

EXHIBIT 5

Soto Palmer, et al.

v.

Hobbs, et al.

* * * * *

Deposition Upon Oral Examination of
Matthew J. Bridges
December 9, 2022

* * * * *

REPORTED BY:

LAKESIDE REPORTING

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Matthew J. Bridges

December 9, 2022

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UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON

SUSAN SOTO PALMER, et al.,

Plaintiffs,

v.

STEVEN HOBBS, in his official
capacity as Secretary of State
of Washington, and the STATE OF
WASHINGTON,

Defendants,

and

JOSE TREVINO, ISMAEL G. CAMPOS,
and State Representative
ALEX YBARRA,

Intervenor-Defendants.

No. 3:22-cv-05035-RSL

DEPOSITION UPON ORAL EXAMINATION OF

MATTHEW J. BRIDGES

Friday, December 9, 2022

8:59 a.m. to 2:39 p.m.

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1 December 9, 2022, Seattle, Washington:

2 PROCEEDINGS: 8:59 a.m.

3 MATTHEW J. BRIDGES,

4 having been sworn/affirmed on oath to tell the truth, the
5 whole truth, and nothing but the truth, testified as
6 follows:

7 E X A M I N A T I O N

8 BY MS. WAKNIN:

9 Q All right. Good morning, Mr. Bridges. My name is
10 Sonni Waknin. I'm from the UCLA Voting Rights Project,
11 and I represent the plaintiffs in this case; and I'm going
12 to be asking you a few questions today.

13 A Okay.

14 Q So I'm going to ask you first if you could state
15 your full name for the record.

16 A Matthew James Bridges.

17 Q And this is a deposition being taken based on your
18 role in the 2021 redistricting of Washington.

19 Do you understand that?

20 A I do, yes.

21 Q Okay. Have you ever been deposed before?

22 A I have not.

23 Q Okay. So I'm going to lay out some ground rules for
24 you for this deposition.

25 Does that sound okay to you?

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1 A It does, yes.

2 Q Okay. So we're going to have an informal and
3 professional conversation; and as informal as our
4 discussion will be, you do understand the importance of
5 telling the truth; correct?

6 A Yes.

7 Q And you understand you were given an oath today to
8 tell the truth. You just were sworn in. And that has the
9 weight as if you were telling this testimony before a
10 judge in a court.

11 A Yes.

12 Q Do you understand that?

13 A Yes, I understand that.

14 Q Okay. If there comes a point today where the
15 lawyers in this case or the judge determines that
16 something you told us today isn't true, you understand you
17 can be called to task for that?

18 A Yes.

19 Q Okay. So I'm going to ask maybe some rude
20 questions, but bear with me. I just have to ask.

21 Are you on any medication that may impair your
22 memory or brain function today?

23 A I am not, no.

24 Q And do you have any conditions that may impair your
25 memory or brain function?

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1 A No.

2 Q Are you taking any substances that could impair your
3 memory or brain function?

4 A No.

5 Q And is there a reason why you cannot give truthful
6 answers to my questions today?

7 A There is not, no.

8 Q Okay. So you might hear some of the attorneys
9 object in this case. If your attorney objects or another
10 attorney objects, that objection will be noted for the
11 record, but you must still answer the question unless you
12 are instructed otherwise by your attorney.

13 Do you understand that?

14 A I understand.

15 Q Okay.

16 MR. HOLT: And Sonni, if I could jump in
17 real fast, just to get on the record that we're going
18 to agree an objection --

19 MS. WAKNIN: The one for all?

20 MR. HOLT: An objection by one is one for
21 all. Everyone agree with that?

22 MS. WAKNIN: Yes, that's fine.

23 MR. HOLT: Awesome.

24 MS. FRANKLIN: No objection from the State.

25 Thank you.

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1 Q (By Ms. Waknin) So if you need to go to the restroom
2 or tend to something immediately, you are allowed to take
3 breaks. So I just ask that you don't have a question
4 pending or you don't ask to take a break in the middle of
5 a question, but you finish answering the question and then
6 you can ask for a break.

7 Do you understand that?

8 A I understand that, yes.

9 Q Okay. And do you understand that you are having
10 your deposition taken today in response to a subpoena that
11 was sent to your attorney?

12 A I do, yes.

13 Q Okay. So you're the only person that knows if you
14 understand the questions that are being asked. If you
15 answer the question or don't say anything about the
16 question, I'm just going to assume you understood the
17 question.

18 Is that fair?

19 A Yes.

20 Q Okay. But you do understand that you can ask for a
21 clarification of a question?

22 A I do, yes.

23 Q Okay. And so I'm going to just ask you to remember
24 to give verbal answers for the court reporter. The court
25 reporter has trouble with head shakes, with nonverbal

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1 answers like um-hmm or yeah, so I just ask that you give
2 very clear verbal answers.

3 Do you understand?

4 A I do, yes.

5 Q Great. And finally, it's important to talk slow so
6 we're not talking over each other at the same time so that
7 the court reporter can take down everything that's being
8 said to establish a clear record.

9 Is that okay?

10 A Yes.

11 Q Okay. So -- Oh, and an important question,
12 Mr. Bridges, how do you like to be addressed?

13 A Matt is fine.

14 Q Okay, Matt. So Matt, do you believe the issues in
15 this case are important?

16 A Yes.

17 Q Why do you think the issues in this case are
18 important?

19 MS. GOLDMAN: Objection, calls for
20 speculation.

21 Q (By Ms. Waknin) You may answer.

22 A I believe that the implication of the Voting Rights
23 Act is -- It's an important federal law, and it's
24 important that it be followed.

25 Q All right. Matt, how did you prepare for your

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1 deposition today?

2 A I reviewed some of the work that I did during the
3 time, including maps and some of the emails that I sent.

4 Q Do you have any documents in front of you right now?

5 A I do not, no.

6 Q And Matt, do you have any applications open in which
7 you can be communicating with someone right now?

8 A Outside of this Zoom I do not, no.

9 Q How else did you prepare for this deposition today?

10 A I met with my attorney a couple times, Jessica
11 Goldman.

12 Q Are you represented by anyone else?

13 A I am not, no.

14 Q How many times did you meet with your attorney?

15 A Twice.

16 Q How long were those meetings?

17 A The first meeting I believe was about an hour. The
18 second was about 30 minutes.

19 Q Did you speak to anyone else besides your attorney
20 about this deposition today?

21 A Not in any substantive way. I did -- Adam Hall, who
22 is also being deposed next week, and I chatted just
23 briefly about just the logistics of getting to Summit Law
24 Group and that kind of thing, but no material
25 conversations, no.

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1 Q Did you speak with anyone else about the deposition
2 today?

3 A No.

4 Q Have you read the pleadings in this case?

5 A I have not, no.

6 Q Are you familiar with a different lawsuit that was
7 filed against the enacted version of Legislative District
8 15, Garcia versus Hobbs?

9 A I am aware of the lawsuit, yes.

10 Q And what is your understanding or awareness of that
11 lawsuit?

12 A It's fairly minimal, other than a sitting State
13 Legislator is representing the plaintiffs, I believe in
14 that case, and it addresses similar issues but from a
15 different perspective.

16 Q And do you understand that today you are being
17 deposed in relation to Soto Palmer versus Hobbs, --

18 A I do, yes.

19 Q -- which is about --

20 Okay. And do you know that the Soto Palmer v. Hobbs
21 case is alleging a violation of Section 2 of the Voting
22 Rights Act?

23 MS. GOLDMAN: Objection, calls for
24 speculation.

25 A Yes, that is my understanding.

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1 Q (By Ms. Waknin) Have you discussed the Soto Palmer
2 versus Hobbs case with anyone?

3 A Not that I can recall, no.

4 Q The trial in this case is currently set to start
5 May 1st, 2023. As of right now can you foresee any reason
6 why you would be unavailable during the week of May 1st?

7 A The only -- If the Legislature went into special
8 session it would be difficult for me to make that, but if
9 the Legislature adjourns on time I don't believe so.

10 Q Okay. And then would you then be available the
11 second week of May, possibly, 2023?

12 A I believe I have a vacation that starts I want to
13 say it's May 11th, but before that I would be available.

14 Q Okay. So it's my understanding that you were
15 involved in the 2021 redistricting cycle in Washington
16 state; is that correct?

17 A That is correct, yes.

18 Q When did you first get involved in Washington
19 redistricting?

20 MS. GOLDMAN: Objection, vague.

21 A I would -- Late 2019 I would say is when I first
22 started to think about the process.

23 Q (By Ms. Waknin) And what happened after 2019 when
24 you -- between when you were thinking about the process?

25 MS. GOLDMAN: Objection, vague.

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1 A So I started drawing trial maps more kind of in my
2 own free time and also teaching myself GIS to be able to
3 do different types of mapping, and then --

4 I was not involved in commissioner selection, but
5 after commissioner selection I began the more formal work
6 as caucus staff working with redistricting.

7 Q (By Ms. Waknin) In 2019 who were you employed by?

8 A The Senate Democratic Caucus of Washington State.

9 Q And why did you teach yourself GIS during that time?

10 A In anticipation of redistricting.

11 Q Did you want to be staff on redistricting?

12 A I did, yes.

13 Q Why did you want to be staff on redistricting?

14 A I have a fascination with maps and data, and I knew
15 that there were roles in the caucus for that type of work.

16 Q When did you get hired to work on the 2021
17 Washington redistricting?

18 A I don't know that there was a formal moment when my
19 supervisor said yes, but I would estimate early 2020.

20 Q Who was your supervisor at that time?

21 A Paulette Avalos was the chief of staff.

22 Q And you said that you were put on redistricting in
23 2020; is that correct?

24 A Roughly, yes.

25 Q What happened after commissioners for the Washington

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1 redistricting cycle were selected?

2 MS. GOLDMAN: Objection, vague.

3 A Initially not very much because that happened during
4 the beginning of legislative session, and so the 2020
5 legislative -- or I guess it would be the 2021 legislative
6 session was just beginning; and that was a long session,
7 so that lasted until near the end of April.

8 And so during that time I believe the commissioner
9 and Ali O'Neil were meeting with members and with
10 advocates. My role was very limited, though, until the
11 session ended.

12 Q (By Ms. Waknin) How long is the redistricting cycle
13 in Washington, to your knowledge?

14 A Well, in theory it lasts from commissioner selection
15 until November 15th of the odd numbered year, and so
16 commissioner selection being typically January of in this
17 case 2021, and then the map -- The maps should be approved
18 by November 15th, 2021.

19 And then the Legislature has, you know, a small role
20 in -- Minor modifications to the map are possible in the
21 first 30 days of session, the session following.

22 Q Okay. So you would say in 2021 -- or strike that.

23 Is it fair to say in 2021 the redistricting cycle
24 was from January, 2021 to November 15th of 2021?

25 A I don't think that there is a defined start date,

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1 but I think that is a fair estimate of it, yes.

2 Q Okay. And what was your role in the 2021
3 redistricting cycle in Washington?

4 A I was assisting the Democratic -- the Senate
5 Democratic Caucus and the commissioner appointed by the
6 Senate Democrats in proposing maps, evaluating map
7 options, attempting to incorporate testimony from the
8 public into map proposals, and working on compromises
9 toward a final map at the -- you know, at the end of the
10 process.

11 Q So how would you characterize your role in
12 assisting -- Is it Commissioner Walkinshaw?

13 A I was working with Commissioner Walkinshaw. I guess
14 I don't know -- I don't know how I would characterize it.
15 It's very much data and map focused was my work then.

16 Q Would you call yourself one of the map drawers for
17 Commissioner Walkinshaw?

18 A Yes, I think that's fair.

19 Q So how you characterize your role was assisting
20 Commissioner Walkinshaw and the Senate Democrats to
21 propose, evaluate maps, and to incorporate testimony from
22 the public in maps; is that correct?

23 A Yes.

24 MR. HOLT: Objection to form.

25 Q (By Ms. Waknin) Is there any other duties you had

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1 in assisting Commissioner Walkinshaw during that time?

2 A No.

3 Q Who were you employed by during the redistricting
4 cycle while you were assisting Commissioner Walkinshaw?

5 A Again, the Washington State Senate, and specifically
6 the Senate Democratic Caucus.

7 Q Why were you selected to assist on redistricting?

8 A I believe my supervisor believed I had value to add
9 in the process, I suppose.

10 Q And what was that value to add to the process, in
11 your opinion?

12 A The ability to analyze data and to incorporate it
13 into maps.

14 Q Can you explain to me what you mean by analyze data
15 and incorporate it into maps?

16 A Well, for example, this process was the first cycle
17 we had -- Prisoner reallocation was part of the statute in
18 Washington state. This was the first redistricting cycle.

19 And so understanding the implications of populations
20 being moved out of areas where people are incarcerated and
21 into the areas of last known residence, for example, and
22 how that would play out in districts across the state.

23 Q Is there anything else that you would analyze when
24 it came to map drawing?

25 MS. GOLDMAN: Objection, vague.

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1 A Yes. There are any number of things. There's
2 election data, demographic data, any type of data that can
3 be mapped. We did work with percentage of people renting
4 versus homeowners owning homes -- essentially data
5 available in the American Community Survey.

6 Q (By Ms. Waknin) Do you have formal training in data
7 analytics?

8 A No. Well, I majored in statistics in my undergrad,
9 but no, not data analytics specifically.

10 Q So you would say that you have experience, though,
11 with analyzing data in terms of statistical analysis?

12 A Yes.

13 Q Who did you work with during the redistricting
14 process?

15 A My primary points of contact were Ali O'Neil,
16 Adam Hall and Adam Bartz. And --

17 Q Who is Ali O'Neil?

18 A Ali O'Neil was a temporary hire by the Senate
19 Democratic Caucus. Her sole focus was on redistricting.

20 Q And were there other people that you worked with
21 primarily during the redistricting process?

22 A To a lesser extent Brady Walkinshaw, but -- And then
23 I had meetings with, for example, the House Democratic
24 Caucus, both the commissioner and staff people there, but
25 I wouldn't characterize it as working with them.

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1 Q Who is Adam Bartz?

2 A Adam Bartz is a staff person for the Washington
3 State Senate Democratic Campaign Committee.

4 Q Does Adam Bartz then work outside of the State
5 Legislature?

6 A That's correct. He is not employed by the state.

7 Q What did Adam Bartz do in the redistricting process?

8 A He and I worked together I would say on the map
9 drawing. He was -- He provided a lot of input in terms of
10 neighborhood cohesion and sort of the on the ground level
11 of understanding of cities and neighborhoods.

12 Q How would you define neighborhood cohesion?

13 A It can be any number of things -- based on major
14 highways or roads, based on democratic data, income data.
15 I don't know that there's one definition that fits for any
16 given place.

17 Q Would you describe Adam Bartz as a boss?

18 A No. I suppose colleague, although we were
19 obviously, as I said, employed by different people.

20 Q And who is Adam Hall?

21 A Adam Hall is a permanent staffer for the State
22 Senate and the Senate Democratic Caucus.

23 Q To your knowledge what does Adam Hall do?

24 A He staffs, as I do -- In his typical job he staffs
25 policy committees for the -- for the caucus in the State

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1 Senate, and his committees I believe are Law and Justice
2 and the State Government Committee.

3 Q So before the redistricting cycle started, to your
4 knowledge did Ali O'Neil, Adam Bartz or Adam Hall, were
5 they familiar with the Voting Rights Act?

6 MS. GOLDMAN: Objection, calls for
7 speculation.

8 MS. FRANKLIN: Objection, compound.

9 Q (By Ms. Waknin) You may answer.

10 A I believe that Adam Hall was, yes. And I am -- I
11 believe that all of us were aware of the Voting Rights
12 Act. I would only characterize Adam Hall as having
13 potentially a deeper knowledge of it.

14 Q And why do you say that Adam Hall had a deeper
15 knowledge of the Voting Rights Act?

16 A Because of his role for the caucus on the State
17 Government and Elections Committee. It's part of his
18 permanent job.

19 Q Do you know if Adam Hall is a lawyer?

20 A He is, yes.

21 Q You stated that to a lesser extent you worked with
22 Brady Walkinshaw. Can you describe that relationship?

23 A Brady provided input on the maps at times, but he
24 focused more on the interactions with both the public and
25 the sitting congress people and senators, and so my

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1 interactions with him were more limited because he was
2 doing that side of the work.

3 Q Did you communicate with other commissioners during
4 the 2021 redistricting process in Washington?

5 A Yes.

6 Q Who did you communicate with?

7 A April Sims.

8 Q Did you communicate with anyone who worked for
9 April Sims during the 2021 redistricting process?

10 A Yes.

11 Q Who did you communicate with?

12 A Osta Davis and Dominique Meyers for sure. I don't
13 believe anybody else, but I can't promise that.

14 Q What was the nature of your communications with
15 April Sims?

16 A They were -- They tended not to be terribly
17 substantive. Typically we were in meetings together. I
18 believe we only directly interacted once.

19 Q Are you -- Is there someone that you're looking at?

20 A Oh, no. I'm thinking.

21 Q Okay. What was the nature of your relationship with
22 Osta Davis?

23 A Relatively limited. We did maybe three or four
24 meetings together comparing ideas on maps, and then we
25 also I'm sure exchanged emails and things of that nature.

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1 Q Can you elaborate on what you mean by ideas on maps?

2 A So one of the big areas that we had a lot of
3 discussions on was whether to have legislative and
4 congressional districts cross the Cascades at Highway 2 or
5 I-90 was one of the issues that came up quite frequently.

6 Q Did you have conversations about the Yakima Valley
7 area in Washington when you had ideas on maps?

8 MS. GOLDMAN: Objection, vague.

9 A I cannot recall for sure with Osta.

10 Q (By Ms. Waknin) Did you ever have conversations
11 with Osta Davis on the Legislative District map about the
12 Yakima Valley area?

13 A I cannot recall.

14 Q And what was the nature of your relationship with
15 Dominique Meyers?

16 A We have a much more long-standing relationship
17 because she is also a permanent employee of the
18 Legislature, you know, for the House of Representatives,
19 working with the House Democratic Caucus, so -- And she
20 staffs -- has in the past staffed committees that are
21 analogous to the committees I staff, and so we've worked
22 together on bills and that type of thing.

23 She stepped in in a larger way into the
24 redistricting process part of the way through in June, I
25 would estimate, of 2021, and so it was at that point that

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1 I started interacting with her on redistricting as well.

2 Q Did you have conversations with Dominique Meyers
3 about the Yakima Valley area for the Legislative District
4 map?

5 A I do not believe we had any one-on-one
6 conversations. She was definitely in meetings where the
7 topic came up that I was also in, yes.

8 Q When were those meetings?

9 A I would estimate beginning in July or August, that
10 timeframe, and running -- It was a topic that came up on
11 a, you know, regular basis between then and November.

12 Q And who attended those meetings?

13 A Combinations of April Sims, Brady Walkinshaw, Dom --
14 Dominique, Osta, Adam, Adam, Ali and myself primarily. I
15 may be missing someone, but those would be the people, the
16 principals.

17 Q When you talk about Ali O'Neil, Adam Bartz, Adam
18 Hall and yourself, would it be fair to say that you were
19 part of the Walkinshaw team?

20 A I think that's a fair characterization, yes.

21 Q So when I say the Walkinshaw team, would you
22 understand it to mean Ali O'Neil, yourself, Adam Hall and
23 Adam Bartz?

24 A Yes.

25 Q How would you describe your working relationship

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1 with Commissioner Walkinshaw during the redistricting
2 process?

3 A Frustrating.

4 Q Can you tell me why it was frustrating?

5 A He was less engaged in the process than I would have
6 liked.

7 Q And can you explain to me what you mean by he was
8 less engaged in the process?

9 A He did not set aside very much time to review map
10 proposals, staff conversations about what was important or
11 not important in the -- to have in the maps.

12 Our meetings were frequently interrupted by other
13 business that he attended to.

14 Q To your knowledge were other commissioners more
15 engaged in the process than Commissioner Walkinshaw?

16 MS. GOLDMAN: Objection to form.

17 MS. FRANKLIN: Objection.

18 MS. GOLDMAN: Calls for speculation.

19 MS. FRANKLIN: Lacks foundation.

20 A I don't think I would have any insight one way or
21 another.

22 Q (By Ms. Waknin) You stated you worked with
23 Commissioner Sims; is that correct?

24 A Minimally, yes. We did have interactions, yes.

25 Q In your opinion do you think Commissioner Sims was

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1 more engaged in the redistricting process than
2 Commissioner Walkinshaw, from your experiences with her?

3 MS. FRANKLIN: Objection. Lacks
4 foundation.

5 MS. GOLDMAN: Calls for speculation.

6 Q (By Ms. Waknin) You can answer.

7 A It would be my guess that she was more engaged, yes.

8 Q And why would you guess that?

9 A Mostly a lot of the press that has come out since
10 the Redistricting Commission completed its work seems to
11 indicate that she was more involved.

12 Q Do you mind telling me what press you're thinking
13 about?

14 A The press related to the lawsuits related to the
15 Open Public Meetings Act and the Public Records Act and
16 those -- those violations.

17 Q Okay. So you stated that you thought Commissioner
18 Walkinshaw was not as engaged in the process as you would
19 like him to be. Did you find that frustrating?

20 A I did, yes.

21 Q And why did you find it frustrating?

22 A Because the Redistricting Commission's work is of
23 high importance.

24 Q Why do you think that the Redistricting Commission's
25 work is of high importance?

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1 A It has ramifications for the leadership of a state
2 of 7.5 million people. The work that -- The results of
3 the Redistricting Commission guide what will happen to the
4 people of the state for the next ten years.

5 Q And did Commissioner Walkinshaw seem to not
6 understand the gravity of the work, in your opinion?

7 MS. FRANKLIN: Objection, lacks foundation.

8 MS. GOLDMAN: Calls for speculation.

9 A I would -- I would estimate that he took it less
10 seriously than I did.

11 Q (By Ms. Waknin) How often did you meet with
12 Commissioner Walkinshaw during the redistricting process?

13 A Between his appointment in January and August I
14 would estimate I met with him probably three or four
15 times, between August and November probably an additional
16 seven or eight.

17 Q Would you have liked to have met with Commissioner
18 Walkinshaw more often?

19 MS. GOLDMAN: Object as to form.

20 A I would have, yes.

21 Q (By Ms. Waknin) Did you have regularly scheduled
22 calls or check-ins with Commissioner Walkinshaw?

23 A No, I did not.

24 Q How did you get information from yourself to
25 Commissioner Walkinshaw if you were not having regularly

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1 scheduled calls or check-ins?

2 A Broadly speaking, through Ali O'Neil.

3 Q To your knowledge do you know if Commissioner

4 Walkinshaw had regular check-ins with Commissioner Sims?

5 MS. FRANKLIN: Objection, lack of

6 foundation, calls for speculation.

7 A I do not know of a regularly scheduled meeting one
8 way or another.

9 Q (By Ms. Waknin) How would you describe your
10 staffing of Commissioner Walkinshaw during the
11 redistricting process?

12 MS. GOLDMAN: Objection, vague.

13 A I would describe it largely as producing map
14 alternatives and having him weigh in on very specific
15 components of it at times.

16 Q (By Ms. Waknin) Were you going with Commissioner
17 Walkinshaw to meetings that Commissioner Walkinshaw might
18 have had with other commissioners?

19 A Not on a regular basis. I did, as I said, attend
20 meetings where both April Sims and Brady Walkinshaw were
21 in attendance.

22 Q Did you ever attend meetings where both Commissioner
23 Walkinshaw and Commissioner Graves were in attendance?

24 A I do not believe so, no.

25 Q Did you ever attend meetings where Commissioner

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1 Walkinshaw and Commissioner Fain were in attendance?

2 A No, I do not believe so.

3 Q Can you explain to me what the dyads were?

4 A So I was not in Federal Way at the end there, but my
5 understanding is during those last few days the
6 commissioners agreed to pair off in bipartisan groups of
7 two to separately work on both the congressional and the
8 legislative maps.

9 Q And what was Commissioner Walkinshaw working on
10 during the dyad period?

11 MS. GOLDMAN: Objection, calls for
12 speculation.

13 A And I honestly don't know.

14 Q (By Ms. Waknin) Did Commissioner Walkinshaw have a
15 focus specifically on the congressional map or the
16 Legislative District map?

17 MS. GOLDMAN: Objection, calls for
18 speculation.

19 MS. FRANKLIN: Objection, lacks foundation.

20 A No, I don't think so. I would characterize his
21 interest as in specific geographies versus either of the
22 maps.

23 Q (By Ms. Waknin) Why did the commissioners go off
24 into groups of two dyads during the last few days of the
25 redistricting process?

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1 MS. GOLDMAN: Objection, calls for
2 speculation.

3 MS. FRANKLIN: Objection, lacks foundation.

4 Q (By Ms. Waknin) You can answer.

5 A I suspect that it's easier to negotiate in smaller
6 groups. And then also if more than two of them are in a
7 meeting together, it would be a violation of the Open
8 Public Meetings Act is my understanding.

9 Q Do you personally think it's easier then to get
10 around public meeting law if you're operating in dyads?

11 MS. GOLDMAN: Can I have the question read
12 back?

13 THE REPORTER: Yes. "Do you personally
14 think it's easier then to get around public meeting law if
15 you're operating in dyads?"

16 MS. GOLDMAN: Objection, calls for a legal
17 conclusion and calls for speculation.

18 MR. HOLT: Object to form as well.

19 A I -- I would not characterize that as getting around
20 the Open Public Meetings Act so much as following the Open
21 Public Meetings Act by not meeting in larger groups.

22 Q (By Ms. Waknin) Okay. Did you ever talk with Sarah
23 Augustine about the configuration of the Legislative
24 District map?

25 A I do not believe so, no.

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1 Q Did you ever talk with individuals at the Brennan
2 Center on Voting Rights Act compliance for the Legislative
3 District map?

4 A No, I did not.

5 Q Did anyone on the Walkinshaw team speak with anyone
6 at the Brennan Center --

7 A Yes.

8 Q -- on the Voting Rights Act compliance?

9 MS. GOLDMAN: Objection.

10 MS. FRANKLIN: Objection, lacks foundation.

11 MS. GOLDMAN: Calls for speculation.

12 A Yes, I believe so.

13 Q (By Ms. Waknin) Do you know who -- Well, strike
14 that.

15 Do you know who on the Walkinshaw team was speaking
16 with anyone at the Brennan Center?

17 MS. GOLDMAN: Objection, calls for
18 speculation.

19 MS. FRANKLIN: Objection, lacks foundation.

20 A I believe Adam Hall did.

21 Q (By Ms. Waknin) And how do you know that?

22 A He talked with me about it.

23 Q Did you have regular conversations with folks who
24 were on the Walkinshaw team during the redistricting
25 process?

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1 A Yes.

2 Q How did you have those conversations?

3 A Any number of ways -- text messages, phone calls,
4 Teams meetings, in-person meetings. I'm sure I'm leaving
5 out some other form of meeting, but all types.

6 Q And what was the nature of those communications?

7 MS. GOLDMAN: Objection as to form.

8 A Discussions of the maps, discussions of constituent
9 input, discussions of legislative and congressional
10 membership input, the whole -- I would say the entire
11 process.

12 Q (By Ms. Waknin) And would you have conversations
13 with each other if you had met with folks who were
14 providing feedback on the Legislative District maps?

15 MS. GOLDMAN: Objection as to form, vague,
16 calls for speculation.

17 Q (By Ms. Waknin) You can answer.

18 A In general, yes.

19 Q So what did Adam Hall say to you about his
20 conversation with the folks at the Brennan Center about
21 the Legislative District map?

22 A I don't recall.

23 Q Do you remember or do you have personal knowledge of
24 who Adam Hall was talking to at the Brennan Center?

25 A I'm sure I would recognize the name if I heard it,

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1 but I do not recall off the top of my head.

2 Q That's fair.

3 Now I'm going to specifically ask you about the
4 Yakima Valley area. How would you define the Yakima
5 Valley area?

6 A It's the -- largely the string of cities in Yakima
7 County, and depending on your definition, into Benton,
8 that are near the Yakima River.

9 Q Would you consider the Tri-Cities part of the Yakima
10 Valley area?

11 A I have not typically thought of them as such, no.

12 Q Did you ever discuss the configuration of the
13 state Legislative Districts in the Yakima Valley area with
14 April Sims?

15 A Yes.

16 Q How many times did you speak with April Sims about
17 this area?

18 A I believe only once.

19 Q Did you speak with Dominique Meyers about the
20 configuration of state Legislative Districts in the
21 Yakima Valley area?

22 A Yes.

23 Q How many times did you speak with Dominique Meyers?

24 A Several. I don't want to characterize it exactly,
25 but several times.

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1 Q What was the nature of the conversation that you had
2 with April Sims at one time about the configuration of the
3 state Legislative Districts in the Yakima Valley area?

4 A We were debating the relative importance of how to
5 draw the lines in that area.

6 Q Was the conversation about Voting Rights Act
7 compliance in the Yakima Valley area?

8 A It was, yes.

9 Q And what did you say about Voting Rights Act
10 compliance in the Yakima Valley area?

11 A I said that it was important both from a -- both
12 legally and from a -- and morally, I suppose; that it was
13 important to comply with the Voting Rights Act and to draw
14 districts that followed those guidelines.

15 Q How did Commissioner Sims respond when you made that
16 statement?

17 A She said that we should not expend political capital
18 doing that because the people in the area would have a
19 clear legal case to overturn that part of the map.

20 Q Can you elaborate on your understanding of what
21 April Sims meant when she said there would be a clear
22 legal case --

23 MS. FRANKLIN: Objection, lacks foundation.

24 Q -- to overturn that portion of the map?

25 MS. WAKNIN: I'm still talking.

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1 MS. FRANKLIN: Sorry about that.

2 Objection, lacks foundation.

3 MS. GOLDMAN: Objection, calls for a legal
4 conclusion.

5 Q (By Ms. Waknin) You can answer.

6 A I understood her thought process to be that it was
7 more important to draw favorable political lines in other
8 parts of the state because she could get a similar
9 result -- or the maps would have a similar result
10 following legal action in the Yakima Valley than they
11 would if we drew them differently the first time through.

12 Q So it was your understanding that in this
13 conversation that Commissioner Sims thought it was more
14 important to look at -- to focus on other areas of the map
15 than comply with the Voting Rights Act in the Yakima
16 Valley region while you were drawing the map?

17 MS. GOLDMAN: Objection, calls for
18 speculation.

19 MR. HOLT: Objection. Objection, form.

20 MS. FRANKLIN: Objection, lacks foundation.

21 Q (By Ms. Waknin) You can answer.

22 A That was my understanding, yes.

23 Q Who else was in that meeting when you were with
24 April Sims?

25 A I believe both Dominique and Osta, although it may

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1 only have been one of them, and Ali O'Neil.

2 Q Anyone else?

3 A I do not believe so. Brady was supposed to be in
4 that meeting but had not yet arrived in my recollection.

5 Q When was this conversation?

6 A I do not recall for sure, but I would estimate
7 August or September of 2021.

8 Q So would you characterize August or September of
9 2021 earlier in the redistricting process?

10 MS. GOLDMAN: Objection as to form.

11 MS. FRANKLIN: Objection, vague.

12 A I guess I would characterize it more as kind of the
13 middle of the process.

14 Q (By Ms. Waknin) What other areas of the state was
15 Commissioner Sims prioritizing over the Yakima Valley area
16 that you understand?

17 MR. HOLT: Objection, form.

18 MS. FRANKLIN: Objection, lacks foundation.

19 A Largely Snohomish County.

20 Q (By Ms. Waknin) Why -- I don't know how to pronounce
21 that. Sno --

22 A Snohomish, yes.

23 Q Snohomish County. Why Snohomish County?

24 MS. GOLDMAN: Objection, calls for
25 speculation.

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1 MS. FRANKLIN: Objection, lacks foundation.

2 A I believe -- My understanding was primarily to
3 protect a current House member and to draw a Senate
4 Democratic member out of his district.

5 Q (By Ms. Waknin) Any particular districts you can
6 remember?

7 A In particular it's the 44th Legislative District.

8 Q Who was that House member that you believed she was
9 trying to protect?

10 A Her name is escaping me right at the moment. I
11 apologize, I cannot think of her name.

12 Q That's okay. If you remember later on you can
13 always say it, and if you don't that's fine, too.

14 What's the basis for your belief that
15 Commissioner Sims was prioritizing Snohomish County over
16 the Yakima Valley area?

17 A In conversations both with Dom and Osta and also in
18 meetings where I was in attendance, along -- and April was
19 there as well, the focus on Snohomish County was widely
20 understood -- by me, I guess, anyway -- to be their top
21 priority in the state.

22 Q How did you feel when you heard Commissioner Sims
23 say it wasn't worth expending political capital on drawing
24 a compliant Latino opportunity district in the Yakima
25 Valley over protecting incumbents in Snohomish County?

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1 MS. GOLDMAN: Objection, misstates the
2 testimony.

3 MR. HOLT: Objection, form.

4 A I was extremely angry.

5 Q (By Ms. Waknin) And why were you extremely angry?

6 A I did not feel that that was why we were doing what
7 we were called to do as members and staff of the
8 Redistricting Commission.

9 Q And what did you believe that members and staff of
10 the Redistricting Commission were called to do?

11 MS. FRANKLIN: Objection, calls for a legal
12 conclusion.

13 MS. GOLDMAN: Join.

14 A Within the confines of both federal law, including
15 the Voting Rights Act, and state law laying out the
16 parameters of district maps, to draw maps that -- to the
17 benefit in our case of the, you know, Senate Democratic
18 Caucus and the House Democratic Caucus, but to do so
19 within the confines of state and federal law.

20 Q (By Ms. Waknin) And what did you believe was the
21 state and federal law that you had to follow as a map
22 drawer on the Redistricting Commission?

23 MS. GOLDMAN: Objection, calls for a legal
24 conclusion.

25 MR. HOLT: Objection, form.

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1 A On the federal side again, primarily the Voting
2 Rights Act and the ability of in particular the Hispanic
3 community in the Yakima Valley to elect representatives of
4 their choice.

5 And then on the state -- in state law I don't have
6 the statute in front of me, but it cites, you know,
7 population deviation being as minimal as possible, city
8 splits, county splits. There are a variety of metrics,
9 you know, laid out in the RCW as to how the maps should be
10 drawn.

11 Q (By Ms. Waknin) To your knowledge or in your
12 experience did Commissioner Sims's opinion about political
13 capital in the Yakima Valley area when it came to the
14 Legislative District map change during the redistricting
15 process?

16 MS. GOLDMAN: Objection, calls for
17 speculation.

18 MS. FRANKLIN: Objection, lacks foundation.

19 MR. HOLT: Objection. Objection, form.

20 A I would not say that I had any meetings with her
21 toward the end of the process to know one way or another.

22 Q (By Ms. Waknin) Did anyone on your team, on the
23 Walkinshaw team, have meetings with Commissioner Sims --

24 MS. GOLDMAN: Objection.

25 Q -- during the -- Sorry.

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1 MS. GOLDMAN: Objection, calls for
2 speculation.

3 A I believe -- I do not know. I believe that Ali
4 O'Neil probably met with her during that time when they
5 were in Federal Way, along with Brady, not independently
6 of him.

7 Q (By Ms. Waknin) Was the incumbent that April Sims
8 wanted to protect in the 44th District April Berg, to your
9 knowledge?

10 A Yes. Thank you. That is who I was thinking of.

11 Q Do you know anything about Ms. Berg?

12 A No, not -- not in any -- No.

13 Q Matt, I didn't ask you this before, but are you from
14 the state of Washington?

15 A Not originally, no.

16 Q How did you get involved in Washington politics?

17 A After -- After we moved to Washington state in 2010
18 I got a job for the state's Office of Financial
19 Management, and so I started working for the state at that
20 point, and then got a job with the Caseload Forecast
21 Council and from there moved to the State Senate.

22 Q And in what year did you move to the State Senate?

23 A 2014.

24 Q Are you still employed by the State Senate today?

25 A Yes.

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1 Q So almost ten years. That's a long time.

2 A It is, yes.

3 Q So besides the individuals we discussed so far did
4 you discuss the configuration of the state Legislative
5 Districts in the Yakima Valley area with anyone else?

6 A Probably. Yes, definitely Chris Stanley. And I'm
7 sure I talked with my wife about it at some point.

8 And I suspect it probably came up in like a caucus
9 staff meeting at some point or another. I would suspect
10 that we had conversations about it.

11 Q Did you ever speak with Anton Grose about the
12 configuration of the state Legislative Districts in the
13 Yakima Valley area?

14 A I don't think so.

15 Q Did you ever speak with Paul Campos about the
16 configuration of the state Legislative Districts in the
17 Yakima Valley area?

18 A No.

19 Q Who is Chris Stanley?

20 A He is the CFO for the Administrative Office of the
21 Courts. He's also just a long-time friend, so we have had
22 conversations going back many years.

23 Q And does your wife work in Washington politics?

24 A She does not, no.

25 Q Okay. I had to ask. Sorry.

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1 A Yeah.

2 Q It is 9:50, and you've been in the hot seat for 50
3 minutes. So do you want to take a break, or do you feel
4 good to continue on?

5 A I can continue at this point.

6 Q Okay.

7 A Thank you.

8 Q No problem, Matt.

9 So Matt, what's your experience drawing maps with
10 respect to the '21 Washington redistricting cycle?

11 A Can you clarify?

12 Q Yeah. Actually, just what's your experience in
13 general in drawing Legislative District maps?

14 A So I had not done it before thinking about this
15 redistricting cycle, but since that time I've used QJS and
16 Dave's Redistricting App, probably some -- Well, and
17 whatever the program was the state purchased for
18 redistricting, whose name I can't remember. Citygate, I
19 think.

20 And I don't know. I guess -- Could you provide more
21 information for --

22 Q Yeah. Well, I want to ask first was the software
23 that the Commission provided autoBoundedEDGE, --

24 A Oh, yes.

25 Q -- by any chance?

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1 A Yes, that is correct.

2 Q And so have you drawn maps for other jurisdictions
3 after your experience with the 2021 redistricting cycle?

4 A I also assisted in the Spokane County Commission
5 maps, yes.

6 Q And what did you do for the Spokane County
7 Commission maps?

8 A A similar role to what I did for the Senate
9 Democratic Caucus. I was working with some of the
10 Democratic politicians in Spokane County and providing
11 input on their map alternatives in the negotiation
12 process.

13 Q Did you draw any maps specifically for the Spokane
14 County Commission?

15 A Yes.

16 Q And were any of the maps that you drew adopted by
17 the Spokane County Commission?

18 A No, not directly at all, no.

19 Q What was the software program you used to draft
20 state Legislative District maps in Washington?

21 A Primarily I used Dave's Redistricting App for the
22 various options, and then for official submittals had to
23 go through the autoBoundedEDGE.

24 Q What is Dave's Redistricting App?

25 A It's a free web app that allows users to draw maps.

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1 You can -- Both congressional, legislative, community
2 maps. It's a quite flexible tool.

3 Q And can you explain to me how you get access to
4 Dave's Redistricting?

5 A Yeah, you just go to their website, and I'm not sure
6 if you need to sign up to draw a map. You certainly need
7 to register to save maps for use, but otherwise it's free,
8 open access.

9 Q And did you register to save maps?

10 A Yes.

11 Q And what was the account you registered at?

12 A I believe it's my personal Gmail account.

13 Q And what is that personal Gmail account?

14 A It's Matt.Bridges.WA@Gmail.com.

15 Q Okay. Why did you use Dave's Redistricting App
16 during the 2021 redistricting cycle?

17 A It's very flexible and fast and easy to share map
18 links.

19 Q What metrics that you remember can you view with
20 Dave's Redistricting App?

21 A There's demographic -- There's demographic data from
22 a few different points, including the 2020 census, and
23 election data going back, I believe, to 2016. And then
24 they also have sort of a hybrid 2012-2016 presidential
25 results.

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1 So it's primarily demographic and electoral data,
2 political data.

3 Q What demographic data can you view on Dave's
4 Redistricting App?

5 A Breakdowns by race and ethnicity and the voting age
6 population and citizen voting age population. I believe
7 that's everything.

8 Q What's voting age population?

9 A Age 18 and above.

10 Q And what is citizen voting age population?

11 A It's an estimate from the American Community Survey.
12 It's not produced by the census, the actual 2020 census,
13 but -- It's the same, 18 plus, but also an estimate of the
14 citizenship of the people -- or it's specifically people
15 who are citizens and age 18 plus.

16 Q And if I refer to citizen voting age population as
17 CVAP, would you understand what I'm talking about?

18 A Yes.

19 Q Okay. And if I refer to voting age population as
20 VAP, do you understand what I'm talking about?

21 A Yes.

22 Q Okay. And just for brevity, if I say DRA for Dave's
23 Redistricting App, would you understand what I'm talking
24 about?

25 A Yes.

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1 Q Okay. Do you refer to Dave's Redistricting as DRA?

2 A I usually just say DRA because I'm -- but yeah, DRA
3 is fine.

4 Q Or Dave's?

5 A Yeah, or Dave's. Yes.

6 Q Dave's. Okay.

7 So what's the difference between VAP and CVAP as you
8 understand the question?

9 MS. GOLDMAN: Objection to the degree it
10 calls for a legal conclusion.

11 A The -- I suppose the difference is people who are
12 age 18 plus and not citizens would not be included in
13 CVAP, where they are included in VAP.

14 Q (By Ms. Waknin) When it comes to map drawing, in
15 your opinion does knowing the difference between VAP and
16 CVAP matter?

17 A Yes.

18 MS. FRANKLIN: Objection, vague.

19 Q (By Ms. Waknin) Why does it matter?

20 A Both from a political perspective people who are
21 included in CVAP -- or included in VAP but not CVAP are
22 not eligible to vote, and so from a political perspective
23 that's important. And then also from a Voting Rights Act
24 perspective, the Voting Rights Act my understanding is
25 relies on CVAP as a basis.

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1 Q As a basis for what?

2 A Understanding when and where districts should be
3 drawn to represent their communities.

4 Q When you were drawing districts for the State
5 Legislative map for the 2021 redistricting how did you
6 determine if a district was a majority-minority district?

7 A Generally use --

8 MR. HOLT: Objection, form.

9 A Generally --

10 Q (By Ms. Waknin) You can answer.

11 A Generally using -- I would say we looked at both VAP
12 and CVAP, but using the estimates that were available on
13 Dave's.

14 Q Why did you look at both VAP and CVAP?

15 A Well, I think that VAP can be useful from
16 understanding where communities are and how to help keep
17 communities together. In particular, in areas where the
18 federal VRA does not necessarily apply, like south
19 Seattle, for example. If you wanted to try to keep
20 communities together, VAP can be a more useful measure
21 than CVAP.

22 Q When you were drawing the state Legislative District
23 maps for Commissioner Walkinshaw what were the
24 considerations you had while you were physically map
25 drawing?

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1 MS. GOLDMAN: Objection, vague.

2 A The -- I guess I always -- The map process always
3 started with the commitments in the RCW, in the statute in
4 terms of minimal population deviation, minimal county
5 splits, minimal city splits, all of those legal
6 requirements.

7 And then within that we were trying to keep current
8 members of the Senate -- of the Senate Democratic Caucus
9 in their districts and improve electoral outcomes for
10 those members and other districts in the state.

11 Q Did you consider the federal Voting Rights Act when
12 you were drawing state Legislative District maps?

13 A Not outside of the Yakima Valley area, but within
14 the Yakima Valley, yes.

15 Q Why not outside of the Yakima Valley area?

16 A It was my understanding that there were -- there
17 were no cohesive enough communities that the federal
18 Voting Rights Act would apply, my understanding.

19 Q When you were done drawing a Legislative District
20 map did you share it with anyone?

21 A Not automatically, but yes, quite frequently with
22 the other members of the Walkinshaw team.

23 Q And why did you share those maps with the other
24 members of the Walkinshaw team?

25 A We all had different areas of expertise, both

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1 geographically and, you know, as I said in terms of
2 communities, legal, what -- the input from constituents.
3 And so by sharing we were able to maximize our ability to
4 draw representative maps.

5 Q How would the Walkinshaw team review and evaluate
6 draft maps shared with -- shared with them?

7 MS. GOLDMAN: Objection, calls for
8 speculation.

9 A We had in-person meetings. We had virtual meetings.
10 We had, you know, email exchanges. And sometimes the
11 maps -- the exchanges were focused on specific geography,
12 sometimes focused on the map as a whole. We sometimes
13 had multiple different maps to compare to each other. It
14 was a very broad ranging conversation I would say.

15 Q (By Ms. Waknin) Did Commissioner Walkinshaw ever
16 direct you to show draft Legislative District maps to
17 anyone for feedback purposes?

18 A I don't believe so.

19 Q Did anyone on Commissioner Walkinshaw's team direct
20 you to show drafts -- show or share the draft Legislative
21 maps to anyone for feedback?

22 A We -- Well, we definitely shared draft maps with
23 Senators Billig and Pedersen. And then we also shared
24 maps with the UCLA Voting Rights Project. Those are the
25 ones I can think of right now.

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1 Q When you think of the UCLA Voting Rights Project are
2 you talking about Dr. Matt Barreto specifically?

3 A Yes.

4 Q Why did you share maps with Dr. Barreto?

5 A We knew that our understanding of both the Voting
6 Rights Act and the Yakima Valley in particular was narrow,
7 and we wanted to -- We wanted to get feedback on the map
8 proposals and work toward a sounder proposal in that area.

9 Q Who brought up -- Who was the first person on the
10 Walkinshaw team to bring up the Voting Rights Act
11 compliance in the Yakima Valley region?

12 MS. GOLDMAN: Objection, calls for
13 speculation, lack of foundation.

14 A I don't know for certain, but I would strongly
15 suspect that it was Adam Hall.

16 Q (By Ms. Waknin) Why would you strongly suspect that
17 it was Adam Hall?

18 A As I said earlier, he was -- His role in the team
19 was the, you know, legal compliance person.

20 Q Did you or other Walkinshaw staffers create any
21 documents to assess various state Legislative District
22 proposals?

23 MS. FRANKLIN: Objection, compound.

24 A I assume so, yes. If you could clarify what you
25 mean exactly, but -- I mean, we didn't do it very much in

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1 terms of physical documents. Almost everything we did was
2 virtual, but we produced spreadsheets and things of that
3 nature.

4 Q (By Ms. Waknin) And what were on those spreadsheets?

5 A Demographic data and political data primarily.

6 Q Why have political data on spreadsheets?

7 A Because we were working to create maps that would
8 elect more Democrats.

9 Q Is political data or understanding political data in
10 relation to a district important to understanding how that
11 district would perform?

12 MS. GOLDMAN: Objection to the degree it
13 calls for a legal conclusion.

14 A Yes.

15 Q (By Ms. Waknin) And why is performance important?

16 MS. GOLDMAN: Objection to the degree it
17 calls for a legal conclusion.

18 A I mean, I think in general it's important because
19 again, our role was working to create maps that elected
20 more Democrats, and in the Yakima Valley specifically it's
21 important for compliance with the federal Voting Rights
22 Act.

23 Q (By Ms. Waknin) Did anyone on the Walkinshaw team
24 understand -- To your knowledge did anyone on the
25 Walkinshaw team understand that performance was important

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1 to the Voting Rights Act --

2 MS. GOLDMAN: Objection to --

3 Q (By Ms. Waknin) -- in the Yakima Valley region?

4 MS. GOLDMAN: Objection, calls for
5 speculation, and objection to the degree it calls for a
6 legal conclusion.

7 MS. FRANKLIN: And objection, lacks
8 foundation.

9 A I would say yes, members of the Walkinshaw team
10 understood that. I don't think any of us were experts in
11 the Voting Rights Act in understanding exactly what it
12 required -- what it would require, but --

13 Q (By Ms. Waknin) Yes, that's fair. Fair enough.

14 Did you ever share with anyone on the Commissioner
15 Sims team --

16 A Yes.

17 Q -- the --

18 A Oh, sorry. Go ahead.

19 Q No, you continue talking. Sorry.

20 MS. GOLDMAN: There was no question.
21 Objection, no question.

22 Q (By Ms. Waknin) Did you ever share with anyone on
23 Commissioner Sims' team the importance of having a
24 performing district in the Yakima Valley region?

25 MS. GOLDMAN: Objection.

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1 MR. HOLT: Objection, form.

2 MS. GOLDMAN: Objection to the degree it
3 calls for a legal conclusion.

4 A Yes.

5 Q (By Ms. Waknin) Who did you share that with?

6 A In that conversation we were referring to earlier
7 with April Sims I shared that with her directly.

8 Q How did Commissioner Sims react when you shared that
9 information with her?

10 MR. HOLT: Objection, form.

11 A Well, again, she felt that it was not an area that
12 where political capital should be spent.

13 Q (By Ms. Waknin) And as you understood it, is
14 political capital -- was political capital important to
15 the Commissioner Sims team?

16 MS. GOLDMAN: Objection, calls for
17 speculation.

18 MS. FRANKLIN: Objection, lacks foundation.

19 A I would assume it was, as it was to us as well.

20 Q (By Ms. Waknin) And as you understood it, political
21 capital could outweigh compliance with the federal Voting
22 Rights Act to Commissioner Sims?

23 MR. HOLT: Object -- Objection, form.

24 MS. GOLDMAN: Objection, misstates the
25 testimony and calls for speculation.

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1 MS. FRANKLIN: Objection, lacks foundation.

2 A That was my understanding of the conversation, yes.

3 Q (By Ms. Waknin) Matt, how many maps did you draw --
4 How many Legislative District maps did you draw during the
5 legislative -- during the redistricting process?

6 A I don't know off the top of my head, but I would
7 estimate 150 or 200.

8 Q Why so many maps?

9 A There was a lot of input.

10 Q And when you say input, what do you mean by that?

11 A All of it. There were, you know, meetings around
12 the state where people came to testify about their
13 priorities, meetings with members of the Senate Democratic
14 Caucus, input from the rest of the Walkinshaw team -- just
15 trying to weigh all of those various ideas.

16 Q Did you ever receive community input or feedback
17 during -- on the Legislative District map during the
18 redistricting process?

19 A I personally did not directly, but yes, that was --
20 that was part of the process, and we did attempt to
21 incorporate those ideas and suggestions into maps where
22 possible.

23 Q So how did you receive that community feedback if
24 you didn't receive it directly?

25 A The Commission had meetings around the state was the

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1 largest element of doing that. And then Ali O'Neil tended
2 to coordinate or collate those into spreadsheets with like
3 the county or region that it involved and what the
4 specific testimony was.

5 Q Did you receive community feedback from anyone in
6 the Yakima Valley on the Legislative District maps during
7 the map drawing -- during the 2021 redistricting process?

8 A I --

9 MS. FRANKLIN: Objection, lacks foundation.

10 A I suspect that we did, yes. I don't remember it
11 specifically right now, but yes, I would imagine we did.

12 Q (By Ms. Wakinin) If there was a map being produced or
13 discussed by the Walkinshaw team, were you generally the
14 person who probably drew that map?

15 A More often than not, but Adam Bartz also did draw
16 maps as well.

17 Q Do you know on what software Adam Bartz drew maps?

18 A Again, primarily Dave's.

19 MS. WAKNIN: So I think this is a great
20 time for a 10-minute break. Does that work for folks?

21 THE WITNESS: (Nodded.)

22 MS. WAKNIN: Okay. Great. Jeanne, can we
23 go off the record?

24 THE REPORTER: Yes, off the record.

25 (Discussion off the record.)

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1 (Break 10:10 a.m. to 10:21 a.m.)

2 MS. WAKNIN: Jeanne, let's go back on the
3 record.

4 Q (By Ms. Waknin) Matt, did you talk to anyone during
5 the break?

6 A Only to Jessica.

7 Q Matt, to your knowledge did the commissioners
8 receive training or attend a workshop on the compliance Of
9 the voting Rights Act to the Legislative District maps?

10 MS. FRANKLIN: Objection, lacks foundation.

11 A I don't know one way or another.

12 Q (By Ms. Waknin) Okay. Was there discussion among
13 the Walkinshaw team on the Walkinshaw staff being trained
14 on what compliance with the Voting Rights Act means in
15 regards to the 2021 redistricting cycle?

16 MS. GOLDMAN: Objection, calls for
17 speculation.

18 MR. HOLT: Objection, form.

19 A I don't believe so, in the sense of any formal
20 training, no.

21 Q (By Ms. Waknin) To your knowledge when did the issue
22 of the federal Voting Rights Act come up during the 2021
23 redistricting cycle?

24 MS. FRANKLIN: Objection, --

25 MR. HOLT: Objection.

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1 MS. FRANKLIN: -- lacks foundation.

2 MR. HOLT: Objection, form.

3 A I honestly don't recall.

4 Q (By Ms. Waknin) Did you have conversations with the
5 Walkinshaw staff about compliance with the federal Voting
6 Rights Act with respect to the Legislative District map
7 during the 2021 Washington redistricting cycle?

8 A Yes.

9 Q When did you first have those conversations?

10 A I don't recall.

11 Q Do you have a timeframe in which you think those
12 conversations might have occurred?

13 MS. GOLDMAN: Objection, asked and
14 answered.

15 A No, not -- not specifically.

16 Q (By Ms. Waknin) What is your understanding of what
17 is required by the federal Voting Rights Act?

18 MS. GOLDMAN: Objection, calls for a legal
19 conclusion.

20 A My understanding is that there is sufficient
21 Hispanic CVAP in the Yakima Valley and Tri-Cities area to
22 sustain a district that is majority Hispanic by CVAP that
23 elects representatives of their choice.

24 Q (By Ms. Waknin) Okay. How did you form the basis of
25 your understanding -- of that understanding?

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1 A I'm not an attorney, so it's not my area of
2 expertise. I suppose I formed that basis because people
3 told me that was the case.

4 Q And who were those people?

5 A Adam Hall, Matt Barreto primarily.

6 Q When were you first under the impression that the
7 federal Voting Rights Act might apply to the Legislative
8 District map in the state of Washington?

9 MS. FRANKLIN: Objection to the extent --

10 MR. HOLT: Objection.

11 MS. FRANKLIN: -- it calls for a legal
12 conclusion.

13 MR. HOLT: Objection.

14 A Fairly early in the process. I don't have a specific
15 time.

16 Q (By Ms. Waknin) And what formed that belief?

17 A Conversations with Adam Hall primarily.

18 Q Did you have any conversations with Osta Davis or
19 Dominique Meyers where they expressed that the Voting
20 Rights Act did not apply in the state of Washington?

21 MR. HOLT: Objection, form.

22 A I do not believe so, no.

23 Q (By Ms. Waknin) Did Osta Davis or Dominique Meyers
24 ever express to you that they believed that the federal
25 Voting Rights Act applied to the State Legislative

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1 District map in the state of Washington?

2 MR. HOLT: Objection, form.

3 MS. FRANKLIN: Objection. Sorry.

4 MS. GOLDMAN: Objection, vague.

5 A I think so, yes.

6 Q (By Ms. Waknin) And why do you think so?

7 A My recollection of the time is that we were all in
8 agreement that a district -- that the federal Voting
9 Rights Act requires such a district in that area.

10 Q And when you say "we were all in agreement," who is
11 the we and all you're referring to?

12 A The Walkinshaw team and the Sims team of Osta and
13 Dom.

14 Q But not Commissioner Sims?

15 A I --

16 MS. FRANKLIN: Objection, lacks foundation.

17 Q (By Ms. Waknin) You can answer.

18 A I don't have the insight to weigh in on that.

19 MS. WAKNIN: I'm just going to ask for form
20 objections. Thank you.

21 Q (By Ms. Waknin) To your knowledge did you ever
22 witness anyone on the Commission express that the federal
23 Voting Rights Act did not apply to the state Legislative
24 District map in the state of Washington?

25 MR. HOLT: Objection, form.

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1 A I -- Not that I recall.

2 Q (By Ms. Waknin) What steps did the Walkinshaw staff
3 take to ensure that state Legislative District maps
4 complied with the federal Voting Rights Act --

5 MS. GOLDMAN: Objection.

6 Q (By Ms. Waknin) -- during the Washington
7 redistricting process?

8 MS. GOLDMAN: Objection, calls for
9 speculation and for a legal conclusion.

10 Q (By Ms. Waknin) You can answer.

11 A Primarily drawing districts -- a district that had
12 majority Hispanic CVAP and typically voted for Democrats
13 in statewide races, so just as the metrics. And then also
14 running district ideas and comparing district ideas with
15 Matt Barreto.

16 Q Why did it matter that the district you drew would
17 elect Democrats in statewide elections?

18 MS. GOLDMAN: Objection, misstates the
19 testimony.

20 A Historically speaking, Hispanic populations in
21 Washington state have tended to prefer Democratic
22 candidates to Republican candidates. And the federal
23 Voting Rights Act, my understanding is that it requires
24 the district -- where the -- where it is applicable, it
25 requires the district, the people of the district elect,

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1 broadly speaking, candidates of choice of the implicated
2 minority population.

3 Q (By Ms. Waknin) And is the reason for that so that
4 the minority population can actually fulfill their voting
5 rights in the district?

6 MS. GOLDMAN: Objection, calls for a legal
7 conclusion.

8 MR. HOLT: Objection, form.

9 A Could you restate the question?

10 Q (By Ms. Waknin) Sure. Is the reason why it matters
11 how a district performs, or if it performs for a minority
12 candidate of choice, is it important because then it
13 ensures that minority candidates -- that the minority
14 population can actually utilize their voting rights?

15 MS. GOLDMAN: Objection.

16 Q (By Ms. Waknin) Does that make sense?

17 MS. GOLDMAN: Objection, calls for a legal
18 conclusion.

19 MR. HOLT: Objection, form.

20 A Yeah, I -- That's my understanding of the Voting
21 Rights Act, but I am not an expert.

22 Q (By Ms. Waknin) Was there discussion -- To your
23 knowledge did the Commission hire any experts or
24 consultants on Voting Rights Act compliance?

25 MS. FRANKLIN: Objection, lacks foundation.

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1 A Not -- I don't know one way or another.

2 Q (By Ms. Waknin) Why did the Walkinshaw team hire
3 Dr. Barreto?

4 MS. FRANKLIN: Objection, lacks foundation.

5 A We as a team wanted to ensure that our maps did
6 comply with the federal Voting Rights Act to the best of
7 our ability.

8 Q (By Ms. Waknin) Are you familiar with who the
9 Washington Redistricting Commission, so the Commission --
10 I'm talking about the Commission itself -- who is on staff
11 for the Commission?

12 A I'm familiar with some of the staff, but not all of
13 them.

14 Q Who is the staff you're familiar with?

15 A I've worked most closely with Justin, whose last
16 name escapes me at the moment. He was their technical GIS
17 IT hire.

18 Q Is it Justin Bennett?

19 A Yes, thank you. Justin Bennett.

20 Q I won't tell him that you forgot his last name.
21 Don't worry.

22 Who else did you work with?

23 A Me directly, I think that was it, as far as I
24 recall.

25 Q Did the Walkinshaw team -- To your knowledge did the

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1 Walkinshaw team ask the Redistricting Commission to hire
2 a Voting Rights Act expert?

3 MS. FRANKLIN: Objection, lacks foundation.

4 MS. GOLDMAN: Calls for speculation.

5 A I don't know.

6 Q (By Ms. Waknin) To your knowledge was there anyone
7 who was hired by the Commission itself who was responsible
8 for assessing the performance of commissioners'
9 Legislative District maps?

10 MS. FRANKLIN: Objection, lacks foundation.

11 MS. GOLDMAN: Calls for speculation.

12 MR. HOLT: Objection, form.

13 A Not that I know of, but I don't know.

14 Q (By Ms. Waknin) Do you know if Justin Bennett ever
15 assessed the compliance of the commissioners' Legislative
16 District maps?

17 MS. GOLDMAN: Objection.

18 MS. FRANKLIN: Objection, lacks foundation.

19 MS. GOLDMAN: Calls for speculation.

20 A Not to my knowledge.

21 Q (By Ms. Waknin) Do you have any knowledge of whether
22 other commissioners' teams had a process of evaluating
23 whether their maps complied with the federal Voting Rights
24 Act?

25 MS. GOLDMAN: Objection, calls for

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1 speculation.

2 MS. FRANKLIN: Objection, lacks foundation.

3 MR. HOLT: Objection, form.

4 A I don't know one way or another.

5 Q (By Ms. Waknin) Who would know that information?

6 MS. GOLDMAN: Objection, calls for
7 speculation.

8 A I would assume the members of their teams.

9 Q (By Ms. Waknin) Did you do any analysis on whether
10 draft districts would enable Latino voters to elect
11 candidates of choice in the Yakima Valley area on the
12 state Legislative District maps you drew?

13 A I did, yes.

14 Q And what was that analysis?

15 A Primarily I used the 2020 gubernatorial results.
16 Other elections as well, but primarily based on the 2020
17 gubernatorial results.

18 Q What other elections did you also view?

19 A The -- I guess it would have been the 2016 and 2018
20 U.S. Senate races. I think that those were probably it.

21 Q Did you ever look at the 2020 treasurer's race?

22 A I did not, no.

23 Q Did anyone on the Walkinshaw team view the 2020
24 treasurer's race for performance of the -- for
25 performance?

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1 MS. GOLDMAN: Objection, calls for
2 speculation.

3 MR. HOLT: Objection, form.

4 A I don't -- Not that -- Not that I was a part of, but
5 I don't know outside of that.

6 Q (By Ms. Wakin) While you were drafting state
7 Legislative District maps what was the data that you used?

8 MS. GOLDMAN: Objection as to form.

9 A So again, my -- I primarily used data that was
10 available in Dave's Redistricting App for both demographic
11 and political performance data.

12 MS. WAKNIN: Okay. I'm going to introduce
13 Exhibit 1, so I will put it in the chat -- or I think
14 Annabelle is going to put it in the chat.

15 MS. GOLDMAN: Sonni, can you tell us what
16 it is? Because we have a pile here but no numbers.

17 MS. WAKNIN: It's an email -- and I can
18 also pull it up. It's an email from July 9, 2021.

19 MS. GOLDMAN: Is this it?

20 MS. WAKNIN: Yes, that should be it.

21 MS. GOLDMAN: Okay. And is it okay with
22 you if I hand the witness a hard copy?

23 MS. WAKNIN: Yes, that is okay with me.

24 MS. GOLDMAN: There's highlighting on it.

25 MS. WAKNIN: Yep. I did not do that.

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1 MS. GOLDMAN: Okay.

2 (Bridges Exhibit No. 1 introduced and displayed.)

3 Q (By Ms. Waknin) Matt, can you identify this document
4 for me?

5 A It is a forward it appears from Ali O'Neil to
6 Brady Walkinshaw of an email that I sent to Senator
7 Billig, Senator Pedersen and Brady Walkinshaw while cc'ing
8 Ali O'Neil, Adam Hall, Adam Bartz, and Paulette Avalos.

9 Q And what is this email about?

10 MS. GOLDMAN: Objection, the document
11 speaks for itself.

12 A It is an email about a draft legislative map.

13 Q (By Ms. Waknin) Is there a Dave's Redistricting link
14 in this email?

15 A There is, yes.

16 Q Okay. So can you read starting from, "Thanks for
17 the -- Thanks all for the discussion today" for me?

18 A Yeah. "Thanks all for the discussion today. The
19 attached file includes electoral data from the 2016 and
20 2020 gubernatorial races. The link below directs you to
21 the map." There's a Dave's link.

22 Q Okay. Yes. Sorry.

23 Did you draw this map as you were sending it?

24 A Yes, I would have drawn it. Yes.

25 Q Okay. So I'm going to go to the map, so -- And I'm

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1 going to copy. Please bear with me. I am bad at
2 technology. Okay.

3 (Map displayed.)

4 Q Can you see the map, --

5 A I can, yes.

6 Q -- Matt?

7 A Yes.

8 Q Okay. Can you read the title of the map for me?

9 A It says WA LEG from '20 Data.

10 Q And do you remember what this map is?

11 A So this -- So July 9th was prior to the release of
12 official census data, so this was an estimated legislative
13 map using OFM population estimates available at the time.

14 Q What are OFM population estimates?

15 A The Washington State Office of Financial Management
16 has a team that produces population estimates annually.

17 Q Did you draw this map in Dave's?

18 A I did, yes.

19 Q And is this a full map?

20 A It appears to be, yes.

21 Q Matt, what was the purpose of this map?

22 A Well, so it has been 18 months almost. I don't
23 remember specifically. But given my note at the end of
24 the email that I'd like to make the process as iterative
25 as possible, my speculation would be that I was trying to

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1 start a discussion about the legislative maps.

2 Q And what was the criteria that you used when you
3 were drawing this map?

4 A Again, I can't remember specifically, but in general
5 this appears to have been largely focused on political
6 performance.

7 Q Did you -- How did you draw the 14th Legislative
8 District when you were drawing this map?

9 A Can you rephrase the question?

10 Q I can. That was poorly worded.

11 Can you walk me through your -- the way in which you
12 drew the 14th Legislative District in this map?

13 A The early goals I would say that we had in that area
14 were uniting the Yakama Reservation in a single district
15 per their request and also uniting the largely Hispanic
16 communities of that area in that same district.

17 Q And so I can zoom in for you. Can you all see the
18 map? I see some heads nod.

19 A Yes. Yes.

20 Q Okay. Great. Why did you include the cities of
21 Wapato and Toppenish -- Toppenish in this map?

22 A Wapato and Toppenish are both largely Hispanic
23 cities.

24 Q And you included them in your Legislative District
25 14; is that correct?

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1 A That is correct, yes.

2 Q Was your Legislative District 14 here a majority
3 CVAP Latino district?

4 A I honestly do not recall, and it would have had to
5 have been with the data available at the time; but I don't
6 recall whether it was or not.

7 Q Okay. So I'm going to direct you over to the
8 district details over here. So can you read to me what
9 the Hispanic voting age population was on this map?

10 A 61,074 people and 55.4 percent.

11 Q But there's no CVAP here?

12 A Correct. That I can see, yeah.

13 Q So I'm going to turn on the data selector. I'm going
14 to choose the data set, and I'm going to look at citizen
15 voting age population.

16 What is the citizen voting age population -- What is
17 the citizen VAP 2019 of your District 14 for the Hispanic
18 population?

19 A 33,251 and 40.3, I believe that says, percent.

20 Q Okay. Did you have access to the 2019 citizen
21 voting age population when you were map drawing?

22 A I believe so, yes.

23 Q And why did you label this map District 14 -- this
24 district the majority voting age population Hispanic
25 district District 14?

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1 A District 14 elects state senators in presidential
2 years. District 15 elects state senators in the midterm
3 years. And turnout among the populations in that area
4 tends to be higher in presidential years than midterm
5 years.

6 Q So was it important to you then to make sure that a
7 Hispanic majority district would elect their candidates or
8 would elect candidates during a presidential year?

9 MS. GOLDMAN: Objection as to form.

10 MR. HOLT: Objection, form.

11 A It was to me, yes.

12 Q (By Ms. Waknin) Was it important to Commissioner
13 Walkinshaw?

14 MS. GOLDMAN: Objection, calls for
15 speculation.

16 MS. FRANKLIN: Objection, lacks foundation.

17 MR. HOLT: Objection, form.

18 A I don't know.

19 Q (By Ms. Waknin) Did you assess this map that you
20 drew for Voting Rights Act compliance?

21 MS. GOLDMAN: Objection, calls for a legal
22 conclusion.

23 A I do not recall one way or another.

24 Q (By Ms. Waknin) Do you recall if anyone on the
25 Walkinshaw team assessed this map for Voting Rights Act

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1 compliance?

2 MS. GOLDMAN: Objection, calls for
3 speculation.

4 MS. FRANKLIN: Objection, lacks foundation.

5 A I did not know.

6 Q (By Ms. Waknin) Did you share this map with anyone
7 outside of the Walkinshaw team?

8 A As defined, yes. Per the email it was also sent to
9 Senator Billig, Senator Pedersen, and Paulette Avalos.

10 MS. WAKNIN: I'm going to get off of this
11 map now. Jeanne, do you need a screenshot of the map?

12 THE REPORTER: Yes, could I take one? Just
13 a second. Thank you. Got it.

14 Did you want that marked as an exhibit?

15 MS. WAKNIN: No.

16 (Screenshot No. 1 taken.)

17 Q (By Ms. Waknin) Matt, what happened after you drew
18 that map with respect to -- Strike that.

19 What happened after you drew that map?

20 MS. GOLDMAN: Objection as to form.

21 A I don't remember anything specifically happening in
22 regards to this map.

23 Q (By Ms. Waknin) Did you get any feedback on that
24 map?

25 MS. GOLDMAN: Objection, asked and

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1 answered.

2 A I do not recall one way or another.

3 Q (By Ms. Waknin) Were there -- After you drew that
4 map were there conversations about a Latino opportunity
5 district in Eastern Washington that had a citizen voting
6 age population of over 50 percent?

7 MS. FRANKLIN: Objection, lacks foundation.

8 MR. HOLT: Objection, form.

9 MS. GOLDMAN: Join.

10 A I mean, yes. After July 9th of 2021 we definitely
11 had conversations about the federal Voting Rights Act and
12 the districts in the Yakima Valley.

13 Q (By Ms. Waknin) Did you continue to draw maps after
14 July 9th, 2021 for Commissioner Walkinshaw that were
15 Legislative District maps?

16 A Yes.

17 Q And what was the goal of the maps that you were
18 drawing after July 9th for Commissioner Walkinshaw?

19 A The same as all of the maps that I drew. We were
20 attempting to follow the strictures of both the federal
21 Voting Rights Act and the state RCWs and within those
22 guidelines maximize districts that elected Democrats.

23 Q Was there a deadline or -- Strike that.

24 Did Commissioner Walkinshaw introduce any of the
25 Legislative District maps that you or the Walkinshaw team

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1 drew publicly?

2 A There were two publicly introduced proposals from
3 Commissioner Walkinshaw, yes.

4 Q When was the first public proposal?

5 A Late -- mid to late September, I believe, 2021.

6 Q And when was the second map that you introduced
7 publicly or that Commissioner Walkinshaw introduced
8 publicly?

9 A I believe mid October of 2021.

10 Q Do you know who picked the September release date
11 for the Legislative District map?

12 MS. GOLDMAN: Objection, calls for
13 speculation.

14 MS. FRANKLIN: Objection, lacks foundation.

15 A I believe that was a decision made by the Commission
16 as a whole.

17 Q (By Ms. Waknin) What were the conversations that you
18 were having with the Walkinshaw team between July 9th,
19 2021 and up until the first September public released map
20 with respect to the Yakima Valley region on the state
21 Legislative District map?

22 MS. GOLDMAN: Objection as to form.

23 MR. HOLT: Objection, form.

24 A I don't recall the conversations specifically.

25 We -- I know we had conversations about the Hispanic

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1 opportunity district being the 14th Legislative District,
2 and I know we had conversations, ongoing conversations
3 about uniting the Yakama Nation with the Hispanic
4 populations in that area.

5 Q (By Ms. Waknin) What was the reason why you had
6 conversations about the -- labeling the Latino district in
7 the Yakima Valley as 14?

8 MR. HOLT: Objection, form.

9 A As I said before, the 14th being the district --
10 being a district that elects its state senator in
11 presidential years was an important factor in our map
12 drawing.

13 Q (By Ms. Waknin) Who did you have those conversations
14 with?

15 A The Walkinshaw team.

16 Q Did you ever have conversations with Commissioner
17 Sims' team about labeling the Latino district in the
18 Yakima Valley region as the 14th District?

19 MR. HOLT: Objection, form.

20 A Yeah, I'm -- I can't recall a specific conversation,
21 but I am sure that it came up, yes.

22 MS. WAKNIN: I am going to introduce
23 Exhibit 2, which is an 836-page document. Just to let you
24 know, Annabelle put it in the chat.

25 (Bridges Exhibit No. 2 introduced.)

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1 Q (By Ms. Waknin) And I'm going to direct you to
2 page 326. I can share screen if that's easier.

3 MS. GOLDMAN: Yep.

4 MS. WAKNIN: Okay. Why don't I do that.

5 MS. GOLDMAN: We did not print that one.

6 MS. WAKNIN: Yeah, I can understand why.

7 MS. GOLDMAN: Okay. So just go to the main
8 screen.

9 (Bridges Exhibit No. 2 displayed.)

10 A Okay. I can see it.

11 Q (By Ms. Waknin) Very good. Great. Matt, can you
12 identify this document for me?

13 A It is an email that I sent on September 17th to
14 Ali O'Neil, Adam Bartz, Adam Hall, cc'ing Paulette Avalos
15 and Brady Walkinshaw.

16 Q Okay. And can you read from, "Hi All," until we get
17 to the Dave's link?

18 A "Hi All. Adam B. and I have been working on tweaks
19 to the map in response to a few concerns raised and to
20 improve population balance. We both think we're done now,
21 so here's the final-ish LD map."

22 Q And would you mind reading the date of this email
23 for me?

24 A September -- Friday, September 17, 2021.

25 MS. WAKNIN: I am going to copy the Dave's

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1 link and stop share here for a second, and we are going to
2 go to that Dave's link.

3 (Map displayed.)

4 Q Can everyone see my screen?

5 MS. GOLDMAN: Yes.

6 A Yes.

7 Q (By Ms. Waknin) Matt, did you draw this map?

8 MS. GOLDMAN: Objection, calls for
9 speculation.

10 A It certainly from a statewide view looks similar to
11 maps that Adam Bartz and I drew together, yes.

12 Q (By Ms. Waknin) And do you mind reading the title of
13 the map for me?

14 A SDC Final LD map.

15 Q Do you remember what that means?

16 A That would be Senate Democratic Caucus Final
17 Legislative District Map.

18 Q And I'm going to turn on the district lines here and
19 the labels.

20 Is this your LD 14 in this map?

21 MS. GOLDMAN: Objection as to form.

22 A It -- The layout looks very similar to 14th District
23 maps that we were proposing at that time, yes.

24 Q (By Ms. Waknin) To your knowledge -- Strike that.

25 Did you assess this map for Voting Rights Act

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1 compliance?

2 MS. GOLDMAN: Objection, calls for a legal
3 conclusion.

4 A That's not really my area of expertise. We -- Yeah,
5 I wouldn't say that I did, no.

6 Q (By Ms. Waknin) Did Adam Hall assess this map for
7 Voting Rights Act compliance to your knowledge?

8 MS. GOLDMAN: Objection.

9 MS. FRANKLIN: Objection.

10 MS. GOLDMAN: Calls for objection.

11 MS. FRANKLIN: Lacks foundation.

12 A Yeah, I don't -- I don't really know.

13 Q (By Ms. Waknin) Did you have conversations with the
14 Walkinshaw team about this map?

15 A Yes.

16 Q And who were on that -- Who was in that conversation
17 or those conversations?

18 A The bulk of the conversations were between Ali
19 O'Neil, Adam Hall, Adam Bartz and myself, and
20 Commissioner Walkinshaw provided input and, of course,
21 gave final sign-off on the maps.

22 And during the process we also got feedback from
23 Senators Billig and Pedersen as well.

24 Q So Adam Hall did see this map?

25 A He saw this map, yes.

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1 Q Did Adam Hall have any comments to you about this
2 map?

3 A Not that I recall specifically one way or another.

4 Q Did Commissioner Walkinshaw see this map?

5 A Yes.

6 Q Did Commissioner Walkinshaw have any comments to you
7 about this map?

8 A Again, not that -- no specific comments that I can
9 recall.

10 Q Are the metrics of this map substantially similar to
11 the map from July 9th with respect to the 14th Legislative
12 District?

13 MS. GOLDMAN: Objection. The maps speak
14 for themselves.

15 A I don't remember what the specific metrics were. It
16 looks broadly similar, reading through the voting age
17 population.

18 MS. WAKNIN: Okay. Jeanne, you can take a
19 screenshot of this now.

20 THE REPORTER: Okay. Thank you. Got it.

21 (Screenshot No. 2 taken.)

22 Q Okay. I'm going to stop sharing.

23 Was the map that we just viewed the one that
24 Commissioner Walkinshaw published in September?

25 MS. GOLDMAN: Objection, calls for

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1 speculation.

2 A I would need to see the specific precinct and census
3 block boundary lines, but broadly speaking it looks very
4 similar.

5 Q (By Ms. Waknin) Did all four commissioners publicly
6 release Legislative District maps during the 2021
7 redistricting process in Washington?

8 A Yes.

9 Q Did you review the maps by other commissioners?

10 A Not prior to release, no.

11 Q Post release did you review the Legislative District
12 maps by other commissioners?

13 A Yes.

14 Q Did you review Commissioner Sims' Legislative
15 District map that she released in September?

16 A Yes.

17 Q Did Commissioner Sims' Legislative District map
18 include a Latino opportunity district?

19 MS. FRANKLIN: Objection to the extent it
20 calls for a legal conclusion.

21 MS. GOLDMAN: And objection, calls for
22 speculation.

23 A I do not recall the specific demographics of her
24 map, but I do believe that there was a district with
25 certainly a high Hispanic population in the Yakima Valley.

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1 Q (By Ms. Waknin) Did Commissioner Graves' Legislative
2 District map include a Latino opportunity district from
3 the September release?

4 MS. GOLDMAN: Objection, calls for
5 speculation, and it calls for a legal conclusion.

6 A I don't believe so, no.

7 Q (By Ms. Waknin) Did Commissioner Fain's Legislative
8 District map include a Latino opportunity district from
9 the September release?

10 MS. GOLDMAN: Objection, calls for
11 speculation and calls for a legal conclusion.

12 A I don't believe so, no.

13 Q (By Ms. Waknin) Why don't you believe so?

14 A I don't believe that their maps met population
15 thresholds or -- yeah, for minority populations.

16 Q What happened after Commissioner Walkinshaw
17 introduced his Legislative District map proposal in
18 September?

19 MS. GOLDMAN: Objection.

20 MS. FRANKLIN: Objection, vague.

21 MS. GOLDMAN: Objection as to form.

22 A We continued refining the maps, and we attempted to
23 work toward a joint Commissioner Sims and Commissioner
24 Walkinshaw map.

25 Q (By Ms. Waknin) Why did you work towards a joint

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1 Commissioner Sims and Commissioner Walkinshaw map with
2 respect to the Legislative District map?

3 A We felt that it would improve our bargaining
4 position if we could speak with one voice.

5 Q And was the focus of the joint map from
6 Commissioner Walkinshaw and Commissioner Sims in your
7 opinion having to do with ensuring there was a VRA-
8 compliant Legislative District in the Yakima Valley area?

9 MS. GOLDMAN: Objection, calls for a legal
10 conclusion.

11 MR. HOLT: Objection, form.

12 MS. GOLDMAN: And leading.

13 A I wouldn't say that that was the focus, no.

14 Q (By Ms. Waknin) Was it one aspect of why there was a
15 joint map, --

16 MS. GOLDMAN: Objection.

17 Q -- in your opinion?

18 MS. GOLDMAN: Objection as to form.

19 MR. HOLT: Objection.

20 MS. GOLDMAN: And calls for a legal
21 conclusion.

22 A It was certainly an element of the conversation.

23 Q (By Ms. Waknin) Did you receive feedback from
24 Commissioner Walkinshaw after the public release of the
25 Legislative District proposal on the map?

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1 MS. GOLDMAN: Objection to form.

2 MR. HOLT: Objection, form.

3 A Probably. I don't remember any specific feedback.

4 Q (By Ms. Waknin) At what point did Commissioner

5 Walkinshaw's team involve Dr. Matt Barreto in the

6 redistricting process?

7 MS. GOLDMAN: Objection, calls far

8 speculation.

9 A I cannot remember the timing of events.

10 Q (By Ms. Waknin) Did Dr. Barreto comment on

11 Commissioner Walkinshaw's September released Legislative

12 District map to your knowledge?

13 MS. GOLDMAN: Objection, calls for

14 speculation.

15 MR. HOLT: Objection, form.

16 Q (By Ms. Waknin) Go ahead.

17 A Yes, I believe so.

18 Q Matt, did you have conversations with Dr. Barreto?

19 A I did, yes.

20 Q How many conversations did you have with

21 Dr. Barreto?

22 A I would estimate three.

23 Q Throughout the redistricting process?

24 A Yes, verbal conversations. There were also email

25 exchanges.

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1 Q How many email exchanges did you have with
2 Dr. Barreto through the redistricting process?

3 A Probably a few -- five or six, maybe.

4 Q What was the nature of the email exchanges you had
5 with Dr. Barreto?

6 MR. HOLT: Objection, form.

7 Q (By Ms. Waknin) You can answer.

8 A Broadly speaking, we were attempting to understand
9 what the boundaries of the district that -- that complied
10 with the VRA might look like, how best to comply with the
11 VRA.

12 Q And why in your opinion was Dr. Barreto qualified to
13 tell you how to comply with the Voting Rights Act?

14 MS. GOLDMAN: Objection, calls for
15 speculation, and calls for a legal conclusion.

16 A I was not involved in the selection process. That's
17 not my area of expertise.

18 Q (By Ms. Waknin) Did you think -- When you were
19 working with Dr. Barreto did you think he was qualified to
20 give you information on the Voting Rights Act?

21 MS. GOLDMAN: Objection, calls for
22 speculation, and calls for a legal conclusion.

23 A He -- He was more qualified than I was certainly.

24 Q (By Ms. Waknin) Did Dr. Barreto author a report on
25 the Yakima Valley area and how the federal Voting Rights

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1 Act applied to that area?

2 MS. GOLDMAN: Calls for speculation.

3 MS. FRANKLIN: Objection, lacks foundation.

4 A Yes, I believe so.

5 Q (By Ms. Waknin) Did you see this report?

6 A Yes.

7 MS. WAKNIN: I'm going to pull up

8 Exhibit 3, LEG-Bridges_001039.

9 (Bridges Exhibit No. 3 introduced.)

10 MS. GOLDMAN: And I'm going to hand that to
11 him, Sonni.

12 MS. WAKNIN: Okay.

13 Q (By Ms. Waknin) Matt, why don't you just take a look
14 and verify. It should say October 18th, 2021 on top,
15 Dr. Matt Barreto.

16 MS. GOLDMAN: I gave you too much. Hold
17 on. There you go.

18 A Okay. Yes, it does.

19 MS. GOLDMAN: And this is Exhibit 3?

20 Q (By Ms. Waknin) Why don't you just take a second to
21 look through that.

22 MS. GOLDMAN: Three?

23 MS. WAKNIN: It's three, yes.

24 (Pause in proceedings to review document.)

25 Q (By Ms. Waknin) Matt, have you looked through it?

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1 A Yes, just finished.

2 Q And all the pages are there, 25 pages?

3 A That seems -- That seems like about what it was,
4 yes.

5 Q Okay. Good.

6 A Yeah.

7 Q Making sure.

8 Matt, can you tell me in your words what this
9 document is?

10 MS. GOLDMAN: Objection, the document
11 speaks for itself, calls for a legal conclusion.

12 A It's an evaluation of the Hispanic population
13 percentages in five counties in the Yakima Valley area,
14 and an analysis of electoral patterns in those counties,
15 and an analysis of both the published commissioner maps
16 and two alternative maps -- two alternative districts for
17 that area.

18 Q (By Ms. Waknin) How did you receive this report?

19 A Presumably via email. I don't remember.

20 Q Did you read this report when you received it?

21 A Yes.

22 Q What did you think about it when you received it?

23 MS. GOLDMAN: Objection as to form.

24 A I think it's -- It was -- It was a useful input to
25 help guide our decision-making process for the remainder

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1 of the redistricting time period.

2 Q (By Ms. Waknin) Was there anything in particular
3 when you read this report that you looked at specifically?

4 MS. FRANKLIN: Objection, vague.

5 A For my purpose -- After initial review, for my
6 purposes the two alternative maps that were proposed were
7 the most useful tools.

8 Q (By Ms. Waknin) In this report can you go to page
9 18. The title will be Evaluating Different Maps. And the
10 page numbers are very small, but they're right on the
11 bottom right-hand on the page.

12 MS. GOLDMAN: Could you tell us the Bates
13 number? Because those are dark and large.

14 MS. WAKNIN: Oh, sure. Sorry. 001056.

15 A Okay. I am on that page.

16 Q (By Ms. Waknin) Okay. And it appears that
17 Dr. Barreto evaluated different legislative map proposals
18 that had come out publicly; is that correct?

19 A Yes.

20 MS. GOLDMAN: Objection, calls for
21 speculation. The document speaks for itself.

22 A Yes.

23 Q (By Ms. Waknin) And what did Dr. Barreto say about
24 House Republicans Commissioner Graves' map?

25 MS. GOLDMAN: Objection, speaks for itself.

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1 Do you want him to read this out loud?

2 MS. WAKNIN: Yes.

3 A That the map was textbook cracking of Latino
4 population into three districts, 14, 15, 16. That the
5 Latino total population of the 14th was 37 percent, the
6 15th 54 percent, the 16th 41 percent. And that the Latino
7 CVAP of the 14th was 22 percent, 15th 34 percent, and 16th
8 23 percent.

9 Q (By Ms. Waknin) So the Latino CVAP in Commissioner
10 Graves' map, none of the districts were over 50 percent
11 Latino CVAP; is that correct?

12 A According to this document, yes.

13 Q Okay. And is that the same for Commissioner Fain's
14 Legislative District map, according to this document?

15 A It is, yes.

16 Q And can you go to page 19, Bates label 001057.

17 A Yes.

18 Q For House Democrats Commissioner Sims can you read
19 the Latino CVAP for me?

20 A For the 15th Legislative District 45 percent.

21 Q And District 16?

22 A 28 percent.

23 Q And then can you read for Senate Democrats
24 Commission Pinero Walkinshaw the Latino CVAP for me?

25 A For the 14th it is 40 percent, and for the 15th it

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1 is 16 percent.

2 Q So Dr. Barreto pointed out that none of the four
3 maps that were proposed publicly from the Washington My
4 Districting.com had a Latino CVAP of higher than
5 50 percent; is that correct?

6 A That is correct, yes.

7 Q Did doctor -- Did Dr. Barreto explain to you what
8 racially polarized voting is?

9 A Yes.

10 Q How do you understand racially polarized voting?

11 MS. GOLDMAN: Objection to the degree it
12 calls for a legal conclusion.

13 A Essentially that different demographic populations
14 choose different candidates over -- over an extended time,
15 across races -- across political races, I should say, and
16 across time.

17 Q (By Ms. Waknin) And what is -- In your opinion why
18 is racially polarized voting significant?

19 MS. GOLDMAN: Objection, calls for a legal
20 conclusion, and calls for speculation.

21 A It's important for communities to be able to elect
22 representatives of their choice.

23 Q (By Ms. Waknin) Do you know if this presentation by
24 Dr. Barreto was shared with anyone outside of the
25 Walkinshaw team?

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1 MS. GOLDMAN: Objection, calls for
2 speculation.

3 MS. FRANKLIN: Objection, lacks foundation.

4 A I don't know one way or another.

5 Q (By Ms. Waknin) Did the Senate Democrats make
6 Dr. Barreto's presentation public?

7 A I believe so, yes.

8 Q So Dr. Barreto's presentation was shared with people
9 outside of the Walkinshaw team?

10 MS. GOLDMAN: Objection, calls for
11 speculation.

12 A Yeah, I honestly can't remember.

13 Q (By Ms. Waknin) After Dr. Barreto provided feedback
14 to Commissioner -- Strike that.

15 After the Barreto presentation was presented to you
16 what did you do next with respect to the legislative --
17 with respect to drawing Legislative District 14?

18 A I worked to incorporate either both of those -- maps
19 similar to the two alternative maps into other legislative
20 map proposals to see how those districts would impact the
21 surrounding districts.

22 Q And how did those districts impact surrounding
23 districts?

24 A I mean, the districts had to move. I don't have
25 a -- You know, obviously there was a need for population

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1 balance. We had to reorient the districts around those
2 districts, around the proposed alternatives.

3 Q Did you -- After you received guidance from
4 Dr. Barreto's report or findings, how many additional
5 Legislative District maps did you draw?

6 A I don't know, but it would have been a lot. So at
7 that point we still had almost a month until the end of
8 the timeline.

9 Q And how did your map drawing change with respect to
10 LD -- the Legislative District 14 or the Yakima Valley
11 area after Dr. Barreto's report?

12 A I believe all of the proposals from that point
13 forward contained maps similar to one of the two
14 alternatives that Dr. Barreto proposed, and the focus in
15 that area was much more on the Hispanic CVAP population.

16 Q And to your knowledge when did conversations start
17 with Commissioner Sims' team about ensuring a VRA-
18 compliant district after Dr. Barreto's report in the
19 Yakima Valley region?

20 MS. FRANKLIN: Objection, lacks foundation.

21 A I think more or less immediately is my recollection,
22 but I don't have a specific timeline.

23 Q (By Ms. Waknin) To your knowledge did Commissioner
24 Sims or her team view the Dr. Barreto report?

25 MS. GOLDMAN: Objection, calls for

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1 speculation.

2 MS. FRANKLIN: Objection, lacks foundation.

3 MR. HOLT: Objection. Objection, form.

4 A I cannot remember.

5 Q (By Ms. Waknin) Did you have any conversations with
6 Commissioner Sims' team about Dr. Barreto's findings?

7 A About the findings, yes. Again, I don't -- The
8 report specifically I don't remember whether we discussed,
9 but about the findings, yes.

10 Q What did you discuss about the findings with
11 Commissioner Sims' team?

12 A Primarily that the proposals that we had that were
13 public -- the September public proposals were not strong
14 enough and that we needed to improve the districts in that
15 area.

16 Q How did Commissioner Sims' team react when that was
17 said to them?

18 MR. HOLT: Objection, form.

19 A I don't have a specific recollection of that.

20 Q (By Ms. Waknin) What was the purpose of the
21 additional Legislative District map public proposal from
22 Commissioner Sims and Walkinshaw?

23 MR. HOLT: Objection, form.

24 MS. FRANKLIN: Objection, lacks foundation.

25 A The Walkinshaw team wanted to publicly address not

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1 only the Yakima Valley region, but other shortcomings in
2 the September map that had been highlighted in the
3 interim.

4 Q (By Ms. Waknin) Did you discuss which candidates
5 Latino voters preferred in the Yakima Valley region with
6 Commissioner Sims' team?

7 A Not beyond the Hispanic populations tending to
8 prefer Democrats, broadly speaking.

9 Q Can you elaborate on what you mean? I'm sorry.

10 MS. GOLDMAN: Objection as to form.

11 A I don't recall having any conversations about
12 specific candidates or specific elections with the Sims
13 team outside of the -- again, just the Hispanic and Native
14 populations in that area tending to vote for Democratic
15 candidates.

16 Q (By Ms. Waknin) Was there a perceived need by the
17 Walkinshaw team -- Strike that.

18 To your knowledge why did the Walkinshaw team
19 publish another Legislative District map publicly?

20 MR. HOLT: Objection, form.

21 MS. GOLDMAN: Objection.

22 MS. FRANKLIN: Objection, asked and
23 answered.

24 MS. GOLDMAN: And calls for speculation.

25 A I would refer back to my earlier answer that

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1 shortcomings in our map, both in the Yakima Valley and
2 elsewhere, had been pointed out, and we wanted to publicly
3 address those concerns.

4 Q (By Ms. Waknin) Was there ever a time in which there
5 was a disagreement between Commissioner Sims' team and
6 Commissioner Walkinshaw's team on a Voting Rights Act
7 compliant district in Eastern Washington?

8 A Yes.

9 MS. FRANKLIN: Objection, lacks foundation.

10 Q (By Ms. Waknin) What was that disagreement?

11 A As I stated earlier, there was disagreement about
12 the level of political capital that should be expended to
13 ensure such a district.

14 MS. WAKNIN: I'm going to pull up
15 Exhibit 4. It is an email from Friday, October 22nd,
16 2021.

17 (Bridges Exhibit No. 4 introduced.)

18 Q Matt, do you have it in front of you? At the bottom
19 of the page it should say 216.

20 A Yes.

21 Q Okay. Can you read to me the bottom email?

22 A Yep. It's from me to April Sims, and it says,
23 "April, I wanted to reach out to apologize for losing my
24 cool in the meeting today. I view the fight for voting
25 rights as the most critical one of our time, and I let

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1 that passion get the better of me. I'm sorry. Please let
2 me know if there's anything I can do to repair our
3 relationship. Thank you. Matt Bridges."

4 Q Can you tell me about what happened, why you would
5 send an apology email to April Sims?

6 A So this was an email that followed the conversation
7 that we referenced earlier today that I had with
8 April Sims. And again, as I said in my earlier testimony,
9 I was very angry with her views on the issue, and so I
10 lost -- as I said in the email, I lost my cool, and so I
11 was apologizing for that.

12 Q Who else was in this meeting that -- where you had a
13 disagreement with Commissioner Sims?

14 A As I said before, I don't recall specifically, but I
15 believe it was Osta and Dom, although it may have only
16 been one or the other. April Sims was there, and I believe
17 Ali O'Neil was there as well.

18 Q Can you explain why you were angry with
19 Commissioner Sims' view on the Yakima Valley State
20 Legislative District?

21 A Well, as I said before, she stated that she did not
22 view it being worth expending political capital to create
23 a VRA-compliant district in the Yakima Valley because such
24 a district would be created via litigation after the fact.

25 Q Did April Sims tell you why she believed that such a

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1 district would be created via litigation after the fact of
2 you drawing the maps?

3 A Not that I recall.

4 Q Did you find that strange that she would say such a
5 thing?

6 MS. GOLDMAN: Object as to form.

7 A No.

8 Q (By Ms. Waknin) Why didn't you find it strange that
9 she would say that?

10 MS. GOLDMAN: Objection as to form.

11 A I would say by this point in the process it was
12 clear to me that the two caucuses, the House Democratic
13 and Senate Democratic Caucus had different priorities for
14 the redistricting process.

15 Q (By Ms. Waknin) And at that point what were the
16 different priorities between the two caucuses?

17 MS. GOLDMAN: Objection, calls for
18 speculation.

19 A On the Walkinshaw team's part -- As before, we were
20 working within the confines of the federal VRA and the
21 state RCWs around redistricting to create maps that abided
22 by all of those and maximized Democratic seats or seats
23 that would elect Democrats.

24 And I don't have any, you know, sense of the -- or,
25 you know, I have no specific insight into the internal

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1 workings of the Sims team.

2 Q (By Ms. Waknin) But you know that the Sims team at
3 that point had different priorities; correct?

4 A That was my feeling, yes.

5 Q And how -- Why do you have -- Why did you have that
6 feeling? What was that based on?

7 A Well, for example, this email, they were clearly
8 less concerned with the federal Voting Rights Act, and
9 then in other parts of the state they were again more
10 concerned with specific members of the Legislature than
11 districts as a whole.

12 Q So is it fair to say a difference between the
13 priorities of the Walkinshaw team and the Sims team as you
14 understand it was commitment to voting rights in the
15 Yakima Valley region for the Legislative District map?

16 MR. HOLT: Objection, form.

17 MS. FRANKLIN: Objection, lacks foundation.

18 MS. GOLDMAN: Objection, calls for a legal
19 conclusion.

20 A As I understood it, yes.

21 Q (By Ms. Waknin) You can put that exhibit away.

22 MS. WAKNIN: All right. I'm going to pull
23 up Exhibit 5. It is another email. It is from Monday,
24 October 25th, 2021. And the Bates label, Jessica, is
25 LEG-Bridges_001285. It's also in the chat.

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1 (Bridges Exhibit No. 5 introduced.)

2 A Okay. I have it in front of me.

3 Q (By Ms. Waknin) Matt, is this an email from you to
4 Ali O'Neil, Adam Bartz, Adam Hall and Paulette Avalos?

5 A Yes. The top email is, yes.

6 Q What does the email thread say?

7 A It -- I have not read through the entire text of the
8 multiple pages, but in general it looks like preparation
9 for the publishing of the second public map from
10 Commissioner Walkinshaw.

11 Q Do you want to take a second to look through all the
12 pages?

13 A Sure.

14 Q Okay. And you can just look up at me when you're
15 ready.

16 A Will do.

17 (Pause in proceedings to review document.)

18 A Okay.

19 Q Matt, is there a Dave's Redistricting link in this
20 email?

21 A There is, yes.

22 Q Did you draw -- Did you produce this Dave's
23 Redistricting link?

24 A I did, yes.

25 Q And why did you include a Dave's Redistricting link

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1 in this email?

2 A That was standard practice to share within the team
3 so that everything could view the maps, but then it also
4 appears based on this email that the intention was
5 possibly to publish in the press release as well so that
6 the public could view it there as well.

7 Q Okay. I am going to copy and go to that Dave's
8 Redistricting link now.

9 (Map displayed.)

10 Q Matt, can you see --

11 A I can, yes.

12 Q -- the Dave's Redistricting? Okay.

13 Matt, did you draw this map?

14 MS. GOLDMAN: Objection, lack of
15 foundation.

16 A It does look broadly similar to maps that I drew.
17 Again, without being able to look at specific census block
18 lines and all of that, yes.

19 Q (By Ms. Waknin) I mean, we can zoom in on the census
20 blocks.

21 A Again, I --

22 Q What is the title?

23 A Just -- This does look broadly similar to maps that
24 I drew. It's been a year, and I don't know that the link
25 hasn't -- You know, something hasn't happened to the link

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1 or anything.

2 Q Can you read the title of this map for me?

3 A Commissioner Walkinshaw Updated LD Proposal.

4 Q Okay. And what does this title mean?

5 A It's Commissioner Walkinshaw's Updated Legislative
6 District proposal. So this was the map prepared for the
7 second public release.

8 Q And what was different about this map than the
9 September Walkinshaw release?

10 A I would refer to the end of the email, the draft
11 press release has a list of it looks like 15 differences.
12 Again, not having the two maps directly to compare, I
13 would say that from reviewing it that list of 15 items
14 seems like a fair summary of the changes between the two
15 maps.

16 Q And can you read for me what No. 1 is on this, on
17 the 15 changes?

18 A Yes. "No. 1, Has a VRA-compliant majority Hispanic
19 14th Legislative District in the Yakima Valley that
20 includes the entire Yakama Nation Reservation."

21 Q Okay. And why was Legislative District 14 drawn in
22 this way?

23 A Again, in order to comply with the VRA analysis
24 provided by Dr. Barreto.

25 Q And why did you include Wapato and Toppenish in this

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1 map?

2 A As before, Wapato and Toppenish are very heavily
3 Hispanic cities, and so in creating a Hispanic majority
4 district they will by necessity need to be part of such a
5 district.

6 Q Did you assess whether this map includes a Latino
7 opportunity district?

8 MS. GOLDMAN: Objection, calls for a legal
9 conclusion.

10 A Yeah, again, not really my area of expertise. I
11 certainly looked at the demographics provided by Dave's.

12 Q (By Ms. Waknin) Did anyone on the Walkinshaw team
13 assess whether this map included a Latino opportunity
14 district?

15 MS. GOLDMAN: Objection, calls for
16 speculation.

17 MS. FRANKLIN: Objection, lacks foundation.

18 A I guess I would characterize it as the Walkinshaw
19 team, we were all confident that the district met the
20 guidelines of the federal VRA.

21 Q (By Ms. Waknin) And why were you all confident that
22 this map guidelines met the federal VRA?

23 MS. GOLDMAN: Objection, calls for a legal
24 conclusion.

25 A The district was majority Hispanic by CVAP, and past

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1 electoral performance indicated it was likely to elect
2 candidates of the Hispanic majorities in that district's
3 choice.

4 Q (By Ms. Waknin) Did you personally share this map
5 with anyone?

6 A Certainly the people included in the email, the --
7 the larger, if you will, Walkinshaw team, you know,
8 including Paulette.

9 I would imagine -- I cannot specifically recall, but
10 I would expect that we also shared this map with Senator
11 Billig and Senator Pedersen prior to release.

12 Q To your knowledge did any of the other
13 commissioners -- so Commissioner Fain or Graves -- see
14 this map?

15 MS. GOLDMAN: Objection.

16 MR. HOLT: Objection, form.

17 MS. GOLDMAN: Calls for speculation.

18 A Prior to publication Commissioner Sims may have. I
19 don't believe that Commissioners Graves or Fain did see
20 it.

21 Q (By Ms. Waknin) Did any of the other commissioners
22 see this map post publication?

23 MS. GOLDMAN: Objection, calls for
24 speculation.

25 MS. FRANKLIN: Objection, lacks foundation.

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1 A Yeah, it was publicly available. I can't speak to
2 whether they saw it or not.

3 Q (By Ms. Waknin) Did you receive any feedback from
4 outside -- Strike that.

5 Did you receive any feedback from folks not on
6 Commissioner Walkinshaw's team regarding this map?

7 A I cannot recall any specific feedback.

8 Q All right. I'm going to --

9 Jeanne, do you want to take a picture, a screenshot?

10 THE REPORTER: Yes, just a moment. Got it.
11 Thank you.

12 MS. WAKNIN: You're welcome.

13 (Screenshot No. 3 taken.)

14 MS. WAKNIN: I'm going to stop sharing now.
15 It is 11:40. We've been going for a while. I think this
16 is a good time to take a lunch break. I'm thinking a
17 45-minute lunch break.

18 Does that work for folks?

19 MS. GOLDMAN: Our lunch is scheduled to
20 show up here in about 20 minutes, so it would be my
21 preference that we go until noon our time.

22 MS. WAKNIN: Okay. So do you mind if we
23 just take -- I'm going to take a five-minute break then.
24 We'll come back, and we'll go until noon. Okay?

25 MS. GOLDMAN: Sure.

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1 MR. HOLT: And Sonni, are you planning on
2 kind of going the distance today with seven hours
3 questioning, or kind of what's your estimate?

4 MS. WAKNIN: No, I don't plan on going --
5 Matt, good news for you --

6 Wait, one second. Jeanne, are we off the record?

7 THE REPORTER: We are on the record, but we
8 can go off.

9 MS. WAKNIN: We can go off the record.

10 (Discussion off the record.)

11 (Break 11:39 a.m. to 11:47 a.m.)

12 Q (By Ms. Waknin) Matt, after Commissioner Walkinshaw
13 and Commissioner Sims published their second Legislative
14 District maps publicly, what did you do next?

15 A From that point forward the process really turned to
16 negotiations between the various commissioners. And so as
17 before, my job was primarily just drawing maps, and so I
18 would take input largely from Ali. She was the one in
19 more of the meetings, and work that into, you know,
20 various map proposals alternatives, things of that nature.

21 Q Were you in negotiation meetings with
22 Commissioner Walkinshaw and other commissioners with
23 respect to the Legislative District maps?

24 A No.

25 Q Who were in those meetings? Who was in those

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1 meetings?

2 MR. HOLT: Objection, form.

3 A So I wasn't there, so I don't know specifically; but
4 our -- For the Walkinshaw team our -- essentially all of
5 the information was funneled through Ali, and I believe
6 she was in most of those meetings where Commissioner
7 Walkinshaw was there.

8 Q (By Ms. Waknin) Did Ali -- And when you say Ali, are
9 you referring to Ali O'Neil?

10 A Correct, Ali O'Neil.

11 Q Okay. Did Ms. O'Neil provide readouts to you about
12 what was happening in negotiations?

13 A Not in any detailed way, but yes, we would get
14 information, you know, some sort of highlights of the
15 tenor of the conversations. And then as negotiations
16 proceeded she would bring specific metrics for specific
17 districts that we would then try to meet in map form.

18 Q Is it fair to say then that your understanding of
19 how negotiations were going was information given to you
20 by Ali O'Neil?

21 A Yes.

22 Q Did you have conversations during the negotiation
23 period with Commissioner Walkinshaw?

24 A I'm sure that it happened, but very, very few and
25 very infrequently.

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1 Q Why did you have very few and very infrequent
2 meetings with Commissioner Walkinshaw during the
3 negotiation period?

4 MR. HOLT: Objection, form.

5 A The meetings didn't get scheduled, I guess, for lack
6 of a better way to say it.

7 Q (By Ms. Waknin) What was the main method of
8 communication between you, Ali O'Neil, Adam Hall and
9 Adam Bartz during the negotiation period?

10 A I don't think I can characterize there being one
11 main. We communicated via phone calls, texts, Teams
12 chats. It was sort of across the board. And we had
13 in-person meetings as well.

14 Q Were you all talking a lot on the Walkinshaw team
15 during the negotiation period?

16 A Yes.

17 Q And when I say negotiation period, how do you
18 understand what I'm talking about?

19 A Given the conversation we just had, I would say from
20 the time of the release of the second Democratic proposals
21 for the Legislative District maps and when the final
22 proposals were published on whatever -- I can't remember
23 the date -- November 17th or 18th.

24 Q So it's fair to say post October 22nd to
25 November 15th?

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1 A Well, it was beyond November 15th that negotiations
2 were still happening, but yes for the October 22nd. And
3 then the 16th or 17th I would say was the end time.

4 Q What do you mean that negotiations were still
5 happening after November 15th?

6 A The maps had not been finalized as of midnight on
7 the end of the 15th. So negotiations were still occurring
8 at least the morning of the 16th, and I can't remember how
9 much, if any, beyond that.

10 Q Did the Commission state that they had passed
11 Legislative District maps on the night of November 15th?

12 MS. FRANKLIN: Objection, lacks foundation.

13 A Yes, I believe they did shortly after midnight state
14 that that is what they had voted on.

15 Q (By Ms. Waknin) And it's your understanding that the
16 parameters of the map, the Legislative District map,
17 however, were still being negotiated on post the agreed
18 upon date of when the maps were approved?

19 A Correct. Yes.

20 MS. GOLDMAN: Objection as to form.

21 Q (By Ms. Waknin) Can you say that again on the
22 record?

23 A Correct. Yes.

24 Q Why was that your understanding?

25 A I was still getting requests to modify maps and meet

1 specific performance targets after midnight.

2 Q Okay. How would you characterize the negotiation
3 period within the Walkinshaw team?

4 A I think again frustration is probably the primary
5 feeling about that time period.

6 Q Would you use any other descriptors?

7 A No, not really.

8 Q Matt, why was frustration the prime descriptor that
9 you would use to characterize the negotiation period?

10 A From the perspective of what I was trying to do with
11 the maps, it seemed clear to me that none of the other
12 caucuses were concerned with the requirements in the RCW
13 for minimizing county splits and city splits and the other
14 requirements in the RCW, and they were negotiating purely
15 on political performance metrics.

16 And again, I didn't view that as the charge of the
17 Commission.

18 Q Was there frustration by you towards the other
19 caucuses on their concept of complying with the federal
20 Voting Rights Act?

21 A Certainly that frustration still existed, yes. As
22 negotiations continued, I think that had largely been
23 internalized as not going to change.

24 Q And why do you say it was internalized as something
25 that was not going to change?

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1 A I would say that conversation happened earlier. So
2 again, that was, you know, around that October 18th
3 Dr. Barreto report, the October 22nd conversation and the
4 October 25th map release.

5 Clarity around that, where everybody stood on that
6 issue I think was pretty apparent by the end of October.
7 The issues around the state RCWs surfaced later -- for me,
8 at any rate.

9 Q And when you say everybody, are you referring to all
10 of the commissioners?

11 A Yeah, I think that's fair to say.

12 Q And what was your -- What was your understanding of
13 where Commissioner Graves stood on the application of the
14 federal Voting Rights Act at that time?

15 MS. GOLDMAN: Objection, calls for
16 speculation.

17 MS. FRANKLIN: Objection, lacks foundation.

18 MR. HOLT: Objection.

19 Q (By Ms. Waknin) You can answer.

20 MR. HOLT: Objection, form.

21 A I had seen no indication that his opinion was
22 different than that of the map that he initially produced
23 and published in September.

24 Q (By Ms. Waknin) And the map that Commissioner Graves
25 produced in September was not compliant with the federal

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1 Voting Rights Act as you understood it; is that correct?

2 MS. GOLDMAN: Objection, calls for a legal
3 conclusion.

4 A Yes.

5 MS. WAKNIN: It is 11:57. I don't want to
6 start my next line of questioning right before we're going
7 to have lunch, so why don't we go off the record.

8 (Discussion off the record.)

9 (Break 11:57 a.m. to 12:47 p.m.)

10 MS. WAKNIN: All right. Let's get back on
11 the record then.

12 Q (By Ms. Waknin) Okay. Matt, before the break I
13 think we had a conversation about, you know -- correct me
14 if I'm misusing this word, but the frustration you had
15 during the negotiation process in the 2021 redistricting
16 process.

17 MS. GOLDMAN: I'm sorry. What is your
18 question?

19 Q (By Ms. Waknin) Is that correct?

20 A Yes, that is correct, that I was frustrated during
21 that process.

22 MS. WAKNIN: Okay. I'm going to pull up
23 Exhibit 6. It is an email from Matt Bridges forwarded
24 from Ali O'Neil to Brady Walkinshaw.

25 (Bridges Exhibit No. 6 introduced.)

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1 MS. GOLDMAN: And is the underlying email
2 dated November 3rd, 2021?

3 MS. WAKNIN: Correct.

4 Q (By Ms. Waknin) Matt, do you have Exhibit 6 in front
5 of you right now?

6 A I do, yes.

7 Q Okay. Can you tell me what Exhibit 6 is in front of
8 you?

9 A It is an email that Ali forwarded, Ali O'Neil
10 forwarded to Brady Walkinshaw. The underlying email I
11 sent to her, Adam Hall, Adam Bartz and Paulette Avalos on
12 Wednesday, November 3rd.

13 Q Okay. And can you tell me what the subject of the
14 email you sent to Ali O'Neil, Adam Hall, Adam Bartz and
15 Paulette Avalos is?

16 A It says LD Offer from Graves.

17 Q And LD, by referring to LD did you mean Legislative
18 District?

19 A I would -- Yes, that is the typical shorthand.

20 Q Okay. Good. And do you mind reading from, Hi All"
21 to the Dave's link for me?

22 A Yes. "Hi All. This is apparently an LD offer from
23 Graves. It was sent in Autobound; I converted to DRA, but
24 because not all of the districts had assignments, DRA
25 thinks there are less districts. That makes the pop dev

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1 counts wrong, but you can otherwise explore demographics,
2 city lines, partisan performance, et cetera."

3 Q Okay. Had Commissioner Graves sent Legislative
4 District offers to the Walkinshaw team prior to this
5 email?

6 A Not that I am aware of.

7 Q What was the impetus, if you remember, for why you
8 got a Legislative District offer from Commissioner Graves?

9 MS. GOLDMAN: Objection, calls for
10 speculation.

11 A I don't have any insight into that.

12 MS. WAKNIN: I'm going to go and copy this
13 Dave's redistricting link and pull it up, and I will share
14 it with you all.

15 (Map displayed.)

16 Q Okay. Do you see my screen?

17 A I do, yes.

18 Q Okay. Can you read the title of this map for me?

19 A It says Graves LD 14 (2).

20 Q And this is a map that was in the autoBoundEDGE
21 shape file that you had then converted into Dave's
22 Redistricting; is that correct?

23 A That is what the email says. I don't have a
24 recollection of that, but that seems plausible.

25 Q Okay. Had you had -- Had you taken maps that were

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1 done in autoBoundEDGE and converted them and put them into
2 Dave's Redistricting before?

3 A Yes.

4 Q Okay. Does that at all -- When you convert a map
5 from autoBoundEDGE to Dave's Redistricting, does that
6 change the shapefile of the map in any way?

7 A It shouldn't, no.

8 Q Are you familiar with autoBoundEDGE?

9 A Familiar, yes.

10 Q Do you know what demographic metrics are available
11 on autoBoundEDGE?

12 A It depends what you load into it. Unlike -- Unlike
13 Dave's, autoBoundEDGE is just essentially a tool. It's a
14 piece of software. And so you can load any demographic or
15 electoral or, you know, whatever data you want into it.

16 Q Did you receive an autoBoundEDGE software package
17 when you started on the redistricting?

18 A Yes.

19 Q Okay. Was there data auto uploaded to the
20 autoBoundEDGE that you had received?

21 A Yes, I believe so.

22 Q And so I'm just going to go back to the map right
23 here. Just one second.

24 And so for district details I'm going to look at
25 District 14. Do you see District 14 on your screen?

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1 A Yes.

2 Q Okay. And can you read for me what the citizen VAP
3 2019 is for the Hispanic population?

4 A Yeah. It's 37,095 people, which represents 50.6
5 percent of CVAP.

6 Q Okay. And can you read to me the governor 2020
7 Democratic percentage?

8 A 20,940, 53.9 percent.

9 Q And based off of the district details that Dave's
10 Redistricting is showing right now, that means that in
11 2020 in this proposed District 14 the Democratic candidate
12 would have received 53.9 percent of the vote?

13 A Correct.

14 Q Would that mean that in this district the Democratic
15 candidate would have won the district --

16 A Well, --

17 Q -- for the governor's race?

18 A Yes, for the governor's race. Yes.

19 Q Okay. And this was a proposal from -- a Legislative
20 District map proposal from Commissioner Graves to
21 Commissioner Walkinshaw; is that correct?

22 A I very much doubt that. I suspect that this map was
23 further modified by me or our team to see how we could
24 work with a proposal that Representative Graves submitted
25 would be my assumption.

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1 Q I'm going to stop sharing for a second, and I want
2 to go back to that email. So it says, "Hi All. This is
3 apparently an LD offer from Graves. It was sent in
4 Autobound Edge, and I converted to DRA." [as read]

5 Is that Dave's Redistricting?

6 A Correct.

7 Q Yes. So you say, "That makes the pop deviation
8 counts wrong, but you can otherwise explore demographics,
9 city lines, partisan performance, et cetera."

10 Nowhere in this email does it say that you modified
11 the map; is that correct?

12 MS. GOLDMAN: Objection, it speaks for
13 itself.

14 Q (By Ms. Waknin) You can answer.

15 A So yes, as of 9:48 and 53 seconds p.m. on Wednesday,
16 November 3rd of 2021, I do not believe I had modified the
17 map.

18 Q Okay. And so do you have any reason to believe that
19 you had modified this Dave's map that I had just shown
20 you?

21 A Well, yeah, looking at the map I do not believe that
22 that would have been an offer from Representative Graves.

23 Q Can you tell me why you don't believe that this was
24 an offer from Representative Graves?

25 A The district performance would not be something that

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1 I suspect he would have supported in an offer.

2 Q And why do you say that?

3 A He was working for the House Republican Caucus, and
4 I don't believe that Republicans would have so easily
5 volunteered that district on November 3rd.

6 Q Was there at any point an offer from
7 Commissioner Graves during the negotiation process to
8 Commissioner Walkinshaw where Commissioner Graves had
9 proposed a Legislative District 14 that complied with the
10 Voting Rights Act as you understood it?

11 A Not to my recollection.

12 MS. FRANKLIN: Objection, lacks foundation,
13 and to the extent it calls for a legal conclusion. Sorry
14 to interrupt.

15 Q (By Ms. Waknin) Matt, if you could just state your
16 answer again for the record.

17 A Not to my recollection, no.

18 Q Did Commissioner Fain ever provide during the
19 negotiation process to Commissioner Walkinshaw a
20 Legislative District map with District 14 -- with a Voting
21 Rights Act compliant Latino opportunity district during
22 the negotiation process?

23 MS. FRANKLIN: Same objection.

24 MS. GOLDMAN: Objection, calls for a legal
25 conclusion.

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1 A Not to my recollection, no.

2 Q (By Ms. Waknin) And it was your belief -- Strike
3 that.

4 Why do you think that Commissioners Graves and Fain
5 did not provide a VRA-compliant Legislative District map
6 as an offer in the negotiation process to Commissioner
7 Walkinshaw?

8 MS. FRANKLIN: Objection, lacks foundation.

9 MR. HOLT: Objection.

10 MS. FRANKLIN: Calls for speculation, and
11 calls for a legal conclusion. Sorry.

12 A Yeah, I would have no input into the thought
13 process. In terms of why I don't expect that it happened,
14 I just don't think on November 3rd we would have been that
15 far down the negotiation path regardless.

16 Q (By Ms. Waknin) What was happening around
17 November 3rd as to why that would inform why you don't
18 think that would be where you were in the negotiation
19 process?

20 A Well, the second round of Democratic maps had only
21 been released about a week earlier, and I think -- My
22 recollection is that it wasn't for another probably until
23 the following week that things really started to heat up.

24 Q And what do you mean by when you say things started
25 to heat up?

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1 A Negotiations happening at a faster pace and with
2 more give from both sides.

3 Q When negotiations were happening at a faster pace
4 were you still drawing maps during that period?

5 A Yes.

6 Q So I'm going to screen share again. Okay. And I'm
7 going to go back to Graves LD 14 (2).

8 (Map displayed.)

9 Q If this is a proposal from Commissioner Graves to
10 Commissioner Walkinshaw that you did not edit, do you
11 think that this is a -- this District 14 would perform for
12 Latino candidates of choice?

13 MS. GOLDMAN: Objection, calls for
14 speculation and for a legal conclusion.

15 A I honestly don't really know.

16 Q (By Ms. Waknin) With respect to the governor's race,
17 do you think the governor's race 2020 that we viewed
18 earlier, which -- do you think that this would be a
19 district proposal that would allow Latinos to elect their
20 candidates of choice?

21 MS. GOLDMAN: Objection, calls for a legal
22 conclusion, and lack of foundation. Calls for
23 speculation.

24 A Based on the -- You know, based on the statistics in
25 front of me here, yes.

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1 Q (By Ms. Waknin) And is that because the -- Strike
2 that.

3 MS. WAKNIN: Jeanne, do you want me to take
4 a screen shot?

5 THE REPORTER: I'll take one. Thank you.

6 (Screenshot No. 4 taken.)

7 Q Did you ever respond to the proposal by
8 Commissioner Graves?

9 A I do not believe I ever communicated with anyone on
10 either Commissioner Graves' or Commissioner Fain's teams.

11 Q Did you communicate within the Walkinshaw team about
12 this proposal from Commissioner Graves?

13 A Certainly I emailed this out. Beyond that I expect
14 so, but I don't have any specific memory one way or
15 another.

16 (Attorney Drew Stokesbary joined the Zoom proceedings.)

17 (Attorney Dallin Holt left the Zoom proceedings.)

18 Q Did you speak with Commissioner Walkinshaw about
19 this proposal from Commissioner Graves?

20 A I don't recall. I doubt it.

21 Q Why do you doubt it?

22 A I had -- During this time period I had very little
23 communication with Commissioner Walkinshaw.

24 Q Did you ever attempt to take this proposed 14th
25 Legislative District and add it or use it for future

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1 proposals from the Walkinshaw team?

2 A I strongly suspect that we would have attempted to
3 incorporate it into maps, but I don't have a specific
4 recollection one way or another.

5 Q Did Commissioner Walkinshaw ever send a response to
6 Commissioner Graves with a counterproposal with this
7 Legislative District 14 within it?

8 MS. GOLDMAN: Objection, calls for
9 speculation.

10 MS. FRANKLIN: Objection, lacks foundation.
11 Sorry.

12 A I don't know.

13 MS. WAKNIN: I am going to pull up
14 Exhibit 7. It is an email from November 8, 2021.

15 (Bridges Exhibit No. 7 introduced.)

16 Q (By Ms. Waknin) And do you have that in front of
17 you, Matt?

18 A I do. Yes.

19 Q All right. Matt, can you tell me what this document
20 is in front of you?

21 A It's again an email that Ali O'Neil forwarded to
22 Brady Walkinshaw and also April Sims this time, originally
23 sent by me to Ali O'Neil, Adam Bartz, Adam Hall and
24 Paulette Avalos, and the subject line is Fain LD map.

25 Q And can you read the email for me?

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1 A "The long-awaited Fain LD map. I have not done any
2 analysis yet." And then there's a Dave's link.

3 Q Okay. And I'm going to go to that Dave's link.

4 (Map displayed.)

5 Q Can you see my screen?

6 A Yes.

7 Q Okay. And I'm going to put the district lines on
8 and take the county lines and city lines off so you can
9 see the map better, the district better.

10 Okay. Can you read for me the title of this map?

11 A Fain V2.

12 Q And do you remember this map, Matt?

13 A Not in detail, but it does look familiar, yes.

14 Q And can you read to me what the citizen voting age
15 population for District 14 is?

16 A For Hispanics it's 10,797, or 10.1 percent of the
17 population.

18 Q Okay. So would you say on this proposal District 14
19 is not a majority Latino citizen voting age population
20 district?

21 A According to this data, yes.

22 Q So I'm going to go over -- Can you read the citizen
23 voting age population 2019 for District 15 for me, please,
24 for the Hispanic population?

25 A 35,652, or 50.6 percent of the population.

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1 Q Okay. And this map has then District 15 is the
2 Hispanic majority district; is that correct?

3 A According to this data, yes.

4 Q Okay. And then can you read for me the governor's
5 2020 metric race?

6 A In percentages the Democrat gets 50.8 percent, the
7 Republican 48.9 percent.

8 Q Okay. So on this map in District 15 in the governor
9 2020 race the Democrat would have won the district; is
10 that correct?

11 A According to this data, yes.

12 Q And this was a proposal from Commissioner Fain;
13 correct?

14 A I believe so, yes.

15 Q And so in Commissioner Fain's V2 proposal
16 Commissioner Fain has a Legislative District that is
17 majority citizen voting age percent Hispanic and has at
18 least in one race, the governor 2020 race, a Democrat
19 winning the district; is that correct?

20 A According to this data, yes.

21 Q Okay. So would you think that this map, according
22 to the data I've just shown you, would have been a
23 compliant VRA district --

24 MS. GOLDMAN: Objection.

25 Q (By Ms. Waknin) -- under the metrics that you

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1 used --

2 MS. GOLDMAN: Objection.

3 Q (By Ms. Waknin) -- In the 2021 redistricting?

4 MS. GOLDMAN: Objection.

5 MS. FRANKLIN: Objection.

6 MS. GOLDMAN: Calls for a legal conclusion,
7 calls for speculation, lack of foundation.

8 A Yeah, I -- I don't feel like it's clear to me one
9 way or another.

10 Q (By Ms. Waknin) So why don't we look at then
11 presidential. Okay. So in the presidential race in 2020
12 can you read for me the Democratic percentage?

13 A Yeah. It looks like 52.4 percent.

14 Q And what did the Republican candidate get?

15 A 45.1 percent.

16 Q And what are the Latino candidates of choice in
17 Eastern Washington?

18 A Generally speaking, historically Hispanic -- Latino
19 communities favor Democrats.

20 Q Okay. In partisan races; is that correct?

21 A Correct.

22 Q Okay. And you were just looking at partisan races;
23 is that correct?

24 A Yes.

25 Q Okay. And so this map has -- Does this map have

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1 some of the aspects that the Walkinshaw team looked at for
2 whether or not a district was a Latino performing
3 opportunity district?

4 MS. GOLDMAN: Objection, vague and
5 ambiguous, calls for speculation, and calls for a legal
6 conclusion.

7 A I would characterize it as much closer than prior
8 publicly produced maps were.

9 MS. WAKNIN: I'm going to let Jeanne
10 screenshot this map.

11 THE REPORTER: Okay. Just a moment. Thank
12 you.

13 (Screenshot No. 5 taken.)

14 Q How did you respond when you received this proposal
15 from Commissioner Fain's team?

16 A I don't remember.

17 Q How did the Walkinshaw team respond to this proposal
18 when you received it from Commissioner Fain's team?

19 A I also don't have a specific recollection for this
20 specific offer.

21 Q Did you speak to Commissioner Walkinshaw at all
22 about this proposal from Commissioner Fain's team?

23 A Not that I can recall. And I doubt it, but I can't
24 say for certain.

25 Q Did you attempt to take the Commissioner Fain's

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1 proposal that was included in the map that we just looked
2 at and add to it or use it for future proposals by
3 Commissioner Walkinshaw?

4 A I can't -- I don't know specifically, but I would
5 expect so.

6 Q And why do you expect so?

7 A That's essentially what my entire job was at that
8 point in the process.

9 Q Did Commissioner Walkinshaw send a response to
10 Commissioner Fain during negotiations about the LD 15 that
11 Commissioner Fain had proposed in the November 8th map?

12 MS. GOLDMAN: Objection, calls for
13 speculation.

14 MS. FRANKLIN: Objection, lacks foundation.

15 A I don't know.

16 Q (By Ms. Waknin) What happened next after
17 Commissioner Fain provided you with his Fain V2 proposal
18 that he titled it on November 8th?

19 A I don't remember a specific timeline of events at
20 that point. Again, at that point we're within about a
21 week of the deadline, and so there was a lot of
22 back-and-forth going on.

23 And so I was certainly drafting modified maps, you
24 know, discussing proposals with the Walkinshaw team, but I
25 don't have a specific recollection of a response to the

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1 Fain map.

2 MS. WAKNIN: So I am going to introduce
3 another map, Exhibit 9. It's a live map, though I will
4 have --

5 Jeanne, can you take a screenshot of this and label
6 this Exhibit 9.

7 (Screenshot taken.)

8 (Discussion with court reporter.)

9 (Bridges Exhibit No. 8 introduced and displayed.)

10 Q (By Ms. Waknin) Matt, are you familiar with this
11 map?

12 MS. GOLDMAN: Objection, calls for
13 speculation.

14 A The basic outlines of many of the districts look
15 familiar.

16 Q (By Ms. Waknin) I am going to represent to you that
17 we subpoenaed Dave's Redistricting for maps related to
18 your account, and we received this mapping proposal.

19 Can you read the title of this map for me?

20 A "11/9 AM Proposal, Weaker LD 14 and 42."

21 Q What does this map title mean?

22 A It's a map that we finalized for discussion on the
23 morning of November 9th, and the purpose -- or the
24 differences in the map were weakening Democratic
25 performance in the 14th and 42nd Legislative Districts.

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1 Q Why were you weakening performance in the 14th and
2 42nd Legislative Districts?

3 A We were working to come to an agreement with the
4 Republican commissioners.

5 Q And why was weakening performance in the 14th and 42
6 Legislative Districts important to coming to a negotiation
7 with the Republican commissioners?

8 A Well, as with any bipartisan negotiation, both sides
9 are not going to get what they want, and by weakening the
10 14th and 42nd that necessarily strengthens the Republican
11 position in those districts.

12 Q So did any of the Republican commissioners ask
13 Commissioner Walkinshaw and his team to provide for them
14 Legislative District proposals that provided a weakened
15 14th and 42nd District?

16 MS. GOLDMAN: Objection, compound, calls
17 for speculation.

18 A I do not know one way or another.

19 Q (By Ms. Waknin) Let's look at District 14. Can you
20 read for me the voting age population 2020 in District 14
21 for Hispanics?

22 A It's 70,908 I think that says, and 67.1 percent of
23 the population.

24 Q And can you read for me what the Hispanic citizen
25 voting age population 2019 data is?

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1 A It looks like 36,349 and 50.4 percent.

2 Q Okay. And the Democratic -- Can you read for me the
3 governor 2020 Democratic percentage?

4 A Yes. 52.1 percent.

5 Q And so in your Legislative District 14, even a
6 weakened LD 14, the Democratic gubernatorial candidate won
7 the district; is that correct?

8 A According to this data, yes.

9 Q Why in a weakened version of 14 did you still have a
10 Democratic candidate winning the district?

11 A We were attempting to provide proposals that met the
12 strictures of the federal Voting Rights Act in this area.

13 Q And so in your opinion, recognizing that you are not
14 a lawyer, your understanding then was to have a performing
15 district to elect candidates of Latino -- to have a
16 performing district the district had to vote Democrat; is
17 that correct?

18 MS. GOLDMAN: Objection.

19 MS. FRANKLIN: Objection.

20 MS. GOLDMAN: Calls for a legal conclusion.

21 A My understanding was that a district needed to show
22 that electing the candidates of choice in the Hispanic
23 community, which in this case were Democrats, was
24 something that was feasible.

25 Q (By Ms. Waknin) What is it about the 42nd District

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1 that made it -- that made it an issue or a conversation
2 between the Republican caucus and the Democratic caucus?

3 A It's one of the most competitive districts in the
4 state in terms of elections.

5 Q And why is it so competitive?

6 MS. GOLDMAN: Objection, calls for
7 speculation, lack of foundation.

8 A I guess the population is pretty evenly split
9 between people who prefer Democrats and people who prefer
10 Republicans.

11 Q (By Ms. Wakin) And on the proposed, on the 11/9 AM
12 Proposed Weaker LD 14 and 42 map, acknowledging that
13 you're not a lawyer, what metrics or data did you look at
14 in determining if the district was likely in your view to
15 comply with the VRA?

16 MS. GOLDMAN: Objection, calls for a legal
17 conclusion, and lack of foundation. And I don't know if
18 you're aware, but the map is no longer in front of him.

19 MS. WAKIN: Oh, sorry.

20 MS. FRANKLIN: And objection, compound.

21 (Map displayed.)

22 A I think the two primary components that we were
23 working with were maintaining a majority CVAP Hispanic
24 population and maintaining electoral performance in the
25 district.

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1 Q (By Ms. Waknin) Okay. Did you share the 11 AM --
2 the 11/9 AM Proposal with anyone on the Walkinshaw team?

3 A I don't recall specifically, but I strongly suspect
4 that I shared it with the entire Walkinshaw team -- not
5 Walkinshaw himself necessarily. Again, that communication
6 essentially all happened through Ali, but for the rest of
7 the team.

8 Q Did you receive any feedback from the Walkinshaw
9 team on that map?

10 A I don't recall specifically. I would imagine so,
11 but I don't have specifics.

12 Q Did anyone from the Commissioner Walkinshaw team
13 tell you that they were sharing the map with anyone
14 outside of the team?

15 A I cannot recall one way or another.

16 Q Okay. Can you -- We're going to go back to
17 Exhibit 2, page 25.

18 MS. GOLDMAN: That's the one we're going to
19 need you to share.

20 MS. WAKNIN: Yeah.

21 MS. GOLDMAN: We don't have it. We don't
22 have it. No, that's three. This is the one --

23 MS. WAKNIN: It's the 800-page document.

24 THE WITNESS: Oh, gotcha.

25 MS. WAKNIN: That's why you don't have it.

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1 Trying to save some trees.

2 MS. FRANKLIN: And can you repeat the page
3 number, Sonni?

4 MS. WAKNIN: It's Exhibit 2, page 25.

5 MS. FRANKLIN: Thank you.

6 (Exhibit No. 2 displayed.)

7 Q (By Ms. Waknin) All right. Matt, can you identify
8 this email in front of you?

9 A It's an email from Ali O'Neil to Brady Walkinshaw
10 cc'ing another Brady Walkinshaw email account, with a
11 subject line forward Walkinshaw 11/10 Leg Map New VRA.

12 Q And I'm going to scroll down onto the page. You can
13 see Ali -- Can you identify this email, the second email?

14 A It's an email from Ali O'Neil to Paul Campos with
15 the same basic subject line, Walkinshaw 11/10 Leg Map New
16 VRA.

17 Q Did you draw the Walkinshaw 11/10 Leg Map New VRA?

18 A I can't recall specifically, but probably so, yes.

19 Q Okay. Well, I'm going to go to the Dave's
20 Redistricting link.

21 (Map displayed.)

22 Q Matt, can you identify this map?

23 MS. GOLDMAN: Objection, calls for
24 speculation.

25 A The title of the map is BW -- what do you call that,

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1 greater sign -- Fain 11/10 New VRA.

2 Q And did you draw this map?

3 A It looks very similar to maps that I drew, so I
4 would expect yes.

5 Q And I'm going to put the district lines on for
6 everyone to see. So let's go to District 14.

7 Can you read for me the voting age population 2020
8 in District 14?

9 A For the Hispanic community it's 72,522, or
10 68.6 percent.

11 Q And can you read for me the governor 2020 Democratic
12 election?

13 A It looks like 57.3 percent.

14 Q And I'm going to include -- I'm putting on the
15 citizen VAP 2019. Can you read for me what the Hispanic
16 citizen VAP 2019 is?

17 A Yes. I believe it's 38,181, although I believe --
18 it's a little blurry, and 52.6 percent.

19 Q And Wapato and Toppenish are included in the
20 majority Hispanic district in this map; is that correct?

21 A Yeah. Certainly -- I don't -- You know, the city
22 lines aren't on, but from -- It looks so. It appears so,
23 yes.

24 Q Okay. I can put the city lines in.

25 A Yes.

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1 Q Okay. And this map also has part of the City of
2 Pasco in it; is that correct?

3 A That's correct, yes.

4 Q Are you familiar with the City of Pasco?

5 A I mean, not in any unique sense.

6 Q What do you know about the City of Pasco?

7 A It's the largest city in Franklin County and has a
8 substantial Hispanic population.

9 Q And do you know why Ali would be sharing this map
10 with Paul Campos?

11 MS. GOLDMAN: Objection, calls for
12 speculation.

13 A Well, you know, again, this map was from
14 November 10th. We're within five days of the deadline,
15 and so working on negotiating would be my speculation.

16 Q (By Ms. Waknin) Did Ali O'Neil have a conversation
17 with you about sharing Legislative District maps with
18 Commissioner Fain's team?

19 A I cannot recall specifically, but I would imagine
20 so, yes.

21 Q I'm going to pull up Exhibit 9, which is another
22 Dave's Redistricting link.

23 (Map displayed.)

24 Q Matt, I'm going to represent to you that this was a
25 map produced by Dave's Redistricting in connection to your

1 Dave's Redistricting account, and that this map was
2 created at 11/11/2021.

3 Are you familiar with this map?

4 MS. GOLDMAN: Objection, lack of
5 foundation, calls for speculation.

6 A The general outlines of the districts look familiar.

7 Q (By Ms. Waknin) Can you read the title for me of
8 this map?

9 A D-Only Commission Vote.

10 Q What does that mean?

11 A This was a speculative map for what a legislative
12 map might look like that both Democratic commissioners
13 could vote for in the case that an agreement was not
14 reached.

15 Q What do you mean by in the case if an agreement was
16 not reached?

17 A At this point in the process we were pretty close to
18 the deadline, and it was not clear that the commissioners
19 would be able to come to an agreement.

20 Q And so what was the purpose of this map then?

21 A It was in furtherance of the goals that we had
22 earlier, in the earlier maps that we talked about this
23 morning, of attempting to find a map that both Democratic
24 commissioners could approve of.

25 Q And functionally if only both Democratic

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1 commissioners approve of this map, what would it have done
2 for negotiation?

3 A Well, it would not have done anything for
4 negotiations because at that point negotiations would have
5 concluded. The Redistricting Commission was set to expire
6 at the end of the day on November 15th.

7 Q Okay. And so was this map one that the Democrats
8 were just preparing to have as a backup map in case the
9 Commission was unable to come to an agreement?

10 MS. GOLDMAN: Objection, asked and
11 answered.

12 A Yeah, I don't think I have anything in particular
13 more to add. We were -- The Walkinshaw team was working
14 on trying to find a map that both Commissioner Sims and
15 Commissioner Walkinshaw could approve of.

16 Q (By Ms. Waknin) Why didn't Commissioner Sims approve
17 of this map?

18 MS. FRANKLIN: Objection, lacks foundation.

19 MS. GOLDMAN: Objection, calls for
20 speculation.

21 A I did not have any conversations with her to -- on
22 this map.

23 Q (By Ms. Waknin) Did someone from Commissioner Sims's
24 team express to you that this was an acceptable map to
25 Commissioner Sims?

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1 A I'm sorry, expressed that it was or wasn't?

2 Q It was an acceptable map.

3 A No, it was never expressed that this was acceptable.

4 Q All right.

5 MS. WAKNIN: Jeanne, I'm going to let you
6 take a screenshot.

7 (Screenshot taken.)

8 (Bridges Exhibit No. 9 introduced.)

9 Q (By Ms. Waknin) During the final week of negotiation
10 what was your understanding of how the commissioners
11 treated compliance with the Voting Rights Act in the
12 Yakima Valley area?

13 MS. GOLDMAN: Objection, vague, and calls
14 for a legal conclusion.

15 MS. FRANKLIN: Objection, lacks foundation.

16 A In terms of the work that I was asked to do, it
17 reflected a sense that that was one among many priorities
18 for the various commissioners.

19 Q (By Ms. Waknin) And what were the other priorities
20 for the various commissioners that you understood?

21 MS. FRANKLIN: Lacks foundation.

22 A The -- Primarily political performance was certainly
23 the top priority, and then there were specific district
24 lines outside of the Yakima Valley area where
25 commissioners had specific goals in mind for district

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1 lines.

2 Q (By Ms. Waknin) Did you ever get the impression that
3 Commissioner Sims believed that it was okay to approve of
4 a Legislative District that did not allow Latino voters to
5 elect candidates of choice in the Yakima Valley region so
6 long as the Latino citizen voting age population was over
7 50 percent?

8 MR. STOKESBARY: Objection, compound.

9 MS. GOLDMAN: Objection, vague.

10 MS. FRANKLIN: Objection, lacks foundation,
11 calls for speculation.

12 A What do you mean by okay, I guess, is --

13 Q (By Ms. Waknin) Did you get the impression that
14 Commissioner Sims thought it was acceptable to vote for a
15 Legislative District proposal that did not allow Latinos
16 to elect candidates of choice in the Yakima Valley region
17 so long as the Legislative District had over 50 percent
18 Latino citizen voting age population?

19 MS. GOLDMAN: Objection, calls for
20 speculation, and vague.

21 A That was my understanding, yes.

22 Q (By Ms. Waknin) And what do you base that
23 understanding off of?

24 A Based on the conversations that we had with the Sims
25 team, there were other priorities that took precedence;

1 and if they could achieve those priorities, that priority
2 was not as critical.

3 Q What was your role on Commissioner Walkinshaw's team
4 from November 12th to November 15th, 2021?

5 MS. GOLDMAN: Objection, asked and
6 answered.

7 A So as before, I was largely doing data analytics and
8 map drawing, and so requests for broad maps and specific
9 line changes, again largely through -- funneled via Ali,
10 would come to me, and I would rework lines to produce the
11 map proposals.

12 Q (By Ms. Waknin) Did Ali O'Neil ever tell you that
13 Commissioner Walkinshaw and Commissioner Fain were having
14 conversations about a Voting Rights Act compliant district
15 on the Legislative District map in the Yakima Valley
16 region from November 12th to November 15th?

17 A I cannot recall.

18 Q Did Adam Hall tell you if Commissioner Walkinshaw
19 and Commissioner Fain were having conversations about a
20 VRA-compliant district in the Yakima Valley region for the
21 Legislative District map?

22 A I cannot recall.

23 Q Did Ali O'Neil ever tell you if Commissioner
24 Walkinshaw and Commissioner Graves were having
25 conversations about a VRA-compliant district on the

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1 Legislative District map in the Yakima Valley region
2 during the final week of negotiation?

3 A I can't recall.

4 Q Did Adam Hall ever tell you if Commissioner Graves
5 and Commissioner Walkinshaw were having conversations
6 about a VRA-compliant district in the Yakima Valley region
7 during the final week of negotiation?

8 A I can't recall.

9 Q Were there any conversations that you were privy to
10 between Commissioner Walkinshaw's team about the
11 possibility that the final Legislative District map would
12 not include a Voting Rights Act compliant district during
13 the final week of negotiation?

14 A Yes.

15 Q What was said during those conversations?

16 A Again, I would characterize it again as a lot of
17 frustration from all members of the Walkinshaw team that
18 it was being considered as an acceptable outcome.

19 Q And is that because the Walkinshaw team viewed
20 compliance with the federal Voting Rights Act as mandatory
21 for the Legislative District maps?

22 MS. GOLDMAN: Objection, calls for a legal
23 conclusion, and calls for speculation.

24 MS. FRANKLIN: Objection, lacks foundation.

25 A Yes.

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1 Q (By Ms. Waknin) Why was the November 15th, 2021 date
2 significant for the Washington Redistricting Commission?

3 A It's the deadline by which the maps have to be
4 approved.

5 Q And to your understanding when you say "maps have to
6 be approved," do you mean physical maps, or do you mean
7 the parameters of a map?

8 MS. GOLDMAN: Objection, calls for a legal
9 conclusion.

10 A I don't know that any -- I would say it needs to be
11 physical on paper, but the census tract block -- block,
12 you know, block or block assignments would need to be in
13 place.

14 Q (By Ms. Waknin) Matt, I'm just going to ask after I
15 ask you a question if you just wait a little bit for your
16 attorney and the other attorneys to object if they have
17 objections so that way we have a clean record.

18 Does that sound okay to you?

19 A Yep.

20 Q Okay. Don't worry. It's only 1:35, so if you have
21 dinner plans tonight, you should still get to them.

22 Did anyone from the Walkinshaw team tell you that
23 there was an agreement on the configuration of Legislative
24 Districts 14 and 15 before November 15th, 2021?

25 A No.

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1 Q Was it your understanding then that Legislative
2 Districts 14 and 15 and a VRA-compliant district in the
3 Yakima Valley region was still something that had to be
4 negotiated on November 15, 2021?

5 MS. FRANKLIN: Objection, lacks foundation,
6 and to the extent that it calls for a legal conclusion.

7 A Yes.

8 Q (By Ms. Waknin) Were you having conversations with
9 Ali O'Neil and Adam Hall that day on a VRA-compliant
10 Legislative District map?

11 MS. GOLDMAN: Objection as to form, vague.

12 A Yes.

13 Q (By Ms. Waknin) And how many conversations on
14 November 15th did you have with Ali O'Neil and Adam Hall
15 about a VRA-compliant Legislative District map?

16 A It would be hard to characterize. Ali was in
17 Federal Way, so those conversations would have been more
18 discrete, although we were also exchanging text messages.

19 Adam Hall for most of that day was -- we were in
20 person together, so it was kind of a continuous
21 conversation.

22 Q What is Federal Way?

23 A Federal Way is a city in south King County where the
24 commissioners were meeting for the last day or two before
25 the deadline, attempting to come to an agreement.

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1 Q And were you with Commissioner Walkinshaw on
2 November 15th, 2021?

3 A I was not.

4 Q How were you receiving information regarding the
5 negotiations on the Legislative District map on
6 November 15th?

7 A Largely via email or on Teams meetings, or text
8 messages to an extent I would say as well.

9 Q Were you still drawing Legislative District maps on
10 the -- during the day on November 15th?

11 A I was, yes.

12 MS. WAKNIN: I am going to introduce an
13 exhibit, and I'm going to represent to you that this is a
14 map that was produced by Dave's Redistricting in
15 connection to your Dave's Redistricting account and that
16 this map was created on 11/15/2021.

17 (Map displayed.)

18 Q Do you recognize this map, Matt?

19 MS. GOLDMAN: Objection, calls for
20 speculation.

21 A Not specifically, but the shape of that 14th
22 District is certainly one that we were discussing, yes.

23 Q (By Ms. Waknin) Okay. And can you read the title of
24 this map for me?

25 A It says Southern LD 14.

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1 Q Do you know what that is in reference to?

2 A This would be a proposed 14th Legislative District
3 that takes the southern path to connect Yakima and Pasco.

4 Q Okay. And can you read for me the citizen VAP 2019
5 for this Legislative District 14?

6 A It looks like 38,181, and 52.6 percent.

7 Q Okay. And can you read for me the composite 2016 to
8 2020 metric?

9 A 59.0 for Democrats, and 40.3 for Republicans.

10 Q Did this map proposal -- Did you share this map
11 proposal with anyone?

12 MS. GOLDMAN: Objection, calls for
13 speculation.

14 A I don't recall.

15 Q (By Ms. Waknin) Would you have shared this map
16 proposal with Adam Hall?

17 MS. GOLDMAN: Objection, calls for
18 speculation.

19 A I would not have hesitated to share it with him. I
20 don't know if I did or not.

21 Q (By Ms. Waknin) Did you assess whether or not this
22 map included a Latino opportunity district to your
23 understanding of what that means?

24 MS. GOLDMAN: Objection, calls for a legal
25 conclusion, and calls for speculation.

1 A That was certainly the goal of the Walkinshaw team
2 during this time for the 14th Legislative District.

3 MS. WAKNIN: I'm going to stop share.

4 (Discussion with court reporter.)

5 (Screenshot taken.)

6 (Bridges Exhibit No. 10 introduced.)

7 Q (By Ms. Waknin) Do you remember what you were doing
8 in the afternoon of November 15, 2021?

9 A So broadly speaking, Ali was relaying to us
10 political performance metrics for various legislative and
11 congressional districts, and we were -- Adam -- I should
12 say Adam Hall, Adam Bartz and I were together in person
13 drawing maps to hit those political performance targets.

14 Q And what were those political performance targets
15 that you were trying to hit?

16 A They were largely based on the 2020 treasurer's
17 race.

18 Q And why were they based on the 2020 treasurer's
19 race?

20 A I was not involved in the conversation to select
21 that result, but it is the -- It was the most generic
22 election of the statewide 2020 elections.

23 Q What do you mean by it was the most generic
24 election?

25 A It did not feature a Democratic incumbent. It was a

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1 pretty -- There were no -- There were no -- It was not a
2 top-of-the-line race. It was most likely to feature a
3 standard Democratic versus Republican matchup without
4 confounding factors.

5 Q So how would you then characterize the 2020
6 presidential race?

7 A In comparison, the 2020 presidential race has much
8 less relevance to legislative races because the top of the
9 ticket tends to be far different from down ticket. And
10 further, presidential races feature more than two
11 candidates, whereas in Washington state the other races
12 only feature two candidates, so the percentages are less
13 applicable.

14 Q And what was the specific metrics for LD 14 and 15
15 for the 2020 treasurer's race that you were all
16 discussing?

17 MS. GOLDMAN: Objection, calls for
18 speculation.

19 A And I don't know that number.

20 Q (By Ms. Waknin) Was it a discussion that the metric
21 had to be in favor of one party or another for the LD --
22 for LD 15 or --

23 MS. GOLDMAN: Objection, vague.

24 A I was not party to the discussion, and so I don't
25 know what conversation happened in the room.

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1 MS. WAKNIN: Okay. I am going to introduce
2 Exhibit 12 -- or 11.

3 THE REPORTER: Eleven.

4 MS. WAKNIN: Eleven. I am going to
5 represent to you that this was a map produced by Dave's
6 Redistricting in regard to your Dave's Redistricting
7 account and that this map was created on 11/15/2021.

8 (Map displayed.)

9 Q Matt, are you familiar with this map?

10 MS. GOLDMAN: Objection, calls for
11 speculation.

12 A Again, the basic outlines of many of the districts
13 look familiar, yes, but I don't remember this map
14 specifically.

15 Q (By Ms. Waknin) And can you read the title of the
16 map for me?

17 A It says Cleanest Possible Map.

18 Q And what does that title mean?

19 A I honestly don't know what that would -- what that
20 was a reference to.

21 Q And does this District 14 look substantially similar
22 to other District 14 proposals by the Walkinshaw team?

23 MS. GOLDMAN: Objection, vague.

24 A In terms of the population -- populations captured
25 by the district, yes, it does.

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1 MS. WAKNIN: I'm going to let Jeanne take a
2 screenshot.

3 (Screenshot taken.)

4 MS. WAKNIN: Thank you.

5 (Bridges Exhibit No. 11 introduced.)

6 Q At any point on November 15th, 2021 did you go to
7 Federal Way?

8 A No, I did not.

9 Q Where exactly were you on November 15th physically
10 then?

11 A In my basement.

12 Q And were you with Adam Hall?

13 A Yes. It's a nice basement.

14 Q And what were you --

15 Did you say it's a nice basement?

16 A Yes.

17 Q That's pretty funny.

18 And what were you and Adam Hall doing on the day of
19 November 15th, 2021?

20 A Adam Bartz was also there. And again, we were
21 receiving information about political metrics to try to
22 hit and working on drawing maps to meet those metrics.

23 Q And what were the metrics that you were trying to
24 hit for LD -- for the Legislative Districts in the Yakima
25 Valley area?

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1 A Those districts by that point had been siloed off
2 from our team.

3 Q What do you mean that they were siloed off from your
4 team?

5 A The Walkinshaw team was no longer part of the
6 negotiation process for that part of the state.

7 Q Why wasn't the Walkinshaw team part of the
8 negotiation process for that part of the state?

9 A I was not in the room, so I don't know.

10 Q At what point did the Walkinshaw team not become --
11 not part of the process for discussing the Yakima Valley
12 region for the Legislative District map on November 15th?

13 MS. GOLDMAN: Objection, calls for
14 speculation, and vague.

15 MS. FRANKLIN: And lack of foundation.

16 A I don't recall the specific timeline on that.

17 Q (By Ms. Wakinin) Just at some point on November 15th
18 the Walkinshaw team was siloed from speaking -- from the
19 Yakima Valley negotiations; is that correct?

20 MS. GOLDMAN: Are you asking me?

21 MS. WAKNIN: I'm asking Matt.

22 MS. GOLDMAN: Oh, I thought you said
23 Jessica.

24 MS. WAKNIN: Oh, no. Sorry. I didn't say
25 your name.

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1 MS. GOLDMAN: I'm sorry.

2 A And --

3 MS. GOLDMAN: I'm sorry. Can I have the
4 question read back, please?

5 THE REPORTER: She said, "Just at some
6 point."

7 MS. GOLDMAN: Oh, just.

8 THE REPORTER: "Just at some point on
9 November 15th the Walkinshaw team was siloed from
10 speaking -- from the Yakima Valley negotiations; is that
11 correct?"

12 MS. GOLDMAN: Objection, calls for
13 speculation.

14 A And I would say that I -- Again, I was not in
15 Federal Way, so I do not know the tenor of the
16 conversation or content of the conversation there; but we
17 stopped receiving metrics for that area, as I recall,
18 fairly early in the day that day.

19 Q (By Ms. Waknin) Who -- When you say you stopped
20 receiving metrics for that area, who were you receiving
21 metrics from?

22 A Ali O'Neil.

23 Q Was Ms. O'Neil receiving metrics about that -- from
24 the area -- Strike that.

25 Was Ms. O'Neil receiving metrics with respect to the

1 Yakima Valley area on November 15th?

2 MS. GOLDMAN: Objection, calls for
3 speculation.

4 MS. FRANKLIN: Objection, lacks foundation.

5 A I don't know.

6 Q (By Ms. Waknin) What is the basis for your belief
7 that the Walkinshaw team was siloed from negotiations on
8 the Yakima Valley district?

9 A The -- We -- Again, we just -- We stopped receiving
10 metrics, and our understanding was outside of the 3rd
11 Legislative District in Spokane the agreement had been
12 reached that the Democratic commissioners would not
13 continue working on Eastern Washington.

14 But again, I was not in the room, so I don't have
15 any direct knowledge.

16 Q Who told you that there was an agreement reached
17 that the Democratic commissioners would not continue
18 working on Eastern Washington?

19 A Ali.

20 Q And was this because Ms. O'Neil was in the room at
21 the time that that conversation was happening?

22 MS. GOLDMAN: Objection, lack of
23 foundation, calls for speculation, and vague.

24 A And I don't have any particular insight.

25 Q (By Ms. Waknin) Did you have a conversation with

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1 Ali O'Neil on November 15th as to whether the Republican
2 commissioners were still working on their -- on the
3 Eastern Washington portion of the Legislative District
4 map?

5 A In general, certainly yes.

6 Q And what was said during those conversations with
7 Ms. O'Neil?

8 A I can't recall, other than the fact that the
9 Republican commissioners were the ones working on Eastern
10 Washington at that point.

11 Q At any point on November 15th did anyone from the
12 Walkinshaw team tell you that Commissioner Walkinshaw was
13 not going to vote on the Legislative District map?

14 A Not definitively, but yes, that -- that concept was
15 certainly discussed.

16 Q And who was discussing that concept?

17 A I'm sorry?

18 Q Who was discussing that concept with you?

19 A The entire day of November 15th, as far as I can
20 recall, the only people I was having conversations with
21 were Ali O'Neil, Adam Hall and Adam Bartz in regards to
22 the people in the room having those conversations.

23 Toward the end I know we were also in communication
24 with Senators Pedersen and Billig. I believe there may
25 have been conversations with them about Commissioner

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1 Walkinshaw voting no on the maps.

2 Q When did you first learn that there was a deal with
3 respect to the Yakima Valley Legislative Districts on
4 November 15th?

5 A I cannot recall hearing about Yakima -- the
6 Yakima Valley specifically.

7 Q When did you hear that a Legislative District map
8 was agreed upon by Commissioner Walkinshaw?

9 A When he voted in favor of it.

10 Q Did you know prior to Commissioner Walkinshaw voting
11 in favor of the Legislative District map that he was going
12 to vote in favor of the Legislative District map?

13 A No, I did not.

14 Q And at what point in the day was that when you found
15 out -- when he voted yes?

16 A That was approximately 11:59 p.m.

17 Q Did you see the Legislative District map that
18 Commissioner Walkinshaw voted yes upon?

19 A No.

20 Q Did Adam Hall tell you he saw the Legislative
21 District map that Commissioner Walkinshaw had voted upon?

22 A No.

23 Q Did Ali O'Neil tell you she saw the Legislative
24 District map that Commissioner Walkinshaw had voted upon?

25 A No.

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1 Q Did Ali O'Neil tell you that Commissioner Walkinshaw
2 -- Strike that.

3 Did Ali O'Neil tell you about the political metrics
4 of the map that Commissioner Walkinshaw voted yes upon?

5 A Not in full. Certainly some of the district --
6 districts yes, but not in full.

7 Q Did Ali O'Neil mention when she was telling you
8 about the district metrics that Commissioner Walkinshaw
9 voted yes upon about the Yakima Valley district from the
10 Legislative District map?

11 A I can't recall specifically.

12 Q When did you first see the Legislative District map
13 that Commissioner Walkinshaw voted yes upon?

14 A Sometime on November 16th. I can't remember -- I
15 think it was in the evening I want to say of November 16th
16 for the legislative map.

17 Q What was your first reaction when you saw the
18 Legislative District map that Commissioner Walkinshaw
19 voted yes upon?

20 A I don't think I had much of one, to be -- I mean at
21 that point. I was just kind of drained, I guess.

22 MS. WAKNIN: Can we take a ten-minute
23 break?

24 THE WITNESS: Sure.

25 (Break 1:54 p.m. to 2:06 p.m.)

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1 MS. WAKNIN: Okay. Jeanne, can we go back
2 on the record?

3 THE REPORTER: Yes, back on the record.

4 Q (By Ms. Waknin) Matt, did you view the final
5 Legislative District map?

6 A Ever? Yes.

7 Q Can you -- I could not hear you.

8 MS. GOLDMAN: Sorry. I'm messing with the
9 microphone.

10 A Okay. Can you hear me now?

11 Q (By Ms. Waknin) Yes.

12 A I have seen the final map, yes.

13 Q Were any of the Legislative Districts 14 or 15 as
14 Commissioner Walkinshaw's team proposed them incorporated
15 in the final Legislative District map?

16 A No.

17 Q Do you know whose Legislative District 15 or 14 was
18 incorporated in the final Legislative District map?

19 MR. STOKESBARY: Objection as to form.

20 A I don't believe any of the public proposals were in
21 the final map.

22 MS. WAKNIN: I'm going to share my screen.
23 Jeanne, I believe this is Exhibit 12.

24 THE REPORTER: Yes, 12 is next.

25 Q (By Ms. Waknin) So I'm going to show you -- I'm on

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1 the Washington State Redistricting Commission website, and
2 I'm going to click this map.

3 (Map displayed.)

4 (Bridges Exhibit No. 12 introduced.)

5 Q It says Washington State Legislative District map;
6 is that correct?

7 A Correct.

8 Q And do you recognize this as the final Legislative
9 District map?

10 A Again, stipulating that I can't see the specific
11 lines, yes, it broadly looks like it.

12 Q And I apologize, I can't -- For some reason it won't
13 let me zoom in on this map.

14 Did you think that this Legislative District 15 or
15 14 was compliant with the federal Voting Rights Act?

16 MS. GOLDMAN: Objection, calls for a legal
17 conclusion, lack of foundation.

18 A No.

19 Q (By Ms. Wakin) And what do you base that belief off
20 of?

21 A The performance metrics of the district.

22 MS. WAKNIN: And I'm going to stop sharing.

23 THE REPORTER: Oh, wait, I need to get a
24 screenshot of it.

25 MS. WAKNIN: Sorry.

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1 THE REPORTER: If you want to put it back
2 up, I'll take one quick. Okay. Thank you.

3 (Screenshot taken.)

4 MS. WAKNIN: Sure.

5 Q (By Ms. Waknin) Matt, do you know what those
6 performance metrics were of -- Actually, strike that.

7 What was the -- In the final enacted Legislative
8 District map, do you know which district was the Latino
9 majority district?

10 A I believe it's the 15th Legislative District.

11 Q And does it matter that the Latino majority district
12 is in your opinion 15, numbered 15 rather than 14?

13 MS. GOLDMAN: Objection.

14 MR. STOKESBARY: Objection to form.

15 MS. GOLDMAN: Calls for a legal conclusion.

16 A Within elections for the State Senate it matters
17 because one of the districts, the 14th, elects state
18 senators in presidential years, and the 15th does in
19 midterm years.

20 Q (By Ms. Waknin) And what was it about the metrics of
21 the final Legislative District map that you thought made
22 it noncompliant -- not compliant with the federal Voting
23 Rights Act?

24 MS. GOLDMAN: Objection, calls for a legal
25 conclusion and calls for speculation.

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1 A The district is unlikely to elect Democrats the way
2 it's structured in the final map, and generally speaking
3 the Hispanic population historically has preferred
4 Democratic candidates.

5 Q (By Ms. Waknin) So in your opinion then Legislative
6 District 15 as enacted in the final Legislative District
7 plan would not allow Latinos to elect candidates of choice
8 as you understand it; is that correct?

9 MS. GOLDMAN: Objection.

10 MR. STOKESBARY: Objection as to form.

11 MS. GOLDMAN: Objection to the degree it
12 calls for a legal conclusion.

13 A More or less, yes, I guess.

14 Q (By Ms. Waknin) Were you disappointed when you
15 realized that Commissioner Walkinshaw voted on a map that
16 you thought did not comply with the federal Voting Rights
17 Act of the Legislative Districts?

18 MR. STOKESBARY: Objection, lack of
19 foundation.

20 A Yes.

21 Q (By Ms. Waknin) And why were you disappointed?

22 A I think that the role of the Commission is to adhere
23 to both the federal Voting Rights Act and the state laws
24 surrounding development of the maps.

25 Q To your knowledge did the Walkinshaw -- strike that.

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1 Did anyone tell you that this map would -- the final
2 Legislative District map would be protected in litigation?

3 MS. GOLDMAN: Objection as to form.

4 A Can you restate the question?

5 Q (By Ms. Waknin) Sure. I'm actually just going to
6 show you something. Do you see what's up on the screen?

7 A I do, yes.

8 Q Okay. I'm going to represent to you that this is a
9 text message that was produced by Ali O'Neil, and it says
10 between Ali O'Neil, Aaron Wasser, Paulette Avalos, Matt
11 Bridges. Do you see that?

12 A Yes.

13 Q And Aaron Wasser says, "The final did not include a
14 VRA-compliant 14th, I thought." And someone writes, "It
15 did not." And you write, "It did not;" is that correct?

16 A Yes.

17 Q And can you read for me starting from, "Just one" to
18 "Yep"?

19 A It says, "Just one the Republicans knew would
20 protect them in litigation." And then I responded,
21 "Graves will claim it does, yep."

22 Q Okay. So I'm going to stop share.

23 What did you mean by that?

24 A That because the district CVAP is majority Hispanic,
25 it meets that metric of the federal VRA.

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1 Q And so was it your understanding that some
2 commissioners on the Redistricting Commission just
3 believed that a compliant district would just need to meet
4 a 50 percent threshold?

5 MS. GOLDMAN: Objection, calls for
6 speculation.

7 MS. FRANKLIN: Objection, lacks foundation.

8 A Effectively, yes.

9 Q (By Ms. Waknin) Did anyone tell you of conversations
10 about where Commissioner Graves stated that the district
11 had to have a higher than 50 percent Hispanic CVAP but
12 could elect non-Latino candidates of choice and still
13 comply with the federal Voting Rights Act?

14 A I can't recall either way.

15 Q Why did you feel -- Why did you say that Graves will
16 claim it does with regard to the 15th Legislative
17 District?

18 A I can't remember the context of that comment.

19 Q And then were you disappointed with Commissioner
20 Walkinshaw's position after the final Legislative District
21 maps came out on fighting for a VRA-compliant district?

22 MR. STOKESBARY: Objection as to form.

23 MS. GOLDMAN: Objection, calls for a legal
24 conclusion, and lack of foundation.

25 A Can you repeat the question, disappointed in what

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1 specifically?

2 Q (By Ms. Waknin) You know what, I'm going to rephrase
3 the question.

4 Were you disappointed in Commissioner Walkinshaw
5 with his performance as a commissioner on the 2021
6 redistricting commission with respect to the Legislative
7 District maps?

8 A Yes.

9 Q And why were you disappointed?

10 A I didn't feel that he took the -- understood the
11 gravity of the role that he took, and he chose to make
12 politically expedient decisions.

13 Q Was it a politically expedient decision to vote for
14 the final Legislative District map even if you believed it
15 did not comply with the federal Voting Rights Act?

16 MS. GOLDMAN: Objection, calls for a legal
17 conclusion.

18 MS. FRANKLIN: Objection, vague.

19 A I believe he felt it was.

20 Q (By Ms. Waknin) Did Commissioner Walkinshaw ever
21 express in front of you that he thought the final district
22 was not compliant with the federal Voting Rights Act?

23 A I am not certain either way.

24 Q Did Ali O'Neil or Adam Hall ever express to you that
25 Commissioner Walkinshaw believed that the final

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1 Legislative District map did not comply with the federal
2 Voting Rights Act?

3 A I don't know.

4 Q Did you have concerns that the final negotiation
5 process was shielded from public view?

6 A Yes.

7 Q And what were those concerns?

8 A It doesn't benefit the public at large for the
9 process to be shielded, and it's also a pretty textbook
10 case of issues with the Open Public Meetings Act.

11 Q To your knowledge did the Commission get sued for
12 violations of the Open Public Meetings Act?

13 MS. GOLDMAN: Objection, calls for
14 speculation, and calls for a legal conclusion.

15 A Yes.

16 Q (By Ms. Waknin) And during the final days of
17 negotiation were you concerned that there were violations
18 of the Open Public Meetings Act happening?

19 MS. GOLDMAN: Objection, calls for a legal
20 conclusion.

21 A Yes.

22 Q (By Ms. Waknin) And why did you think that there
23 were violations of the Open Public Meetings Act happening?

24 MS. GOLDMAN: Objection, calls for a legal
25 conclusion.

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1 A There were serial meetings happening on a regular
2 basis where two commissioners would meet and then meet
3 with other commissioners.

4 Q (By Ms. Waknin) So why did you think that that was a
5 violation of the Open Public Meetings Act as you
6 understand it?

7 MS. GOLDMAN: Objection, calls for a legal
8 conclusion.

9 A That's just always -- We get training on the Open
10 Public Meetings Act from my, you know, not redistricting
11 job, and serial public -- or serial meetings of less than
12 a majority of a committee, or in this case a Commission,
13 are always discussed in those trainings.

14 Q (By Ms. Waknin) Did you feel that there was an
15 opportunity to integrate public comment into the final
16 Legislative District map proposal?

17 A Not -- not independent of other considerations in
18 that final couple days, no.

19 Q Did you feel like -- Did you feel that the public
20 had an ability to comment on the final Legislative
21 District map before it was voted on?

22 MS. FRANKLIN: Objection, vague.

23 A No.

24 Q (By Ms. Waknin) Did you get to comment on the final
25 Legislative District map before it was voted upon?

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1 A Not in totality, no.

2 Q Did the public have an opportunity to see the
3 consensus map before it was transmitted to the State
4 Supreme Court?

5 A No.

6 Q Did the public have an opportunity to comment on
7 the -- Strike that.

8 Did you at any point see the agreement on the
9 Legislative District proposal that was voted on on the
10 15th by Commissioner Walkinshaw?

11 A Ever? Ever, yes.

12 Q When did you see that proposal?

13 A On the -- I believe it was the afternoon or evening
14 of November 16th.

15 Q And what did that proposal say?

16 A It was -- It was the maps that were then posted on
17 the redistricting website that you pulled up earlier in
18 testimony.

19 MS. WAKNIN: I am almost done with my
20 questions, so I'm going to just ask for a 10-minute break
21 to go over what I have left. So let's return at 2:30.

22 (Break 2:21 p.m. to 2:29 p.m.)

23 MS. WAKNIN: Back on the record.

24 Well, Matt, I wanted to thank you for being here
25 today and for being a public servant, and I'm going to

1 pass the witness.

2 So I think Erica, you're next.

3 MS. FRANKLIN: We don't have any questions,
4 but thank you.

5 MS. WAKNIN: Okay.

6 MS. FRANKLIN: We also want to echo Sonni's
7 appreciation for you being here.

8 THE WITNESS: Thanks.

9 MR. STOKESBARY: I've got a few questions
10 for you, Matt, if Erica and Sonni are done, and I don't
11 think anybody from the Secretary of State's office is on.

12 E X A M I N A T I O N

13 BY MR. STOKESBARY:

14 Q Matt, I'm Drew Stokesbary. I was not here for the
15 first part of your deposition, but you probably met my
16 co-counsel, Dallin Holt. We represent the
17 Intervenor-Defendants in this case, so I've just got a
18 couple of questions for you.

19 Bear with me. I might try to do a screen share, but
20 that's a little dangerous because I haven't done this in a
21 while. But before I get there, one topic that came up was
22 some mention of the labeling of the 14th versus the 15th
23 Districts.

24 To your recollection as that was being discussed,
25 did any commissioner or any Commission staff ever

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1 reference race in regard to how either of those districts
2 would be labeled, 14th or 15th?

3 A I don't believe so.

4 Q Do you happen to recall the justifications that were
5 given for labeling the 15th the 15th and the 14th the
6 14th?

7 A Well, I think -- So in terms of the maps that the
8 Commission passed, the 15th comprises the -- however you
9 want to say it, the 2011 redistricting cycle maps, more of
10 the population of that 15th carries over into the new
11 15th, and the same for the 14th.

12 Q Okay. I appreciate that.

13 I also think at one point earlier there was some
14 discussion about turnout changes, and would you say that
15 Latino turnout increases from non-presidential years to
16 presidential years?

17 A Yes.

18 Q Would you also say that non-Latino White turnout
19 increases from non-presidential to presidential years?

20 A Yes.

21 Q Okay. Here's where I want to try to do a screen
22 shot, but maybe I don't need to.

23 So let me ask you this. Have you had a chance to
24 review legislative election results for the 2022 November
25 election in the 15th Legislative District?

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1 A I have -- not in depth. I've seen them, yes.

2 Q Okay. And let's see if I can do this. Bear with
3 me. All right. I have not given Zoom -- I got a new
4 laptop a few weeks ago. I've not given Zoom permission to
5 share screen, so I will abandon this idea.

6 I'm going to represent to you that in the race for
7 the 15th District State Senate seat in the November, 2022
8 general election Nikki Torres, who preferred the
9 Republican party, received 67.68 percent of the vote, and
10 Lindsey Keesling, who preferred the Democratic party,
11 received 32.09 percent of the vote.

12 Does this at least sound vaguely familiar with what
13 you might have seen or reviewed --

14 A Yes.

15 MS. WAKNIN: Objection, form.

16 Q (By Mr. Stokesbary) -- or be consistent with?

17 Okay. And do you have -- again, I can't share my
18 screen here to show the Dave's Redistricting map, but do
19 you recall roughly what the Latino CVAP percentage was for
20 the 15th District --

21 MS. WAKNIN: Objection --

22 A -- that the Commission had enacted?

23 MS. WAKNIN: Objection, form.

24 A I believe that it was approximately 50.1 percent.

25 Q (By Mr. Stokesbary) So if, based on your experience

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1 in politics, your expertise in map drawing, if Latino CVAP
2 percentage is about 51 percent and a Republican candidate
3 had received 67.68 percent, what are some inferences that
4 you might draw from those two facts?

5 MS. WAKNIN: Objection, foundation.
6 Objection, speculation. Objection, incomplete
7 hypothetical.

8 A So I would need to see precinct level results before
9 being able to weigh in on that at all.

10 Q (By Mr. Stokesbary) At one point you mentioned,
11 Matt, that Latino candidates of choice in the Yakima
12 Valley or the 15th District was generally for Democratic
13 candidates. Am I recalling that correctly?

14 A Yeah. Historically speaking, yes.

15 Q But would you say that all Latino voters in the 15th
16 District preferred Democratic candidates?

17 A No.

18 Q Do you think that there could be scenarios where
19 Latino voters in the 15th District might prefer a
20 Republican candidate over a Democratic candidate?

21 MS. WAKNIN: Objection, form.

22 A Sure.

23 Q (By Mr. Stokesbary) Do you happen to know -- So if
24 I'm recalling correctly, the map was finalized by the
25 Commission before the 2022 CVAP numbers were released by

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1 the census.

2 Do you know whether -- now that the 2020 numbers
3 have been released, do you know whether the Latino CVAP
4 percentage in the 15th District has gone up relative to
5 the 2019 CVAP percentage?

6 A I don't know that.

7 MS. WAKNIN: Object, form. Objection,
8 speculation.

9 A I don't know.

10 Q (By Mr. Stokesbary) Okay. Hold on. I'm just
11 looking at my notes.

12 In your conversations with Dr. Barreto or anyone
13 else that you might have talked with during the process,
14 did Dr. Barreto or anyone else speculate as to whether the
15 Latino CVAP percentage might be expected to grow, shrink,
16 or stay steady over time in the 15th Legislative District?

17 MS. WAKNIN: Objection, lack of foundation.

18 A Yes. Dr. Barreto did indicate that it was likely
19 that the Hispanic CVAP percentage would increase over
20 time.

21 Q (By Mr. Stokesbary) Do you recall did he give a
22 magnitude of how he expected that to grow over time?

23 A Not that I can specifically recall.

24 Q Okay. So then I guess my last question, it's a bit
25 open ended, and this is the part where I might have missed

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1 some earlier discussion, so apologies if I'm repeating
2 something you might have already shared; but could you
3 elaborate on your knowledge of how the Commission agreed
4 on a map that was slightly majority Latino CVAP but also
5 slightly majority Republican?

6 MS. FRANKLIN: Objection, vague.

7 MS. WAKNIN: Objection, form.

8 MS. GOLDMAN: Objection, calls for
9 speculation.

10 A So I was not in -- As I've said, I was not in the
11 room or in the hotel in Federal Way when these final
12 decisions were being made, and so I can't speak to what
13 exactly was said or what -- you know, what the decision
14 was.

15 Q (By Mr. Stokesbary) Was your sense that there was
16 some kind of deal in that regard?

17 MS. GOLDMAN: Objection as to form.

18 MS. FRANKLIN: Objection, lacks foundation.

19 MS. WAKNIN: Objection, form.

20 A My only understanding was that outside -- again,
21 outside of the 3rd Legislative District in Spokane, the
22 Eastern Washington portion of drawing the lines had been
23 turned over to the Republican commissioners.

24 MR. STOKESBARY: Okay. That's all the
25 questions I have for you, Matt. And I will echo what my

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1 other counsel said -- the other counsel said. Thank you
2 very much for your service to the state, and thank you for
3 appearing here today.

4 THE WITNESS: Thank you.

5 MS. GOLDMAN: We reserve signature.

6 (Deposition concluded at 2:39 p.m.)

7 (Signature reserved.)

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LAKESIDE REPORTING (833) 365-3376

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1 C E R T I F I C A T E

2 STATE OF WASHINGTON)
) SS
 3 County of King)

4 I, the undersigned Washington Certified Court
 Reporter, pursuant to RCW 5.28.010 authorized to
 5 administer oaths and affirmations in and for the State of
 Washington, do hereby certify:

6 That the annexed and foregoing deposition of the
 witness named herein was taken stenographically before me
 7 and reduced to typewritten form under my direction.

I further certify that the witness examined will be
 8 given an opportunity to review and sign their deposition
 after the same is transcribed, unless indicated in the
 9 record that the parties and witness waived the signing.

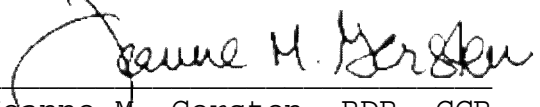
I further certify that all objections made at the
 10 time of said examination to my qualifications or the
 manner of taking the deposition or to the conduct of any
 11 party have been noted by me upon the deposition.

I further certify that I am not a relative or an
 12 employee or attorney or counsel of any of the parties to
 said action, or a relative or employee of any such
 13 attorney or counsel, and that I am not financially
 interested in the said action or the outcome thereof.

I further certify that the witness before examination
 14 was by me duly sworn to testify the truth, the whole
 15 truth, and nothing but the truth.

I further certify that the deposition, as
 16 transcribed, is a full, true and correct transcript of the
 testimony, including questions and answers and all
 17 objections, motions and exceptions of counsel made and
 taken at the time of the foregoing examination and was
 18 prepared pursuant to Washington Administrative Code
 308-14-135, the transcript preparation format guideline.

19 IN WITNESS WHEREOF, I have hereunto set my hand and this
 20 17th day of December, 2022.

21 
 22 Jeanne M. Gersten, RDR, CCR
 Registered Diplomat Reporter
 23 Washington CCR No. 2711
 License effective until April 2, 2023
 24 Residing at Seattle, Washington
 25



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1 CHANGE/SIGNATURE SHEET

2 I, the undersigned, MATTHEW J. BRIDGES, hereby
 3 certify that I have read the foregoing deposition and
 4 that, to the best of my knowledge, said deposition is true
 and accurate, with the exception of the following
 corrections listed below:

5	PAGE	LINE	CHANGE	REASON
6				
7				
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15				
16				
17				
18				

Signature

Date

19
 20 Witness: Matthew J. Bridges
 Soto Palmer, et al. v. Hobbs, et al.
 21 USDC Western District of Washington at Seattle
 Cause No. 3:22-cv-05035-RSL
 22 Date: December 9, 2022

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