

# **EXHIBIT 3**

Atkinson-Baker, a Veritext Company  
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IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION

**CERTIFIED COPY**

JULIE CONTRERAS, IRVIN FUENTES, )  
ABRAHAM MARTINEZ, IRENE PADILLA, )  
ROSE TORRES, LAURA MURPHY, )  
CRISTINA FLORES, JOSE ALCALA, )  
TROY HERNANDEZ, GABRIEL PEREZ, )  
IVAN MEDINA, ALFREDO CALIXTO, )  
HISPANIC LAWYERS ASSOCIATION OF )  
ILLINOIS and PUERTO RICAN BAR )  
ASSOCIATION OF ILLINOIS, )

Plaintiffs, )

-vs- )

No. 1:21-cv-3139

ILLINOIS STATE BOARD OF )  
ELECTIONS, IAN K. LINNABARY, )  
WILLIAM J. CADIGAN, LAURA K. )  
DONAHUE, WILLIAM M. MCGUFFAGE, )  
CATHERINE S. MCCRORY, RICK S. )  
TERVEN, SR. and CASANDRA B. )  
WATSON, in their official )  
capacities as members of the )  
Illinois State Board of )  
Elections, 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. )

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1 Q What staff member was that?

2 A Darrin Reinhart.

3 Q And did you say that person's first name was  
4 Darrin?

5 A Darrin with a D, yes.

6 Q For ease of purpose, man or woman?

7 A He is a man.

8 Q Man.

9 And so you and Mr. -- you worked with  
10 Mr. Reinhart with respect to Metro East, fair to say?

11 A Mr. Reinhart and I both worked with the members  
12 of the delegation, of the caucus to create this  
13 district, yes.

14 Q And which members are those?

15 A Representative Greenwood, Representative  
16 Hoffman, Representative Katie Stuart.

17 Q With Representative Stuart representing 112,  
18 Representative Hoffman representing 113, and  
19 Representative Greenwood representing 114?

20 A That's correct.

21 Q What, if anything, did Representative Stuart say  
22 to you or to Mr. Reinhart as to what her goals were with  
23 respect to district 112?

24 A I don't recall what specifically the goals that

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1 Representative Stuart had for her district.

2 Q What goals did you have? Did you or  
3 Mr. Reinhart identify any goals for district 112?

4 A First and foremost, the district needed to be  
5 drawn to equal population.

6 I think second of all keeping the Edwardsville  
7 base of that district together was important politically  
8 for Representative Stuart.

9 And then beyond that what could be done within  
10 reason to enhance the Democratic performance of the  
11 112th district.

12 Q And did you feel like you accomplished all three  
13 of those goals in HB2777?

14 A I would say that the -- in terms of population  
15 questions, we did that as much as -- using the best  
16 information we had.

17 With regard to the political questions, I would  
18 wait and see what the outcome of the future elections is  
19 to weigh in on that.

20 Q How about Representative Hoffman, did he  
21 identify goals that he had with respect to district 113?

22 A Representative Hoffman's goals were to maintain  
23 the Belleville senator of his district and as much as  
24 possible to be politically in a position where he and

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1           Q    Now, if you look at the bottom of page 4 and the  
2   top of page 5, it talks about the counties that lost  
3   population. And it indicates that St. Clair County lost  
4   the highest number of people.

5                   Do you see that, Mr. Maxson?

6           A    Yes.

7           Q    Do you have -- by the way, who was responsible  
8   for coming up with some of the data like this in Exhibit  
9   21?

10          A    I don't recall.

11          Q    Did it come out of your office?

12          A    I think parts of it came out of my office. I  
13   think parts of it might have come from analysis done by  
14   Kim Brace.

15          Q    All right. Do you have any doubt in reading  
16   this that St. Clair County was a county that lost the  
17   most population between 2010 and 2020 in Illinois?

18          A    No, I would defer to what's in the resolution.

19          Q    Okay. Now, with respect to district 112, that  
20   was a district that when you -- when you imported the  
21   2010 data, that district -- or the 2011 plan, that  
22   district was only underpopulated by a couple hundred  
23   people, right?

24          A    That seems to be correct, yes.

1                   Witness my official signature and seal as  
2   Notary Public in and for Cook County, Illinois, on this  
3   4th day of November, A.D. 2021.

4  
5  
6  
7                   *Tracy L Blaszak*  
8

9                   TRACY L. BLASZAK, CSR, CRR

CSR No. 084-002978

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