

Soto Palmer, et al.

v.

Hobbs, et al.

\* \* \* \* \*

Remote Deposition Upon Oral Examination of  
Heliodora Morfin  
December 6, 2022

\* \* \* \* \*

REPORTED BY:

LAKESIDE REPORTING

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Heliodora Morfin

December 6, 2022

Page 1

Page 2

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, ) No. 3:22-cv-05035-RSL  
Defendants, )  
and )  
JOSE TREVINO, ISMAEL G. CAMPOS, )  
and State Representative )  
ALEX YBARRA, )  
Intervenor-Defendants. )  
REMOTE DEPOSITION UPON ORAL EXAMINATION OF  
HELIODORA MORFIN

Tuesday, December 6, 2022  
9:06 a.m. to 9:49 a.m.

REPORTED BY: LAKESIDE REPORTING  
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(Continued on next page)

Page 3

Page 4

APPEARANCES, continued:  
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\*\*\*\*\*  
EXAMINATION INDEX  
HELIODORA MORFIN PAGE  
By Mr. Bowen 5  
\*\*\*\*\*  
EXHIBIT  
NUMBER DESCRIPTION INTRODUCED  
1 Screenshot of Elections & Voting November 8, 2022 General Election for Legislative District 15 20

December 6, 2022, Remote Proceedings:  
PROCEEDINGS: 9:06 a.m.  
(Discussion off the record.)  
HELIODORA MORFIN,  
having been sworn/affirmed on oath to tell the truth, the whole truth, and nothing but the truth, testified as follows:  
MR. BOWEN: Okay. I know that I noted this up front for everybody, but I just want to get on the record that there have been some internet outages in our office park the last few days, and we're currently working on fixing it; and I hope it's not a problem today, but if I lose connection I just ask that everyone would wait and see if we can reestablish connectivity. If not, I have a hot spot that may work if it's just not enough bandwidth to get this done. I'll send out an email, and we can keep the deposition open and just reschedule for a different time to finish if it looks like we can't resolve whatever connectivity issues might come up.  
Also, in previous depositions we've agreed that an objection by one preserves it for all.  
Is everybody still okay with that today?  
MS. LEEPER: (Nodded.)  
MR. BOWEN: All right. I'm going to take the silence as --

1 (Pages 1 to 4)

Soto Palmer, et al. v. Hobbs, et al.  
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Heliodora Morfin

December 6, 2022

Page 5	Page 6
<p>1 MS. LEEPER: We are.</p> <p>2 MR. HUGHES: Yes.</p> <p>3 MR. BOWEN: Okay. Perfect. Thank you.</p> <p>4 E X A M I N A T I O N</p> <p>5 BY MR. BOWEN:</p> <p>6 Q Well, good morning, Ms. Morfin. My name is</p> <p>7 Brennan Bowen. I'm an associate with Holtzman Vogel, and</p> <p>8 we represent the Intervenor-Defendants in this matter.</p> <p>9 I just wanted to thank you for your time today, and</p> <p>10 I'm going to try to keep this as short and as painless as</p> <p>11 possible. My plan is to start off with some general</p> <p>12 questions about your background and yourself, and then I'm</p> <p>13 going to discuss the specifics of this case.</p> <p>14 Could you please state your full name on the record</p> <p>15 for me?</p> <p>16 A Yes. Heliodora Morfin.</p> <p>17 Q Okay. And is there anything you prefer to be</p> <p>18 called?</p> <p>19 A Dora.</p> <p>20 Q Dora. All right, Dora. Have you ever been deposed</p> <p>21 before, Dora?</p> <p>22 A No.</p> <p>23 Q Okay. I'm just going to lay out some ground rules</p> <p>24 before we get started. First, I know we have a</p> <p>25 stenographer here, but is there anyone else recording</p>	<p>1 this?</p> <p>2 A I don't believe so.</p> <p>3 Q No? Okay. And I know that Zoom has a mute</p> <p>4 function. I'm going to ask that during our deposition</p> <p>5 that you don't use that unless it's clear that we're</p> <p>6 taking a break or doing something like that. Okay?</p> <p>7 A Okay.</p> <p>8 Q Is there anyone in the room with you who is not on</p> <p>9 camera?</p> <p>10 MR. MORFIN: Just me. Edwardo Morfin,</p> <p>11 Morfin Law Firm.</p> <p>12 MR. BOWEN: Edwardo, good to meet you.</p> <p>13 Q (By Mr. Bowen) Do you have any applications open on</p> <p>14 your computer that someone could use to communicate with</p> <p>15 you during the deposition, aside from Zoom?</p> <p>16 A No.</p> <p>17 Q Okay. Do you have any phones, tablets, any things</p> <p>18 like that that are within eyesight that someone could use</p> <p>19 to communicate with you during the deposition?</p> <p>20 A No, I don't.</p> <p>21 Q Okay. Since we're on Zoom I'm going to be</p> <p>22 especially cautious not to talk over you or anyone else,</p> <p>23 and I ask that you do the same. We'll give each other a</p> <p>24 couple seconds pause in between asking and answering</p> <p>25 questions. It will help the court reporter get everything</p>
Page 7	Page 8
<p>1 down. It will also give anybody time for objections.</p> <p>2 Much as I would love it if there were none, I'm sure we'll</p> <p>3 have objections today, so we'll let them voice the</p> <p>4 objections.</p> <p>5 All responses are going to have to be audible. So I</p> <p>6 know in a normal conversation we shake and nod our heads,</p> <p>7 and there's hand gestures. None of that is getting into</p> <p>8 the record. So even if it's just a simple yes or no, just</p> <p>9 make sure to say it as opposed to nodding or shaking your</p> <p>10 head.</p> <p>11 Do you understand that you are under oath today?</p> <p>12 A Yes.</p> <p>13 Q Okay. And that oath has the same effect as if you</p> <p>14 were in court. Do you understand that as well?</p> <p>15 A Yes.</p> <p>16 Q Okay. If my questions are unclear, then please let</p> <p>17 me know and I'll try to clarify them. If you answer, I'm</p> <p>18 going to assume that you understood them.</p> <p>19 Does that make sense?</p> <p>20 A Yes.</p> <p>21 Q Okay. If your attorney objects today, those are for</p> <p>22 later proceedings. Unless your attorney specifically</p> <p>23 instructs you not to answer, I'm going to ask that you let</p> <p>24 your attorney object, and then you continue to answer my</p> <p>25 question after that objection.</p>	<p>1 Does that make sense?</p> <p>2 A Yes.</p> <p>3 Q Okay. If you need to take a break at any time, just</p> <p>4 let me know. Like I said, I'm hoping this isn't going to</p> <p>5 be a super long thing, but I understand stuff comes up.</p> <p>6 If you need a break, I totally get it. The only thing I</p> <p>7 would ask is that you finish answering whatever question</p> <p>8 we were in the middle of answering. Any pending questions</p> <p>9 I would like to have resolved before we go to break.</p> <p>10 Does that work?</p> <p>11 A Yes.</p> <p>12 Q Okay. And finally, are you on any medication today</p> <p>13 that could affect your ability to fully answer or</p> <p>14 truthfully answer any of these questions, or are you</p> <p>15 otherwise aware of any reason you couldn't fully and</p> <p>16 truthfully answer questions today?</p> <p>17 A I'm not under any medication.</p> <p>18 Q Okay. All right. Thank you.</p> <p>19 Now, other than conversations with your attorneys,</p> <p>20 did you do anything to prepare for today's deposition?</p> <p>21 A No, I did not.</p> <p>22 Q Okay. Did you review anything, any documents?</p> <p>23 A Just through the time that we have been talking to</p> <p>24 our attorneys.</p> <p>25 Q Okay. So you have reviewed the Complaint at some</p>

2 (Pages 5 to 8)

Soto Palmer, et al. v. Hobbs, et al.  
 LAKESIDE REPORTING (833) 365-3376

Heliodora Morfin

December 6, 2022

<p style="text-align: right;">Page 9</p> <p>1 point since filing it?</p> <p>2 A Yes.</p> <p>3 Q Okay. Do you know when about that was?</p> <p>4 A I got a set of documents in July, and we reviewed</p> <p>5 them between July and August. And then I got another set</p> <p>6 of documents within the last few weeks, and we reviewed</p> <p>7 them within the last weeks or so -- so last week.</p> <p>8 Q Okay. And have you spoken to anyone besides your</p> <p>9 attorney about the deposition today?</p> <p>10 A I have not.</p> <p>11 Q Okay. Would you briefly walk me through where you</p> <p>12 have lived for the past ten years or so? I know it's a</p> <p>13 long time, so if you have to take time to think, but just</p> <p>14 like general vicinities of where you've lived.</p> <p>15 A Yes. I've lived in Pasco, in Pasco, Washington.</p> <p>16 And I moved to the Seattle area on and off for ten years,</p> <p>17 and back in the Tri-Cities for the last few years.</p> <p>18 Q Okay. And when you say Tri-Cities, what area would</p> <p>19 that be?</p> <p>20 A Pasco.</p> <p>21 Q Pasco?</p> <p>22 A Yes.</p> <p>23 Q Okay. And what is your current address?</p> <p>24 A 1115 West Irving Street, Pasco, Washington, 99301.</p> <p>25 THE REPORTER: Could you say the street</p>	<p style="text-align: right;">Page 10</p> <p>1 again, please?</p> <p>2 THE WITNESS: Yes. Irving, I-R-V-I-N-G,</p> <p>3 Street, Pasco, Washington, 99301.</p> <p>4 Q Okay. So if I understand this correct, you were in</p> <p>5 Pasco, and then Seattle, Tri-Cities area, and then back</p> <p>6 to -- or Tri-Cities area and back in Pasco; is that</p> <p>7 correct?</p> <p>8 A Yes. I currently live in Pasco.</p> <p>9 Q Okay. Do you recall your address when you were in</p> <p>10 the Seattle area?</p> <p>11 A I don't recall my address, no. I just recall the</p> <p>12 nearby streets.</p> <p>13 Q Okay. What about when you were previously in Pasco,</p> <p>14 do you recall your address then?</p> <p>15 A Yes. 816 South Fourth Lane, Apartment B as in boy,</p> <p>16 Pasco, Washington, 99301.</p> <p>17 Q That's a good memory.</p> <p>18 A Thank you.</p> <p>19 Q You're welcome. Your current address then, under</p> <p>20 your current address what legislative district do you live</p> <p>21 in?</p> <p>22 A Legislative District No. 15.</p> <p>23 Q No. 15. Okay.</p> <p>24 And where did you go to high school?</p> <p>25 A I went to Pasco High, Pasco, Washington.</p>
<p style="text-align: right;">Page 11</p> <p>1 Q Okay. What year did you graduate?</p> <p>2 A 1993.</p> <p>3 Q And then after that did you do any college or</p> <p>4 vocational training?</p> <p>5 A Yes. I did Lake Washington Technical College in the</p> <p>6 Seattle area, and I went to Columbia Basin College and got</p> <p>7 an accounting degree and business degree.</p> <p>8 Q All right. And then after you got your accounting</p> <p>9 and business degree what did you do professionally?</p> <p>10 A I worked in office management, with accounting.</p> <p>11 Q Okay. And is that what you do right now?</p> <p>12 A No, I don't. I'm not doing that now.</p> <p>13 Q What do you do right now?</p> <p>14 A I'm a caregiver.</p> <p>15 Q And how long have you been doing caregiving for?</p> <p>16 A About two years.</p> <p>17 Q About two years. At any point in time have you had</p> <p>18 involvement in the political arena, either like as a</p> <p>19 volunteer or doing anything like that for a political</p> <p>20 campaign?</p> <p>21 A I have volunteered with Latino Civic Alliance in the</p> <p>22 past.</p> <p>23 Q Okay. And when was that?</p> <p>24 A That was back in around 2009.</p> <p>25 Q Okay. And have you done anything with them before</p>	<p style="text-align: right;">Page 12</p> <p>1 or since?</p> <p>2 A Not -- not currently, no.</p> <p>3 Q Okay. What about any other political engagement,</p> <p>4 any other groups you've been involved with?</p> <p>5 A No, not -- nothing I can think of.</p> <p>6 Q Okay. Have you had any professional training or</p> <p>7 education about redistricting specifically?</p> <p>8 A No, not really.</p> <p>9 Q And have you ever worked in government, either state</p> <p>10 or local government?</p> <p>11 A I worked for a local municipality.</p> <p>12 Q What were you -- What municipality were you working</p> <p>13 for?</p> <p>14 A For Clean Air.</p> <p>15 Q Okay. And what was your role there?</p> <p>16 A I did front office, customer service and accounting.</p> <p>17 Q Okay. I'm going to switch a little bit from work</p> <p>18 experience to just some personal background information.</p> <p>19 Could you identify your race for me?</p> <p>20 A Other.</p> <p>21 Q Other. Could you let me know how you identify your</p> <p>22 ethnicity?</p> <p>23 A Mexican.</p> <p>24 Q Mexican. And just to confirm, I think we talked</p> <p>25 about this before when he introduced himself, but the</p>

3 (Pages 9 to 12)

Soto Palmer, et al. v. Hobbs, et al.  
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Heliadora Morfin

December 6, 2022

Page 13	Page 14
<p>1 attorney for plaintiffs' counsel here, Eddie Morfin, that</p> <p>2 is your husband?</p> <p>3 A No. He's part of the attorneys.</p> <p>4 Q He's just part of the attorneys. No relation?</p> <p>5 A No.</p> <p>6 Q Okay. And when did you become aware of the</p> <p>7 Redistricting Commission's existence?</p> <p>8 A I heard about it through previous information in</p> <p>9 Pasco, I would say about five years ago.</p> <p>10 Q And did you attend -- I guess what was the previous</p> <p>11 information you had heard about the Commission?</p> <p>12 A The City of Pasco was being involved in a lawsuit</p> <p>13 for redistricting.</p> <p>14 Q Okay. And that previous commission you heard about,</p> <p>15 was that specific to the City of Pasco, or was that the</p> <p>16 State Redistricting Commission?</p> <p>17 A I really don't know because it's -- It was -- I was</p> <p>18 not informed of -- How can I explain it? I really don't</p> <p>19 know at what level it was.</p> <p>20 Q Okay. That's fine.</p> <p>21 For this Redistricting Commission, the one that drew</p> <p>22 the state maps this go-around, when did you first hear</p> <p>23 about that Commission?</p> <p>24 A I don't remember the exact time, honestly.</p> <p>25 Q Okay. Did you follow what the Commission was doing?</p>	<p>1 A I just really follow what the information we were</p> <p>2 learning about.</p> <p>3 Q Okay. So did you, for example, attend any of the</p> <p>4 public hearings that the Commission held?</p> <p>5 A I did not.</p> <p>6 Q Okay. Did you review any of the publicly released</p> <p>7 information that the Commission put out?</p> <p>8 A Just the information that was provided by our</p> <p>9 attorneys.</p> <p>10 Q Okay. During the process of the Redistricting</p> <p>11 Commission did you submit anything to them, any comments</p> <p>12 or questions about the process?</p> <p>13 A Personally, no.</p> <p>14 Q No. Okay. Could you maybe explain to me how you</p> <p>15 understand the redistricting process to work in the State</p> <p>16 of Washington?</p> <p>17 A I believe it's chosen by the legislative, certain</p> <p>18 maps; and the people that are within those boundaries</p> <p>19 vote, and it gets either approved or denied.</p> <p>20 Q And do you know how many commissioners were on the</p> <p>21 Commission?</p> <p>22 A I don't know.</p> <p>23 Q Okay. Do you recall maybe some of the names of the</p> <p>24 commissioners?</p> <p>25 A I do not.</p>
Page 15	Page 16
<p>1 Q Okay. Would you happen to know how many were say</p> <p>2 Republican versus Democrat?</p> <p>3 A I would not know.</p> <p>4 Q What about the number of nonpartisan chairs on the</p> <p>5 Commission, do you know how many there were?</p> <p>6 A I don't.</p> <p>7 Q Or any of their names?</p> <p>8 A No, I don't. I'm sorry.</p> <p>9 Q That's okay. No need to apologize.</p> <p>10 Did you review the final map that the Commission</p> <p>11 passed?</p> <p>12 A The current map? Yes.</p> <p>13 Q Okay. What was your first impression when you saw</p> <p>14 that map?</p> <p>15 A That it's not the map that we proposed.</p> <p>16 Q When you say we, who is we?</p> <p>17 A Just our group that we suggested.</p> <p>18 Q So there was a group that had suggested a different</p> <p>19 map to the Commission?</p> <p>20 A That the attorneys suggested for us, with us.</p> <p>21 Q Okay. So had you seen the Commission's map before</p> <p>22 this lawsuit was started?</p> <p>23 A No, I did not.</p> <p>24 Q Okay. So how did you come to be involved in the</p> <p>25 lawsuit?</p>	<p>1 A I honestly don't remember exactly how I got</p> <p>2 involved, but once I learned about -- about it, then I</p> <p>3 just became involved.</p> <p>4 Q Okay. Do you remember was there an attorney who</p> <p>5 approached you, or was it a friend?</p> <p>6 A I really don't remember.</p> <p>7 Q Okay. So if I understand right, the Commission</p> <p>8 passed a map. The lawsuit started, and you became</p> <p>9 involved. And at that point you saw the map for the first</p> <p>10 time; is that right?</p> <p>11 A I don't know that it happened in that order. It</p> <p>12 honestly was a long time ago, and I truly don't remember.</p> <p>13 Q Okay. But you hadn't seen the final map until this</p> <p>14 lawsuit was already going and the attorneys approached</p> <p>15 you?</p> <p>16 A I don't believe that's how it happened. I honestly</p> <p>17 would have to go back and think more about it on how it</p> <p>18 happened.</p> <p>19 Q Okay. No rush, but if you just want to take a</p> <p>20 minute to think about it right now, --</p> <p>21 A I need more time.</p> <p>22 Q -- maybe you can try to --</p> <p>23 Okay. Did you review the maps that --</p> <p>24 Oh, I saw your hand.</p> <p>25 A Yeah, I would like to take a small break, please.</p>

4 (Pages 13 to 16)

Soto Palmer, et al. v. Hobbs, et al.  
 LAKESIDE REPORTING (833) 365-3376

Heliodora Morfin

December 6, 2022

Page 17	Page 18
<p>1 MR. BOWEN: Okay. Go ahead. A five-minute</p> <p>2 break, does that work?</p> <p>3 THE WITNESS: Yeah, that would be great.</p> <p>4 MR. BOWEN: Thanks.</p> <p>5 THE WITNESS: Thank you.</p> <p>6 MR. BOWEN: So we'll reconvene in five</p> <p>7 minutes.</p> <p>8 (Break 9:25 a.m. to 9:37 a.m.)</p> <p>9 MR. BOWEN: Okay. Back on the record.</p> <p>10 Q (By Mr. Bowen) When we left off we were talking</p> <p>11 about the final map proposed by the Commission. Before</p> <p>12 the Commission had proposed a final map the individual</p> <p>13 commissioners proposed their own maps.</p> <p>14 Were you able to look at any of the individual</p> <p>15 commissioners' proposed maps?</p> <p>16 A I don't remember.</p> <p>17 Q Okay. Do you know how many maps each commissioner</p> <p>18 proposed?</p> <p>19 A No, I don't.</p> <p>20 Q Could you tell me what the Hispanic citizen voting</p> <p>21 age population percentage was in the final map for the</p> <p>22 15th Legislative District?</p> <p>23 A I don't know that answer.</p> <p>24 Q Okay. Are you familiar with the term citizen voting</p> <p>25 age population?</p>	<p>1 A No, I'm not.</p> <p>2 Q Okay. So is it fair to say then that you wouldn't</p> <p>3 have an opinion about what I'm going to call the CVAP, the</p> <p>4 citizen voting age population, the CVAP for Legislative</p> <p>5 District 15?</p> <p>6 A I'm not understanding your question.</p> <p>7 Q Okay. Let me try to rephrase. There's a percentage</p> <p>8 that tells us how many citizens of voting age in the</p> <p>9 population have any given characteristics. So when I say</p> <p>10 Hispanic citizen voting age population, it means how many</p> <p>11 people in that population who can vote identify as</p> <p>12 Hispanic.</p> <p>13 Does that make sense?</p> <p>14 A Yes.</p> <p>15 Q Are you aware of what that percentage was for the</p> <p>16 15th Legislative District?</p> <p>17 A I don't know.</p> <p>18 Q Okay. In your Amended Complaint you asserted two</p> <p>19 different claims. Could you just tell me about them?</p> <p>20 A I'm not really sure exactly what you're asking me.</p> <p>21 Q Yes. So you guys sued the -- You sued the State of</p> <p>22 Washington and Secretary Hobbs. In that lawsuit, the</p> <p>23 Complaint that was filed, there are two different claims</p> <p>24 you make against them. I was just wondering if you could</p> <p>25 tell me in your own words what you think those are about</p>
Page 19	Page 20
<p>1 or what you think this case is about.</p> <p>2 A I believe that I would like to be represented in my</p> <p>3 district by a person that represents my values.</p> <p>4 Q Okay. And you think the current map does not do</p> <p>5 that?</p> <p>6 A Correct.</p> <p>7 Q Can you explain how the map as it's drawn prevents</p> <p>8 you from electing someone who represents your values?</p> <p>9 A I wouldn't be able to explain all that.</p> <p>10 Q Okay. What are the values that you're looking for</p> <p>11 in an individual to represent you?</p> <p>12 A I would just like the opportunity to have the</p> <p>13 representative of my choice that aligns within the</p> <p>14 boundaries of where I'm at, where I live.</p> <p>15 Q Okay. And talking about a representative of your</p> <p>16 choice, did you vote in this last election that just</p> <p>17 happened a few weeks back, the 2022 midterms?</p> <p>18 A Yes.</p> <p>19 Q Did you vote for a state senator from Legislative</p> <p>20 District 15? Did you vote in that race?</p> <p>21 A I did not.</p> <p>22 Q You did not. Have you previously voted in</p> <p>23 legislative district -- or legislative races for your</p> <p>24 district?</p> <p>25 A Yes, I have.</p>	<p>1 Q Okay. But you did not vote in the 2022 midterm?</p> <p>2 A I did not.</p> <p>3 Q Had you voted could you tell me which of the two</p> <p>4 candidates would have been representative of your choice?</p> <p>5 A In the ballot there was only one representative.</p> <p>6 (Court reporter request to repeat.)</p> <p>7 MR. BOWEN: I'm sorry. What, Jeanne?</p> <p>8 THE REPORTER: I just wanted her to repeat</p> <p>9 her answer. It wasn't clear to me.</p> <p>10 MR. BOWEN: Oh, okay.</p> <p>11 A In my ballot there was only one representative</p> <p>12 choice.</p> <p>13 Q For the state senate race in Legislative District 15</p> <p>14 you only had one representative?</p> <p>15 A In my November ballot, yes.</p> <p>16 Q Okay. I'm going to --</p> <p>17 (Website displayed.)</p> <p>18 MR. BOWEN: Jeanne, are you capable of</p> <p>19 taking a screenshot to send as an exhibit, or would I have</p> <p>20 to do that?</p> <p>21 THE REPORTER: I can take a screenshot.</p> <p>22 (Screenshot taken.)</p> <p>23 MR. BOWEN: Okay. I'd like to admit this</p> <p>24 as Exhibit 1. Let me screen share real quick.</p> <p>25 (Morfin Exhibit No. 1 identified and displayed.)</p>


5 (Pages 17 to 20)

Soto Palmer, et al. v. Hobbs, et al.  
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Heliodora Morfin

December 6, 2022

<p style="text-align: right;">Page 21</p> <p>1 MR. BOWEN: Okay. Is this coming through</p> <p>2 for everybody?</p> <p>3 MS. LEEPER: Yes.</p> <p>4 THE REPORTER: Yes. And I just took a</p> <p>5 screenshot.</p> <p>6 MR. BOWEN: Okay. Thank you, Jeanne.</p> <p>7 Could you put that -- Just so everyone has that, could you</p> <p>8 put that in the chat as well when you have a minute?</p> <p>9 THE REPORTER: Yes. Do you want me to do</p> <p>10 that right now?</p> <p>11 MR. BOWEN: Sure. I guess no, we'll wait</p> <p>12 until the end you can send it, just because everyone can</p> <p>13 see my screen right now.</p> <p>14 THE REPORTER: Okay.</p> <p>15 Q (By Mr. Bowen) Dora, I'm on the Secretary of State's</p> <p>16 website. Is that what you're seeing as well?</p> <p>17 A Yes.</p> <p>18 Q Okay. And can you see right here, this says</p> <p>19 Legislative District 15; correct?</p> <p>20 A Yes.</p> <p>21 Q And this is for the November 8th, 2022 general</p> <p>22 election?</p> <p>23 A Yes, I see that.</p> <p>24 Q Is that right? Okay. And right here what I'm</p> <p>25 highlighting, this says State Senator for Legislative</p>	<p style="text-align: right;">Page 22</p> <p>1 District 15, this first race.</p> <p>2 Do you see that?</p> <p>3 A Yes.</p> <p>4 Q And how many candidates do you see under that race?</p> <p>5 A Two.</p> <p>6 Q Two. And you currently reside in Legislative</p> <p>7 District 15; correct?</p> <p>8 A That's correct.</p> <p>9 Q Okay. Did you see these two candidates on your</p> <p>10 ballot for this state senate seat?</p> <p>11 A I honestly don't remember because I didn't vote for</p> <p>12 the state senator.</p> <p>13 Q Okay. I'm going to stop screen sharing here, if I</p> <p>14 can figure it out. Okay.</p> <p>15 Did you vote for any of the state level candidates</p> <p>16 in Legislative District 15? Let me -- Strike that. Let</p> <p>17 me rephrase.</p> <p>18 Did you vote -- Strike that. I'm going to leave it</p> <p>19 alone.</p> <p>20 How many races would you say that you did not vote</p> <p>21 for on your ballot?</p> <p>22 A I don't remember.</p> <p>23 Q Okay. Going back to you telling me what this case</p> <p>24 is about, you had said that you felt you couldn't elect</p> <p>25 candidates of your choice; is that right?</p>
<p style="text-align: right;">Page 23</p> <p>1 A I don't remember exactly verbatim what I said, but I</p> <p>2 would like to have the opportunity to have a</p> <p>3 representative --</p> <p>4 Q Okay.</p> <p>5 A -- of my choice.</p> <p>6 Q Do you have that opportunity right now?</p> <p>7 A No.</p> <p>8 Q Why do you say that?</p> <p>9 A Because the way that the legislative is set up.</p> <p>10 Q Could you explain more about that?</p> <p>11 MS. LEEPER: Object. That was asked and</p> <p>12 answered.</p> <p>13 Q (By Mr. Bowen) Dora, as we're going through the</p> <p>14 deposition today, is there anything you wish I had asked</p> <p>15 you that you want to talk about?</p> <p>16 A No.</p> <p>17 MR. BOWEN: Okay. Does anyone else have</p> <p>18 any questions?</p> <p>19 (No audible response.)</p> <p>20 MR. BOWEN: Not hearing any, I am going to</p> <p>21 end the deposition. And Dora, I thank you for your time.</p> <p>22 And Jeanne, I think we're good to go off the record</p> <p>23 now.</p> <p>24 (Deposition concluded at 9:49 a.m.)</p> <p>25 (Signature reserved.)</p>	<p style="text-align: right;">Page 24</p> <p>1 CERTIFICATE</p> <p>2 STATE OF WASHINGTON )</p> <p>3 ) SS</p> <p>4 County of King )</p> <p>5 I, the undersigned Washington Certified Court</p> <p>6 Reporter, pursuant to RCW 5.28.010 authorized to</p> <p>7 administer oaths and affirmations in and for the State of</p> <p>8 Washington, do hereby certify:</p> <p>9 That the annexed and foregoing deposition of the</p> <p>10 witness named herein was taken stenographically before me</p> <p>11 and reduced to typewritten form under my direction.</p> <p>12 I further certify that the witness examined will be</p> <p>13 given an opportunity to review and sign their deposition</p> <p>14 after the same is transcribed, unless indicated in the</p> <p>15 record that the parties and witness waived the signing.</p> <p>16 I further certify that all objections made at the</p> <p>17 time of said examination to my qualifications or the</p> <p>18 manner of taking the deposition or to the conduct of any</p> <p>19 party have been noted by me upon the deposition.</p> <p>20 I further certify that I am not a relative or an</p> <p>21 employee or attorney or counsel of any of the parties to</p> <p>22 said action, or a relative or employee of any such</p> <p>23 attorney or counsel, and that I am not financially</p> <p>24 interested in the said action or the outcome thereof.</p> <p>25 I further certify that the witness before examination</p> <p>was by me duly sworn to testify the truth, the whole</p> <p>truth, and nothing but the truth.</p> <p>I further certify that the deposition, as</p> <p>transcribed, is a full, true and correct transcript of the</p> <p>testimony, including questions and answers and all</p> <p>objections, motions and exceptions of counsel made and</p> <p>taken at the time of the foregoing examination and was</p> <p>prepared pursuant to Washington Administrative Code</p> <p>308-14-135, the transcript preparation format guideline.</p> <p>IN WITNESS WHEREOF, I have hereunto set my hand this</p> <p>11th day of December, 2022.</p> <p><i>Jeanne M. Gersten</i></p> <p>Jeanne M. Gersten, RDR, CCR Registered Diplomat Reporter Washington CCR No. 2711 License effective until April 2, 2023 Residing at Seattle, Washington</p> 

6 (Pages 21 to 24)

Soto Palmer, et al. v. Hobbs, et al.  
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Heliadora Morfin

December 6, 2022

Page 25

## 1 CHANGE/SIGNATURE SHEET

2 I, the undersigned, HELIODORA MORFIN, hereby  
 3 certify that I have read the foregoing deposition and  
 4 that, to the best of my knowledge, said deposition is true  
 5 and accurate, with the exception of the following  
 6 corrections listed below:

7 PAGE LINE CHANGE REASON  
 8 \_\_\_\_\_  
 9 \_\_\_\_\_  
 10 \_\_\_\_\_  
 11 \_\_\_\_\_  
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18 \_\_\_\_\_  
 19 Signature Date

20 Witness: Heliadora Morfin

21 Soto Palmer, et al. v. Hobbs, et al.

22 USDC Western District of Washington at Seattle

23 Cause No. 3:22-cv-05035-RSL

24 Date: December 6, 2022

25 Reported by: Jeanne M. Gersten, RDR, CCR No. 2711

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7 (Page 25)

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<b>A</b>	<b>answer</b> 7:17,23 7:24 8:13,14 8:16 17:23 20:9 <b>answered</b> 23:12 <b>answering</b> 6:24 8:7,8 <b>answers</b> 24:16 <b>anybody</b> 7:1 <b>Apartment</b> 10:15 <b>apologize</b> 15:9 <b>APPEARAN...</b> 3:1 <b>applications</b> 6:13 <b>approached</b> 16:5,14 <b>approved</b> 14:19 <b>April</b> 24:23 <b>area</b> 9:16,18 10:5,6,10 11:6 <b>arena</b> 11:18 <b>Arizona</b> 2:6 <b>ASEEM</b> 2:10 <b>aside</b> 6:15 <b>asked</b> 23:11,14 <b>asking</b> 6:24 18:20 <b>asserted</b> 18:18 <b>Assistant</b> 3:3 <b>associate</b> 5:7 <b>assume</b> 7:18 <b>attend</b> 13:10 14:3 <b>attorney</b> 3:3,4 7:21,22,24 9:9 13:1 16:4 24:12,13 <b>attorneys</b> 8:19 8:24 13:3,4 14:9 15:20 16:14 <b>audible</b> 7:5 23:19	<b>August</b> 9:5 <b>authorized</b> 24:4 <b>Avenue</b> 2:23 3:5 <b>aware</b> 8:15 13:6 18:15	<b>B</b> <b>B</b> 3:17 10:15 <b>back</b> 9:17 10:5,6 11:24 16:17 17:9 19:17 22:23 <b>background</b> 5:12 12:18 <b>ballot</b> 20:5,11,15 22:10,21 <b>bandwidth</b> 4:15 <b>Basin</b> 11:6 <b>BBowen@Hol...</b> 2:6 <b>behalf</b> 2:8,16,21 <b>believe</b> 6:2 14:17 16:16 19:2 <b>BEN</b> 2:11 <b>best</b> 25:3 <b>bit</b> 12:17 <b>boundaries</b> 14:18 19:14 <b>Bowen</b> 2:4 3:12 4:8,24 5:3,5,7 6:12,13 17:1,4 17:6,9,10 20:7 20:10,18,23 21:1,6,11,15 23:13,17,20 <b>boy</b> 10:15 <b>BPhillips@Ca...</b> 2:15 <b>break</b> 6:6 8:3,6 8:9 16:25 17:2 17:8 <b>Brennan</b> 2:4 5:7 <b>briefly</b> 9:11 <b>Building</b> 2:18	<b>business</b> 11:7,9	<b>C</b> <b>C</b> 2:1 24:1,1 <b>California</b> 2:19 <b>call</b> 18:3 <b>called</b> 5:18 <b>Camelback</b> 2:5 <b>camera</b> 6:9 <b>campaign</b> 2:8,12 11:20 <b>CAMPOS</b> 1:12 <b>candidates</b> 20:4 22:4,9,15,25 <b>capable</b> 20:18 <b>capacity</b> 1:8 <b>caregiver</b> 11:14 <b>caregiving</b> 11:15 <b>case</b> 5:13 19:1 22:23 <b>Cause</b> 25:21 <b>cautious</b> 6:22 <b>CCR</b> 1:22 24:22 24:23 25:23 <b>CENTER</b> 2:8,12 <b>Center.org</b> 2:14 2:14 <b>certain</b> 14:17 <b>Certified</b> 24:4 <b>certify</b> 24:5,7,9 24:11,14,15 25:2 <b>chairs</b> 15:4 <b>CHANGE</b> 25:5 <b>CHANGE/SI...</b> 25:1 <b>characteristics</b> 18:9 <b>chat</b> 21:8 <b>choice</b> 19:13,16 20:4,12 22:25 23:5 <b>chosen</b> 14:17 <b>citizen</b> 17:20,24 18:4,10	<b>citizens</b> 18:8 <b>City</b> 13:12,15 <b>Civic</b> 11:21 <b>claims</b> 18:19,23 <b>clarify</b> 7:17 <b>Clean</b> 12:14 <b>clear</b> 6:5 20:9 <b>Code</b> 24:18 <b>college</b> 11:3,5,6 <b>Columbia</b> 11:6 <b>come</b> 4:19 15:24 <b>comes</b> 8:5 <b>coming</b> 21:1 <b>comments</b> 14:11 <b>commission</b> 13:11,14,16,21 13:23,25 14:4 14:7,11,21 15:5,10,19 16:7 17:11,12 <b>Commission's</b> 13:7 15:21 <b>commissioner</b> 17:17 <b>commissioners</b> 14:20,24 17:13 <b>commissioners'</b> 17:15 <b>communicate</b> 6:14,19 <b>Complaint</b> 8:25 18:18,23 <b>Complex</b> 3:4 <b>computer</b> 6:14 <b>concluded</b> 23:24 <b>conduct</b> 24:10 <b>confirm</b> 12:24 <b>connection</b> 4:13 4:14,19 <b>Contact@Lak...</b> 1:24 25:25 <b>continue</b> 7:24 <b>continued</b> 2:25 3:1
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<b>conversation</b> 7:6 <b>conversations</b> 8:19 <b>correct</b> 10:4,7 19:6 21:19 22:7,8 24:16 <b>corrections</b> 25:4 <b>counsel</b> 13:1 24:12,13,17 <b>County</b> 24:3 <b>couple</b> 6:24 <b>court</b> 1:3 6:25 7:14 20:6 24:4 <b>current</b> 9:23 10:19,20 15:12 19:4 <b>currently</b> 4:11 10:8 12:2 22:6 <b>customer</b> 12:16 <b>CVAP</b> 18:3,4 <hr/> <b>D</b> <hr/> <b>Date</b> 25:18,22 <b>day</b> 24:20 <b>days</b> 4:11 <b>DC</b> 2:13 <b>December</b> 1:19 4:1 24:20 25:22 <b>DEFENDANT</b> 3:2 <b>Defendants</b> 1:10 <b>degree</b> 11:7,7,9 <b>Democrat</b> 15:2 <b>denied</b> 14:19 <b>deposed</b> 5:20 <b>deposition</b> 1:16 4:17 6:4,15,19 8:20 9:9 23:14 23:21,24 24:6 24:8,10,11,15 25:2,3 <b>depositions</b> 4:20 <b>Deschutes</b> 2:23 <b>DESCRIPTI...</b>	3:18 <b>different</b> 4:17 15:18 18:19,23 <b>Diplomate</b> 1:23 24:22 <b>direction</b> 24:7 <b>discuss</b> 5:13 <b>Discussion</b> 4:3 <b>displayed</b> 20:17 20:25 <b>district</b> 1:3,3 3:20 10:20,22 17:22 18:5,16 19:3,20,23,24 20:13 21:19 22:1,7,16 25:21 <b>Division</b> 3:4 <b>documents</b> 8:22 9:4,6 <b>doing</b> 6:6 11:12 11:15,19 13:25 <b>Dora</b> 5:19,20,20 5:21 21:15 23:13,21 <b>drawn</b> 19:7 <b>drew</b> 13:21 <b>duly</b> 24:14 <hr/> <b>E</b> <hr/> <b>E</b> 2:1,1 3:17 5:4 24:1,1 <b>East</b> 2:5 <b>Eddie</b> 13:1 <b>Eddie@Morfi...</b> 2:24 <b>education</b> 12:7 <b>Edwardo</b> 2:22 6:10,12 <b>effect</b> 7:13 <b>effective</b> 24:23 <b>either</b> 11:18 12:9 14:19 <b>elect</b> 22:24 <b>electing</b> 19:8	<b>election</b> 3:19 19:16 21:22 <b>Elections</b> 3:19 <b>email</b> 4:16 <b>employee</b> 24:12 24:12 <b>engagement</b> 12:3 <b>especially</b> 6:22 <b>Esplanade</b> 2:5 <b>et</b> 1:5 2:8 25:20 25:20 <b>ethnicity</b> 12:22 <b>everybody</b> 4:9 4:22 21:2 <b>exact</b> 13:24 <b>exactly</b> 16:1 18:20 23:1 <b>examination</b> 1:16 3:10 24:10,14,17 <b>examined</b> 24:7 <b>example</b> 14:3 <b>exception</b> 25:3 <b>exceptions</b> 24:17 <b>exhibit</b> 20:19,24 20:25 <b>existence</b> 13:7 <b>experience</b> 12:18 <b>explain</b> 13:18 14:14 19:7,9 23:10 <b>eyesight</b> 6:18 <hr/> <b>F</b> <hr/> <b>F</b> 24:1 <b>fair</b> 18:2 <b>familiar</b> 17:24 <b>felt</b> 22:24 <b>Fifth</b> 3:5 <b>figure</b> 22:14 <b>filed</b> 18:23 <b>filing</b> 9:1 <b>final</b> 15:10	16:13 17:11,12 17:21 <b>finally</b> 8:12 <b>financially</b> 24:13 <b>fine</b> 13:20 <b>finish</b> 4:18 8:7 <b>Firm</b> 2:21,22 6:11 <b>first</b> 5:24 13:22 15:13 16:9 22:1 <b>five</b> 13:9 17:6 <b>five-minute</b> 17:1 <b>fixing</b> 4:12 <b>follow</b> 13:25 14:1 <b>following</b> 25:3 <b>follows</b> 4:7 <b>foregoing</b> 24:6 24:17 25:2 <b>form</b> 24:7 <b>format</b> 24:18 <b>Fourth</b> 10:15 <b>friend</b> 16:5 <b>front</b> 4:9 12:16 <b>full</b> 5:14 24:16 <b>fully</b> 8:13,15 <b>function</b> 6:4 <b>further</b> 24:7,9 24:11,14,15 <hr/> <b>G</b> <hr/> <b>G</b> 1:12 <b>general</b> 3:3,4,19 5:11 9:14 21:21 <b>Gersten</b> 1:22 24:22 25:23 <b>gestures</b> 7:7 <b>getting</b> 7:7 <b>give</b> 6:23 7:1 <b>given</b> 18:9 24:8 <b>go</b> 8:9 10:24 16:17 17:1	23:22 <b>go-around</b> 13:22 <b>going</b> 4:24 5:10 5:13,23 6:4,21 7:5,18,23 8:4 12:17 16:14 18:3 20:16 22:13,18,23 23:13,20 <b>good</b> 5:6 6:12 10:17 23:22 <b>government</b> 12:9,10 <b>graduate</b> 11:1 <b>great</b> 17:3 <b>ground</b> 5:23 <b>group</b> 15:17,18 <b>groups</b> 12:4 <b>guess</b> 13:10 21:11 <b>guideline</b> 24:18 <b>guys</b> 18:21 <hr/> <b>H</b> <hr/> <b>H</b> 3:17 <b>hand</b> 7:7 16:24 24:19 <b>happen</b> 15:1 <b>happened</b> 16:11 16:16,18 19:17 <b>HARLESS</b> 2:10 <b>head</b> 7:10 <b>heads</b> 7:6 <b>hear</b> 13:22 <b>heard</b> 13:8,11 13:14 <b>hearing</b> 23:20 <b>hearings</b> 14:4 <b>held</b> 14:4 <b>Heliodora</b> 1:17 3:11 4:4 5:16 25:2,20 <b>help</b> 6:25 <b>hereunto</b> 24:19 <b>high</b> 10:24,25
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<b>highlighting</b> 21:25 <b>Hispanic</b> 17:20 18:10,12 <b>Hobbs</b> 1:8 18:22 25:20 <b>Holtzman</b> 2:4 5:7 <b>honestly</b> 13:24 16:1,12,16 22:11 <b>hope</b> 4:12 <b>hoping</b> 8:4 <b>hot</b> 4:15 <b>HUGHES</b> 3:3 5:2 <b>husband</b> 13:2	<b>involvement</b> 11:18 <b>Irving</b> 9:24 10:2 <b>ISMAEL</b> 1:12 <b>issues</b> 4:19 <b>IV</b> 2:5	4:23 5:1 21:3 23:11 <b>left</b> 17:10 <b>LEGAL</b> 2:8,12 <b>legislative</b> 3:20 10:20,22 14:17 17:22 18:4,16 19:19,23,23 20:13 21:19,25 22:6,16 23:9 <b>level</b> 13:19 22:15 <b>License</b> 24:23 <b>LINE</b> 25:5 <b>listed</b> 25:4 <b>Litigation</b> 3:4 <b>little</b> 12:17 <b>live</b> 10:8,20 19:14 <b>lived</b> 9:12,14,15 <b>local</b> 12:10,11 <b>long</b> 8:5 9:13 11:15 16:12 <b>look</b> 17:14 <b>looking</b> 19:10 <b>looks</b> 4:18 <b>Los</b> 2:19 <b>lose</b> 4:13 <b>love</b> 7:2	<b>means</b> 18:10 <b>medication</b> 8:12 8:17 <b>meet</b> 6:12 <b>memory</b> 10:17 <b>Mexican</b> 12:23 12:24 <b>middle</b> 8:8 <b>midterm</b> 20:1 <b>midterms</b> 19:17 <b>minute</b> 16:20 21:8 <b>minutes</b> 17:7 <b>Morfin</b> 1:17 2:21,22,22 3:11 4:4 5:6,16 6:10,10,11 13:1 20:25 25:2,20 <b>morning</b> 5:6 <b>motions</b> 24:17 <b>moved</b> 9:16 <b>MULJI</b> 2:10 <b>municipality</b> 12:11,12 <b>mute</b> 6:3	20:15 21:21 <b>number</b> 3:18 15:4
<hr/> <b>I</b>	<hr/> <b>J</b>	<hr/> <b>K</b>	<hr/> <b>N</b>	<hr/> <b>O</b>
<b>I-R-V-I-N-G</b> 10:2 <b>identified</b> 20:25 <b>identify</b> 12:19 12:21 18:11 <b>impression</b> 15:13 <b>including</b> 24:16 <b>INDEX</b> 3:10 <b>indicated</b> 24:8 <b>individual</b> 17:12 17:14 19:11 <b>information</b> 12:18 13:8,11 14:1,7,8 <b>informed</b> 13:18 <b>instructs</b> 7:23 <b>interested</b> 24:13 <b>internet</b> 4:10 <b>Intervenor-De...</b> 1:14 2:3 5:8 <b>introduced</b> 3:18 12:25 <b>involved</b> 12:4 13:12 15:24 16:2,3,9	<b>keep</b> 4:16 5:10 <b>Kennewick</b> 2:23 <b>King</b> 24:3 <b>know</b> 4:8 5:24 6:3 7:6,17 8:4 9:3,12 12:21 13:17,19 14:20 14:22 15:1,3,5 16:11 17:17,23 18:17 <b>knowledge</b> 25:3	<hr/> <b>L</b>	<hr/> <b>M</b>	<b>oath</b> 4:5 7:11,13 <b>oaths</b> 24:5 <b>object</b> 7:24 23:11 <b>objection</b> 4:21 7:25 <b>objections</b> 7:1,3 7:4 24:9,17 <b>objects</b> 7:21 <b>office</b> 4:11 11:10 12:16 <b>official</b> 1:8 <b>Oh</b> 16:24 20:10 <b>okay</b> 4:8,22 5:3 5:17,23 6:3,6,7 6:17,21 7:13 7:16,21 8:3,12 8:18,22,25 9:3 9:8,11,18,23 10:4,9,13,23 11:1,11,23,25 12:3,6,15,17 13:6,14,20,25 14:3,6,10,14 14:23 15:1,9 15:13,21,24 16:4,7,13,19 16:23 17:1,9 17:17,24 18:2 18:7,18 19:4 19:10,15 20:1 20:10,16,23 21:1,6,14,18 21:24 22:9,13 22:14,23 23:4 23:17 <b>once</b> 16:2 <b>open</b> 4:17 6:13 <b>opinion</b> 18:3
<hr/> <b>L</b>	<hr/> <b>M</b>	<hr/> <b>N</b>	<hr/> <b>O</b>	<hr/> <b>P</b>
<b>Lake</b> 11:5 <b>LAKESIDE</b> 1:22 25:23 <b>Lane</b> 10:15 <b>Latino</b> 11:21 <b>Law</b> 2:21,22 6:11 <b>lawsuit</b> 13:12 15:22,25 16:8 16:14 18:22 <b>lay</b> 5:23 <b>learned</b> 16:2 <b>learning</b> 14:2 <b>leave</b> 22:18 <b>LEEPER</b> 2:9	<b>M</b> 1:22 5:4 24:22 25:23 <b>management</b> 11:10 <b>manner</b> 24:10 <b>map</b> 15:10,12,14 15:15,19,21 16:8,9,13 17:11,12,21 19:4,7 <b>maps</b> 13:22 14:18 16:23 17:13,15,17 <b>matter</b> 5:8	<b>name</b> 5:6,14 <b>named</b> 24:6 <b>names</b> 14:23 15:7 <b>nearby</b> 10:12 <b>need</b> 8:3,6 15:9 16:21 <b>nod</b> 7:6 <b>Nodded</b> 4:23 <b>nodding</b> 7:9 <b>nonpartisan</b> 15:4 <b>normal</b> 7:6 <b>Northwest</b> 2:12 <b>noted</b> 4:8 24:11 <b>November</b> 3:19		

<b>opportunity</b> 19:12 23:2,6 24:8 <b>opposed</b> 7:9 <b>ORAL</b> 1:16 <b>order</b> 16:11 <b>outages</b> 4:10 <b>outcome</b> 24:13 <hr/> <b>P</b> <hr/> <b>P</b> 2:1,1 <b>page</b> 2:25 3:11 25:5 <b>painless</b> 5:10 <b>Palmer</b> 1:5 2:8 25:20 <b>park</b> 4:11 <b>part</b> 13:3,4 <b>parties</b> 24:9,12 <b>party</b> 24:11 <b>Pasco</b> 9:15,15,20 9:21,24 10:3,5 10:6,8,13,16 10:25,25 13:9 13:12,15 <b>passed</b> 15:11 16:8 <b>pause</b> 6:24 <b>pending</b> 8:8 <b>people</b> 14:18 18:11 <b>percentage</b> 17:21 18:7,15 <b>Perfect</b> 5:3 <b>person</b> 19:3 <b>personal</b> 12:18 <b>Personally</b> 14:13 <b>PHILLIPS</b> 2:11 <b>Phoenix</b> 2:6 <b>phones</b> 6:17 <b>Plaintiffs</b> 1:6 2:8 2:16,21 <b>plaintiffs'</b> 13:1 <b>plan</b> 5:11	<b>please</b> 5:14 7:16 10:1 16:25 <b>PLLC</b> 2:22 <b>point</b> 9:1 11:17 16:9 <b>political</b> 11:18 11:19 12:3 <b>population</b> 17:21,25 18:4 18:9,10,11 <b>possible</b> 5:11 <b>prefer</b> 5:17 <b>preparation</b> 24:18 <b>prepare</b> 8:20 <b>prepared</b> 24:18 <b>preserves</b> 4:21 <b>prevents</b> 19:7 <b>previous</b> 4:20 13:8,10,14 <b>previously</b> 10:13 19:22 <b>problem</b> 4:12 <b>proceedings</b> 4:1 4:2 7:22 <b>process</b> 14:10,12 14:15 <b>professional</b> 12:6 <b>professionally</b> 11:9 <b>Project</b> 2:16,18 <b>proposed</b> 15:15 17:11,12,13,15 17:18 <b>provided</b> 14:8 <b>public</b> 2:18 14:4 <b>publicly</b> 14:6 <b>pursuant</b> 24:4 24:18 <b>put</b> 14:7 21:7,8 <hr/> <b>Q</b> <hr/> <b>qualifications</b> 24:10	<b>question</b> 7:25 8:7 18:6 <b>questions</b> 5:12 6:25 7:16 8:8 8:14,16 14:12 23:18 24:16 <b>quick</b> 20:24 <hr/> <b>R</b> <hr/> <b>R</b> 2:1 24:1 <b>R.W</b> 3:3 <b>race</b> 12:19 19:20 20:13 22:1,4 <b>races</b> 19:23 22:20 <b>RCW</b> 24:4 <b>RDR</b> 1:22 24:22 25:23 <b>read</b> 25:2 <b>real</b> 20:24 <b>really</b> 12:8 13:17,18 14:1 16:6 18:20 <b>reason</b> 8:15 25:5 <b>recall</b> 10:9,11,11 10:14 14:23 <b>reconvene</b> 17:6 <b>record</b> 4:3,10 5:14 7:8 17:9 23:22 24:9 <b>recording</b> 5:25 <b>redistricting</b> 12:7 13:7,13 13:16,21 14:10 14:15 <b>reduced</b> 24:7 <b>reestablish</b> 4:14 <b>Registered</b> 1:23 24:22 <b>relation</b> 13:4 <b>relative</b> 24:11 24:12 <b>released</b> 14:6 <b>remember</b> 13:24 16:1,4,6,12	17:16 22:11,22 23:1 <b>Remote</b> 1:16 4:1 <b>repeat</b> 20:6,8 <b>rephrase</b> 18:7 22:17 <b>Reported</b> 1:22 25:23 <b>reporter</b> 1:23 6:25 9:25 20:6 20:8,21 21:4,9 21:14 24:4,22 <b>REPORTING</b> 1:22 25:23 <b>represent</b> 5:8 19:11 <b>representative</b> 1:13 19:13,15 20:4,5,11,14 23:3 <b>represented</b> 19:2 <b>represents</b> 19:3 19:8 <b>Republican</b> 15:2 <b>request</b> 20:6 <b>reschedule</b> 4:17 <b>reserved</b> 23:25 <b>reside</b> 22:6 <b>Residing</b> 24:24 <b>resolve</b> 4:18 <b>resolved</b> 8:9 <b>response</b> 23:19 <b>responses</b> 7:5 <b>review</b> 8:22 14:6 15:10 16:23 24:8 <b>reviewed</b> 8:25 9:4,6 <b>right</b> 4:24 5:20 8:18 11:8,11 11:13 16:7,10 16:20 21:10,13 21:18,24,24 22:25 23:6	<b>Rights</b> 2:16,18 <b>Road</b> 2:5 <b>role</b> 12:15 <b>room</b> 6:8 <b>rules</b> 5:23 <b>rush</b> 16:19 <hr/> <b>S</b> <hr/> <b>S</b> 2:1 <b>saw</b> 15:13 16:9 16:24 <b>says</b> 21:18,25 <b>school</b> 10:24 <b>screen</b> 20:24 21:13 22:13 <b>screenshot</b> 3:19 20:19,21,22 21:5 <b>seat</b> 22:10 <b>Seattle</b> 3:5 9:16 10:5,10 11:6 24:24 25:21 <b>seconds</b> 6:24 <b>Secretary</b> 1:8 18:22 21:15 <b>see</b> 4:14 21:13 21:18,23 22:2 22:4,9 <b>seeing</b> 21:16 <b>seen</b> 15:21 16:13 <b>senate</b> 20:13 22:10 <b>senator</b> 19:19 21:25 22:12 <b>send</b> 4:16 20:19 21:12 <b>sense</b> 7:19 8:1 18:13 <b>service</b> 12:16 <b>set</b> 9:4,5 23:9 24:19 <b>shake</b> 7:6 <b>shaking</b> 7:9 <b>share</b> 20:24 <b>sharing</b> 22:13
--	--	---	---	---

<b>SHEET</b> 25:1 <b>short</b> 5:10 <b>sign</b> 24:8 <b>Signature</b> 23:25 25:18 <b>signing</b> 24:9 <b>silence</b> 4:25 <b>SIMONE</b> 2:9 <b>simple</b> 7:8 <b>SLeeper@Ca...</b> 2:13 <b>small</b> 16:25 <b>SONNI</b> 2:17 <b>Sonni@UCL...</b> 2:19 <b>sorry</b> 15:8 20:7 <b>Soto</b> 1:5 2:8 25:20 <b>South</b> 10:15 <b>specific</b> 13:15 <b>specifically</b> 7:22 12:7 <b>specifics</b> 5:13 <b>spoken</b> 9:8 <b>spot</b> 4:15 <b>SS</b> 24:2 <b>start</b> 5:11 <b>started</b> 5:24 15:22 16:8 <b>state</b> 1:8,9,13 3:2 5:14 12:9 13:16,22 14:15 18:21 19:19 20:13 21:25 22:10,12,15 24:2,5 <b>State's</b> 21:15 <b>STATES</b> 1:3 <b>stenographer</b> 5:25 <b>stenographica...</b> 24:6 <b>STEVEN</b> 1:8 <b>stop</b> 22:13 <b>street</b> 2:12 9:24	9:25 10:3 <b>streets</b> 10:12 <b>Strike</b> 22:16,18 <b>stuff</b> 8:5 <b>submit</b> 14:11 <b>sued</b> 18:21,21 <b>suggested</b> 15:17 15:18,20 <b>Suite</b> 2:5,12,23 3:5 <b>super</b> 8:5 <b>sure</b> 7:2,9 18:20 21:11 <b>SUSAN</b> 1:5 <b>switch</b> 12:17 <b>sworn</b> 24:14 <b>sworn/affirmed</b> 4:5 <hr/> <b>T</b> <b>T</b> 3:17 5:4 24:1 24:1 <b>tablets</b> 6:17 <b>take</b> 4:24 8:3 9:13 16:19,25 20:21 <b>taken</b> 20:22 24:6 24:17 <b>talk</b> 6:22 23:15 <b>talked</b> 12:24 <b>talking</b> 8:23 17:10 19:15 <b>Technical</b> 11:5 <b>tell</b> 4:5 17:20 18:19,25 20:3 <b>telling</b> 22:23 <b>tells</b> 18:8 <b>ten</b> 9:12,16 <b>term</b> 17:24 <b>testified</b> 4:6 <b>testify</b> 24:14 <b>testimony</b> 24:16 <b>thank</b> 5:3,9 8:18 10:18 17:5 21:6 23:21	<b>Thanks</b> 17:4 <b>thereof</b> 24:13 <b>thing</b> 8:5,6 <b>things</b> 6:17 <b>think</b> 9:13 12:5 12:24 16:17,20 18:25 19:1,4 23:22 <b>time</b> 4:18 5:9 7:1 8:3,23 9:13,13 11:17 13:24 16:10,12,21 23:21 24:10,17 <b>today</b> 4:12,22 5:9 7:3,11,21 8:12,16 9:9 23:14 <b>today's</b> 8:20 <b>totally</b> 8:6 <b>Tower</b> 2:5 <b>training</b> 11:4 12:6 <b>transcribed</b> 24:8 24:16 <b>transcript</b> 24:16 24:18 <b>TREVINO</b> 1:12 <b>Tri-Cities</b> 9:17 9:18 10:5,6 <b>true</b> 24:16 25:3 <b>truly</b> 16:12 <b>truth</b> 4:5,6,6 24:14,15,15 <b>truthfully</b> 8:14 8:16 <b>try</b> 5:10 7:17 16:22 18:7 <b>Tuesday</b> 1:19 <b>two</b> 11:16,17 18:18,23 20:3 22:5,6,9 <b>typewritten</b> 24:7 <hr/> <b>U</b> <b>UCLA</b> 2:16,18	<b>unclear</b> 7:16 <b>undersigned</b> 24:4 25:2 <b>understand</b> 7:11 7:14 8:5 10:4 14:15 16:7 <b>understanding</b> 18:6 <b>understood</b> 7:18 <b>UNITED</b> 1:3 <b>USDC</b> 25:21 <b>use</b> 6:5,14,18 <hr/> <b>V</b> <b>v</b> 1:7 25:20 <b>values</b> 19:3,8,10 <b>verbatim</b> 23:1 <b>versus</b> 15:2 <b>vicinities</b> 9:14 <b>vocational</b> 11:4 <b>Vogel</b> 2:4 5:7 <b>voice</b> 7:3 <b>volunteer</b> 11:19 <b>volunteered</b> 11:21 <b>vote</b> 14:19 18:11 19:16,19,20 20:1 22:11,15 22:18,20 <b>voted</b> 19:22 20:3 <b>voting</b> 2:16,18 3:19 17:20,24 18:4,8,10 <hr/> <b>W</b> <b>wait</b> 4:13 21:11 <b>waived</b> 24:9 <b>WAKNIN</b> 2:17 <b>walk</b> 9:11 <b>WALKER</b> 2:11 <b>want</b> 4:9 16:19 21:9 23:15 <b>wanted</b> 5:9 20:8 <b>Washington</b> 1:3 1:9,9 2:13,23	3:2,4,5 9:15,24 10:3,16,25 11:5 14:16 18:22 24:2,4,5 24:18,23,24 25:21 <b>wasn't</b> 20:9 <b>way</b> 23:9 <b>we'll</b> 6:23 7:2,3 17:6 21:11 <b>we're</b> 4:11 6:5 6:21 23:13,22 <b>we've</b> 4:20 <b>website</b> 20:17 21:16 <b>week</b> 9:7 <b>weeks</b> 9:6,7 19:17 <b>welcome</b> 10:19 <b>went</b> 10:25 11:6 <b>West</b> 2:23 9:24 <b>Western</b> 1:3 25:21 <b>WHEREOF</b> 24:19 <b>wish</b> 23:14 <b>witness</b> 10:2 17:3,5 24:6,7,9 24:14,19 25:20 <b>wondering</b> 18:24 <b>words</b> 18:25 <b>work</b> 4:15 8:10 12:17 14:15 17:2 <b>worked</b> 11:10 12:9,11 <b>working</b> 4:11 12:12 <b>wouldn't</b> 18:2 19:9 <hr/> <b>X</b> <b>X</b> 3:17 5:4
---	--	---	---	---



Heliodora Morfin

December 6, 2022

Page 31

<b>Y</b>	<b>365-3376</b> 1:23			
<b>YBARRA</b> 1:13	25:24			
<b>Yeah</b> 16:25 17:3	<b>4</b>			
<b>year</b> 11:1	<b>400</b> 2:12			
<b>years</b> 9:12,16,17	<b>5</b>			
11:16,17 13:9	<b>5</b> 3:12			
<b>Z</b>	<b>5.28.010</b> 24:4			
<b>Zoom</b> 6:3,15,21	<b>6</b>			
<b>0</b>	<b>6</b> 1:19 4:1 25:22			
<b>1</b>	<b>7</b>			
<b>1</b> 3:19 20:24,25	<b>7325</b> 2:23			
<b>1101</b> 2:12	<b>8</b>			
<b>1115</b> 9:24	<b>8</b> 3:19			
<b>11th</b> 24:20	<b>800</b> 3:5			
<b>14th</b> 2:12	<b>816</b> 10:15			
<b>15</b> 3:20 10:22,23	<b>833</b> 1:23 25:24			
18:5 19:20	<b>85016</b> 2:6			
20:13 21:19	<b>860</b> 2:5			
22:1,7,16	<b>8th</b> 21:21			
<b>15th</b> 17:22 18:16	<b>9</b>			
<b>1993</b> 11:2	<b>9:06</b> 1:19 4:2			
<b>2</b>	<b>9:25</b> 17:8			
<b>2</b> 24:23	<b>9:37</b> 17:8			
<b>20</b> 3:19	<b>9:49</b> 1:19 23:24			
<b>2000</b> 3:5	<b>90095</b> 2:19			
<b>20005</b> 2:13	<b>98104</b> 3:5			
<b>2009</b> 11:24	<b>99301</b> 9:24 10:3			
<b>2022</b> 1:19 3:19	10:16			
4:1 19:17 20:1	<b>99336</b> 2:23			
21:21 24:20				
25:22				
<b>2023</b> 24:23				
<b>2575</b> 2:5				
<b>2711</b> 1:22 24:23				
25:23				
<b>3</b>				
<b>3:22-cv-05035...</b>				
1:9 25:21				
<b>308-14-135</b>				
24:18				
<b>3250</b> 2:18				