7 days or a couple of weeks?

8 A. Days, probably.

9 Q. Okay. Dr. McCartan, what did you do to  
10 prepare for today's deposition?

11 A. I met with counsel and we discussed sort of  
12 what to expect.

13 Q. Did you review any documents?

14 A. We reviewed my report.

15 Q. Any other documents?

16 A. Not that I recall.

17 Q. And how long did you meet to prepare with  
18 counsel for this deposition?

19 A. About 45 minutes or an hour if I remember  
20 correctly.

21 Q. And it was just one meeting. Is that  
22 correct?

23 A. Yes.

24 Q. I am going to pull up a document titled  
25 "Expert Report of Cory McCartan, Ph.D." And I know it

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1 is lengthy, but we're going to just scroll through the  
2 first 21 pages slowly. I will assure you the rest of  
3 the exhibits are there, but I'd like you to just look at  
4 it as we scroll through it and let me know if you  
5 believe that is a true and accurate copy of your expert  
6 report.

7 I think your signature is on Page 21.

8 A. It appears to be.

9 MS. PRICE: Go ahead and mark this as 4? Is  
10 that correct?

11 THE COURT REPORTER: (Moves head up and down.)

12 (Exhibit 4 will be marked for identification  
13 and attached to the transcript once received by the  
14 reporter.)

15 BY MS. PRICE:

16 Q. And, Dr. McCartan, you said you were contacted  
17 probably late 2023 about this project. When did you  
18 actually begin working on doing the analysis for the  
19 parts of your expert report?

20 A. I don't remember exactly. Early spring 2024  
21 probably.

22 Q. Okay. And I know that we talked about some of  
23 the maps that you would have reviewed that at least you  
24 looked at the enacted map prior to doing your work.

25 Did you also take a look at the complaint as a

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1 part of your analysis and expert report?

2 A. Not that I recall.

3 Q. Is there any document that plaintiffs' counsel  
4 provided to you?

5 A. I was provided with written instructions which  
6 if I remember included a memo from the State Senate  
7 about criteria to use in drawing districts.

8 After drawing the maps I was also provided  
9 with a list of past districts which were represented to  
10 me as being protected that I should analyze as part of  
11 contextualizing the choices made in the plans that I  
12 drew.

13 Q. All right. So you were provided with a memo.  
14 You were provided with past districts to analyze, and  
15 you said that you were provided with a set of written  
16 instructions?

17 A. That's correct.

18 Q. Do you still have those written  
19 instructions?

20 A. Yes.

21 Q. Is that something you are willing to provide  
22 us today by the end of the day?

23 A. I mean, I -- both counsel and I have those and  
24 I'm sure they can be provided.

25 MS. PRICE: Counsel, is that agreeable?

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1 MR. WARREN: To the extent that Dr. McCartan  
2 was provided facts or data that he considered in  
3 forming his opinions or assumptions that he relied  
4 on, certainly he can testify to any of those. I  
5 think otherwise any communications between counsel  
6 and him about his report would be protected under  
7 26(b)4(C).

8 MS. PRICE: I'm not looking for any privileged  
9 communications. What I'm looking for are  
10 instructions that he said he followed and relied  
11 upon in conducting his analysis in his report.

12 MR. WARREN: He --

13 MS. PRICE: He talked about some of those  
14 instructions in his report. So that's just what I  
15 would like to see is just the instructions that he  
16 relied upon.

17 MR. WARREN: I think this same line of  
18 questioning happened in Dr. Trende's deposition,  
19 and Mr. Raban I think gave the same answer that I'm  
20 going to give now, which is that you can definitely  
21 ask him about what he was asked to do that he talks  
22 about in his report and facts and data and  
23 assumptions that he considered and relied on; but  
24 other communications between counsel and expert are  
25 protected.

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1 MS. PRICE: Okay.

2 BY MS. PRICE:

3 Q. Dr. McCartan, since finalizing and submitting  
4 your report have you had an opportunity to review it?

5 A. Yes.

6 Q. You're satisfied with the analysis and the  
7 opinions inside?

8 A. Yes.

9 Q. How many maps did you create or draw as a part  
10 of this litigation?

11 A. Three.

12 Q. Did you create any maps that were not included  
13 within your expert report?

14 A. The three maps that I provided were drawn  
15 interally, so there were drafts that I had revised. So  
16 any draft maps were not included.

17 Q. Does that mean you had draft maps that you  
18 showed to other individuals and then made changes to it  
19 after that?

20 A. That's correct.

21 Q. And who would those individuals have been?

22 A. Counsel for the plaintiffs.

23 Q. Besides counsel for plaintiffs did anyone else  
24 review your maps?

25 A. Well, I don't always know who's a lawyer and

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1 who's not a lawyer, you know, on these calls. So it's  
2 possible there were staff for counsel for the plaintiffs  
3 or assistants; but outside of, you know, ACLU of  
4 Florida, no.

5 Q. So did you have like a research assistant or  
6 anyone help you drawing the maps or creating the maps?

7 A. No.

8 Q. What about in helping you draft or create your  
9 expert report?

10 A. No.

11 Q. On Page 2 of your report --

12 MS. PRICE: Let's scroll to Page 2, if that's  
13 okay, Kassie.

14 BY MS. PRICE:

15 Q. -- you discuss a simulation algorithm -- it's  
16 called an "SMC algorithm" -- that generates many  
17 randomly sampled redistricting plans. Is that right?

18 A. Yes.

19 Q. Is that something that you -- well, first off,  
20 can you talk to me about what an SMC algorithm is, just  
21 generally?

22 A. "SMC" stands for "Sequential Monte Carlo."  
23 It's a general statistical technique that is used to  
24 allow algorithms that can generate random samples. I  
25 developed a particular type of SMC algorithm for the

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1 redistricting context in the paper that's footnoted  
2 there.

3 Q. So you -- do you put like certain inputs  
4 around what you're looking for and then it generates  
5 maps pursuant to those inputs, or do you just show the  
6 geographical area and it generates random maps or how --  
7 can you, I'm sorry, dumb-it-down for me like I'm a third  
8 grader?

9 A. That's roughly correct. So you provide the  
10 relevant geographic data, particular constraints that it  
11 supports that need to be met, it will generate randomly  
12 and according to specific probability distribution plans  
13 from that region, from that part of the state.

14 Q. Okay. Is that -- did you use that algorithm  
15 in this litigation?

16 A. I did not.

17 Q. You did not. Okay.

18 Let's go to ...

19 MS. PRICE: Can you pull up the redrawing area  
20 of the Enacted Plan? It's a separate exhibit.

21 BY MS. PRICE:

22 Q. On Page 5 of your report you have a Figure 1,  
23 and it's called "Redrawn area of the enacted plan." I'm  
24 going to show you just a zoomed-in picture of it.

25 Does that look like a true and accurate



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1 representation of Figure 1 to you?

2 A. Yes.

3 MS. PRICE: Let's go ahead and mark this as --  
4 I think we're on 5?

5 THE COURT REPORTER: (Moves head up and down.)

6 (Exhibit 5 will be marked for identification  
7 and attached to the transcript once received by the  
8 reporter.)

9 BY MS. PRICE:

10 Q. How is this Figure 1, "redrawn area of the  
11 enacted plan," different from the Enacted Plan that we  
12 saw before which I think we marked as Exhibit 3?

13 A. This map represents the same plan. It's just  
14 zoomed in to the Tampa area.

15 Q. But it says "redrawn." So is it -- how is it  
16 different?

17 A. As I said, this map is the same as the Enacted  
18 Plan. It's just zoomed in to the Tampa area.

19 Q. Why did you redraw this map instead of using a  
20 map off the Florida Legislature's website?

21 A. I'm not sure I understand the question. Could  
22 you rephrase it?

23 Q. Figure 1, did you get this figure from the  
24 Florida Legislature's website?

25 A. No.

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1 Q. Did you draw this figure?

2 A. Yes.

3 Q. Why did you draw a figure that you could have  
4 gotten from the Florida Legislature's website?

5 A. I was producing a number of maps to include in  
6 this report, such as Figures 2 and 3 and 4, and so I  
7 also produced Figure 1 using the same type of map so  
8 they were comparable.

9 Q. Comparable but not identical?

10 A. I'm not sure I understand. Is there a  
11 question there?

12 Q. Yes. I'm asking if this is identical to the  
13 map that you would have seen off the Florida  
14 Legislature's website?

15 A. As I said, this is the same as the Enacted  
16 Plan, it's just zoomed in to the Tampa area.

17 Q. So is that a "yes, it's identical," or is that  
18 a "no"?

19 A. I'm just -- you've asked the same question.  
20 I'm giving you the same answer.

21 Q. I'm looking for a "yes" or a "no" answer,  
22 Doctor. It's a yes-or-no question.

23 A. So what do you mean by "identical"?

24 Q. "Identical" means "exactly the same." Is it  
25 exactly the same as the figure that you would have

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1 gotten off the Florida Legislature's website?

2 A. No, because the Florida Legislature website  
3 does not have a zoomed-in version of the Enacted Plan  
4 with these colors and these labels of the Enacted Plan.  
5 So it's not identical.

6 Q. Did plaintiffs' counsel ask you to redraw the  
7 Enacted Plan?

8 A. Those are my instructions in this case, yes.

9 Q. On Page 3, going back to your expert report,  
10 Paragraph 8, it says you "performed initial adjustments  
11 and district drawing using Dave's Redistricting App  
12 software." Do you see that?

13 A. Yes.

14 Q. Can you just kind of talk me through what that  
15 means, "initial adjustments and district drawing"?

16 A. I drafted maps in the DRA software.

17 Q. Okay. But you're using -- okay.

18 So did you start with a blank slate or is  
19 there any significance to the word "initial  
20 adjustments"?

21 A. I see. I began with the Enacted Plan.

22 Q. Okay. Okay. And then you made -- tell me if  
23 I'm wrong or not. You made adjustments to the Enacted  
24 Plan using this software.

25 A. That's correct.

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1 Q. Is that correct?

2 Okay. And then in the second sentence it says  
3 you performed additional adjustments using the  
4 Legislature's online redistricting software. Is that  
5 correct?

6 A. Yes.

7 Q. So can you talk to me about what you did  
8 during the initial adjustments and what you did during  
9 the additional adjustments and why that required the use  
10 of two different softwares?

11 MS. PRICE: Objection; form.

12 A. The first question --

13 BY MS. PRICE:

14 Q. We'll start with the first question.

15 Can you talk to me about the difference  
16 between your initial adjustments and your additional  
17 adjustments?

18 A. Sure. The majority of the drafting occurred  
19 in DRA. After completing that drafting I loaded the  
20 maps into Legislature's software to make sure that there  
21 was no -- there were no inaccuracies, as it were, in the  
22 DRA software and that the final map would satisfy all  
23 the, you know, population bounds and so on per the  
24 Legislature's own software.

25 At that point there were several other maybe

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1 block-by-block adjustments that were made to regularize  
2 boundaries or adjust water blocks and so on. And so any  
3 sort of final small block little tweaks would have been  
4 applied, you know, while in the Legislature software  
5 after they had already been loaded into the software.

6 Q. Okay. So it's a difference in size of the  
7 adjustments?

8 A. It was just -- it was just sequential. I did  
9 most of the drafting and then I got it ready in the  
10 software. And then any other changes that I made after  
11 I initially loaded things into the website or software  
12 happened in that software and those were -- what I  
13 recall those were exclusively very small block-level  
14 adjustments.

15 Q. We previously touched on -- you said you were  
16 given instructions by plaintiffs' counsel. Can you talk  
17 to me about the instructions that plaintiffs' counsel  
18 gave you?

19 A. Yes. Do you have a more specific question?

20 Q. What instructions did plaintiffs' counsel give  
21 you?

22 A. I was instructed to adjust the map to ensure  
23 that District 16 was wholly contained in Hillsborough  
24 County; and then make, you know, any necessary changes  
25 to the surrounding districts to accomplish that and end

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1 up with a plan that still complied with all of the  
2 relevant state and federal and constitutional criteria.

3 Q. Any other instructions?

4 A. I think I was asked to produce three such  
5 plans.

6 Q. Okay. What else?

7 A. Those are the only instructions that I  
8 remember receiving.

9 Q. Can you tell me who gave you those  
10 instructions?

11 A. Counsel for the plaintiffs.

12 Q. And if we go to Page 4, Paragraph 12, I think  
13 this is what you're talking about. You were instructed  
14 to adjust District 16 to be wholly within Hillsborough  
15 County. Correct?

16 A. Yes.

17 Q. And then it says here "while altering  
18 surrounding districts only to the extent necessary to  
19 accomplish this change."

20 A. Yes.

21 Q. What does that mean?

22 A. Well, for instance, redrawing districts  
23 around, you know, Jacksonville wouldn't generally be  
24 necessary because you could just make changes to  
25 districts immediately in the Tampa area.

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1           So once you've redrawn District 16 to be  
2   within Hillsborough there's now a gap on the other side  
3   of the bay that needs to be filled. So some of the  
4   changes are going to have to be made. I was instructed  
5   to keep those changes as minimal as possible while still  
6   complying with the redistricting standards.

7           Q.    So the "surrounding districts," what do you  
8   understand that term to mean? How broad?

9           A.    Both districts that immediately adjoin  
10   District 16 and those that due to changes in the  
11   adjoining districts would also be impacted. So there  
12   might be some districts that don't immediately adjoin  
13   District 16 that would count as surrounding due to the  
14   way they're configured in the locations of county  
15   boundaries.

16          Q.    And who made the decision as to whether it was  
17   necessary to alter a surrounding district? Is that you  
18   or plaintiffs' counsel or both?

19          A.    Me.

20          Q.    Do you know why plaintiffs' counsel asked you  
21   to draw District 16 wholly within Hillsborough County?

22          A.    Not exactly.

23          Q.    What do you mean by "not exactly"?

24          A.    I'm not sure exactly what their reasons are  
25   for that instruction.

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1 Q. Okay. You can't say one way or the other. Is  
2 that fair?

3 A. I understand that keeping districts wholly  
4 contained within counties where possible is part of the  
5 constitutional standards for redistricting. So I could  
6 surmise that the instructions have something to do with  
7 that requirement, but I'm not privy to their larger case  
8 strategy as it were.

9 Q. Were you instructed to make any other  
10 districts fit wholly within the county?

11 A. No.

12 Q. And you said that you were provided with  
13 memorandum here from Senator Rodrigues to Jay Ferrin.  
14 Let's take a look at a Rodrigues memo dated October 18,  
15 2021.

16 Doctor, I'd like you to take a look at this  
17 and let us know if this looks like a true and accurate  
18 copy of the memorandum that you were given and reviewed  
19 and followed as a part of your work.

20 A. Yeah, that appears to be the same memo.

21 MS. PRICE: Great.

22 Let's mark this as 6, please.

23 (Exhibit 6 will be marked for identification  
24 and attached to the transcript once received by the  
25 reporter.)



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1 BY MS. PRICE:

2 Q. And are there any other instructions that you  
3 remember as we're talking through all this now that you  
4 were also given to follow as a part of your work?

5 A. No, not that I recall.

6 Q. Let's go ahead and go plan by plan, if that's  
7 okay. I'm going to pull up an enlarged copy of Plan A  
8 which is Figure 2 from your expert report.

9 I'd like you to take a look at it,  
10 Dr. McCartan, to make sure this is a true and accurate  
11 copy of Plan A.

12 A. Yes, it looks to be.

13 Q. Great. Thank you.

14 MS. PRICE: Let's go ahead and mark this as  
15 Exhibit 7.

16 (Exhibit 7 will be marked for identification  
17 and attached to the transcript once received by the  
18 reporter.)

19 BY MS. PRICE:

20 Q. And, Doctor, in your own words can you  
21 describe to me how you drew Plan A?

22 A. Sure.

23 So I began by removing the portion of District  
24 16 contained in St. Petersburg. So I removed all those  
25 blocks.

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1           That required then sort of bringing the  
2     boundary of District 18 down so that it would contain  
3     the rest of the peninsula there, which then in turn  
4     required that District 21 be adjusted to take in --  
5     taking of the population there.

6           At that point District 21 adjoins, you know,  
7     both District 14 and District 23 in the enacted map, but  
8     its boundary with District 14 is completely along the  
9     county border. And so to avoid introducing, you know,  
10    additional county splitage, it wasn't necessary for me  
11    to adjust the District 21/14 border.

12           So instead I adjusted the border of District  
13    23, and then that then created a need to adjust the  
14    boundaries of District 16 in the northeast as well as  
15    District 20 to keep populations balanced.

16           In all those changes I attempted to comply  
17    with all the two tiers of the redistricting  
18    requirements.

19           Q.    Okay. Any -- I'm sorry. I thought you got  
20    through 23. Did you get down to 20 or ...

21           A.    Yeah. So the adjustment of 23 then required  
22    adjustments to 20 and 16 to fill in the map and keep  
23    populations balanced.

24           Q.    All right. So you said you started by moving  
25    the Pinellas population of enacted 16 into 18. Right?

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1 A. Yeah, that's one way to put it.

2 Q. Okay. And then you said you moved the excess  
3 from 18 into 21?

4 A. Yes.

5 Q. Okay. Why did you do that instead of moving  
6 it into 14 or 20?

7 MS. PRICE: Object to form.

8 BY MS. PRICE:

9 Q. Why did you choose to put the excess  
10 population from 18 into 20?

11 A. Well, as I said, you know, avoiding splitting  
12 counties is one of the tiers of the redistricting -- one  
13 of the redistricting criteria. So adjusting the 21/18  
14 boundary can require introducing additional county  
15 splits and was a more minimal change compared to  
16 somehow, you know, having 20 stretch across into the new  
17 county or having 14 also cross the bay.

18 Q. Okay. You previously used the word  
19 "required." Did you understand that to mean you could  
20 not draw a map with those options?

21 A. I'm sorry. I don't -- I don't recall the  
22 context in which I said "required."

23 MS. PRICE: Madam Court Reporter, can you read  
24 back Dr. McCartan's answer when he talked about --  
25 I first asked him to describe how he drew Plan A,

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1 and he said that he moved population into 18, and  
2 then I think he said he was required to then move  
3 it to 21 and then that required to move it  
4 somewhere else. Can you read that, please?

5 THE COURT REPORTER: Yes, ma'am.

6 (Reporter read back as requested.)

7 BY MS. PRICE:

8 Q. So, Dr. McCartan, can you explain why you used  
9 the word "required" twice there?

10 A. Yeah. So I guess I should, yeah. So  
11 "required" in the sense of the only district adjoin --  
12 yeah, that -- so once you unassign the blocks in  
13 Pinellas that were part of District 16 then you said,  
14 "Okay, where do those blocks get assigned?" The only  
15 option that doesn't introduce a new county split is to  
16 assign those blocks to District 18.

17 So my understanding of compliance with  
18 constitutional standards would be that 18 -- putting  
19 those blocks in 18 would be the appropriate choice. So  
20 I did not receive, you know, instruction to do that  
21 per se.

22 Q. And is the same true for 21?

23 A. Yes.

24 Q. Okay. Let's talk about the boundaries between  
25 16 and 23.

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1 MS. PRICE: And can we enlarge those a little  
2 bit just so we can see the difference between the  
3 blue and the yellow?

4 BY MS. PRICE:

5 Q. Can you talk to me how you drew those  
6 boundaries between 16 and 23?

7 A. Yeah. I intended to, you know, ensure that  
8 municipalities -- incorporated municipalities -- weren't  
9 split and major roadways, waterways, canals and the like  
10 were followed. The irregular shape of some of the  
11 census blocks in that part of the county led to, you  
12 know, some abnormalities in the geographic shape of the  
13 border.

14 But the adjustments there were, you know, as  
15 elsewhere, to meet the population targets for each  
16 district while, you know, complying with those  
17 constitutional standards.

18 Q. It looks like there's an east-west road that's  
19 pretty straight across going down -- just south of the  
20 north border of 16. Why didn't you follow that road for  
21 more clear boundary and make adjustments to 14 and 23  
22 and 16 there?

23 A. Well, as I mentioned, adjusting District 14  
24 was not necessary to make adjustment to 16 that I was  
25 instructed to do. My instructions were only to make

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1 necessary changes. So any adjustment to 14 would not  
2 have been in line with my instructions.

3 Q. Did you --

4 A. As to why -- oh.

5 Q. Go ahead. I'm sorry.

6 A. As to why that particular road, I couldn't  
7 speculate. I made -- I drew these maps a while ago and  
8 all the decisions sort of play off each other so you  
9 can't really isolate one decision from another.

10 Q. You're not able to look at these maps today  
11 and tell me whether you were following roads or cities  
12 for portions of them? Is that what you're saying?

13 A. I don't believe that's what I just said.

14 Q. Can you restate what you're saying then so  
15 that I can better understand.

16 A. Sure.

17 Because of the need to keep every district  
18 within a cer -- narrow population band, changes to one  
19 portion of a boundary unnecessarily create changes on  
20 other boundaries. So any one decision about a portion  
21 of a map implicates decisions elsewhere.

22 So I can't look at any one portion of the  
23 boundary and justify that particular choice of boundary  
24 only with regards to that boundary. It may also have  
25 depended on what was happening elsewhere in the map as I

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1 was drawing it.

2 Q. Okay. Can you tell me right now whether the  
3 north side of 16 follows a road or any particular  
4 cities?

5 A. Just based on this map we have in front of us  
6 there's not enough detail for me to answer that  
7 question.

8 Q. And you don't remember this as a part of your  
9 work sitting here today?

10 A. No.

11 Q. Okay. You said that it wasn't necessary to  
12 adjust District 14 and so you didn't. Is that  
13 correct?

14 A. That's right.

15 Q. Did you understand the instruction that you  
16 could only change districts if it was necessary to mean  
17 that you couldn't adjust District 14?

18 A. As I mentioned my instruction was to adjust  
19 surrounding districts only to the extent necessary to  
20 accomplish, you know, keeping 16 within Hillsborough.  
21 So if a change -- it was possible to leave a district  
22 unchanged, then yeah, my interpretation of that  
23 instruction would be that I was required not to change  
24 it.

25 As I mentioned due to the configuration of 14

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1 against the northwest corner of Hillsborough it was not  
2 necessary to alter 14 to make the changes to District 16  
3 that I was instructed to.

4 Q. So then I think what I'm hearing you say it's  
5 based on the northwest corner of 14 and your  
6 instructions from plaintiffs' counsel you were not able  
7 to make changes to District 14. Is that correct?

8 A. Yes.

9 Q. Okay. Let's talk about -- so for -- I think  
10 it says in Paragraph 17 of your report -- and I don't  
11 want to switch over to it, but I think you have a copy  
12 of it in front of you. Is that correct, Doctor?

13 A. I do.

14 Q. It says that 23 had too much population and so  
15 you adjusted both 16 and 20 to balance it out.

16 Why didn't you just take that excess  
17 population and put it into 16 and leave 20 alone?

18 A. Sorry. I'm just reading that section of the  
19 report.

20 Q. That's okay.

21 A. So in removing the portion of 16 in Pinellas  
22 now 16 was underpopulated, so it had to gain from  
23 somewhere. It could gain partially from 23, but in, you  
24 know, complying with the standards as I interpreted  
25 them, it made more sense to end up adjusting both 16 and



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1 20. And that makes sense especially considering the  
2 original adjustment of 16 was down in the southern  
3 portion of the district which is right about where it  
4 interfaces with District 20.

5 Q. So what requirements made you take population  
6 and change population from 20? I'm trying to understand  
7 why it wouldn't have just been solved by expanding 16 to  
8 take the overflow from 23.

9 A. Yeah. So part of it is that you have  
10 incorporated municipality over around Plant City, so you  
11 try to avoid splitting that. So it a little bit boxes  
12 you in as sort of where you can take population up in  
13 that corner, whereas there are not really many  
14 incorporated municipalities down in the southern portion  
15 of the county.

16 Additionally, you know, one of the  
17 requirements in the memo is to, you know, make sure that  
18 you're not diluting the voting power of minority voters.  
19 And so to the extent that you start to include portions  
20 of the county that would have that effect, I try to  
21 avoid doing that.

22 And so putting those things together, making  
23 adjustments to both 16 and 20, to me in my judgment that  
24 complied with those standards more closely.

25 Q. Are there any other incorporated areas of 23

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1 besides Plant City that you were concerned about  
2 avoiding in Hillsborough County?

3 A. There may have been. That's the one that, you  
4 know, comes to mind right now that I recall. I don't  
5 have -- I don't memorize all of the incorporated ones.  
6 That's the one that comes to mind.

7 Q. I grew up in Dade City, so I'm a little bit  
8 familiar with this area. So I'm just wondering, you  
9 know, if there's something in that northeastern part of  
10 Hillsborough County that you were trying to avoid  
11 putting into 16?

12 A. Nothing specific comes to mind.

13 Q. Okay. So it would have been either -- I think  
14 what I hear you saying, let me know if this is a fair  
15 representation -- it would have been either avoiding  
16 splitting incorporated cities or municipalities, or else  
17 making sure that you didn't diminish the voting power of  
18 other races, minority races. Is that correct?

19 A. That's right.

20 Q. Okay. Let's talk about -- if we could scroll  
21 down a little bit -- the boundaries of 16 and 20.

22 Can you talk to me a little bit about how you  
23 decided to make these boundaries, the entire boundary  
24 line between 16 and 20? What was driving your  
25 decisions?

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1           A.     Sure.

2                     So at a high level in line with, you know,  
3 requirements to not dilute minority voting power, you  
4 know, I was aware of sort of the broad demographic  
5 trends in southern Hillsborough.

6                     And then looking specifically at other aspects  
7 of those criteria, you have some major roadways,  
8 north-south roadways, that are sort of paralleling the  
9 shore there. So it made sense to build a district  
10 boundary around those roadways or in some cases  
11 waterways. So I ended up with that configuration in  
12 this particular map sort of balancing those two  
13 considerations.

14           Q.     Let's take this piece by piece.

15                     I heard you say that you were making  
16 considerations based on the demographics of southern  
17 Hillsborough County. Is that correct?

18           A.     Yes.

19           Q.     Can you talk to me a little bit more about  
20 what that means?

21           A.     I had through the Legislature software, for  
22 instance, had access to, you know, the demographics of  
23 this area. And, you know, mathematically if you add --  
24 for instance, if you have a district that's -- has a  
25 high minority percentage and you add an area that has a

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1 low minority percentage that's going to reduce the  
2 overall minority percentage of the district.

3 And so -- and sort of laying out the overall  
4 configuration of 16, I was trying to balance keeping 16  
5 as similar as possible to the existing plan while on the  
6 margin while changing things, avoiding, for instance,  
7 removing portions of District 16 that, you know, had,  
8 you know -- you know, heavily black areas, for instance.

9 Q. Okay. So you had to take race into account  
10 when you were drawing these lines, particularly with  
11 regard to southern Hillsborough County?

12 A. I don't know about "particularly." In order  
13 to comply with the redistricting standards and to avoid  
14 diluting, you know, or diminishing voters' ability to  
15 elect their representatives -- minority voters' ability  
16 to elect representatives -- I had to be aware of the  
17 racial composition of different parts of the county.

18 Q. Okay. So you made decisions based upon some  
19 of that demographic information?

20 A. The overall sort of strategy or configuration  
21 aware at a high level changes were made was informed by  
22 that, yes.

23 Q. And I heard you -- let's just talk about that  
24 coast part from like Gibsonton down to Ruskin. I heard  
25 you say you were following a roadway. It looks like

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1 you're really close to the coastline. So I think you  
2 were following you said the memo and like Tier 2  
3 considerations.

4 Why wouldn't you just -- why would you carve  
5 that coastline part out of District 16?

6 A. I mean, I do have a map that doesn't do that,  
7 so I provided multiple options.

8 In this particular map I found that roadway to  
9 be a natural boundary. There's a reasonable amount of  
10 population in between that roadway and the coast and so,  
11 you know, included in the coastal area would have  
12 required adjustments elsewhere. So I did produce a  
13 version that tried out that configuration as well.

14 Q. Okay. But in this map you carved that piece  
15 out by following that roadway. Is that correct?

16 A. I guess I'm not sure I would characterize it  
17 as "carved it out." The boundary has to go somewhere.  
18 I found that that roadway was a boundary that led to --  
19 you know, it was a major roadway. It was a, you know,  
20 pretty, pretty straight boundary. It helped me comply  
21 with all the standards.

22 Q. How many municipalities did you split by  
23 following that roadway?

24 A. I'm not sure.

25 Q. More than one?

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1           A.     To the best of my recollection there are no,  
2     you know, incorporated municipalities in that portion of  
3     the county, so I -- I'm not sure the answer would be  
4     yes.

5           Q.     Okay.   So if you split Gibsonton, Apollo  
6     Beach, Ruskin, any other areas down there, you're saying  
7     that's okay because they're not incorporated?

8           A.     That's --

9                   MR. WARREN:   Objection.

10          A.     -- my understanding of the criteria, yes.

11     BY MS. PRICE:

12          Q.     Okay.   And you considered following the road  
13     boundary to be more important than a compactness  
14     requirement in this particular map.   Is that correct?

15          A.     Could you --

16          Q.     I guess if you had to choose between something  
17     that would improve compactness or following the road  
18     boundary, it looks to me like for Plan A you went with  
19     the road boundary?

20          A.     I'm not quite understanding the hypothetical  
21     here.   Is the hypothetical that not following this  
22     particular road boundary would have led to a more  
23     compact map?

24          Q.     Well, you tell me.   Do you think 20 would have  
25     been more compact if you took 16 all the way west to the

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1 coast?

2 A. I'm not sure. You know, compactness is a  
3 visual judgment. It's also -- you know, the portion of  
4 the districts that's in the bay is not sort of shown on  
5 this map, and there's no metrics on compactness you can  
6 use to measure it. I'm not sure exactly what the impact  
7 would have been on some of those metrics, so --

8 Q. So when -- I don't mean to cut you off. I'm  
9 sorry.

10 A. Yeah. Just to conclude, you know, it's  
11 possible that a particular reconfiguration of moving the  
12 boundary to the coast would have made one district or  
13 the other more compact or it might not have. It might  
14 have made one district more compact, the other less  
15 compact.

16 So compactness was, you know, an element that  
17 I considered in drawing these districts, but I'm not  
18 sure it's fair to characterize it as saying I picked one  
19 over the other in drawing Map A.

20 Q. In drawing Map A it -- I'm trying to think of  
21 an accurate way to phrase this that accurately restates  
22 what you're saying.

23 You're saying you looked at compactness, but  
24 sitting here today you can't tell me whether following  
25 that road instead of going to the coast impacts

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1 compactness one way or the other? Is that what you're  
2 saying?

3 A. Well, as I mentioned earlier, whenever you  
4 make a change to one part of a map, you have to make a  
5 change elsewhere on the map to balance population. So I  
6 don't know other than by looking at a comparison with  
7 the version -- yeah, with Plan C which does do something  
8 like this. Other than that, I can't tell you what the  
9 specific impact would have been in compactness because  
10 there would have been changes to both districts in not  
11 just this region but elsewhere.

12 So overall when drawing these districts I  
13 balanced and kept sort of equal as it were, you know,  
14 trying to follow these major boundaries and visual  
15 compactness of the districts.

16 Q. Let's talk about the southeastern boundary  
17 right here between 16 and 20.

18 A. Okay.

19 Q. If you start from the bottom where it says,  
20 "Sun City Center," it looks like you kind of shot over  
21 to the east and then you're jetting over to the west and  
22 then you're going due east again and then you kind of go  
23 north.

24 Can you kind of tell me what was driving those  
25 line-drawing decisions?



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1           A.     Sure.

2                     Some of those follow major roadways, others  
3 follow waterways, others are just boundary portions  
4 trying to connect the pieces that do follow roadways or  
5 waterways.

6           Q.     Did those line-drawn decisions have anything  
7 to do with race?

8           A.     I would -- I need a more specific question.  
9 Like overall, as I mentioned, the configuration of these  
10 districts wasn't formed by racial demographics. I  
11 wouldn't characterize any particular segment of that  
12 boundary as drawn due to race or something like that.

13          Q.     Does that mean that you don't think that you  
14 can look at pieces of a boundary on a district and  
15 characterize those as drawn by race as examples of that?

16                     MR. WARREN: Object to the form.

17          A.     Are you saying as a general principle or for  
18 my map specifically?

19 BY MS. PRICE:

20          Q.     I'm trying to understand what you just said.  
21 It sounded to me like you said as a general principle  
22 you can't look at a specific line of a district and say  
23 whether it was informed by race or not. So I'm trying  
24 to understand if you mean with your maps or with any  
25 map?

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1           A.     Gotcha.

2                     I think it's a much bigger conversation than  
3     general principle. I'm not here to really speculate on  
4     that.

5                     In my map specifically, as I mentioned, race  
6     helped inform the overall configuration of the district.  
7     But any boundary portion, any decision there, had  
8     implications for the rest of the other boundaries, the  
9     rest of the map, the rest of the population constraint.

10                    So I'm not able to look at a particular  
11    portion of a boundary that I drew here and tell you, you  
12    know, this was, you know, this percentage due to race or  
13    what have you. These were sort of holistic decisions  
14    made by trying to balance the requirements within each  
15    tier while avoiding diminishing, you know, black voters'  
16    ability to elect their representatives of choice.

17            Q.     Do you recall if there's any municipal  
18    boundaries that you're following here, or is it just I  
19    think you said roadways?

20            A.     I'll have to check, but I don't think to my  
21    recollection there are incorporated municipalities in  
22    that portion of the county. So those would in all  
23    likelihood not be incorporated municipal boundaries.

24            Q.     The Enacted Plan kind of took 301 down as its  
25    eastern border down with 20.

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1                   Why didn't you follow that road since it's a  
2                   major highway?

3                   MR. WARREN: Object to form.

4                   A. Well, in this case if I had done that there  
5                   would have been not enough population in District 16.  
6                   So adjustments elsewhere would have been had to be made.  
7                   And I think several other of my maps did explore  
8                   configurations where, you know, other roadways or other  
9                   choices were made there.

10                  BY MS. PRICE:

11                  Q. You couldn't have gone a little bit east of  
12                  the 23 and gone over to the coast and gone south more  
13                  and still stayed within Hillsborough?

14                  A. I'm not sure I follow that hypothetical.

15                  Q. If you -- was it possible for you to draw --  
16                  was it possible for you to stay with U.S. 301 in drawing  
17                  16 and still comply with the instructions that you were  
18                  given?

19                  A. So I understand 301 to be the sort of  
20                  right-most marked road on this map, so I'm not familiar  
21                  with all the roadways. So if that is in fact 301, it  
22                  may be possible to draw a map that does that, that stays  
23                  within Hillsborough and that complies with all the  
24                  criteria. In trying to balance these considerations I  
25                  did not produce such a map.

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1 Q. Do you recall why you went east of 301 as  
2 opposed to south or east into 23?

3 A. I just -- I didn't think about that particular  
4 decision as a trade-off in that way you just framed.

5 (Mr. Evans exited the videoconference.)

6 A. I believe I probably had finalized the  
7 boundary up around 16 and 23 or close to it and then the  
8 southern portion, so I wasn't thinking about trading  
9 off, following 301 versus, you know, drawing up there in  
10 23, so ...

11 BY MS. PRICE:

12 Q. Go ahead and go to Plan B now. I'm going to  
13 pull up an enlarged graphic of Plan B from your report  
14 which is Figure 3.

15 Doctor, I'd like you to take a look at this.  
16 Let me know if you believe this to be a true and  
17 accurate copy?

18 A. It looks to be.

19 MS. PRICE: Let's go ahead and mark this as 8.

20 (Exhibit 8 will be marked for identification  
21 and attached to the transcript once received by the  
22 reporter.)

23 BY MS. PRICE:

24 Q. Can you talk to me about how you drew Plan  
25 B?

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1           A.     Sure.

2                     I began with Plan A and made sort of minor  
3 adjustments, including drawing District 23 out to the  
4 gulf coast; making some adjustments to other boundaries  
5 to, you know, look at different configurations that  
6 still respect both compactness and following major, you  
7 know, roadways, waterways, and so on.

8                     I think in general I went from A to B. I  
9 tried to sort of -- not always but, you know, produce  
10 versions that prioritize compactness a little more; or,  
11 you know, when there were two ways to go in Plan A,  
12 maybe Plan B looked at the one that ended up with a more  
13 visually compact result.

14                    So overall the adjustments to Plan A were  
15 relatively minor.

16           Q.     Why did you start with Plan A instead of  
17 starting with the enacted map and drawing a new -- a new  
18 plan?

19           A.     My instructions were to produce three plans.  
20 The overall sort of -- I didn't feel there were that  
21 many choices to make regarding the overall configuration  
22 given the constraints involving county splits, you know,  
23 the things we talked through with Plan A.

24                    And so through the overall configuration that  
25 I found Plan A I felt was sort of what made the most

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1 sense, what was sort of implied by the various  
2 instructions and requirements.

3 So re-deriving that same configuration from  
4 the starting point wasn't necessary. I sort of began  
5 with the configuration that was in Plan A and made  
6 further adjustments in there to produce another  
7 alternative for plaintiffs.

8 Q. Okay. So I think what I hear you saying is  
9 that based on the constraints as you understand them in  
10 the Florida Constitution, as well as the instructions  
11 you were given, I think you said you didn't have that  
12 many choices. Is that correct?

13 A. I'm sorry. Can you repeat that question?

14 Q. Yes. I want to make sure I understand what  
15 you're saying. And I think you said that based on the  
16 constraints and the requirements of the Florida  
17 Constitution, as well as the instructions that you were  
18 given in doing your drawing, I think you said you didn't  
19 have that much choices. Is that correct?

20 A. In terms of the overall configuration of the  
21 districts, yes.

22 Q. Yes. Okay.

23 And you mentioned 23. Here you're taking 23  
24 out to the coast. Can you talk to me about what drove  
25 that decision?

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1           A.     Well, that sort of -- we're going to call it  
2     the western boundary of 23, and Plan A was a little bit  
3     irregular due to the need to avoid splitting  
4     municipalities while trying to still follow major  
5     roadways. And so to produce an alternative with a bit  
6     of a cleaner western boundary, I found that going out to  
7     the coast, then coming in and having sort of a more  
8     vertical north-south boundary down to the county line  
9     was possible in a way that it sort of didn't work out  
10    that way in Plan A.

11           Q.     Let's talk about the adjustment that you made  
12    between 16 and 20.

13                   MS. PRICE: Can you scroll down there a little  
14    bit? Thanks.

15    BY MS. PRICE:

16           Q.     Can you tell me -- just talk me through what  
17    adjustments you made here?

18           A.     Yeah. They were pretty minor overall, so I'm  
19    not going to recall all of them.

20           Q.     Sure.

21           A.     One that does turn up just looking side by  
22    side is sort of straightening out the 16/20 border near  
23    the northern end of District 20. So I made this a  
24    straight north-south line here in this map, whereas  
25    there was a jog on a major east-west road in Plan A.

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1 Q. And then are your boundaries between 16 and  
2 23? Did you adjust much of that or is that mostly the  
3 same?

4 A. There was a adjustment to the northeast corner  
5 to sort of make that a little more square. I mentioned  
6 the sort of irregular census block shapes up in that  
7 area. So I found a configuration here with Plan B that  
8 increased the visual compactness and sort of squared off  
9 that corner.

10 Q. And it looks like you didn't make any changes  
11 to District 14 here either. Is that correct?

12 A. That's correct.

13 Q. Okay. And is it for the same reason as we  
14 discussed for Plan A?

15 A. Yes.

16 Q. Okay. Let's go ahead and go to Plan C now.

17 Dr. McCartan, this is an enlarged  
18 representation of Figure 4 which is Plan C in your  
19 expert report. Does this look like a true and accurate  
20 copy to you of Plan C?

21 A. Yes.

22 Q. Great.

23 MS. PRICE: Let's go ahead and mark this as  
24 Exhibit 9.

25 (Exhibit 9 will be marked for identification



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1 and attached to the transcript once received by the  
2 reporter.)

3 BY MS. PRICE:

4 Q. So can you tell me how you drew Plan C?

5 A. Sure.

6 So I believe most of the changes -- if I  
7 remember correctly most of the changes here involved  
8 sort of the 16 and 23 -- it was mostly 16 and 20 border.

9 So I was working off Plan B and just sort of  
10 made further adjustments to sort of explore the  
11 trade-off, to the extent there was one, between visual  
12 compactness and some of the other, you know, standards.

13 And so I moved the southern portion of the  
14 western boundary of District 16 out to the coast, and  
15 then made sort of adjustments from there to the other  
16 portion of the boundary while trying to sort of still  
17 follow major roadways and waterways and previous compact  
18 districts.

19 Q. So I think I heard you say you started with  
20 Plan B.

21 A. That's right.

22 Q. Is that right?

23 And is that for the same reasons we discussed  
24 before as why you started with Plan A previously for  
25 Plan B?

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1 A. Yes. So the chronological -- I first drew  
2 Plan A, then Plan B and then Plan C. So it made sense  
3 to take the most recent plan at each stage when drawing  
4 the next one.

5 Q. And it looks like the adjustments that you're  
6 making are kind of narrowing off with time. Is that  
7 right? Did you make more adjustments between Plan A and  
8 B than B and C?

9 A. I would say that B to C probably involved a  
10 bigger change, especially in the configuration of 16 and  
11 20. But it's true that fewer districts were adjusted  
12 between Plan B and Plan C.

13 Q. The bigger change is between 16 and 20, and I  
14 don't know if you made any changes -- you can tell me --  
15 with 21, 23, 18 and 14?

16 A. I don't believe I did.

17 Q. Okay. And you just said no changes to  
18 District 14 like in B you had in A. Is that for the  
19 same reasons that we discussed for --

20 A. Yes.

21 Q. -- Plans A and B?

22 Dr. McCartan, did you author a rebuttal report  
23 as a part of this litigation?

24 A. No.

25 Q. Did you review the expert report from Dr. D.

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1 Stephen Voss in this litigation?

2 A. No.

3 Q. Does that mean -- do you plan to have any  
4 opinions at trial regarding any opinions in Dr. Voss's  
5 report?

6 A. I don't -- I don't know anything about this  
7 report, so at this moment I have no plans.

8 Q. You have no plans to review it and do further  
9 analysis. Is that correct?

10 A. That's correct.

11 Q. Did you review an expert report from Dr. Sean  
12 P. Trende in this litigation?

13 A. No.

14 Q. And do you have any plans to review that  
15 report and do any analysis of that?

16 A. No.

17 Q. So is it fair to say that you do not plan to  
18 offer any rebuttal of any of the opinions in  
19 Dr. Trende's report at trial?

20 A. Yes.

21 Q. Let me ask a few more questions. If we go to  
22 Paragraph 28 in your expert report, which is Page 10, to  
23 Exhibit 4.

24 And it looks like here you had done in the  
25 paragraphs before compactness analysis. Is that

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1 correct?

2 A. Yes.

3 Q. And your conclusion in 28 is that across the  
4 three compactness measures the three plans, A, B, and C,  
5 have comparable scores to the Enacted Plan. Is that  
6 correct?

7 A. Yes.

8 Q. And then Paragraphs 29 through 33 it looks  
9 like you talk about boundary analysis scores?

10 A. That's correct.

11 Q. And at the bottom of Page 10, top of Page 11  
12 in Paragraph 29 it says, you know, "The legislative  
13 software produces boundary analysis scores ...

14 "These scores do not measure how much these  
15 component major boundaries are respected or utilized;  
16 rather, they measure only what percentage of a  
17 district's boundary tracks the categories of boundaries  
18 incorporated into the software."

19 Do you see that?

20 A. I do.

21 Q. Can you help me understand in just a very  
22 elementary school level what that means; what it doesn't  
23 include, what it does analyze?

24 A. Sure.

25 So anytime we write redistricting

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1 requirements, those are written in English; and anytime  
2 we try to measure those aspects of a particular plan or  
3 district, that happens in math and computer code. So  
4 some translation needs to happen and there are  
5 reasonable judgments and decisions can be made about how  
6 to best do that.

7 So Legislature software has intended to  
8 translate the requirement of respecting, you know,  
9 municipal boundaries, waterways, roadways, et cetera, in  
10 terms of this particular measurement. But a particular  
11 score on this -- you know, these boundary scores don't  
12 in and of themselves establish or disestablish  
13 compliance with that particular constitutional standard.

14 Q. Okay. What -- I'm trying to understand what  
15 the sentence means. It does "not measure how much these  
16 component major boundaries are respected or utilized;"  
17 it only measures what percentage of a district's  
18 boundary tracks the categories of boundaries in the  
19 software.

20 So does that mean it's not telling you whether  
21 you move away from a boundary? I guess I'm trying to  
22 under -- do you know what I mean? Like I'm trying to  
23 understand what this metric is used for.

24 A. So the first part of that sentence refers to  
25 the fact that the scores don't tell you whether or not

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1 you have respected those boundaries in the sense of the  
2 constitutional standards.

3 The second part of that sentence says that  
4 what they do tell you is numerically what percentage of  
5 the boundary, you know, follows -- you know, aligns with  
6 these various types of, you know, natural and political  
7 boundaries.

8 Q. And it looks like your analysis covers  
9 Districts 16 and 18.

10 Did you do an analysis for Districts 21, 23,  
11 20, and 14?

12 A. All those scores were produced as part of the  
13 legislative software's report, and I believe those are  
14 appended to my report. But given that the district I  
15 was redrawing was District 16 and that immediately  
16 impacted, you know, the region drawn by District 18, I  
17 focused on those two districts in the report write-up  
18 here.

19 Q. Okay. But you changed boundaries -- right? --  
20 for 21, 23 and 20. Right?

21 A. That's right.

22 Q. But you didn't do -- is it true, did you do a  
23 boundary analysis for four of those three districts, 21,  
24 23, and 20, or no?

25 A. I did. They're in the appendix to my report.

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1 Q. It's in your appendix but it's not in your  
2 narrative. Is that correct?

3 A. That's correct.

4 Q. Okay. Do you recall sitting here today,  
5 without going into your appendix, how those three  
6 districts faired with the boundary scores?

7 A. I do not.

8 Q. Okay. If I use the term "geopolitical  
9 boundaries" to refer to cities, municipalities or county  
10 boundaries, will you understand what I mean?

11 A. Yes.

12 Q. Have you done any analysis of the percentage  
13 of which your Plans A, B, and C deviate from  
14 geopolitical boundaries?

15 A. To the extent measured by the boundary scores  
16 which are in my appendix and discussed in the report,  
17 yes.

18 Q. But I thought this said this doesn't talk  
19 about whether you complied on deviation. It just talks  
20 about -- I guess this is where I'm getting confused.

21 A. Maybe I'm confused. I maybe misheard or  
22 misunderstood what you meant by "deviate" in your  
23 question. So the percentage of the boundaries in each  
24 district that align with geopolitical boundaries is  
25 measured by the --

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1 Q. Uh-huh.

2 A. -- (inaudible) score, and that's included in  
3 my report.

4 Q. In the narrative?

5 THE COURT REPORTER: I'm sorry. I couldn't  
6 hear that part. "Is measured by" what "score"?

7 THE WITNESS: It's measured by the boundary  
8 scores --

9 THE COURT REPORTER: Thank you.

10 THE WITNESS: -- included in my report.

11 BY MS. PRICE:

12 Q. Okay. Is that in the appendix or is that this  
13 narrative that we're talking about between 29 and 33.

14 A. Both.

15 Q. Do you have an opinion as to whether Plans A,  
16 B, and C score better for geopolitical boundaries than  
17 the Enacted Plan?

18 A. On average across districts? In a particular  
19 district? I guess I would need a more specific  
20 question.

21 Q. Well, let's look at it holistically. If you  
22 looked at all of Plan A with regard to deviations from  
23 geopolitical boundaries, do you think Plan A would have  
24 more deviations or do you think the Enacted Plan would  
25 have more deviations based on your analysis, or did you



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1 not do an analysis on that?

2 A. I would have to consult the numbers in my  
3 appendix.

4 Q. Okay. You can't tell me that today?

5 A. Correct.

6 Q. Is that something that you're planning on  
7 reviewing and giving an opinion on at trial?

8 A. Haven't discussed trial preparation at this  
9 point. I have no specific plans to do so.

10 Q. You can't tell me that you're not going to  
11 testify about that at trial. Is that correct?

12 A. I plan to testify truthfully to any questions  
13 I'm asked at trial. I don't know what those questions  
14 will be.

15 Q. Is the same true for Plans B and C? You can't  
16 tell me sitting here today whether Plans B or C would  
17 fair better on an analysis of deviation from boundaries  
18 than the Enacted Plan?

19 A. Not without consulting my appendix, that's  
20 right.

21 MS. PRICE: Let's take a five-minute break, if  
22 that's okay? I may be close to done.

23 THE COURT REPORTER: I'm off the record.

24 (Recess from 4:09 p.m. to 4:15 p.m.)

25 BY MS. PRICE:

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1 Q. Thank you, Dr. McCartan. I have just a few  
2 more questions, if that's okay. You know, bear with me  
3 and you will get out of here before 4:30, I hope.

4 Okay. In your report on Page 12 you have --

5 MS. PRICE: Go ahead and pull that up, if you  
6 don't mind, Kassie.

7 BY MS. PRICE:

8 Q. You have a section on "Comparison with Other  
9 Protected Legislative Districts"?

10 A. That's right.

11 Q. Okay. And it says here you were -- and I  
12 think you mentioned this previously in the deposition --  
13 that you were "provided by counsel for the Plaintiffs  
14 with a list of districts that were designated by the  
15 Legislature as protected under the Tier One minority  
16 group standards." Is that right?

17 A. That's correct.

18 Q. Okay. And then in Footnote 4 you state that  
19 "To avoid a conflict, this list excluded certain  
20 districts in South Florida that I've been retained to  
21 study in other potential litigation."

22 Is that the litigation that we talked about,  
23 the congressional state house district that we talked  
24 about earlier in this deposition, or is there different  
25 litigation?

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1 A. It is that litigation, yes.

2 Q. Okay. Can you tell me what those districts  
3 were that were -- did you exclude the districts, or did  
4 plaintiffs' counsel exclude the districts?

5 A. Plaintiffs' counsel did.

6 Q. Okay. So do you know what districts were  
7 excluded from the list that you were given?

8 A. No, not exactly. And of the ones that I'm  
9 studying in the other litigation I actually don't know  
10 which are protected and which aren't.

11 Q. You have talked a good bit about some of the  
12 constitutional requirements that you followed today.  
13 Correct?

14 A. Yes.

15 Q. And I think you referred to them as Tier 1 and  
16 Tier 2?

17 A. I'm not sure I have, but I'm familiar with  
18 those as well.

19 Q. Okay. Thank you.

20 Can you tell me what the source is of your  
21 understanding of those constitutional requirements?

22 A. It would be the Rodrigues memo.

23 Q. Okay. Is there any other source that you've  
24 relied upon, whether it's documents or plaintiffs'  
25 counsel, for interpretations of those constitutional

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1 requirements?

2 A. Not that comes to mind.

3 Q. And are you planning to offer any opinions as  
4 to what the Constitution requires with regard to  
5 redistricting?

6 A. I wonder if you can more specific.  
7 Specifically are you asking about opinions I may offer  
8 about generally what the Constitution requires; or, for  
9 instance, in this particular case given the  
10 configuration of the geography of the state, the  
11 Constitution would require that this district be  
12 configured this way?

13 Q. Let's start with both. Are you planning on  
14 offering any opinions that in general the Florida  
15 Constitution requires?

16 A. Once again, I don't know exactly at all what  
17 I'm going to be asked at trial. But beyond restating  
18 the constitutional standards as written, I have no  
19 specific plans to offer, you know, general opinions  
20 about what the Constitution requires beyond anything  
21 contained in my written report.

22 Q. Okay. Would you hold yourself out as an  
23 expert on what the Florida Constitution requires with  
24 regard to redistricting?

25 A. When you say "requires" that's like --

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1 Q. In general. Do you consider yourself a legal  
2 expert who's qualified to offer an opinion about what  
3 the Florida Constitution requires with regard to  
4 redistricting in general?

5 A. I am not a legal expert, no.

6 Q. With regard to your plan -- and we've talked  
7 about this a little bit. With regard to your plan do  
8 you anticipate offering opinions that the Florida  
9 Constitution would require you to draw lines certain  
10 ways?

11 A. Again, I don't know what I'll be asked but  
12 it's possible that I may have opinions of that nature,  
13 you know, explaining as we've talked -- discussed today,  
14 choices that were made in drawing my illustrative maps.

15 Q. Would it be more fair to say that your  
16 opinions would be that it's your understanding that this  
17 is what's required and so that's why you drew the lines  
18 this way?

19 A. That sounds accurate, yes.

20 Q. Okay. Thank you. I appreciate that.

21 I know there's a lot in your expert report  
22 that we have not touched on today. But is there  
23 anything that we have not discussed or that is not in  
24 your expert report that you are planning to offer as an  
25 opinion at trial?

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1 A. No.

2 Q. Is there any additional analysis or work that  
3 you are planning to do in addition to the work that  
4 you've already done, besides (inaudible), outside the  
5 scope of your expert report between now and the trial?

6 A. No.

7 Q. And then have you -- since we're on Zoom I  
8 have to ask. Have you been in communication with  
9 anybody since this deposition began at 2:30?

10 A. No.

11 MS. PRICE: I think that's all I have, Doctor.  
12 Thank you so much. I appreciate your time today.

13 THE WITNESS: Thank you.

14 CROSS-EXAMINATION

15 BY MR. WARREN:

16 Q. Dr. McCartan, a few short questions.

17 Ms. Price asked you about comparisons between  
18 your Plans A, B, and C and the Enacted Plan with respect  
19 to the utilization of geopolitical boundaries.

20 Do you remember that?

21 A. Yes.

22 Q. Do you know whether your Plans A, B, and C  
23 have more, fewer, or the same number of county splits as  
24 the Enacted Plan?

25 A. I do know that.

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1 Q. How can you answer?

2 A. Yeah. My instructions were to remove the  
3 portion of 16 in Pinellas County. So that necessarily  
4 eliminated a county split. My further addressments did  
5 not, you know, account for that change, did not  
6 introduce additional county splits. So they would all  
7 have one fewer county split than the Enacted Plan.

8 Q. Same question with municipal splits, the  
9 splits of incorporated municipalities?

10 A. To the best of my recollection all the  
11 adjustments I made after moving 16 for Pinellas County  
12 did not introduce new municipality splits. Obviously  
13 moving the portion of 16 and the city of St. Petersburg  
14 eliminated that municipality split. So the number of  
15 municipality splits would have decreased by one in all  
16 three maps.

17 MR. WARREN: I think that's all. Thank you.

18 MS. PRICE: I have nothing further to ask.

19 THE COURT REPORTER: Do --

20 MS. PRICE: And we will order.

21 THE COURT REPORTER: Does the witness wish to  
22 read the transcript?

23 THE WITNESS: Yes.

24 THE COURT REPORTER: Mr. Warren, did you need  
25 a copy?

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1 MR. WARREN: No, thank you.

2 THE COURT REPORTER: I don't know if anyone  
3 else on the line needed a copy?

4 MR. RABAN: Randall Raban; again, with  
5 Holtzman Vogel. If I could get a copy, that would  
6 be great.

7 Thank you.

8 THE COURT REPORTER: Will do.

9 Ms. Price, is ten business days sufficient?  
10 That's our normal turnaround.

11 MS. PRICE: That's your normal? Can we do --  
12 we might need to do an expedited. A week is great.

13 THE COURT REPORTER: Okay. So that would  
14 be -- so the 9th is sufficient, Monday?

15 MS. PRICE: Yes.

16 THE COURT REPORTER: Mr. Raban, did you need  
17 your copy expedited, or are you good with regular  
18 turnaround on that?

19 MR. RABAN: I need it expedited as well, and I  
20 put my email in the chat.

21 THE COURT REPORTER: Okay. Thank you.

22 (The reading and signing of this deposition is  
23 not waived, and the taking of this deposition  
24 concluded at 4:24 p.m.)  
25



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DEPOSITION ERRATA SHEET

Our Assignment No. J12075395

Case Caption: Hodges, et al., vs. Albritton, et al.

DECLARATION UNDER PENALTY OF PERJURY

I declare under penalty of perjury that I have read the entire transcript of my Deposition taken in the captioned matter or the same has been read to me, and the same is true and accurate, save and except for changes and/or corrections, if any, as indicated by me on the DEPOSITION ERRATA SHEET hereof, with the understanding that I offer these changes as if still under oath.

Signed on the \_\_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.

\_\_\_\_\_  
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CERTIFICATE OF REPORTER

STATE OF FLORIDA

COUNTY OF HILLSBOROUGH

I, Jennifer Figueroa, Registered Professional Reporter, certify that I was authorized to and did stenographically report the foregoing deposition remotely via videoconference, Pages 1 through 75; and that the transcript is a true record of the testimony given by the witness.

I further certify that I am not a relative, employee, attorney, or counsel of any of the parties, nor am I a relative or employee of any of the parties' attorneys or counsel connected with the action, nor am I financially interested in the action.

Dated this 9th day of December, 2024.



Jennifer Figueroa, RPR

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CERTIFICATE OF OATH

STATE OF FLORIDA

COUNTY OF HILLSBOROUGH

I, Jennifer Figueroa, Registered Professional  
Reporter, Notary Public, State of Florida, certify that  
CORY McCARTAN, Ph.D., appeared before me remotely via  
videoconference on the 2nd day of December, 2024, and  
was duly sworn.


WITNESS my hand and official seal this 9th day  
of December, 2024.

Identification:

Personally known ☐ or produced identification ☒.

Type of identification produced:

Pennsylvania driver's license.



Jennifer Figueroa, RPR  
Notary Public, State of Florida  
Commission No.: HH 101741  
Commission Expires: 03/08/2025

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