

EXHIBIT 3

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IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

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-)

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.)

CERTIFIED COPY

No. 1:21-cv-3139

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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.
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