

# **EXHIBIT 14**

*Excerpts of October 3, 2024, Deposition  
of Blake V. Springhetti*

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IN THE UNITED STATES DISTRICT COURT  
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

SHAUNA WILLIAMS, ET AL.,                    )  
  )  
                          Plaintiffs,                    )  
  )  
                          vs.                                    )  
  )  
REPRESENTATIVE DESTIN HALL,            ) Civil Action  
in his official capacity as            ) No. 23 CV 1057  
Chair of the House Standing            )  
Committee on Redistricting,            )  
ET AL.,    )  
  )  
                          Defendants.                    )  
  
NORTH CAROLINA STATE                    )  
CONFERENCE OF THE NAACP,            )  
ET AL.,    )  
  )  
                          Plaintiffs,                    )  
  )  
                          vs.                                    )  
  
PHILIP BERGER, in his official) Civil Action  
capacity as the President Pro ) No. 23 CV 1104  
Tempore of the North Carolina )  
Senate, ET AL.    )  
  )  
                          Defendants.                    )

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VIDEOTAPED DEPOSITION OF BLAKE V. SPRINGHETTI  
Thursday, October 3, 2024

- - - - -  
  
Videotaped Deposition of BLAKE V. SPRINGHETTI, called  
for examination under the Federal Rules of Civil  
Procedure, taken before me, the undersigned, Lori  
Litvin, a Notary Public in and for the State of Ohio,  
at the offices of Thompson Hine, LLP, Columbus, Ohio,  
commencing at 9:22 a.m.

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1 A In this same email there were incumbents.

2 Q Right.

3 A So I took into account the incumbent data --

4 Q Okay. So --

5 A -- in order to comply with -- one of these prongs

6 references incumbents.

7 Q Okay. So it was the guidance and then the

8 Congressional and the House incumbent information that

9 you had?

10 A Yes.

11 Q And did you see any prior drafts of this

12 guidance?

13 A No.

14 Q And you weren't provided any information about

15 this guidance before the October -- the August 23rd,

16 2023 email?

17 A No.

18 Q Do you know why these criteria were selected?

19 A No.

20 Q You didn't talk to anybody about why?

21 A No.

22 Q And you had no part in selecting any of these

23 criteria?

24 A Correct.

25 Q Are you aware of any public input taken on the

1 criteria?

2 A No, not aware if there were or were not.

3 Q Are the criteria listed in order of priority?

4 A I don't think so but I -- I don't know. I didn't  
5 draft this so.

6 Q And you weren't told to -- to consider the  
7 criteria in any sort of priority?

8 A The only time where that came up was when it came  
9 to count subdivision splits when -- because there are  
10 several cases geographically where in order to keep a  
11 VTD whole you might have to split a subdivision or if  
12 you -- and vice versa, if you're keeping a subdivision  
13 whole, you're splitting a VTD.

14 So, I don't -- I don't think this was necessarily  
15 in priority but that was the situation where it was  
16 relayed that in that scenario the VTD would be the  
17 priority.

18 Q So the choice to keep the VTD together was told  
19 to be a priority over splitting a subdivision?

20 A Yes.

21 Q Was there any other conversation about  
22 prioritization of any of these factors besides what you  
23 just mentioned?

24 A No. I -- I don't know if the drafter drafted  
25 these in priority or not. That's not information that

1 I was -- that was shared with me. I created them all  
2 equally.

3 Q Okay. So you treated them all equally. Can you  
4 tell me about how you did that? There are a lot of  
5 factors here so I'm curious about your process.

6 A Yes. So, you know, started with a blank map with  
7 just the county groupings that were -- that I was  
8 instructed to use and then --

9 Q Let me stop you there. When you said instructed  
10 to use, is that the 2022 House plan groupings that are  
11 listed here? I think that's on the fourth line.

12 A Yes. Yeah, four down.

13 Q Okay. So you used -- you started with a blank  
14 map and then you put together the county groupings  
15 based on the 2022 House plan?

16 A No. Based on the 2022 groupings and then drew a  
17 blank, drew from a blank slate from there.

18 Q Okay. Do you know whether this criteria is  
19 different than the criteria that was used in the last  
20 redistricting in North Carolina?

21 A I don't know if it is or isn't.

22 Q For the groupings it says that the groupings are  
23 sufficient. Did you consider any other groupings or  
24 did you just automatically decide that those were the  
25 groupings that you would use?



1 A I decided that the client instructed me to use  
2 these so I used those.

3 Q That's -- your interpretation of sufficient is  
4 this is what you should use?

5 A Yes.

6 Q Okay.

7 A And there was never any instruction otherwise, so  
8 ultimately the client was happy with that decision.

9 Q So you had no other conversations with the  
10 client, Chairman Hall, about the county groupings?

11 A No.

12 Q Did you have any conversations about the county  
13 groupings with anybody else?

14 A No.

15 Q So once it was decided, they were locked in?

16 A Yes. Those are the ones that we used.

17 Q Okay. So I want to walk through each of these.  
18 The first one is that the districts are to be drawn  
19 within plus or minus 5 percent of the ideal district  
20 population.

21 How did you determine the ideal district  
22 population?

23 A Well, I didn't actually have to do any other  
24 mathematical calculation because we were operating  
25 under the same census so that it's, I think, 86,995

1 plus or minus 5 percent of that.

2 Q Okay.

3 A I think is what the -- it's been a while but  
4 That's what is ingrained in my head, so.

5 Q Good memory. Is there any conversation you had  
6 with anybody about the ideal district population?

7 A No. Plus or minus 5 straightforward.

8 Q Okay. The second one -- and we're going to skip  
9 the second line, but the second criteria for the  
10 House, which is the third line, says: Draw House  
11 districts that are contiguous. Contiguity by a point  
12 is not permitted but contiguity by water is  
13 permissible.

14 What does "contiguous" mean, from your  
15 perspective?

16 A Yeah, it's -- there's -- the geography of the  
17 district all enjoined all together. There's no points  
18 of a district that did not connect to other parts of  
19 the district other than water.

20 Q Okay. And how did you come to understand that  
21 meaning?

22 A It's pretty straightforward. Similar case in  
23 Ohio. Point contiguity doesn't work and contiguity  
24 through water does work and you can't have  
25 non-contiguous districts.

1 Q Did you have any conversations with anybody about  
2 this particular criteria?

3 A No. It was straightforward.

4 Q All right. The next one is the county groupings  
5 which we talked about briefly: Draw House districts  
6 within county groupings as described by Stephenson and  
7 subsequent decisions by the North Carolina Supreme  
8 Court and the 2022 House plan groupings are  
9 sufficient.

10 So you said that you utilized the 2022 House  
11 County groupings, right?

12 A Yes.

13 Q It mentions here subsequent decisions by the  
14 North Carolina Supreme Court. Did you look into those  
15 subsequent decisions?

16 A No.

17 Q So you had no conversations about what those  
18 subsequent decisions said?

19 A No.

20 Q So with respect to the county groupings, you just  
21 used the 2022 groupings and didn't have any other  
22 conversations about the groupings themselves?

23 A Correct.

24 MR. STRACH: You all keep going.

25 I'll be right back. Keep going.

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1 Q The next -- the next criteria is that new  
2 districts will be drawn and the map drawer will not be  
3 bound by the location of prior district lines.

4 Did you rely upon any prior district lines?

5 A No.

6 Q Why not?

7 A I drew it from a blank slate.

8 Q And why did you decide to draw from a blank slate  
9 instead of using prior district lines?

10 A That's just what -- that's how I started and  
11 there was never an instruction to do anything other  
12 than that so I started from scratch.

13 Q So there was no instruction that said, you know,  
14 go take a look at this group of districts in this part  
15 of the state and, you know, shift things based on what  
16 you see there for any particular reason? It was a  
17 blank slate?

18 A Yeah. I used this -- yeah, I used this criteria.  
19 There wasn't a criteria to start from the 2022 map  
20 other than the groupings so --

21 Q Okay.

22 A -- I started from scratch.

23 Q The next one is data identifying the race of  
24 individuals or voters shall not be used in the  
25 construction or consideration of districts in the 2023

1 was much cleaner from that standpoint than, according  
2 to them, than previous maps that they had in North  
3 Carolina, so that's -- that's what they were happy  
4 with.

5 Q So they were happy with no splitting of VTDs,  
6 looked compact. Was there anything else that they  
7 mentioned or that you guys talked about with respect  
8 to the criteria?

9 A Well, there were split VTDs. Some of them were  
10 mathematically required to stay within the county  
11 grouping but yeah, I mean that's -- they were pretty  
12 happy with that.

13 Q Was there anything specific that they wanted you  
14 to do different than compared to what you had done  
15 leading up to that date?

16 A Well, I remember there being some districts that  
17 I drew that -- that they wanted to make changes in,  
18 but overall I think most of the map was they were  
19 pretty happy with.

20 Q What was the districts you remember that they  
21 wanted to make changes in?

22 A Well, there were some where, you know, like, I  
23 didn't see a way around not having two incumbents in a  
24 district without, you know, doing some things.

25 And that was one where they were, like, well, we

1 don't want -- even -- and I think it was even a  
2 Democrat. It wasn't even a member of their own  
3 caucus.

4 They were, like: Well, you know, you shouldn't  
5 do that, but it wasn't intentional. It was just the  
6 math was -- was required there.

7 Q When you say it wasn't intentional, you weren't  
8 intentionally trying to do that? You were just  
9 following --

10 A Right. Right. Yeah.

11 Q -- what the math --

12 A So it was just like stuff that, you know, I'm not  
13 going to know everything about the -- you know, I'm  
14 not from North Carolina. So just minor things like  
15 that.

16 Q Yeah, because I think you said earlier that, I  
17 mean, you don't really have an understanding of the  
18 political geography so that wasn't going into the map  
19 making.

20 You were really just following the criteria and  
21 using the numbers to come up with this initial draft?

22 A Right. Yeah. I mean, any political information  
23 I had was just these races that we inputted into  
24 Maptitude. These elections I should say.

25 Q Did you -- when you were showing this initial

1 draft to Chairman Hall, Representative Stevens, and  
2 the staff members at this second working group  
3 meeting, did you show them the political performance  
4 data for the draft?

5 A Yeah. So the political performance data, you  
6 know, is up on the screen in a spreadsheet like  
7 organization so they were able to see political  
8 performance.

9 Q And were changes made to that draft based on  
10 political performance?

11 A In some cases some of the -- some of the  
12 districts, you know, both -- in both directions.  
13 While this is a Democratic district, this is a  
14 Republican district, leaning -- Republican leaning and  
15 Democratic leaning, but yeah.

16 Q So what -- what do you recall from those  
17 instances in terms of what you were told with respect  
18 to partisan data? Were you told: Let's change this  
19 specific district so it is more Republican leaning or  
20 more Democratic leaning?

21 A Yes, there was some of that. There was some of  
22 that but I -- yeah, initially I just think it was more  
23 about incumbents and, you know, certain political  
24 subdivisions like -- and some of it was just, you  
25 know, oh, by rearranging these VTDs this subdivision

1     isn't split and we would make that up.

2             Some of it was just cleaning up the map, but  
3     yeah, there certainly was some -- partisan performance  
4     adjustments made as well.

5     Q     During that meeting were you making adjustments  
6     in the room during the meeting?

7     A     Yes.

8     Q     So it was kind of like active -- you were  
9     actively make changes while you were getting feedback?

10    A     Yes.

11    Q     Did you take any notes about those -- that  
12    feedback that you received during that meeting?

13    A     No. Just we would look at it on the screen. If  
14    it worked out, fine. If not, pull it out, reverse,  
15    and then restart.

16    Q     Okay. So you would test things out live during  
17    these meetings?

18    A     Yes.

19    Q     And then if it worked out, would you save that  
20    draft as like whatever, revised draft X?

21    A     Yeah. It would stay. Maptitude automatically  
22    saves so it would stay. It was a working version.

23    Q     So it would type, save, this was your working  
24    version in Maptitude, but did you save specific  
25    versions of drafts anywhere or was it just one ongoing



1 working draft that you used?

2 A So when I would, for example, go -- like in this  
3 trip we're talking about, it would be one working  
4 draft while I was there, two days, three days, four  
5 days, whatever it was.

6 And then I would take that back with me and  
7 continue to work on it in Columbus, and then whenever  
8 the next trip was that would be the next version.

9 So each -- basically each working session that I  
10 traveled that would be like, you know, V3 would be  
11 trip 3. I don't know what I actually called them.

12 Q Okay. So there weren't subsections within a  
13 working session? It was just the one working draft  
14 that you had in North Carolina based on the  
15 conversations that you had?

16 A Yeah. There -- there were some later in the  
17 process where, you know, I would bring like two  
18 different versions of like a four-county cluster or a  
19 four-county groupings and say: Here's one thing to  
20 consider; here's another thing to consider.

21 And then sometimes they went with neither and we  
22 would -- you know, or sometimes they would choose one,  
23 so, but.

24 Q Do you recall what those decisions were based on?

25 A Usually math. And when I say math, I mean just

1     trying to have the least splits and what math  
2     population allows us to do within the county groupings  
3     and incumbents where they live has a big part of -- of  
4     where a lot of these lines go to or manipulated, I  
5     guess, and then Partisan measurement.

6     Q     Was there a priortization of any of those three  
7     or were they balanced equally?

8     A     I say they were balanced equally, yeah.

9     Q     Do you have a specific recollection of adjusting  
10    in that first session, that first working session, of  
11    adjusting any districts in Northeastern North  
12    Carolina?

13    A     No. I don't -- I think most of the changes were  
14    in the more populated --

15    Q     So Wake?

16    A     -- areas. Yeah, but even in Wake -- yeah, I  
17    would say probably Wake and that number was the  
18    majority.

19    Q     What do you recall about the changes in Wake?

20    A     Those were the -- well, the geography there is  
21    pretty crazy the way the municipal boundaries are  
22    drawn. I mean, it's pretty puzzled up there.

23            So, you know, I would notice or the client would  
24    notice, you know, communities or political subdivision  
25    might be split that wasn't intended.

1           So we would go in and make those adjustments or  
2           just because of the geography is tricky there.

3           Q     So you would have split them without knowing and  
4           then Chairman Hall would have said: Hey, we can't --  
5           we can't do that here, we have got to -- we have got  
6           to readjust this?

7           A     Yeah or I would have noticed it and we would  
8           have -- he would say: Yeah, make that change. Or, we  
9           might have been looking at something else and I might  
10          have noticed that something needed to be adjusted.

11          But it was mostly that and then secondary to that  
12          probably, or maybe equal to, the partisan performance.

13          Q     Do you recall any specific changes in that first  
14          map to the Forsyth or Stokes area?

15          A     Yeah. Yeah, there were changes in Forsyth.

16          Q     What do you -- what do you recall about those  
17          changes?

18          A     Same thing there. What I recall in those areas  
19          is the incumbents live pretty closely to each other  
20          and so, you know, measuring not double-bunking,  
21          keeping communities together, political subdivisions  
22          together.

23          Those -- I remember those two pieces being a  
24          priority, and then also, like, you know, creating a  
25          Democrat-leaning district that the Democrat incumbent

1 actually lives in and not accidentally putting them  
2 together, because I remember the math there being  
3 tight and the geography where the incumbents lived  
4 being a challenge.

5 Q Do you have a recollection in that first session  
6 of a scenario where you had put together the districts  
7 and the political subdivisions were -- seemed okay, no  
8 splitting of VTDs, the math seemed good per how you  
9 have been describing the math population, but there  
10 was a recommended change solely based on partisanship?

11 A No. Not -- not in Forsyth.

12 Q Anywhere else on the map?

13 A Partisan measurement was included in some other  
14 areas, sure.

15 Q So what did you understand your -- strike that.  
16 Can you walk me through how a partisan  
17 performance adjusted -- adjustment would work?

18 So, if you pulled up the map and something was  
19 flagged by somebody that a certain district should be  
20 more Republican leaning because you could see on the  
21 map, right, the election data results, how did that --  
22 can you walk me through how that adjustment would be  
23 made?

24 A Sure, and it wasn't just making something more  
25 Republican. There was one district that I drew to be

1 Republican leaning, strongly Republican leaning, and  
2 it was a Democratic incumbent and I was instructed to  
3 make adjustments there based on partisan performance.

4 So, but, you know, it would be -- most of the  
5 partisan movement was very -- from the version that I  
6 brought to the version that I left with was very  
7 minimal. There wasn't --

8 I mean, we're talking like four tenths of a  
9 percent. It's not like one district went from 55  
10 percent Republican leaning to -- or I'll use even 47  
11 percent Republican leaning to, you know, 55 percent  
12 Republican leaning.

13 It might have went 47 percent Republican leaning  
14 to 47.6 Republican. I mean, it was very small --

15 Q And this is in terms of --

16 A -- partisan adjustment.

17 Q Sorry. Go ahead.

18 A Very small. There -- you know, the biggest --  
19 the biggest partisan adjustment that had the biggest  
20 actual mathematical partisan change was the situation  
21 I mentioned first which was I drew a very Republican  
22 district that had a Democratic incumbent in it and I  
23 was instructed to reformulate that county grouping  
24 because of that partisan.

25 Q Okay. Let's talk about that. Why did you draw

1 it that way?

2 A Why did I draw it that way? Well, you know, on  
3 my system I don't know which Republic -- which  
4 incumbents are Republican or Democrat; I just know  
5 that they're incumbents so I was just drawing  
6 districts.

7 Q And you didn't check it afterwards?

8 A Check to see whether the incumbent was Democrat  
9 or Republican?

10 Q Uh-huh.

11 A Well, I did during the working session with the  
12 client, yes.

13 Q So did the client flag to you that this was an  
14 issue before you knew it was an issue?

15 A Yes.

16 Q And who -- who flagged that for you?

17 A I don't remember if it was Chairman Hall or  
18 Representative Stevens, but I can tell you it was one  
19 of the two of them.

20 Q Okay. And what district was this?

21 A I don't remember the district number but it was,  
22 like in, I'll say central North Carolina, not western  
23 North Carolina, but somewhere in the middle of the  
24 State.

25 Q Chatham?

1 MR. STRACH: Chatham.

2 MS. MOLODANOF: Chatham.

3 Q Would it have been Chatham, North Carolina?

4 A I don't remember exactly --

5 Q Okay.

6 A -- the -- I -- it was in the center of the State  
7 pretty much.

8 Q Okay. Did that happen on any other occasion  
9 where you had drew a Republican-leaning district but  
10 you discovered later that there was a Democratic  
11 incumbent there?

12 A There could have been but that's the one that  
13 sticks out in my memory the most.

14 Q And it sticks out in your memory because it was  
15 the first one?

16 A No, because it was challenging to -- to -- to --  
17 just because in that county grouping the math was very  
18 tight. All the districts were very heavy, and so  
19 where the incumbents live and trying not to draw a  
20 heavily, heavily-Republican district for a Democratic  
21 incumbent, the math really is what made it pretty  
22 difficult to find a solution, but we found one.

23 Q So you mentioned that was a difficult district.  
24 Did you encounter other difficult districts either for  
25 that reason or different reasons?

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1       A       That one sticks out, and then, you know, trying  
2       to find different math to work for the districts that  
3       acquire VTD splits to stay within the county grouping.

4               You know, I'm just -- I didn't just accept it; I  
5       needed to split one, right, I would run -- run numbers  
6       to see if I could try to not split one but those were  
7       challenging too because there wasn't a mathematical  
8       solution otherwise.

9       Q       Were there specific areas that stick out to you?

10      A       The one that -- I forget the county -- but  
11      there's a -- it's in, I guess, the southeastern part  
12      of the state. It's a two-county grouping and there's  
13      two districts in there and you need to split a VTD in  
14      order to make it work.

15              That's the situation where the math is difficult  
16      in the other direction. It's very light in  
17      population. So I tried to find another solution but  
18      there was not one.

19      Q       So what did you understand your deadline to be in  
20      terms of the map drawing?

21      A       So, previously I had mentioned that we had sort  
22      of set some days from August to October so my deadline  
23      would be the next time I went back.

24      Q       Your deadline -- so it was the expectation that  
25      you would show up with a fresh draft to be reviewed?



1 Q So it's gone down from 68.8 by quite a bit and  
2 then for black voters it's 30.2 percent which is  
3 almost doubled from what was -- what remained in 35.

4 And then down below you see that Republican votes  
5 for President for 2020 is 45.6 which is .1 percent  
6 difference. Essentially the same.

7 So this change -- based on this information, this  
8 change did not result in an increase in a Republican  
9 leaning district, is that right?

10 MR. STRACH: Objection. Go  
11 ahead.

12 A I don't -- so this is the first time I'm seeing  
13 this so I don't know if that's the case or not.

14 Q Let's assume that the data shared in these  
15 numbers are correct for purposes of my questions. The  
16 result of splitting this VTD did not increase  
17 Republican -- did not make a -- did not make Wake --  
18 or did not make House district 35 a more Republican  
19 leaning district, is that right?

20 MR. STRACH: Objection. Go  
21 ahead.

22 A Again, I don't -- I -- I don't know the  
23 underlying analysis of this and what the layers were,  
24 so I can't say empirically.

25 Q If it's just based on what we're looking at right

1 now -- so this is -- this is all -- I realize I have  
2 given you, you know, a limited set of information and  
3 this information is data that was pulled from DRA  
4 based on the -- the map, the map changes, between Meck  
5 V2 and then the money sign map, the percentage of  
6 votes for the Republican candidate and President, for  
7 President of 2020, did not change virtually. Does  
8 that look right?

9 MR. STRACH: Objection.

10 Q Is that what you're seeing?

11 MR. STRACH: Objection. Go  
12 ahead.

13 A I don't -- I don't know all the underlying data  
14 in this analysis.

15 Q So the only difference -- differences -- between  
16 Wake County between Meck V2, the map Meck V2, and the  
17 money sign map, was the split VTD and the split VTD  
18 resulted in cutting out a significant number of  
19 black -- of black people -- double the amount of black  
20 voters that were in the precinct beforehand?

21 Do you see that on the -- does that -- does that  
22 track what I'm -- what you're seeing in this exhibit?

23 MR. STRACH: Objection.

24 A So, again, I don't know the underlying data in  
25 this analysis and I didn't use racial data so I --

1 Q So I'm trying to understand if you did not use --  
2 you did not consider race in this decision, right,  
3 because you did not use racial data?

4 A I did not use racial data.

5 Q And the result of this decision did not influence  
6 partisanship in this district. So I'm trying to  
7 understand what the thinking was for this change given  
8 the result it has on black voters.

9 MR. STRACH: Objection. Answer  
10 if you can.

11 A I can't say one way or the other. I didn't use  
12 racial data. I don't understand the underlying  
13 information in this analysis. First time I'm seeing  
14 it, so.

15 Q So do you know why you would have split this VTD  
16 when, I mean, we have been talking now for -- for a  
17 while and I think one of the themes of your map  
18 drawing has been that you wanted to keep VTDs whole.

19 Is there a reason that you would have split this  
20 VTD?

21 A I don't remember a specific reason. I don't -- I  
22 don't recall the -- the math or the percent deviations  
23 of the surrounding districts.

24 I know that the math in Wake County is pretty --  
25 pretty tight, but I don't remember a specific

1 directive from the client.

2 Q So just for another point of reference, the  
3 population deviation percentage between House District  
4 35 or in House District 35 between Meck V2, in Meck V2  
5 it was negative 1.92 percent and in the money sign map  
6 for District 35 the percent deviation was negative  
7 4.48 percent. So, significant change there.

8 And this is -- this is based on the underlying  
9 shape files that were provided to us that we put into  
10 Maptitude to get some numbers.

11 So, this decision was not to keep VTDs -- a VTD  
12 whole, right?

13 A Again, I don't remember this specific directive  
14 for this.

15 Q BUT it couldn't have been because you split a  
16 VTD.

17 A This VTD is split, yes.

18 Q So it could not -- the decision could not have  
19 been because you wanted to keep this VTD whole, it  
20 also could not have been because you wanted to  
21 decrease population deviation given the shift and THE  
22 increase, is that right?

23 MR. STRACH: Objection.

24 A Again, first time seeing this. I will say seeing  
25 this zoom in, I mean, I think the district looks more

1 compact. I mean, that's a long stringy VTD.

2 So I think both the -- the 66 District and the  
3 35th District look more compact. That's a long VTD  
4 geographically.

5 Q So we were talking earlier about how VTDs and  
6 different political subdivisions look different in  
7 North Carolina and how that's been your focus and  
8 sometimes that has been a priority over compactness  
9 because you want to keep VTDs together.

10 So I'm -- I'm trying to square this decision with  
11 the conversation we have had just to understand what  
12 was the -- what was the change here based on?

13 A I don't recall a specific decision or directive  
14 here, but like I said, observationally it looks -- it  
15 makes both districts look more compact.

16 Q So visual compactness is one reason that you  
17 could think for this change. Is there anything else?

18 A I don't have any recollection of a specific  
19 directive.

20 Q Is it your recollection that this change would  
21 have been made as a result of a conversation with  
22 Representatives Hall and Stevens?

23 A Well, could you remind me again what version --  
24 what date version this comes from?

25 Q The change happened in the money sign map which

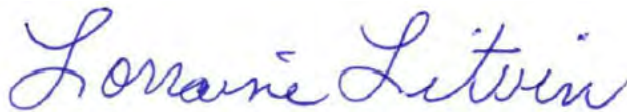
1 The State of Ohio, )  
 ) SS: CERTIFICATE  
2 County of Cuyahoga. )  
3

4 I, Lorraine A. Litvin, Notary Public within and  
for the State of Ohio, duly commissioned and  
qualified, do hereby certify that the within-named  
5 BLAKE V. SPRINGHETTI, was by me first duly sworn to  
testify the truth, the whole truth, and nothing but  
6 the truth in the cause aforesaid; that the testimony  
then given by him/her was by me reduced to stenotypy  
7 in the presence of said witness, afterwards  
transcribed on a computer, and that the foregoing is a  
8 true and correct transcript of the testimony so given  
by him/her as aforesaid.  
9

10 I do further certify that this Deposition was  
taken at the time and place in the foregoing caption  
specified and was completed without adjournment.  
11

12 I do further certify that I am not a relative,  
employee of, or attorney for any of the parties in the  
above-captioned action; I am not a relative or  
13 employee of an attorney for any of the parties in the  
above-captioned action; I am not financially  
14 interested in the action; I am not, nor is the court  
reporting firm with which I am affiliated, under a  
15 contract as defined in Civil Rule 28(D); nor am I  
otherwise interested in the event of this action.  
16

17 IN WITNESS WHEREOF I have hereunto set my hand  
and affixed my seal of office at Cleveland, Ohio, on  
this 24th day of October, 2024.  
18  
19  
20  
21

22   
23

24 Lorraine A. Litvin, Notary Public  
in and for the State of Ohio.  
My commission expires August 4, 2026  
25