EXHIBIT R

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA

GEORGIA STATE CONFERENCE OF NAACP, et al.,	)	No. 1:21-CV-5338-ELB-SCJ-SDG
Plaintiff,	)	
vs.	)	
STATE OF GEORGIA, et al.,	)	
Defendant.	)	

VIDEOTAPED 30(b)(6) and 30(b)(1) DEPOSITION OF
LEGISLATIVE AND CONGRESSIONAL REAPPORTIONMENT OFFICE
(MS. GINA WRIGHT)
January 26, 2023
9:17 a.m.
18 Capitol Square SW
Atlanta, Georgia

Reported by: Marcella Daughtry, RPR, RMR
CA CSR 14315
GA No. 6595-1471-3597-5424

to that at that time. I think I was able to get them -- well, we did have a meeting in order for me to explain the midst of -- being in the middle of changing districts would be a very challenging time to change their precincts, but it's possible that I did look at their pending precinct layer that they chose not to adopt at that time.

Q There's a college in Oxford, right?

A I don't know.

Q Okay. Would splitting a college be splitting a community of interest?

A It could be defined as such.

Q Okay.

A We don't have information on college campuses, though, in our system to show us where those defined boundaries are. And we did bump into that at a public hearing from another college, who questioned the same thing. And in their case it had to do with the precincts dividing the campus. We were holding the precincts and, therefore, it split the campus. But without being given that information to define those communities, it's very hard to know where that would be defined -- what that would be defined as.

Q You mentioned earlier that sometimes you need to split precincts in order to meet deviation

requirements?

A Yes.

Q Do you recall why you split this precinct?

A I do not. Population -- I'm sure it would have been population based.

Q Do you know the racial composition of the precinct that is split on this image?

A No, I do not.

Q When you were discussing drawing the Congressional map, did anyone ever ask you to split a precinct?

A In specific terms, no; but knowing that to get the deviations to zero, I think that was known that that would be the way that you would achieve that.

Q There was an understanding that as a consequence of some of the requests, precincts would need to be split?

A No, not as a -- not as a consequence of the request, but as a consequence of getting the deviation to a perfect zero deviation, it would be virtually impossible to go through the map -- and I haven't tried it -- but to try and draw a zero deviation map without splitting a precinct.

Q Okay. Do you remember talking -- do you remember the working session we were talking about

A Who did I have these discussions --
Q Yes.
A -- with?
That would have been with Chairman Kennedy.
Q So did Chairman Kennedy convey Senator Strickland's position about SD 17 to you?
A I don't know that he conveyed a position about it.
Q Okay.
A I think the idea was to draw a district that would be a Republican district.
Q So Chairman Kennedy told you to draw a district that would allow Strickland to win?
A I don't know that it's -- it's hard to bring out explicit details of conversations because I don't know that he said that word for word --
Q Yeah, I understand.
A -- verbatim, but that was the understanding. I think for all the senators there was, you know, drawing a district that would allow any incumbent senator to continue to be reelected was something that they considered.
Q Was there any direction about how Chairman Kennedy wanted you to draw SD 17?
A I don't know if -- if I recall specific

A -- which caused then the effect of moving.
Q Okay. Do you think new Senate District 48 is compact?
A Yes.
Q Going back to the Senate District 17, which you can see on page 1 of Exhibit 8, do you think Senate District 17 is compact?
A It is not as compact as some districts would be. Some of that may be in part due to the shapes of the county lines there that cause it to have a bit of a jagged appearance, but it is not as compact as other districts might be.
Q Do you recall why Newton County is split between Senate District 17 and 48?
A It had previously been split between them.
Q Right. Did you talk about trying to make that county whole as part of the enacted plan?
A I don't recollect a conversation about trying to make Newton County whole. And both of the senators who represent it do a lot of work in that county, so they -- neither of them mentioned trying to give it up.
MR. CANTER: How long have we been going?
THE VIDEOGRAPHER: 36 minutes.
MR. CANTER: I'm going to provide to the court reporter Exhibit -- what should be marked as Exhibit 11.

sequence, so...

A I understand.

Q Yes. I just wanted to ask, you spoke at one point about communities of interest and how you -- about how you implement that as a map drawer. And just a couple of follow-up questions about that.

Could a city or town or sort of geographic community be a community of interest?

A It could be if they defined themselves or felt that they were a community of interest.

Q And let me back up for a second. Would it be fair to say that a community of interest is a community of some shared interest that's capable of representation?

A Are you -- you're saying to define a community of interest?

Q Yeah.

A Yes. I think that that's more or less what it would be, something that has a shared resource or a shared interest of some sort.

Q It could be a shared economic or commercial interest?

A Yes.

Q It could be -- I think you mentioned this earlier, but it could be a connection to a certain, you know, road or transportation infrastructure?

A Transportation sometimes, but I think more often than not, communities of interest are sharing something more, yeah, a little bit more connecting, I think.

Q It could be a shared interest in a school system?

A Yes.

Q It could be shared characteristics of people in a community, folks that work in the same place or have similar needs?

A Sure. There are a lot of ways to define it, I think.

Q Would you consider metropolitan or micropolitan statistical areas, those areas that are defined by the Census, as potential communities of interest?

A Not really. Those are a little larger than what I would think of as a community of interest.

Q Okay. And is it possible when you are thinking about communities of interest, to take into account all of the different communities of interest that might possibly exist in an area?

A Could you say that one more time?

Q Is it possible to take into account all the different communities of interest that you might find or that might exist in an area or --

A Yeah, I think --

Q -- on a map?

A I'm not sure I'm clearly understanding the question, but I think there are possible ways where communities of interest might overlap in certain areas. It could be because they're different -- there are different shared interests in a similar area, so it's very hard to gauge exactly what one might and define as a community of interest. Because in one case they might define themselves as that here, and then other people in that same community might not define themselves as a community.

Q Okay. I don't -- I don't think I have -- actually have any other questions, but thank you so much, Ms. Wright.

A Thank you. Hope you feel better.

MR. SAVITZKY: Thanks.

MR. JAUGSTETTER: Okay. Anybody else on Zoom? Okay. Anybody else in the room?

MR. TYSON: I have some questions. If I can just grab your microphone.

EXAMINATION

BY MR. TYSON:

Q All right, Ms. Wright. Good afternoon.