

Soto Palmer, et al.

v.

Hobbs, et al.

\* \* \* \* \*

Remote FRCP 30(b)(6) Deposition Upon Oral  
Examination of Dave's Redistricting, LLC by  
David G. Bradlee  
October 18, 2022

\* \* \* \* \*

REPORTED BY:

LAKESIDE REPORTING

Jeanne M. Gersten, RDR, CCR 2711

(833) 365-3376

Jeanne@LakesideReporting.com

Contact@LakesideReporting.com

David G. Bradlee

October 18, 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, ) No. 3:22-cv-05035-RSL  
Defendants, )  
and )  
JOSE TREVINO, ISMAEL G. CAMPOS, )  
and State Representative )  
ALEX YBARRA, )  
Intervenor-Defendants. )  
REMOTE FRCP 30(b)(6) DEPOSITION UPON ORAL EXAMINATION OF  
DAVE'S REDISTRICTING, LLC by  
DAVID G. BRADLEE  
Tuesday, October 18, 2022  
10:07 a.m. to 2:57 p.m.  
REPORTED BY: LAKESIDE REPORTING  
Jeanne M. Gersten, RDR, CCR 2711  
Registered Diplomat Reporter  
(833) 365-3376  
Jeanne@LakesideReporting.com  
Contact@LakesideReporting.com

1 APPEARANCES:  
2 FOR THE WITNESS, DAVID G. BRADLEE:  
3 MASON KORTZ, Clinical Instructor  
4 HARVARD CYBERLAW CLINIC  
5 1557 Massachusetts Avenue  
6 Cambridge, Massachusetts 02138  
MKortz@Law.Harvard.edu  
7 FOR PLAINTIFFS SOTO PALMER, et al.,  
8 on behalf of CAMPAIGN LEGAL CENTER:  
9 ASEEM MULJI  
10 SIMONE LEEPER  
11 ANNABELLE HARLESS  
12 BEN PHILLIPS, Legal Fellow  
13 CAMPAIGN LEGAL CENTER  
14 1101 14th Street Northwest, Suite 400  
Washington, DC 20005  
SLeeper@CampaignLegalCenter.org  
AHarless@CampaignLegalCenter.org  
AMulji@CampaignLegalCenter.org  
BPhillips@CampaignLegalCenter.org  
15 FOR PLAINTIFFS on behalf of UCLA VOTING RIGHTS PROJECT:  
16 BERNADETTE REYES  
17 UCLA Voting Rights Project  
3250 Public Affairs Building  
Los Angeles, California 90095  
Bernadette@UCLAVRP.org  
18 FOR PLAINTIFFS on behalf of MALDEF:  
19 ERNEST HERRERA  
20 DEYLIN THRIFT-VIVEROS  
21 Mexican American Legal Defense and Educational  
Fund (MALDEF)  
22 634 South Spring Street, 11th Floor  
Los Angeles, California 90014  
23 EHerrera@MALDEF.org  
DThrift-Viveros@MALDEF.org  
24 (Continued on next page)  
25

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1 APPEARANCES, continued:  
2 FOR PLAINTIFFS on behalf of MORFIN LAW FIRM:  
3 EDUARDO MORFIN  
4 MORFIN LAW FIRM, PLLC  
5 7325 West Deschutes Avenue, Suite A  
6 Kennewick, Washington 99336  
Eddie@MorfinLawFirm.com  
7 FOR DEFENDANT STATE OF WASHINGTON:  
8 ANDREW R.W. HUGHES  
9 KARL D. SMITH  
10 Assistant Attorneys General  
ATTORNEY GENERAL OF WASHINGTON  
11 Complex Litigation Division  
800 Fifth Avenue, Suite 2000  
12 Seattle, Washington 98104  
Andrew.Hughes@ATG.Wa.gov  
Karl.Smith@ATG.Wa.gov  
13 FOR INTERVENOR-DEFENDANTS:  
14 DALLIN HOLT  
15 HOLTZMAN VOGEL  
16 2575 East Camelback Road, Suite 860  
Esplanade Tower IV  
17 Phoenix, Arizona 85016  
DHolt@HoltzmanVogel.com  
18 \*\*\*\*\*  
19  
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<p>1 October 18, 2022, Remote Proceedings: 2 PROCEEDINGS: 10:07 a.m. 3 (Discussion off the record.) 4 DAVID G. BRADLEE, 5 having been sworn/affirmed on oath to tell the truth, the 6 whole truth, and nothing but the truth, testified as 7 follows: 8 EXAMINATION 9 BY MR. MULJI: 10 Q Okay. We're on the record. 11 So for the record, good morning. My name is Aseem 12 Mulji. I represent the plaintiffs in the Soto Palmer v. 13 Hobbs lawsuit, and I'm going to be taking your deposition 14 today. 15 With me are a number of folks, a number of attorneys 16 from the plaintiffs' counsel team. I'll run through them 17 now. We have Simone Leeper from Campaign Legal Center, 18 Ben Phillips from Campaign Legal Center, Annabelle Harless 19 from Campaign Legal Center, Bernadette Reyes from the UCLA 20 Voting Rights Project, and Edwardo Morfin, also part of 21 the plaintiffs' counsel team. 22 And we have a number of attorneys from some of the 23 other parties as well. Dallin Holt representing the 24 Intervenor Defendants, and Andrew Hughes from the Attorney 25 General's Office representing the Washington State.</p>	<p>1 And I understand that you have your attorney present 2 as well, Mason Kortz. 3 So have you -- 4 MR. MULJI: Well, I think, Andrew, you were 5 going to mention this on the record. Yes? 6 MR. HUGHES: Yeah. On behalf of the State 7 I understand that Mason Kortz is not pro hac'd into the 8 state. We have no objection -- Sorry, pro hac'd into the 9 district. The State of Washington has no objection to 10 having him representing Mr. Bradlee in this deposition. 11 MR. HOLT: Additionally, -- 12 MR. MULJI: Likewise with plaintiffs. 13 MR. HOLT: Likewise from the intervenor 14 defendants. 15 And I just want to get on the record that we had 16 talked beforehand that for purposes of error preservation 17 an objection by one party to a question would preserve 18 error for all, so there's no need for everyone to object 19 to the same question. 20 Does everyone agree with that? 21 MR. MULJI: That's fine with us. 22 MR. HUGHES: On behalf of the State, yes. 23 MR. KORTZ: (Nodded.) 24 MR. MULJI: All right. 25 Q (By Mr. Mulji) And Dave, I see that you're off</p>
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<p>1 camera now. Oh, there you are. 2 A Sorry. I had to put the dog down. He's -- He might 3 whine for a little bit saying he needs some more treats or 4 something. 5 But I have painters in my house and everything; so 6 we're sort of up here in a separate room, but he's -- 7 Otherwise he'll be freaking out outside, so sorry. 8 Q No worries. Thank you for -- Thank you for being 9 with us today. I don't think this is going to be too long 10 of a deposition, but I'll start by -- 11 Well, actually, let me ask you can you state your 12 full name for the record? 13 A Yes. It's David Gordon Bradlee. 14 Q And I assume you go by Dave. 15 A That's correct. 16 Q And I can call you Dave during this deposition? 17 A Yes. 18 Q Do you understand that you've sworn under oath to 19 tell the truth as if you were in a court of law? 20 A Yes. 21 Q Have you ever been deposed before? 22 A No. 23 Q Okay. So I'm going to start by just talking about 24 some of the procedures for how this deposition is going to 25 work. So it's not like a normal conversation. I'm going</p>	<p>1 to be asking you questions that you're required to answer 2 fully and honestly under oath. 3 The first thing is in order to have a clear 4 transcript, like Jeanne mentioned, if you could please 5 wait for me to finish my question before responding so we 6 can make things easy for her and make for a clean record, 7 that would be great. 8 Does that make sense to you? 9 A Yes. 10 Q Okay. And the second thing is I'll need you to 11 respond audibly, as you have been doing, to all my 12 questions. A head nod or shake isn't going to show up on 13 the record, and um-hmm or uh-uh also won't be quite clear. 14 So yes, no, and, you know, what-have-you. 15 Does that make sense? 16 A Yes. 17 Q If there's anything that I ask that you don't 18 understand, since you're under oath please let me know and 19 I'll rephrase the question. Otherwise I'll assume that 20 you understand the question. 21 So will you let me know when you do not understand a 22 question that I ask? 23 A Yes. 24 Q Okay. And like I said, this shouldn't be all that 25 long of a deposition, but, you know, if at any time you</p>

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<p style="text-align: right;">Page 9</p> <p>1 want to take a break, just let me or your attorney know</p> <p>2 and we'll accommodate you. I'll just ask that if there's</p> <p>3 a question pending, I'll ask that you answer that question</p> <p>4 before we go on break.</p> <p>5 Does that make sense?</p> <p>6 A Yes.</p> <p>7 Q Okay. And is there any reason you can't testify</p> <p>8 truthfully, fully and accurately today?</p> <p>9 A No.</p> <p>10 Q Have you ever testified in court before?</p> <p>11 A No.</p> <p>12 Q Okay. Has Dave's Redistricting, LLC ever been a</p> <p>13 party to a lawsuit?</p> <p>14 A No. And let me just clarify. You know, we've</p> <p>15 received other subpoenas, but we have not been sued</p> <p>16 ourselves, if that's what you mean.</p> <p>17 Q Yes. And switching gears a little bit, do you have</p> <p>18 any plans to travel for the first two weeks of May, 2023?</p> <p>19 A Yes.</p> <p>20 Q Okay. What dates do you plan to be traveling during</p> <p>21 that time, if you know?</p> <p>22 A Well, we -- I mean, tentatively the entire month. I</p> <p>23 mean, that is the -- I mean -- Yes, tentatively the entire</p> <p>24 month. That's --</p> <p>25 You know, my wife, you know, has certain times that</p>	<p style="text-align: right;">Page 10</p> <p>1 she's available, and that's kind of the next kind of big</p> <p>2 time slot that we have; but, you know, --</p> <p>3 Q Okay.</p> <p>4 A And I can look at my calendar. I know that -- if</p> <p>5 you want something more specific there, --</p> <p>6 Q That's fine. That's fine for now.</p> <p>7 A -- at least the date.</p> <p>8 I don't know what the calendar looks like. I know</p> <p>9 that she's busy the first Friday of May, and then it's</p> <p>10 after that first Friday is when -- when she's available to</p> <p>11 travel for the next month, so --</p> <p>12 Q Okay. And you're here today pursuant to a subpoena;</p> <p>13 correct?</p> <p>14 A Yes.</p> <p>15 MR. MULJI: I'm going to mark as Exhibit 1,</p> <p>16 Jeanne, Document A titled DRA Deposition Subpoena.</p> <p>17 (Bradlee Exhibit No. 1 introduced.)</p> <p>18 Q Dave, I'm going to pull up on the screen the first</p> <p>19 exhibit to this deposition. Exhibits are just documents</p> <p>20 that I'm going to ask you questions about that are part of</p> <p>21 the official record of the deposition.</p> <p>22 Just give me a moment. I'm going to pull it up on</p> <p>23 the share screen, and then also for each of the exhibits</p> <p>24 going to share it in the chat. So you can open it up</p> <p>25 there, and we can also look at it together on my share</p>
<p style="text-align: right;">Page 11</p> <p>1 screen. I'm just going to get that set up.</p> <p>2 (Bradlee Exhibit No. 1 displayed.)</p> <p>3 Q All right. Can you see a document on your screen?</p> <p>4 A Yes.</p> <p>5 Q Okay. And you've received the document in the chat?</p> <p>6 A Yes.</p> <p>7 Q Okay. Great.</p> <p>8 Okay. Have you seen this document -- Well, let me</p> <p>9 scroll to the first page.</p> <p>10 Have you seen this document before?</p> <p>11 A Yes, I believe so. It looks familiar.</p> <p>12 Q Okay. And I'll scroll through so you can see. I'll</p> <p>13 just represent to you that this is the subpoena for the</p> <p>14 deposition that we sent to Dave's Redistricting, LLC.</p> <p>15 Have you taken a look at the deposition topics</p> <p>16 listed on page 4 of this document?</p> <p>17 A Yes, I have.</p> <p>18 Q And do you understand that today you'll be answering</p> <p>19 questions in your capacity as a designee of Dave's</p> <p>20 Redistricting, LLC?</p> <p>21 A So could you repeat that, just as a what?</p> <p>22 Q As a representative or designee of Dave's</p> <p>23 Redistricting, LLC.</p> <p>24 A Yes. Yes, I do.</p> <p>25 Q And do you understand that you're here as a designee</p>	<p style="text-align: right;">Page 12</p> <p>1 to answer questions related to topics one through five</p> <p>2 listed here on page 4 of Exhibit 1?</p> <p>3 A Yes.</p> <p>4 Q Did you review any documents in preparation for</p> <p>5 answering questions about these topics?</p> <p>6 A Yes. I mean, at least, yeah, a little bit of, you</p> <p>7 know, emails and information that I've put together</p> <p>8 relating to the response to the subpoena.</p> <p>9 Q Okay. So you reviewed the emails and documents</p> <p>10 related to the documents subpoena that we sent out?</p> <p>11 A Yes.</p> <p>12 Q Okay. Did you speak with any of your colleagues at</p> <p>13 Dave's Redistricting to prepare for this deposition?</p> <p>14 A Only some email exchanges just for clarifying</p> <p>15 questions, yeah.</p> <p>16 Q And for this next question I'm not asking you for</p> <p>17 the content of any communications with your attorney, but</p> <p>18 just asking did you speak with your attorney to prepare</p> <p>19 for this deposition?</p> <p>20 A Yes.</p> <p>21 Q Do you feel prepared to answer questions about these</p> <p>22 five topics?</p> <p>23 A Yes.</p> <p>24 Q So let's get into some of the substance then.</p> <p>25 First I'll have some questions just about some</p>

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<p style="text-align: right;">Page 13</p> <p>1 background on Dave's Redistricting.</p> <p>2 What does Dave's Redistricting, LLC do?</p> <p>3 A We -- So we -- and when I say we, it's, you know,</p> <p>4 myself and a small number of colleagues. We've created</p> <p>5 this application called Dave's Redistricting App, and so</p> <p>6 we, you know, created the application. We support the</p> <p>7 application, including answering questions of users and,</p> <p>8 you know, making new enhancements, et cetera.</p> <p>9 Q And that application is called Dave's Redistricting</p> <p>10 App; is that right?</p> <p>11 A That's correct.</p> <p>12 Q Okay. And is Dave's Redistricting App the only sort</p> <p>13 of project or product of Dave's Redistricting, LLC?</p> <p>14 A Yes, it is.</p> <p>15 Q Is it okay if I refer to Dave's Redistricting, LLC</p> <p>16 and the web app, Dave's Redistricting App, interchangeably</p> <p>17 during this deposition and call them both DRA?</p> <p>18 A Yes. Yes.</p> <p>19 Q Okay. So what is the application? What is DRA?</p> <p>20 A The application, it's a free web application so</p> <p>21 users -- You know, anyone can create an account with an</p> <p>22 email password, and they can -- They can create</p> <p>23 redistricting maps for any state, for congress, for</p> <p>24 legislature. They can do it for counties and cities as</p> <p>25 well.</p>	<p style="text-align: right;">Page 14</p> <p>1 They can create maps. They can export like a block</p> <p>2 assignment file for the maps they've created. They can</p> <p>3 import maps that others have created with other apps or</p> <p>4 the plans that states have, you know, released draft</p> <p>5 plans, et cetera. So there's that interoperability.</p> <p>6 And then they can evaluate the maps based on a large</p> <p>7 number of measures that the app provides.</p> <p>8 Q When was DRA created?</p> <p>9 A This version of the app, we began it in the</p> <p>10 beginning of 2018. It wasn't -- We didn't really tell</p> <p>11 anybody about it until right at the end of 2018, and then</p> <p>12 we've been working on it ever since.</p> <p>13 There was an earlier version that was created in</p> <p>14 2009.</p> <p>15 Q Okay. So there was a -- Was that the first version</p> <p>16 in 2009 of the app?</p> <p>17 A 2009 was the first version, yes.</p> <p>18 Q And the latest version that is the current version</p> <p>19 you said was released in about 2018?</p> <p>20 A Yeah. The end of 2018 is when we kind of emailed</p> <p>21 people who we knew had -- that we had been in contact with</p> <p>22 who had used the old app to let them know we had a new app</p> <p>23 up and running, and then we've just continued to work on</p> <p>24 it since then.</p> <p>25 Q And when you say we, who do you mean? Who created</p>
<p style="text-align: right;">Page 15</p> <p>1 DRA?</p> <p>2 A So the original version in 2009 was created by me</p> <p>3 alone, and this version was created by several colleagues.</p> <p>4 They're listed on the About page, but mainly Terry Crowley</p> <p>5 and Alec Ramsey. It's really the three of us have been</p> <p>6 kind of the key contributors.</p> <p>7 A few other people have written code, and then</p> <p>8 other people have helped us in others ways, including</p> <p>9 David Rinn, who you might see on a bunch of emails. He's</p> <p>10 really helped on the nontechnical aspects of communicating</p> <p>11 with customers, et cetera.</p> <p>12 Q And how do you know this group of folks?</p> <p>13 A We -- We all live in Seattle or used to live in</p> <p>14 Seattle. We all worked at Microsoft, although we don't --</p> <p>15 I don't think I knew any of them when I was there. But</p> <p>16 we're sort of connected with a group of other sort of tech</p> <p>17 people in the Seattle area that we've, you know, keep in</p> <p>18 touch with. And so that's how I met them was through that</p> <p>19 group of people.</p> <p>20 Q Does DRA have any paid staff?</p> <p>21 A Sorry. I couldn't hear that.</p> <p>22 Q I think you mentioned earlier that they were</p> <p>23 volunteers, or -- I'm wondering does DRA have a paid</p> <p>24 staff?</p> <p>25 A No. No paid staff.</p>	<p style="text-align: right;">Page 16</p> <p>1 Q Okay. And who -- Are you all members of the LLC?</p> <p>2 A No. I am -- I'm the only member of the LLC.</p> <p>3 Q Okay. And so what would you say is your role at</p> <p>4 DRA?</p> <p>5 A I -- You know, I'm a software engineer, so I work on</p> <p>6 the code is one role. I also, along with my colleagues,</p> <p>7 you know, answer questions. You know, we have sort of a</p> <p>8 feedback Alias, and so people use that to, you know, send</p> <p>9 us questions or, you know, to identify bugs.</p> <p>10 So I continue to work on the code and then</p> <p>11 communicate with customers, and -- Yeah. So that's my</p> <p>12 role.</p> <p>13 In terms of, you know, we don't really have like an</p> <p>14 organizational structure. So my colleagues and I, we're</p> <p>15 all -- We're a community of equals in that sense. There's</p> <p>16 no -- I'm not the boss or anything like that. We try to</p> <p>17 make the decisions about, you know, features and things.</p> <p>18 Really it's the three or four of us together.</p> <p>19 Q Do you work on DRA full-time?</p> <p>20 A I don't have another job. I'm retired from any</p> <p>21 paying job. So yeah, almost full-time. Certainly during</p> <p>22 the -- You know, kind of once I left my other job in 2019,</p> <p>23 so 2019, 2020, even 2021 it was mostly full-time that I</p> <p>24 was working on it, yeah.</p> <p>25 Q And can you just say a little bit about your</p>

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<p style="text-align: right;">Page 17</p> <p>1 professional history prior to working on DRA or prior to,</p> <p>2 I guess, going full-time on DRA?</p> <p>3 A Yes. So, you know, I worked at Microsoft for about</p> <p>4 20 years, ending in 2008. And then I worked at another</p> <p>5 company called LabKey Software from 2012 to 2019. I had</p> <p>6 worked at other companies back -- back east before moving</p> <p>7 out here.</p> <p>8 I have a Ph.D. from the University of Washington and</p> <p>9 an undergrad degree in math and computer science.</p> <p>10 Q So I want to ask you a little bit about the mission</p> <p>11 of DRA. Why was DRA created?</p> <p>12 A Yeah, we -- I mean, our mission is for fair and</p> <p>13 transparent redistricting, and that's what we say on our</p> <p>14 website.</p> <p>15 And really the reason it was created, even the</p> <p>16 original version back in 2009, is because especially back</p> <p>17 then there were no other tools available to regular</p> <p>18 people. You know, you could spend \$10,000 to buy the</p> <p>19 commercial software, but there wasn't really anything</p> <p>20 else. And so it was really to give regular people the</p> <p>21 ability to -- you know, to make maps and also kind of see</p> <p>22 what's going on, learn what's going on in the</p> <p>23 redistricting space.</p> <p>24 Q Where is DRA -- and I guess I'm referring to Dave's</p> <p>25 Redistricting, LLC -- incorporated?</p>	<p style="text-align: right;">Page 18</p> <p>1 A In Washington state.</p> <p>2 Q Did DRA have any involvement in drawing legislative</p> <p>3 or congressional districts in Washington state?</p> <p>4 A No direct involvement. In other words, we have not,</p> <p>5 you know -- Yeah, we have not been asked to nor have tried</p> <p>6 to help directly any of the redistricting in Washington</p> <p>7 state or in any other state.</p> <p>8 Q Has DRA been involved with the work of the 2021</p> <p>9 Washington State Redistricting Commission?</p> <p>10 A No. No.</p> <p>11 Q Does DRA take a position on what legislative or</p> <p>12 congressional districts should look like in any state or</p> <p>13 jurisdiction?</p> <p>14 A No.</p> <p>15 Q Does DRA engage in any partisan activity?</p> <p>16 A No.</p> <p>17 Q Does DRA engage in any political activity?</p> <p>18 A No.</p> <p>19 Q Is it fair to say DRA is sort of a neutral,</p> <p>20 nonpartisan tool available for anyone to use?</p> <p>21 A Yes, that's correct.</p> <p>22 Q You mentioned this before, and I just want to sort</p> <p>23 of nail down what sort of the core functionality is of</p> <p>24 DRA. You mentioned that users can create legislative and</p> <p>25 congressional district maps; that's right?</p>
<p style="text-align: right;">Page 19</p> <p>1 A Yes. Local as well.</p> <p>2 Q And they can --</p> <p>3 A Yeah.</p> <p>4 Q Local as well. Okay.</p> <p>5 And you mentioned they can sort of analyze those</p> <p>6 maps, see information about them?</p> <p>7 A Yes.</p> <p>8 Q And they can also share those maps?</p> <p>9 A Yes.</p> <p>10 Q Okay. I want to talk a little bit more about the</p> <p>11 process of creating maps. So to be clear, DRA enables the</p> <p>12 user to create state legislative districts for any state;</p> <p>13 right?</p> <p>14 A That's correct.</p> <p>15 Q And that includes Washington state?</p> <p>16 A Yes.</p> <p>17 Q What are the sort of main ways that a user can</p> <p>18 create a state legislative district plan in DRA?</p> <p>19 A So you can start from scratch, in which case you</p> <p>20 say -- you know, you say I'm going to create a new map. I</p> <p>21 want Washington state, for example. And I want, you know,</p> <p>22 state legislature.</p> <p>23 In many states, you know, there's State Senate and</p> <p>24 State House separately. So for all of those we -- You</p> <p>25 know, we know already how many districts, so we sort of</p>	<p style="text-align: right;">Page 20</p> <p>1 populate the number of districts automatically; but you</p> <p>2 can also change that, so --</p> <p>3 And then you start from scratch, and you</p> <p>4 basically -- You know, you're shown a map of the state</p> <p>5 that you've selected and with the precincts on the map,</p> <p>6 and you essentially paint the precincts. As you paint the</p> <p>7 precincts we tell you how much population you've put into</p> <p>8 each of those districts, and that's basically how you do</p> <p>9 it. You can go down to the block level as well, as</p> <p>10 needed.</p> <p>11 Q And you had mentioned earlier that you can also sort</p> <p>12 of import plans that people have created in other apps.</p> <p>13 A Um-hmm.</p> <p>14 Q Aside from creating a map from scratch, is that</p> <p>15 another way that you can --</p> <p>16 A Yes.</p> <p>17 Q -- create a map?</p> <p>18 A Yes. So you could import a map, import a block</p> <p>19 assignment file or a shapefile that comes from somewhere</p> <p>20 else, and then you can edit that map as you see fit.</p> <p>21 You could also -- You could -- So we -- There's a</p> <p>22 facility for publishing maps within DRA. So any user can</p> <p>23 publish the map, which means it is listed in a set of</p> <p>24 published maps that any user can see anywhere. And so you</p> <p>25 could make a copy of one of those and then start editing</p>

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<p style="text-align: right;">Page 21</p> <p>1 from there as well.</p> <p>2 Q Okay.</p> <p>3 A Yeah.</p> <p>4 Q So just to make sure I have sort of the ways that</p> <p>5 you can create a map in mind, you can create a map from</p> <p>6 scratch. You can modify sort of an existing district plan</p> <p>7 that you've imported.</p> <p>8 A Um-hmm.</p> <p>9 Q Or you can sort of modify a copy of a plan that's</p> <p>10 already in DRA; is that right?</p> <p>11 A Yes, that somebody has published and made visible to</p> <p>12 everybody.</p> <p>13 Q I see. And is there any other ways, sort of main</p> <p>14 categories of ways that you can create a state legislative</p> <p>15 district plan in DRA?</p> <p>16 A No.</p> <p>17 Q Does the user need to have set up a user account in</p> <p>18 order to create or modify a map?</p> <p>19 A Yes.</p> <p>20 Q Okay. And you had mentioned before that -- Well,</p> <p>21 what is -- How do you create a -- How do you create a user</p> <p>22 account?</p> <p>23 A You just -- There's a sign-up button, so you click</p> <p>24 that. It asks you for an email and a password, and then</p> <p>25 you're off.</p>	<p style="text-align: right;">Page 22</p> <p>1 I mean, you do have to accept the terms of service,</p> <p>2 although that was not the case kind of early -- a couple</p> <p>3 years back, so -- But yeah. Then that's all you need.</p> <p>4 You give it an email password.</p> <p>5 We also do not require email verification, unless --</p> <p>6 So we didn't used to require it for anything. We do</p> <p>7 require it now. I think it's fairly recent, let's say a</p> <p>8 number of months ago. If you want to publish a map, we do</p> <p>9 require you to verify your email address. If you want to</p> <p>10 send feedback through the feedback button, you have to</p> <p>11 verify your email address as well.</p> <p>12 Q What does it mean to verify email address?</p> <p>13 A Yeah, email verification, it's like most web apps</p> <p>14 and companies that you do business with on the web where</p> <p>15 they send you an email to that email address, and then you</p> <p>16 have to then click something in that email to tell the app</p> <p>17 that oh, this is a real email.</p> <p>18 I mean, the reason I'm making that point is that</p> <p>19 because we didn't require that, some email addresses might</p> <p>20 not really even be real email addresses. So that's</p> <p>21 certainly possible for a number of accounts. You know, we</p> <p>22 don't really know that except for whether it's -- until</p> <p>23 somebody verifies that, but we haven't required that.</p> <p>24 Even now we don't require it for just creating a map.</p> <p>25 Q Okay. So you don't need to -- I see. So in other</p>
<p style="text-align: right;">Page 23</p> <p>1 words, you just provide an email address to DRA, and you</p> <p>2 just accept that this is the email address that the person</p> <p>3 is providing you; and that's sort of their user name for</p> <p>4 the account?</p> <p>5 A That's correct, yeah. Just the -- Yeah, we take as</p> <p>6 a default user name the part of the email address before</p> <p>7 the domain name. You know, before the at sign. And then</p> <p>8 the user could change their user name if they feel like</p> <p>9 it.</p> <p>10 Q Okay. And are all the maps that a user draws or</p> <p>11 modifies in DRA stored in their user account?</p> <p>12 A Yes, they're all stored in a database. Yeah.</p> <p>13 Q Okay. And -- Well, let me --</p> <p>14 MR. MULJI: I want to mark as Exhibit 2</p> <p>15 Document B titled DRA My Maps page. I'll put that in the</p> <p>16 chat.</p> <p>17 A All right.</p> <p>18 (Bradlee Exhibit No. 2 introduced and displayed.)</p> <p>19 Q Okay. Do you see what I've marked as Exhibit 2 on</p> <p>20 the screen?</p> <p>21 A Yes.</p> <p>22 Q Do you recognize what is represented on this</p> <p>23 document?</p> <p>24 A Yes.</p> <p>25 Q What is it?</p>	<p style="text-align: right;">Page 24</p> <p>1 A Yeah. So this is, I guess, a screenshot of a logged</p> <p>2 in account, I think in DRA, and it's called the My Maps</p> <p>3 page.</p> <p>4 Q Okay. And is the My Maps page where a user can see</p> <p>5 all of the maps that they've created?</p> <p>6 A Yes.</p> <p>7 Q And this is an accurate representation, as far as</p> <p>8 you can tell, of My Maps page?</p> <p>9 A Yes.</p> <p>10 Q Does My Maps -- and I think I might have just said</p> <p>11 this, but My Maps displays all of the maps created by a</p> <p>12 user; correct?</p> <p>13 A Yes.</p> <p>14 Q Okay. And for each map -- Well, and I -- Okay.</p> <p>15 Actually, I'm going to -- I'm going to take us to sort of</p> <p>16 a live version of this page on my share screen here.</p> <p>17 Do you see that?</p> <p>18 A It looks the same to me, so --</p> <p>19 Q It will just be a little easier to talk about the</p> <p>20 page --</p> <p>21 A Right.</p> <p>22 Q -- when we have a live version up.</p> <p>23 So for each map My Maps displays the last time it</p> <p>24 was modified; correct?</p> <p>25 A Yes. Yes.</p>

6 (Pages 21 to 24)

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<p style="text-align: right;">Page 25</p> <p>1 Q It also displays the state in which it was drawn?</p> <p>2 A Yes. Yes.</p> <p>3 Q And it shows the sort of type of district plan?</p> <p>4 A Yes.</p> <p>5 Q And here it says 2020 Upper. What does that mean?</p> <p>6 A Yes. So when a map is created you can choose either</p> <p>7 the 2010 census voting district, so VTDs, Voting</p> <p>8 Tabulation Districts, that were produced by the census</p> <p>9 back in 2010, or the 2020 census VTDs. So that's what the</p> <p>10 2010 or 2020 means.</p> <p>11 And then upper would mean the upper House of the</p> <p>12 state legislature as opposed to the lower House. In</p> <p>13 Washington state, you know, there's only one, so we just</p> <p>14 consider that the upper.</p> <p>15 Q Got it. And then so it's just referring to -- The</p> <p>16 information that that's providing is just what sort of --</p> <p>17 what VTDs you're using and whether you're drawing like a</p> <p>18 legislative district plan or something else?</p> <p>19 A Right. So you can select we call it a plan type.</p> <p>20 So you can select congress, you know, upper State House,</p> <p>21 lower State House, or other, which includes cities and</p> <p>22 counties or just whatever somebody wants to do.</p> <p>23 Q And then there's also a column here on My Maps for</p> <p>24 labels?</p> <p>25 A Right.</p>	<p style="text-align: right;">Page 26</p> <p>1 Q Are those labels that the user has applied --</p> <p>2 A Yes.</p> <p>3 Q -- to maps?</p> <p>4 A Yes.</p> <p>5 Q Okay. And the user can also sort of select maps,</p> <p>6 like I've done here, --</p> <p>7 A Um-hmm.</p> <p>8 Q -- and take any number of actions on it; is that</p> <p>9 right?</p> <p>10 A Yes. Yes.</p> <p>11 Q I'll just note a couple. The user can sort of edit</p> <p>12 the map; is that right?</p> <p>13 A Yes.</p> <p>14 Q You can share the map?</p> <p>15 A Yes.</p> <p>16 Q And duplicate it?</p> <p>17 A Yes.</p> <p>18 Q You had mentioned you can publish a map. I think</p> <p>19 you told me what publish means, but is that just making</p> <p>20 it -- sort of posting it and making it accessible to</p> <p>21 everybody on the DRA website?</p> <p>22 A That's correct. It makes it publicly visible for</p> <p>23 anybody on the website.</p> <p>24 Q And even if a map is not published, can a user still</p> <p>25 share that map with others?</p>
<p style="text-align: right;">Page 27</p> <p>1 A Yes, they can.</p> <p>2 Q And then there's a -- It looks like you can also</p> <p>3 delete a map from your My Maps page.</p> <p>4 A Yes.</p> <p>5 Q What happens when a user deletes a map from My Maps?</p> <p>6 A When you delete a map it goes into a trash folder.</p> <p>7 The user can still see that trash folder if they want.</p> <p>8 And then periodically we, you know, the DRA team</p> <p>9 will purge the trash from the database. It doesn't really</p> <p>10 happen very often that we have done that. It's a -- It's</p> <p>11 not an automatic action, and so one of us has to kind of</p> <p>12 do that.</p> <p>13 Q And so if a user deletes a map, it still -- does it</p> <p>14 remain on DRA's server?</p> <p>15 A Yes, it remains in the database until a purge</p> <p>16 operation happens.</p> <p>17 Q When was the last time you purged a map?</p> <p>18 A I don't -- I don't know for sure the answer to that.</p> <p>19 My colleague was the one who does that. But I can tell</p> <p>20 you that we have not purged until -- since we received the</p> <p>21 first subpoena, which was for a different court case. I'm</p> <p>22 trying to think of when that was. I could -- I'm not sure</p> <p>23 when that was. I could figure it out by looking at my</p> <p>24 email, but it was some number of months ago.</p> <p>25 Q And prior to that -- Well, so prior to that do you</p>	<p style="text-align: right;">Page 28</p> <p>1 recall how often you purged deleted maps from your</p> <p>2 servers?</p> <p>3 A From what my colleague said is he would get around</p> <p>4 to it, you know, every few months.</p> <p>5 It's one of those things where there's no -- there's</p> <p>6 no down side really to not doing it. It just leaves stuff</p> <p>7 around. And we -- You know, we didn't have so many maps</p> <p>8 that it would become a performance issue to kind of leave</p> <p>9 them around, so that's why there was no particular rush to</p> <p>10 go and do that.</p> <p>11 Q When a person deletes a map from their My Maps page,</p> <p>12 does DRA keep a record of whether that -- If it remains on</p> <p>13 your server, do you keep a record of whether that map has</p> <p>14 been deleted?</p> <p>15 A Yes. There's just a -- It's just a Boolean field</p> <p>16 that says it's deleted.</p> <p>17 Q Okay. So if a person has deleted a map it remains</p> <p>18 on the server, and your server will -- If you go ahead and</p> <p>19 pull the map from the server it will tell you that that</p> <p>20 person has created a map, but they've deleted it; is that</p> <p>21 right?</p> <p>22 A That's correct.</p> <p>23 Q Okay. Is a user able to delete their user account?</p> <p>24 A They -- They can't do that by themselves. What they</p> <p>25 have to do, which some users have in cases, is they email</p>

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<p style="text-align: right;">Page 29</p> <p>1 us. They say, "I want to delete the account," and then we</p> <p>2 go ahead and delete it for them.</p> <p>3 Q And what happens to a user's maps when their account</p> <p>4 has been deleted?</p> <p>5 A I believe all those maps are gone. We delete the</p> <p>6 maps as well.</p> <p>7 Q Okay. So let's talk a little bit about the process</p> <p>8 of drawing a map in further detail.</p> <p>9 MR. MULJI: Let me pull up what I am going</p> <p>10 to mark as Exhibit 3, a document entitled DRA Map Drawing</p> <p>11 Page. It's Document C.</p> <p>12 (Bradlee Exhibit No. 3 introduced and displayed.)</p> <p>13 Q Do you see Exhibit 3 on your screen?</p> <p>14 A Yes.</p> <p>15 Q Okay. Do you recognize what's represented on this</p> <p>16 document?</p> <p>17 A Yes.</p> <p>18 Q What is it?</p> <p>19 A Yeah, so this is the, you know, the map page. So</p> <p>20 it's showing a specific map and some data about that map.</p> <p>21 Q Is this like a -- Is this an accurate representation</p> <p>22 of the map drawing page in DRA?</p> <p>23 A Yes.</p> <p>24 Q Okay. And I'm going to take us back to the live</p> <p>25 version just so we can talk about it a little more easily.</p>	<p style="text-align: right;">Page 30</p> <p>1 All right. So you mentioned that a user can create</p> <p>2 a district plan by starting a new map from scratch or</p> <p>3 modifying an existing map. I'll represent to you that I</p> <p>4 took a copy of the sort of enacted legislative plan</p> <p>5 published on DRA, made a copy of it, and that's what we're</p> <p>6 looking at.</p> <p>7 A Yes.</p> <p>8 Q Can you sort of -- You mentioned earlier that the</p> <p>9 way that you draw a map is by painting, painting precincts</p> <p>10 or blocks?</p> <p>11 A Um-hmm.</p> <p>12 Q Is it accurate to say that sort of in general a user</p> <p>13 sort of builds a district plan by assigning precincts or</p> <p>14 blocks to each district in a plan; is that right?</p> <p>15 A Yes.</p> <p>16 Q Okay. And you sort of -- the way you do it is by</p> <p>17 sort of selecting the district you want to paint, and then</p> <p>18 using this sort of paintbrush tool to sort of select which</p> <p>19 precincts or blocks you want to put in that district; is</p> <p>20 that right?</p> <p>21 A Yes.</p> <p>22 Q Okay. I want to note -- So what is this? There's</p> <p>23 some lock and unlock buttons next to each district --</p> <p>24 A Um-hmm.</p> <p>25 Q -- on this page. What do those mean?</p>
<p style="text-align: right;">Page 31</p> <p>1 A So if you lock a district, it means we're not going</p> <p>2 to -- We will prevent you from changing that, you know,</p> <p>3 while you're painting other districts so you don't</p> <p>4 accidentally, you know, paint over something in that</p> <p>5 district that you didn't want to.</p> <p>6 Q Okay. So, for example, if I -- You know, if I'm</p> <p>7 drawing this map right now and I lock District 10, it just</p> <p>8 means that I'm not making any more -- I can't and I won't</p> <p>9 be making any more changes to that until I unlock it?</p> <p>10 A That's correct. You can't. You can't either -- You</p> <p>11 can't add to it, and you can't take away from it --</p> <p>12 Q Okay.</p> <p>13 A -- when it's locked.</p> <p>14 Q You mentioned that VTDs, voting --</p> <p>15 What does that stand for?</p> <p>16 A Yeah, so we -- You know, we call them precincts</p> <p>17 here; but when the census, you know, releases their data,</p> <p>18 they call them Voting Tabulation Districts because, you</p> <p>19 know, different states -- not all states call them</p> <p>20 precincts, so they use that more generic term.</p> <p>21 And that's what -- That's what we provide. You</p> <p>22 know, with the 2020 shapes it's the 2020 Voting Tabulation</p> <p>23 District shapes, which we call precincts, that were</p> <p>24 provided with the census shapes and data.</p> <p>25 Q And those VTDs or precinct boundaries are</p>	<p style="text-align: right;">Page 32</p> <p>1 represented here on Exhibit 3 with these sort of maroon</p> <p>2 lines; right?</p> <p>3 A Yes, that's correct.</p> <p>4 Q Okay. And precincts or VTDs are sort of the main</p> <p>5 building block or geographic unit for sort of building</p> <p>6 district maps in Washington state.</p> <p>7 A Yes.</p> <p>8 Q Is that right?</p> <p>9 A Yeah. They're the main -- the main building block,</p> <p>10 yeah.</p> <p>11 Q Okay. And you said that you can also sort of paint</p> <p>12 using census blocks.</p> <p>13 A Yes.</p> <p>14 Q What are census blocks?</p> <p>15 A Well, census blocks are a -- you know, are shapes or</p> <p>16 areas that the census has designated. They're the lowest</p> <p>17 level -- in other words, the smallest area of -- that the</p> <p>18 census provides, and the census provides data.</p> <p>19 So all the, you know, census data is provided at the</p> <p>20 block level when the census does its release.</p> <p>21 Q Okay. And so in addition to sort of like assigning</p> <p>22 a particular precinct or VTD to a district, you can also</p> <p>23 sort of split the precinct into census blocks and assign</p> <p>24 those individual census blocks individually; right?</p> <p>25 A Yes, that's correct.</p>

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<p style="text-align: right;">Page 33</p> <p>1 Q I think the way that you describe it on your website</p> <p>2 is that you're sort of shattering a precinct into its</p> <p>3 constituent blocks and working with those individually; is</p> <p>4 that accurate?</p> <p>5 A Yes, that is.</p> <p>6 Q Okay. And you had mentioned that when you start a</p> <p>7 map from scratch it gives you the option to use either</p> <p>8 2020 or 2010 precincts; is that right?</p> <p>9 A Yes.</p> <p>10 Q And 2020 at this point is sort of -- is that</p> <p>11 preselected as the default?</p> <p>12 A Yes, it is.</p> <p>13 Q Okay. Where did DRA get the 2020 precinct</p> <p>14 boundaries and block shape boundaries from?</p> <p>15 A From the census, you know, the U.S. Census website.</p> <p>16 Q And when did the 2020 precinct and block shape</p> <p>17 boundaries become available on DRA?</p> <p>18 A They were -- It was in 2021. Let's say the spring</p> <p>19 of 2021, roughly.</p> <p>20 I know this year was a little different because of</p> <p>21 the pandemic, and so the data -- you know, the census data</p> <p>22 was delayed, but they did release the shapes in that</p> <p>23 springtime time period, you know, March, April, May of</p> <p>24 2021.</p> <p>25 Q Okay. And I just wanted to -- I want to nail down,</p>	<p style="text-align: right;">Page 34</p> <p>1 you know, the timing of this.</p> <p>2 MR. MULJI: I'm going to mark as Exhibit 4</p> <p>3 Document D. I'll throw this in here.</p> <p>4 (Bradlee Exhibit No. 4 introduced and displayed.)</p> <p>5 Q Do you see Document D on your screen?</p> <p>6 A Yes.</p> <p>7 Q Or I should say Exhibit 4.</p> <p>8 A There it is. March 10th. That was the date.</p> <p>9 Sorry.</p> <p>10 Q Sorry. I'm just trying to put this exhibit in the</p> <p>11 chat. I'm having a little trouble with that.</p> <p>12 A Right.</p> <p>13 MR. MULJI: Counsel, I'm having some</p> <p>14 trouble putting this exhibit in the chat box for some</p> <p>15 reason, just this one. Is it okay if I email this one to</p> <p>16 you all separately?</p> <p>17 Okay. Is it all right if I do that during a break?</p> <p>18 MR. KORTZ: (Nodded.)</p> <p>19 Q (By Mr. Mulji) All right. Great. So looking at</p> <p>20 this document, this appears to be a blog post; correct,</p> <p>21 posted by DRA?</p> <p>22 A Yes.</p> <p>23 Q About the release of the 2020 census shapes and</p> <p>24 block -- block shapes?</p> <p>25 A Yes.</p>
<p style="text-align: right;">Page 35</p> <p>1 Q Okay. And you just told me that it was March 10th</p> <p>2 that this became -- that these became available on the DRA</p> <p>3 website?</p> <p>4 A Yes. Yes.</p> <p>5 Q Okay. So next I want to talk a little bit about</p> <p>6 sharing maps on DRA, and so DRA enables a user to share</p> <p>7 maps; right?</p> <p>8 A Yes.</p> <p>9 Q Okay. And a user can share a map by sending the</p> <p>10 person who they want to share the map with a link to this</p> <p>11 map; is that right?</p> <p>12 A That's correct.</p> <p>13 Q Okay. And you can -- You can get a share link by</p> <p>14 clicking this share button in the DRA map environment;</p> <p>15 correct?</p> <p>16 A Yes.</p> <p>17 Q And that opens like a dialogue box that provides the</p> <p>18 user a link, a share link to that map?</p> <p>19 A Yes.</p> <p>20 Q Okay. And this share link, it's associated just</p> <p>21 with one map; correct?</p> <p>22 A Correct.</p> <p>23 Q Okay. So if you click a share link it's not going</p> <p>24 to -- It will only take you to one map. It's only</p> <p>25 associated with one map?</p>	<p style="text-align: right;">Page 36</p> <p>1 A That's correct.</p> <p>2 Q Okay. And that's because the link includes like</p> <p>3 this alphanumeric key unique to this map; correct?</p> <p>4 A Yes.</p> <p>5 Q Okay. So in addition to sort of opening this</p> <p>6 dialogue box and sharing within the DRA map environment, I</p> <p>7 can also or a user can also sort of just copy and paste</p> <p>8 the link in the browser; is that correct?</p> <p>9 A Yes.</p> <p>10 Q Okay.</p> <p>11 A Although that was not always the case.</p> <p>12 Q When did that -- When did it become the case that</p> <p>13 you could copy and paste the link in the browser and share</p> <p>14 that link?</p> <p>15 A I'm not -- I'm not quite sure. It was probably late</p> <p>16 last year. I mean, late -- let's say the fall of last</p> <p>17 year.</p> <p>18 We had some bugs around -- around some of that, and</p> <p>19 so -- Yeah, I can't recall the exact timeframe; but I know</p> <p>20 we had some bugs around some of those IDs, and so we made</p> <p>21 it a lot simpler.</p> <p>22 So yes, you can just share it. In other words, that</p> <p>23 ID that you see is the same as the ID you're going to</p> <p>24 get -- I believe -- if you share that with view-only</p> <p>25 privileges.</p>

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<p style="text-align: right;">Page 37</p> <p>1 Q Okay. So basic -- So the reason that you can share</p> <p>2 this browser link with someone is because it has the same</p> <p>3 sort of unique identifier for this map --</p> <p>4 A Yes.</p> <p>5 Q -- that you would get if you shared through the sort</p> <p>6 of DRA website, even though this link looks a little</p> <p>7 different.</p> <p>8 A Yes, that's correct.</p> <p>9 Q Is that right?</p> <p>10 A Yes.</p> <p>11 Q Okay. And if you receive -- If you receive a DRA</p> <p>12 share link, do you need a user account to open the link</p> <p>13 and view the map?</p> <p>14 A No.</p> <p>15 Q And if you receive a DRA share link, do you need to</p> <p>16 be -- do you need to be logged into your user account to</p> <p>17 open a link, like open the link and view the map?</p> <p>18 A No.</p> <p>19 Q Okay. If a user has an account, are all the maps</p> <p>20 that have been shared with them stored somewhere in their</p> <p>21 account on DRA?</p> <p>22 A Yes, although let me clarify that. Even if the user</p> <p>23 has an account, if they're not logged in and they view a</p> <p>24 map, you know, you view a link that somebody sends to</p> <p>25 them, you know, they're not logged in, so we don't -- you</p>	<p style="text-align: right;">Page 38</p> <p>1 know, we don't know it's them.</p> <p>2 So until they log in and view it when they're logged</p> <p>3 in, then it's associated with their account.</p> <p>4 Q I see. So a person, if someone receives a DRA link</p> <p>5 and they're not logged in, they might have seen it, but</p> <p>6 DRA doesn't quite know it unless they were logged into</p> <p>7 their user account?</p> <p>8 A That's correct.</p> <p>9 Q Okay. So let me move to another exhibit here.</p> <p>10 MR. MULJI: I'll mark as Exhibit 5</p> <p>11 Document G.</p> <p>12 (Bradlee Exhibit No. 5 introduced and displayed.)</p> <p>13 Q Do you see Document G on your screen? I'm sorry.</p> <p>14 Exhibit 5.</p> <p>15 A Yes.</p> <p>16 Q This one I was able to share in the chat.</p> <p>17 Okay. And what's represented here on Exhibit 5?</p> <p>18 A Excuse me. Yeah, so this is the Shared With Me</p> <p>19 view. Do you want me to clarify what that means?</p> <p>20 Q That would be great.</p> <p>21 A Yeah. So basically this shows a list of all the</p> <p>22 maps that have been shared with you. So that means, you</p> <p>23 know, you -- well, you, the account holder here, when</p> <p>24 logged in you -- you know, you actually viewed a map that</p> <p>25 somebody sent you a link for, or you viewed a published</p>
<p style="text-align: right;">Page 39</p> <p>1 map. I think -- I think that's true. I might be a little</p> <p>2 wrong.</p> <p>3 In other words, you know, there are published maps</p> <p>4 on here that are essentially shared with everybody; and if</p> <p>5 you look at one of those, I believe we do put it in this</p> <p>6 list as well.</p> <p>7 Q So is it right to say that this list contains all of</p> <p>8 the maps that you have clicked the link for and looked at</p> <p>9 while you're logged into your account?</p> <p>10 A Well, so yes, but with the exception of you can</p> <p>11 remove things from your Shared With Me list, and we will</p> <p>12 remove them. We will forget that you ever saw them in the</p> <p>13 past.</p> <p>14 Q Okay. And I'm just going to go to the -- I'm just</p> <p>15 going to go to the live version of this, and so we can</p> <p>16 take a look at that.</p> <p>17 So like the My Maps page, the user can take certain</p> <p>18 actions on the maps that they've viewed that are archived</p> <p>19 here on the Shared With Me page; correct?</p> <p>20 A Yes.</p> <p>21 Q They can view the map?</p> <p>22 A Um-hmm; yes.</p> <p>23 Q They can share a map that they've viewed?</p> <p>24 A Yes.</p> <p>25 Q They can duplicate a map that's been shared here</p>	<p style="text-align: right;">Page 40</p> <p>1 with them; correct?</p> <p>2 A Yes.</p> <p>3 Q Okay. When that happens does that mean does that</p> <p>4 map then appear in their My Maps page because they've</p> <p>5 created it?</p> <p>6 A Yes.</p> <p>7 Q Okay. And that allows --</p> <p>8 A With the title will be copy of whatever the name is.</p> <p>9 Q Okay. Right. So if I, you know, duplicate</p> <p>10 Washington 2022 State Legislatures, it should show up here</p> <p>11 as copy of --</p> <p>12 A Right.</p> <p>13 Q Copy of, I guess.</p> <p>14 A Yeah.</p> <p>15 Q Okay.</p> <p>16 A And it will take a -- There it is, yes.</p> <p>17 Q And it takes --</p> <p>18 A A few seconds.</p> <p>19 Q Oh, I guess I've already done this before on this</p> <p>20 account, but -- And this allows the user then to sort of</p> <p>21 edit a map that has been shared with them, a copy --</p> <p>22 A Yes.</p> <p>23 Q -- of the map?</p> <p>24 A Yes, exactly. Yes.</p> <p>25 Q Okay. And you mentioned that -- I'll go back to the</p>

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<p style="text-align: right;">Page 41</p> <p>1 Shared With Me. All right. You mentioned that a user can  2 remove a map from the list?  3 A Yes.  4 Q And when a user does this does DRA keep a record of  5 the maps that a user has deleted from their Shared With Me  6 record page?  7 A No. I am pretty sure that we do not keep a record  8 of that.  9 Q Okay.  10 A Although, you know, it may take a little bit of time  11 before that information -- You know, I mean a little bit  12 of time, meaning some minutes before that information is  13 updated in the server.  14 Q Okay. So we talked about sharing maps with -- Oh,  15 well, actually, so I wanted to ask when we were talking  16 about sharing maps, there is an option for revoking  17 sharing to a map.  18 A Yes.  19 Q Let me go back to that so we can take a look at it  20 together. So I just opened a map in this account, and  21 let's say I want to share it. There's a button for revoke  22 sharing.  23 A Yes.  24 Q What does that do?  25 A Yeah, so essentially it makes -- So when you share a</p>	<p style="text-align: right;">Page 42</p> <p>1 map, you know, we have that ID. We have a view-only ID  2 and then an editable ID, an ID that would allow the holder  3 of that ID to edit the map.  4 So when you revoke sharing we make those IDs  5 obsolete, and we make new IDs for the map for those two  6 purposes.  7 Q So when the user revokes sharing of a map that  8 they've shared, basically the links to those maps will no  9 longer work if you --  10 A That's correct.  11 Q -- click on them; right?  12 A That's correct.  13 Q And if a user, you know, has viewed one of those  14 maps before, does that map -- If a user revokes sharing on  15 a map that's been shared with somebody and they've looked  16 at it and it shows up in their Shared With Me, if the user  17 who shared the map then revokes sharing does the map still  18 appear in Shared With Me, or does it disappear?  19 A I believe it still appears in the Shared With Me.  20 Q Okay.  21 A You know, yeah, it's essentially stale; so when the  22 user would click on that it would say hey, I can't find  23 that map.  24 Q Okay. We've talked thus far about link sharing. Is  25 it also possible to export a map that you're viewing in</p>
<p style="text-align: right;">Page 43</p> <p>1 DRA and share it that way?  2 A Yes. Yes.  3 Q Okay. And so you had mentioned earlier that you can  4 sort of -- you can export a map into different file  5 formats.  6 What file formats can you export a map in DRA into?  7 A Yeah, so you can export a block assignment file, so  8 that basically -- That is sort of a standard in the  9 industry in a way. So that is, you know, for every census  10 block here's what district it's in. That's it.  11 You can also export a shapefile. So a shapefile is  12 a visual -- a set of shapes that, you know, on a map. So  13 in other words, it's, you know, geo -- geographic  14 coordinates of those shapes.  15 The shape file is something that was created by  16 ESRI, a company ESRI, sometime back, and it's a standard  17 around the industry as well.  18 And you can also export -- You can export as what we  19 call a map archive, so that is a JSON file. JSON is  20 JavaScript Object Notation. So it's a text file with a  21 certain representation; and that's an archive that can be  22 reloaded into DRA, but it's not something that can be  23 loaded in any other app.  24 And then you can export stuff like a CSV for data  25 and et cetera.</p>	<p style="text-align: right;">Page 44</p> <p>1 Q Okay. And did you mention GeoJSON files?  2 A Yeah, I didn't mention that; but yes, you can export  3 I believe it's GeoJSON as well, which is sort of like a  4 shapefile. I don't know. I think you can do both, but I  5 might be wrong. I forget what we changed in that, in that  6 respect.  7 Q I just navigated to the options for exporting a map.  8 A Right. So -- Yeah, we do have both, yes. So the  9 GeoJSON and the shapefile, those are equivalent geographic  10 representations but just, yeah, different -- different  11 formats, yeah.  12 Q And it looks like you can also -- I don't think you  13 mentioned this for this particular export format, but you  14 mentioned block assignment files. It looks like you can  15 also export as a precinct assignment file.  16 A Yes.  17 Q Is that right?  18 A Yes. So that is -- Yeah. So it lists all the  19 precincts, and so it's the GeoID. So that's the, you  20 know, the census has an ID for every block. It has an ID  21 for every precinct. So there's a GeoID for that precinct,  22 and we say which district you put that precinct in.  23 I should mention that in the precinct assignment  24 files if the user has split precincts then, you know, we  25 kind of create a special ID for each of those pieces, and</p>

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<p style="text-align: right;">Page 45</p> <p>1 that's represented in that file as well.</p> <p>2 Q Okay. And I think I heard everything you said. My</p> <p>3 internet here is a little -- maybe a little lagging; and</p> <p>4 if it continues to be I will do something about it, but it</p> <p>5 seems okay now.</p> <p>6 A Yeah, hopefully mine is okay, too. I know it's --</p> <p>7 Yeah. Yeah, if it has a problem, just -- with me if I'm</p> <p>8 freezing or something, just let me know. I might be able</p> <p>9 to switch to the different WiFi we have or something.</p> <p>10 Okay?</p> <p>11 Q Okay. I think it's been okay so far. It's just the</p> <p>12 internet is a little bit --</p> <p>13 Okay. So just to confirm, block assignment files</p> <p>14 and precinct assignment files are essentially files that</p> <p>15 say here are all the blocks, and here are the districts</p> <p>16 that they're assigned to; is that right?</p> <p>17 A That's correct, yes.</p> <p>18 Q Okay.</p> <p>19 A It's basically a two-column, you know, Comma-</p> <p>20 Separated Value file.</p> <p>21 Q Okay. And I guess my original point in asking about</p> <p>22 this was that in addition to sort of sharing a link to a</p> <p>23 map, the user can just sort of export the map to one of</p> <p>24 these formats --</p> <p>25 A That's correct.</p>	<p style="text-align: right;">Page 46</p> <p>1 Q -- and send it to the person that they want to send</p> <p>2 it to.</p> <p>3 Okay. If a person deletes their account, are the</p> <p>4 maps that they've shared with people still visible in DRA?</p> <p>5 A No. The maps that they've shared via a link would</p> <p>6 not be visible. They would be gone.</p> <p>7 Q So if you click the link it will just say, you know,</p> <p>8 this map doesn't exist, or something like that?</p> <p>9 A Yes, that's correct.</p> <p>10 Q Okay. So I want to talk a little bit about the --</p> <p>11 Well, actually we're at the hour mark. I just wanted to</p> <p>12 check in. Would it be helpful to take like a five-minute</p> <p>13 break?</p> <p>14 A I mean, I'm fine. I can go for a while longer.</p> <p>15 (Zoom technical difficulties, court reporter lost Zoom</p> <p>16 connection.)</p> <p>17 (Break 11:08 a.m. to 11:14 a.m.)</p> <p>18 (Last question and answer read back.)</p> <p>19 (Discussion off the record.)</p> <p>20 MR. MULJI: So let's get back on the</p> <p>21 record.</p> <p>22 Q (By Mr. Mulji) Dave, I'm going to share my screen</p> <p>23 again so that we can talk about what data is available to</p> <p>24 users while they're creating or viewing map. And let me</p> <p>25 make sure I do that correctly.</p>
<p style="text-align: right;">Page 47</p> <p>1 (Document displayed.)</p> <p>2 Q Okay. Do you see a map, the map editing page on</p> <p>3 your screen?</p> <p>4 A Yes.</p> <p>5 Q Okay. I'll just get my computer set up again and my</p> <p>6 screen set up.</p> <p>7 Okay. So DRA provides users access to various data</p> <p>8 and analytics while they're drawing legislative district</p> <p>9 plans; correct?</p> <p>10 A Yes.</p> <p>11 Q And a user can choose which data and metrics they</p> <p>12 want to look at and which ones they want to hide or not</p> <p>13 look at; correct?</p> <p>14 A Well, yes, they choose which data to show on this</p> <p>15 page. In terms of hiding metrics you can say I don't want</p> <p>16 to see any election data, and it will hide everything</p> <p>17 relating to partisanship, but that's really the only</p> <p>18 switch. You can't really fine -- do more fine-grained</p> <p>19 selection of metrics.</p> <p>20 Q I guess but you can turn certain data on and off</p> <p>21 from view; right?</p> <p>22 A You can turn -- Yeah, from this view you can turn</p> <p>23 different data on and off. And also it's different data</p> <p>24 that's used for the analytics or the statistics. You can</p> <p>25 kind of change that as well.</p>	<p style="text-align: right;">Page 48</p> <p>1 Q Okay. And you said that the user can sort of -- can</p> <p>2 say they don't want to see any partisan election data.</p> <p>3 There's a setting in DRA where they can sort of check a</p> <p>4 box, and it just won't show them anything at all related</p> <p>5 to partisan election data; is that right?</p> <p>6 A That's correct.</p> <p>7 Q And then other data, that's sort of you have to</p> <p>8 select it individually whether you want to turn it on or</p> <p>9 off?</p> <p>10 A Yes, that's correct.</p> <p>11 Q Okay. So let's go through some of that data,</p> <p>12 starting with the data available on the sort of main map</p> <p>13 drawing page.</p> <p>14 Like I said, I've pulled up sort of the same example</p> <p>15 map that we were looking at before. Do you see that?</p> <p>16 A Yes.</p> <p>17 Q And the top left panel here is called District</p> <p>18 Selector; right?</p> <p>19 A Yes. Yes.</p> <p>20 Q As far as I can see, this panel shows the total</p> <p>21 population of each district; correct?</p> <p>22 A Correct.</p> <p>23 Q Does this panel show the total population based on</p> <p>24 2020 census data?</p> <p>25 A Well, it's whatever total population data that you</p>

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<p style="text-align: right;">Page 49</p> <p>1 selected. In this case I believe, given what I see on the</p> <p>2 screen, it would be the adjusted total population census</p> <p>3 data, and that's adjusted for the -- for prisoners who</p> <p>4 are -- You know, it's adjusted so their allocations are in</p> <p>5 different locations than the prisons, as Washington has</p> <p>6 that state law.</p> <p>7 Q I see. So the user can choose what population count</p> <p>8 data they want to use in the District Selector panel.</p> <p>9 They can choose which one shows up?</p> <p>10 A Yeah, and that choice is going to affect all the</p> <p>11 panels.</p> <p>12 Q I see. So we'll talk about what those choices are</p> <p>13 in just a minute, --</p> <p>14 A Yeah.</p> <p>15 Q -- but for now suffice to say that what this panel</p> <p>16 is showing you is just, you know, how many -- how many</p> <p>17 individuals are in each district as you're drawing;</p> <p>18 correct?</p> <p>19 A That's correct.</p> <p>20 Q Okay. And it also shows how much each district's</p> <p>21 population is above or below the target population for the</p> <p>22 district; correct?</p> <p>23 A That's correct.</p> <p>24 Q And the target population is just what the</p> <p>25 population of the district should be if you're aiming for</p>	<p style="text-align: right;">Page 50</p> <p>1 precise mathematical equality between all of the</p> <p>2 districts?</p> <p>3 A That's correct.</p> <p>4 Q Okay.</p> <p>5 A Yeah, it's total state population, you know,</p> <p>6 according to that total population selected, divided by</p> <p>7 the number of districts.</p> <p>8 Q Okay. So next let's -- I'm just going panel by</p> <p>9 panel here. So let's talk about what appears in the</p> <p>10 district details panel on the left side --</p> <p>11 A Yes.</p> <p>12 Q -- and the details panel on the right side --</p> <p>13 A Yes.</p> <p>14 Q -- of the screen.</p> <p>15 Before we talk about what data is actually displayed</p> <p>16 on these panels I just want to confirm how the data in</p> <p>17 those panels gets displayed.</p> <p>18 A Um-hmm.</p> <p>19 Q So the district details panel shows you the data for</p> <p>20 whichever district is selected in the District Selector;</p> <p>21 right?</p> <p>22 A Correct.</p> <p>23 Q Okay. And the details panel on the right side shows</p> <p>24 you the same data for smaller geographic units; right?</p> <p>25 A Yes. It does vary depending on certain things.</p>
<p style="text-align: right;">Page 51</p> <p>1 Q It shows you sort of -- I guess for now on the</p> <p>2 screen it's showing precinct details because I have</p> <p>3 precinct selected; is that right?</p> <p>4 A Yes, that's correct. And you have precinct lines</p> <p>5 selected, too, to be specific.</p> <p>6 Q Got it. Okay. And so what this is showing you on</p> <p>7 the right side is just the same data, but for whatever</p> <p>8 geography you've selected that you want to see the data</p> <p>9 for.</p> <p>10 A Yes, that's --</p> <p>11 Q Is that right?</p> <p>12 A Yes, that's correct.</p> <p>13 Q Okay. And that appears when you sort of hover over</p> <p>14 that particular geographic unit?</p> <p>15 A Yes.</p> <p>16 Q Okay. And the geographic units that are available,</p> <p>17 those include precincts, blocks, counties, and cities;</p> <p>18 right?</p> <p>19 A That's correct.</p> <p>20 Q Okay. And is that -- When you select county will it</p> <p>21 show you this data for all of the counties in say</p> <p>22 Washington?</p> <p>23 A Yes. For each county you're hovering over, yes.</p> <p>24 Q Okay. And the same thing for cities, when you turn</p> <p>25 on -- when you select cities and you want to see data for</p>	<p style="text-align: right;">Page 52</p> <p>1 particular cities, --</p> <p>2 A Yes.</p> <p>3 Q -- does this show you this data for all cities in</p> <p>4 Washington, or just some?</p> <p>5 A Yes. Yes, for all cities. And I'll just sort of</p> <p>6 just clarify that. So generally the cities -- So there</p> <p>7 are -- The census, this all comes from the census. They</p> <p>8 have a set of shapes, you know, areas on the map that are</p> <p>9 designated as places. It's like cities and towns. So</p> <p>10 it's generally cities, but it can -- It depends on if</p> <p>11 they're incorporated or not, or whatever. You know, that</p> <p>12 kind of thing.</p> <p>13 Q I see. So it's what this is showing you, the</p> <p>14 boundaries that this is showing you are census-placed</p> <p>15 boundaries; correct?</p> <p>16 A Yes, that's correct.</p> <p>17 Q And when you hover over a particular census place,</p> <p>18 what you called a city here in DRA, it will show you the</p> <p>19 selected data for that place?</p> <p>20 A Yes, that's right.</p> <p>21 Q Okay. And the way that you select the geographic</p> <p>22 unit for which you want to display data is just by</p> <p>23 selecting the geographic unit here next to the -- next to</p> <p>24 this sort of paint and eraser tool; right?</p> <p>25 A Yes, that's correct.</p>

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<p style="text-align: right;">Page 53</p> <p>1 Q Okay. Do these two panels, the district details</p> <p>2 panel and the city details panel, always display the same</p> <p>3 datasets?</p> <p>4 A Yes, they do.</p> <p>5 Q And the user can select which datasets they want to</p> <p>6 show or not show on these two panels; right?</p> <p>7 A Yes.</p> <p>8 Q Okay. So how does a user go about choosing what</p> <p>9 data to display on these panels?</p> <p>10 A So in like the upper right there's that little gear</p> <p>11 icon, and that's -- in there there's a data selector, so</p> <p>12 -- Do you want me to describe this in more detail?</p> <p>13 Q Yeah. What do I click to show which datasets to</p> <p>14 turn on or off here on these panels?</p> <p>15 A So there's two designations. There's the primary</p> <p>16 datasets and then other datasets.</p> <p>17 So you could change the primary dataset or census</p> <p>18 voting age population and election by clicking on, you</p> <p>19 know, that drop-down there. And so you can see there you</p> <p>20 can choose total population 2020, and that would be the</p> <p>21 unadjusted total population from the census in 2020.</p> <p>22 And what -- Primary datasets are distinguished in</p> <p>23 that they're used for things like the statistics page and</p> <p>24 analytics pages. Generally the analytics pages will</p> <p>25 operate off of the voting age, you know, for things like</p>	<p style="text-align: right;">Page 54</p> <p>1 minorities, et cetera, and then the election primary</p> <p>2 dataset for all the partisan metrics, but -- So those</p> <p>3 choices affect kind of this larger set of things.</p> <p>4 Now, if you want to just show additional datasets</p> <p>5 without changing those primary datasets, there's the</p> <p>6 second section display or hide datasets. So you can</p> <p>7 choose there, and you can add in whatever dataset you want</p> <p>8 to show; and they're just going to show up in the panels,</p> <p>9 but they have no effect on the statistics and analytics.</p> <p>10 Q Got it. And so this list that I'm showing here by</p> <p>11 clicking the display or hide datasets, --</p> <p>12 A Yes.</p> <p>13 Q -- is this a comprehensive list of the datasets</p> <p>14 available for Washington state?</p> <p>15 A Yes. Yes, it is.</p> <p>16 Q And some of those you can also choose to make your</p> <p>17 sort of primary dataset for the purposes of the statistics</p> <p>18 and Analyze page; correct?</p> <p>19 A Yes. Yes. And total population, you know, would be</p> <p>20 for your -- that District Selector panel, et cetera.</p> <p>21 Q Got it. So if we're just looking at this list, this</p> <p>22 is sort of the universe of datasets that you can choose to</p> <p>23 be looking at as you draw maps?</p> <p>24 A Yes, it is.</p> <p>25 Q Okay. And I'm going to -- Let me --</p>
<p style="text-align: right;">Page 55</p> <p>1 MR. MULJI: I'm going to mark as Exhibit 6</p> <p>2 Document H, DRA Datasets.</p> <p>3 (Bradlee Exhibit No. 6 introduced and displayed.)</p> <p>4 Q I'll represent to you that I just took a screenshot</p> <p>5 of this list.</p> <p>6 Does that appear to be what's represented here, a</p> <p>7 screenshot of the datasets available to show while you're</p> <p>8 drawing maps?</p> <p>9 A Yes. Yes, that's correct.</p> <p>10 Q So I'll go back to the live version, just it's a</p> <p>11 little easier. Well, it's actually not because I might</p> <p>12 accidentally click something.</p> <p>13 So I want to just sort of talk through the different</p> <p>14 datasets that you can turn on or off while you're drawing</p> <p>15 maps. So the first -- The first five datasets listed here</p> <p>16 are total pop adjusted 2020, total pop ACS 2020, total</p> <p>17 population 2020, total population 2019, and total</p> <p>18 population 2010; correct?</p> <p>19 A Yes.</p> <p>20 Q And the next five are variations on voting age</p> <p>21 population data; correct?</p> <p>22 A That's correct.</p> <p>23 Q And the first ten together are sort of providing the</p> <p>24 user an option to turn on different demographic data from</p> <p>25 different census years and data sources; correct?</p>	<p style="text-align: right;">Page 56</p> <p>1 A That's correct.</p> <p>2 Q Okay. And you can also choose to turn on citizen</p> <p>3 voting age population from among this list; correct?</p> <p>4 A That's correct.</p> <p>5 Q Okay. When the user selects any one of these first</p> <p>6 ten demographic datasets the details panel will show</p> <p>7 breakdowns by race and ethnicity; correct?</p> <p>8 A That's correct.</p> <p>9 Q Let me just -- Let me do that so you can see this.</p> <p>10 So in this example I've chosen total population</p> <p>11 adjusted, citizen voting age population 2020, and I've</p> <p>12 selected voting age population 2020, and I'm just going to</p> <p>13 apply those so you can see them.</p> <p>14 So now the details panels are showing the racial</p> <p>15 breakdown and ethnic breakdown for these different</p> <p>16 datasets?</p> <p>17 A Yes.</p> <p>18 Q Which racial ethnic groups are included for each of</p> <p>19 these, each of these datasets?</p> <p>20 A For the datasets that you're showing here these</p> <p>21 are -- Well, so you have, you know, white population.</p> <p>22 Hispanic is -- You know, these are all coming from the</p> <p>23 census -- is all Hispanics.</p> <p>24 And then each of the other race categories are the</p> <p>25 race combination census numbers. So, for example, for</p>

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<p style="text-align: right;">Page 57</p> <p>1 what's listed as Black is the census would designate that</p> <p>2 as Black alone or in combination with other races,</p> <p>3 including Hispanic.</p> <p>4 Q Okay. You have some of this information listed on</p> <p>5 your website; correct?</p> <p>6 A Yes.</p> <p>7 Q Why don't we -- Let's look at that real quick</p> <p>8 together.</p> <p>9 (Website displayed.)</p> <p>10 Q All right. It's the About Data page on the DRA</p> <p>11 website explains sort of the demographic data, among other</p> <p>12 things --</p> <p>13 A Yes.</p> <p>14 Q -- that you can display on DRA; correct?</p> <p>15 A Yes.</p> <p>16 Q So you were just mentioning that, you know, for the</p> <p>17 demographic datasets, those ten that we discussed, the</p> <p>18 population datasets, it shows, you know, these racial and</p> <p>19 ethnic group categories.</p> <p>20 Just running through them, white means white alone,</p> <p>21 not Hispanic; correct?</p> <p>22 A Yes.</p> <p>23 Q Okay. And like you said, Hispanic means all</p> <p>24 Hispanics regardless of race?</p> <p>25 A Yes.</p>	<p style="text-align: right;">Page 58</p> <p>1 Q Okay. And I think you were just explaining that for</p> <p>2 Black, Asian, Native and Pacific groups you're looking at</p> <p>3 that group alone or in combination with other races,</p> <p>4 including Hispanics?</p> <p>5 A That's correct.</p> <p>6 Q According to your website, that's sort of the racial</p> <p>7 breakdown available for all of the data except for, I</p> <p>8 think, one dataset; correct?</p> <p>9 A Yes. Yes. There is a different dataset, which is</p> <p>10 explained in that next section. Yeah.</p> <p>11 Q Okay. And so just for the 2020 voting age</p> <p>12 population with non-Hispanic race alone, for that dataset</p> <p>13 you provide the -- Well, can you explain what the</p> <p>14 difference is in the racial categories for that one?</p> <p>15 A Yes. So the white and Hispanic categories should be</p> <p>16 the same, identical to the others; but for the four,</p> <p>17 Black, Asian, Native and Pacific categories, those are the</p> <p>18 race alone, not Hispanic.</p> <p>19 So in other words, like for the Black category a</p> <p>20 person who on the census form designated themselves as</p> <p>21 Black and another race, right, Black and Native American,</p> <p>22 for example, they would not show up in that number that's</p> <p>23 displayed there. And then instead people who chose two or</p> <p>24 more races would show up in the two or more race category.</p> <p>25 Other is another race that's not any one of those listed</p>
<p style="text-align: right;">Page 59</p> <p>1 in the four.</p> <p>2 Q Okay. And this racial and ethnic breakdown where</p> <p>3 you sort of break out the combination racial category into</p> <p>4 its own thing, that's for -- that's for the dataset called</p> <p>5 VAP NH Race 2020, as I'm indicating here on the screen;</p> <p>6 right?</p> <p>7 A Yes, that's correct.</p> <p>8 Q Okay. And for all the rest of the demographic</p> <p>9 datasets it's the sort of first racial breakdown that we</p> <p>10 discussed?</p> <p>11 A That's correct, using the combination categories,</p> <p>12 yes. Yeah.</p> <p>13 Q Okay. And just to clarify, in each of these, in</p> <p>14 each of these demographic datasets you can see the white</p> <p>15 population alone, white alone, not Hispanic population?</p> <p>16 A Yes.</p> <p>17 Q And for each of these, in each of these datasets you</p> <p>18 can see the population that is Hispanic; correct?</p> <p>19 A Yes.</p> <p>20 Q Okay. And I just want to talk through sort of a few</p> <p>21 of these different datasets here. So total population</p> <p>22 2020 and voting age population 2020, what is the source of</p> <p>23 those two datasets?</p> <p>24 A That's the official 2020 U.S. Census release.</p> <p>25 Q And did you get those directly from the Census</p>	<p style="text-align: right;">Page 60</p> <p>1 Bureau?</p> <p>2 A Yes, from their website.</p> <p>3 Q And when was -- When were these two datasets made</p> <p>4 available in DRA?</p> <p>5 A Well, the census released them in what was it, late</p> <p>6 August, I believe, and -- You know, maybe just the second</p> <p>7 half of August. And we got them -- We brought them in for</p> <p>8 all states within four or five days after that, so late</p> <p>9 August.</p> <p>10 Q Okay. So shortly after the census --</p> <p>11 A I believe.</p> <p>12 Q -- released this data?</p> <p>13 A Yes. Yes.</p> <p>14 Q Okay. And then we talked about this a little bit,</p> <p>15 but there's also a total pop ADJ 2020, --</p> <p>16 A Yes.</p> <p>17 Q -- referring to the adjusted population data.</p> <p>18 What is this again?</p> <p>19 A Yeah, so that's a dataset released by the state, so</p> <p>20 in this case the state of Washington. So sometime after</p> <p>21 they received the U.S. Census data they -- I'm not sure</p> <p>22 what office, but they made -- they did their adjustments</p> <p>23 according to state law and then released that dataset,</p> <p>24 which we subsequently picked up and added to the app.</p> <p>25 Q And those adjustments were for prisoner</p>

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<p style="text-align: right;">Page 61</p> <p>1 reallocation; is that right?</p> <p>2 A Yes, that's my understanding.</p> <p>3 Q Is it your understanding that Washington sort of</p> <p>4 readjusts the census data to count individuals who are</p> <p>5 incarcerated in their home precincts rather than where</p> <p>6 they're incarcerated --</p> <p>7 A That is --</p> <p>8 Q -- for the purposes of redistricting?</p> <p>9 A Yes, that is correct.</p> <p>10 Q And when was the total population adjusted data made</p> <p>11 available in DRA?</p> <p>12 A I'm not -- I'm not sure. I don't quite remember.</p> <p>13 I'd have to -- I'd have to look it up, and --</p> <p>14 But, you know, I -- I know we tried to get that data</p> <p>15 in for the states that did that, you know, in time for</p> <p>16 them to do that. So I'm guessing September, but I'm not</p> <p>17 absolutely sure. I'd have to look that up.</p> <p>18 Q Okay. And those --</p> <p>19 A September, 2021, to be specific.</p> <p>20 Q September, 2021.</p> <p>21 A Yeah.</p> <p>22 Q Thank you. And so both these, all three of these</p> <p>23 that we discussed so far, total population 2020, voting</p> <p>24 age population 2020, and the total pop adjusted 2020, all</p> <p>25 three of these datasets were available for sort of all the</p>	<p style="text-align: right;">Page 62</p> <p>1 geographies that we've discussed, census block up to</p> <p>2 county or city; correct?</p> <p>3 A That's correct. Yeah, the data was released at the</p> <p>4 block level by the Census Bureau, and I'm pretty sure by</p> <p>5 the state itself for the adjusted population.</p> <p>6 Q Next I want to talk about the citizen voting age</p> <p>7 population category.</p> <p>8 A Right.</p> <p>9 Q There are two options for citizen voting age</p> <p>10 population, as far as I can see, --</p> <p>11 A Right.</p> <p>12 Q -- one for 2020 and then one for 2019.</p> <p>13 Can you tell me the source of -- Well, what is the</p> <p>14 citizen VAP 2020 data referring to?</p> <p>15 A Yeah. So the U.S. Census Bureau puts out what they</p> <p>16 call the five-year ACS data. So that's American Community</p> <p>17 Survey data. And then -- And that's the -- That's put out</p> <p>18 as total population data, but then they also from that</p> <p>19 create a special dataset for citizen voting age</p> <p>20 population; and that's what those two datasets represent.</p> <p>21 It's published by the Census Bureau.</p> <p>22 Q Okay. And so the 2020 is referring to the citizen</p> <p>23 voting age population as reported in the five-year 2020</p> <p>24 American Community Survey estimates?</p> <p>25 A Yes, that is correct. And I should note that I</p>
<p style="text-align: right;">Page 63</p> <p>1 can't quite remember when that was released. I think -- I</p> <p>2 think it might have been earlier this year in 2022, but</p> <p>3 I'd have to go back and look.</p> <p>4 You know, in other words, that the CVAP, citizen</p> <p>5 voting age population 2020 based on the ACS, I believe it</p> <p>6 was not released until 2022. I could look that up if you</p> <p>7 would like. That's publicly -- public knowledge, you</p> <p>8 know, available on the website.</p> <p>9 Q Well, maybe I can help you out just if we take a</p> <p>10 look at a tweet that I --</p> <p>11 (Document displayed.)</p> <p>12 A Um-hmm. Okay. Yes. We probably tweeted that we</p> <p>13 had released the ACS.</p> <p>14 Q I'm not going to make this an exhibit here, but do</p> <p>15 you recognize sort of the document that I've put up to be</p> <p>16 a tweet by DRA?</p> <p>17 A Yes. Yes. And I can see that's March of 2022. So</p> <p>18 that's -- Yeah, that's kind of -- That would be a correct</p> <p>19 date, just for -- Yeah, I just -- Yeah, I just wanted to</p> <p>20 note that.</p> <p>21 In other words, you know, the five-year ACS data and</p> <p>22 CVAP data, you know, always lags. So I think it normally</p> <p>23 is available in December of the year after whatever number</p> <p>24 it is. So in other words, normally December of 2021 it</p> <p>25 would be available, but because of the pandemic everything</p>	<p style="text-align: right;">Page 64</p> <p>1 was delayed, so -- Yeah.</p> <p>2 Q So the 2020 CVAP data was made available on DRA on</p> <p>3 or around March 31st, 2022?</p> <p>4 A That's correct.</p> <p>5 Q Okay. And the 2019 -- Well, right. So DRA also</p> <p>6 provides citizen voting age population data from 2019.</p> <p>7 Is this referring to --</p> <p>8 A Correct.</p> <p>9 Q This is referring to data from the American</p> <p>10 Community Survey five-year -- 2019 five-year estimates;</p> <p>11 correct?</p> <p>12 A That's correct. That's correct.</p> <p>13 Q And --</p> <p>14 A Yeah, so -- Go ahead. Sorry.</p> <p>15 Q When was -- When was that data made available on</p> <p>16 DRA; do you recall?</p> <p>17 A I believe it would have been December of 2020 or a</p> <p>18 little bit after that. You know, it might have been</p> <p>19 January of 2020. I'll have to go back and look to be</p> <p>20 sure, but I'm confident that that data was added to DRA</p> <p>21 before the census shapes came out.</p> <p>22 Q Oh, okay. Let me --</p> <p>23 A Well, I guess --</p> <p>24 Q -- verify when that data was available.</p> <p>25 A I guess -- I don't know. Maybe -- Maybe I should --</p>

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<p style="text-align: right;">Page 65</p> <p>1 I should just backtrack or clarify that statement because,</p> <p>2 you know, these -- So all this ACS and citizen voting age</p> <p>3 population data, we've married that data to the 2020</p> <p>4 shapes. In other words, the voting tabulation districts.</p> <p>5 So, of course, marrying that data to those districts</p> <p>6 would not have happened until those shapes came out,</p> <p>7 which, as we already mentioned, were in March of twenty --</p> <p>8 sorry -- March of 2021 was when the shapes came out. So</p> <p>9 it would have been in that timeframe that we added that</p> <p>10 citizen voting age population 2019.</p> <p>11 Q Okay. We'll talk about the marrying of that data in</p> <p>12 a moment, just --</p> <p>13 And so to nail down the timing of when this became</p> <p>14 available, I'm just pulling up on the screen a printout of</p> <p>15 a blog post --</p> <p>16 A Okay.</p> <p>17 Q -- by DRA.</p> <p>18 (Document displayed.)</p> <p>19 A Correct.</p> <p>20 Q Does that -- Does this appear to be a blog that you</p> <p>21 recognize?</p> <p>22 A Yes. And yeah, this doesn't mention CVAP, you</p> <p>23 know -- sorry -- citizen voting age population. So that</p> <p>24 might have happened a little bit after that, --</p> <p>25 Q Okay.</p>	<p style="text-align: right;">Page 66</p> <p>1 A -- but should have happened as soon as we -- or</p> <p>2 hopefully not that long after that. I'd have to go back</p> <p>3 and check, but maybe you have that.</p> <p>4 Q I didn't see an indication, but --</p> <p>5 So is it fair to say that it was, you know,</p> <p>6 probably -- definitely the spring of 2021 that 2019 CVAP</p> <p>7 data was added to DRA; is that right?</p> <p>8 A I believe so.</p> <p>9 Q Okay.</p> <p>10 A Yeah, I believe so.</p> <p>11 Q Okay. And you mentioned that sort of the citizen</p> <p>12 voting age population data --</p> <p>13 A Um-hmm.</p> <p>14 Q -- has to be married to, in your words, the sort of</p> <p>15 geographies that you're looking at in DRA.</p> <p>16 A Yes.</p> <p>17 Q How does that process work? How do you get citizen</p> <p>18 voting age population to appear for precincts, blocks,</p> <p>19 counties and cities in DRA?</p> <p>20 A Yeah, so -- So the ACS five-year data, both the</p> <p>21 total population and the citizen voting age population is</p> <p>22 released by the Census Bureau at the block group level.</p> <p>23 Okay. A block group is a little bit larger. It's a</p> <p>24 set of blocks. It's a census designation geography --</p> <p>25 census-designated geography. So, you know, that block</p>
<p style="text-align: right;">Page 67</p> <p>1 groups, you can kind of think -- size-wise you can think</p> <p>2 of them as roughly the same as precincts, give or take;</p> <p>3 but they're different than the precincts. In other words,</p> <p>4 different than the voting tabulation districts that are</p> <p>5 released with the census.</p> <p>6 So what has to happen is we have to disaggregate,</p> <p>7 basically disaggregate that data from the block group</p> <p>8 level to the block level. You know, we have to do that in</p> <p>9 order to represent it in blocks because the census does</p> <p>10 not release it at the block level.</p> <p>11 Q I think the term that you use on your website is you</p> <p>12 disaggregate the data to the block level; is that correct?</p> <p>13 A That's correct.</p> <p>14 Q Okay. And I'm pulling up the About Data page --</p> <p>15 A Um-hmm.</p> <p>16 Q -- on your website again on the screen.</p> <p>17 (Website displayed.)</p> <p>18 Do you see that?</p> <p>19 A Yes.</p> <p>20 Q You describe on this page sort of the disaggregation</p> <p>21 method that DRS uses. Can you say more about what method</p> <p>22 you use to disaggregate census ACS data to the block</p> <p>23 level?</p> <p>24 A Yes. Yeah, you know, so essentially what we have to</p> <p>25 do is -- So we have a program that I wrote, and what that</p>	<p style="text-align: right;">Page 68</p> <p>1 program does is it does an overlap of the two geographies.</p> <p>2 So in other words, the set of block groups and the set of</p> <p>3 what we call precincts, voting tabulation districts.</p> <p>4 So we figure out which ones overlap which, and then</p> <p>5 using, you know, essentially the percentages of the</p> <p>6 overlap. So, for example, you've got a block group, and</p> <p>7 we say oh, it overlaps these three precincts. You know,</p> <p>8 this one is 30 percent, and this one is, you know,</p> <p>9 50 percent; and this one is 20 percent.</p> <p>10 Okay. So then what we will do is for those --</p> <p>11 Sorry. Let me back up a little bit. I shouldn't say</p> <p>12 precincts. I should say census blocks; right? Because</p> <p>13 really that's what we're doing is we're going from the</p> <p>14 block. All right. Let me back up a little bit just to</p> <p>15 make sure I get this right on the record.</p> <p>16 So for the 2019 ACS and citizen voting age</p> <p>17 population, so that's released at the block group level,</p> <p>18 but that is the 2010 census blocks and block groups, which</p> <p>19 are different than the 2020 census block groups and</p> <p>20 blocks.</p> <p>21 Okay. So it's a different geography. So in other</p> <p>22 words, they made changes; right? So that's why we have to</p> <p>23 do this kind of work. We need to get a mapping in effect</p> <p>24 between the old and the new geography. Now, so what I was</p> <p>25 describing before is more applicable to the election data,</p>

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<p style="text-align: right;">Page 69</p> <p>1 so just -- You can scratch that.</p> <p>2 So this group called VEST, the Voting and Election</p> <p>3 Science Team, actually created a mapping between the 2010</p> <p>4 census blocks and the 2020 census blocks; and so we were</p> <p>5 able to use that mapping, so we didn't have to calculate</p> <p>6 the mapping ourselves.</p> <p>7 We used that mapping to say okay, we've got a block</p> <p>8 group. Now, that's -- We still have to -- We say here's a</p> <p>9 set of blocks that are in that block group for the 2019</p> <p>10 data. Now, we don't know --</p> <p>11 So the first thing we have to do -- You know, so</p> <p>12 we're still in this, you know, old blocks world -- is we</p> <p>13 have to distribute the population among those blocks. And</p> <p>14 essentially what we do there is we just take the</p> <p>15 population of each block and say okay, we're just going to</p> <p>16 distribute according to that percentage of, you know, this</p> <p>17 block represents a certain percentage of the block group,</p> <p>18 that we're going to send that many people in that block,</p> <p>19 and then et cetera for the other blocks.</p> <p>20 Now, when we do that we make sure to distribute</p> <p>21 every individual, so we use whole numbers. And that's</p> <p>22 where we talk about the Hare quota or Hamilton quota. You</p> <p>23 know, that's a standard mechanism for -- You know, because</p> <p>24 you end up with a fraction. Okay. Where do you put that</p> <p>25 one? Okay. So that's the method we use.</p>	<p style="text-align: right;">Page 70</p> <p>1 And then we map those to the 2020 blocks according</p> <p>2 to the mapping that they have, essentially using that same</p> <p>3 method, the Hare quota method. Okay.</p> <p>4 Q Let me try to distill -- Let me try to distill this</p> <p>5 a little bit --</p> <p>6 A Sorry.</p> <p>7 Q -- just so that --</p> <p>8 So basically you get the ACS -- You've got the ACS</p> <p>9 2019 data --</p> <p>10 A Yes.</p> <p>11 Q -- aggregated in block groups using 2010 shapes, and</p> <p>12 you've got the ACS 2020 data aggregated at 2020 block</p> <p>13 group shapes.</p> <p>14 A That's -- Yeah.</p> <p>15 Q And you're trying to estimate the population of each</p> <p>16 block, --</p> <p>17 A Right.</p> <p>18 Q -- the citizen voting age population of each block?</p> <p>19 A Right.</p> <p>20 Q And you used sort of a disaggregation method</p> <p>21 provided by Voting Election and Science Team.</p> <p>22 A Correct.</p> <p>23 Q I think you used their method to estimate the CVAP</p> <p>24 populations in each block, and you used that to construct</p> <p>25 sort of the CVAP population of the rest of the geographies</p>
<p style="text-align: right;">Page 71</p> <p>1 available in DRA.</p> <p>2 Is that an accurate summation?</p> <p>3 A That is correct, yes. That is correct.</p> <p>4 Q Okay.</p> <p>5 A Yeah.</p> <p>6 Q Great. So the user -- So what that means is that a</p> <p>7 user who is creating maps who has CVAP, 2019 CVAP turned</p> <p>8 on or 2020 CVAP turned on, they can see, you know, the</p> <p>9 white citizen voting age population of -- the estimated, I</p> <p>10 should say, white citizen voting population of every</p> <p>11 block, precinct, city, county that they're hovering over</p> <p>12 if they choose to see it; correct?</p> <p>13 A Yes.</p> <p>14 Q And they can also see for those same datasets the</p> <p>15 Hispanic citizen voting age population estimated at each</p> <p>16 of those geographies as well.</p> <p>17 A Yes.</p> <p>18 Q Is that correct?</p> <p>19 A Yes.</p> <p>20 Q Okay. All right. Taking a --</p> <p>21 A Just --</p> <p>22 Q Go ahead.</p> <p>23 A Could I just make one note there. You can see on</p> <p>24 that page we just left, you know, we have in red at the</p> <p>25 bottom that, you know, for those ACS and CVAP, you know,</p>	<p style="text-align: right;">Page 72</p> <p>1 there's some margin of error.</p> <p>2 We do want to let our users know that especially at</p> <p>3 the block levels but also the precinct levels, they're</p> <p>4 estimates. Those are all estimates. I mean, they're</p> <p>5 estimates from the Census Bureau, but they're estimates</p> <p>6 because of our disaggregation algorithm as well, compared</p> <p>7 to the census data, which is, I mean, is the official data</p> <p>8 all the way down to the block level.</p> <p>9 Q So CVAP numbers are estimates, but are they the --</p> <p>10 They're the method you use to try to provide the most</p> <p>11 accurate estimate that you can; correct?</p> <p>12 A Yes, that's right. That's right.</p> <p>13 Q Great. And for the recap, a user on DRA starting in</p> <p>14 about the spring of 2021 could see 2019 CVAP numbers.</p> <p>15 A Um-hmm.</p> <p>16 Q And then it wasn't until March, 2022 you said that</p> <p>17 they could then see 2020 CVAP numbers -- Yeah, 2020 CVAP</p> <p>18 numbers; is that right?</p> <p>19 A Well, that was the 2020 ACS. If you will -- If you</p> <p>20 will let me I will look up here, and I can tell you when</p> <p>21 we got the 2019 CVAP numbers in, if you would like that on</p> <p>22 the record.</p> <p>23 Q Yes, that would be great.</p> <p>24 A Because I have it in a file over here, I believe.</p> <p>25 Okay. I just have to look back here in time.</p>

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<p>1 Okay. Okay. So according to my record, and this</p> <p>2 is -- You could find this in the What's New tab in the app</p> <p>3 is that April 5th -- So we did release the 2019 citizen</p> <p>4 voting age population numbers in April, April 5th, 2021.</p> <p>5 Okay. And then -- Let's see here. But I should</p> <p>6 note that -- oops -- sorry. We changed that data -- For</p> <p>7 what it's worth for the record, we updated that data in</p> <p>8 June -- I've got June 9th, 2021 -- to reflect the use of</p> <p>9 the VEST group's disaggregation method.</p> <p>10 So we updated the data because we felt that that was</p> <p>11 going to make it more accurate than what we had done</p> <p>12 before. Because we used our own disaggregation method,</p> <p>13 but it was a little bit different. Okay?</p> <p>14 Q Great. Thank you --</p> <p>15 A Sure.</p> <p>16 Q -- for clarifying that.</p> <p>17 So we've talked about the demographic data. I want</p> <p>18 to move on to the election data now. So the DRA --</p> <p>19 MR. MULJI: Oh, did someone disappear? No.</p> <p>20 Q DRA also gives the user the option to display</p> <p>21 election data in the two details panels; correct?</p> <p>22 A Correct.</p> <p>23 Q And what election data is available on DRA?</p> <p>24 A You know, it varies by state, but the elections --</p> <p>25 We try to get various statewide elections. We don't have</p>	<p>1 any sort of either local elections or either U.S. House</p> <p>2 elections or legislative elections. We don't try to</p> <p>3 include those.</p> <p>4 So it's, you know, president, governor, attorney</p> <p>5 general, et cetera. We do have that composite as well,</p> <p>6 which I can explain if you would like me to.</p> <p>7 Q So I'll start with what you just told me, try to</p> <p>8 clarify that. So you provide sort of individual</p> <p>9 election -- results for individual elections from</p> <p>10 different statewide contests in the state.</p> <p>11 So in Washington listed here, well, on Exhibit 6,</p> <p>12 the screenshot of this page, it's the sort of last set of</p> <p>13 datasets listed here.</p> <p>14 A Right.</p> <p>15 Q And then -- Yeah, what is this composite 2016-2020</p> <p>16 dataset?</p> <p>17 A So yeah, so we created our own composite. It's</p> <p>18 composed of the last two presidential elections averaged</p> <p>19 together and then the governor and attorney general</p> <p>20 election averaged together. You know, the last, latest of</p> <p>21 those. And then the last two senatorial elections</p> <p>22 averaged together, and then we averaged all of those</p> <p>23 together.</p> <p>24 You know, in effect for Washington state since we</p> <p>25 have all six of those elections, it's the same as</p>
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<p>1 averaging those six elections together. In other words,</p> <p>2 that's the mean of those six elections.</p> <p>3 Q Okay. And so is it accurate to say that the</p> <p>4 election data that's displayed for each individual contest</p> <p>5 that appears in these panels is what the vote share would</p> <p>6 have been in that district or geographic unit for the</p> <p>7 Democratic, Republican, or other candidate in that</p> <p>8 contest?</p> <p>9 A Yes.</p> <p>10 Q Is that correct?</p> <p>11 A Yes, that's correct.</p> <p>12 Q How did DRA choose which statewide contests to</p> <p>13 include for Washington state?</p> <p>14 A You mean in the composite itself, or --</p> <p>15 Q No, to include at all as options.</p> <p>16 A Okay. Yeah. So, you know, in general what we have</p> <p>17 tried to get for each state is, you know, the presidential</p> <p>18 election, the governor's election, the senate elections.</p> <p>19 Those are sort of the most important ones in our view.</p> <p>20 We also try to -- You know, if available we try to</p> <p>21 get the attorney general's election, the lieutenant</p> <p>22 governor's election. You know, frankly, we don't</p> <p>23 generally try to get the treasurer, secretary of state or</p> <p>24 auditor. There -- It's really only available in a few</p> <p>25 states, but we happen to have that for Washington state.</p>	<p>1 Q Okay. So you based it in part on sort of the</p> <p>2 availability of the data for --</p> <p>3 A Yes.</p> <p>4 Q -- each contest?</p> <p>5 A Yeah, based on the availability. Yeah.</p> <p>6 Q And do you include uncontested elections in this</p> <p>7 list?</p> <p>8 A Well, okay. So there are none in Washington state</p> <p>9 in those -- in those -- the main categories that we care</p> <p>10 about.</p> <p>11 I guess sometimes you do get -- We have gotten</p> <p>12 elections where I think like for treasurer -- not in 2020,</p> <p>13 but I guess there was earlier a treasurer's election that</p> <p>14 I think it was two Republicans, and sometimes we get one</p> <p>15 that is two Democrats. But in general we will -- We will</p> <p>16 show the data.</p> <p>17 I guess the answer is if you have an uncontested</p> <p>18 election or an election -- There are cases like in</p> <p>19 California there was one where there was two Democratic</p> <p>20 candidates who ran for the senate because, you know, they</p> <p>21 have a top two election system as well as Washington.</p> <p>22 We will show that data -- I think -- but we will not</p> <p>23 include it in the composite. Yeah.</p> <p>24 Q Got it. Just to be really clear about what a user</p> <p>25 sees because we've talked about it a little bit in the</p>

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<p style="text-align: right;">Page 77</p> <p>1 abstract, so when a person drawing a map or viewing a map</p> <p>2 turns on, say, the 2020 treasurer race in Washington and</p> <p>3 they hover over, you know, the precinct or county or city</p> <p>4 or whatever, they'll see the number of votes for the</p> <p>5 Democratic candidate in that contest; correct?</p> <p>6 A Yes.</p> <p>7 Q They'll see the number of votes, I guess estimated</p> <p>8 votes, for the Republican candidate in that precinct?</p> <p>9 A Um-hmm.</p> <p>10 Q Correct? And then they'll see sort of the vote</p> <p>11 share percentages for those two?</p> <p>12 A Um-hmm.</p> <p>13 Q And I guess you also include an other category.</p> <p>14 A Yes.</p> <p>15 Q So those two, the votes and the vote share for</p> <p>16 candidates of third parties; is that correct?</p> <p>17 A Yes. Yes, who were independents or other parties,</p> <p>18 yeah.</p> <p>19 Q Okay. When were the 2020 contests election data</p> <p>20 made available in DRA?</p> <p>21 A I'd have to -- I'd have to look it up. For the</p> <p>22 state, you know, just generally what we do -- So almost</p> <p>23 all the election data comes from VEST, that organization,</p> <p>24 Voting and Science Election Team; and what we've done is,</p> <p>25 you know, as soon as they release their data we try to get</p>	<p style="text-align: right;">Page 78</p> <p>1 it into the app, you know, within days.</p> <p>2 So for Washington state I think it was -- Well, it</p> <p>3 was certainly a long time ago. I could look it up here if</p> <p>4 you want me to, or it -- Yeah, it's in that What's New</p> <p>5 thing, but I just -- I don't -- I don't exactly remember.</p> <p>6 Ah, yeah, so -- Let's see.</p> <p>7 Q I guess I'll just say was it prior to -- was it</p> <p>8 prior to the start of the 2021 redistricting process in</p> <p>9 Washington?</p> <p>10 A Yes. Yes, it was. It should have been. I mean, I</p> <p>11 can see here that we at least updated that data for</p> <p>12 Washington. It was at least added before August 28th,</p> <p>13 2021. Okay?</p> <p>14 Q Okay. And like the American Community Survey data,</p> <p>15 the election data also has to be sort of aggregated into</p> <p>16 the precinct on VTD boundaries on the block, the block</p> <p>17 boundaries that you have on DRA.</p> <p>18 What was the method, or -- What's the method of</p> <p>19 disaggregation and aggregation that you use for election</p> <p>20 data?</p> <p>21 A Yes. So yes, it has to be disaggregated. So when</p> <p>22 we receive the election data, you know, from the VEST</p> <p>23 group, it's -- We get that in terms of precincts, and</p> <p>24 so --</p> <p>25 Now, first I should say that those precincts are not</p>
<p style="text-align: right;">Page 79</p> <p>1 necessarily the same as the precincts that we have in our</p> <p>2 app, and the reason for that is that states and counties,</p> <p>3 you know, are continually updating their precincts. So</p> <p>4 what the Census Bureau released is a snapshot of what the</p> <p>5 state gave them at sometime before 2020, 2019, something</p> <p>6 like that.</p> <p>7 So anyway, so what we have to do is we take the</p> <p>8 geographic area represented in the precinct data that we</p> <p>9 get, and then we overlay that with the precinct data that</p> <p>10 we have that we got from the Census Bureau, the data</p> <p>11 that -- Sorry, the precinct shapes that we have that are</p> <p>12 in the app. We calculate the overlap area, and then we --</p> <p>13 Well, sorry. Sorry. We actually do that in blocks.</p> <p>14 So in other words, we have to take the incoming, the</p> <p>15 precincts, and overlay those on the census blocks that we</p> <p>16 have in our app. And then given that we distribute the</p> <p>17 votes from that precinct among those different blocks</p> <p>18 according to the population of those blocks, the total</p> <p>19 population, and then we use that same quota method to</p> <p>20 distribute every single visit as a whole vote.</p> <p>21 Q Okay. And so just to synthesize that, you just --</p> <p>22 This method that you just described is sort of estimating</p> <p>23 the election vote share for various candidates in blocks,</p> <p>24 and then you use that to sort of -- to provide the user</p> <p>25 the election data at larger geographies that are composed</p>	<p style="text-align: right;">Page 80</p> <p>1 of blocks, like precincts and VTDs and counties and</p> <p>2 cities; is that right?</p> <p>3 A Yes, that's correct. That is correct, yeah.</p> <p>4 Q Okay. Let's talk a little bit about some of the</p> <p>5 other -- briefly about some of the other data that a user</p> <p>6 can turn on or off.</p> <p>7 On the left panel -- Oh, actually can I just ask</p> <p>8 before we move on, just to clarify you said the sources of</p> <p>9 election data on DRA are the VEST group; is that right?</p> <p>10 A Yes.</p> <p>11 Q Okay. And on your About Data page you list for each</p> <p>12 state the sort of sources of the data for each contest.</p> <p>13 A Correct.</p> <p>14 Q And I just want to note there's a number of sources</p> <p>15 listed here. Is this an accurate -- Is this an accurate</p> <p>16 list of --</p> <p>17 A Yes.</p> <p>18 Q -- the sources of data for Washington state?</p> <p>19 A Yes, it is. So yeah, you'll see almost all the data</p> <p>20 that is married to the 2020 shapes comes from VEST, but</p> <p>21 there are a few datasets that come from elsewhere.</p> <p>22 So I guess, you know, now that you look at</p> <p>23 Washington state, it looks like the 2018 senate -- senate</p> <p>24 election, I wonder why we got it from a different</p> <p>25 location, from the MIT group. Okay.</p>

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<p style="text-align: right;">Page 81</p> <p>1 Q And just because -- Well, so I'm going to mark as</p> <p>2 Exhibit 7 sort of a printout of this About Data page from</p> <p>3 DRA. I'm going to put it in the chat, and can you just</p> <p>4 tell me whether, you know, whether Exhibit 7 is -- sort of</p> <p>5 is a -- whether you recognize it to be a printout of the</p> <p>6 About Data page?</p> <p>7 (Bradlee Exhibit No. 7 introduced and displayed.)</p> <p>8 A Yes. It looks like, yeah, from the -- from the</p> <p>9 portion of it I can see, yes, it does.</p> <p>10 Q And the URL here shown on the printout is the About</p> <p>11 Data page URL?</p> <p>12 A Yes, it is.</p> <p>13 Q Okay. Great. And when a user creates a new map are</p> <p>14 certain datasets shown by default in these two details</p> <p>15 panels?</p> <p>16 A Yes.</p> <p>17 Q What datasets are those that are shown by default?</p> <p>18 A Yeah, so, you know, we're going to show the three</p> <p>19 datasets that are selected in the Data Selector; and by</p> <p>20 default on a new map those are it's the total population,</p> <p>21 and it depends on the state. So if --</p> <p>22 You know, we try to select the adjusted total</p> <p>23 population data for states that have that data; and if we</p> <p>24 know that they're going to use the adjusted data for the</p> <p>25 particular plan type, you know, legislature versus</p>	<p style="text-align: right;">Page 82</p> <p>1 congress that is selected by the user, then we always use</p> <p>2 the census voting age population, and the composite is our</p> <p>3 default.</p> <p>4 Q Okay. And I'm just going to -- I'm just going to</p> <p>5 make a map as quick as we can to see. So I'm making a</p> <p>6 test map for Washington state legislature.</p> <p>7 Do you see that?</p> <p>8 A Um-hmm. Yep.</p> <p>9 Q And it shows -- Like you said, it shows the total</p> <p>10 population adjusted 2020, it shows the voting age</p> <p>11 population 2020, and it shows the composite 2016 to 2020</p> <p>12 election data split.</p> <p>13 A Yes. Yes.</p> <p>14 Q Is that correct?</p> <p>15 A Correct.</p> <p>16 Q Okay. And are these the same defaults that appear</p> <p>17 when you import -- Like no matter the method of creation,</p> <p>18 are these the default -- are these the defaults that a</p> <p>19 user sees when they create a new map?</p> <p>20 A So if you import a block assignment file or a</p> <p>21 shapefile, yes, we're going to default to this.</p> <p>22 If you have a map archive, you know, the JSON file</p> <p>23 that was saved from DRA, that will have in it -- it could</p> <p>24 have different primary datasets, and so it would show</p> <p>25 whatever that map has, whatever that archive saved.</p>
<p style="text-align: right;">Page 83</p> <p>1 Q I see. So whatever -- So for those JSON files, like</p> <p>2 whatever the user at the time that they exported the JSON</p> <p>3 file, whatever they were looking at you see that when you</p> <p>4 upload it to Dave's?</p> <p>5 A Yes. That would be -- At least the primary datasets</p> <p>6 would be selected, yes, would be that. Yeah.</p> <p>7 Q Okay. And when someone shares a map with you and</p> <p>8 you click the link to see it, do you -- You don't see</p> <p>9 these defaults; right? You see what the user had open</p> <p>10 when they were sharing the map with you; is that right?</p> <p>11 A Yes, that's correct.</p> <p>12 Q Okay. All right. I'm sorry. Now let's move on to</p> <p>13 the other data map like we were saying.</p> <p>14 So on the -- All right. So and the DRA user can</p> <p>15 sort of choose to turn on or off data layers that display</p> <p>16 data like on the map itself; right?</p> <p>17 A Yes.</p> <p>18 Q And those are shown on the left-hand panel on the</p> <p>19 colors panel and the overlays panel; right?</p> <p>20 A Yes.</p> <p>21 Q So for the colors panel, these are data layers that</p> <p>22 visualize the value of like a particular demographic or</p> <p>23 electoral indicator by shading districts or precincts;</p> <p>24 correct?</p> <p>25 A Correct.</p>	<p style="text-align: right;">Page 84</p> <p>1 Q Okay. I just want to walk through a few of these.</p> <p>2 What is the partisan lean map layer?</p> <p>3 A Okay. So in the -- So there's two sections, the</p> <p>4 district section and the precinct section. So in the</p> <p>5 district section that's going to show you the partisan</p> <p>6 lean, which I'll describe in a moment, of the districts.</p> <p>7 So in other words, it shades them according to the</p> <p>8 partisan lean.</p> <p>9 Now, what -- So that is going to use whatever the</p> <p>10 primary dataset is for elections is the dataset that's</p> <p>11 going to feed into that partisan lean. And then the</p> <p>12 partisan lean, it's calculated by our analytics</p> <p>13 components, and it is going to be the same as what you</p> <p>14 would see on the statistics page in terms of percentage.</p> <p>15 I mean, essentially it is -- It's just based on the</p> <p>16 percentage of people who vote Republican in that set of</p> <p>17 elections, whatever that election dataset is, versus the</p> <p>18 set of people who vote for Democrats in that same set of</p> <p>19 elections.</p> <p>20 Q And if the color of the district or precinct is</p> <p>21 shaded blue or darker blue, it indicates a level of</p> <p>22 support for Democrats; correct?</p> <p>23 A That's correct. That's correct, yeah.</p> <p>24 Q And if it's shaded sort of between light red and</p> <p>25 dark red, that indicates a share of support for Republican</p>

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1 candidates.  
 2 A Yes.  
 3 Q Is that correct?  
 4 A Yes. Yes. I should note that these are the default  
 5 colors, that you can change your color pallets to a few  
 6 different kinds of pallets.  
 7 Q Got it. And there's also for both precincts and  
 8 districts you can turn on a data layer called  
 9 demographics; correct?  
 10 A Correct.  
 11 Q And under demographics you can show a number of sort  
 12 of racial and ethnic categories?  
 13 A That's correct.  
 14 Q So here you can turn on, for example, and show and  
 15 represent the percentage of either a district or precinct  
 16 that is Hispanic; correct?  
 17 A That's correct.  
 18 Q What dataset is this, are these colors? What  
 19 dataset do these colors represent?  
 20 A They're based on the -- whichever primary dataset  
 21 you selected for voting age population.  
 22 Q Okay. So in the district -- If in the data selector  
 23 someone has for voting age selected citizen VAP 2020, this  
 24 data layer, demographics data layer will show you citizen  
 25 VAP members --

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1 A That's correct.  
 2 Q -- referenced in those colors on the map?  
 3 A That's correct. If you've -- Yeah, if you've chosen  
 4 citizen VAP, that would show it based on citizen VAP.  
 5 Q The darker the color -- By default, I guess, the  
 6 darker the color, the more members of that group you had  
 7 in the district or precinct?  
 8 A Yes. It's just a gray scale, yes.  
 9 Q Okay. And what is kind of -- I should say the  
 10 options available, it looks like you can show all  
 11 minorities.  
 12 What does that mean?  
 13 A Yeah. So that's, you know, the percentage of all  
 14 minorities. You know, of minority population, non-white  
 15 population, basically.  
 16 Q Okay. And then there's also you can show the  
 17 percentages of the geographic unit for the precinct or  
 18 district that's Hispanic?  
 19 A Correct.  
 20 Q As well as Black, Asian, Native, Pacific Islander?  
 21 A Correct.  
 22 Q Okay. And what does all groups mean?  
 23 A Yeah, so you kind of see there basically we show a  
 24 mosaic of all the groups. Now, you have to click the map  
 25 colors in the district -- yeah, or turn that off, yeah, to

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1 see that.  
 2 So this is a mosaic. There's a little -- I mean,  
 3 it's sort of below what your screen share is, but there's  
 4 a map key to the colors down there. So it's just -- Yeah,  
 5 it's a mosaic that shows according to that little graphic  
 6 there different -- So it's different colors for different  
 7 demographic groups. And also sometimes, you know, a  
 8 precinct will have a mix of different minorities, and  
 9 we're trying to represent that as well.  
 10 Q Got it. So this shows you sort of different  
 11 regional and ethnic categories, and it looks like the key  
 12 is showing you --  
 13 For example, like if it's blue, it will display the  
 14 precinct as -- It shows you a color -- What am I trying to  
 15 say here. Each color represents sort of a percentage of a  
 16 racial group. So if a precinct is over 75 percent  
 17 Hispanic, it will display as green according to this key  
 18 and so on; right?  
 19 A That's right. That's right. Yeah, so the colors,  
 20 they're not scales, but they're just according to that  
 21 key.  
 22 Q The colors are categories, and the categories are  
 23 threshold -- racial category population thresholds?  
 24 A Correct. That's correct.  
 25 Q Okay. What is swing? What is that data layer?

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1 A Swing allows you to compare the difference between  
 2 two elections.  
 3 In other words, you could say, you know, take the  
 4 2016 president election, 2020 president election, and see  
 5 on a precinct level what the -- what the change was  
 6 between those two.  
 7 Q Okay. And that's available just for precincts?  
 8 A Just for precincts, that's right.  
 9 Q Okay. And then for each of these sort of data  
 10 layers that we have discussed, --  
 11 A Um-hmm.  
 12 Q -- you said the user can change the opacity.  
 13 Does that mean they can just make it more or less  
 14 transparent?  
 15 A Yeah. You can kind of see that. Yes. Yeah.  
 16 Q Okay.  
 17 A Just yeah, whatever -- you know, whatever colors,  
 18 color layer we're showing it's going to make it, yeah,  
 19 more or less transparent.  
 20 Q And the racial dot layer, what does that mean?  
 21 A That is a brand new feature, so that -- It only  
 22 exists -- It's less than two weeks old.  
 23 Yeah, you have to turn -- Well, yeah, I mean, I  
 24 don't know if you want to go into it. It's -- It's just a  
 25 racial dot map, so it shows kind of for each precinct or

22 (Pages 85 to 88)

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<p style="text-align: right;">Page 89</p> <p>1 block --</p> <p>2 Yeah, so you can select which population you're</p> <p>3 going to use. I think you have to turn off your swing</p> <p>4 there. Let's see. Yeah, so if you -- Yeah, there you go.</p> <p>5 You can kind of see there's -- In that dialogue it</p> <p>6 describes which, what the colors mean. This is --</p> <p>7 Yeah, as I say, it's a brand new feature that my</p> <p>8 colleague just put in. There's -- Yeah, there's a blog</p> <p>9 post on Medium that discussed it in more detail, and it's,</p> <p>10 you know -- Yeah.</p> <p>11 Q Is it fair to say you can -- It allows you to see</p> <p>12 the distribution of different racial and ethnic groups in</p> <p>13 a single data layer?</p> <p>14 A Yes. Yes. That is --</p> <p>15 Q Okay.</p> <p>16 A That is a fair -- a fair statement.</p> <p>17 Q And it wasn't available during the 2021</p> <p>18 redistricting process, for example?</p> <p>19 A That is correct, it was not available.</p> <p>20 Q Okay.</p> <p>21 A Yeah.</p> <p>22 Q And I just want to go through in the overlays panel</p> <p>23 there's also a number of sort of geographic information</p> <p>24 layers that a user can turn on or off ---</p> <p>25 A Yeah.</p>	<p style="text-align: right;">Page 90</p> <p>1 Q -- on the bottom, left side of the screen.</p> <p>2 Just to walk through these really quick, a user can</p> <p>3 turn on and off the district lines; correct?</p> <p>4 A Yep. Yes.</p> <p>5 Q And turn on or off labels associated with those</p> <p>6 districts?</p> <p>7 A Yes.</p> <p>8 Q They can also turn on or off the precinct lines?</p> <p>9 A Yes.</p> <p>10 Q Correct? And for precincts, they can apply labels</p> <p>11 to all the precincts of a number of variety?</p> <p>12 A Yes.</p> <p>13 Q What are the labels for precincts?</p> <p>14 A Yeah, so it's you can select up to three of these</p> <p>15 values. So they're just really numeric values.</p> <p>16 And kind of an example is, you know, you could --</p> <p>17 You could put the total population, so you can show it</p> <p>18 directly on the map. It's just an aid to painting your</p> <p>19 map to know as you paint where certain -- you know, if</p> <p>20 there's a larger population here or there or a certain</p> <p>21 demographic population here or there.</p> <p>22 Q Okay. So just it adds a label to each precinct with</p> <p>23 a particular value or number that you choose?</p> <p>24 A That is correct.</p> <p>25 Q And of those options are total population. It looks</p>
<p style="text-align: right;">Page 91</p> <p>1 like you can also add the Hispanic population numbers and</p> <p>2 white Hispanic -- or white population numbers and other</p> <p>3 racial group numbers as well.</p> <p>4 A Yeah. It's essentially the same numbers that you</p> <p>5 can see in the panels when you hover over the precinct.</p> <p>6 Q The user can also turn on and off county lines and</p> <p>7 labels; correct?</p> <p>8 A Yes.</p> <p>9 Q And the same thing for cities?</p> <p>10 A Yes.</p> <p>11 Q There's a panel here for custom overlays.</p> <p>12 A Yes.</p> <p>13 Q What are custom overlays?</p> <p>14 A Yeah, so you can -- You can add a shapefile layer</p> <p>15 that you get from somewhere else, or you can add as a</p> <p>16 layer another map that you created.</p> <p>17 So an example like would be if you have communities</p> <p>18 of interest, that maybe you've made a map of communities</p> <p>19 of interest, and then you want to overlay those on the map</p> <p>20 so you can see where those communities are, that's what</p> <p>21 this can be used for.</p> <p>22 Q Okay. Any other kind of like types of data that a</p> <p>23 user can import and view as an overlay here?</p> <p>24 A Well, it's just -- Yeah, it's either a shapefile or</p> <p>25 GeoJSON, or another map that you've already created or is</p>	<p style="text-align: right;">Page 92</p> <p>1 publicly available in DRA. You know, those are the two</p> <p>2 formats. Yeah.</p> <p>3 Now, people -- You can see, you know, we do have</p> <p>4 landmarks. You know, there's that facility for showing</p> <p>5 landmarks. There's a control for showing landmarks. So</p> <p>6 if you import a layer that has landmarks in it, we can</p> <p>7 show those as well.</p> <p>8 Q And I failed to mention that there's also sort of an</p> <p>9 option called map. Is that just it shows a -- It allows a</p> <p>10 user to turn on or off a base map showing like, you know,</p> <p>11 names of places and whatnot?</p> <p>12 A Yeah, that's just -- It's a background map of the</p> <p>13 area that yeah, we get from our mapping service.</p> <p>14 Q Okay. And for custom overlays a user can add, you</p> <p>15 know, other -- If they're interested in sort of other</p> <p>16 geographic boundaries within the state, like school</p> <p>17 district boundaries or whatnot, they can upload that using</p> <p>18 this custom overlay panel; right?</p> <p>19 A That is correct. That is, yeah, absolutely correct.</p> <p>20 Yeah.</p> <p>21 Q And can they -- Can these layers be turned on or off</p> <p>22 by the user?</p> <p>23 A Yes.</p> <p>24 Q Like are visible or invisible, I should say?</p> <p>25 A Yeah. So once, you know, if you have an overlay</p>

23 (Pages 89 to 92)

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<p style="text-align: right;">Page 93</p> <p>1 listed in that panel, you know, there's sort of various</p> <p>2 options. You can show the lines. You can show like a</p> <p>3 color overlay. You can turn on and off the landmarks or</p> <p>4 the labels as well.</p> <p>5 Q When a person shares -- When you've created a map</p> <p>6 and you have turned on some overlays that you've added to</p> <p>7 the map --</p> <p>8 A Um-hmm.</p> <p>9 Q -- and you share that map with someone else, can the</p> <p>10 person who is viewing your map see your custom overlays</p> <p>11 that you've turned on?</p> <p>12 A Yes.</p> <p>13 Q And can the user who is viewing your shared map, can</p> <p>14 they also turn on and off the custom overlay data?</p> <p>15 A That's a good question. Sorry. I think in -- If</p> <p>16 you have a view-only view, I think that you cannot turn on</p> <p>17 and off those custom layers.</p> <p>18 Q Okay.</p> <p>19 A I mean, there's no reason that we shouldn't allow</p> <p>20 you to do that, but I don't think we do. I don't think we</p> <p>21 allow that.</p> <p>22 Q Okay. But you can see what sort of the person who</p> <p>23 is creating the map, you can see what -- if they had it</p> <p>24 on, you could see it?</p> <p>25 A Yes.</p>	<p style="text-align: right;">Page 94</p> <p>1 Q You could see that they had it on?</p> <p>2 A Yes. You could see those lines, yeah.</p> <p>3 MR. MULJI: Okay. So I think I've probably</p> <p>4 have -- I said it was going to be short, but I actually</p> <p>5 think I have, given the pace we're going, probably about</p> <p>6 another -- about an hour.</p> <p>7 We can take a break. I would love to take like a</p> <p>8 five-minute break at this point, --</p> <p>9 THE WITNESS: Um-hmm.</p> <p>10 MR. MULJI: -- but we can also take a</p> <p>11 longer break if you would like. Or if counsel prefer, we</p> <p>12 can just sort of power through and try to get through it</p> <p>13 rather than break for lunch.</p> <p>14 But I would pose the option to folks here.</p> <p>15 THE WITNESS: So you said like another</p> <p>16 hour?</p> <p>17 MR. MULJI: I think so, yeah.</p> <p>18 THE WITNESS: Okay. Yeah, I guess a break</p> <p>19 would be good. I just want to -- And it doesn't have to</p> <p>20 be a long break, but I could just grab a quick -- quick</p> <p>21 snack or something like that would be great.</p> <p>22 MR. MULJI: Okay. For the folks --</p> <p>23 MR. HOLT: I will note intervenor</p> <p>24 defendants have probably 15-20 minutes of questions, so</p> <p>25 just a couple to follow up.</p>
<p style="text-align: right;">Page 95</p> <p>1 MR. MULJI: Okay.</p> <p>2 THE WITNESS: Okay.</p> <p>3 MR. HUGHES: You want to just take like a</p> <p>4 half hour lunch break, Aseem?</p> <p>5 MR. MULJI: Yeah, let's just do that.</p> <p>6 Let's just do that then. So let's say we'll meet back</p> <p>7 here at 1:00 p.m. Pacific.</p> <p>8 (Discussion off the record.)</p> <p>9 (Break 12:30 p.m. to 1:01 p.m.)</p> <p>10 Q (By Mr. Mulji) Dave, I want to ask you next about</p> <p>11 some of the metrics available to analyze legislative</p> <p>12 redistricting plans.</p> <p>13 So first to confirm, DRA enables viewers of a</p> <p>14 legislative district plan to see certain metrics or</p> <p>15 statistics about that district plan; right?</p> <p>16 A Yes.</p> <p>17 Q Does DRA allow viewers to see compactness scores for</p> <p>18 legislative district plans?</p> <p>19 A Yes.</p> <p>20 Q Can you explain what a compactness score is?</p> <p>21 A So there are -- There are a number of compactness</p> <p>22 measurements that people in academics, et cetera, have</p> <p>23 proposed -- you know, been around for a while. That's</p> <p>24 just a math problem, geometry problem.</p> <p>25 So we've chosen two metrics that seem to -- seem to</p>	<p style="text-align: right;">Page 96</p> <p>1 be pretty common, pretty widely used, and we calculate</p> <p>2 those metrics for compactnesses.</p> <p>3 Q What are those two metrics?</p> <p>4 A It's the -- I know -- Polsby-Popper and Reock</p> <p>5 scores. That's the two.</p> <p>6 Q And are those available -- Are those available</p> <p>7 for --</p> <p>8 Is it correct that the Reock and Polsby-Popper</p> <p>9 scores can be calculated for the plan as a whole and for</p> <p>10 specific districts?</p> <p>11 A Well, I think they're -- I believe -- So this is not</p> <p>12 my area of expertise -- that, you know, we calculate them</p> <p>13 on the district shapes.</p> <p>14 You know, because that's really what you're talking</p> <p>15 about when you're talking compactness, and then we're</p> <p>16 somehow aggregating them. Exactly how I can't say. I</p> <p>17 don't know. And I would refer you to a Medium post that</p> <p>18 my colleague wrote that describes that in more detail and</p> <p>19 references the sources, academic sources.</p> <p>20 Q Okay. And so you said that it will -- So DRA then</p> <p>21 provides the Reock and Polsby-Popper scores for district</p> <p>22 shapes, each individual district's shape; correct?</p> <p>23 A Well, I think -- I think that the way it's</p> <p>24 calculated. You know, it's calculated based on all of the</p> <p>25 different shapes; right?</p>

24 (Pages 93 to 96)

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<p style="text-align: right;">Page 97</p> <p>1 Because, you know, like if you look at the whole</p> <p>2 map, that's just one big shape; right? So you have to</p> <p>3 really look at the individual shapes, but how they are</p> <p>4 aggregated together, how those -- I'm not sure exactly how</p> <p>5 the algorithm works.</p> <p>6 Q Okay. Let's just --</p> <p>7 A But that information is available to somebody who</p> <p>8 wants to take a look.</p> <p>9 Q And just to confirm like what information is</p> <p>10 available on DRA, I'm pulling up the same sample map that</p> <p>11 we were looking at.</p> <p>12 A Um-hmm.</p> <p>13 (Map displayed.)</p> <p>14 Q The Reock and Polsby-Popper scores are available.</p> <p>15 What panel are they available on?</p> <p>16 A On the Analyze panel, Analyze view.</p> <p>17 Q On the Analyze page there's a section for</p> <p>18 compactness, --</p> <p>19 A Yep.</p> <p>20 Q -- and it provides, I see, the Reock score and the</p> <p>21 Polsby-Popper score for the plan?</p> <p>22 A That's correct.</p> <p>23 Q Okay. And if you -- I think if you go to advanced,</p> <p>24 it also provides compactness details for the scores by</p> <p>25 district; is that correct?</p>	<p style="text-align: right;">Page 98</p> <p>1 A That's correct.</p> <p>2 Q Okay.</p> <p>3 A I guess we also provide that last -- the --</p> <p>4 Q What is that score?</p> <p>5 A Well, that stands for Know It When You See It.</p> <p>6 That's what that, you know, KIWI stands for.</p> <p>7 And it's actually another -- another score proposed</p> <p>8 by a different academic, so that we added that, that score</p> <p>9 as well. Yeah.</p> <p>10 Q And the Know It When You See It score is represented</p> <p>11 in the compactness details in DRA, and it's labeled as</p> <p>12 KIWIYSI score, just for the record.</p> <p>13 A Yeah, that's correct. That's correct.</p> <p>14 Q Okay. DRA also reports the population of each</p> <p>15 district in a plan, as we've discussed; correct?</p> <p>16 A Yes.</p> <p>17 Q And it also shows you sort of the population</p> <p>18 deviation percentage for each district in a legislative</p> <p>19 district plan?</p> <p>20 A Yes.</p> <p>21 Q And it also reports sort of the overall population</p> <p>22 deviation percentage of the legislative plan as a whole;</p> <p>23 correct?</p> <p>24 A Yes. Sort of -- I believe that's from the biggest</p> <p>25 to the smallest.</p>
<p style="text-align: right;">Page 99</p> <p>1 Q And is that on the --</p> <p>2 A That's on the statistics page. Right. So you can</p> <p>3 see, yeah, plus or minus is that deviation, and then down</p> <p>4 at the last column has the -- I believe that would be</p> <p>5 correct, the .25 percent is the percent difference</p> <p>6 between, you know, the smallest and the largest district.</p> <p>7 Q Got it. Okay. And DRA also enables viewers to see</p> <p>8 a measure of how much counties are split across districts</p> <p>9 in the legislative redistricting plan; correct?</p> <p>10 A Yes. Yes. How districts split counties, yeah.</p> <p>11 Q Okay. And where is -- Is that also in the Analyze?</p> <p>12 A Yes. Yeah. I'll note, you know, there are some</p> <p>13 links right at the very top of this page, so you can go</p> <p>14 right to the splitting section next time.</p> <p>15 Q Thank you. I appreciate the overall Dave's tutorial</p> <p>16 that we're getting on this during this deposition.</p> <p>17 Okay. So in the splitting section of the Analyze</p> <p>18 page it looks like it gives you two metrics. It tells you</p> <p>19 the county district splitting and the district county</p> <p>20 splitting.</p> <p>21 Can you just tell me what those two things mean?</p> <p>22 A Yeah. So the first, yeah, how many counties are</p> <p>23 split across districts and how much -- The other one is</p> <p>24 how much -- second district county splitting, how much</p> <p>25 districts are split across counties. Just a different,</p>	<p style="text-align: right;">Page 100</p> <p>1 sort of a different way of looking at the problem.</p> <p>2 Again, these are algorithms that were designed by</p> <p>3 some academics. And so there's a Medium post. The little</p> <p>4 information icon in the upper right of the section takes</p> <p>5 you to the Medium post, which sort of describes them in</p> <p>6 more detail.</p> <p>7 Q Okay. And is there a function to print a map from</p> <p>8 DRA?</p> <p>9 A No, there's not.</p> <p>10 Q Okay. You were also in this case issued a subpoena</p> <p>11 for documents and records in this case; correct?</p> <p>12 A Um-hmm.</p> <p>13 Q And those were issued --</p> <p>14 A Yes.</p> <p>15 Q -- by plaintiffs' counsel?</p> <p>16 A Yes.</p> <p>17 Q Let's talk a little bit about your productions in</p> <p>18 response to that subpoena.</p> <p>19 A Okay.</p> <p>20 Q So I want to mark as Exhibit 8 Document L.</p> <p>21 (Bradlee Exhibit No. 8 introduced and displayed.)</p> <p>22 Q Do you see this document on your screen? And</p> <p>23 actually before you answer that, I'm just going to -- I'm</p> <p>24 just going to put it in the chat. I'll remember to do</p> <p>25 that.</p>

25 (Pages 97 to 100)



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<p>1 A Yes. Yes, I can see that. Yes. Sorry.</p> <p>2 Q Okay. And you've seen this document before?</p> <p>3 A Yes.</p> <p>4 Q And do you recognize this document to be the</p> <p>5 subpoena for documents and records to DRA from the</p> <p>6 plaintiffs in this lawsuit served on August 8th, 2022?</p> <p>7 A Yes.</p> <p>8 Q Okay. And have you reviewed the specific document</p> <p>9 requests starting on page -- well, let's see -- on page 5</p> <p>10 of the attachment to the subpoena?</p> <p>11 A Yes, I have.</p> <p>12 Q Okay. And do you understand that this subpoena asks</p> <p>13 DRA to produce in general all documents and data</p> <p>14 associated with 12 specified individuals involved in the</p> <p>15 Washington redistricting process?</p> <p>16 A Yes.</p> <p>17 Q And those 12 individuals are listed in each request</p> <p>18 here; correct?</p> <p>19 A Yes.</p> <p>20 Q And do you understand that the documents and data</p> <p>21 associated with these individuals includes, but is not</p> <p>22 limited to, so the items listed in parts A through --</p> <p>23 subparts A through G of each of these numbered requests?</p> <p>24 A Yes.</p> <p>25 Q Okay. So you produced a partial response to these</p>	<p>1 requests to plaintiffs' counsel on August 22nd; correct?</p> <p>2 A I believe that I asked for an extension, and that</p> <p>3 date was later than that; but I can't quite remember. I</p> <p>4 know there was I did a partial, and then I did the full</p> <p>5 response, but I don't remember the exact dates.</p> <p>6 MR. MULJI: Okay. I'd like to mark as</p> <p>7 Exhibit 9 Document M.</p> <p>8 (Bradlee Exhibit No. 9 introduced and displayed.)</p> <p>9 Q Do you recognize Exhibit 9?</p> <p>10 A Yes. So okay, I did do this partial response on the</p> <p>11 22nd, so you're correct there. And I did -- The full</p> <p>12 response I guess was sometime in September, right.</p> <p>13 Q And do you know -- Have you seen this document</p> <p>14 before, Exhibit 9?</p> <p>15 A Yes. Yes.</p> <p>16 Q What is it?</p> <p>17 A Well, this is my -- You know, my -- as representing</p> <p>18 DRA, Dave's Redistricting -- my response or partial</p> <p>19 response to the subpoena. I guess -- Right. I guess this</p> <p>20 was the -- Yeah, go ahead. So yes.</p> <p>21 Q So was this -- This was a letter I think you sent to</p> <p>22 plaintiffs' counsel accompanying your first sort of</p> <p>23 partial production; correct?</p> <p>24 A Yes, that's correct.</p> <p>25 Q And this production included data and documents</p>
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<p>1 associated with four of the 12 individuals that</p> <p>2 plaintiffs' counsel requested information for; correct?</p> <p>3 A That's correct.</p> <p>4 Q And who were the four people that you provided</p> <p>5 documents for initially?</p> <p>6 A Well, I guess these were the four people that you,</p> <p>7 as counsel for the plaintiffs, had indicated were ones</p> <p>8 that you wanted sooner rather than later. And so it's</p> <p>9 Paul Graves, Joe Fain, Pablo Campos and Anton Grose, if</p> <p>10 I'm pronouncing those names correctly.</p> <p>11 Q And what steps did DRA take to prepare this</p> <p>12 August 22nd partial production?</p> <p>13 A Excuse me. So all of the information that we have</p> <p>14 on any account is in our database. We have really a</p> <p>15 single database that exists in the cloud on Amazon Web</p> <p>16 Services.</p> <p>17 And so we have different tools that we can use to</p> <p>18 ask the database for different pieces of information</p> <p>19 about, you know, the user metadata or, you know, data</p> <p>20 about individual maps, that kind of thing. And so I used</p> <p>21 those tools to --</p> <p>22 Well, I guess I should say first of all, I should</p> <p>23 clarify that, you know, we have -- Every account, as I</p> <p>24 mentioned earlier, is based on an email address. So we</p> <p>25 don't necessarily have a person's name, so we don't know</p>	<p>1 for sure, you know, there's an email address out there.</p> <p>2 You know, we don't know a hundred percent what email</p> <p>3 address might be associated with what individual.</p> <p>4 So on these individuals I'm not sure -- I know that</p> <p>5 there were -- There might have been some times when the</p> <p>6 request, the plaintiff in requesting this provided an</p> <p>7 email address. I don't quite remember.</p> <p>8 But for those where the subpoena asked for</p> <p>9 individuals by name, as is related here, what I had to</p> <p>10 do -- what I did is I looked in our user file. So I had a</p> <p>11 list of all our users, user accounts. And I looked for</p> <p>12 email addresses that were reasonably obvious or, you know,</p> <p>13 reasonably associated with the individuals that were</p> <p>14 requested, and I've sort of indicated that in the</p> <p>15 description in this response.</p> <p>16 Then once I identified those accounts, then I would</p> <p>17 use other tools to pull the information about those</p> <p>18 accounts that was requested by the subpoena.</p> <p>19 Q Okay. So you searched for accounts linked to sort</p> <p>20 of the relevant individuals, and you said you did that by</p> <p>21 just doing sort of a search of your user accounts.</p> <p>22 What did you -- What did you search from your list</p> <p>23 of user accounts to identify accounts plausibly associated</p> <p>24 with the individuals that documents were requested for?</p> <p>25 A Well, again, you know, the only way we can identify</p>

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<p>1 is by the email address. So, for example, for --</p> <p>2 Let's just take one of the first names you have</p> <p>3 there, Paul Graves. You know, so I searched for Paul</p> <p>4 Graves or Graves. You know, was there an email address</p> <p>5 that was plausibly Paul Graves's email address in the</p> <p>6 account.</p> <p>7 Q Okay. And --</p> <p>8 A And you kind of see what the results are in this</p> <p>9 document.</p> <p>10 Q Let's talk about the results then. So for the --</p> <p>11 Well, let's start with maybe Anton, Anton Grose.</p> <p>12 A Um-hmm.</p> <p>13 Q Well, I'm sorry. Actually, why don't we start with</p> <p>14 the order that they're listed here in your letter.</p> <p>15 A Right.</p> <p>16 Q So did you find any accounts associated with Joe</p> <p>17 Fain?</p> <p>18 A No.</p> <p>19 Q And did you have any email addresses that you used</p> <p>20 to search for accounts associated with Joe Fain, or just</p> <p>21 permutations of his name?</p> <p>22 A I don't know of any email addresses. I don't</p> <p>23 believe I was provided with any email address for</p> <p>24 Joe Fain.</p> <p>25 Q Okay. And did you find any accounts plausibly</p>	<p>1 associated with Paul Campos?</p> <p>2 A No, I did not.</p> <p>3 Q Okay. And again for Joe Fain and Paul Campos, did</p> <p>4 you just search sort of permutations of their name to</p> <p>5 locate accounts that were plausibly associated with them?</p> <p>6 A Yes, that's correct.</p> <p>7 Q Okay. And did either of them -- Did either of these</p> <p>8 users ever submit a request to DRA to have their account</p> <p>9 deleted if they had one?</p> <p>10 A No. I'm reasonably sure that they did not.</p> <p>11 Q Does DRA have sort of a document retention policy?</p> <p>12 I'm speaking generally here.</p> <p>13 And I'm sorry, can you hear me, or is it -- Are you</p> <p>14 hearing background noise?</p> <p>15 A I know there's some background noise from somewhere.</p> <p>16 Q That's me.</p> <p>17 A It's not me. I don't know where it's coming from.</p> <p>18 Q I think -- Is that better?</p> <p>19 A As in somebody outside there? Yeah. Yeah.</p> <p>20 So we do not have a written document retention</p> <p>21 policy. As I mentioned before, you know, all the -- You</p> <p>22 know, all the information that is relevant to the subpoena</p> <p>23 comes from our database, and we --</p> <p>24 You know, we don't really delete -- We don't delete</p> <p>25 things from the database, with a few exceptions. One is</p>
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<p>1 an individual specifically requests to have their account</p> <p>2 deleted, in which case we'll delete that, and that will</p> <p>3 delete all the maps associated with that account.</p> <p>4 And if the -- We will periodically purge the set of</p> <p>5 maps that people put in the trash, you know, that they</p> <p>6 marked -- They deleted the maps, but it would only be</p> <p>7 after some period of time when we would periodically purge</p> <p>8 that set of maps. Otherwise we don't delete anything.</p> <p>9 Q Okay.</p> <p>10 A Yeah. You know, I should mention, you know, we have</p> <p>11 email -- You know, we have our email lists with, you know,</p> <p>12 requests for help or a bug fix, or anything like that.</p> <p>13 And we don't have any specific retention policy on that,</p> <p>14 you know, and so we might have deleted in the past some of</p> <p>15 those.</p> <p>16 We certainly have not deleted anything associated</p> <p>17 with any of these individuals who have emailed us since we</p> <p>18 received the subpoena.</p> <p>19 Q In response to the subpoena did you conduct a search</p> <p>20 for any email communications, support communications you</p> <p>21 might have received from the user accounts that you</p> <p>22 identified that are associated with the people who were</p> <p>23 asked about?</p> <p>24 A No, I did not.</p> <p>25 Q Okay. Let's keep going through this list then to</p>	<p>1 see which accounts you plausibly found.</p> <p>2 So for Paul Graves, did you find an account</p> <p>3 associated with Paul Graves?</p> <p>4 A Yeah, one account that is plausibly associated with</p> <p>5 Mr. Graves.</p> <p>6 Q And what was that? What was the email address</p> <p>7 associated with that account?</p> <p>8 A Yeah, it's P_Graves@Hotmail.com.</p> <p>9 Q Okay. And for Anton Grose?</p> <p>10 A I found two accounts that were plausibly associated</p> <p>11 with Mr. Grose. You can see them there,</p> <p>12 Anton.Grose@Leg.Wa.Gov, and AntonGrose@Yahoo.com.</p> <p>13 Q So once you found these accounts that are plausibly</p> <p>14 associated with the user or the individuals that were</p> <p>15 asked about what --</p> <p>16 A Um-hmm.</p> <p>17 Q You compiled documents and data concerning these</p> <p>18 user accounts; correct?</p> <p>19 A Yes.</p> <p>20 Q And you said that you sort of queried your database</p> <p>21 for certain documents --</p> <p>22 A Yes.</p> <p>23 Q -- that were requested in the subpoena?</p> <p>24 A Yes.</p> <p>25 Q What did you search for in the database for each of</p>

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1 these individuals?

2 A So I would -- For those accounts, so I would get the

3 metadata for the account. So that's things like, you

4 know, when the account was created, when it was last --

5 the user last logged in, that kind of thing.

6 And then for that account what were -- what's the

7 list of maps that was created by that account. And then,

8 as you had requested in the subpoena, the set of maps of

9 other people's that that account had -- had viewed.

10 And as I mentioned here, you know, you earlier

11 talked about the Shared With Me, and that's really what

12 that referenced maps refers to, things that are in the

13 Shared With Me list for that account.

14 Q And then you also provided, I think, users who

15 viewed other users' -- a list of users who viewed maps

16 created by the user account that you were searching?

17 A Yes, that is correct. Yeah, based on the request in

18 the subpoena.

19 So if a user who was an individual whose information

20 was requested by the subpoena had created a map, we would

21 also look and see had anyone else, any other account

22 looked at those maps, and so we made a -- We provided that

23 information as well.

24 Q Okay. And when you say so for each of these user

25 accounts you made a search, so, for example, Anton Grose,

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1 you found two accounts plausibly associated with an

2 individual named Anton Grose?

3 A Um-hmm.

4 Q And you searched for these items for both of those

5 email address accounts?

6 A That's correct.

7 Q And when you say -- So the map -- So in terms of

8 like the maps viewed by that user account, --

9 A Um-hmm.

10 Q -- I think you referred to those maps as quote,

11 unquote, "referenced maps;" is that right?

12 A Yes.

13 Q So a reference map --

14 A Yeah, a --

15 Q Go ahead. Sorry.

16 A Yeah, so reference maps, so when we say like, for

17 example, one of the Anton Grose accounts, if that had a

18 set of reference maps, it's maps that that account, you

19 know, whoever is using that account, those maps were in

20 the Shared With Me list.

21 In other words, they had viewed a publicly available

22 map or viewed a map that was some link that somebody maybe

23 had given to them or they obtained in some way.

24 Q Okay. And so the --

25 A So it's reference maps.

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1 Q For each user you produced, according to this

2 letter, it seems a created maps text file that lists all

3 the maps created by the user; correct?

4 A Yes.

5 Q And then you created a -- You provided a referenced

6 maps text file, and that's all the maps that the user

7 viewed; correct?

8 A Yes. Yes. Yeah.

9 Q And then you provided a references.text file, and

10 that file provided a list of all the users who viewed the

11 maps created by that user; correct?

12 A That's correct. That's correct.

13 Q Okay. Great. Thank you.

14 So just I want to run through sort of what you found

15 for each of these users that you noted here in the letter.

16 How many created maps did you find for Paul, for the

17 one account associated with Paul Graves?

18 A You know, I don't remember. I'd have to -- I'd have

19 to read it here because I don't remember the numbers. It

20 looks like it was four maps.

21 Q Okay. And feel free if you need a moment to review

22 this document. I'm looking at page 3, the three full

23 paragraphs here summarizing what you found.

24 A Right. Right. So this -- Yeah, this summary --

25 Yeah, so it looks like, yeah, Paul Graves created four

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1 maps.

2 Was there another question?

3 Q And how many referenced maps did you find? That is,

4 maps that the account for Paul Graves viewed.

5 A Five maps.

6 Q Okay. And then the same question for the

7 AntonGrose@Leg.Wa.Gov account, how many maps did you find,

8 created maps did you find?

9 A That account created two maps and it looks like

10 referenced two maps as well.

11 Q Okay. And the same question for the

12 AntonGrose@Yahoo.com account.

13 A So that account created 99 maps and it looks like

14 referenced 25 maps, I guess one of which no longer exists.

15 As we had sort of discussed earlier, that's how that can

16 happen.

17 Q What does that -- What does it mean again, that one

18 of which no longer exists?

19 A Yeah. So there's a map in the Shared With Me list,

20 you know, that they had viewed at some point in time, but

21 at some point in the past whoever owned that map deleted

22 it. And this is sort of, you know, long enough ago that

23 it no longer exists in our database.

24 Q I see.

25 A I guess I should clarify just one thing. You know,

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<p style="text-align: right;">Page 113</p> <p>1 there's one point I just want to make I'm not sure of; and</p> <p>2 that is I think that it probably is the case that if a</p> <p>3 user deletes the map, you know, their own map, so it's in</p> <p>4 their trash but it still exists somewhere, that a user who</p> <p>5 has a reference to that is not going to be able to see the</p> <p>6 map in their trash.</p> <p>7 In other words, so it will show up and say, you</p> <p>8 know, I can't find that map. I'm not positive about that,</p> <p>9 but I just wanted to note that for the record.</p> <p>10 Q Okay. You noted in this letter -- I'm going to</p> <p>11 direct you to paragraph -- paragraph 12 on page 2 of this</p> <p>12 exhibit.</p> <p>13 A Yes.</p> <p>14 Q You noted that you do have some revision history of</p> <p>15 maps.</p> <p>16 A Yes.</p> <p>17 Q Correct? Okay. But you haven't included those in</p> <p>18 the production. Why is that?</p> <p>19 A Well, specifically we included the IDs for the</p> <p>20 revisions but not the full maps, too. And as -- As you</p> <p>21 can see here in No. 12, we say if -- You know, if you have</p> <p>22 specific requests about some of those, we can provide</p> <p>23 them.</p> <p>24 Q Okay.</p> <p>25 A You know, basically I guess I would have to claim</p>	<p style="text-align: right;">Page 114</p> <p>1 undue burden. You know, because for maps that -- For maps</p> <p>2 that somebody actually worked on over some period of time,</p> <p>3 then there's going to be a set of revisions, you know,</p> <p>4 across those number of days that they worked on that map.</p> <p>5 So you could imagine there might be, you know, five,</p> <p>6 six, seven, eight, maybe even more in some cases revisions</p> <p>7 for a map. Now, you know, some maps that they don't work</p> <p>8 on very much, you know, you're not going to get those.</p> <p>9 But it would multiply by quite a bit the number of maps or</p> <p>10 snapshots of maps that we would have to provide, and</p> <p>11 there's not -- It's a little bit -- It's a lot more work,</p> <p>12 I guess, to get those maps. I mean, it's just with each</p> <p>13 individual one you have to go and say, you know, get the</p> <p>14 data for that map, et cetera, et cetera.</p> <p>15 So because it was my -- I guess because I think that</p> <p>16 you probably don't care about almost all of those, and so</p> <p>17 if there were a few maps where you said, "I really do want</p> <p>18 to see those revisions. You know, we're going to ask for</p> <p>19 that," that that would be a much lower burden to provide</p> <p>20 the data that way.</p> <p>21 Q So you can, in other words -- I just want to</p> <p>22 confirm. You have revision history. You have a revision</p> <p>23 history and past versions of every map that the system</p> <p>24 maintains, which we'll talk about -- I'll ask you about,</p> <p>25 you know, how many --</p>
<p style="text-align: right;">Page 115</p> <p>1 A Yes.</p> <p>2 Q -- of those maps you maintained.</p> <p>3 A Yeah.</p> <p>4 Q But you have them. You just haven't produced them</p> <p>5 in this production?</p> <p>6 A Yes, that is correct.</p> <p>7 Q Okay.</p> <p>8 A We do have a revision history. We can, yeah,</p> <p>9 describe that at a -- when you ask at a later time.</p> <p>10 Q Okay. And you produced this partial production on</p> <p>11 August 22nd in a zip file shared over email; correct?</p> <p>12 A Yes. Yes.</p> <p>13 Q And that zip file is called Archive.zip; is that</p> <p>14 right?</p> <p>15 A Yes.</p> <p>16 Q Okay. And you produced the rest of the responsive</p> <p>17 documents and data concerning the remaining eight</p> <p>18 individuals on September 9th; correct?</p> <p>19 A Yes.</p> <p>20 Q And just to make sure --</p> <p>21 A I believe so.</p> <p>22 Q -- I will mark as Exhibit 10 the letter accompanying</p> <p>23 that production.</p> <p>24 (Bradlee Exhibit No. 10 introduced and displayed.)</p> <p>25 Q Do you recognize this document, Exhibit 10, to be</p>	<p style="text-align: right;">Page 116</p> <p>1 the letter that accompanied your September 9th production?</p> <p>2 A Yes, that looks correct.</p> <p>3 Q Okay. In compiling this next production for the</p> <p>4 eight other individuals did you take any different or</p> <p>5 additional steps to search for accounts plausibly</p> <p>6 associated with the individuals that you -- than what you</p> <p>7 did for the first production?</p> <p>8 A No. I took the same steps for these individuals as</p> <p>9 I did as I described before.</p> <p>10 Q Okay. And I just want to talk through the results</p> <p>11 of your search for these eight remaining individuals as we</p> <p>12 did for the other four.</p> <p>13 And I'll just -- I'll ask you one by one sort of the</p> <p>14 accounts plausibly associated with that individual --</p> <p>15 A Um-hmm.</p> <p>16 Q -- and then also the number of created and</p> <p>17 referenced maps.</p> <p>18 So starting with Brady Piñero Walkinshaw, did you</p> <p>19 find any accounts associated with him?</p> <p>20 A No.</p> <p>21 Q Okay. And did you have -- Did you search any email</p> <p>22 addresses provided to you that are associated with that</p> <p>23 individual?</p> <p>24 A If you provided email addresses, I searched for</p> <p>25 those. And I also -- You know, as I mentioned before, so</p>

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<p>1 I would search for, you know, Walkinshaw or similar</p> <p>2 variations on that name.</p> <p>3 Q Okay.</p> <p>4 A And I didn't find anything.</p> <p>5 Q Sarah Augustine?</p> <p>6 A Same thing, did not find anything plausibly</p> <p>7 associated with her.</p> <p>8 Q What about Ali O'Neil?</p> <p>9 A Yes, there's one account there that's listed that's</p> <p>10 plausibly associated with Ms. O'Neil.</p> <p>11 Q And what is that email address account?</p> <p>12 A What is it, Amoneil5@Gmail.com, I believe.</p> <p>13 Q And how many created maps did Ms. O'Neil have?</p> <p>14 A Ninety-six created maps.</p> <p>15 Q And how many referenced maps for that account?</p> <p>16 A Just -- Just one point, I didn't mention this</p> <p>17 before. We talked about this earlier, but I just want to</p> <p>18 make the point is that that number of maps, they might</p> <p>19 have been created by scratch; or they just might have been</p> <p>20 copied or uploaded, and they might not have, you know,</p> <p>21 done anything with those copies, so -- But it's 96 total</p> <p>22 maps.</p> <p>23 Q Okay. And so just to make sure I understand what</p> <p>24 you just said. So created maps includes maps that the</p> <p>25 person created from scratch or imported or copied from</p>	<p>1 elsewhere, from elsewhere in DRA?</p> <p>2 A That's correct. And we can't tell the difference.</p> <p>3 They're all the same as far as the way they are</p> <p>4 represented in the database.</p> <p>5 Q Is the list of created maps the same list of maps</p> <p>6 shown to the user in their My Maps page?</p> <p>7 A Yes, it is. Yep.</p> <p>8 Q Okay. What about Osta Davis?</p> <p>9 A Yeah, it looks like there was one account plausibly</p> <p>10 associated with Ms. Davis, Osta at what, HDCC.org.</p> <p>11 Q How many created maps for Osta Davis's account?</p> <p>12 A It looks like 107.</p> <p>13 Q And referenced maps?</p> <p>14 A Seventy-eight, it looks like.</p> <p>15 Q And how many of those -- There are a number that --</p> <p>16 I'm sorry -- and for Ali O'Neil as well that no longer</p> <p>17 exist?</p> <p>18 A Yes. I guess Ms. O'Neil referenced 183 maps, four</p> <p>19 of which no longer exist, and Ms. Davis three of them no</p> <p>20 longer exist of those referenced maps.</p> <p>21 Q And you found an account plausibly associated with</p> <p>22 April Sims?</p> <p>23 A Yes.</p> <p>24 Q What is that account?</p> <p>25 A It's AprilMaySims@Gmail.com.</p>
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<p>1 Q And how many maps did you find that account created?</p> <p>2 A Five maps.</p> <p>3 Q And how many maps did that account reference?</p> <p>4 A Twenty-seven maps.</p> <p>5 Q And how many of those no longer exist?</p> <p>6 A It looks like they all exist.</p> <p>7 Q Okay. And Lisa McLean, you found an account</p> <p>8 associated with her. What's the email address for that</p> <p>9 account?</p> <p>10 A Yeah. So Lisa.McLean@Redistricting.Wa.Gov.</p> <p>11 Q And how many created maps for Ms. McLean?</p> <p>12 A Three maps.</p> <p>13 Q How many maps did that user reference?</p> <p>14 A None.</p> <p>15 Q And -- Okay. And for Dominique Meyers, what</p> <p>16 accounts did you find plausibly associated with her?</p> <p>17 A So one account, Dominique.Meyers@Leg.Wa.Gov.</p> <p>18 Q And how many maps were created by that user?</p> <p>19 A Maybe you want to scroll up a little bit? I --</p> <p>20 Q Sorry about that.</p> <p>21 A It looks like 87 maps.</p> <p>22 Q And how many maps were referenced by that user?</p> <p>23 A A hundred and ten maps, six of which no longer</p> <p>24 exist.</p> <p>25 Q And the last individual we asked you about was</p>	<p>1 Justin Bennett. What account was associated with that</p> <p>2 person?</p> <p>3 A Yeah, so there's an account,</p> <p>4 Justin.Bennett@Redistricting.Wa.Gov.</p> <p>5 Q How many created maps for that account?</p> <p>6 A Three maps.</p> <p>7 Q How many referenced maps for that account?</p> <p>8 A Six maps were referenced.</p> <p>9 Q Okay. All of which exist?</p> <p>10 A Yes.</p> <p>11 Q Okay. And so in total you found accounts plausibly</p> <p>12 associated with eight of the 12 individuals plaintiffs</p> <p>13 asked you about?</p> <p>14 A I guess if that's your count, I -- Yeah. I didn't</p> <p>15 count, but yes.</p> <p>16 Q All right.</p> <p>17 A Whatever it says in the document there, yep.</p> <p>18 Q So on Exhibit 9 it looks like you have one --</p> <p>19 sorry -- one, two, three, four, five, six here and then</p> <p>20 four from the initial production?</p> <p>21 A Yeah.</p> <p>22 Q Does that sound right?</p> <p>23 A Yeah, I think that's right.</p> <p>24 Q Oh, I'm sorry. Ten? No, that's not right. Now I'm</p> <p>25 not able to see that.</p>

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<p>1 A I mean, there's a couple of accounts -- the initial</p> <p>2 one had two accounts for --</p> <p>3 Q Oh, that's right.</p> <p>4 A Was it two of the -- Well, for one of the</p> <p>5 individuals, anyway. Yeah, whatever -- whatever is there</p> <p>6 I -- Yeah.</p> <p>7 Q Just to make sure I have it right because, you know,</p> <p>8 the joke is that lawyers can't do math.</p> <p>9 In the first partial production you found accounts</p> <p>10 plausibly associated with two of the individuals, and in</p> <p>11 the second production you found accounts plausibly</p> <p>12 associated with six individuals, meaning you found</p> <p>13 accounts plausibly associated with eight individuals; is</p> <p>14 that right?</p> <p>15 A Correct. That's correct.</p> <p>16 Q Okay.</p> <p>17 A Yes. Absolutely.</p> <p>18 Q That was really, really hard for me.</p> <p>19 Okay. And then so after you -- or when you produced</p> <p>20 this second production -- And I'm sorry. On September 9th</p> <p>21 when you produced this second production, you produced</p> <p>22 those documents and placed them in a -- or I'm sorry. You</p> <p>23 produced them in the same sort of zip file format --</p> <p>24 A Um-hmm.</p> <p>25 Q -- with all the files in it; correct?</p>	<p>1 A Yes. Yes. Sorry.</p> <p>2 Q Okay. And that zip file was called Archive2.zip; is</p> <p>3 that right?</p> <p>4 A Yeah, I believe so. Yes.</p> <p>5 Q And you did -- You produced this one not by email,</p> <p>6 but by putting it into a Dropbox folder provided by</p> <p>7 plaintiffs' counsel; correct?</p> <p>8 A Yes.</p> <p>9 Q Okay. And when you did that you and I had a</p> <p>10 conversation, correct, where I requested some changes to</p> <p>11 the format of the files you produced, --</p> <p>12 A Yes.</p> <p>13 Q -- to make them easier to open and make sense of in</p> <p>14 like Microsoft Excel or another readily available computer</p> <p>15 program.</p> <p>16 Do you recall that conversation?</p> <p>17 A Yes, that's correct. Yep.</p> <p>18 Q And what do you recall about our conversation?</p> <p>19 A Yeah, basically that, yeah, you were -- I mean, that</p> <p>20 you were asking for the information in an easier to digest</p> <p>21 format, essentially.</p> <p>22 And I think from our conversation, you know, I kind</p> <p>23 of -- You know, I think I had been thinking a little bit</p> <p>24 along the same lines of yeah, this is kind of hard to get</p> <p>25 through the data in a reasonable manner. And so your</p>
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<p>1 conversation helped to coalesce around producing some CSV</p> <p>2 files -- that's Comma-Separated Values files -- that can</p> <p>3 be easily uploaded into Excel just -- to make the same</p> <p>4 data, but just to make it more easily accessible.</p> <p>5 Q Okay. And do you recall when you produced -- or I</p> <p>6 will say you did produce the same data in a different</p> <p>7 format in a subsequent production.</p> <p>8 A Um-hmm. Um-hmm.</p> <p>9 Q Do you recall when that was?</p> <p>10 A I'm going to -- I'm going to have to look it up.</p> <p>11 When did I produce that?</p> <p>12 I don't know. Let's see here. Yeah, I have to -- I</p> <p>13 have to look at my -- look at my computer here to -- Yeah,</p> <p>14 I don't remember off the top of my head. It probably was</p> <p>15 in later September or maybe mid September, but let me just</p> <p>16 take a quick look here. Because I still have it all right</p> <p>17 here at my fingerprints.</p> <p>18 I believe I produced it on September 13th, 2022.</p> <p>19 Q Okay. And you did that by placing sort of a</p> <p>20 zipped -- another zipped file containing the documents</p> <p>21 into the same Dropbox folder, correct, that plaintiffs'</p> <p>22 counsel had shared with you before?</p> <p>23 A Yes, that's correct. That's correct.</p> <p>24 Q And what was that zip file called?</p> <p>25 A I believe it was called Archive-Updated.zip, and I</p>	<p>1 believe that included all the information from both the</p> <p>2 partial response and the subsequent response.</p> <p>3 Q Okay. So that --</p> <p>4 A In that new format.</p> <p>5 Q So you provided the same data for all of the eight</p> <p>6 individuals for whom you found -- or for the eight</p> <p>7 individuals for whom you found user accounts and all in</p> <p>8 the same zip file?</p> <p>9 A Yes, that's correct.</p> <p>10 Q Okay. And I'm just going to -- One moment here.</p> <p>11 I'm going to share with you on my screen a website here.</p> <p>12 (Website displayed.)</p> <p>13 Q Okay. Do you recognize the Dropbox folder I pulled</p> <p>14 up here on the share screen?</p> <p>15 A Very.</p> <p>16 Q Is this the Dropbox folder where you placed the</p> <p>17 Archive-updated.zip file?</p> <p>18 A Yes, that looks -- Yes, I believe so.</p> <p>19 Q Is the link displayed on my browser the link for the</p> <p>20 folder where you uploaded your productions?</p> <p>21 A Let's see here. You know, I can't really tell much</p> <p>22 from the link, you know, because I don't remember the key</p> <p>23 there; but it certainly looks like it, you know, with the</p> <p>24 case -- the case number. And it's got the files that I</p> <p>25 believe that I uploaded to the folder, so I'm reasonably</p>

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<p style="text-align: right;">Page 125</p> <p>1 sure that's what it is.</p> <p>2 Q Okay. And the last Archive-updated.zip was last</p> <p>3 modified 9/13, on September 13th, and that was when you</p> <p>4 uploaded the production to the Dropbox folder; correct?</p> <p>5 A Yes, that's correct.</p> <p>6 Q And do you acknowledge that I'm clicking to open the</p> <p>7 zip file Archive-updated.zip so we can both sort of see</p> <p>8 its contents?</p> <p>9 A Yes.</p> <p>10 Q And can you sort of -- I'm going to open it up, but</p> <p>11 can you sort of walk me through the contents of the files</p> <p>12 that you produced in this, in this folder?</p> <p>13 A Yeah. So essentially, you know, each archive -- So</p> <p>14 there's a Read Me that describes some of the fields that</p> <p>15 you'll find in the different files, and then there's a</p> <p>16 folder for each email account that there's some</p> <p>17 information provided.</p> <p>18 So there's that metadata, Meta.CSV, so that's that</p> <p>19 metadata about that account, which I mentioned before it</p> <p>20 has, you know, when that account was created, when it was</p> <p>21 last active, et cetera.</p> <p>22 That References.JSON is the file that would indicate</p> <p>23 for all maps created by that account, here are the other</p> <p>24 accounts who we know have referenced those individual</p> <p>25 maps. And then the two folders for the maps created by</p>	<p style="text-align: right;">Page 126</p> <p>1 this account and the maps referenced by this account.</p> <p>2 Q And in each of the created folders can you sort of</p> <p>3 explain what you provided here?</p> <p>4 A So yeah, so there's a CSV file that lists each</p> <p>5 individual map, and it has columns for, you know, all</p> <p>6 kinds of data about that map. You know, when it was</p> <p>7 created, when it was modified, other information like some</p> <p>8 of the -- A lot of different information really about the</p> <p>9 map. I mean, if you want to look we can go through the</p> <p>10 different fields.</p> <p>11 And then each of the maps has a map archive. So</p> <p>12 this .JSON file for a particular map is an archive of that</p> <p>13 map that could be loaded back. So if you wanted to look</p> <p>14 at the map, and we can be sure that this is the map as it</p> <p>15 existed when I created this archive, when I pulled that</p> <p>16 data from the database, then, you know, you could load it.</p> <p>17 And any one of you plaintiffs or defendants could load</p> <p>18 that and look at the map in the app.</p> <p>19 Q Okay. And the referenced folder?</p> <p>20 A Same -- same thing. So the information, the CSV is</p> <p>21 the same information about each of the maps that was</p> <p>22 referenced, you know, in that Shared With Me for that</p> <p>23 account, and then plus the archives of those maps as well.</p> <p>24 Q Okay. Thank you for walking through that.</p> <p>25 A Sure.</p>
<p style="text-align: right;">Page 127</p> <p>1 Q The last sort of thing I want to ask you about is</p> <p>2 going through some of the metadata fields for the</p> <p>3 information that you produced.</p> <p>4 A Sure.</p> <p>5 Q And I'm going to do that -- Well, let me mark as</p> <p>6 Exhibit 10 -- I'm sorry, Exhibit 11 the Read Me file that</p> <p>7 you produced, which I'll put here.</p> <p>8 (Bradlee Exhibit No. 11 introduced and displayed.)</p> <p>9 Q Is this legible to you on the screen, Exhibit 11?</p> <p>10 A Yes.</p> <p>11 Q Okay. And let me also share that in the chat.</p> <p>12 Okay. And have you seen this document before?</p> <p>13 A Yes.</p> <p>14 Q Did you create this document?</p> <p>15 A Yes, I did.</p> <p>16 Q And do you recognize this document to be the Read Me</p> <p>17 file that you produced with your September 13th</p> <p>18 production?</p> <p>19 A Yes, it does look like that.</p> <p>20 Q Okay. And what does a Read Me file tell you?</p> <p>21 A Well, this particular one, it just describes some of</p> <p>22 the fields in the different files, the metadata files, CSV</p> <p>23 for the account, the CSV files for the created and</p> <p>24 referenced maps, and then just a note about the references</p> <p>25 map, References.text.</p>	<p style="text-align: right;">Page 128</p> <p>1 Q Let's just talk through -- I just have some</p> <p>2 questions about some of the metadata fields in these</p> <p>3 documents.</p> <p>4 A Um-hmm. Um-hmm.</p> <p>5 Q So at around I think the -- I'm not sure -- the</p> <p>6 fourth line down you describe the metadata associated,</p> <p>7 contained in the Meta.CSV files.</p> <p>8 A Yes. Yes.</p> <p>9 Q And that's the metadata associated with each</p> <p>10 identified user account?</p> <p>11 A That -- Yes.</p> <p>12 Q Okay. And I just want to confirm that so the ID</p> <p>13 field, that's the user -- user's GUID; is that right?</p> <p>14 A Yeah. Yes, that's right.</p> <p>15 Q And what is that?</p> <p>16 A Yeah, GUID, it's a Globally Unique Identifier, so</p> <p>17 it's one of those long strings of characters you see. So</p> <p>18 that's just how we -- That's how we ID this account.</p> <p>19 Q Okay. And when you --</p> <p>20 A So internally the database, that refers to that</p> <p>21 account.</p> <p>22 Q Got it. And the last active field, what is that?</p> <p>23 A Yeah, so that's the time that the user last logged</p> <p>24 in or last was logged into the account, more specifically.</p> <p>25 Q Okay. And in your production that will provide the</p>

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<p style="text-align: right;">Page 129</p> <p>1 last time the user was logged in prior to the date that</p> <p>2 you produced these documents; correct? So --</p> <p>3 A Yes, that's correct. That's correct.</p> <p>4 Q -- as of -- The last time they logged in as of</p> <p>5 September 13th?</p> <p>6 A Yes. I mean, for some of the accounts the</p> <p>7 underlying information -- Well, yeah, September 13. I</p> <p>8 mean, it might have been a couple days before that, so --</p> <p>9 But roughly September 13th, yes.</p> <p>10 Q As of the date that you pulled these records from</p> <p>11 the database?</p> <p>12 A That's correct, yeah.</p> <p>13 Q Okay. And then verified, I think we had talked</p> <p>14 about this earlier in the deposition, email verification.</p> <p>15 That field, it just says whether the user verified their</p> <p>16 email address?</p> <p>17 A That's correct, yeah.</p> <p>18 Q Okay. And they would have only been asked to do</p> <p>19 that if they decided to publish a map; correct?</p> <p>20 A Yeah, publish a map or use the feedback button, to</p> <p>21 email us basically through feedback.</p> <p>22 Q And the next section explains the fields contained</p> <p>23 in the CSV?</p> <p>24 A I should just -- I should just mention on the</p> <p>25 verified thing, you know, going back in time we didn't</p>	<p style="text-align: right;">Page 130</p> <p>1 used to require verification even if they published a map.</p> <p>2 I don't --</p> <p>3 I don't know exactly when we sort of started</p> <p>4 requiring the verification for that, but it was probably</p> <p>5 in 2022, so just some -- spring of 2022.</p> <p>6 If you needed that time, I would have to go and find</p> <p>7 that information.</p> <p>8 Q Okay. So the next section of the Read Me describes</p> <p>9 the metadata fields contained in the CreatedMaps.CSV and</p> <p>10 the ReferencedMaps.CSV files; correct?</p> <p>11 A That's correct.</p> <p>12 Q And like you said, for each user there's a</p> <p>13 CreatedMaps.CSV, and there's a ReferencedMaps.CSV file?</p> <p>14 A Yes.</p> <p>15 Q Do you need to get -- Do you need to grab some</p> <p>16 water? We can take a break if you need to.</p> <p>17 A I'm -- I'm -- I can go for a little while longer.</p> <p>18 Q Okay. I don't have too many questions left. I'm</p> <p>19 getting toward the end of my questions.</p> <p>20 A I know sometimes I clear my throat a lot, but that's</p> <p>21 just me.</p> <p>22 Q I just wanted to make sure.</p> <p>23 So both these files, the CreatedMaps.CSV and the</p> <p>24 ReferencedMaps.CSV, they both have the same metadata</p> <p>25 fields; is that right?</p>
<p style="text-align: right;">Page 131</p> <p>1 A Yes.</p> <p>2 Q And those are the fields described in this Read Me</p> <p>3 file?</p> <p>4 A Yes.</p> <p>5 Q Okay. I'll just note for the last two fields, the</p> <p>6 planscore_URL and planscore_index_URL, it says if</p> <p>7 available. Does that mean some of the accounts don't</p> <p>8 include these two fields?</p> <p>9 A Or they're -- Yeah, either they're not included or</p> <p>10 they're just blank.</p> <p>11 Q Okay.</p> <p>12 A Yeah.</p> <p>13 Q I just --</p> <p>14 A I --</p> <p>15 Q -- want to walk -- Oh, sorry, go ahead.</p> <p>16 A Well, I was going to say I believe that those are</p> <p>17 only going to be populated, those fields, if the user</p> <p>18 explicitly went to the planscore app, which is another app</p> <p>19 that does some scoring of a map, a plan.</p> <p>20 Q Okay. I have some questions about some of these,</p> <p>21 just a handful of these fields, and I'm going to actually</p> <p>22 open up a copy of one of these that we can both look at it</p> <p>23 together.</p> <p>24 A Okay.</p> <p>25 Q Just in case it's a little easier to talk about it</p>	<p style="text-align: right;">Page 132</p> <p>1 that way.</p> <p>2 (Document displayed.)</p> <p>3 Q So I've opened up the AMONeil5-Created-Maps.CSV, --</p> <p>4 A Um-hmm.</p> <p>5 Q -- just as a sample here. Do you see that?</p> <p>6 A Yes.</p> <p>7 Q Okay. So in the -- You provide for each of the maps</p> <p>8 a column that says URL?</p> <p>9 A Yes.</p> <p>10 Q That is the share link for this map?</p> <p>11 A Yes. That's the view-only share link for the map.</p> <p>12 Q Okay. And if you click it, it will take you to --</p> <p>13 it will take you to this map; correct?</p> <p>14 A It will open that map, yes, in the app.</p> <p>15 Q And it also tells you who the map was created by;</p> <p>16 correct?</p> <p>17 A Yes, it gives you -- Yeah. So that would be the</p> <p>18 user ID for the person who created it or the account that</p> <p>19 created it.</p> <p>20 Q Okay. And then another field in this document or in</p> <p>21 all of these CSV files is the create time?</p> <p>22 A Yes.</p> <p>23 Q So is create time pretty self-explanatory, it's the</p> <p>24 time and date when the map was created by this user;</p> <p>25 correct?</p>

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1 A That's right. Yeah, that's a timestamp we call it.  
 2 Yeah.  
 3 Q You also provide in the modified time field a  
 4 timestamp for what the Read Me file describes as the date  
 5 or time last modified.  
 6 Can you say more about what actions a user takes on  
 7 a map that --  
 8 A Yes.  
 9 Q -- qualifies --  
 10 A So -- Yes.  
 11 Q -- as a modification?  
 12 A So right. So when a map is opened, you know, if  
 13 your -- If the user is sitting there and doesn't do  
 14 anything, it's not modified.  
 15 It could be modified either by changing the map  
 16 itself. In other words, changing precincts, but it also  
 17 could be modified by changing some of the map-specific  
 18 settings, so that includes -- could include some of the  
 19 things that we -- that you walked through before,  
 20 including precinct lines or county lines. Just, you know,  
 21 viewing those, that's a modification because that's  
 22 something we're going to remember with the map for the  
 23 next time it's viewed.  
 24 Q Okay. So maybe -- So some of the things -- Some of  
 25 the ways we talked about a user can make a map or modify a

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1 map, let me just run through maybe a list --  
 2 A Um-hmm. Um-hmm.  
 3 Q -- of things that a user can do that -- and tell me  
 4 whether it will -- whether Dave's will timestamp it as  
 5 modified for that.  
 6 A Right.  
 7 Q So if the user changes any districts or reassigns  
 8 precincts or blocks?  
 9 A Yep. Yes, that's modified. Yep.  
 10 Q Okay. And if the user locks or unlocks a district  
 11 for the purposes of editing, does that trigger or modify a  
 12 timestamp?  
 13 A Yes, I believe that will modify. Yeah.  
 14 Q And then if they -- If a user sort of turns on or  
 15 off any of the map layers in the sort of left-hand panel,  
 16 the colors panel and the overlays panel and the custom  
 17 overlays panel, does that trigger a modification  
 18 timestamp?  
 19 A Yes, it does.  
 20 Q Okay. And then turning any of the display panels  
 21 data on or off, or changing the data that's displayed  
 22 there, does that also trigger a modified timestamp?  
 23 A So changing the data that's displayed there would be  
 24 a modify, but changing whether the panel shows up itself  
 25 would not be; and it's just because that setting is not

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1 specific to the map. It's specific to the user, right,  
 2 so --  
 3 So in other words, like if you just hide the right  
 4 panel, that's not going to be a map change, but pretty  
 5 much all -- everything else is a map change.  
 6 Does that make sense?  
 7 Q Can I -- I think so, but can we take a look at a map  
 8 example so I understand?  
 9 A You're going to -- You're going to prove me wrong,  
 10 and that's certainly possible, you know; but I believe --  
 11 Q Well, I actually --  
 12 A -- that is the case, so --  
 13 Q Okay. So just to make sure, so you -- So if a user  
 14 changes what data is displayed in this precinct details  
 15 and district details, like if they add a dataset or an  
 16 election to view or take one away, that triggers a  
 17 modification; correct?  
 18 A Yes, because that's associated with the map itself.  
 19 Yeah.  
 20 Q Okay. And -- Oh, I see. If a user like hides data  
 21 like by clicking, just removing it from their view, --  
 22 A Yeah.  
 23 Q -- does that trigger a modification?  
 24 A I believe it does not. That's what I was, yeah,  
 25 saying. I believe that one does not.

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1 Q Okay. And when I was tinkering around with this, on  
 2 the bottom right of the map itself I noticed that when you  
 3 change something it says map modified --  
 4 A Yes.  
 5 Q -- and then map saved to server.  
 6 A Yes.  
 7 Q So for some of these modifications if I -- Well, I  
 8 don't -- Let me take an example. Let's say I changed the  
 9 data displayed on these details --  
 10 A Right.  
 11 Q -- and apply that. Well, it should tell you -- I  
 12 guess does it -- It tells you --  
 13 Basically when a user takes an action on a map it  
 14 tells the user that the map has been modified in the  
 15 bottom right; correct?  
 16 A Yes, for -- Yeah, for a short period of time.  
 17 It's -- Yes.  
 18 And really, you know, that's more of an indicator  
 19 because sometimes a user might have a lag with the server,  
 20 you know, because of the internet or whatever, and so it  
 21 might -- If it sticks there and says oh, map modified, you  
 22 know, you as a user know that there's some changes that  
 23 are here on your computer, but they have not yet been  
 24 saved back to the server. So that's more of an indicator  
 25 there.

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1 But you're correct in that if you see that, say map  
 2 modified, then it's map saved to server, that means the  
 3 map -- that timestamp map, you know, modified time, is  
 4 going to change for this map.  
 5 Q Okay.  
 6 A Yeah.  
 7 Q And so going back to just this example that we're  
 8 looking at, the modified time, is it accurate to say that  
 9 it indicates -- Well, let me put it differently. Let me  
 10 reask the question.  
 11 So if I click the link to this first map, I'm seeing  
 12 it as it was, as it existed when it was last modified;  
 13 correct, as indicated here?  
 14 A If you click that URL?  
 15 Q Yes.  
 16 A Well, that -- Well, no, that's not necessarily true.  
 17 Q Oh, I see. Okay. So if I click this link it will  
 18 show me the map as it was last modified, but I guess the  
 19 modified time listed here in your production is the last  
 20 time it was modified as of the time that you pulled the  
 21 data for the production?  
 22 A Yeah, exactly. Exactly, that's correct.  
 23 Q Okay.  
 24 A So probably, you know, if these maps haven't -- you  
 25 know, nobody has touched them since 2021, November of

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1 2021, then it would show you that; but it is possible that  
 2 somebody, you know, the owner of this map could have  
 3 modified it, you know, since September 13th, and that link  
 4 would take you to the latest modification.  
 5 Q Okay. And the latest modification --  
 6 A And --  
 7 Q Oh, go ahead.  
 8 A Yeah. I mean, I guess -- So maybe I should just  
 9 explain here for the record. We can't -- You know, users  
 10 own these maps. We can't prevent them from continuing to  
 11 work on their maps, you know, even though we're in this  
 12 litigation state.  
 13 Now, what we've done is we've taken a snapshot, you  
 14 know, of the state of the world when this information was  
 15 subpoenaed. Now, in order to kind of get around the  
 16 problem, if it does exist, that a map could change after  
 17 this, you know, this snapshot was taken, we've created  
 18 that archive.  
 19 So you can see that archive column says Map4.JSON,  
 20 so that's -- You know, we provided you with Map4.JSON, so  
 21 that is an exact representation of the map at the time  
 22 that this data was pulled. So just in case somebody  
 23 changes it later on, you know, you do have a correct  
 24 snapshot at the time.  
 25 You know, if somebody -- You know, in theory if

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1 somebody went and erased their map or something like that,  
 2 well, you have -- you have a snapshot of the map as it was  
 3 when you asked for the data.  
 4 Q Okay. So when you last pulled -- When you produced  
 5 this -- When you made this production and pulled the data  
 6 from the database in September, --  
 7 A Yeah.  
 8 Q -- we have the most current information as of that  
 9 time?  
 10 A Yes.  
 11 Q If I click this link, it will -- If the user has  
 12 maybe modified the map since September, --  
 13 A Right.  
 14 Q -- it will tell me that.  
 15 Now, I think --  
 16 A Right. When you --  
 17 Q Let me just confirm.  
 18 A You wouldn't -- You as a viewer of that map wouldn't  
 19 be able to know per se because we don't -- Well, yeah.  
 20 Q So I wanted to ask about that.  
 21 A That's a -- That's a -- That's a good question.  
 22 Q So the --  
 23 A Sorry. You might be able to know. I'm not sure.  
 24 We could -- We could test that out, but you might be able  
 25 to know whether it's been modified or not.

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1 Q Well, so maybe can we take a look at what happens  
 2 when I take one of these links and open it here?  
 3 A Yes. Sure. Yep.  
 4 Q Just as an example I'm going to take the URL from  
 5 this first map produced by Ms. O'Neil called Copy of SDC  
 6 CD map, and then I'm copying and pasting it into the  
 7 browser.  
 8 A Yes. So --  
 9 Q And I see -- Do you see the map here, the link that  
 10 I've copied and pasted?  
 11 A Yes. Yes.  
 12 Q Okay. And I'm just going to -- This map, because  
 13 I've now looked at it, will appear in this account that  
 14 I'm logged into, it will appear --  
 15 A In your Shared With Me, yes. Yes.  
 16 Q Okay.  
 17 A But see, you -- Yeah. Yes.  
 18 Q So if I go to Shared With Me, it will tell me the  
 19 last time this map was modified?  
 20 A Right. It looks like November "8th" -- Yes. So  
 21 that's correct. So you can tell. You can tell.  
 22 Q Okay.  
 23 A And yeah, I just was looking here on my computer  
 24 here, and -- Yeah. Sorry for that. I was thinking that  
 25 you might not be able to tell, but then I did remember

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<p style="text-align: right;">Page 141</p> <p>1 that yes, this is how you could tell because you can see</p> <p>2 the last modified date in that Shared With Me. Yeah.</p> <p>3 Sorry.</p> <p>4 Q Okay. No worries. It's helpful to clarify these</p> <p>5 things. Okay.</p> <p>6 All right. So the last active field, the Read Me</p> <p>7 says that the last active field was the date and time when</p> <p>8 the last map was last viewed; correct?</p> <p>9 A Yes. And that's actually -- That's not precisely</p> <p>10 correct. You know, I've since gotten more information</p> <p>11 from my colleague that's a more precise answer to</p> <p>12 what that -- what that field is.</p> <p>13 Q What is -- What is the difference between last</p> <p>14 active and last modified? Or I'm sorry. What is the last</p> <p>15 active field?</p> <p>16 A Yeah, so last active from -- This is from my</p> <p>17 colleague who really kind of knows the server stuff a lot</p> <p>18 better. So that's where we -- We're pretty sure -- We're</p> <p>19 pretty sure that that means the last time the map was --</p> <p>20 the map itself was changed. In other words, precincts</p> <p>21 changed or blocks changed in the map; right?</p> <p>22 So it's -- It's not as sensitive as the modified</p> <p>23 time; right? Modified time is more sensitive to these</p> <p>24 kind of view options that are associated with the map,</p> <p>25 whereas last active is going to be okay, the actual</p>	<p style="text-align: right;">Page 142</p> <p>1 contents of the map changed.</p> <p>2 It could include that the primary datasets changed,</p> <p>3 okay, because those have a pretty significant effect</p> <p>4 because they affect all the statistics and the analytics</p> <p>5 as well; but none of those other view changes will affect</p> <p>6 the last active. Okay?</p> <p>7 Q Okay. And then the archive field, the name of the</p> <p>8 map Archive File, that's referring to the files in the</p> <p>9 folder snapshots at the time that you produced --</p> <p>10 A Yep.</p> <p>11 Q -- these things?</p> <p>12 A Yeah, exactly. That's correct. That's correct.</p> <p>13 Q Okay. So that field provides the name, the file</p> <p>14 name for the snapshot that you've provided?</p> <p>15 A Correct.</p> <p>16 Q Okay. The last field that I want to talk about is</p> <p>17 revisions; and we talked about this a bit before, but the</p> <p>18 revisions field --</p> <p>19 Well, can you tell me what I'm looking at under the</p> <p>20 revisions field in these files?</p> <p>21 A Sure. Now, I mean, if you pull that open a little</p> <p>22 more I think everyone can see it maybe a little bit</p> <p>23 better. If you like pull --</p> <p>24 Can you just pull that column wider?</p> <p>25 Q Oh. Well, let's see. Can I?</p>
<p style="text-align: right;">Page 143</p> <p>1 A I don't know.</p> <p>2 Q No, I don't think I can do that in this view.</p> <p>3 A See, you should be using Excel instead of that</p> <p>4 crummy, you know, Google shapes. Sorry.</p> <p>5 Just joking for any Google fans. I mean Google</p> <p>6 whatever. You know, I used to work at Microsoft, so I'm</p> <p>7 just, yeah, making a joke.</p> <p>8 Q Oh, I see. I get it.</p> <p>9 Are you able to -- Are you able to see sort of the</p> <p>10 data provided in this, in the revisions column?</p> <p>11 A Yeah. I mean, I can. I kind of know what I'm</p> <p>12 looking at, so -- But if there's anyone else who is</p> <p>13 looking, that might be a little bit challenging.</p> <p>14 So essentially, you know, this is a chunk of JSON.</p> <p>15 So it's a string that's in the JSON format. That's the</p> <p>16 JavaScript Object Notation, which is -- It's sort of a key</p> <p>17 value form.</p> <p>18 So you can kind of see here there's a key called ID,</p> <p>19 and then there's one of those long IDs that is in quotes.</p> <p>20 You know, the first one what, is 0D, blah, blah, blah,</p> <p>21 blah, blah, you know, CE. So that's the ID of the</p> <p>22 revision. So in other words, of that snapshot of this map</p> <p>23 that exists in our database. And then it gives you a</p> <p>24 timestamp of when that revision was created.</p> <p>25 And then the label, the user can actually label</p>	<p style="text-align: right;">Page 144</p> <p>1 their revisions if they want to. Most don't, but --</p> <p>2 Because we kind of create these revisions periodically,</p> <p>3 you know, really behind the scenes. I mean, it's not --</p> <p>4 Well, we know when it's created, but the user</p> <p>5 doesn't really kind of think about them.</p> <p>6 Q Okay. And so let me see if I can distill that.</p> <p>7 Is it accurate to say that this field tells you for</p> <p>8 each snapshot that DRA has in the revision history for</p> <p>9 this map --</p> <p>10 A Um-hmm.</p> <p>11 Q -- a number of pieces of information about it;</p> <p>12 right?</p> <p>13 A Yep.</p> <p>14 Q About each snapshot. And it seems like the pieces</p> <p>15 of information about each snapshot that you're providing</p> <p>16 here is, like you said, the ID; is that right?</p> <p>17 A Yep. Yes.</p> <p>18 Q And then the modified time, and that's the same sort</p> <p>19 of the modified time that we were speaking about before?</p> <p>20 A Yes.</p> <p>21 Q Okay. And then it also provides the label if the</p> <p>22 user applied a label to the map?</p> <p>23 A Yes.</p> <p>24 Q Okay. And you -- Like we were discussing before,</p> <p>25 you haven't produced each of these individual maps that</p>

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<p style="text-align: right;">Page 145</p> <p>1 you've identified in the revision history for each map</p> <p>2 here; is that right?</p> <p>3 A Yes, that's correct.</p> <p>4 Q Okay.</p> <p>5 A That's correct.</p> <p>6 Q How -- Can you explain a little how often -- how</p> <p>7 often is a snapshot taken of a map that appears in a map's</p> <p>8 revision history?</p> <p>9 A Yeah, so -- Yeah, it's not in the Read Me here.</p> <p>10 It's something that my colleague gave me a little more</p> <p>11 clarification on after I made that file.</p> <p>12 Yeah, so essentially what happens is that whenever a</p> <p>13 map is opened -- and it could be by, you know, the owner</p> <p>14 or a user that had edit permissions, either one -- when</p> <p>15 that map is opened will -- on the server will take a</p> <p>16 snapshot, unless there was a snapshot already taken and</p> <p>17 nothing -- nothing changed. Nothing has changed since</p> <p>18 that last snapshot was taken.</p> <p>19 So in other words, if a user, you know, works on a</p> <p>20 map, you know, made some changes, and they go home and --</p> <p>21 or they, you know, they're done for the day, and they come</p> <p>22 back the next day and they open up a new session and they</p> <p>23 open that map again, it will take a snapshot of the work</p> <p>24 from the previous day. And then they make some more</p> <p>25 changes, et cetera, then they leave, we haven't taken a</p>	<p style="text-align: right;">Page 146</p> <p>1 second snapshot yet. But then they come back a third day,</p> <p>2 open the map again, we're going to take that other -- that</p> <p>3 next snapshot that captures the work in another session.</p> <p>4 Now, they might, you know, leave their computer on</p> <p>5 and leave the session open with that map in it for a</p> <p>6 couple of days. That's probably still the same session.</p> <p>7 You know, in other words, there won't be any snapshot</p> <p>8 taken in the middle of that time.</p> <p>9 Q Okay. Okay. Is it accurate -- To make sure I</p> <p>10 understand, so you're taking one snapshot per session;</p> <p>11 right?</p> <p>12 A Yep.</p> <p>13 Q And that session is however long the person has had</p> <p>14 their browser open from -- I guess at one sitting. Or I</p> <p>15 guess when they open their browser until when they close</p> <p>16 the browser or log out?</p> <p>17 A With that particular map open. I think that's --</p> <p>18 Q Oh, I see.</p> <p>19 A So in other words, if they go and they work on a</p> <p>20 different map, we'll forget about the first map being</p> <p>21 opened, so that -- And they come back to it, I think that</p> <p>22 might be a different snapshot.</p> <p>23 Q Okay.</p> <p>24 A Okay.</p> <p>25 Q So you'll preserve a copy of the map once per</p>
<p style="text-align: right;">Page 147</p> <p>1 session, and -- each unique copy of the map, basically,</p> <p>2 once per session, like at the end of the -- What am I</p> <p>3 trying to say.</p> <p>4 Is the snapshot -- The snapshot is taken basically</p> <p>5 at the end of the session when the person has made changes</p> <p>6 to a map; is that right?</p> <p>7 A In effect that's right, yes.</p> <p>8 Q Okay.</p> <p>9 A Yes. And just a note there is that if it happens</p> <p>10 that two or more people are working on the same map, the</p> <p>11 snapshot business, it doesn't know about the multiple</p> <p>12 users. It's just -- You know, there's only just --</p> <p>13 The map is in the server memory; and it really is</p> <p>14 like as long as that stays in the server memory, we're not</p> <p>15 going to take a snapshot. It's only when oh, nobody is</p> <p>16 looking at it. It's not in the server memory anymore.</p> <p>17 Somebody is looking at it again, now it's back in the</p> <p>18 server memory, we take a snapshot.</p> <p>19 Q Okay.</p> <p>20 A So in other words, there's not -- Yeah, with</p> <p>21 multiple users there's not going to be snapshots based on</p> <p>22 the different clients, different client computers for</p> <p>23 those different users.</p> <p>24 Q Regardless of who is working on the map, basically</p> <p>25 just every time it's modified within a session you take a</p>	<p style="text-align: right;">Page 148</p> <p>1 snapshot of it, and you have a copy of that map?</p> <p>2 A Well, every time -- or like the session is</p> <p>3 completely done, with however many users there were,</p> <p>4 there's going to be a snapshot the next time somebody</p> <p>5 opens that map.</p> <p>6 Q Okay.</p> <p>7 A So -- I know it's a little bit --</p> <p>8 Q I think I understand.</p> <p>9 A -- complicated, but that's -- That's how my</p> <p>10 colleague has explained it, which makes sense to me.</p> <p>11 I mean, it's from understanding -- You know, for me</p> <p>12 I understand how kind of the server works in our app and</p> <p>13 how the client works, so that's -- It's all -- All the</p> <p>14 snapshot stuff happens, you know, on the server, which</p> <p>15 means like, you know, on a computer running in AWS, not</p> <p>16 on, you know, the computer that the user is using; right?</p> <p>17 When we say the client, that means, you know, I'm</p> <p>18 here on my laptop, and I'm working on a map, it's -- it's</p> <p>19 running on my laptop. Stuff that's happening on my laptop</p> <p>20 as I'm changing it, that's the client.</p> <p>21 Q Okay. I think I just have like one more question</p> <p>22 about the metadata.</p> <p>23 And actually, can you hear me okay?</p> <p>24 A Yes, I can.</p> <p>25 Q I think you may have frozen for me.</p>

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<p style="text-align: right;">Page 149</p> <p>1 A Oh.</p> <p>2 Q I just want to make sure.</p> <p>3 MR. MULJI: Jeanne, can you hear me okay?</p> <p>4 THE REPORTER: I can hear you just fine,</p> <p>5 and you're not frozen for me.</p> <p>6 MR. MULJI: Oh, okay. All right. I think</p> <p>7 you all appear a little choppy for me, but if you can hear</p> <p>8 me, then we'll continue.</p> <p>9 Q (By Mr. Mulji) So the final section of the Read Me</p> <p>10 file describes what's in the References.Text file</p> <p>11 associated with each user; correct?</p> <p>12 A Yes.</p> <p>13 Q And that, like you said, is just a list of all the</p> <p>14 maps created by the user and a list of all the people,</p> <p>15 other users who have viewed their maps; correct?</p> <p>16 A Who have viewed their maps, that's correct.</p> <p>17 Q Okay. And what information did you provide about</p> <p>18 those users who viewed the maps?</p> <p>19 A I guess just the email of that user of that account,</p> <p>20 email and the name of the account.</p> <p>21 MR. MULJI: Okay. I'm just going to take a</p> <p>22 very quick like three-minute break, but I think I'm</p> <p>23 basically done with my questions. I'm just going to take</p> <p>24 a quick break to make sure.</p> <p>25 Can we come back here at like 2:23?</p>	<p style="text-align: right;">Page 150</p> <p>1 THE WITNESS: Yes. Yep.</p> <p>2 MR. MULJI: Okay.</p> <p>3 THE WITNESS: I can get a drink of water.</p> <p>4 That would be great.</p> <p>5 MR. MULJI: Thanks.</p> <p>6 THE WITNESS: Thank you.</p> <p>7 (Break 2:20 p.m. to 2:25 p.m.)</p> <p>8 MR. MULJI: We can go back on the record.</p> <p>9 Oh, actually, I actually don't know if Dave is back.</p> <p>10 Oh, you are back.</p> <p>11 THE WITNESS: Okay. Sorry.</p> <p>12 MR. MULJI: No worries. Sorry. I tried to</p> <p>13 get started without you. So we're back on the record.</p> <p>14 Dave, I very much appreciate your time today. I</p> <p>15 know you all are an all-volunteer team doing a passion</p> <p>16 project here, so I appreciate your time today. And that's</p> <p>17 all the questions that I have.</p> <p>18 Before we -- I think some of the other parties in</p> <p>19 the case have some questions for you, but before I turn it</p> <p>20 over I actually am going to request -- I'm having some lag</p> <p>21 issues and audio issues. I'm going to try to just like</p> <p>22 leave and come back real quick. I'll be right back, just</p> <p>23 to see if that helps.</p> <p>24 THE WITNESS: Okay.</p> <p>25 (Pause in proceedings.)</p>
<p style="text-align: right;">Page 151</p> <p>1 MR. MULJI: All right. I'm back, and</p> <p>2 hopefully that will be better; but if it's not and I can't</p> <p>3 hear you well, I'll let you know.</p> <p>4 I'll turn it over to whoever wants to go next.</p> <p>5 MR. HUGHES: No questions from the State.</p> <p>6 Thanks.</p> <p>7 MR. HOLT: The intervenor-defendants just</p> <p>8 have a few questions.</p> <p>9 Everyone okay if I proceed?</p> <p>10 MR. MULJI: Yes.</p> <p>11 MR. HOLT: Awesome.</p> <p>12 EXAMINATION</p> <p>13 BY MR. HOLT:</p> <p>14 Q Dave, my name is Dallin Holt. I am an attorney</p> <p>15 that represents the intervenor-defendants in the Palmer</p> <p>16 litigation.</p> <p>17 And I just wanted to follow up on a few questions</p> <p>18 regarding the demographic data that you talked about with</p> <p>19 plaintiffs' counsel a few hours ago. There's no specific</p> <p>20 map in particular that I'm referring to. I just more want</p> <p>21 to talk about how you classify the different racial</p> <p>22 categories in your maps.</p> <p>23 And I'm looking at Plaintiffs' Exhibit 3, for</p> <p>24 example. I don't -- I don't have all the maps and</p> <p>25 everything that was shared with me, but I'll represent on</p>	<p style="text-align: right;">Page 152</p> <p>1 the side that goes down it says total, white, Hispanic,</p> <p>2 Black, Asian, Native and Pacific.</p> <p>3 Does that sound about right?</p> <p>4 A Yes. Yes.</p> <p>5 Q Okay. What do you understand is the term Hispanic</p> <p>6 when used as a race and an ethnicity, and how did you use</p> <p>7 it here?</p> <p>8 So I guess the first question would be what do you</p> <p>9 understand about the term Hispanic in terms of race and</p> <p>10 ethnicity?</p> <p>11 MR. MULJI: Object to form.</p> <p>12 A Sorry. What was -- So what was -- Did you --</p> <p>13 Q (By Mr. Holt) Yeah, in terms of Hispanic --</p> <p>14 And there might be some objections to form and</p> <p>15 whatnot, but you can still proceed and answer those</p> <p>16 questions unless your attorney specifically tells you not</p> <p>17 to.</p> <p>18 But my question was when I'm pulling up the</p> <p>19 different race categories in a particular district or</p> <p>20 precinct or county or whatever, --</p> <p>21 A Um-hmm. Um-hmm.</p> <p>22 Q -- and I -- and it has a Hispanic percentage there,</p> <p>23 --</p> <p>24 A Right.</p> <p>25 Q -- I'm trying to understand exactly what is</p>

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<p>1 encompassed within that Hispanic number and what is not.</p> <p>2 So I'm going to -- I guess I can just --</p> <p>3 A Right. Right.</p> <p>4 Q -- ask a few --</p> <p>5 A Yeah.</p> <p>6 Q -- specific questions that will help kind of flesh</p> <p>7 that out a little bit.</p> <p>8 Are you familiar with --</p> <p>9 A Yeah. Yeah.</p> <p>10 Q -- the term DOJ Black?</p> <p>11 A I've heard the term, but I'm not sure which -- which</p> <p>12 category it refers to exactly.</p> <p>13 Q Okay.</p> <p>14 A But I --</p> <p>15 Q Now, if I reference --</p> <p>16 A Well, I mean, --</p> <p>17 Q -- make a reference to you --</p> <p>18 A Yep.</p> <p>19 Q Sorry. Go ahead.</p> <p>20 A Well, I was going to say I can describe what the</p> <p>21 numbers are that you're seeing there and kind of -- and</p> <p>22 where I got those numbers, if that's what you would like</p> <p>23 me to do.</p> <p>24 Q That would be helpful. Thank you.</p> <p>25 A Right. So on -- So most of -- Most of the datasets</p>	<p>1 that we have for the demographics -- that's total</p> <p>2 population, voting age population, citizen voting age</p> <p>3 population -- when we list the term Hispanic, it means all</p> <p>4 Hispanics regardless of race.</p> <p>5 Now, that number -- So except for the, you know,</p> <p>6 American Community Survey and citizen voting age</p> <p>7 population data -- for the regular census data, you know,</p> <p>8 that number comes directly from a field in the census</p> <p>9 data, you know, at the block level.</p> <p>10 So, you know -- So in other words, the census</p> <p>11 produces these tables; and they have a field that</p> <p>12 specifically says this is all Hispanics regardless of</p> <p>13 race, and so that's the number we have for that category.</p> <p>14 Q Okay. So --</p> <p>15 A For -- I was just going to say to clarify, for the</p> <p>16 ACS data or the citizen voting age population it's the</p> <p>17 same thing, but we had to in some cases calculate that. I</p> <p>18 don't remember exactly. I think they might not have</p> <p>19 presented the number. Well, I think for Hispanics, I</p> <p>20 think they presented the number the same way.</p> <p>21 I think for some of the race combination groups for</p> <p>22 the ACS they don't produce the numbers in exactly the same</p> <p>23 way.</p> <p>24 Q Okay. So if somebody represented that they were a</p> <p>25 Black Hispanic, --</p>
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<p>1 A Um-hmm.</p> <p>2 Q -- would that information be included as a tally in</p> <p>3 the Hispanic and the Black categories, or would it be one</p> <p>4 or the other?</p> <p>5 A Yes, it would be in both categories. And, you know,</p> <p>6 the only exception is we do have that other dataset that's</p> <p>7 the -- you know, VAP, the NH VAP, so that's -- And that is</p> <p>8 again coming from the census. We put that in there</p> <p>9 because, you know, people requested it in terms of looking</p> <p>10 at the demographics a different way.</p> <p>11 They're -- You know, Hispanic is all Hispanics</p> <p>12 regardless of race, but Black in that, in that dataset is</p> <p>13 Black alone, not Hispanic.</p> <p>14 Q Okay. So if an individual was Black and white --</p> <p>15 A Um-hmm.</p> <p>16 Q -- in the race categories, would they appear in the</p> <p>17 Black only category?</p> <p>18 A No, they would appear in both, right, because it's</p> <p>19 Black alone or in combination with other races.</p> <p>20 So if they put two races on their census form, they</p> <p>21 would -- Black and white, they would be counted in that</p> <p>22 Black combination group. And that's as the census, you</p> <p>23 know, they define that term.</p> <p>24 Q Okay. And do you know how the Washington</p> <p>25 Redistricting Commission viewed these different -- if they</p>	<p>1 viewed these categories the same way you did?</p> <p>2 A I don't know. I don't -- I don't know. I don't</p> <p>3 have any information about how they viewed any of this.</p> <p>4 MR. MULJI: Object to form.</p> <p>5 Q (By Mr. Holt) Go ahead.</p> <p>6 A You know, I will note that, you know, all this</p> <p>7 information is on our website in the About data page, so</p> <p>8 it's readily available to them if they look for it.</p> <p>9 Q Understood. And on your website during plaintiffs'</p> <p>10 examination there was an analytics page essentially that</p> <p>11 showed the number of majority minority districts that were</p> <p>12 in a particular map.</p> <p>13 Do you remember seeing that?</p> <p>14 MR. MULJI: Object to form.</p> <p>15 A Yes. I know that that is there. Yeah, we have</p> <p>16 that. We have that on our -- our analytics page, yeah.</p> <p>17 Q (By Mr. Holt) And calculating the majority minority</p> <p>18 districts, first does that calculation assume that all</p> <p>19 minority groups essentially are a cohesive unit, or does</p> <p>20 it view them individually?</p> <p>21 A I don't -- I don't really understand the question,</p> <p>22 what you mean by cohesive group, but -- Yeah.</p> <p>23 Q Let me just rephrase. If there is a population of</p> <p>24 30 percent Hispanic and 25 percent Black, would those</p> <p>25 different minority populations be combined in that in</p>

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<p>1 arriving at that calculation if that was indeed a majority 2 minority district?</p> <p>3 MR. MULJI: Object to form.</p> <p>4 THE WITNESS: Sorry?</p> <p>5 MR. MULJI: I'm sorry, Dave. After he asks 6 the question I may object to form, but you should answer 7 the question.</p> <p>8 THE WITNESS: Yeah. Okay.</p> <p>9 A So yeah, the way we -- Yeah. So what we did, so 10 there's a detail portion under minority representation on 11 our analytics page, the Analyze page.</p> <p>12 And essentially we count -- You know, we actually 13 show in a table there, we say, you know, given whatever 14 voting age population dataset you selected, right, as the 15 primary dataset, you know, we can see that, for example, 16 that there are -- There's -- There's one district that has 17 between 40 and 45 percent, you know, voting age population 18 over all minorities. That's all minorities.</p> <p>19 And it might -- Or it might say, you know, there's 20 one that's Hispanic, and it's between 40 and 45 percent. 21 And there's another one between, you know, 50 percent to 22 55 percent. So what -- I mean, so what we're trying to do 23 in our site is we're trying to give the user all this data 24 and, you know, without us judging what -- what's the right 25 thing for them to, you know, consider that this is a</p>	<p>1 strong enough majority district or not for whatever 2 purpose they might be working on.</p> <p>3 Q (By Mr. Holt) So just to make sure I understand 4 correctly, the majority minority metric that you provide 5 takes into account only minority population or citizen 6 voting age population?</p> <p>7 MR. MULJI: Object to form.</p> <p>8 A It depends on whatever primary dataset the user has 9 selected for the voting age population. So it could be 10 the citizen voting age population, or it could be the 11 regular census twenty -- you know, voting age population. 12 Whichever one is selected is what we're going to use.</p> <p>13 And maybe I should just make one more clarifying 14 point. You know, I was describing we have the table that 15 basically is just showing percentages of different 16 minorities. We do give a score, a minority score on that 17 page, and that is an algorithm. It's an amalgam of, you 18 know, how many -- how many majority minority -- you know, 19 minority districts could be produced in this state, and 20 then how many are coalition districts.</p> <p>21 You know, so it's not -- it's not like -- It's our 22 own calculation, or I think my colleague, you know, used a 23 lot of ideas he got from academics; but it's not -- It's 24 not a legal number. You know, it's not a number that you 25 could say -- You know, there's no law that says oh, this</p>
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<p>1 number has to be greater than 70 out of a hundred. You 2 know, blah, blah, blah.</p> <p>3 So I just want to -- We're not saying that that's, 4 you know, a legal number or not. You know, that's really 5 up to, you know, you all who are attorneys who know the 6 law to kind of decide. And there's sort of some deeper 7 scores as well of various things. You know, to kind of 8 look at all those numbers and then decide whether or not 9 that meets the requirements of the law.</p> <p>10 Q (By Mr. Holt) Okay. So in arriving at these 11 population percentages of the different minority groups, 12 you had mentioned that if somebody, you know, checked both 13 the Black and Hispanic boxes they would appear essentially 14 as two individuals in that tally, a Black individual and a 15 Hispanic individual; correct?</p> <p>16 MR. MULJI: Object to form.</p> <p>17 A Yes. If they're using those combination groups, 18 which is what most of our, you know, datasets are, they're 19 going to be counted twice in some cases. Yeah, maybe even 20 more than twice in some cases.</p> <p>21 If they're using that, you know, non-Hispanic 22 voting age population dataset, then they'll only be 23 counted once. They're only in one of those categories.</p> <p>24 Q (By Mr. Holt) Do you know of -- 25 A So it depends on what the user chooses.</p>	<p>1 Q Understood. And do you know of any way to 2 essentially dedupe that duplication in analysis to arrive 3 at a true minority number as opposed to individuals that 4 are counted two or three times?</p> <p>5 MR. MULJI: Object to form.</p> <p>6 A You know, all I can say is that, you know, using 7 that, you know, non-Hispanic voting age population 8 dataset, you know, that dedupes, so that makes it so 9 everyone is only in one category.</p> <p>10 You know, I can't answer whether or not, you know, 11 that's the right thing or what the law says or anything 12 about that.</p> <p>13 Q (By Mr. Holt) Understood. Does the term 14 differential privacy mean anything to you?</p> <p>15 A Yes.</p> <p>16 Q What do you understand differential privacy to mean 17 in terms of the most recent census data?</p> <p>18 A Yeah, I've -- I've heard described by people from 19 the Census Bureau or -- and read that they use something 20 called differential privacy.</p> <p>21 My understanding is that at the census block level 22 and maybe a little bit at higher levels, but I'm not sure 23 about that -- at the census block level they tweaked the 24 numbers so that the block level numbers at least 25 demographically are not always what they really are; and</p>

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<p>1 the reason they did that is because they felt that at the</p> <p>2 block level it was too easy to, you know, figure out who's</p> <p>3 who, basically, and that violated the privacy.</p> <p>4 As you aggregate up to the precinct level and</p> <p>5 higher, then that's no longer the case. That's what my</p> <p>6 understanding is.</p> <p>7 Q As a data person does this, I guess, entrance of</p> <p>8 differential privacy, this noise into the data, does that</p> <p>9 affect your confidence in the makeup of analyzing data at</p> <p>10 the block level with the most recent census data release?</p> <p>11 A Well, I think -- You know, I do understand why they</p> <p>12 do it. I think it's a valid reason, in my opinion.</p> <p>13 I think that, you know, it's a caution to look, you</p> <p>14 know, taking too much about oh, this block or that block.</p> <p>15 I mean, if you're comparing individual blocks. But when</p> <p>16 you're building districts that are made up of lots and</p> <p>17 lots and lots of blocks, I probably would have confidence</p> <p>18 that those numbers are pretty darn close, close enough</p> <p>19 that, you know, at least --</p> <p>20 That's just my opinion; right? I don't -- I don't</p> <p>21 really know anything more than that. But just because of,</p> <p>22 you know, any given, you know, legislative district, you</p> <p>23 know, is composed of -- I don't know -- thousands of</p> <p>24 blocks, probably, that that would not hurt my confidence</p> <p>25 personally.</p>	<p>1 Q So if there was a legislative district that was, you</p> <p>2 know, a hundredth of a percent, a tenth of a percent above</p> <p>3 50 percent minority population, is that a sufficient</p> <p>4 margin of error to be plus or minus due to the entrance of</p> <p>5 differential privacy, in your opinion?</p> <p>6 A You know, I can't -- I can't really say, just</p> <p>7 because, you know, it's really -- It's the intersection of</p> <p>8 what the census produces and what the law says, which is</p> <p>9 really not something I know.</p> <p>10 It's like yeah, it's -- I mean, I guess that's</p> <p>11 really a legal question as to, you know, how close or how</p> <p>12 much above 50 percent, you know, matters, and if this</p> <p>13 affects it that much. So I can't really say.</p> <p>14 Q I guess what I'm trying to get at is I understand</p> <p>15 what the Census Bureau says that is. When I'm trying to</p> <p>16 classify certain racial percentages in a block, if I</p> <p>17 wanted to understand what the actual population is, you</p> <p>18 would agree that there is some margin for error as I've</p> <p>19 tried to compare actual numbers versus the data numbers</p> <p>20 that the Census Bureau released?</p> <p>21 Would you agree with that statement, that there is a</p> <p>22 difference?</p> <p>23 MR. MULJI: Object to form.</p> <p>24 A Well, I think that -- Yeah, I -- I think that what</p> <p>25 the Census Bureau releases, I -- Yeah, I don't know if I</p>
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<p>1 really have an answer to that because, you know, it's</p> <p>2 whatever -- You know, the census data at the block level,</p> <p>3 it's all we've got. You know, there's no -- there's no</p> <p>4 other data to compare it to.</p> <p>5 Q (By Mr. Holt) I mean, for example, if I wanted to</p> <p>6 look at the block level and see how many Black individuals</p> <p>7 lived on that block versus Hispanic, if I'm trying to get</p> <p>8 down right on the boundary lines of the district and it</p> <p>9 says 15 Black and 11 Hispanic, to what degree of</p> <p>10 confidence can I have that those are the actual numbers?</p> <p>11 A Well, I think, you know -- I mean, you know, --</p> <p>12 MR. MULJI: Object to form.</p> <p>13 A -- if you just -- If you're just looking at the one</p> <p>14 block with differential privacy, well then, you know that</p> <p>15 those might not be the numbers; right? So --</p> <p>16 But it's really in, you know, in aggregation does it</p> <p>17 matter, and that's -- You know, I don't think so, but</p> <p>18 that's really for you all to kind of figure out.</p> <p>19 Q (By Mr. Holt) Just kind of an aside, you had</p> <p>20 mentioned the reason you felt the Census Bureau was</p> <p>21 inserting this noise, this differential privacy concept</p> <p>22 into the data was to make it difficult for individuals to</p> <p>23 essentially cross-reference the data and identify personal</p> <p>24 identifying information for the individuals.</p> <p>25 Does that -- Does that accurately state what you</p>	<p>1 previously said?</p> <p>2 A Yeah, that's my understanding --</p> <p>3 MR. MULJI: Object to form.</p> <p>4 A -- from what I heard or learned, but -- Yeah.</p> <p>5 Q (By Mr. Holt) Okay.</p> <p>6 A I could be wrong on that, but that's my</p> <p>7 understanding from what I've heard from the Census Bureau,</p> <p>8 yeah.</p> <p>9 Q Okay. Based on your experience with this website</p> <p>10 and this form that you have, is that something that you</p> <p>11 could have done had they not inserted noise into the data?</p> <p>12 A Is what something --</p> <p>13 MR. MULJI: Object to form.</p> <p>14 A -- I could have done?</p> <p>15 Q (By Mr. Holt) Would you have been able to cross the</p> <p>16 data provided by the Census Bureau in a manner to</p> <p>17 identify -- in a way to identify --</p> <p>18 A Oh.</p> <p>19 Q -- and attach that data to specific individuals?</p> <p>20 A Oh.</p> <p>21 Q Is that something that you had the ability to do?</p> <p>22 A I -- I -- I don't have the ability to do that. It's</p> <p>23 not -- Yeah. I mean, I don't have access to that data.</p> <p>24 I've never really looked for that data.</p> <p>25 I guess, you know -- Yeah. So I don't -- Yeah, I</p>

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<p>1 don't really have the ability to do it myself.</p> <p>2 Q Okay. And when you produced the maps in response to</p> <p>3 the subpoena from plaintiffs, and I'll state that I've</p> <p>4 never seen that response until today. I never looked at</p> <p>5 the maps.</p> <p>6 Were there any maps that you produced that were</p> <p>7 non-Washington state legislative maps?</p> <p>8 A You know, I didn't really look at what was produced</p> <p>9 that closely. The only thing I can say is, you know, I</p> <p>10 saw a lot of Washington maps. Whether --</p> <p>11 I mean, there probably were other maps, other maybe</p> <p>12 congressional maps as well as legislative that at least</p> <p>13 might have been looked at, but I really don't -- I really</p> <p>14 don't know specifically without looking at -- looking back</p> <p>15 at that.</p> <p>16 Q I guess what I'm trying to understand is you</p> <p>17 mentioned there were a few individuals who you had to make</p> <p>18 an educated guess as to which emails were attached to</p> <p>19 these --</p> <p>20 A Yes.</p> <p>21 Q -- individuals.</p> <p>22 Does that correctly state what you previously</p> <p>23 testified to?</p> <p>24 A Yes. Yes.</p> <p>25 Q And in arriving at that estimated guess, did you</p>	<p>1 look to see if they had only created and viewed Washington</p> <p>2 state maps to help identify with some degree of confidence</p> <p>3 that those were the individuals mentioned in the subpoena?</p> <p>4 A I think -- I guess I can say that at least in some</p> <p>5 cases I did note that that account had created Washington</p> <p>6 maps, maybe not exclusively. I didn't really look that</p> <p>7 closely. But it's like oh, yeah, this account has a bunch</p> <p>8 of Washington maps. I think that gives me confidence that</p> <p>9 it's that person.</p> <p>10 I mean, I think you'll probably see with the account</p> <p>11 names that at least in most cases they were pretty</p> <p>12 strongly associated with the names of the individuals in</p> <p>13 most of the cases, so I -- Yeah.</p> <p>14 Q Okay. And just a couple more questions. Just</p> <p>15 returning back to my earlier questions about majority</p> <p>16 minority districts and that metric that is used on your</p> <p>17 website, --</p> <p>18 A Um-hmm.</p> <p>19 Q -- was there any type of partisan calculation to</p> <p>20 determine in a particular district if those minority</p> <p>21 populations would be politically cohesive that you would</p> <p>22 run as a partisan metric?</p> <p>23 MR. MULJI: Object to form.</p> <p>24 THE WITNESS: Shall I answer that?</p> <p>25 MR. HOLT: Yes, please.</p>
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<p>1 MR. MULJI: Yes. And I'll just note if</p> <p>2 it's possible to just make sure -- I made some objections.</p> <p>3 I just want to make sure they're on the record. So if you</p> <p>4 could just pause before answering Dallin's questions, that</p> <p>5 would be great.</p> <p>6 Q (By Mr. Holt) Yes, so I can repeat my question.</p> <p>7 Would you like me to repeat it?</p> <p>8 A I mean, I think I understand the question there.</p> <p>9 So -- Well, so there's really -- You know, we have</p> <p>10 sort of two pages that show different metrics. So on the</p> <p>11 Analyze page, which is where we have the -- you know, the</p> <p>12 kind of scoring or the five scores, one of which is</p> <p>13 minority representation, I am pretty sure, reasonably sure</p> <p>14 that that calculation of what that score is does not</p> <p>15 include any partisan. There's no -- There's nothing on a</p> <p>16 partisan basis about how those populations might vote that</p> <p>17 goes into that calculation.</p> <p>18 There is a different calculation on the Advanced</p> <p>19 page that I'm not completely sure -- My colleague has</p> <p>20 implemented this, and it's basically -- It's based</p> <p>21 directly on something a professor and academic came up</p> <p>22 with and different people have used called demographic</p> <p>23 voting that compares voting patterns of different groups.</p> <p>24 Okay. So that's a completely different metric on</p> <p>25 the Advanced page, and there's -- You know, you have to --</p>	<p>1 You know, the user can use that, but they have to</p> <p>2 specifically select, you know, for this district and this</p> <p>3 population or that population, kind of you can look at</p> <p>4 that kind of thing.</p> <p>5 Yeah, so that would be the only thing that I believe</p> <p>6 could use both; and I have, of course, no idea if anybody</p> <p>7 used -- used that at all.</p> <p>8 Q Okay. So if there was a district that was a plus</p> <p>9 50 percent Hispanic district but it leaned R in a partisan</p> <p>10 metric that you have, whether I'm using a presidential</p> <p>11 race or some other, governor's race or whatnot, would that</p> <p>12 district appear as one of the majority minority districts</p> <p>13 because of the plus 50 percent minority population,</p> <p>14 despite it being a leaning Republican district?</p> <p>15 Would that affect that analysis?</p> <p>16 A It would not affect that analysis, yeah.</p> <p>17 Q Okay. And do you have any professional training as</p> <p>18 a demographer or a statistician?</p> <p>19 A No, I don't.</p> <p>20 Q And is there anyone on your team that works with you</p> <p>21 on this project that is a trained demographer or a</p> <p>22 statistician?</p> <p>23 A No. No.</p> <p>24 MR. HOLT: Awesome. Well, thank you for</p> <p>25 the work you do with the website. That's all the</p>

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<p>1 questions that I have.</p> <p>2 THE WITNESS: Okay. Thanks.</p> <p>3 MR. MULJI: I just have a couple of --</p> <p>4 Unless, Mason, unless you have some questions, I just have</p> <p>5 a couple of followups based on those questions.</p> <p>6 MR. KORTZ: I do not have any questions.</p> <p>7 MR. MULJI: Okay.</p> <p>8 EXAMINATION</p> <p>9 BY MR. MULJI:</p> <p>10 Q Just a couple of quick additional questions, Dave,</p> <p>11 about what you just discussed with Dallin, and I'm just</p> <p>12 going to share my screen for one of them for a moment.</p> <p>13 (Website displayed.)</p> <p>14 Q Is this the page you were discussing with Dallin a</p> <p>15 moment ago, the --</p> <p>16 A Yes. So that's -- Yes, that is the Analyze page</p> <p>17 that has those five scores, one of which is the minority</p> <p>18 score, you know, which I discussed, that's sort of our</p> <p>19 own, I think, calculation.</p> <p>20 And then there's a table down below under minority</p> <p>21 representation that I was discussing, yeah.</p> <p>22 Q Okay. I'm just navigating to the minority</p> <p>23 representation --</p> <p>24 A Right.</p> <p>25 Q -- section.</p>	<p>1 Do you see that?</p> <p>2 A That's right.</p> <p>3 Q Can you read the disclaimer that's displayed on your</p> <p>4 website that I've highlighted here?</p> <p>5 A Yes. "This analysis does not ensure Voting Rights</p> <p>6 Act compliance." Right. Yeah.</p> <p>7 Q Okay. Yeah. A prominent disclaimer there. There's</p> <p>8 an icon next to it with an exclamation point; is that</p> <p>9 right?</p> <p>10 A Yes. Yes, that's there. Yes.</p> <p>11 Q Okay. And I just wanted to clarify some of the</p> <p>12 demographic, the racial and ethnic categories --</p> <p>13 A Right.</p> <p>14 Q -- that you discussed a moment ago.</p> <p>15 So all of the demographic datasets providing racial,</p> <p>16 ethnic categories, --</p> <p>17 A Um-hmm.</p> <p>18 Q -- do they all provide the white non-Hispanic</p> <p>19 category and a Hispanic category?</p> <p>20 A Well, so what we're looking at here is based on</p> <p>21 whichever primary dataset that was selected for voting age</p> <p>22 population.</p> <p>23 So I think that that's just the regular census</p> <p>24 voting age population because otherwise I believe we would</p> <p>25 say -- Well, we certainly would say CVAP if it was CVAP,</p>
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<p>1 and I think we would say NH VAP somewhere in there,</p> <p>2 hopefully, if that was the category selected when we</p> <p>3 looked at that table.</p> <p>4 Q And I'm sorry, I think -- That was sort of a vague</p> <p>5 question. I think what I'm asking is for all of these</p> <p>6 datasets that provide demographic data from the census,</p> <p>7 including ACS and including the decennial census, I'm just</p> <p>8 looking at the sort of two kind of racial breakdowns that</p> <p>9 we discussed.</p> <p>10 A Yes.</p> <p>11 Q One for all of the datasets, and then one that's</p> <p>12 just for that 2020 VAP data with non-Hispanic race alone</p> <p>13 categories?</p> <p>14 A Correct.</p> <p>15 Q In both of those -- In all of these datasets you</p> <p>16 have a white alone, not Hispanic category; correct?</p> <p>17 A Yes.</p> <p>18 Q And in all of these datasets you have a Hispanic,</p> <p>19 and that's all Hispanic regardless of race; correct?</p> <p>20 A That's correct.</p> <p>21 Q So in all of these datasets the white alone, not</p> <p>22 Hispanic, and the Hispanic category are sort of mutually</p> <p>23 exclusive categories; correct?</p> <p>24 A Well, they are, yeah, mutually exclusive with each</p> <p>25 other. And they're going to be the same in both datasets,</p>	<p>1 you know, if it's both the 2020 census dataset.</p> <p>2 I mean, the only thing is it's in that first</p> <p>3 category. That's the only one where it's not mutually</p> <p>4 exclusive with the race categories. That's just a --</p> <p>5 Does that answer your question?</p> <p>6 Q Yes.</p> <p>7 A Sorry.</p> <p>8 Q Sorry. I guess if you're in the white category, you</p> <p>9 are not in the Hispanic category; is that right?</p> <p>10 A That's correct. That's correct.</p> <p>11 Q And if you're in the Hispanic category, you could be</p> <p>12 white. You could be any race, but -- That's what it</p> <p>13 means.</p> <p>14 A That's correct. Right.</p> <p>15 Q Thank you for clarifying.</p> <p>16 MR. MULJI: That's all the questions that I</p> <p>17 had.</p> <p>18 THE WITNESS: Okay.</p> <p>19 MR. HOLT: Nothing further from the</p> <p>20 intervenor defendants.</p> <p>21 MR. MULJI: Thanks. So I think that wraps</p> <p>22 us up. Jeanne, is there anything left on the back end?</p> <p>23 (Discussion re reviewing transcript.)</p> <p>24 (Deposition concluded at 2:57 p.m.)</p> <p>25 (Signature reserved.)</p>

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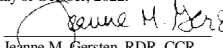
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## 1 CERTIFICATE

2 STATE OF WASHINGTON )

3 ) SS

4 County of King )

5 I, the undersigned Washington Certified Court  
Reporter, pursuant to RCW 5.28.010 authorized to  
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  
and reduced to typewritten form under my direction.7 I further certify that the witness examined will be  
given an opportunity to review and sign their deposition  
after the same is transcribed, unless indicated in the  
record that the parties and witness waived the signing.8 I further certify that all objections made at the  
time of said examination to my qualifications or the  
manner of taking the deposition or to the conduct of any  
party have been noted by me upon the deposition.9 I further certify that I am not a relative or an  
employee or attorney or counsel of any of the parties to  
said action, or a relative or employee of any such  
attorney or counsel, and that I am not financially  
interested in the said action or the outcome thereof.10 I further certify that the witness before examination  
was by me duly sworn to testify the truth, the whole  
truth, and nothing but the truth.11 I further certify that the deposition, as  
transcribed, is a full, true and correct transcript of the  
testimony, including questions and answers and all  
objections, motions and exceptions of counsel made and  
taken at the time of the foregoing examination and was  
prepared pursuant to Washington Administrative Code  
308-14-135, the transcript preparation format guideline.12 IN WITNESS WHEREOF, I have hereunto set my hand this  
30th day of October, 2022.13   
14 Jeanne M. Gersten, RDR, CCR  
15 Registered Diplomat Reporter  
16 Washington CCR No. 2711  
17 License effective until April 2, 2023  
18 Residing at Seattle, Washington  
19  
20  
21  
22  
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24  
25

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## 1 CHANGE/SIGNATURE SHEET

2 I, the undersigned, DAVID G. BRADLEE, 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  
12  
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14  
15  
16  
1718  
19 Signature Date20 Witness: David G. Bradlee for Dave's Redistricting, LLC  
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: October 18, 2022

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

LAKESIDE REPORTING

(833) 365-3376

Jeanne@LakesideReporting.com

Contact@LakesideReporting.com

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