

Exhibit D

1 IN THE UNITED STATES DISTRICT COURT
2 NORTHERN DISTRICT OF ILLINOIS
3 EASTERN DIVISION
4 JULIE CONTRERAS, IRVIN)
5 FUENTES,)
6 ABRAHAM MARTINEZ, IRENE)
7 PADILLA, and)
8 ROSE TORRES,)
9 Plaintiffs,)
10 v.) Case No. 1:21-cv-3139
11 ILLINOIS STATE BOARD OF)
12 ELECTIONS,) Circuit Judge
13 CHARLES W. SCHOLZ, IAN) Michael B. Brennan
14 K. LINNABARY,) Chief Judge
15 WILLIAM J. CADIGAN,) Jon E. DeGuilio
16 LAURA K. DONAHUE,) Judge Robert M. Dow,
17 WILLIAM R. HAINE,) Jr., Three-Judge Court,
18 WILLIAM M. MCGUFFAGE,) Pursuant to 28 U.S.C. §
19 KATHERINE S. O'BRIEN,) 2284(a)
20 and CASANDRA B. WATSON)
21 in their official)
22 Capacities as members)
23 of the Illinois State)
24 Board of Elections,)
25 DON HARMON, in his)
 official capacity)
 As President of the)
 Illinois Senate, and)
 THE OFFICE OF THE)
 PRESIDENT OF THE)
 ILLINOIS SENATE,)
 EMANUEL CHRISTOPHER)
 WELCH, in his official)
 capacity as Speaker of)
 the Illinois House of)
 Representatives, and)
 the OFFICE)
 OF THE SPEAKER OF THE)
 ILLINOIS HOUSE)
 OF REPRESENTATIVES,)
 Defendants.)
 ZOOM DEPOSITION OF LILIA FERNANDEZ,
 Ph.D., a Witness, taken on remotely behalf of the
 Defendants before Peggy E. Corbett, CSR, CCR,
 RDR, pursuant to Notice on the 3rd day of

1 December, 2021, at the offices of the witness, 57
2 Joyce Kilmer Avenue, Lucy Stone Hall B-2020,
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I N D E X

WITNESS:	PAGE
LILIA FERNANDEZ, Ph.D.	
EXAMINATION BY MS. CALDWELL	5
EXAMINATION BY FERNANDEZ DEL CASTILLO	88
EXAMINATION BY MR. ARMSTRONG	93
CERTIFICATE	98

1
2
3
4
5
6
7
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

E X H I B I T S

NO.	DESCRIPTION	PAGE
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EXHIBIT 1	Report of Witness (Labeled Exhibit 6 on the first page)	19
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Reporter's Note: The original exhibits were submitted to the court reporter for copying and distribution with retention by Ms. Caldwell thereafter.

1 (Deposition commenced at 9:00 a.m.)

2 LILIA FERNANDEZ, Ph.D.,

3 a Witness, being first duly remotely sworn,

4 testified under oath as follows:

5 EXAMINATION

6 BY MS. CALDWELL:

7 Q. Hi, Dr. Fernandez. My name is Sheridan
8 Caldwell. I am from the law firm of Latham &
9 Watkins. I represent the defendants in this
10 case. Thank you for being here today. We
11 appreciate your time. Where are you located
12 right now?

13 A. I am connecting from home in New
14 Brunswick, New Jersey.

15 Q. Oh, great, and any reason that you
16 wouldn't be able to provide truthful and accurate
17 testimony today?

18 A. No.

19 Q. Have you been deposed before?

20 A. No, I have not.

21 Q. Okay. So I'll just go over some of the
22 ground rules which are even a little bit
23 different here than normal because we're in a
24 virtual setting. For the court reporter, Peggy,
25 who you just saw we'll need to create a clear and

Page 5

1 accurate record, and, you know, everything needs
2 to be able to go down on paper, so we should try
3 not to speak over each other, and I'll try to,
4 you know, let you finish your answer before I
5 speak again.

6 I would appreciate it if you would try
7 to let me finish my question before you speak,
8 just so everything is clean, and the court
9 reporter will also need verbal answers, which,
10 you know, I think makes sense, and usually yes or
11 no is better instead of "uh-huh." Sorry, do you
12 have a question?

13 A. I'm sorry to interrupt you, but I didn't
14 catch the first part of that sentence you just
15 said. Could you repeat that, please.

16 Q. That the court reporter needs verbal
17 answers --

18 A. Thank you.

19 Q. -- as opposed to what I just did, which
20 was a nod, or saying "uh-huh" or "huh-uh" which
21 can be less clear.

22 A. Understood.

23 Q. And I may try to do this, as well, so
24 this is also a reminder to me, but we should try
25 to avoid double-negatives or, you know, other

1 turns of phrase that are unclear, and if I were
2 to question poorly, like I just said, I sometimes
3 catch myself with a double-negative, I'll just
4 ask you if it's okay if I re-word it and I might
5 have to try to, you know, go over it to make sure
6 again that everything comes out clearly and I'm
7 not asking you anything convoluted.

8 What else? If you don't understand my
9 question, feel free to ask me to clarify. I may
10 be able to try to even rephrase. If you need a
11 break, definitely let me know. If there is a
12 question pending, I will ask that you answer the
13 question before we take the break, but we can,
14 you know, build in breaks even ahead of time if
15 you know there's a certain block of time you'd
16 like us to plan a break, that's something we can
17 definitely do.

18 And if your counsel, Mr. Fernandez,
19 objects to my question, you'll still need to
20 answer the question unless he specifically
21 instructs you not to answer it for some reason
22 like privilege or, you know, attorney work
23 product, something like that, but otherwise, you
24 know, he may object, I'll ask my question, your
25 attorney may object, and then you still need to

1 proceed to answer.

2 And like I said, with it being a remote
3 setting I just want to make sure that you're
4 aware that kind of the same as it would be if we
5 were in person, you shouldn't be communicating
6 with counsel while we're, you know, going through
7 the questions, so please don't be texting or
8 e-mailing or IME-ing each other or anything like
9 that while you and I are actually speaking.
10 Counsel shouldn't be messaging you and you
11 shouldn't, you know, be responding to anything.

12 And if you do have any questions that
13 you need to ask counsel, like something about
14 privilege that you're worried about, I'm hoping
15 that won't be a big issue, but let me know so
16 that you can confer about it privately. It just
17 shouldn't be happening as I said, you know, while
18 I'm asking questions.

19 And also if you haven't already, if you
20 could please make sure that your phone is silent
21 and put away so that there's no, you know, kind
22 of risk of anything popping up, that would be
23 great. Any chat functions that you have open on
24 your computer if you could close those or
25 minimize or whatever, that would be great.

1 And then do you also, since I can't see
2 your full desk, do you have anything on the desk
3 in front of you right now?

4 A. My desk is very cluttered, I have to
5 admit, but the only -- I only have a couple of
6 things directly in front of me, yes.

7 Q. Okay. Are they related to this case?

8 A. It's just a print-out of my testimony
9 and a print-out of the filing.

10 Q. Which filing is that?

11 A. I'm not sure what the official name of
12 this is, but it's the Complaint I guess that the
13 counsel filed on behalf of the plaintiffs.

14 Q. Oh, the Complaint. Does it have a date
15 on it or does it say at the top Document Number
16 something?

17 A. Yes.

18 Q. Okay.

19 A. 139.

20 Q. I'm sorry, which one?

21 A. Document Number 139.

22 Q. Oh, okay, and would that -- does it have
23 a cover page that says Contreras Plaintiffs
24 Corrected Proposed Alternative Remedial Plan and
25 Statement in Support?

1 A. Correct.

2 Q. Okay, I gotcha. So it's the Contreras
3 plaintiffs' submission. That's good to know.
4 Thank you.

5 And are either of those documents
6 annotated in any way? Do you have notes written
7 on them or, you know, sticky notes or anything?

8 A. No, I do not.

9 Q. Okay. So they are just clean copies?

10 A. Yes.

11 Q. Okay, and nothing else on your desk that
12 would be at all relevant to this case?

13 A. The only other thing I have is the list
14 of the Senate Factors, just to remind myself
15 which ones they are.

16 Q. Okay, and where is that list from or
17 where did you -- did you print that out from
18 somewhere?

19 A. Yes, from the original, the Senate
20 Factors that I originally was told that my
21 testimony would be based on.

22 Q. Okay. Are they included in some larger
23 document, or it's just a numbered list of the
24 factors?

25 A. No, it's simply a numbered list of the

1 factors.

2 Q. Okay.

3 A. Since I am a historian and not an
4 attorney, I just needed to have a reminder in
5 front of me.

6 Q. Sure.

7 MS. CALDWELL: Well, Counsel, I
8 don't think that that was necessarily one of the
9 things that you produced to us, that there was a
10 specific document of the Senate Factors as
11 underlying Professor Fernandez's report.

12 MR. FERNANDEZ DEL CASTILLO:
13 Professor Fernandez was retained to analyze the
14 Senate Factors and her entire report is all about
15 them, so I think in light of that, it's not
16 particularly surprising or prejudicial that she
17 has that list in front of her.

18 MS. CALDWELL: No, and I'm not
19 necessarily saying it is. There is just
20 different wordings of the factors that are
21 reproduced in different places.

22 MR. FERNANDEZ DEL CASTILLO: Well,
23 we're happy to disclose the list --

24 MS. CALDWELL: Okay.

25 MR. FERNANDEZ DEL CASTILLO:

1 -- even if -- there will be nothing surprising
2 there.

3 MS. CALDWELL: Yeah, no, I
4 understand that. I appreciate that. I would
5 just -- it would be nice if you would send us a
6 copy of the same one that she's working off of
7 just, so I have it. I would appreciate that.

8 Q. (BY MS. CALDWELL) And Dr. Fernandez,
9 if you wouldn't mind taking those things and
10 putting them to the side and I may ask you to
11 refer to your report at times but otherwise I'm
12 hoping we can just talk without reference to
13 those, you know, different papers.

14 A. Sure, that's fine. I have done that. I
15 only have the clean copy of my report in front of
16 me.

17 Q. Great, thank you. And again, hopefully
18 we can just go through the questions and I will
19 ask you to turn to certain pages of your report
20 from time to time, but otherwise, I appreciate if
21 you'd just leave it on the desk in front of you.

22 Okay, you are here today with attorneys
23 representing the plaintiffs, right?

24 A. Correct.

25 Q. And that's Mr. Fernandez from Maldef?

1 A. Correct.

2 Q. He's representing you, that's your
3 understanding, right?

4 A. Well, I was retained as an expert
5 witness for this case so I'm not sure if that
6 means that the attorneys with Maldef are my
7 counsel, as well, or you know, what the
8 technicalities are here in this situation.

9 Q. Okay. Well, he's representing you for
10 the purposes of this deposition, right?

11 A. Yes, I would assume so.

12 Q. And did you meet or speak with anyone in
13 advance of today's meeting to prepare for the
14 deposition?

15 A. Yes. This is my first time
16 participating in a deposition, so the attorney
17 explained to me what I could expect and what the
18 process is like.

19 Q. And which attorney was that?

20 A. Mr. Fernandez.

21 Q. Okay. Anyone else?

22 A. Ms. Leticia Saucedo also joined the call
23 for a short period of time and just added some
24 additional insight into how the process works,
25 what a deposition, you know, format looks like.

1 Q. Okay, and how many times did you meet?

2 A. Just once.

3 Q. And for how long?

4 A. The call was approximately about two
5 hours I would say.

6 Q. And do you remember what day it was on?

7 A. Yes, yesterday.

8 Q. Okay. Did you review any documents
9 during that meeting?

10 A. Aside from my testimony, do you mean
11 or --

12 Q. Including it, just any document?

13 A. Yes, we reviewed my testimony. We
14 didn't go over it in detail. We simply discussed
15 it in general terms.

16 Q. Okay, and did you review any documents
17 outside of that meeting in preparation for your
18 deposition?

19 A. No, none that I can remember.

20 Q. And did you do anything else to prepare
21 for the deposition in any way?

22 A. No. I simply reviewed my expert
23 testimony, I went over what I had written and
24 what was included, and looked at some additional
25 local sources that I used in the testimony.

1 Q. And those are sources that are cited in
2 your report?

3 A. Yes, exactly.

4 Q. Do you remember specifically which
5 sources you reviewed in preparation?

6 A. I was looking at the Chicago Tribune,
7 looking at articles there.

8 Q. Okay. If you have some footnote
9 references that would be helpful. I think you
10 might have cited more than one Chicago Tribune
11 article, if I remember correctly.

12 A. Yes, I cited a number of Chicago Tribune
13 articles.

14 Q. Uh-huh.

15 A. I can't remember right now which ones
16 specifically.

17 Q. Okay, that's fine. Have you ever worked
18 with Maldef before or Mr. Fernandez?

19 A. No, I have not.

20 Q. What about Winston & Strawn, which is
21 another law firm?

22 A. No, I have not.

23 Q. Okay, and you're not currently working
24 on any other matters with Maldef, are you?

25 A. No, I am not.

1 Q. Okay, and the same for Winston & Strawn?

2 A. Correct, I am not currently working with
3 either organization for any other matters.

4 Q. Okay, and who first contacted you about
5 working on this case?

6 A. Ms. Leticia Saucedo sent me an e-mail
7 and reached out to me in that fashion.

8 Q. Okay, and when was that?

9 A. That was probably mid-September if I
10 remember correctly.

11 Q. Were you retained around that same time
12 or when were you retained?

13 A. Shortly thereafter. I don't remember
14 the exact date when we signed the retainer
15 contract, but shortly thereafter.

16 Q. Okay, and who all would have retained
17 it? Was it just you specifically or was anybody
18 else involved?

19 A. I'm only aware of, or you know, are
20 familiar with the individuals of my own
21 individual retainer. I understand they have
22 other expert witnesses, but they were not
23 involved in my -- in our communications or in
24 our -- my retainer.

25 Q. Okay. So there's no one else who you

1 work with who was also retained to help you with
2 your report or anything?

3 A. No, there was not.

4 Q. Okay, and about how many hours do you
5 think you would have spent working on your
6 report?

7 A. Oh, I don't remember right now the total
8 that I kept track of, but I want to say it was an
9 average of 10 hours a week over a period of 6
10 weeks approximately.

11 Q. Okay, so about 60 hours?

12 A. Roughly I would say.

13 Q. And that was just you working on it
14 without assistance from anyone else?

15 A. I did have a research assistant, a
16 student who helped me to locate maps that I was
17 looking for that kind of information.

18 Q. Okay, and what was his or her name?

19 A. Her name is Malina Ortiz.

20 Q. And she's a student at the university
21 where you teach?

22 A. Yes. She is an undergraduate student,
23 and she worked for me as a research assistant.

24 Q. Okay, and do you know about how much
25 time she spent working on this case?

1 A. She probably spent about three to four
2 hours in total locating the maps, you know, the
3 legislative districts, the voting districts, that
4 kind of thing.

5 Q. Okay, and those maps are not in your
6 report, correct?

7 A. Correct.

8 Q. But they informed your opinions?

9 A. Yes, I consulted them in order to get a
10 better understanding of what the districts, how
11 the districts have changed over time.

12 Q. Okay.

13 MS. CALDWELL: Okay, counsel, I
14 think that's another thing that she relied upon,
15 it seems like, that it would be nice if we could
16 get a copy of.

17 MR. FERNANDEZ DEL CASTILLO:
18 Absolutely.

19 Q. (BY MS. CALDWELL) Thank you. Have you
20 performed any additional work on this case other
21 than the meeting with counsel since the time that
22 you finalized your report?

23 A. I'm sorry, I don't understand the
24 question. I'm sorry, could you repeat it,
25 please.

1 Q. Sure, so I was asking before about how
2 much time you spent writing your report. Did you
3 spend any other time working on this case after
4 you were done writing your report?

5 A. No, not that I can remember, other than
6 the preparation for this deposition.

7 (Exhibit 1 was marked by the
8 reporter for identification.)

9 Q. (BY MS. CALDWELL) Okay, great. Okay,
10 for the court reporter, I know that Dr. Fernandez
11 already has a copy, but I'd like to introduce as
12 an exhibit, we'll call it Fernandez 1, just to
13 specify that it's part of this deposition, as we
14 have multiple depositions happening at once, and
15 it will be, I can e-mail it to you after this,
16 Peggy, if that's all right, a copy of
17 Dr. Fernandez's expert report that was submitted
18 in this case on November 10th, 2021.

19 THE REPORTER: That would be fine.

20 Q. (BY MS. CALDWELL) Okay, and just to
21 have you confirm, Dr. Fernandez, is what I said
22 correct, your report was submitted to the Court
23 on November 10th, 2021?

24 A. I believe so. I sent a copy in advance
25 to the attorneys and I'm not privy to, you know,

1 the time and date of which they filed it or
2 submitted it along with the filing.

3 Q. Okay. If you'll look at the signature
4 page on Page 2 of your report, it says, "Executed
5 on November 8th in New Brunswick, New Jersey."
6 Is that November 8th, 2021?

7 A. Yes, it is, and I'm sorry, I do not have
8 that page in front of me right now.

9 Q. Okay.

10 A. I printed that out, but I believe I know
11 what you're referring to.

12 Q. So okay, yeah, I'm referring to the
13 actual filing with the caption page that's
14 titled, "Declaration of Dr. Lilia Fernandez In
15 Support of Plaintiffs' Proposed Alternative
16 Remedial Plan," and it has what I believe is a
17 copy of or an actual signed original of your
18 signature, but that sounds correct to you, that
19 it was signed on November 8th, 2021?

20 A. Yes, correct, that is correct.

21 Q. And then is what you have in front of
22 you a document that has a cover page titled
23 "Expert Testimony on Latino Discrimination in
24 Illinois," on the top right it's dated
25 November 2nd, 2021?

1 A. Yes, that's correct.

2 Q. So that was the final version of your
3 report that was submitted to the Court, correct?

4 A. Yes, that is correct.

5 Q. Great. Okay, it sounds like you are
6 already considering this November 2nd document
7 your actual report, and that's what I was
8 planning to do, was to call it your report, as
9 well, even though there was a document submitted
10 to the Court with your signature also called a
11 report, but we'll consider the document titled,
12 "Expert Testimony on Latino Discrimination in
13 Illinois," that's what I'll refer to as your
14 report just for clarity. Does that sound good?

15 A. Yes, that's fine.

16 Q. Great, all right. On Page 1 of your
17 report there is a section titled,
18 "Qualifications," and the first paragraph under
19 that heading says, "I am a scholar of 20th
20 century Chicago Latino history and earned a Ph.D.
21 in Ethnic Studies."

22 At the bottom of that paragraph it
23 says that you have been recognized as a
24 professional historian through nomination and
25 election to various committees in these and other

1 associations. So would you consider yourself an
2 expert in 21st century Chicago Latino history, at
3 least the history so far?

4 A. No, I would not claim to be an expert on
5 21st century history. I would say 20th century
6 history.

7 Q. Okay, 20th century, thank you. And
8 generally would you say this paragraph is a fair
9 summary of your expertise?

10 A. Yes. I would say that this is, you
11 know, a typical summary of how I would describe
12 myself as a historian and as a scholar of Latino
13 history in Chicago.

14 Q. Great, and would you consider yourself
15 an expert in Illinois politics?

16 A. No, I would not consider myself an
17 expert in Illinois politics.

18 Q. Okay. Would you consider yourself an
19 expert in demography?

20 A. No, I have not been trained in
21 demography.

22 Q. Okay. What about legislative
23 redistricting?

24 A. No, I have not been trained in
25 legislative redistricting.

1 Q. And just to -- this is only to clarify,
2 you know, the scope of your report, I just want
3 to confirm that you're not offering any opinions
4 about how the legislative redistricting maps at
5 issue in this case were drawn, correct?

6 A. I'm sorry, did you say I'm not offering
7 expert -- could you just simply repeat the
8 question? I apologize.

9 Q. Sure, of course. You're not offering
10 any opinion on how the legislative redistricting
11 maps at issue in this case were drawn, correct?

12 MR. FERNANDEZ DEL CASTILLO: Object
13 to form.

14 THE WITNESS: Do I go ahead and
15 answer? I'm unclear as to how to proceed.

16 Q. (BY MS. CALDWELL) Yes, you should
17 answer.

18 A. Okay, no, I am not offering testimony or
19 expertise on legislative maps. I am a historian,
20 and so I am offering expertise and knowledge on
21 the history of Latinos in the Chicago area and
22 Illinois generally.

23 Q. Thank you, or not correct -- you know,
24 your answer is what it is, but that's what I was
25 trying to confirm. Thank you.

1 And you are also not offering an opinion
2 on whether the maps were drawn properly, right?

3 A. No, I am not.

4 Q. Okay. You're not offering an opinion --
5 you're also not offering an opinion on the
6 Contreras Plaintiffs' proposed remedial map,
7 correct?

8 A. No, I am not.

9 Q. Okay, and you're not offering any
10 specific opinion about the districts that they
11 propose changing, correct?

12 A. No, I am not.

13 Q. You're also not offering an opinion on
14 the effect that the Contreras plaintiffs' maps
15 may have?

16 A. No, I am not.

17 Q. Okay, and the same goes for the related
18 cases. I'm not sure if you're aware of the
19 McConchie case and the NAACP case that are
20 related to this one.

21 You're also not offering an opinion
22 about any of the maps in those cases, right?

23 A. No, I am not. I'm not familiar with
24 those cases.

25 Q. Okay, you're also not offering an

1 opinion on the motivations of any specific
2 legislators who helped draw the maps that are at
3 issue in this case, right?

4 A. No, I am not.

5 Q. And you're not offering any opinion on
6 the types of data that should have been used to
7 draw the maps, correct?

8 A. You're asking if I'm offering an opinion
9 on what data should have been used to draw the
10 maps?

11 Q. Correct.

12 A. No, I am not.

13 Q. And you're not offering an opinion on
14 the types of political candidates that Latinos
15 prefer, are you?

16 A. No, I am not.

17 Q. You are not offering an opinion on
18 whether all Latinos voted the Block, correct?

19 A. Would you repeat that? Could you repeat
20 the question?

21 Q. Sure. You are not offering an opinion
22 on whether all Latinos vote as a whole block, are
23 you --

24 A. No, I am not.

25 Q. -- or whether white voters vote as a

1 block, correct?

2 A. No, I am not offering an opinion on
3 that.

4 Q. Okay, thank you. I just had to get all
5 of that out of the way, so thank you for bearing
6 with me.

7 So I saw on your resumé that you're
8 currently the Henry Rutgers Term Chair and
9 Associate Professor at Rutgers University. Is
10 that still correct since the time of filing of
11 your report, right?

12 A. Yes, correct.

13 Q. And you have held that position since
14 the Fall of 2016?

15 A. Yes, that is correct.

16 Q. Would it be fair to say generally that
17 you have been working as a professor since you
18 finished your post-doctoral fellowship in 2006?

19 A. Yes, that is correct.

20 Q. Great. The one year I wasn't sure
21 about, you were a visiting scholar at
22 Northwestern. Is that still a professor
23 position?

24 A. No, that is not. I was on sabbatical
25 that year, and so that was an affiliation with

1 Northwestern University while I was doing
2 research, on-going research for my current
3 project.

4 Q. Oh, great. I went to Northwestern for
5 law school, so I'm a fan. It is great.

6 I just want to confirm, you are not a
7 lawyer, right?

8 A. No, I am not.

9 Q. Okay, so you're not offering any legal
10 opinions here --

11 A. No, I am not.

12 Q. -- or any opinions about the
13 constitutionality of any of the maps at issue,
14 right?

15 A. No, I am not.

16 Q. Okay. I also saw on your resumé that
17 you wrote a book called "Brown in the Windy City,
18 Mexicans and Puerto Ricans in Post-War Chicago."
19 I assume that refers to the Post-World War II
20 period; is that correct?

21 A. Yes, correct, for periods in the 21st
22 century, post-war generally is referring to after
23 World War II.

24 Q. Great. And you have a very long list of
25 published works, and it looks like a number of

1 them cover that same time period. Is that a fair
2 characterization?

3 A. Yes, that is correct.

4 Q. And I think your dissertation for your
5 Ph.D. was also on sort of that same time period;
6 is that correct?

7 MR. FERNANDEZ DEL CASTILLO: Object
8 to form.

9 A. Yes.

10 Q. (BY MS. CALDWELL) And what about your
11 manuscript in progress that I think might have
12 been when what you were referring to for your
13 sabbatical year? On your resumé it's titled, "A
14 History of Latino Chicago Class Solidarities and
15 Coalitional Politics." What time period does
16 that cover, if you're far enough in the process
17 to share?

18 A. I can share that generally it covers the
19 period from about the 1950s through about the
20 1980s.

21 Q. Okay, great, thank you. Can you tell me
22 a little bit about the coalitional politics
23 aspect? I'm not familiar with that.

24 A. When I am referring to politics, I'm not
25 referring to necessarily electoral politics or

1 voting. I'm talking politics with a lower case
2 "p," and the relationships, the alliances or
3 solidarity that Latinos of different ethnic
4 backgrounds form with one another.

5 Q. Great, thank you for explaining. I also
6 saw on your resumé that you receive grants
7 sometimes. I just want to confirm whether any of
8 those were funded by, whether any of those grants
9 were funded in whole or in part by Maldef or
10 anyone affiliated with this case.

11 A. No, they have nothing.

12 Q. Okay. And the same for anyone involved
13 in any of the affiliated cases as far as you
14 know?

15 A. As far as I know, no, none of my funding
16 has come from any of the organizations affiliated
17 with this case.

18 Q. Okay, great, and I didn't see anywhere
19 on your resumé or in the other materials
20 submitted any list of any other matters where you
21 acted as an expert. Have you ever been an expert
22 before in a legal matter?

23 A. No. I have not served as an expert in
24 any legal matters previously.

25 Q. Okay. Have you ever been retained but

1 not written a report?

2 A. No, I have not.

3 Q. Okay. All right, you said you have
4 re-reviewed your report since it was submitted to
5 the Court, correct?

6 A. Yes, correct.

7 Q. And on that review did you note any
8 deletions, corrections or additions that you
9 wanted to make?

10 A. When I submitted the report, yes, I
11 noticed some minor grammatical errors, for
12 example of, you know, missing words, that sort of
13 thing.

14 Q. I didn't notice many. I feel like I
15 always have typos, so I didn't catch many, but
16 okay, but there's no substantive changes that you
17 wanted to make, right?

18 A. No nothing substantive that I think
19 would dramatically change the report. I, you
20 know, of course there's always much more research
21 that could be done. This could be an on-going
22 process. But given the time constraints of this
23 case I, you know, did as much work as I could.

24 Q. And you still stand by this report it
25 sounds like, right?

1 A. Yes, I do.

2 Q. Okay. All right, and the report
3 contains a complete statement of all of the
4 opinions that you intend to express in this case?

5 A. It "contains a complete statement of all
6 of the opinions I intend to state;" I'm not sure
7 what you mean by that.

8 Q. Sure, let me rephrase. Does your report
9 contain a complete statement of all of the
10 opinions you're offering in this case as an
11 expert?

12 A. There are additional opinions I could
13 offer that, you know, I didn't have a chance to
14 write into the report, again because of the time
15 constraints, so I would say that I -- there are
16 other thoughts I could add, you know, to weigh in
17 on the matter in this deposition now.

18 MR. FERNANDEZ DEL CASTILLO:
19 Sheridan, when you're done with your line of
20 questioning, would you mind if we take a short
21 break?

22 MS. CALDWELL: Sure. Yeah, I'll
23 just wrap up here.

24 Q. (BY MS. CALDWELL) Okay, under -- so
25 under the Federal Rules your report is meant to

1 contain a complete statement of all of the
2 opinions you're offering in this case, so if
3 there's anything beyond the report that you
4 intend to offer, I think that would be an issue
5 of, you know, amending the report or something
6 maybe a little more dramatic that it sounds like
7 you're not intending to do.

8 So that's what I mean, is under the
9 Federal Rules are all of the opinions that you
10 are putting forward as an expert in this case,
11 are they included in your report?

12 A. I understand what you mean now. Yes,
13 they are. I do not intend to offer anything that
14 departs dramatically from what I have shared in
15 this report.

16 Q. Okay, and you said "departs
17 dramatically," but I understand as we discuss
18 your report there will be, you know, you may
19 phrase things differently but the actual
20 substantive conclusions of your report, you don't
21 intend to alter those, right?

22 A. That is correct, yes.

23 Q. Okay.

24 A. That is correct.

25 Q. You don't -- I apologize for cutting you

1 off.

2 A. That's fine. Go ahead.

3 Q. Okay, and you don't intend to offer any
4 other opinions that would substantively differ
5 from those that are already in your report?

6 A. No, I'm not, I don't believe so.

7 Q. Okay, and your report contains all of
8 the base-using reasons for the opinions that you
9 intend to express in this case; is that right?

10 A. There are additional sources that might
11 further substantiate some of the points I have
12 made here that perhaps did not make it into the
13 footnotes, but I am not intending to rely upon
14 those or call those in here.

15 Q. Okay. So everything you need to support
16 your opinions in your report is contained within
17 the report itself?

18 A. Yes, I would say so.

19 Q. And you don't plan on submitting any
20 further reports at this time, correct?

21 A. Counsel has not asked me to submit any
22 additional materials, so at this point this is
23 what I have submitted and what I have, you know,
24 presented to the Court.

25 Q. Okay, and aside from what counsel has

1 asked you to do, you have no personal intention
2 of submitting an additional report, correct?

3 A. No, I do not.

4 Q. Okay. Now would be a good time to take
5 a break probably if you'd like to do that,
6 Mr. Fernandez.

7 MR. FERNANDEZ DEL CASTILLO: Yes,
8 Lilia, unless you want to keep going.

9 THE WITNESS: Well, I could take a
10 break. I would appreciate that.

11 MS. CALDWELL: Okay. Is 5 minutes
12 okay or would you prefer 10?

13 THE WITNESS: Go ahead.

14 MR. FERNANDEZ DEL CASTILLO: Let's
15 go ahead and take 10 and we won't take longer
16 breaks going forward.

17 MS. CALDWELL: Okay, that sounds
18 good.

19 (Recess)

20 Q. (BY MS. CALDWELL) Dr. Fernandez, if you
21 wouldn't mind thinking back to September when you
22 were first retained for this case, what did you
23 understand your assignment to be?

24 A. My assignment was to write a report on
25 the history of Latinos in Chicago, and Illinois

1 more generally, and examples of historical
2 discrimination.

3 Q. In your report itself you also have a
4 summary. Okay. Oh, actually, I'm sorry, that's
5 your declaration, which it sounds like you don't
6 have a copy of.

7 A. I do not.

8 Q. That's fine. So would you say your
9 report is limited to the subjects that you just
10 described as your assignment?

11 A. Yes. I tried to focus on examples of
12 historical discrimination Latinos have
13 experienced in the Chicago area, and Illinois
14 more generally, yes.

15 Q. Did your assignment either from counsel
16 or, you know, the way you were working on it
17 change at all during the course of when you were
18 writing your report?

19 A. Well, I got feedback as I was drafting
20 it, you know, providing initial drafts on the
21 format of the document, yes.

22 Q. So did the task at hand change?

23 A. No. The task at hand did not change. I
24 was still producing the report that I was hired
25 to produce.

1 Q. And you feel that you were able to
2 complete that assignment as it was originally
3 given to you?

4 A. In the timeframe that was allowed, I did
5 the best that I could, yes. There were more
6 things I would have liked to add into the report,
7 and my area of expertise only extends so far
8 through the 20th century, so if there had been
9 more time I could have added more, however, you
10 know, given our time constraints I produced as
11 much as I could.

12 Q. I think that's the mantra for all of us
13 on this case, if there were more time, so I
14 appreciate that. Thank you.

15 So you mentioned that you are familiar
16 with the Senate Factors, correct?

17 A. Yes. Counsel explained to me what the
18 Senate Factors are in these kinds of cases,
19 uh-huh.

20 Q. Did they explain that to you at the
21 outset?

22 MR. FERNANDEZ DEL CASTILLO: Lilia,
23 you don't have to discuss our conversations
24 outside of the context of your being retained, so
25 if -- if she asks you about those, I'm going to

1 object that it's privileged and direct you not to
2 answer.

3 THE WITNESS: Thank you. Okay.

4 Q. (BY MS. CALDWELL) Okay, well, my
5 question is -- sorry, I'm not sure if there's a
6 train going by.

7 MR. FERNANDEZ DEL CASTILLO: Sorry,
8 there's a police car, if we could just take a
9 minute not to ruin the transcript. I apologize,
10 it's Chicago.

11 Q. (BY MS. CALDWELL) Okay. Were you
12 advised of what the Senate Factors are at the
13 outset of receiving your assignment in this case?

14 A. Yes, I needed to understand the context
15 in which I was, you know, being retained to
16 produce a report.

17 Q. Did you understand your assignment to be
18 limited to certain Senate Factors?

19 A. I understood that my area of expertise
20 is primarily on Senate Factor 5, discussing
21 Senate Factor 5, and then if I had any insights I
22 could add into any of the other Senate Factors, I
23 could do that, as well.

24 Q. You weren't asked to provide an opinion
25 on the weight of any of the Senate Factors,

1 though, correct --

2 A. No, I was not.

3 Q. -- or how Senate Factor 5 might balance
4 in the totality of the circumstances test, right?

5 A. No, I was not.

6 Q. You're not opining on whether the Senate
7 Factors weigh in favor of one party or another,
8 right?

9 A. No, I am not.

10 Q. And your report doesn't specifically
11 mention Senate Factors or Senate Factor 5. Is
12 there a reason why you didn't discuss that?

13 A. I only mentioned it at the beginning
14 after the title page, Page 1, at the very top, I
15 mentioned, "This report offers expert testimony
16 on," and I quoted Senate Factor 5, under Section
17 2 of the Voting Rights Act, "the extent to which
18 (Latinos in Illinois) bear the effects of
19 discrimination in areas such as education,
20 employment and health which hinder their ability
21 to participate effectively in the political
22 process."

23 Q. But you don't mention Senate Factors
24 anywhere else in your report, just to confirm,
25 right?

1 A. I don't believe so. I don't remember
2 exactly.

3 Q. Okay. Did Plaintiffs' counsel provide
4 any specific materials for you to use in drafting
5 your report?

6 A. I had conversations with counsel and
7 explained that I did not have access to law
8 library databases, so I might need help with
9 looking at some legal articles. However, in the
10 time that I had to complete the report I didn't
11 have a whole lot of time to look at those
12 materials.

13 Q. So did they provide you anything at the
14 outset before you asked them about that?

15 A. I don't remember, to be honest with you.

16 Q. And did you ever end up making like a
17 specific request for materials sort of like you
18 were just mentioning?

19 A. I may have mentioned specific legal
20 cases, you know, historically involving Latinos
21 and voting rights in Illinois, but I did not, you
22 know, receive any texts or look at any texts of
23 those cases.

24 Q. So did you ask for those materials
25 specifically?

1 A. No. I did not ask for the materials. I
2 was simply pointing out, you know, such-and-such
3 case in 1980 whatever, in this case as well.

4 I may have cited some of them in my
5 report, but I did not review them in detail. I
6 reviewed summaries of those cases.

7 Q. Okay, counsel submitted to us a couple
8 of documents with your report. One of them was
9 an article titled, "Latinos in Chicago." Is that
10 something that they provided to you?

11 A. No, that's not something I'm familiar
12 with, no.

13 Q. Okay. This was also a sample report on
14 Senate Factors that have been submitted in
15 another case. Did they also provide that to you?

16 A. Not that I'm familiar with, no.

17 Q. Are all of the materials that you relied
18 upon cited somewhere in your report?

19 A. I would say the overall majority of
20 them, yes. There may have been something I
21 consulted that did not make it into a footnote,
22 but I tried to be as judicious as possible in
23 citing all of my sources.

24 MR. FERNANDEZ DEL CASTILLO:
25 Sheridan, if you're going to continue to ask for

1 our expert disclosures, it might be helpful if
2 you could show Dr. Fernandez the documents that
3 you're referring to.

4 Q. (BY MS. CALDWELL) Sure. It's actually
5 not very important. I just wanted to clarify if
6 she was forgetting something that you had sent
7 her, I thought those might jog her memory, but I
8 don't have specific questions about them right
9 now. I'll pull them up if I do, but thank you.
10 I am able to do screen share, so I'll do that if
11 I need to.

12 Okay, have you spoken directly with any
13 of the plaintiffs in this case, Dr. Fernandez?

14 A. No, I have not.

15 Q. And none of the plaintiffs in any of the
16 related cases either, right?

17 A. No, I have not spoken to anyone of them.

18 Q. Did you review any of the other expert
19 reports submitted in this case?

20 A. On the --

21 Q. I'm sorry, I'll narrow it to start, did
22 you review any of the expert reports submitted by
23 the plaintiffs in this case?

24 A. No, I have not.

25 Q. Okay. Did you speak to any of the other

1 Plaintiffs' experts?

2 A. No, I did not. I do not know them.

3 Q. Okay, and I know you said that you have
4 a copy of Document Number 139 filed in this case,
5 but do you have any copies of any of the other
6 filings in this case or did you read any of the
7 other filings in this case?

8 A. No, I did not.

9 Q. Oh, I'm sorry, did I cut you off?

10 A. I just wanted to confirm. Document 139
11 you mean is the actual filing that I mentioned
12 earlier?

13 Q. Yes, I believe so. It's titled,
14 Contreras Plaintiffs' Corrected Proposed
15 Alternative Remedial Plan and Statement in
16 Support.

17 A. Okay, yes, and your question was if I
18 had received any other files? The only other
19 document that I am privy to is the opposing
20 counsel's expert testimony which is a very long
21 document, so I did not get to read through it
22 carefully. I just kind of skimmed through it.

23 Q. I was going to ask about that next. Are
24 you referring to Dr. Lichtman's expert report?

25 A. Yes, exactly.

1 Q. And you reviewed portions of it you
2 said?

3 A. Just a few pages of it yes.

4 Q. Okay. Presumably the pages that
5 referenced your report?

6 A. Yes, correct.

7 Q. Okay. So often in expert reports
8 there's kind of a summary of opinions towards the
9 top, but I didn't see that in your report, so I
10 just wanted to make sure that I have the correct
11 kind of high level takeaways before we dive in,
12 so we'll get into more details, but let's see,
13 where is this?

14 So on the first page of your report in
15 that qualifications section again that we were
16 discussing earlier, the last paragraph I think
17 sort of wraps up or ties together a little bit
18 some of your conclusions. I'll just read you the
19 sentences that I am focusing on in the last
20 paragraph starting with the second sentence. It
21 says, "Upon reviewing existing primary and
22 secondary sources on Latinos in Chicago I have
23 concluded that Latinos have a long history of
24 racial discrimination in various areas that has
25 persisted for at least a century, thus I can

1 declare that Latinos bear the effects of this
2 discrimination which hinders their ability to
3 participate effectively in the democratic
4 process."

5 Would it be fair to say that this is
6 generally your high level conclusion of your
7 report?

8 A. Yes, it would.

9 Q. Okay, and so to break it down a little
10 bit, the first one, the first sentence says that
11 Latinos have a long history of racial
12 discrimination in various areas that has
13 persisted for at least a century, and when you
14 say "various areas," what are you referring to?

15 A. I'm referring to housing, employment,
16 education, relations with or, you know,
17 interactions with the State, that sort of thing.

18 Q. Oh, okay, I took it to mean geographic
19 areas, but it means sort of different -- the
20 different topic areas that you cover in your
21 report?

22 A. Yes, correct.

23 Q. Okay, and your report, it does also say
24 in that sentence "Latinos in Chicago," so is it
25 fair to say that your report is kind of focused

1 in on Chicago?

2 A. Yes. It focuses primarily on Chicago
3 because that has been my primary area of
4 research; however, I have done research outside
5 of the city in other parts of the state, as well.

6 Q. Okay, and when we talk about Chicago,
7 too, are you usually referring to the city
8 specifically or Cook County more generally?

9 A. Cook County more generally, the Chicago
10 area.

11 Q. Okay, great. And are you aware that
12 Contreras plaintiffs challenge the way that the
13 democratic legislative defendants drew the
14 redistricting map in specific geographic areas of
15 the state?

16 A. I'm sorry, that Contreras -- can you
17 repeat the question?

18 Q. Sure. I think you did mention earlier
19 that you maybe looked at some maps, so I just
20 want to make sure that you're aware that
21 Contreras plaintiffs challenge the legislative
22 redistricting map as to certain areas of the
23 state, it's not as to the entire state, so I just
24 want to confirm that you're familiar with that.

25 A. Yes, I am.

1 Q. Okay, and do you know what the specific
2 districts that they challenge are?

3 A. No, I don't recall right now.

4 Q. Okay. Do you -- are you familiar with
5 where geographically they are in the state?

6 A. No, I don't recall right now.

7 Q. Okay, and just to confirm, your report
8 doesn't refer to those specific districts at all?

9 A. I don't believe so, no.

10 Q. Your report's more organized by time
11 period instead of geography, right?

12 A. Yes, my report is organized
13 chronologically.

14 Q. And the time period subsections are
15 labeled by the years that they cover, right?

16 A. Yes, generally. In some places they are
17 labeled by the subject focus, such as employment
18 or housing, but generally they are -- it's
19 organized chronologically.

20 Q. Right, and the sort of subject matter
21 sections, I took those to be subheadings within
22 the timeline overall sections.

23 A. Yes, that is correct.

24 Q. Okay, so those are still kind of nested
25 within the general time period sections?

1 A. Yes, that is correct.

2 Q. Okay. So then kind of moving, going
3 back to the paragraph of your overall
4 conclusions, the second sentence was that Latinos
5 bear the effects of this discrimination which
6 hinders their ability to participate effectively
7 in the democratic process.

8 Would you characterize that conclusion
9 as sort of stemming from your first conclusion?

10 A. Yes, that is correct.

11 Q. So you view your report as presenting
12 evidence -- I'm sorry, let me start over and
13 rephrase if you don't mind.

14 Do you view your report as presenting
15 evidence about the present day struggle of
16 Latinos separate from the historical perspective?

17 A. I view my report as elaborating on how
18 historical experiences with discrimination have
19 informed the Latino experience in the 21st
20 century.

21 Q. Okay, but the evidence itself focuses on
22 the 20th century; is that right?

23 A. Yes, primarily.

24 Q. And that evidence supports your first
25 conclusion, which then leads to your second

1 conclusion?

2 MR. FERNANDEZ DEL CASTILLO: Object
3 to form.

4 Q. (BY MS. CALDWELL) That might have been
5 badly worded. Let me know if I should rephrase.

6 A. Yes, if you could repeat that, please --

7 Q. Sure.

8 A. -- or rephrase that.

9 Q. The historical evidence goes more to
10 your first conclusion, -- sorry, let me finish my
11 question.

12 So the historical evidence goes to your
13 first conclusion and is also the evidence that
14 supports your second conclusion?

15 A. Yes.

16 MR. FERNANDEZ DEL CASTILLO: Object
17 to form.

18 Q. (BY MS. CALDWELL) Okay, and then the
19 other place that I saw, you know, some high level
20 takeaways from your report was in the conclusion
21 section, which if you're interested in following
22 along is on Page 38 which you know better than I.

23 So I saw on Page 38 where you say, "My
24 analysis of the historical record leads me to
25 conclude --" sorry, do you see where I'm reading,

1 or should I be more specific?

2 A. I do see.

3 Q. It says, "My analysis of the historical
4 records leads me to conclude that the history of
5 past discrimination against Latinos has led to
6 political disenfranchisement and lack of
7 political representation, which in turn, makes
8 on-going discrimination more likely."

9 Would you say that is also a high level
10 takeaway of your report?

11 A. Yes, I would.

12 Q. And similar to the other conclusions
13 that we discussed, the evidence supporting it is
14 historical from the 20th century?

15 A. Yes, it is primarily from the 20th
16 century.

17 Q. And then in this same paragraph starting
18 at the very bottom of that page on 38 you have a
19 sentence that begins: "In 2021," and it flips
20 over to the next page. It says, "based on my
21 review of the state assembly and senate rolls,"
22 and I don't need to read the whole thing because
23 it's rather long, but you present some numbers of
24 assembly members and state senators and through
25 the end of that paragraph you're discussing the

1 growth in the number of Latinos in the area, and
2 you conclude by saying that, "Latinos make up 18
3 percent of the State's population according to
4 the 2020 census."

5 I'll just let you review those sentences
6 again, rather than me reiterating it out loud,
7 but let me know once you have read those over.

8 A. Okay.

9 Q. Do you also consider this part of, those
10 few sentences part of your expert opinion?

11 A. Yeah, I would say those were
12 observations that anyone could make by looking
13 at, you know, the State legislature and seeing
14 how many Latino Representatives are currently
15 serving, in comparison to the total population of
16 Latinos in the state, uh-huh.

17 Q. So they are observations, rather than
18 expert opinions?

19 MR. FERNANDEZ DEL CASTILLO:
20 Objection, calls for a legal conclusion.

21 A. I'm not sure what the difference would
22 be.

23 Q. (BY MS. CALDWELL) Sure. What expertise
24 did you feel you were relying on to draw that, to
25 draw those conclusions?

1 A. I was simply using my research skills as
2 a scholar to review the representation of Latinos
3 in the State legislature, compared to the total
4 population and the growth of the population in
5 the State of Illinois.

6 Q. So you said before that those were
7 observations that anyone could make. Do you
8 think that they required your experience as a
9 scholar, or were those observations as you said
10 before that anyone could make?

11 A. Well, someone would have to be willing
12 to, you know, be interested in looking at these
13 figures and looking at these numbers to make
14 these observations and some folks might not think
15 of how, you know, proportionally are Latinos
16 represented in the state of Illinois.

17 Q. Sure, but given the figures that you put
18 forward in those sentences, a layperson could
19 draw similar conclusions without your special
20 expertise in 20th century Latino history,
21 wouldn't you agree?

22 A. I suppose that if they took, you know,
23 the time to count up the number of Latino state
24 legislators and looked up, you know, the
25 population, the state, the Latino state

1 population, that they could, you know, come to
2 the same conclusion.

3 Q. And I think what you're saying is that
4 you personally reviewed the State assembly rolls
5 in order to determine whether certain members
6 were Latino or not; is that right?

7 A. Yes.

8 Q. And did that require the use of your
9 expertise in any way?

10 A. I mean it was something that I think,
11 you know, anyone with an interest and, you know,
12 basic education could be able to do.

13 Q. And what did you do to confirm which
14 members were Latino?

15 A. I did this based on surname basically.
16 I looked through the list, and identified some,
17 and there are some that I may have missed, but as
18 far as I can tell, that's how I identified the
19 legislators.

20 Q. Have you double-checked that in any way?

21 A. Did I double-check it?

22 Q. Sure. For instance, when you saw a
23 Hispanic surname, did you Google to make sure
24 that they identified as Latino or was it purely
25 based on surname?

1 A. I think I may have gone to their web
2 page, the State Legislature's site and seen the
3 district that they were in, the geographical area
4 and the names on some of them. I think they have
5 photos perhaps. That's how I confirmed for
6 myself.

7 Q. Okay, and I don't think that information
8 about Latino Senate or Assembly members appears
9 anywhere else in your report; is that right?

10 A. I believe that's correct, yes. Since
11 this was a chronological report, I got to the
12 most recent data or evidence only at the very
13 end.

14 Q. So would that still be characterized as
15 a conclusion or is this more of an additional
16 point?

17 A. No, I would characterize this as a
18 conclusion given that this case is about Latino
19 representation in this state.

20 Q. Okay, and what did you do to ascertain
21 the 18 percent growth rate of the state's
22 population that you cite?

23 A. I looked up census data, the most recent
24 figures, to see how the numbers compared.

25 Q. Did you have to do some math?

1 A. Yes, probably.

2 Q. Is that something that you did or would
3 your research assistant have done that?

4 A. No, that was something I did.

5 Q. And is that generally within your
6 expertise, would you say, as comparing census
7 figures?

8 A. Yes. You know, I use census data in my
9 research, and it's not difficult to, you know,
10 identify population numbers from one day to
11 another, or even in the American Community
12 Surveys in between, and do basic calculations.

13 Q. Is that something that anyone could do,
14 given the census figures, right?

15 A. Perhaps, sure, if they know how to
16 calculate, you know, if they know how to
17 determine percentages, if they are not readily
18 available.

19 Q. Some simple division probably?

20 A. Right.

21 Q. And then so the last two sentences on 39
22 say, "The historical record reveals that Latinos
23 continue to bear the experience of
24 discrimination. As a result, they have voted at
25 lower rates, have not run for office as likely as

1 they might, and have not participated as fully as
2 they could in the political process." I don't
3 see any citations for these statements. Does
4 that look right?

5 A. Correct.

6 Q. Would you say that this opinion applies
7 to the present day?

8 A. Yes, that is correct.

9 Q. Elsewhere in your report is there any
10 citation to information about the current levels
11 of Latino voting?

12 A. Of Latino voting or --

13 Q. Yes, of Latinos who vote.

14 A. No, there's no other reference or
15 citation to information on that.

16 Q. I also think that your report does not
17 contain any figures about how many Latinos ran
18 for office in the most recent elections, right?

19 A. No, it does not.

20 Q. Okay. I'm going to go back a little bit
21 to some of the more specific information in the
22 body of your report. Would you mind turning to
23 Page 36. Let me know when you're there.

24 A. Yes, I'm here.

25 Q. So in that first paragraph you discussed

1 police-related discrimination in the 1990s; does
2 that sound fair to you?

3 A. Yes, correct.

4 Q. And on the last sentence of that first
5 paragraph it says, "All told, Latinos continued
6 to experience prejudice and discrimination at the
7 hands of law enforcement officials in this
8 period." By "this period," you mean the 1990s
9 and early 2000s; is that correct?

10 A. Yes, I believe so.

11 Q. I believe the most recent incident that
12 you cite is 2008, which is in Footnote 91. Does
13 that look right to you?

14 A. Yes, that is correct.

15 Q. Are you familiar with the new laws
16 passed by the general assembly in the last five
17 years that require officers to wear body cameras?

18 A. No, I am not familiar with that.

19 Q. There were also laws passed within that
20 time about requiring officers to record
21 interrogations for certain serious crimes. Are
22 you familiar with those laws?

23 A. No, I am not familiar with those.

24 Q. Okay. Turning to Page 37, if you don't
25 mind that -- I'm sorry, where am I at on this

1 page? Oh, the first sentence of the last
2 paragraph says, "Latinos also brought numerous
3 cases before the Chicago Human -- Chicago
4 Commission on Human Rights alleging employment
5 discrimination against various employers, as well
6 as housing discrimination during the 1990s and
7 2000s."

8 What kind of employers, when you say
9 "employment discrimination," what kind of
10 employers are you referring to here?

11 A. I want to make a correction, it's the
12 Chicago Commission on Human Relations.

13 Q. Oh, I apologize.

14 A. I'll correct that for the record.

15 Q. Thank you.

16 A. What kind of employers? If I remember
17 correctly, they were primarily employers in the
18 service sector.

19 Q. So private companies?

20 A. I believe so, yes, if memory serves.

21 Q. And private employers are not state
22 actors, correct?

23 A. No, but in some cases, they are
24 regulated by the State.

25 Q. But you wouldn't consider employment

1 discrimination by private actors to be
2 State-sponsored, right?

3 A. No, I would not.

4 Q. And I think here you're talking about
5 cases that were brought, but I don't think that
6 your report have any statistics on how many of
7 the cases were actually won by the plaintiffs; is
8 that right?

9 A. That's right. I did not have time to
10 provide analysis of that.

11 Q. Okay. But just to clarify, bringing
12 suit isn't tantamount to an actual violation,
13 right, of any law?

14 A. That's correct, yes.

15 Q. And that sentence also refers to housing
16 discrimination, but it doesn't -- your report, I
17 don't think, specifies whether that was against
18 any public entities; is that right?

19 A. No, I didn't specify who the parties
20 were in the housing discrimination cases.

21 Q. Do you know if there were any public
22 entities involved?

23 A. I cannot recall right now. I do not
24 believe so.

25 Q. And I don't think your report has any

1 statistics about how many of those cases were
2 won.

3 A. No, it does not either.

4 Q. Okay, and similar to before, just
5 confirming that the lawsuits brought here don't
6 prove that there was any legal violations.

7 A. No, they do not. They are simply a
8 reflection of someone filing a Complaint.

9 Q. Right. Are you familiar with the fact
10 that there was a law passed last year aimed at
11 providing housing assistance and protection to
12 low income citizens?

13 A. No, I am not familiar with that law.

14 Q. Okay. Pivoting a little bit, one of the
15 papers mentioned on your resumé that was
16 published May of 2016 was titled, "Latinos --"
17 I'm sorry am I breaking up? My video looks a bit
18 weird. Can you hear me?

19 A. Yes, I can hear you.

20 Q. I'll start over. On your resume there's
21 a paper that you wrote titled "Latinos/AS in the
22 Midwest: A historical overview." Do you recall
23 what paper I'm talking about?

24 A. Yes, I believe so.

25 Q. In that paper you were discussing the

1 late 1960s and early 1970s and you said, "These
2 years cannot be underestimated as a critical
3 moment for the emergence of Latino/a political
4 empowerment in the Midwest." Do you still agree
5 with that statement that you wrote?

6 A. Yes, I would say that was a very
7 important period.

8 Q. You also say I think around kind of in
9 that same discussion that, "Community activists
10 opened the doors to municipal government, higher
11 education and a wide range of professions. I'm
12 sorry, that was a quote beginning at "community
13 activists" and ending at "professions."

14 Do you still agree that activists during
15 the 1960s and '70s opened the doors to municipal
16 government for Latinos?

17 A. Yes. I didn't specify the degree to
18 which they did so, however, I specified that they
19 began to mobilize and make calls for better
20 education and useful government.

21 Q. Okay. Again, I think in that same
22 discussion you went on to express the opinion
23 that Jesus Garcia, the Cook County Commissioner
24 at the time who I believe is now a member of
25 Congress, "eventually made his way to the

1 Legislature, as a number of other Latinos/AS did
2 in the 1980s and 1990s," and another few
3 sentences down you say, "Latinos/AS have been
4 elected to other offices throughout the Midwest,
5 school boards, city councils and State
6 legislatures, as well."

7 You have no reason to disagree with that
8 now, right?

9 A. No, I do not.

10 Q. Okay, great. Going back to your report,
11 and turning to Page 30, if you don't mind, let me
12 know when you're there.

13 A. Yes, I'm there.

14 Q. The first few paragraph starts with,
15 "Decades of white political control of Chicago's
16 City Hall," and that paragraph, going to the
17 bottom of that page I believe it's all referring
18 to the Daley administration. Does that look
19 right to you?

20 A. Yes, I believe so.

21 Q. And I believe you cite here, I just want
22 to confirm that that is cabined to the time
23 period of 1955 to 1976, right?

24 A. You said that that's referring to the
25 period of 1955 to 1976?

1 Q. That this discussion of the Daley
2 administration is limited to the time period of
3 1955 to 1976?

4 A. Yes, correct.

5 Q. And your report on my review doesn't
6 contain any current examples of elected officials
7 prioritizing the needs of white communities in
8 the way that you described Mr. Daley prioritizing
9 them; is that right?

10 A. No, it does not, because I'm a historian
11 so I study, you know, what has occurred in the
12 past, and generally historians do not look at the
13 last -- the most recent two decades of the
14 historical movement.

15 Q. That makes sense, thank you. Then on,
16 let's see, Page 32, and I'm referring to Figure 5
17 that starts on Page 32, but it looks like it
18 rolls over onto Page 33, you have a table of
19 voter registration and turnout that I just want
20 to confirm. The title means that it's referring
21 only to the period of 1975 to 1983, right?

22 A. Yes, that is correct.

23 Q. And I didn't see any updated table for
24 any subsequent years anywhere else in your
25 report; is that right?

1 A. No, there is not.

2 Q. Okay, and nothing on the most recent
3 elections, right?

4 A. No, I do not have any figures on the
5 most recent elections.

6 Q. Okay. Again turning the page if you
7 don't mind to Page 34, starting on the paragraph
8 that starts at the bottom of this page and going
9 over onto Page 35, you discuss the slating
10 process for the judiciary; is that correct?

11 A. Yes, that's correct.

12 Q. The sentence that literally just only
13 the first word of it is on Page 34, and then it
14 turns to Page 35 it says, "The Democratic Party,
15 which controls the majority of the seats on the
16 Cook County bench would use its influence to
17 reward precinct captains, ex-office holders and
18 fundraisers by all but appointing them to bench
19 via the judicial slating process, a process that
20 excluded minority candidates including Latinos."
21 Do you see that?

22 A. Yes.

23 Q. And that sentence is referring to events
24 that occurred in 1988, right?

25 A. Yes, I believe so.

1 Q. And then the next two sentences, the one
2 that begins, "In short judicial elections," and
3 then the second sentence that rounds out the
4 paragraph, "that dynamic excludes Latinos," I
5 believe those are referring to House Speaker
6 Madigan; is that right?

7 A. Yes, I believe so.

8 Q. Former House Speaker Madigan, excuse me.
9 And there are no more recent sources in this
10 paragraph, right?

11 A. No, not in that paragraph.

12 Q. Okay. I actually, I don't think there
13 are any more recent sources on judicial slating
14 anywhere in your report but --

15 A. No, there are not.

16 Q. Okay, and nothing about the current
17 state of the judiciary, correct --

18 A. No, there's not.

19 Q. -- or how many members of the judiciary
20 are Latino?

21 A. No, there are not, no, they are not in
22 this report.

23 Q. Did you do any research on that for the
24 report that didn't make it in?

25 A. No, there is not.

1 Q. Do you know how many -- oh, I'm sorry,
2 continue your sentence.

3 A. No, I just corrected myself. I said no,
4 I did not.

5 Q. Oh, okay. Do you know how many Latino
6 judges there are on the bench in Cook County?

7 A. I've seen the figure. I do not recall
8 it right now, but it is -- it can -- I believe it
9 currently continues to under-represent the
10 portion of the Latino population in Cook County.

11 It continues to be -- I'm sorry, I'm
12 blanking right now. The number continues to
13 be -- under-represent the proportion of Latinos
14 in the county's population.

15 Q. Whatever that number is, though, it
16 doesn't appear in your report, right?

17 A. No, it does not.

18 Q. And that's not one of the opinions
19 you're offering in this case, right, because it's
20 not in your report?

21 A. No, it is not.

22 Q. Are you aware that in October of this
23 year, 4 of the 22 new associate judges who were
24 elected in Cook County to the Cook County
25 judiciary were Latinos?

1 A. I believe I saw in Professor Lichtman's
2 report that he may have mentioned the candidates.

3 Q. I don't think he mentioned the
4 judiciary. I was just asking if you were just
5 more generally familiar with the fact that 4 of
6 the 22 new judges in Cook County were Latinos.

7 A. No, I was not familiar with that.

8 Q. And are you familiar with Ruth Gudino,
9 who was also a few days after that, sworn in as a
10 fifth Latino judge appointed to a Countywide
11 vacancy this past October?

12 A. No, I was not familiar with that.

13 Q. Your report I think focuses on judicial
14 slating. It doesn't talk about slating for any
15 political positions, right?

16 A. No, I don't believe it does.

17 Q. And then I think the figures that you
18 might have been thinking of were, that I believe
19 appear in Dr. Lichtman's report, was that in 2020
20 the Democratic primary endorsed four Latinos for
21 Cook County Countywide positions, are you aware
22 of that?

23 A. Yes, I believe that's what I was
24 referring to.

25 Q. Okay, and that was out of 21 positions,

1 so that's about one in five, right?

2 A. Yes.

3 Q. Is that right?

4 A. That's correct.

5 Q. Okay. On Page 36 of your report you
6 quote a Chicago Tribune article and I'm referring
7 to the sentence that says, it's towards the
8 bottom of the text on Page 36, it says, "The
9 article noted, "such strategies were unlikely to
10 be used in a city like Chicago, where Hispanics
11 have more political leverage."

12 Do you agree with this quote that you
13 included in your report?

14 A. I was simply making the observation
15 here, what the article stated, and including it
16 for -- as a point of reference.

17 Q. Okay. So do you disagree with that
18 statement that Hispanics have more political
19 leverage in Chicago?

20 A. No, I would not say that I disagree with
21 it necessarily.

22 Q. Do you agree with it?

23 A. I would say that Hispanics probably do
24 have more political leverage in Chicago where
25 they are more concentrated as a population and

1 have more political representatives.

2 Q. And we could say more political leverage
3 in Chicago as compared to other places in
4 Illinois, right?

5 A. Yes, yes, that's the comparison.

6 Q. Great, I just wanted to clarify. Thank
7 you. On Page 37, turning the page again, let's
8 see towards -- again, towards the bottom of the
9 page in the last paragraph, the second to the
10 last sentence you say that, "Latino political
11 representation has lagged historically."

12 I'm wondering how your citation there to
13 American Community Survey data and Census Bureau
14 data supports that point.

15 A. Basically what I was highlighting here
16 was that when Latinos constitute X percentage of
17 a County or, you know, a municipality, that their
18 political representation numbers -- that their
19 political representation numbers do not comport
20 with that or keep up with that.

21 Q. Okay, but there is no -- the American
22 Community Survey data and the Census Bureau data
23 those don't illustrate how many Latinos ran for
24 office in any of the relevant locales, right?

25 A. No, they do not. They simply provide

1 population data.

2 Q. I don't think you provide those
3 statistics elsewhere, right, about how many
4 Latinos ran for office in any of the places you
5 named here, Cook County, Kane County and Lake
6 County?

7 A. No, I did not.

8 Q. Or any information about how likely a
9 Latino candidate is to be successful in their run
10 for office?

11 A. No, I do not provide that.

12 Q. Okay, and there is also no information
13 in your report I don't think about the relative
14 success rate of white candidates compared to
15 Latino candidates, right?

16 A. No, there is not.

17 Q. Turning the page again, just moving
18 through trying to make it a little easier to flip
19 a few more pages at a time, on Page 38 you have
20 Figure 6 here, and I just want to confirm that I
21 think this figure is supported by the same data
22 we were just discussing in Footnote 97; is that
23 right?

24 A. Yes, it is. That's exactly where it
25 comes from.

1 Q. Okay, and how did you use the 2016
2 American Community Survey data in creating this
3 table?

4 A. Actually, no. That document may not
5 have been -- that may not have informed this
6 table.

7 Q. Okay.

8 A. The 2010, this table was based on the
9 2010 and 2020 census data.

10 Q. Okay, is -- what was the 2016 American
11 Community Survey data used to support?

12 A. I'm not sure. I believe that I may have
13 looked at it first before I was able to access
14 the 2020 census data, so it was a preliminary
15 source.

16 Q. So are there any figures in here that
17 exclusively rely on the community survey data as
18 opposed to census data, official census data,
19 I'll say?

20 A. Not that I recall at the moment.

21 Q. Okay. Do you frequently use American
22 Community Survey data in your work?

23 A. Yes, yes, I will look at it,
24 particularly when the next decade's census data
25 is not yet available.

1 So I perhaps looked at the 2016 American
2 Community Survey to see their estimates and then
3 confirm whether those estimates, you know, were
4 accurate or not based on the 2020 census data.

5 Q. Okay. Do you generally find the
6 American Community Survey data to be reliable?

7 A. From what I can tell, it seems to be
8 very reliable.

9 Q. Okay. Going back to the chart, Figure
10 6, this chart looks like it represents the
11 population at different times in Cook County,
12 right?

13 A. Correct.

14 Q. And its total population is the metric,
15 right?

16 A. The first numbers offered in the table,
17 yes, are the total population.

18 Q. And then the non-Hispanic and Hispanic
19 rows are subsets of that total population, right,
20 so they still relate back to the total
21 population?

22 A. Yes, that is correct.

23 Q. So total population here is not limited
24 to voting age population, right?

25 A. No, it is not.

1 Q. And it's also, total population is also
2 different from citizen voting age population,
3 right?

4 A. That is correct.

5 Q. Do you know if total population data is
6 relevant to redistricting decisions?

7 MR. FERNANDEZ DEL CASTILLO:
8 Objection to form.

9 A. I do not know if it's relevant to
10 redistricting; however, I would assume that
11 considering the entire population in the region,
12 including those who are not yet eligible to vote,
13 such as persons under the age of 18, would be
14 relevant in the policies that political leaders
15 might make that would affect people going forward
16 in the future.

17 Q. (BY MS. CALDWELL) Okay, but you're not
18 familiar specifically with whether election law
19 or redistricting generally focuses on total
20 population, as opposed to other population
21 figures?

22 A. No, I am not, no.

23 Q. Is there a reason why you chose to
24 include total population in your report instead
25 of one of the other population figures that I

1 mentioned, like voting age, or citizen voting age
2 population?

3 A. Yes, because I'm not an expert in
4 elections and voting, so I would more generally
5 use total population data from the census or
6 other sources in measuring a population.

7 Q. Okay. Are you offering any opinion
8 about whether the total population data should be
9 used in redistricting decisions?

10 A. I'm suggesting that it should be taken
11 into consideration, I guess.

12 Q. Do you know, is that anywhere explicitly
13 in your report or is that just by the inclusion
14 of this figure?

15 A. I do not believe I note that anywhere
16 else in this report.

17 Q. Okay. So that's not -- that specific
18 opinion that you're offering to support
19 Plaintiffs' case here, the total -- you're not
20 saying that total population should be used over
21 other population figures in redistricting
22 decisions?

23 A. No, not necessarily.

24 Q. Okay, and you say right above the chart
25 kind of introducing it, you say there I think

1 you're referring to Latinos' lack of political
2 representation will most likely perpetuate those
3 inequalities, and by those inequalities I think
4 you mean the inequalities that Latinos face as
5 you've discussed in your report, but you can let
6 me know if that's an unfair characterization of
7 that sentence.

8 A. That's a fair characterization.

9 Q. Okay. So are you, sort of through the
10 introduction of the table with that sentence, are
11 you offering an opinion that Latinos lack
12 political representation, if the representation
13 does not mirror total population numbers?

14 MR. FERNANDEZ DEL CASTILLO:
15 Objection to form.

16 A. Could you repeat the question?

17 Q. (BY MS. CALDWELL) Sure. I'll rephrase
18 it, too. You're not offering an opinion that
19 Latinos lack political representation if their
20 representation does not mirror total population
21 numbers, right?

22 A. Am I not offering that opinion? Is that
23 what you're stating? No, I'm not offering that
24 opinion.

25 Q. Okay, and you cited two articles in

1 Footnote 98 that I tried to take a look at, but
2 they are both very long. I was wondering if you
3 have pin sites for either of them.

4 The first article is the Jose Miguel
5 Acosta-Cordova article, and that was about 172
6 pages long, and so I'm wondering if you have a
7 pin site for what you're using to support that
8 last sentence there that we just discussed there.

9 A. Pin site? What do you mean by that,
10 like a particular paper reference?

11 Q. I'm sorry, yeah, maybe that's a legal
12 word, yeah, a specific page or page range.

13 A. No. I would have to go back to those
14 reports to review them to see what legal data is
15 referred to.

16 Q. Okay. Do you remember what point that
17 article made specifically that supports the
18 sentence that's quoted after?

19 A. No, these are not -- those two citations
20 in the articles, they are reports, like policy
21 reports that were produced out of the -- I think
22 the Great Cities Institute and the Institute For
23 Research on Race and Public Policy at USC.

24 Q. Okay. So you can't recall the details
25 of what you were referring to when you cited that

1 article, what was in the article that you were
2 referring to?

3 A. They included a number of tables or
4 figures with demographic data, and that's what I
5 would have been referring to.

6 Q. Okay.

7 A. And could I ask if it would be possible
8 to have a break in the near future?

9 Q. Oh, sure. I'll just finish a couple
10 more questions, if that's all right with you --

11 A. Sure.

12 Q. -- just so we can not come back to the
13 same topic, and the same goes for the second
14 source.

15 Was there also demographic data in that
16 second source that you're referring to?

17 A. Yes, that second source did have
18 demographic data.

19 Q. Okay, great, and that's what you would
20 have been citing it for?

21 A. Yes, correct.

22 Q. Okay. Was there -- do you have any
23 other basis for your opinion in that sentence
24 before Footnote 98?

25 A. Do I have any other basis for that

1 opinion? I would say just all the general
2 information that, you know, I may come across or
3 be aware that's, you know, relevant to this
4 moment might inform that.

5 Q. So was that the other information that's
6 also in the report?

7 A. Yes, it would be possibly information in
8 the report.

9 Q. Okay, and then just quickly, Figure 6 is
10 just referring to Cook County, right?

11 A. That is correct.

12 Q. Are you offering the opinion that
13 statewide political representation should reflect
14 the racial makeup of Cook County specifically,
15 rather than the racial makeup of the state
16 overall?

17 A. No, I am not. I am suggesting -- I am
18 simply using Cook County as an example here, but
19 in other counties we can see similar, I think
20 that, you know, we would have to look at their
21 data, as well.

22 Q. Okay, so the answer to my question, are
23 you offering an opinion that State political
24 representation should reflect the racial makeup
25 of Cook County, your answer was no, right?

1 A. Correct.

2 Q. And I think you -- I think we discussed
3 earlier, but tell me if I'm wrong that the
4 percentage of the population in Cook County that
5 is Latino is higher than the Latino population
6 statewide, right?

7 A. I don't remember you mentioning that,
8 but I believe that is true, yes.

9 Q. And I think it came up in the context of
10 the increased political power of Latinos in
11 Chicago because there's a larger population, but
12 I'm not trying to mischaracterize anything, so my
13 apologies if I was.

14 Do you know what percentage of the
15 statewide population is Latino?

16 A. I believe it is about 17 percent, if I'm
17 not mistaken, between 17 and 21 at this time.

18 Q. But that's not cited in your report,
19 though, right?

20 A. No, I do not think so.

21 Q. And Dr. Lichtman in his report says that
22 the citizen voting age population, which as we
23 discussed I understand is different than
24 political population, but the citizen voting age
25 population is 11.2 percent Hispanic. Do you have

1 any reason to disagree with that?

2 A. I haven't seen those figures myself, but
3 if that's what he's reporting, then I assume that
4 he's, you know, using reliable sources.

5 Q. Okay, we can take a quick break now.
6 Would 5 minutes be all right? I'm just --
7 actually we can do 10. I actually don't have too
8 much else, so I was trying to go quickly so that
9 we don't run into the hearing later, but I think
10 we'll be fine, so is 10 minutes good for everyone
11 for a break?

12 MR. FERNANDEZ DEL CASTILLO: Do you
13 care, Dr. Fernandez?

14 THE WITNESS: That's fine with me.

15 MS. CALDWELL: Okay, let's go off
16 the record and we'll come back let's just say at
17 11:20. Thank you.

18 (Recess)

19 Q. (BY MS. CALDWELL) All right, so we
20 already discussed it, so I don't want to harp on
21 it too much, but if you don't mind going back to
22 Page 39 and those few sentences at the top of the
23 page where you discuss, you know, the numbers of
24 Latino State Senators and Assembly Members, and
25 the representation compared to the census, if you

1 have that in front of you.

2 A. Yes, I do.

3 Q. Okay, and you said already I think we
4 discussed that you personally determined which
5 members were Latino, right?

6 A. Yes, I did, based on surnames.

7 Q. And again, I don't want to
8 mischaracterize anything, but is it right, I
9 think you said you also looked up their names and
10 which districts they represented possibly on
11 Google or something?

12 A. I looked them up in the -- through my
13 State Legislature's website, uh-huh.

14 Q. Do you happen to remember which
15 districts the Latino Senators or Assembly Members
16 represented?

17 A. I don't remember all of them. I know
18 some of them included parts of Chicago, yeah.

19 Q. Okay. Are you aware that plaintiffs
20 challenge only two Senate districts in this case?

21 A. I'm sorry, can you state that again?

22 Q. Are you aware that plaintiffs challenged
23 two Senate districts in this case?

24 A. No, I was not aware of that.

25 Q. Okay. So you weren't aware that they

1 are both currently represented by Latinos, right?

2 A. No, I was not.

3 Q. Did you happen to review the Declaration
4 submitted by the defendants from Senator
5 Villanueva, who was one of those senators?

6 A. No, I did not.

7 Q. Okay. If you don't mind me reading just
8 a few short sentences from Senator Villanueva's
9 Declaration, "As a Latino Senator it was
10 incredibly important to me that the entire map
11 maximized Latinos to participate in the process
12 and elect the candidates of their choice."

13 She next says, which this is the
14 sentence that I would like to focus on, "In my
15 opinion, determining whether the map has
16 maximized opportunities for Latinos to elect the
17 candidates of their choice does not solely
18 require examining the demographics or the
19 political indexes of areas, but also requires a
20 real life understanding of the political dynamics
21 of communities." Do you have any --

22 MR. FERNANDEZ DEL CASTILLO:
23 Sheridan, would you be able to screen share and
24 allow Dr. Fernandez to review the document?

25 Q. (BY MS. CALDWELL) Do you feel that you

1 need to see that sentence in writing,
2 Dr. Fernandez, or are you able to respond to a
3 quick question based on what I just read?

4 A. It would be helpful if you could share
5 that.

6 Q. Okay. I was just trying to save
7 everyone time here by not doing it, but I can
8 pull it up if it's simpler.

9 A. If you could, I would appreciate it.

10 Q. Sure, and this is on Page 8 of her
11 report, if it matters to you, Mr. Fernandez, for
12 your own notes.

13 MR. FERNANDEZ DEL CASTILLO: I
14 don't have that one. Thanks.

15 Q. (BY MS. CALDWELL) I'm sorry, I'm trying
16 to figure out how to make it bigger so that when
17 I put it in my screen you'll be able to see it.

18 Okay. Without sharing my whole screen,
19 I am just sharing the Villanueva Declaration?

20 A. The screen was black. I didn't see
21 anything on it.

22 Q. Oh. Okay, do you see it now?

23 A. Yes, I do.

24 Q. Sorry about that. I wasn't planning on
25 putting anything up. Okay, so the sentence that

1 I was focusing in on, I'm not sure if you can see
2 my mouse, but it starts here.

3 A. Yes.

4 Q. "In my opinion, determining whether the
5 map has maximized opportunities for Latinos to
6 elect the candidates of their choice does not
7 solely require examining the demographics or the
8 political indexes of areas, but also requires a
9 real life understanding of the political dynamics
10 of communities."

11 Do you have any reason to disagree with
12 that sentence, from your own perspective,
13 obviously?

14 A. I'm just reading it again.

15 Q. Uh-huh, take your time.

16 A. I would not have any reason to,
17 specifically.

18 Q. And are you familiar with the Little
19 Village area of Chicago?

20 A. Yes, I am.

21 Q. Okay. That's the area that Senator
22 Villanueva represents, and she also writes in her
23 report in this Paragraph 20 right there, this
24 sentence, she says, "A legislative map that
25 divides Little Village into multiple districts,

1 including those with more moderate or
2 conservative ideologies will fracture the
3 political cohesion that currently exists and
4 reverse many of the significant political
5 advances made by local Latinx leaders and
6 politicians."

7 Do you have any opinion about that
8 sentence or any reason to disagree with it?

9 A. I don't know that I would agree or
10 disagree with it. I'm not sure what to make of
11 it.

12 Q. Okay. Do you think any of the opinions
13 expressed in your report conflict with that?

14 A. I'm not sure.

15 Q. Okay, that's fine. I know you didn't
16 review the report, and that's fine. Okay, I'm
17 just going to stop my screen sharing and go back
18 to normal now. Do you just see the normal Zoom
19 now, and not my screen?

20 A. Yes, you're back in view with the rest
21 of us.

22 Q. Okay, great. Okay, and again you said
23 you don't know specifically which districts
24 plaintiffs challenged in this case, right?

25 A. No, I do not.

1 Q. Do you know if all of the districts that
2 they challenged are in Cook County?

3 A. Do I know that all of them are in Cook
4 County, you said?

5 Q. Right.

6 A. No, I am not sure.

7 Q. Is there a reason why you chose to focus
8 on Cook County demographics and background in
9 your report?

10 A. Yes. I'm sorry, go ahead, you can
11 finish your question.

12 Q. I'm sorry, I was trailing. I said
13 without that information, is there a reason why
14 you chose to focus on Cook County?

15 A. Yes, because that is where the Latino
16 population is concentrated in the State of
17 Illinois so that -- you know, that's the biggest
18 center of population.

19 Q. Okay. Changing topic a little bit, your
20 report didn't provide any information about the
21 current state of Democratic access to the polls
22 in Illinois, right?

23 A. No, it did not.

24 Q. Is there any reason that you chose not
25 to include up-to-date information about that?

1 A. I didn't include any information on
2 that, because it's beyond of the scope of my, you
3 know, historical knowledge and research.

4 Q. Okay. So none of your research touched
5 on voting policies about or policies about voting
6 access in Illinois?

7 A. In the present, no.

8 Q. Okay. Are you aware that in 2005 the
9 Illinois Legislature authorized early voting?

10 A. No, I was not aware of that.

11 Q. And that in 2014 the Legislature
12 authorized Election Day same-day voter
13 registration?

14 A. No, I was not aware of that.

15 Q. And that they eliminated the
16 identification requirement for early voting also
17 in 2014?

18 A. No, I was not aware of that.

19 Q. And then are you aware that in 2018 the
20 Legislature authorized automatic voter
21 registration through State agencies?

22 A. No, I was not aware of that.

23 Q. And that in 2021 they, also the same
24 Legislature who enacted this redistricting map,
25 authorized a permanent vote by mail status, so

1 that voters can receive their ballots by mail
2 every election?

3 A. No, I was not aware of that.

4 Q. And they also in that same bill in 2021
5 established Election Day as a State and school
6 holiday?

7 A. No, I was not aware of that.

8 Q. And this is mentioned in Dr. Lichtman's
9 report, I'm not sure if it's a part that you
10 read, that in 2020 Illinois was rated the 4th
11 best state in terms of Democratic access?

12 A. No, I don't believe -- or I don't
13 remember coming across that in my review, no.

14 Q. Okay, and if you don't mind I might take
15 a few more minutes just to review my notes but I
16 think we might be able to wrap up. I just want
17 to make sure that there's nothing I missed, if
18 that's all right with everybody?

19 MR. FERNANDEZ DEL CASTILLO: Just
20 an FYI, I am likely going to have just a few
21 follow-up questions for Dr. Fernandez.

22 MS. CALDWELL: Sure, that's fine.

23 MR. FERNANDEZ DEL CASTILLO: I
24 promise to be quick.

25 MS. CALDWELL: No, that's fine, I'm

1 just cognizant of the hearing, but we're early,
2 so we're good I think.

3 Okay, yeah, I'll just go off the video
4 for just a few minutes. I'll be back by 11:40.

5 (Recess)

6 MS. CALDWELL: I think that I can
7 spare Dr. Fernandez any further questioning, so
8 I'll go ahead and let you ask whatever you would
9 like, Mr. Fernandez.

10 EXAMINATION

11 BY FERNANDEZ DEL CASTILLO:

12 Q. Thank you, Counsel. I'm not going to
13 keep you here much longer, Dr. Fernandez, but I
14 think we're all very grateful for your time.
15 Dr. Fernandez, where were you educated?

16 A. Do you mean my college education?

17 Q. Everything.

18 A. I went to college at Harvard University.
19 I did a Master's Degree at the University of
20 Illinois Urbana-Champaign, and then I got a
21 second Master's Degree at the University of
22 California-San Diego, where I also obtained my
23 Ph.D.

24 Q. Those are all wonderful schools, and
25 when you were at those three great places what

1 did you study?

2 A. I studied government. I was a double
3 major as an undergraduate, which is similar to
4 political science. At Urbana-Champaign I studied
5 educational policy, and at UC-San Diego I studied
6 ethnic studies, with a focus in history.

7 Q. So this perhaps goes without saying but
8 would you say it is fair to say that with your
9 expertise in history, you are a historian?

10 A. Yes.

11 Q. So I'm going to ask you some questions
12 about history and I'm going to start with some
13 relatively recent events. In your report you
14 mentioned an ad by Jim Oberweis; is that correct?

15 A. Yes, that's correct.

16 Q. Why did you mention that ad?

17 A. That may have been included in one of
18 the drafts that went back and forth with counsel.
19 I'm trying to find where it is, but I believe the
20 ad refers to, here it is, Page 35, anti-immigrant
21 sentiment that political ads often include.

22 Q. So as you say in your report and I'll
23 represent to you that political ad happened in
24 2004, do you think it's irrelevant to the present
25 day, just because it happened in 2004?

1 A. No, not at all. I believe that the
2 Latino phobia and Nativism expressed in those
3 kinds of political ads even in 2004 are still
4 relevant today.

5 Q. In your report you also mentioned the
6 Division Street uprising. What was that?

7 A. That was several days of violence in the
8 streets around Division Street in Chicago in
9 1966, I believe, and that was in reaction to a
10 response to the police shooting of a Puerto Rican
11 young man in the Humboldt Park community.

12 Q. Do you think that event is not relevant
13 to the present day Latino experience?

14 A. No, I would say that it is.

15 MS. CALDWELL: Sorry, I just want
16 to object to the extent that any of this is
17 adding further opinions that are not in
18 Dr. Fernandez's report.

19 I understand you're asking about events
20 in her report, but if she's adding new commentary
21 about it that's supplementing her expert report,
22 I think that's outside of the scope, so I just
23 want to put that on the record.

24 MR. FERNANDEZ DEL CASTILLO: Fair
25 enough. I'll ask the question again.

1 MS. CALDWELL: I'm sorry to
2 interrupt you, Dr. Fernandez.

3 A. I'm sorry, I couldn't hear you.

4 Q. (BY MR. FERNANDEZ DEL CASTILLO) I said
5 I'm just going to ask the question again just to
6 get it back on the record and to remind you what
7 I was saying. Do you think those events do not
8 affect the present day Latino experience?

9 A. Well, I would say that they do. They
10 are relevant in the sense that police brutality
11 and violence against Latinos continues to be an
12 issue in our current moment, and that the
13 concerns, the community concerns that were
14 expressed at that time in that form,
15 many continue to be relevant today.

16 Q. In your report, you also mentioned the
17 Bracero Program. Could you tell me what that is?

18 A. Yes, the Bracero Program was a
19 binational agreement between the United States
20 and Mexico drawn up during World War II and
21 respected at various times by Congress in
22 subsequent years, and it was designed to recruit
23 Mexican workers for temporary labor assignments
24 in the U.S. from roughly 1942 to 1964, I believe.

25 Q. In your opinion as a historian does the

1 Bracero Program represent fair treatment of the
2 Latino community?

3 A. No, it does not. I would say that the
4 Bracero program was, in fact, a stain on the
5 history of U.S./Mexico relations and on the
6 history of Mexican Americans in the U.S. It
7 was -- it was a program that had a lot of
8 problems.

9 Q. Are there people alive today who were a
10 part of or were affected by that program?

11 A. Yes. There may still be former workers
12 themselves or their families who are still alive
13 today.

14 Q. So in your report you also discussed the
15 19th century. You say that in the 19th century
16 citizenship was based on race and limited to
17 white people. Why do you say that in your
18 report?

19 A. Because it was important to clarify that
20 although Mexican Americans were granted U.S.
21 citizenship through the treaty of Guadalupe
22 Hidalgo of 1848, that the racial requirements
23 attached to citizenship at that time were not
24 necessarily applied fully to the Mexican
25 population that remain in the U.S.

1 Q. Now I know that was a long time ago, but
2 do you think laws tying citizenship to race are
3 relevant to the present day Latino experience?

4 A. Yes, certainly, you know, laws that have
5 tied race to citizenship continue to be relevant
6 for many groups in the U.S. I would say.

7 Q. And finally I would just ask this, in
8 your professional opinion as a historian, do you
9 think that the -- that history is not relevant to
10 our current experience?

11 A. No, I would not say that. I would say
12 that history is absolutely relevant to the
13 current moment and it informs, you know,
14 socioeconomic conditions, it informs society, it
15 informs politics, and who we are as human beings
16 as people more generally.

17 Q. Thank you, Dr. Fernandez. I have no
18 further questions.

19 MR. ARMSTRONG: Hold on. Go ahead.
20 Sheridan. We just have a couple of questions.
21 Do you want me to go now Sheridan, or do you have
22 any more?

23 MS. CALDWELL: Sure, no, go for it.

24 EXAMINATION

25 BY MR. ARMSTRONG:

1 Q. Can you put the Declaration of Senator
2 Villanueva back up on the screen share?

3 MS. CALDWELL: Sure. Do you have a
4 page in mind?

5 MR. ARMSTRONG: The same one that
6 you asked questions about, I think it was -- I
7 think you said it was Page 8.

8 MS. CALDWELL: Okay. Okay, this is
9 the top of Page 8 up here.

10 MR. ARMSTRONG: Yeah, it was
11 Paragraph 22, right the top of Page 8.

12 Q. (BY MR. ARMSTRONG) Dr. Fernandez, my
13 name is Brian Armstrong. I am one of the
14 attorneys for the plaintiffs in the companion
15 case that we call the parties the McConchie
16 plaintiffs, and they like, Maldef have also
17 challenged the redistricting map.

18 I just want to bring you back to this
19 Declaration of Senator Villanueva. You were
20 asked some questions about her Declaration and
21 her opinion about the map. Do you recall that
22 discussion generally?

23 A. Do you mean here in this deposition?
24 Yes.

25 Q. Yeah, here today, that Ms. Caldwell ask

1 asked you questions about.

2 A. Yes.

3 Q. And in particular, she asked you
4 questions about the sentence in Paragraph 22 of
5 the Villanueva Declaration that says: "In my
6 opinion determining whether the map has maximized
7 opportunities for Latinos to elect the candidates
8 of their choice does not solely require examining
9 the demographics or the political indexes of
10 areas, but also requires a real life
11 understanding of the political dynamics of the
12 communities."

13 Do you remember answering some questions
14 from Ms. Caldwell about that sentence?

15 A. Right.

16 Q. Now you do not know Senator Villanueva,
17 do you?

18 A. No, I do not.

19 Q. Do you know anything about her?

20 A. No, I do not.

21 Q. And you are not aware of the basis that
22 Senator Villanueva relied on to make that
23 statement, are you?

24 A. The basis on which what? I'm sorry, I
25 could not hear you.

1 Q. You are not aware of the basis on which
2 Senator Villanueva made that statement, are you?

3 A. No, I am not.

4 Q. And, in fact, the very first clause of
5 the sentence says, "In my opinion," so she's
6 expressing an opinion, and not a fact, correct?

7 A. That is correct.

8 Q. Okay, and you neither agree nor disagree
9 with that opinion; is that correct?

10 A. I would be -- yeah, I would not -- I
11 would need to know more to be able to have an
12 opinion on this.

13 Q. Okay. So if you did some more, some
14 further research into the matter, it might turn
15 out that you disagree with that opinion, correct?

16 A. That's possible, yes.

17 Q. Those are all the questions I have.

18 MS. CALDWELL: Can I stop the
19 screen share?

20 MR. ARMSTRONG: Yes.

21 MS. CALDWELL: Okay. Is there
22 anything else? I think that would be exciting
23 that we actually get a lunch break before the
24 hearing.

25 Okay, hearing nobody else coming

1 forward, okay. Thank you so much for being here,
2 Dr. Fernandez, I know especially this case has
3 been a whirlwind and was probably an interesting
4 first expert experience for you, so thank you for
5 being a sport and being here today.

6 THE WITNESS: Thank you.

7 THE REPORTER: I understand that
8 this is a rush for both sides here, right?

9 MR. FERNANDEZ DEL CASTILLO: Yes.
10 I can't guarantee how quickly and when that's
11 going to happen, but yes, and I do want to
12 mention that our paralegal has reached out to you
13 about some of the logistical details, and I have
14 been told to not speak about them, so I won't.

15 THE REPORTER: Thank you all.

16 (Deposition ended at 11:56 a.m.)
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C E R T I F I C A T E

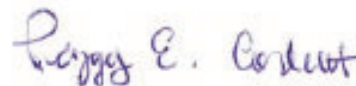
I, Peggy E. Corbett, a Certified Court Reporter of the State of Missouri, do hereby certify:

That prior to being examined the witness was by me duly sworn;

That said deposition was taken down by me in shorthand at the time and place hereinbefore stated and was thereafter reduced to writing under my direction;

That I am not a relative or employee or attorney or counsel of any of the parties, or a relative or employee of such attorney or counsel, or financially interested in the action.

WITNESS my hand and seal this 4th day of December, 2021.



PEGGY E. CORBETT,
CCR No. 143, RDR, CRR

Francisco Fernandez-Del Castillo, Esq.

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December 6, 2021

RE: CONTRERAS vs. ILLINOIS STATE BOARD OF ELECTIONS

December 3, 2021, LILIA FERNANDEZ, JOB NO. 4970010

The above-referenced transcript has been completed by Veritext Legal Solutions and review of the transcript is being handled as follows:

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___ Waiving the CA Code of Civil Procedure per Stipulation of Counsel - Original transcript to be released for signature as determined at the deposition.

___ Signature Waived - Reading & Signature was waived at the time of the deposition.

Page 99

1 _x_ Federal R&S Requested (FRCP 30(e)(1)(B)) - Locked .PDF

2 Transcript - The witness should review the transcript and
3 make any necessary corrections on the errata pages included
4 below, notating the page and line number of the corrections.
5 The witness should then sign and date the errata and penalty
6 of perjury pages and return the completed pages to all
7 appearing counsel within the period of time determined at
8 the deposition or provided by the Federal Rules.

9 ___ Federal R&S Not Requested - Reading & Signature was not
10 requested before the completion of the deposition.

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0	1980s 28:20 61:2	28 1:9	60625 3:12
08845 2:4	1983 62:21	2nd 20:25 21:6	629-2512 2:11
1	1988 63:24	3	630.760.4601 3:3
1 4:2 19:7,12 21:16 38:14 100:1	1990s 56:1,8 57:6 61:2	3 99:5	643 2:9
10 17:9 34:12,15 79:7,10	19th 92:15,15	30 61:11 100:1	7
105 3:2	1:21 1:5	312 2:15	700 2:14
106 3:11	2	312.802.0336 3:7	70s 60:15
10th 19:18,23	2 20:4 38:17	3139 1:5	8
11 2:14	20 83:23	32 62:16,17	8 82:10 94:7,9,11
11.2 78:25	2000 3:18	33 62:18	815.762.2629 3:12
1100 2:10	2000s 56:9 57:7	34 63:7,13	88 3:23
11:20 79:17	2004 89:24,25 90:3	35 63:9,14 89:20	8th 20:5,6,19
11:40 88:4	2005 86:8	36 55:23 67:5,8	9
11:56 97:16	2006 26:18	37 56:24 68:7	90014 2:10
139 9:19,21 42:4 42:10	2008 56:12	38 48:22,23 49:18 69:19	91 56:12
141 3:11	2010 70:8,9	39 54:21 79:22	93 3:23
143 98:20	2014 86:11,17	3rd 1:25	94111 3:19
1600 3:6	2016 26:14 59:16 70:1,10 71:1	4	97 69:22
161 3:6	2018 86:19	4 65:23 66:5	98 3:24 75:1 76:24
17 78:16,17	2020 2:2 50:4 66:19 70:9,14 71:4 87:10	415.391.0600 3:19	9:00 5:1
172 75:5	2021 2:1 19:18,23 20:6,19,25 49:19 86:23 87:4 98:17 99:3,5	427-0701 2:15	a
18 50:2 53:21 72:13	2025.520 99:9,12	4970010 99:5 101:2	a.m. 5:1 97:16
1848 92:22	20th 21:19 22:5,7 36:8 47:22 49:14 49:15 51:20	4th 87:10 98:16	ability 38:20 44:2 47:6
19 4:2	21 66:25 78:17	5	able 5:16 6:2 7:10 36:1 41:10 52:12 70:13 81:23 82:2 82:17 87:16 96:11
1942 91:24	213 2:11	5 3:22 34:11 37:20 37:21 38:3,11,16 62:16 79:6	abraham 1:3
1950s 28:19	21st 22:2,5 27:21 47:19	505 3:18	absolutely 18:18 93:12
1955 61:23,25 62:3	22 65:23 66:6 94:11 95:4	57 2:1	access 39:7 70:13 85:21 86:6 87:11
1960s 60:1,15		6	accurate 5:16 6:1 71:4
1964 91:24		6 4:3 17:9 69:20 71:10 77:9 99:3	acosta 75:5
1966 90:9		60 17:11	
1970s 60:1		60143 3:3	
1975 62:21			

[act - back]

act 38:17 acted 29:21 action 98:15 activists 60:9,13 60:14 actors 57:22 58:1 actual 20:13,17 21:7 32:19 42:11 58:12 ad 89:14,16,20,23 adams 2:14 add 31:16 36:6 37:22 added 13:23 36:9 adding 90:17,20 additional 13:24 14:24 18:20 31:12 33:10,22 34:2 53:15 additions 30:8 administration 61:18 62:2 admit 9:5 ads 89:21 90:3 advance 13:13 19:24 advances 84:5 advised 37:12 affect 72:15 91:8 affiliated 29:10,13 29:16 affiliation 26:25 age 71:24 72:2,13 73:1,1 78:22,24 agencies 86:21 ago 93:1 agree 51:21 60:4 60:14 67:12,22 84:9 96:8 agreement 91:19	ahead 7:14 23:14 33:2 34:13,15 85:10 88:8 93:19 aimed 59:10 alive 92:9,12 alleging 57:4 alliances 29:2 allow 81:24 allowed 36:4 alter 32:21 alternative 9:24 20:15 42:15 amending 32:5 american 2:7 54:11 68:13,21 70:2,10,21 71:1,6 americans 92:6,20 analysis 48:24 49:3 58:10 analyze 11:13 angeles 2:10 anna 2:21 annotated 10:6 answer 6:4 7:12 7:20,21 8:1 23:15 23:17,24 37:2 77:22,25 answering 95:13 answers 6:9,17 anti 89:20 anybody 16:17 apologies 78:13 apologize 23:8 32:25 37:9 57:13 appear 65:16 66:19 appearing 2:7,17 3:9,14 99:18 100:7 appears 53:8	applied 92:24 applies 55:6 appointed 66:10 appointing 63:18 appreciate 5:11 6:6 12:4,7,20 34:10 36:14 82:9 approximately 14:4 17:10 area 23:21 35:13 36:7 37:19 45:3 45:10 50:1 53:3 83:19,21 areas 38:19 43:24 44:12,14,19,20 45:14,22 81:19 83:8 95:10 armstrong 3:1,2 3:23 93:19,25 94:5,10,12,13 96:20 article 15:11 40:9 67:6,9,15 75:4,5 75:17 76:1,1 articles 15:7,13 39:9 74:25 75:20 ascertain 53:20 aside 14:10 33:25 asked 33:21 34:1 37:24 39:14 94:6 94:20 95:1,3 asking 7:7 8:18 19:1 25:8 66:4 90:19 asks 36:25 aspect 28:23 assembly 49:21,24 52:4 53:8 56:16 79:24 80:15 assignment 34:23 34:24 35:10,15	36:2 37:13,17 assignments 91:23 assistance 17:14 59:11 assistant 17:15,23 54:3 associate 26:9 65:23 associations 22:1 assume 13:11 27:19 72:10 79:3 attached 92:23 attorney 7:22,25 11:4 13:16,19 98:13,14 attorneys 12:22 13:6 19:25 94:14 authorized 86:9 86:12,20,25 automatic 86:20 available 54:18 70:25 ave 3:11 avenue 2:2 average 17:9 avoid 6:25 aware 8:4 16:19 24:18 45:11,20 65:22 66:21 77:3 80:19,22,24,25 86:8,10,14,18,19 86:22 87:3,7 95:21 96:1
b			
b 1:7,10 2:2 4:1 100:1 back 34:21 47:3 55:20 61:10 71:9 71:20 75:13 76:12 79:16,21 84:17,20 88:4 89:18 91:6			

[back - caucus]

94:2,18 background 85:8 backgrounds 29:4 badly 48:5 balance 38:3 ballots 87:1 base 33:8 based 10:21 49:20 52:15,25 70:8 71:4 80:6 82:3 92:16 basic 52:12 54:12 basically 52:15 68:15 basis 76:23,25 95:21,24 96:1 bear 38:18 44:1 47:5 54:23 bearing 26:5 began 60:19 beginning 38:13 60:12 begins 49:19 64:2 behalf 1:23 2:17 9:13 beings 93:15 believe 19:24 20:10,16 33:6 39:1 42:13 46:9 53:10 56:10,11 57:20 58:24 59:24 60:24 61:17,20,21 63:25 64:5,7 65:8 66:1,16,18,23 70:12 73:15 78:8 78:16 87:12 89:19 90:1,9 91:24 bench 63:16,18 65:6 best 36:5 87:11	better 6:11 18:10 48:22 60:19 beyond 32:3 86:2 big 8:15 bigger 82:16 biggest 85:17 bill 87:4 binational 91:19 bit 5:22 28:22 43:17 44:10 55:20 59:14,17 85:19 bja 3:4 black 82:20 blanking 65:12 block 7:15 25:18 25:22 26:1 board 1:6,12 99:4 101:1 boards 61:5 body 55:22 56:17 book 27:17 bottom 21:22 49:18 61:17 63:8 67:8 68:8 bracero 91:17,18 92:1,4 brady 3:1 break 7:11,13,16 31:21 34:5,10 44:9 76:8 79:5,11 96:23 breaking 59:17 breaks 7:14 34:16 brennan 1:7 brian 3:1 94:13 bring 94:18 bringing 58:11 brought 57:2 58:5 59:5 brown 27:17	brunswick 5:14 20:5 brutality 91:10 build 7:14 bureau 68:13,22 c c 2:6 98:1,1 ca 3:19 99:9,12,20 cabined 61:22 cadigan 1:8 calculate 54:16 calculations 54:12 caldwell 3:17,22 4:6 5:6,8 11:7,18 11:24 12:3,8 18:13,19 19:9,20 23:16 28:10 31:22 31:24 34:11,17,20 37:4,11 41:4 48:4 48:18 50:23 72:17 74:17 79:15,19 81:25 82:15 87:22 87:25 88:6 90:15 91:1 93:23 94:3,8 94:25 95:14 96:18 96:21 calendar 3:11 california 2:10 88:22 call 13:22 14:4 19:12 21:8 33:14 94:15 called 21:10 27:17 calls 50:20 60:19 cameras 56:17 candidate 69:9 candidates 25:14 63:20 66:2 69:14 69:15 81:12,17 83:6 95:7	capacities 1:11 capacity 1:13,17 2:18,19 3:14 captains 63:17 caption 20:13 car 37:8 care 79:13 carefully 42:22 casandra 1:10 case 1:5 5:10 9:7 10:12 13:5 16:5 17:25 18:20 19:3 19:18 23:5,11 24:19,19 25:3 29:1,10,17 30:23 31:4,10 32:2,10 33:9 34:22 36:13 37:13 40:3,3,15 41:13,19,23 42:4,6 42:7 53:18 65:19 73:19 80:20,23 84:24 94:15 97:2 cases 24:18,22,24 29:13 36:18 39:20 39:23 40:6 41:16 57:3,23 58:5,7,20 59:1 castillo 2:13 3:23 11:12,22,25 18:17 23:12 28:7 31:18 34:7,14 36:22 37:7 40:24 48:2 48:16 50:19 72:7 74:14 79:12 81:22 82:13 87:19,23 88:11 90:24 91:4 97:9 99:1 catch 6:14 7:3 30:15 caucus 2:22,22
--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

[ccp - conclusion]

ccp 99:9,12 ccr 1:24 98:20 census 50:4 53:23 54:6,8,14 68:13,22 70:9,14,18,18,24 71:4 73:5 79:25 center 85:18 century 21:20 22:2,5,5,7 27:22 36:8 43:25 44:13 47:20,22 49:14,16 51:20 92:15,15 certain 7:15 12:19 37:18 45:22 52:5 56:21 certainly 93:4 certificate 3:24 certified 98:3 certify 98:5 chair 26:8 challenge 45:12,21 46:2 80:20 challenged 80:22 84:24 85:2 94:17 champaign 88:20 89:4 chance 31:13 change 30:19 35:17,22,23 101:4 101:7,10,13,16,19 changed 18:11 changes 30:16 changing 24:11 85:19 characterization 28:2 74:6,8 characterize 47:8 53:17 characterized 53:14	charles 1:7 chart 71:9,10 73:24 chat 8:23 check 52:21 checked 52:20 chicago 2:15 3:7 15:6,10,12 21:20 22:2,13 23:21 27:18 28:14 34:25 35:13 37:10 40:9 43:22 44:24 45:1 45:2,6,9 57:3,3,12 67:6,10,19,24 68:3 78:11 80:18 83:19 90:8 chicago's 61:15 chief 1:7 choice 81:12,17 83:6 95:8 chose 72:23 85:7 85:14,24 christopher 1:16 2:21 chronological 53:11 chronologically 46:13,19 circuit 1:6 circumstances 38:4 citation 55:10,15 68:12 citations 55:3 75:19 cite 53:22 56:12 61:21 cited 15:1,10,12 40:4,18 74:25 75:25 78:18	cities 75:22 citing 40:23 76:20 citizen 72:2 73:1 78:22,24 citizens 59:12 citizenship 92:16 92:21,23 93:2,5 city 27:17 45:5,7 61:5,16 67:10 civil 99:19,20 claim 22:4 clarify 7:9 23:1 41:5 58:11 68:6 92:19 clarity 21:14 clark 3:6 class 28:14 clause 96:4 clean 6:8 10:9 12:15 clear 5:25 6:21 clearly 7:6 close 8:24 cluttered 9:4 coalitional 28:15 28:22 code 99:9,12,19,20 cognizant 88:1 cohesion 84:3 college 88:16,18 come 29:16 52:1 76:12 77:2 79:16 comes 7:6 69:25 coming 87:13 96:25 commenced 5:1 commentary 90:20 commission 57:4 57:12	commissioner 60:23 committees 21:25 communicating 8:5 communications 16:23 communities 62:7 81:21 83:10 95:12 community 54:11 60:9,12 68:13,22 70:2,11,17,22 71:2 71:6 90:11 91:13 92:2 companies 57:19 companion 94:14 compared 51:3 53:24 68:3 69:14 79:25 comparing 54:6 comparison 50:15 68:5 complaint 9:12,14 59:8 complete 31:3,5,9 32:1 36:2 39:10 completed 99:7,17 100:6 completion 100:10 comport 68:19 computer 8:24 concentrated 67:25 85:16 concerns 91:13,13 conclude 48:25 49:4 50:2 concluded 43:23 conclusion 44:6 47:8,9,25 48:1,10 48:13,14,20 50:20 52:2 53:15,18
-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

[conclusions - date]

conclusions 32:20 43:18 47:4 49:12 50:25 51:19 conditions 93:14 confer 8:16 confirm 19:21 23:3,25 27:6 29:7 38:24 42:10 45:24 46:7 52:13 61:22 62:20 69:20 71:3 confirmed 53:5 confirming 59:5 conflict 84:13 congress 60:25 91:21 connecting 5:13 conservative 84:2 consider 21:11 22:1,14,16,18 50:9 57:25 consideration 73:11 considering 21:6 72:11 constitute 68:16 constitutionality 27:13 constraints 30:22 31:15 36:10 consulted 18:9 40:21 contact 99:9 contacted 16:4 contain 31:9 32:1 55:17 62:6 contained 33:16 contains 31:3,5 33:7 context 36:24 37:14 78:9	continue 40:25 54:23 65:2 91:15 93:5 continued 56:5 continues 65:9,11 65:12 91:11 contract 16:15 contreras 1:2 9:23 10:2 24:6,14 42:14 45:12,16,21 99:4 101:1 control 61:15 controls 63:15 conversations 36:23 39:6 convoluted 7:7 cook 45:8,9 60:23 63:16 65:6,10,24 65:24 66:6,21 69:5 71:11 77:10 77:14,18,25 78:4 85:2,3,8,14 copies 10:9 42:5 copy 12:6,15 18:16 19:11,16,24 20:17 35:6 42:4 copying 4:5 corbett 1:24 98:3 98:20 cordova 75:5 correct 10:1 12:24 13:1 16:2 18:6,7 19:22 20:18,20,20 21:1,3,4 23:5,11 23:23 24:7,11 25:7,11,18 26:1,10 26:12,15,19 27:20 27:21 28:3,6 30:5 30:6 32:22,24 33:20 34:2 36:16 38:1 43:6,10	44:22 46:23 47:1 47:10 53:10 55:5 55:8 56:3,9,14 57:14,22 58:14 62:4,22 63:10,11 64:17 67:4 71:13 71:22 72:4 76:21 77:11 78:1 89:14 89:15 96:6,7,9,15 corrected 9:24 42:14 65:3 correction 57:11 corrections 30:8 99:14,15 100:3,4 correctly 15:11 16:10 57:17 councils 61:5 counsel 7:18 8:6 8:10,13 9:13 11:7 13:7 18:13,21 33:21,25 35:15 36:17 39:3,6 40:7 88:12 89:18 98:13 98:14 99:18,21 100:7 counsel's 42:20 count 51:23 counties 77:19 county 45:8,9 60:23 63:16 65:6 65:10,24,24 66:6 66:21 68:17 69:5 69:5,6 71:11 77:10,14,18,25 78:4 85:2,4,8,14 county's 65:14 countywide 66:10 66:21 couple 9:5 40:7 76:9 93:20	course 23:9 30:20 35:17 court 1:1,9 4:5 5:24 6:8,16 19:10 19:22 21:3,10 30:5 33:24 98:3 cover 9:23 20:22 28:1,16 44:20 46:15 covers 28:18 create 5:25 creating 70:2 crimes 56:21 critical 60:2 crr 98:20 csr 1:24 current 27:2 55:10 62:6 64:16 85:21 91:12 93:10,13 currently 15:23 16:2 26:8 50:14 65:9 81:1 84:3 cut 42:9 cutting 32:25 cv 1:5
d			
d 3:21 daley 61:18 62:1,8 dan 2:17 data 25:6,9 53:12 53:23 54:8 68:13 68:14,22,22 69:1 69:21 70:2,9,11,14 70:17,18,18,22,24 71:4,6 72:5 73:5,8 75:14 76:4,15,18 77:21 databases 39:8 date 9:14 16:14 20:1 85:25 99:16 100:5 101:24			

[dated - drew]

dated 20:24	democratic 44:3	29:3 44:19,20	85:1
day 1:25 14:6	45:13 47:7 63:14	71:11 72:2 78:23	dive 43:11
47:15 54:10 55:7	66:20 85:21 87:11	differently 32:19	divides 83:25
86:12,12 87:5	demographic 76:4	difficult 54:9	division 1:2 54:19
89:25 90:13 91:8	76:15,18	direct 37:1	90:6,8
93:3 98:16	demographics	direction 98:11	doctoral 26:18
days 66:9 90:7	81:18 83:7 85:8	directly 9:6 41:12	document 9:15,21
de 2:21	95:9	disagree 61:7	10:23 11:10 14:12
decade's 70:24	demography	67:17,20 79:1	20:22 21:6,9,11
decades 61:15	22:19,21	83:11 84:8,10	35:21 42:4,10,19
62:13	departs 32:14,16	96:8,15	42:21 70:4 81:24
december 2:1	deposed 5:19	disclose 11:23	documents 10:5
98:17 99:3,5	deposition 1:22	disclosures 41:1	14:8,16 40:8 41:2
decisions 72:6	5:1 13:10,14,16,25	discrimination	doing 27:1 82:7
73:9,22	14:18,21 19:6,13	20:23 21:12 35:2	dolores 2:21
declaration 20:14	31:17 94:23 97:16	35:12 38:19 43:24	don 1:13 3:14
35:5 81:3,9 82:19	98:8 99:19,22,24	44:2,12 47:5,18	donahue 1:8
94:1,19,20 95:5	100:8,10	49:5,8 54:24 56:1	doors 60:10,15
declare 44:1	depositions 19:14	56:6 57:5,6,9 58:1	double 6:25 7:3
defendants 1:21	describe 22:11	58:16,20	52:20,21 89:2
1:24 3:9,14 5:9	described 35:10	discuss 32:17	dow 1:8
45:13 81:4	62:8	36:23 38:12 63:9	dr 5:7 12:8 19:10
defense 2:7	description 4:1	79:23	19:17,21 20:14
definitely 7:11,17	designed 91:22	discussed 14:14	34:20 41:2,13
degree 60:17	desk 9:2,2,4 10:11	49:13 55:25 74:5	42:24 66:19 78:21
88:19,21	12:21	75:8 78:2,23	79:13 81:24 82:2
deguilio 1:8	detail 14:14 40:5	79:20 80:4 92:14	87:8,21 88:7,13,15
del 2:13 3:23	details 43:12	discussing 37:20	90:18 91:2 93:17
11:12,22,25 18:17	75:24 97:13	43:16 49:25 59:25	94:12 97:2
23:12 28:7 31:18	determine 52:5	69:22	drafting 35:19
34:7,14 36:22	54:17	discussion 60:9,22	39:4
37:7 40:24 48:2	determined 80:4	62:1 94:22	drafts 35:20 89:18
48:16 50:19 72:7	99:18,22 100:7	disenfranchisem...	dramatic 32:6
74:14 79:12 81:22	determining 81:15	49:6	dramatically
82:13 87:19,23	83:4 95:6	dissertation 28:4	30:19 32:14,17
88:11 90:24 91:4	diaz 2:21	distribution 4:6	draw 25:2,7,9
97:9 99:1	diego 88:22 89:5	district 1:1,1 53:3	50:24,25 51:19
delcastillo 2:16	differ 33:4	districts 18:3,3,10	drawn 23:5,11
99:2	difference 50:21	18:11 24:10 46:2	24:2 91:20
deletions 30:8	different 5:23	46:8 80:10,15,20	drew 45:13
	11:20,21 12:13	80:23 83:25 84:23	

[duly - familiar]

duly 5:3 98:7 durkin 2:19 dynamic 64:4 dynamics 81:20 83:9 95:11	87:5 elections 1:6,12 55:18 63:3,5 64:2 73:4 99:4 101:1 electoral 28:25 eligible 72:12 eliminated 86:15 emanuel 1:16 emergence 60:3 employee 98:12,14 employers 57:5,8 57:10,16,17,21 employment 38:20 44:15 46:17 57:4 57:9,25 empowerment 60:4 enacted 86:24 ended 97:16 endorsed 66:20 enforcement 56:7 entire 11:14 45:23 72:11 81:10 entities 58:18,22 ernest 2:8 errata 99:14,16 100:3,5 errors 30:11 especially 97:2 esq 99:1 established 87:5 estimates 71:2,3 ethnic 21:21 29:3 89:6 event 90:12 events 63:23 89:13 90:19 91:7 eventually 60:25 everybody 87:18 evidence 47:12,15 47:21,24 48:9,12	48:13 49:13 53:12 ex 63:17 exact 16:14 exactly 15:3 39:2 42:25 69:24 examination 3:22 3:23,23 5:5 88:10 93:24 examined 98:6 examining 81:18 83:7 95:8 example 30:12 77:18 examples 35:1,11 62:6 exciting 96:22 excluded 63:20 excludes 64:4 exclusively 70:17 excuse 64:8 executed 20:4 exert 29:21 exhibit 4:2,3 19:7 19:12 exhibits 4:5 existing 43:21 exists 84:3 expect 13:17 experience 47:19 51:8 54:23 56:6 90:13 91:8 93:3 93:10 97:4 experienced 35:13 experiences 47:18 expert 13:4 14:22 16:22 19:17 20:23 21:12 22:2,4,15,17 22:19 23:7 29:21 29:23 31:11 32:10 38:15 41:1,18,22 42:20,24 43:7	50:10,18 73:3 90:21 97:4 expertise 22:9 23:19,20 36:7 37:19 50:23 51:20 52:9 54:6 89:9 experts 42:1 explain 36:20 explained 13:17 36:17 39:7 explaining 29:5 explicitly 73:12 express 31:4 33:9 60:22 expressed 84:13 90:2 91:14 expressing 96:6 extends 36:7 extent 38:17 90:16
e			f
e 1:8,24 2:6,6 3:21 4:1 8:8 16:6 19:15 98:1,1,3,20 99:9 99:12 100:1 101:3 101:3,3 earlier 42:12 43:16 45:18 78:3 early 56:9 60:1 86:9,16 88:1 earned 21:20 easier 69:18 east 2:14 3:2 eastern 1:2 educated 88:15 education 38:19 44:16 52:12 60:11 60:20 88:16 educational 2:7 89:5 effect 24:14 effectively 38:21 44:3 47:6 effects 38:18 44:1 47:5 eherrera 2:11 either 10:5 16:3 35:15 41:16 59:3 75:3 elaborating 47:17 elect 81:12,16 83:6 95:7 elected 61:4 62:6 65:24 election 21:25 72:18 86:12 87:2			f 98:1 face 74:4 fact 59:9 66:5 92:4 96:4,6 factor 37:20,21 38:3,11,16 factors 10:14,20 10:24 11:1,10,14 11:20 36:16,18 37:12,18,22,25 38:7,11,23 40:14 fair 22:8 26:16 28:1 44:5,25 56:2 74:8 89:8 90:24 92:1 fall 26:14 familiar 16:20 24:23 28:23 36:15 40:11,16 45:24 46:4 56:15,18,22 56:23 59:9,13

[familiar - going]

66:5,7,8,12 72:18 83:18 families 92:12 fan 27:5 far 22:3 28:16 29:13,15 36:7 52:18 fashion 16:7 favor 38:7 federal 31:25 32:9 100:1,8,9 feedback 35:19 feel 7:9 30:14 36:1 50:24 81:25 felipe 2:21 fellowship 26:18 fernandez 1:22 2:13 3:22,23 5:2,7 7:18 11:12,13,22 11:25 12:8,25 13:20 15:18 18:17 19:10,12,21 20:14 23:12 28:7 31:18 34:6,7,14,20 36:22 37:7 40:24 41:2 41:13 48:2,16 50:19 72:7 74:14 79:12,13 81:22,24 82:2,11,13 87:19 87:21,23 88:7,9,11 88:13,15 90:24 91:2,4 93:17 94:12 97:2,9 99:1 99:5 101:2 fernandez's 11:11 19:17 90:18 ffernandez 2:16 99:2 fifth 66:10 figure 62:16 65:7 69:20,21 71:9	73:14 77:9 82:16 figures 51:13,17 53:24 54:7,14 55:17 63:4 66:17 70:16 72:21,25 73:21 76:4 79:2 filed 9:13 20:1 42:4 files 42:18 filing 9:9,10 20:2 20:13 26:10 42:11 59:8 filings 42:6,7 final 21:2 finalized 18:22 finally 93:7 financially 98:15 find 71:5 89:19 fine 12:14 15:17 19:19 21:15 33:2 35:8 79:10,14 84:15,16 87:22,25 finish 6:4,7 48:10 76:9 85:11 finished 26:18 firm 5:8 15:21 first 4:3 5:3 6:14 13:15 16:4 21:18 34:22 43:14 44:10 44:10 47:9,24 48:10,13 55:25 56:4 57:1 61:14 63:13 70:13 71:16 75:4 96:4 97:4 five 56:16 67:1 flip 69:18 flips 49:19 focus 35:11 46:17 81:14 85:7,14 89:6	focused 44:25 focuses 45:2 47:21 66:13 72:19 focusing 43:19 83:1 folks 51:14 follow 87:21 following 48:21 follows 5:4 99:8 footnote 15:8 40:21 56:12 69:22 75:1 76:24 footnotes 33:13 forgetting 41:6 form 23:13 28:8 29:4 48:3,17 72:8 74:15 91:14 format 13:25 35:21 former 64:8 92:11 forth 89:18 forward 32:10 34:16 51:18 72:15 97:1 four 18:1 66:20 fracture 84:2 francisco 2:13 3:19 99:1 frcp 100:1 free 7:9 frequently 70:21 front 9:3,6 11:5,17 12:15,21 20:8,21 80:1 fuentes 1:3 full 9:2 fully 55:1 92:24 functions 8:23 fund 2:7 funded 29:8,9	funding 29:15 fundraisers 63:18 further 33:11,20 88:7 90:17 93:18 96:14 future 72:16 76:8 fyi 87:20 g garcia 60:23 garner 3:2 general 14:15 46:25 56:16 77:1 generally 22:8 23:22 26:16 27:22 28:18 35:1,14 44:6 45:8,9 46:16 46:18 54:5 62:12 66:5 71:5 72:19 73:4 93:16 94:22 geographic 44:18 45:14 geographical 53:3 geographically 46:5 geography 46:11 given 30:22 36:3 36:10 51:17 53:18 54:14 go 5:21 6:2 7:5 12:18 14:14 23:14 33:2 34:13,15 55:20 75:13 79:8 79:15 84:17 85:10 88:3,8 93:19,21,23 goes 24:17 48:9,12 76:13 89:7 going 8:6 27:2 30:21 34:8,16 36:25 37:6 40:25 42:23 47:2 49:8 55:20 61:10,16
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

[going - incredibly]

63:8 71:9 72:15 79:21 84:17 87:20 88:12 89:11,12 91:5 97:11 good 10:3 21:14 34:4,18 79:10 88:2 google 52:23 80:11 gotcha 10:2 government 60:10 60:16,20 89:2 grammatical 30:11 granted 92:20 grants 29:6,8 grateful 88:14 great 5:15 8:23,25 12:17 19:9 21:5 21:16 22:14 26:20 27:4,5,24 28:21 29:5,18 45:11 61:10 68:6 75:22 76:19 84:22 88:25 griselda 2:12 ground 5:22 groups 93:6 growth 50:1 51:4 53:21 guadalupe 92:21 guarantee 97:10 gudino 66:8 guess 9:12 73:11 gvegasamuel 2:16	hands 56:7 happen 80:14 81:3 97:11 happened 89:23 89:25 happening 8:17 19:14 happy 11:23 harmon 1:13 3:9 3:14,16 harp 79:20 harvard 88:18 heading 21:19 health 38:20 hear 59:18,19 91:3 95:25 hearing 79:9 88:1 96:24,25 heather 3:10,11,13 held 26:13 help 17:1 39:8 helped 17:16 25:2 helpful 15:9 41:1 82:4 henry 26:8 hereinbefore 98:10 herrera 2:8 hi 5:7 hidalgo 92:22 high 43:11 44:6 48:19 49:9 higher 60:10 78:5 highlighting 68:15 hinder 38:20 hinders 44:2 47:6 hired 35:24 hispanic 52:23 71:18,18 78:25 hispanics 67:10,18 67:23	historian 11:3 21:24 22:12 23:19 62:10 89:9 91:25 93:8 historians 62:12 historical 35:1,12 47:16,18 48:9,12 48:24 49:3,14 54:22 59:22 62:14 86:3 historically 39:20 68:11 history 21:20 22:2 22:3,5,6,13 23:21 28:14 34:25 43:23 44:11 49:4 51:20 89:6,9,12 92:5,6 93:9,12 hold 93:19 holders 63:17 holiday 87:6 home 5:13 honest 39:15 hopefully 12:17 hoping 8:14 12:12 hours 14:5 17:4,9 17:11 18:2 house 1:18,20 2:20 2:22 64:5,8 housing 44:15 46:18 57:6 58:15 58:20 59:11 huh 6:11,20,20 15:14 36:19 50:16 80:13 83:15 human 57:3,4,12 93:15 humboldt 90:11	i ian 1:7 identification 19:8 86:16 identified 52:16 52:18,24 identify 54:10 ideologies 84:2 ii 27:19,23 91:20 il 3:12 illinois 1:1,6,12,14 1:16,18,20 2:15,18 2:20,22,22,23 3:3 3:7,14,15 20:24 21:13 22:15,17 23:22 34:25 35:13 38:18 39:21 51:5 51:16 68:4 85:17 85:22 86:6,9 87:10 88:20 99:4 101:1 illustrate 68:23 ime 8:8 immigrant 89:20 important 41:5 60:7 81:10 92:19 incident 56:11 include 72:24 85:25 86:1 89:21 included 10:22 14:24 32:11 67:13 76:3 80:18 89:17 99:14 100:3 including 14:12 63:20 67:15 72:12 84:1 inclusion 73:13 income 59:12 increased 78:10 incredibly 81:10
h			
h 4:1 101:3 haine 1:9 hall 2:2 61:16 hand 35:22,23 98:16 handled 99:8			

[indexes - latinos]

indexes 81:19 83:8 95:9 individual 16:21 individually 2:19 2:20 individuals 16:20 inequalities 74:3,3 74:4 influence 63:16 inform 77:4 information 17:17 53:7 55:10,15,21 69:8,12 77:2,5,7 85:13,20,25 86:1 informed 18:8 47:19 70:5 informs 93:13,14 93:15 ing 8:8 initial 35:20 insight 13:24 insights 37:21 instance 52:22 institute 75:22,22 instructs 7:21 intend 31:4,6 32:4 32:13,21 33:3,9 intending 32:7 33:13 intention 34:1 interactions 44:17 interest 52:11 interested 48:21 51:12 98:15 interesting 97:3 interrogations 56:21 interrupt 6:13 91:2 introduce 19:11	introducing 73:25 introduction 74:10 involved 16:18,23 29:12 58:22 involving 39:20 irene 1:3 irrelevant 89:24 irvin 1:2 irving 3:2 issue 8:15 23:5,11 25:3 27:13 32:4 91:12 itasca 3:3	k k 1:7,8 kane 69:5 katherine 1:10 keep 34:8 68:20 88:13 kept 17:8 kilmer 2:2 kind 8:4,21 17:17 18:4 42:22 43:8 43:11 44:25 46:24 47:2 57:8,9,16 60:8 73:25 kinds 36:18 90:3 know 6:1,4,10,25 7:5,11,14,15,22,24 8:6,11,15,17,21 10:3,7 12:13 13:7 13:25 16:19 17:24 18:2 19:10,25 20:10 22:11 23:2 23:23 29:14,15 30:12,20,23 31:13 31:16 32:5,18 33:23 35:16,20 36:10 37:15 39:20 39:22 40:2 42:2,3 44:16 46:1 48:5 48:19,22 50:7,13 51:12,15,22,24 52:1,11,11 54:8,9 54:15,16,16 55:23 58:21 61:12 62:11 65:1,5 68:17 71:3 72:5,9 73:12 74:6 77:2,3,20 78:14 79:4,23 80:17 84:9,15,23 85:1,3 85:17 86:3 93:1,4 93:13 95:16,19 96:11 97:2	knowledge 23:20 86:3
			l la 2:21 labeled 4:3 46:15 46:17 labor 91:23 lack 49:6 74:1,11 74:19 lagged 68:11 lagrange 3:12 lake 69:5 larger 10:22 78:11 late 60:1 latham 3:17 5:8 latino 20:23 21:12 21:20 22:2,12 28:14 47:19 50:14 51:20,23,25 52:6 52:14,24 53:8,18 55:11,12 60:3 64:20 65:5,10 66:10 68:10 69:9 69:15 78:5,5,15 79:24 80:5,15 81:9 85:15 90:2 90:13 91:8 92:2 93:3 latinos 23:21 25:14,18,22 29:3 34:25 35:12 38:18 39:20 40:9 43:22 43:23 44:1,11,24 47:4,16 49:5 50:1 50:2,16 51:2,15 54:22 55:13,17 56:5 57:2 59:16 59:21 60:16 61:1 61:3 63:20 64:4 65:13,25 66:6,20 68:16,23 69:4

[latinos - measuring]

74:1,4,11,19 78:10 81:1,11,16 83:5 91:11 95:7 latinx 84:5 laura 1:8 law 3:5 5:8 15:21 27:5 39:7 56:7 58:13 59:10,13 72:18 laws 56:15,19,22 93:2,4 lawsuits 59:5 lawyer 27:7 layperson 51:18 lbgalaw.com 3:4 leader 2:18,19 leaders 72:14 84:5 leads 47:25 48:24 49:4 leave 12:21 led 49:5 legal 2:7 27:9 29:22,24 39:9,19 50:20 59:6 75:11 75:14 99:7 legislative 18:3 22:22,25 23:4,10 23:19 45:13,21 83:24 legislators 25:2 51:24 52:19 legislature 50:13 51:3 61:1 86:9,11 86:20,24 legislature's 53:2 80:13 legislatures 61:6 leticia 13:22 16:6 level 43:11 44:6 48:19 49:9	levels 55:10 leverage 67:11,19 67:24 68:2 library 39:8 lichtman 78:21 lichtman's 42:24 66:1,19 87:8 life 81:20 83:9 95:10 light 11:15 liked 36:6 lilia 1:22 3:22 5:2 20:14 34:8 36:22 99:5 101:2 limited 35:9 37:18 62:2 71:23 92:16 line 31:19 99:15 100:4 101:4,7,10 101:13,16,19 linnabary 1:7 list 10:13,16,23,25 11:17,23 27:24 29:20 52:16 literally 63:12 little 5:22 28:22 32:6 43:17 44:9 55:20 59:14 69:18 83:18,25 85:19 llc 3:2 llp 3:17 local 14:25 84:5 locales 68:24 locate 17:16 located 5:11 locating 18:2 locked 99:12 100:1 logistical 97:13 long 14:3 27:24 42:20 43:23 44:11 49:23 75:2,6 93:1	longer 34:15 88:13 look 20:3 39:11,22 55:4 56:13 61:18 62:12 70:23 75:1 77:20 looked 14:24 45:19 51:24 52:16 53:23 70:13 71:1 80:9,12 looking 15:6,7 17:17 39:9 50:12 51:12,13 looks 13:25 27:25 59:17 62:17 71:10 los 2:10 lot 39:11 92:7 loud 50:6 low 59:12 lower 29:1 54:25 lucy 2:2 luetkehans 3:1 luna 2:21 lunch 96:23 lw.com 3:20 m m 1:8,9 madigan 64:6,8 mail 16:6 19:15 86:25 87:1 mailing 8:8 major 89:3 majority 40:19 63:15 makeup 77:14,15 77:24 making 39:16 67:14 maldef 2:9,13 12:25 13:6 15:18 15:24 29:9 94:16	maldef.org 2:11 2:16,16 99:2 malina 17:19 man 90:11 mantra 36:12 manuscript 28:11 map 24:6 45:14,22 81:10,15 83:5,24 86:24 94:17,21 95:6 maps 17:16 18:2,5 23:4,11,19 24:2,14 24:22 25:2,7,10 27:13 45:19 marked 19:7 martinez 1:3 master's 88:19,21 materials 29:19 33:22 39:4,12,17 39:24 40:1,17 math 53:25 matter 29:22 31:17 46:20 96:14 matters 15:24 16:3 29:20,24 82:11 maximized 81:11 81:16 83:5 95:6 mcconchie 2:18 24:19 94:15 mcguffage 1:9 mean 14:10 31:7 32:8,12 42:11 44:18 52:10 56:8 74:4 75:9 88:16 94:23 means 13:6 44:19 62:20 meant 31:25 measuring 73:6
----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

[meet - office]

meet 13:12 14:1 meeting 13:13 14:9,17 18:21 member 60:24 members 1:11 49:24 52:5,14 53:8 64:19 79:24 80:5,15 memory 41:7 57:20 mention 38:11,23 45:18 89:16 97:12 mentioned 36:15 38:13,15 39:19 42:11 59:15 66:2 66:3 73:1 87:8 89:14 90:5 91:16 mentioning 39:18 78:7 messaging 8:10 metric 71:14 mexican 2:7 91:23 92:6,20,24 mexicans 27:18 mexico 91:20 92:5 meza 3:5,5 meza.law 3:8 michael 1:7 mid 16:9 midwest 59:22 60:4 61:4 miguel 75:4 mind 12:9 31:20 34:21 47:13 55:22 56:25 61:11 63:7 79:21 81:7 87:14 94:4 minimize 8:25 minor 30:11 minority 2:18,19 63:20	minute 37:9 minutes 34:11 79:6,10 87:15 88:4 mirror 74:13,20 mischaracterize 78:12 80:8 missed 52:17 87:17 missing 30:12 missouri 98:4 mistaken 78:17 mobilize 60:19 moderate 84:1 moment 60:3 70:20 77:4 91:12 93:13 montgomery 3:18 motivations 25:1 mouse 83:2 movement 62:14 moving 47:2 69:17 multiple 19:14 83:25 municipal 60:10 60:15 municipality 68:17	necessary 99:14 100:3 need 5:25 6:9 7:10 7:19,25 8:13 33:15 39:8 41:11 49:22 82:1 96:11 needed 11:4 37:14 needs 6:1,16 62:7 negative 7:3 negatives 6:25 neither 96:8 nested 46:24 new 2:3 5:13,14 20:5,5 56:15 65:23 66:6 90:20 nice 12:5 18:15 nod 6:20 nomination 21:24 non 71:18 normal 5:23 84:18 84:18 north 3:6 northern 1:1 northwestern 26:22 27:1,4 notating 99:15 100:4 note 4:5 30:7 73:15 noted 67:9 notes 10:6,7 82:12 87:15 notice 1:25 30:14 noticed 30:11 november 19:18 19:23 20:5,6,19,25 21:6 number 9:15,21 15:12 27:25 42:4 50:1 51:23 61:1 65:12,15 76:3	99:15 100:4 numbered 10:23 10:25 numbers 49:23 51:13 53:24 54:10 68:18,19 71:16 74:13,21 79:23 numerous 57:2
			o
			oath 5:4 oberweis 89:14 object 7:24,25 23:12 28:7 37:1 48:2,16 90:16 objection 50:20 72:8 74:15 objects 7:19 observation 67:14 observations 50:12,17 51:7,9,14 obtained 88:22 obviously 83:13 occurred 62:11 63:24 october 65:22 66:11 offer 31:13 32:4 32:13 33:3 offered 71:16 offering 23:3,6,9 23:18,20 24:1,4,5 24:9,13,21,25 25:5 25:8,13,17,21 26:2 27:9 31:10 32:2 65:19 73:7,18 74:11,18,22,23 77:12,23 offers 38:15 office 1:15,19 3:9 3:9,15,15,16 54:25 55:18 63:17 68:24

[office - pending]

69:4,10 99:11 officers 56:17,20 offices 2:1 61:4 official 1:11,13,17 2:18,19 3:14 9:11 70:18 officials 56:7 62:6 oh 5:15 9:14,22 17:7 27:4 35:4 42:9 44:18 57:1 57:13 65:1,5 76:9 82:22 okay 5:21 7:4 9:7 9:18,22 10:2,9,11 10:16,22 11:2,24 12:22 13:9,21 14:1,8,16 15:8,17 15:23 16:1,4,8,16 16:25 17:4,11,18 17:24 18:5,12,13 19:9,9,20 20:3,9 20:12 21:5 22:7 22:18,22 23:18 24:4,9,17,25 26:4 27:9,16 28:21 29:12,18,25 30:3 30:16 31:2,24 32:16,23 33:3,7,15 33:25 34:4,11,12 34:17 35:4 37:3,4 37:11 39:3 40:7 40:13 41:12,25 42:3,17 43:4,7 44:9,18,23 45:6,11 46:1,4,7,24 47:2 47:21 48:18 50:8 53:7,20 55:20 56:24 58:11 59:4 59:14 60:21 61:10 63:2,6 64:12,16 65:5 66:25 67:5	67:17 68:21 69:12 70:1,7,10,21 71:5 71:9 72:17 73:7 73:17,24 74:9,25 75:16,24 76:6,19 76:22 77:9,22 79:5,15 80:3,19,25 81:7 82:6,18,22,25 83:21 84:12,15,16 84:22,22 85:19 86:4,8 87:14 88:3 94:8,8 96:8,13,21 96:25 97:1 once 14:2 19:14 50:7 ones 10:15 15:15 open 8:23 opened 60:10,15 opining 38:6 opinion 23:10 24:1 24:4,5,10,13,21 25:1,5,8,13,17,21 26:2 37:24 50:10 55:6 60:22 73:7 73:18 74:11,18,22 74:24 76:23 77:1 77:12,23 81:15 83:4 84:7 91:25 93:8 94:21 95:6 96:5,6,9,12,15 opinions 18:8 23:3 27:10,12 31:4,6,10 31:12 32:2,9 33:4 33:8,16 43:8 50:18 65:18 84:12 90:17 opportunities 81:16 83:5 95:7 opposed 6:19 70:18 72:20	opposing 42:19 order 18:9 52:5 organization 16:3 organizations 29:16 organized 46:10 46:12,19 original 4:5 10:19 20:17 99:10,21 originally 10:20 36:2 ortiz 17:19 outset 36:21 37:13 39:14 outside 14:17 36:24 45:4 90:22 overall 40:19 46:22 47:3 77:16 overview 59:22 o'brien 1:10	99:17,17 100:3,6,6 paper 6:2 59:21,23 59:25 75:10 papers 12:13 59:15 paragraph 21:18 21:22 22:8 43:16 43:20 47:3 49:17 49:25 55:25 56:5 57:2 61:14,16 63:7 64:4,10,11 68:9 83:23 94:11 95:4 paralegal 97:12 park 3:2 90:11 part 6:14 19:13 29:9 50:9,10 87:9 92:10 participate 38:21 44:3 47:6 81:11 participated 55:1 participating 13:16 particular 75:10 95:3 particularly 11:16 70:24 parties 58:19 94:15 98:13 parts 45:5 80:18 party 2:23 38:7 63:14 passed 56:16,19 59:10 pdf 99:12 100:1 peggy 1:24 5:24 19:16 98:3,20 penalty 99:16 100:5 pending 7:12
		p	
		p 2:6,6 29:2 p.c. 3:11 padilla 1:4 page 3:21 4:1,3 9:23 20:4,4,8,13 20:22 21:16 38:14 38:14 43:14 48:22 48:23 49:18,20 53:2 55:23 56:24 57:1 61:11,17 62:16,17,18 63:6,7 63:8,9,13,14 67:5 67:8 68:7,7,9 69:17,19 75:12,12 79:22,23 82:10 89:20 94:4,7,9,11 99:15 100:4 101:4 101:7,10,13,16,19 pages 12:19 43:3,4 69:19 75:6 99:14	

[people - professional]

people 72:15 92:9 92:17 93:16 percent 50:3 53:21 78:16,25 percentage 68:16 78:4,14 percentages 54:17 performed 18:20 period 13:23 17:9 27:20 28:1,5,15,19 46:11,14,25 56:8,8 60:7 61:23,25 62:2,21 99:18 100:7 periods 27:21 perjury 99:17 100:6 permanent 86:25 perpetuate 74:2 persisted 43:25 44:13 person 8:5 personal 34:1 personally 52:4 80:4 persons 72:13 perspective 47:16 83:12 ph.d. 1:23 3:22 5:2 21:20 28:5 88:23 phobia 90:2 phone 8:20 photos 53:5 phrase 7:1 32:19 pin 75:3,7,9 piscataway 2:3 pivoting 59:14 place 48:19 98:9 places 11:21 46:16 68:3 69:4 88:25	plaintiff 2:7 plaintiffs 1:5 2:17 9:13,23 10:3 12:23 20:15 24:6 24:14 39:3 41:13 41:15,23 42:1,14 45:12,21 58:7 73:19 80:19,22 84:24 94:14,16 plan 7:16 9:24 20:16 33:19 42:15 planning 21:8 82:24 please 6:15 8:7,20 18:25 48:6 point 33:22 53:16 67:16 68:14 75:16 pointing 40:2 points 33:11 police 37:8 56:1 90:10 91:10 policies 72:14 86:5 86:5 policy 75:20,23 89:5 political 25:14 38:21 49:6,7 55:2 60:3 61:15 66:15 67:11,18,24 68:1,2 68:10,18,19 72:14 74:1,12,19 77:13 77:23 78:10,24 81:19,20 83:8,9 84:3,4 89:4,21,23 90:3 95:9,11 politicians 84:6 politics 22:15,17 28:15,22,24,25 29:1 93:15 polls 85:21	poorly 7:2 popping 8:22 population 50:3 50:15 51:4,4,25 52:1 53:22 54:10 65:10,14 67:25 69:1 71:11,14,17 71:19,21,23,24 72:1,2,5,11,20,20 72:24,25 73:2,5,6 73:8,20,21 74:13 74:20 78:4,5,11,15 78:22,24,25 85:16 85:18 92:25 portion 65:10 portions 43:1 position 26:13,23 positions 66:15,21 66:25 possible 40:22 76:7 96:16 possibly 77:7 80:10 post 26:18 27:18 27:19,22 power 78:10 precinct 63:17 prefer 25:15 34:12 prejudice 56:6 prejudicial 11:16 preliminary 70:14 preparation 14:17 15:5 19:6 prepare 13:13 14:20 present 47:15 49:23 55:7 86:7 89:24 90:13 91:8 93:3 presented 33:24	presenting 47:11 47:14 president 1:14,15 3:9,14,15,16 presumably 43:4 previously 29:24 primarily 37:20 45:2 47:23 49:15 57:17 primary 43:21 45:3 66:20 print 9:8,9 10:17 printed 20:10 prior 98:6 prioritizing 62:7,8 private 57:19,21 58:1 privately 8:16 privilege 7:22 8:14 privileged 37:1 privy 19:25 42:19 probably 16:9 18:1 34:5 54:1,19 67:23 97:3 problems 92:8 procedure 99:19 99:20 proceed 8:1 23:15 process 13:18,24 28:16 30:22 38:22 44:4 47:7 55:2 63:10,19,19 81:11 produce 35:25 37:16 produced 11:9 36:10 75:21 producing 35:24 product 7:23 professional 21:24 93:8
-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

[professions - relevant]

professions 60:11 60:13 professor 11:11,13 26:9,17,22 66:1 program 91:17,18 92:1,4,7,10 progress 28:11 project 27:3 promise 87:24 properly 24:2 proportion 65:13 proportionally 51:15 propose 24:11 proposed 9:24 20:15 24:6 42:14 protection 59:11 prove 59:6 provide 5:16 37:24 39:3,13 40:15 58:10 68:25 69:2,11 85:20 provided 40:10 99:19 100:8 providing 35:20 59:11 public 58:18,21 75:23 published 27:25 59:16 puerto 27:18 90:10 pull 41:9 82:8 purely 52:24 purposes 13:10 pursuant 1:9,25 put 8:21 51:17 82:17 90:23 94:1 putting 12:10 32:10 82:25	q qualifications 21:18 43:15 question 6:7,12 7:2,9,12,13,19,20 7:24 18:24 23:8 25:20 37:5 42:17 45:17 48:11 74:16 77:22 82:3 85:11 90:25 91:5 questioning 31:20 88:7 questions 8:7,12 8:18 12:18 41:8 76:10 87:21 89:11 93:18,20 94:6,20 95:1,4,13 96:17 quick 79:5 82:3 87:24 quickly 77:9 79:8 97:10 quote 60:12 67:6 67:12 quoted 38:16 75:18	r r 1:9 2:6 98:1 101:3,3 r&s 100:1,9 race 75:23 92:16 93:2,5 racial 43:24 44:11 77:14,15,24 92:22 ran 55:17 68:23 69:4 range 60:11 75:12 rate 53:21 69:14 rated 87:10 rates 54:25	rdr 1:25 98:20 reached 16:7 97:12 reaction 90:9 read 42:6,21 43:18 49:22 50:7 82:3 87:10 readily 54:17 reading 48:25 81:7 83:14 99:23 100:9 real 81:20 83:9 95:10 reason 5:15 7:21 38:12 61:7 72:23 79:1 83:11,16 84:8 85:7,13,24 101:6,9,12,15,18 101:21 reasons 33:8 recall 46:3,6 58:23 59:22 65:7 70:20 75:24 94:21 receive 29:6 39:22 87:1 received 42:18 receiving 37:13 recess 34:19 79:18 88:5 recognized 21:23 record 6:1 48:24 54:22 56:20 57:14 79:16 90:23 91:6 records 49:4 recruit 91:22 redistricting 22:23 22:25 23:4,10 45:14,22 72:6,10 72:19 73:9,21 86:24 94:17	reduced 98:10 refer 12:11 21:13 46:8 reference 12:12 55:14 67:16 75:10 referenced 43:5 99:6 references 15:9 referred 75:15 referring 20:11,12 27:22 28:12,24,25 41:3 42:24 44:14 44:15 45:7 57:10 61:17,24 62:16,20 63:23 64:5 66:24 67:6 74:1 75:25 76:2,5,16 77:10 refers 27:19 58:15 89:20 reflect 77:13,24 reflection 59:8 region 72:11 registered 2:19,20 registration 62:19 86:13,21 regulated 57:24 reiterating 50:6 relate 71:20 related 9:7 24:17 24:20 41:16 56:1 relations 44:16 57:12 92:5 relationships 29:2 relative 69:13 98:12,14 relatively 89:13 released 99:21 relevant 10:12 68:24 72:6,9,14 77:3 90:4,12 91:10,15 93:3,5,9
			reaches 16:7 97:12 reaction 90:9 read 42:6,21 43:18 49:22 50:7 82:3 87:10 readily 54:17 reading 48:25 81:7 83:14 99:23 100:9 real 81:20 83:9 95:10 reason 5:15 7:21 38:12 61:7 72:23 79:1 83:11,16 84:8 85:7,13,24 101:6,9,12,15,18 101:21 reasons 33:8 recall 46:3,6 58:23 59:22 65:7 70:20 75:24 94:21 receive 29:6 39:22 87:1 received 42:18 receiving 37:13 recess 34:19 79:18 88:5 recognized 21:23 record 6:1 48:24 54:22 56:20 57:14 79:16 90:23 91:6 records 49:4 recruit 91:22 redistricting 22:23 22:25 23:4,10 45:14,22 72:6,10 72:19 73:9,21 86:24 94:17	reduced 98:10 refer 12:11 21:13 46:8 reference 12:12 55:14 67:16 75:10 referenced 43:5 99:6 references 15:9 referred 75:15 referring 20:11,12 27:22 28:12,24,25 41:3 42:24 44:14 44:15 45:7 57:10 61:17,24 62:16,20 63:23 64:5 66:24 67:6 74:1 75:25 76:2,5,16 77:10 refers 27:19 58:15 89:20 reflect 77:13,24 reflection 59:8 region 72:11 registered 2:19,20 registration 62:19 86:13,21 regulated 57:24 reiterating 50:6 relate 71:20 related 9:7 24:17 24:20 41:16 56:1 relations 44:16 57:12 92:5 relationships 29:2 relative 69:13 98:12,14 relatively 89:13 released 99:21 relevant 10:12 68:24 72:6,9,14 77:3 90:4,12 91:10,15 93:3,5,9

[relevant - right]

<p>93:12 reliable 71:6,8 79:4 relied 18:14 40:17 95:22 rely 33:13 70:17 relying 50:24 remain 92:25 remedial 9:24 20:16 24:6 42:15 remember 14:6,19 15:4,11,15 16:10 16:13 17:7 19:5 39:1,15 57:16 75:16 78:7 80:14 80:17 87:13 95:13 remind 10:14 91:6 reminder 6:24 11:4 remote 8:2 remotely 1:23 5:3 repeat 6:15 18:24 23:7 25:19,19 45:17 48:6 74:16 rephrase 7:10 31:8 47:13 48:5,8 74:17 report 4:2 11:11 11:14 12:11,15,19 15:2 17:2,6 18:6 18:22 19:2,4,17,22 20:4 21:3,7,8,11 21:14,17 23:2 26:11 30:1,4,10,19 30:24 31:2,8,14,25 32:3,5,11,15,18,20 33:5,7,16,17 34:2 34:24 35:3,9,18,24 36:6 37:16 38:10 38:15,24 39:5,10 40:5,8,13,18 42:24</p>	<p>43:5,9,14 44:7,21 44:23,25 46:7,12 47:11,14,17 48:20 49:10 53:9,11 55:9,16,22 58:6,16 58:25 61:10 62:5 62:25 64:14,22,24 65:16,20 66:2,13 66:19 67:5,13 69:13 72:24 73:13 73:16 74:5 77:6,8 78:18,21 82:11 83:23 84:13,16 85:9,20 87:9 89:13,22 90:5,18 90:20,21 91:16 92:14,18 report's 46:10 reporter 4:5 5:24 6:9,16 19:8,10,19 97:7,15 98:4 reporter's 4:5 reporting 79:3 reports 33:20 41:19,22 43:7 75:14,20,21 represent 5:9 65:9 65:13 89:23 92:1 representation 49:7 51:2 53:19 68:11,18,19 74:2 74:12,12,19,20 77:13,24 79:25 representatives 1:18,20 2:20,23 50:14 68:1 represented 51:16 80:10,16 81:1 representing 12:23 13:2,9</p>	<p>represents 71:10 83:22 reproduced 11:21 republican 2:22 2:22,23 request 39:17 requested 100:1,9 100:10 require 52:8 56:17 81:18 83:7 95:8 required 51:8 requirement 86:16 requirements 92:22 requires 81:19 83:8 95:10 requiring 56:20 research 17:15,23 27:2,2 30:20 45:4 45:4 51:1 54:3,9 64:23 75:23 86:3 86:4 96:14 respected 91:21 respond 82:2 responding 8:11 response 90:10 rest 84:20 result 54:24 resume 59:20 resumé 26:7 27:16 28:13 29:6,19 59:15 retained 11:13 13:4 16:11,12,16 17:1 29:25 34:22 36:24 37:15 retainer 16:14,21 16:24 retention 4:6</p>	<p>return 99:17 100:6 reveals 54:22 reverse 84:4 review 14:8,16 30:7 40:5 41:18 41:22 49:21 50:5 51:2 62:5 75:14 81:3,24 84:16 87:13,15 99:8,10 99:13 100:2 reviewed 14:13,22 15:5 30:4 40:6 43:1 52:4 reviewing 43:21 reward 63:17 rican 90:10 ricans 27:18 ricardo 3:5 right 5:12 9:3 12:23 13:3,10 15:15 17:7 19:16 20:8,24 21:16 24:2,22 25:3 26:11 27:7,14 30:3,17,25 31:2 32:21 33:9 38:4,8 38:25 41:8,16 46:3,6,11,15,20 47:22 52:6 53:9 54:14,20 55:4,18 56:13 58:2,8,9,13 58:18,23 59:9 61:8,19,23 62:9,21 62:25 63:3,24 64:6,10 65:8,12,16 65:19 66:15 67:1 67:3 68:4,24 69:3 69:15,23 71:12,15 71:19,24 72:3 73:24 74:21 76:10</p>
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[right - similar]

77:10,25 78:6,19 79:6,19 80:5,8 81:1 83:23 84:24 85:5,22 87:18 94:11 95:15 97:8 rights 38:17 39:21 57:4 risk 8:22 rivera 2:20 rmeza 3:8 road 3:2 robert 1:8 rolls 49:21 52:4 62:18 romero 2:21 rose 1:4 roughly 17:12 91:24 rounds 64:3 rows 71:19 ruin 37:9 rules 5:22 31:25 32:9 100:8 run 54:25 69:9 79:9 rush 97:8 rutgers 2:3 26:8,9 ruth 66:8	save 82:6 saw 5:25 26:7 27:16 29:6 48:19 48:23 52:22 66:1 saying 6:20 11:19 50:2 52:3 73:20 89:7 91:7 says 9:23 20:4 21:19,23 43:21 44:10 49:3,20 56:5 57:2 63:14 67:7,8 78:21 81:13 83:24 95:5 96:5 schedule 99:10 scholar 21:19 22:12 26:21 51:2 51:9 scholz 1:7 school 27:5 61:5 87:5 schools 88:24 science 89:4 scope 23:2 86:2 90:22 screen 41:10 81:23 82:17,18,20 84:17 84:19 94:2 96:19 seal 98:16 seats 63:15 second 43:20 47:4 47:25 48:14 64:3 68:9 76:13,16,17 88:21 secondary 43:22 section 21:17 38:16 43:15 48:21 sections 46:21,22 46:25 sector 57:18	see 9:1 29:18 43:9 43:12 48:25 49:2 53:24 55:3 62:16 62:23 63:21 68:8 71:2 75:14 77:19 82:1,17,20,22 83:1 84:18 seeing 50:13 seen 53:2 65:7 79:2 senate 1:14,16 2:18,22 3:15,15 10:14,19 11:10,14 36:16,18 37:12,18 37:20,21,22,25 38:3,6,11,11,16,23 40:14 49:21 53:8 80:20,23 senator 81:4,8,9 83:21 94:1,19 95:16,22 96:2 senators 49:24 79:24 80:15 81:5 send 12:5 sense 6:10 62:15 91:10 sent 16:6 19:24 41:6 sentence 6:14 43:20 44:10,24 47:4 49:19 56:4 57:1 58:15 63:12 63:23 64:3 65:2 67:7 68:10 74:7 74:10 75:8,18 76:23 81:14 82:1 82:25 83:12,24 84:8 95:4,14 96:5 sentences 43:19 50:5,10 51:18 54:21 61:3 64:1	79:22 81:8 sentiment 89:21 separate 47:16 september 16:9 34:21 serious 56:21 served 29:23 serves 57:20 service 57:18 serving 50:15 setting 5:24 8:3 share 28:17,18 41:10 81:23 82:4 94:2 96:19 shared 32:14 sharing 82:18,19 84:17 sheridan 3:17 5:7 31:19 40:25 81:23 93:20,21 sheridan.caldwell 3:20 shooting 90:10 short 13:23 31:20 64:2 81:8 shorthand 98:9 shortly 16:13,15 show 41:2 side 12:10 sides 97:8 sign 99:16 100:5 signature 20:3,18 21:10 98:19 99:21 99:23,23 100:9 signed 16:14 20:17 20:19 significant 84:4 silent 8:20 similar 49:12 51:19 59:4 77:19 89:3
s			
s 1:10 2:6 4:1 101:3 sabbatical 26:24 28:13 salvador 2:21 sample 40:13 samuel 2:12 san 3:19 88:22 89:5 saucedo 13:22 16:6			

[simple - support]

simple 54:19 simpler 82:8 simply 10:25 14:14,22 23:7 40:2 51:1 59:7 67:14 68:25 77:18 site 53:2 75:7,9 sites 75:3 situation 13:8 skills 51:1 skimmed 42:22 slating 63:9,19 64:13 66:14,14 society 93:14 socioeconomic 93:14 solely 81:17 83:7 95:8 solidarities 28:14 solidarity 29:3 solutions 99:7 sorry 6:11,13 9:20 18:23,24 20:7 23:6 35:4 37:5,7 41:21 42:9 45:16 47:12 48:10,25 56:25 59:17 60:12 65:1,11 75:11 80:21 82:15,24 85:10,12 90:15 91:1,3 95:24 sort 28:5 30:12 39:17 43:17 44:17 44:19 46:20 47:9 74:9 sound 21:14 56:2 sounds 20:18 21:5 30:25 32:6 34:17 35:5 source 70:15 76:14,16,17	sources 14:25 15:1 15:5 33:10 40:23 43:22 64:9,13 73:6 79:4 south 2:9 spare 88:7 speak 6:3,5,7 13:12 41:25 97:14 speaker 1:17,19 3:9,15 64:5,8 speaking 8:9 special 51:19 specific 11:10 24:10 25:1 39:4 39:17,19 41:8 45:14 46:1,8 49:1 55:21 73:17 75:12 specifically 7:20 15:4,16 16:17 38:10 39:25 45:8 72:18 75:17 77:14 83:17 84:23 specified 60:18 specifies 58:17 specify 19:13 58:19 60:17 spend 19:3 spent 17:5,25 18:1 19:2 spoken 41:12,17 sponsored 58:2 sport 97:5 spring 2:9 st 3:18 stain 92:4 stand 30:24 start 41:21 47:12 59:20 89:12 starting 43:20 49:17 63:7	starts 61:14 62:17 63:8 83:2 state 1:6,12 31:6 44:17 45:5,15,23 45:23 46:5 49:21 49:24 50:13,16 51:3,5,16,23,25,25 52:4 53:2,19 57:21,24 58:2 61:5 64:17 77:15 77:23 79:24 80:13 80:21 85:16,21 86:21 87:5,11 98:4 99:4,9,12 101:1 state's 50:3 53:21 stated 67:15 98:10 statement 9:25 31:3,5,9 32:1 42:15 60:5 67:18 95:23 96:2 statements 55:3 states 1:1 91:19 statewide 77:13 78:6,15 stating 74:23 statistics 58:6 59:1 69:3 status 86:25 stemming 47:9 sticky 10:7 stipulation 99:20 stone 2:2 stop 84:17 96:18 strategies 67:9 strawn 15:20 16:1 street 2:9,14 3:6 90:6,8 streets 90:8 struggle 47:15	student 17:16,20 17:22 studied 89:2,4,5 studies 21:21 89:6 study 62:11 89:1 subheadings 46:21 subject 46:17,20 subjects 35:9 submission 10:3 submit 33:21 submitted 4:5 19:17,22 20:2 21:3,9 29:20 30:4 30:10 33:23 40:7 40:14 41:19,22 81:4 submitting 33:19 34:2 subsections 46:14 subsequent 62:24 91:22 subsets 71:19 substantiate 33:11 substantive 30:16 30:18 32:20 substantively 33:4 success 69:14 successful 69:9 suggesting 73:10 77:17 suit 58:12 suite 2:10,14 3:6 3:18 summaries 40:6 summary 22:9,11 35:4 43:8 supplementing 90:21 support 9:25 20:15 33:15 42:16 70:11 73:18 75:7
---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

[supported - treaty]

supported 69:21 supporting 49:13 supports 47:24 48:14 68:14 75:17 suppose 51:22 sure 7:5 8:3,20 9:11 11:6 12:14 13:5 19:1 23:9 24:18 25:21 26:20 31:6,8,22 37:5 41:4 43:10 45:18 45:20 48:7 50:21 50:23 51:17 52:22 52:23 54:15 70:12 74:17 76:9,11 82:10 83:1 84:10 84:14 85:6 87:9 87:17,22 93:23 94:3 surname 52:15,23 52:25 surnames 80:6 surprising 11:16 12:1 survey 68:13,22 70:2,11,17,22 71:2 71:6 surveys 54:12 sworn 5:3 66:9 98:7	takeaway 49:10 takeaways 43:11 48:20 taken 1:23 73:10 98:8 talk 12:12 45:6 66:14 talking 29:1 58:4 59:23 tantamount 58:12 task 35:22,23 teach 17:21 technicalities 13:8 tell 28:21 52:18 71:7 78:3 91:17 temporary 91:23 term 26:8 terms 14:15 87:11 test 38:4 testified 5:4 testimony 5:17 9:8 10:21 14:10,13,23 14:25 20:23 21:12 23:18 38:15 42:20 text 67:8 texting 8:7 texts 39:22,22 thank 5:10 6:18 10:4 12:17 18:19 22:7 23:23,25 26:4,5 28:21 29:5 36:14 37:3 41:9 57:15 62:15 68:6 79:17 88:12 93:17 97:1,4,6,15 thanks 82:14 thing 10:13 18:4 18:14 30:13 44:17 49:22 things 9:6 11:9 12:9 32:19 36:6	think 6:10 11:8,15 15:9 17:5 18:14 28:4,11 30:18 32:4 36:12 43:16 45:18 51:8,14 52:3,10 53:1,4,7 55:16 58:4,5,17,25 60:8,21 64:12 66:3,13,17 69:2,13 69:21 73:25 74:3 75:21 77:19 78:2 78:2,9,20 79:9 80:3,9 84:12 87:16 88:2,6,14 89:24 90:12,22 91:7 93:2,9 94:6,7 96:22 thinking 34:21 66:18 thought 41:7 thoughts 31:16 three 1:9 18:1 88:25 tied 93:5 ties 43:17 time 5:11 7:14,15 12:20,20 13:15,23 16:11 17:25 18:11 18:21 19:2,3 20:1 26:10 28:1,5,15 30:22 31:14 33:20 34:4 36:9,10,13 39:10,11 46:10,14 46:25 51:23 56:20 58:9 60:24 61:22 62:2 69:19 78:17 82:7 83:15 88:14 91:14 92:23 93:1 98:9 99:10,18,24 100:7	timeframe 36:4 timeline 46:22 times 12:11 14:1 71:11 91:21 title 38:14 62:20 titled 20:14,22 21:11,17 28:13 40:9 42:13 59:16 59:21 today 5:10,17 12:22 90:4 91:15 92:9,13 94:25 97:5 today's 13:13 told 10:20 56:5 97:14 top 9:15 20:24 38:14 43:9 79:22 94:9,11 topic 44:20 76:13 85:19 torre 2:21 torres 1:4 total 17:7 18:2 50:15 51:3 71:14 71:17,19,20,23 72:1,5,19,24 73:5 73:8,19,20 74:13 74:20 totality 38:4 touched 86:4 track 17:8 trailing 85:12 train 37:6 trained 22:20,24 transcript 37:9 99:6,8,10,13,13,21 100:2,2 treatment 92:1 treaty 92:21
t			
t 4:1 98:1,1 101:3 101:3 table 62:18,23 70:3,6,8 71:16 74:10 tables 76:3 take 7:13 31:20 34:4,9,15,15 37:8 75:1 79:5 83:15 87:14			

[tremillo - wordings]

tremillo 2:21	understand 7:8	94:19 95:5,16,22	52:9,20 60:25
tribune 15:6,10,12	12:4 16:21 18:23	96:2	62:8
67:6	32:12,17 34:23	villanueva's 81:8	wear 56:17
tried 35:11 40:22	37:14,17 78:23	violation 58:12	web 53:1
75:1	90:19 97:7	violations 59:6	website 80:13
true 78:8	understanding	violence 90:7	week 17:9
truthful 5:16	13:3 18:10 81:20	91:11	weeks 17:10
try 6:2,3,6,23,24	83:9 95:11	virtual 5:24	weigh 31:16 38:7
7:5,10	understood 6:22	visiting 26:21	weight 37:25
trying 23:25 69:18	37:19	vote 25:22,25	weird 59:18
78:12 79:8 82:6	unfair 74:6	55:13 72:12 86:25	welch 1:17 3:9,15
82:15 89:19	united 1:1 91:19	voted 25:18 54:24	went 14:23 27:4
turn 12:19 49:7	university 2:3	voter 2:19,20	60:22 88:18 89:18
96:14	17:20 26:9 27:1	62:19 86:12,20	whirlwind 97:3
turning 55:22	88:18,19,21	voters 25:25 87:1	white 25:25 61:15
56:24 61:11 63:6	updated 62:23	voting 18:3 29:1	62:7 69:14 92:17
68:7 69:17	uprising 90:6	38:17 39:21 55:11	wide 60:11
turnout 62:19	urbana 88:20 89:4	55:12 71:24 72:2	wier 3:10,11
turns 7:1 63:14	usc 75:23	73:1,1,4 78:22,24	wiervought.com
two 14:4 54:21	use 39:4 52:8 54:8	86:5,5,9,16	3:13
62:13 64:1 74:25	63:16 70:1,21	vs 99:4 101:1	william 1:8,9,9
75:19 80:20,23	73:5	w	willing 51:11
tying 93:2	useful 60:20	w 1:7 3:11	windy 27:17
types 25:6,14	usually 6:10 45:7	waived 99:23,23	winston 15:20
typical 22:11	v	waiving 99:20	16:1
typos 30:15	v 1:5	want 8:3 17:8 23:2	witness 1:23 2:1
u	vacancy 66:11	27:6 29:7 34:8	3:21 4:2 5:3 13:5
u.s. 91:24 92:5,6	various 21:25	45:20,24 57:11	23:14 34:9,13
92:20,25 93:6	43:24 44:12,14	61:21 62:19 69:20	37:3 79:14 97:6
u.s.c. 1:9	57:5 91:21	79:20 80:7 87:16	98:6,16 99:13,16
uc 89:5	vaught 3:10,11	90:15,23 93:21	100:2,5 101:24
uh 6:11,20,20	vega 2:12	94:18 97:11	witnesses 16:22
15:14 36:19 50:16	verbal 6:9,16	wanted 30:9,17	won 58:7 59:2
80:13 83:15	veritext 99:7,9,11	41:5 42:10 43:10	wonderful 88:24
unclear 7:1 23:15	version 21:2	68:6	wondering 68:12
underestimated	video 59:17 88:3	war 27:18,19,22	75:2,6
60:2	view 47:11,14,17	27:23 91:20	word 7:4 63:13
undergraduate	84:20	watkins 3:17 5:9	75:12
17:22 89:3	village 83:19,25	watson 1:10	worded 48:5
underlying 11:11	villanueva 81:5	way 10:6 14:21	wordings 11:20
	82:19 83:22 94:2	26:5 35:16 45:12	

[words - zoom]

words 30:12	young 90:11
work 7:22 17:1 18:20 30:23 70:22	z
worked 15:17 17:23	zoom 1:22 84:18
workers 91:23 92:11	
working 12:6 15:23 16:2,5 17:5 17:13,25 19:3 26:17 35:16	
works 13:24 27:25	
world 27:19,23 91:20	
worried 8:14	
wrap 31:23 87:16	
wraps 43:17	
write 31:14 34:24	
writes 83:22	
writing 19:2,4 35:18 82:1 98:11	
written 10:6 14:23 30:1	
wrong 78:3	
wrote 27:17 59:21 60:5	
x	
x 3:21 4:1 68:16 100:1	
y	
yeah 12:3 20:12 31:22 50:11 75:11 75:12 80:18 88:3 94:10,25 96:10	
year 26:20,25 28:13 59:10 65:23	
years 46:15 56:17 60:2 62:24 91:22	
yesterday 14:7	

Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

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THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS
COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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