

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF WISCONSIN

ALVIN BALDUS, CINDY BARBERA,
CARLENE BECHEN, RONALD BIENDSEIL,
RON BOONE, VERA BOONE, ELVIRA BUMPUS,
EVANJELINA CLEEREMAN, SHEILA COCHRAN,
LESLIE W. DAVIS III, BRETT ECKSTEIN,
MAXINE HOUGH, CLARENCE JOHNSON,
RICHARD KRESBACH, RICHARD LANGE,
GLADYS MANZANET, ROCHELLE MOORE,
AMY RISSEEUW, JUDY ROBSON, GLORIA ROGERS,
JEANNE SANCHEZ-BELL, CECELIA SCHLIEPP,
and TRAVIS THYSSEN,

Plaintiffs,

TAMMY BALDWIN, GWENDOLYNNE MOORE,
and RONALD KIND,

Intervenor-Plaintiffs,

v.

Civil Action
File No. 11-CV-562

Members of the Wisconsin Government
Accountability Board, each only in
his official capacity:
MICHAEL BRENNAN, DAVID DEININGER,
GERALD NICHOL, THOMAS CANE,
THOMAS BARLAND, and TIMOTHY VOCKE,

[Caption Continued]

VIDEOTAPE DEPOSITION

JOSEPH W. HANDRICK

Madison, Wisconsin
April 30, 2013

Susan C. Milleville, Court Reporter

and KEVIN KENNEDY, Director and
General Counsel for the Wisconsin
Government Accountability Board,

Defendants,

F. JAMES SENSENBRENNER, JR.,
THOMAS E. PETRI, PAUL D. RYAN, JR.,
REID J. RIBBLE, and SEAN P. DUFFY,

Intervenor-Defendants.

VOCES DE LA FRONTERA, INC.,
RAMIRO VARA, OLGA VARA,
JOSE PEREZ, and ERICA RAMIREZ,

Plaintiffs,

v.

Case No. 11-CV-1011
JPS-DPW-RMD

Members of the Wisconsin Government
Accountability Board, each only in
his official capacity:

MICHAEL BRENNAN, DAVID DEININGER,
GERALD NICHOL, THOMAS CANE,
THOMAS BARLAND, and TIMOTHY VOCKE,
and KEVIN KENNEDY, Director and
General Counsel for the Wisconsin
Government Accountability Board,

Defendants.

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I N D E X

<u>Witness</u>	<u>Pages</u>
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E X H I B I T S

<u>No.</u>	<u>Description</u>	<u>Identified</u>
1	Subpoena	--

(The original exhibit was attached to the original transcript and copies were provided to counsel)

(The original deposition transcript was filed with Attorney Peter G. Earle)

1 VIDEOTAPE DEPOSITION of JOSEPH W. HANDRICK,
2 called as a witness of lawful age, taken on behalf of
3 the Plaintiffs, wherein Alvin Baldus, et al., are
4 Plaintiffs, and Members of the Wisconsin Government
5 Accountability Board, et al., are Defendants, pending
6 in the United States District Court for the
7 Eastern District of Wisconsin, pursuant to subpoena,
8 before Susan C. Milleville, a Court Reporter and
9 Notary Public in and for the State of Wisconsin, at
10 the offices of Godfrey & Kahn, S.C., Attorneys at
11 Law, One East Main Street, in the City of Madison,
12 County of Dane, and State of Wisconsin, on the 30th
13 day of April 2013, commencing at 3:21 in the
14 afternoon.

15
16
17 A P P E A R A N C E S

18
19 DOUGLAS M. POLAND, Attorney,
20 for GODFREY & KAHN, S.C., Attorneys at Law,
21 One East Main Street, Suite 500, Madison,
Wisconsin 53703, appearing on behalf of
Plaintiffs Alvin Baldus, et al.

22
23 PETER G. EARLE, Attorney,
24 for LAW OFFICE OF PETER EARLE, LLC, Attorneys at Law,
839 North Jefferson Street, Suite 300,
25 Milwaukee, Wisconsin 53202, appearing by
telephone on behalf of Plaintiffs
Voces De La Frontera, Inc., et al.

A P P E A R A N C E S (Continued)

MARIA S. LAZAR, Assistant Attorney General,
for STATE OF WISCONSIN DEPARTMENT OF JUSTICE,
17 West Main Street, Madison, Wisconsin 53703,
appearing on behalf of Defendant Members of
the Wisconsin Government Accountability Board.

AYAD P. JACOB, Attorney,
for SCHIFF HARDIN LLP, Attorneys at Law,
6600 Willis Tower, Chicago, Illinois 60606,
appearing on behalf of Michael Best &
Friedrich LLP.

CYNTHIA L. BUCHKO, Attorney,
for WHYTE HIRSCHBOECK DUDEK S.C., Attorneys at Law,
33 East Main Street, Suite 300, Madison,
Wisconsin 53701-1379, appearing on behalf of
the Wisconsin Senate, Wisconsin Assembly,
Wisconsin Senate Chief Clerk Jeff Renk,
Wisconsin Assembly Chief Clerk Patrick E.
Fuller and the Wisconsin Legislative Technology
Services Bureau.

Also present: Todd S. Campbell, CLVS
Campbell Legal Video Company
417 Heather Lane, Suite B
Fredonia, WI 53021
(262) 447-2199

1 (Exhibit No. 1 marked for
2 identification)

3 JOSEPH W. HANDRICK,
4 called as a witness, being first duly sworn,
5 testified on oath as follows:

6 EXAMINATION

7 By Mr. Earle:

8 Q Would you state your name and spell your last name
9 for the record.

03:21PM

10 A My name is Joseph W. Handrick, H-a-n-d-r-i-c-k.

11 Q Mr. Handrick, you have been deposed before?

12 A Yes.

13 Q I'm going to ask you a series of question. You're
14 under oath and required to answer them.

03:21PM

15 Occasionally your attorney may object. We will
16 allow her to make that objection after which you
17 will be directed to answer the question. Do you
18 understand that?

19 A Yes.

03:21PM

20 Q Occasionally she may assert privilege in which
21 case I'll ask her the basis for it, and she may
22 direct you not to answer the question. Do you
23 understand that?

24 A Yes.

03:21PM

25 Q If I ask you a question and you answer the

1 question, any person reading this transcript will
2 presume that you understood the question as it was
3 worded and that your answer was intentional to
4 that question. Do you understand that?

03:21PM

5 A Yes.

6 Q So if you don't understand the question fully, I
7 suggest to you that you pause and tell me that and
8 I will try to accommodate any ambiguity you see in
9 the question. Okay?

03:22PM

10 A Okay.

11 Q You promise to be fully candid with me in your
12 answers in this deposition here today?

13 A I promise to tell the truth.

14 Q Do you promise to be fully candid? That's the
15 question I asked.

03:22PM

16 A I'm not sure I understand the difference.

17 Q Do you understand what the word candid means?

18 A I think it means to be truthful and forthright.

19 Q Do you promise to be truthful and forthright?

03:22PM

20 A Yes.

21 Q When did learn about this deposition here today?

22 A I received a call. I can't give you the exact
23 date. Maybe approximately ten days ago.

24 Q From who?

03:23PM

25 A From an attorney that's representing the

1 legislature.

2 Q Whyte Hirschboeck?

3 A Whyte Hirschboeck. Yes.

4 Q When did you hire counsel?

03:23PM

5 A I have not.

6 Q Let me strike that question. Did you hire

7 counsel?

8 A I have not gone out and hired counsel or signed a
9 contract.

03:23PM

10 Q Have you asked anyone to represent you?

11 A Yes.

12 Q Who did you ask to represent you?

13 A Upon being served the subpoena, I asked the
14 legislative attorneys if I was still as their
15 consultant covered by that representation.

03:23PM

16 Q That's how you came to be represented today by
17 Ms. Buchko sitting to your right?

18 A Correct.

19 Q Okay. Have you spoken to any attorneys other than
20 attorneys at Whyte Hirschboeck in preparation for
21 today's deposition?

03:24PM

22 A No.

23 Q Who have you consulted with in preparing for
24 today's deposition other than counsel at Whyte
25 Hirschboeck?

03:24PM

1 A I have not consulted with anybody other than the
2 attorneys at Whyte Hirschboeck.

3 Q So you have not discussed the subject matter of
4 this deposition and your activities in the
03:24PM 5 redistricting project after receiving the notice
6 of this deposition with anybody other than
7 attorneys at Whyte Hirschboeck?

8 A Not other than to inform my superiors that I would
9 be having this deposition; that I would be taking
03:24PM 10 vacation time.

11 Q Did you review any documents?

12 A Yes.

13 Q What documents did you review?

14 A I reviewed last night and today my two prior
03:25PM 15 depositions. Actually, correct that. I believe
16 it was considered one ongoing deposition given
17 over two days. I reviewed those documents.

18 Q Anything else?

19 A I also reviewed some E-mails that had been
03:25PM 20 disclosed by the -- I believe they were disclosed
21 by the plaintiffs during some recent interactions
22 with the Court.

23 Q Had you ever seen those E-mails before?

24 A Yes.

03:25PM 25 Q When had you seen them before?

1 A When had I seen them before?

2 Q Yes.

3 A I had seen them around the time of the previous
4 depositions.

03:25PM 5 Q Did you bring any papers with you today?

6 A No.

7 Q Mr. Handrick, I want to ask you a series of
8 questions about your activities related to the
9 redistricting project in particular with regards

03:26PM 10 to the production of documents and your use of
11 computers in that process. Would you identify --
12 we will start by identifying all of the computers
13 that you used to work on the redistricting
14 process. Can you tell me about them. Describe
03:26PM 15 them to me.

16 A The redistricting computer that I used?

17 Q That wasn't the question. I'm asking you to
18 identify all computers that you made use of in the
19 course of your redistricting work.

03:26PM 20 A The redistricting computer that was housed at
21 Michael Best & Friedrich.

22 Q Anything else?

23 A I had a laptop provided by the Reinhart law firm.

24 Q Anything else?

03:27PM 25 A Not that I can recall.

1 Q You didn't have a standalone computer at Reinhart?

2 A No.

3 Q Did you have a computer at home that you used?

4 A No.

03:27PM

5 Q Did you have any personal computer anywhere else
6 that you used?

7 A No.

03:27PM

8 Q So your testimony here today is that the entire
9 universe of the computers that you used for
10 redistricting consisted of the State computer
11 housed at the Michael Best & Friedrich law firm
12 and a laptop provided to you by Reinhart?

13 A That's to the best of my memory. Yes.

03:27PM

14 Q Describe for me the use that you made of the
15 laptop.

16 A The laptop was my computer that I used between the
17 two Reinhart offices in the place of what you
18 would call a standalone computer.

03:28PM

19 Q Was that connected by Citrix or similar type
20 program to a network?

21 A Yes.

22 Q What network was it connected to?

23 A When that computer was at one of the two Reinhart
24 offices, it was part of the Reinhart network.

03:28PM

25 Q What about remotely when you were in neither

1 location or when you were at home for example?

2 A When I was at home, I could use it only for
3 E-mail. I don't believe I had the ability to tie
4 into the Reinhart network from home.

03:28PM

5 Q But you used it for E-mail?

6 A Yes.

7 Q And what E-mail accounts did you use for
8 redistricting? Let me rephrase that question.

03:29PM

9 I'll withdraw that one. Okay? Would you identify
10 every E-mail account through which you received or
11 sent messages that in any way related to your
12 redistricting activities.

13 A A Reinhart.com E-mail address, and an MSN.com
14 E-mail address.

03:29PM

15 Q Did you use any other electronic means of
16 communication in connection with your
17 redistricting work?

18 A I believe I had submitted at least one document
19 that was a Facebook messaging correspondence, so I
20 believe that would be included in your question.

03:29PM

21 Q So your testimony is you used the Facebook social
22 media to communicate about redistricting matters?

23 A Yes.

24 Q Did you engage in any communication with anybody
25 about redistricting on Facebook beyond the

03:30PM

1 printout of your communication with Mr. Gaddie?

2 A Not that I'm aware of.

3 Q That printout we have of your communication with
4 Mr. Gaddie, that was the sum total of your use of
03:30PM 5 social media for purposes of redistricting
6 communications?

7 A I believe so. Yes.

8 Q The Reinhart.com E-mail address, did you use --
9 how extensively did you use that in connection
03:30PM 10 with the redistricting activity?

11 A That was the primary E-mail that I used, so the
12 answer would be extensively.

13 Q Would you please describe for me how it was that
14 you gathered responsive documents from that E-mail
03:31PM 15 account for purposes of responding to the
16 subpoenas that were issued in the redistricting
17 case prior to your deposition.

18 A Certainly. The Reinhart information technology
19 section -- I'm sorry. They may have a name. But
03:31PM 20 the IT section under the direction of counsel at
21 the firm did a search of my E-mail system
22 searching for E-mails to and from any person that
23 had been associated with the process.

24 Q Who comprised the list of persons associated with
03:31PM 25 the process?

1 A Who comprised the list or compiled the list?

2 Q Compiled the list.

3 A Compiled the list.

4 Q Accuracy is important.

03:31PM

5 A I don't know who exactly compiled that list.

6 Q Well, do you know who was on the list that was
7 actually checked?

8 A What they were looking for was any E-mail from me
9 or to me that related to redistricting. So they

03:32PM

10 would have then done a search for any of the
11 people with whom I had been in contact with
12 regarding redistricting.

13 Q I want precise knowledge here, precise facts. Who
14 compiled the specifications for that search?

03:32PM

15 MS. BUCHKO: Objection, asked and
16 answered.

17 A I don't know who particularly or exactly compiled
18 that list.

19 Q So you were not party to any discussion with
20 regards to the specifications for searching the
21 Reinhart E-mail system for documents responsive to
22 the subpoena? Is that an accurate statement?

03:32PM

23 THE WITNESS: Can you repeat that.
24 (Question read)

03:33PM

25 A No.

1 Q Who did you have discussions with about the
2 specifications?

3 A I believe it was Patrick Hodan who gave the
4 overall instructions to the IT people to gather
03:33PM 5 all of the relevant E-mails.

6 Q That wasn't the question. Is the answer to the
7 question that you had discussions with
8 Patrick Hodan about the specifications?

9 A I don't remember the exact conversation.

03:33PM 10 Q Okay. You have testified the sum total of your
11 knowledge about the subject of the specifications
12 or the search for responsive E-mails on the
13 Reinhart E-mail system. Is that an accurate
14 statement?

03:34PM 15 A Yes.

16 Q How did you conduct a search for responsive
17 documents from your MSN.com account?

18 A Similarly. I went into both my sent as well as my
19 incoming folders and gathered any E-mail that was
03:34PM 20 related to redistricting and printed it.

21 Q What kinds of parameters did you use for that
22 search?

23 A The parameters were if it was related to
24 redistricting.

03:34PM 25 Q Were there any date parameters?

1 A Yes.

2 Q What were the date parameters?

3 A If something was after November 22, 2011, I would
4 not have printed those off.

03:35PM

5 Q November 22, 2011?

6 A I think that would be the date. Yes.

7 Q And what was the basis for that date limitation?

8 A My understanding is that was the date after which
9 I was part of a firm that was helping the attorney
10 general's office represent the GAB in a phase of
11 the case.

03:35PM

12 Q Did you withhold any documents on a topical basis
13 related to redistricting?

14 A I don't understand what that means, on a topical
15 basis.

16 Q Well, did you exclude documents related to SB 150
17 from your search?

18 A Can you help me with what that is.

19 Q SB 150?

03:36PM

20 A Yes.

21 Q You are obviously living a fruitful and happy life
22 because you have forgotten what that means.

23 SB 150 was Act 39 which was the legislation that
24 dealt with the sequencing of the ward line drawing
25 in relationship to State redistricting.

03:36PM

1 A Now you know why I've left lobbying. No. I would
2 have printed and gathered any E-mail related to
3 redistricting.

03:36PM

4 Q So is it accurate to say that you compiled a pile
5 of documents for purposes of responding to the
6 subpoena?

7 A Yes.

8 Q Were the documents gathered by Patrick Hodan at
9 Reinhart given to you?

03:37PM

10 A No.

11 Q Do you know whether Patrick Hodan or anybody else
12 at Reinhart did something with the documents
13 gathered on your behalf from the Reinhart computer
14 system?

03:37PM

15 A Yes.

16 Q What do you know about that?

17 A My understanding is that they were all delivered
18 to Eric McLeod at Michael Best & Friedrich.

03:37PM

19 Q Were you ever given a log or inventory of those
20 documents?

21 A Not that I remember.

22 Q You never went through the pile yourself?

23 A Counsel, are you referring to the pile from the
24 Reinhart machine?

03:37PM

25 Q Yes.

1 A Not that I remember.

2 Q Do you know what format they were given to
3 Eric McLeod in?

4 A No. I would have no idea.

03:37PM 5 Q Did you ever discuss that group of documents with
6 anybody at the Michael Best law firm?

7 A Yes.

8 Q Who did you discuss them with?

9 A Eric McLeod.

03:38PM 10 Q Do you recall when that conversation occurred?

11 A Just generally it was around the time of my
12 depositions.

13 Q Now, with regards to the pile of documents that
14 you compiled from your MSN.com account and your
03:38PM 15 laptop or anywhere else that you had documents,
16 what did you do with that pile?

17 A Those were provided to Mr. Hodan or one of his
18 assistants at Reinhart.

03:39PM 19 Q So you did not give them or deliver them directly
20 to Michael Best yourself. It was somebody at
21 Reinhart who did that?

22 A That's my memory. Yes. It was someone at
23 Reinhart that delivered them.

03:39PM 24 Q Do you know if a log was created of those
25 documents?

1 A I do not.

2 Q Did you ever ask Patrick Hodan or any other lawyer
3 at Reinhart whether they created a log of the
4 documents that they gathered on your behalf?

03:39PM 5 A No. Not that I remember.

6 Q Do you know if there were any document control
7 approaches used with the management of those
8 documents?

9 MS. BUCHKO: Object, foundation.

03:39PM 10 A No. I don't know if there were.

11 Q Do you know if they were Bates numbered or
12 anything like that?

13 A No. I do not.

14 Q Do you know if they were imaged?

03:39PM 15 A No. I do not.

16 Q Did you discuss that second pile of documents with
17 anybody after you turned them over to
18 Patrick Hodan?

19 A Yes.

03:39PM 20 Q Who did you discuss them with?

21 A Eric McLeod at Michael Best.

22 Q And that was prior to your deposition?

23 A I believe so.

03:40PM 24 Q Were any of the documents that you turned over to
25 Patrick Hodan to your knowledge not turned over to

1 the plaintiffs in the case?

2 A I believe the answer is yes.

3 Q What documents were not turned over?

03:40PM

4 A There were documents related to Act 39 that were,
5 as far as I know, not turned over by Michael Best.

6 Q Were you aware that those documents were being
7 withheld before the production occurred on your
8 behalf?

9 A No.

03:40PM

10 Q Was there an explanation given to you as to why
11 those documents were not turned over?

12 A No, because I was not necessarily aware at that
13 time that they weren't.

03:41PM

14 Q So at the time you were deposed, you were not
15 aware that the documents related to Act 39 had
16 been withheld from production?

17 A That's correct.

03:41PM

18 Q Were there any other documents that were withheld
19 from production to your knowledge other than the
20 Act 39 documents?

21 A To my knowledge no.

22 Q Okay. The next topic I'm going to ask you about
23 is your use of the computer at Michael Best.

03:41PM

24 Okay? Is it accurate to say that you were
25 assigned a computer at Michael Best?

1 A Yes.

2 Q Was that computer set up and functioning when you
3 first had opportunity to use it?

4 A Yes.

03:41PM

5 Q Who instructed you on how to use that computer?

6 A Primarily Tad Ottman.

7 Q When did you first start working on that computer
8 over at Michael Best?

03:42PM

9 A Roughly speaking, it would have probably been in
10 the neighborhood of February of 2011.

11 Q So it's your testimony that in February of 2011
12 you went over to Michael Best and that computer
13 was there and you started using it?

14 A That's my recollection. Yes.

03:42PM

15 Q When were you hired -- I know we covered this in
16 your deposition. It's not readily available on my
17 abstract. When were you hired to work on the
18 redistricting project?

03:42PM

19 A The law firm of Reinhart was retained by the law
20 firm of Michael Best I believe in January of 2011.

21 Q And that retention agreement was in order to
22 provide your consulting services to the
23 redistricting project, correct?

24 A Yes.

03:43PM

25 Q I won't go through the testimony we gathered from

1 you about that process before, but I just want to
2 use it as a point of departure. How soon did you
3 end up over at Michael Best after that retainer
4 agreement was worked out between Reinhart and
5 Michael Best?

03:43PM

6 A My memory, and it is quite awhile ago, is probably
7 within a few weeks.

8 Q How certain are you that in February of 2011 you
9 went over there and were given use of a computer?

03:43PM

10 A I would not bet my house on it.

11 Q You want to keep your house?

12 A It is for sale.

13 MR. JACOB: That would be a candid
14 response.

03:43PM

15 MR. EARLE: So far I think we're
16 getting candid responses.

17 Q Now, when you went over there and first had use of
18 the computer at Michael Best, how many computers
19 were in the room where you would work?

03:44PM

20 A My recollection is that there were three.

21 Q Is it your understanding that there was one
22 computer that you had exclusive access to?

23 A No.

24 Q Okay. Is there one computer that you used
25 exclusively?

03:44PM

1 A Yes.

2 Q Who else had access to that computer that you used
3 exclusively?

03:44PM

4 A Tad Ottman and Adam Foltz both would have access
5 to the computer that I had use of.

6 Q How often did you use that computer?

7 A Between February and June of 2011 the best answer
8 I could give you was probably a couple times a
9 week.

03:45PM

10 Q On those two times per week, how long were those
11 occasions?

12 A Again, on an average I would say a typical stint
13 there would probably be three to four hours.

03:45PM

14 Q So six to eight hours a week from February through
15 June of 2011? Is that a fair description of your
16 use of that computer?

17 A Yes. Evened out over time.

03:45PM

18 Q During that period of time, did you delete any
19 documents related to the redistricting process
20 from that computer?

21 A During that time or any other time I did not
22 delete any documents or files from that computer.

03:46PM

23 Q Are you aware of anybody else deleting any
24 documents from your computer that was housed at
25 Michael Best during the time that you had access

1 to it?

2 A No. I'm not.

3 Q Did you ever discuss the deletion of documents
4 related to redistricting with anybody during the
03:46PM 5 time that you participated in the process?

6 MR. JACOB: Object to form.

7 A Yes.

8 Q Who did you discuss it with?

9 A Patrick Hodan.

03:46PM 10 Q When was that?

11 A Again, around the time of the depositions.

12 Q That would have been in December of 2010 and
13 January of 2011?

14 A No. I think you're a year off. I'm sorry,
03:46PM 15 counsel. Were you still referring to the Michael
16 Best computer?

17 Q Yes.

18 THE WITNESS: Can you please repeat
19 his original question. I answered a question
03:46PM 20 he didn't ask.

21 Q Why don't you tell me what question you answered
22 before we repeat the question I asked.

23 A What I heard was did I discuss the subject of
24 deletion of documents on any computer during that
03:47PM 25 time, and I was going back to what we had

1 previously discussed about what Patrick Hodan was
2 securing all of my E-mails and was telling me make
3 sure I don't delete anything. That of course was
4 in reference to the Reinhart computer.

03:47PM

5 Q Got you. We will read the question back.

6 (The following was read by the reporter:

7 Q "Did you ever discuss the deletion of
8 documents related to redistricting with anybody
9 during the time that you participated in the
10 process?")

03:46PM

11 A The context is on that computer. No.

12 Q And when I say during the process, that means the
13 process you were operating as a consultant related
14 to the redistricting process.

03:48PM

15 A Correct.

16 Q Okay. All right. Did anybody at Michael Best
17 ever instruct you to preserve documents and not
18 delete them?

19 A Not to the best of my memory. No.

03:48PM

20 Q Did you ever discuss with Adam Foltz or Tad Ottman
21 whether documents had been deleted from the
22 computers at Michael Best during the time that
23 those computers were deployed for the purposes of
24 redistricting?

03:48PM

25 A No. Not to my memory.

1 Q Now, were you involved with bringing any of those
2 computers over to the Reinhart law firm?

3 A No.

4 Q Were you aware of whether any of the computers
03:49PM 5 from Michael Best were brought over to the
6 Reinhart law firm at any point in time, any point
7 in time?

8 A Yes.

9 Q What do you know about that?

03:49PM 10 A My memory is that during the trial itself there
11 was a computer there.

12 Q What do you know about that?

13 A My memory is that it was brought over by
14 Adam Foltz and used by Adam Foltz.

03:49PM 15 Q And what do you know about who made that
16 arrangement?

17 A Sorry. I don't.

18 Q Were you involved in any way, shape, or form with
19 the use of that computer at Reinhart during the
03:49PM 20 course of the redistricting trial?

21 A Not to my memory.

22 Q Where within the Reinhart law firm was that
23 computer located?

24 A Boy. I honestly can't remember.

03:50PM 25 Q Were you working at Reinhart during the

1 redistricting trial?

2 A Yes.

3 Q Were you involved in any way with the defense of
4 the plaintiffs during the redistricting trial?

03:50PM

5 A Yes.

6 Q Without communicating to me about your
7 communications with defense counsel, what was your
8 role?

03:50PM

9 A My role was to assist the legal team as they
10 appeared before the court. In defending Acts 43
11 and 44, my role was to help them understand sort
12 of that translation between what was in the map
13 itself and how to turn that into language to
14 explain to the Court or to anyone else who would
15 ask.

03:51PM

16 Q Which attorneys did you work with in the course of
17 assisting the defense during the redistricting
18 trial?

03:51PM

19 A I worked with Attorneys Dan Kelly, Patrick Hodan,
20 Maria Lazar, Joe Voiland, and Jacob Curtis.

21 Q Did Adam Foltz interact with that team during that
22 period of time?

23 A During the trial. Yes.

03:51PM

24 Q Did you witness Adam Foltz interacting with that
25 defense team during the trial?

1 A Yes.

2 Q What did you witness?

3 A What I witnessed was when a witness would need a
4 graphical representation of something that was in
03:52PM 5 the map, Adam would be the one who could produce
6 that for them.

7 Q So is it your testimony that Adam Foltz prepared
8 demonstrative exhibits for the trial with the
9 computer that was brought over there?

03:52PM 10 A No.

11 Q Is that an incorrect statement that I just made?

12 A I would have no way of knowing what he was
13 producing to help somebody view something whether
14 that became a demonstrative exhibit or not.

03:52PM 15 Q I see. But he produced documents from the
16 computer to assist in the defense of the trial.
17 Is that your testimony?

18 A Yes.

19 Q What do you know about that?

03:52PM 20 A That is what I know about that.

21 Q Well, did you see any of the documents he produced
22 during the course of the trial to assist in the
23 defense of the trial?

24 A I may have, but none of them were produced to me.

03:53PM 25 Q Were you given an opportunity to review any of

1 them at that time?

2 A Not that I recall.

3 Q Who was Adam Foltz interacting with in that
4 regard?

03:53PM 5 A Primarily my recollection it was Professor
6 Bernard Grofman.

7 Q Which lawyers were involved with that and
8 Professor Grofman?

9 A My recollection would be probably Patrick Hodan.

03:53PM 10 Q Did you hear any discussions about the type of
11 information that was being provided to either
12 Patrick Hodan or Bernard Grofman by Adam Foltz?
13 Listen to the question.

14 MS. BUCHKO: Repeat the question,
03:54PM 15 please.

16 (Question read)

17 MR. EARLE: That was artfully
18 worded to avoid your objection.

19 MS. BUCHKO: Say that again,
20 please.

21 (Question read)

22 MS. LAZAR: I will object. That's
23 going into attorney-client privilege. You're
24 asking about conversations that were leading
03:54PM 25 to the defense of the defendants in the case.

1 You're asking what the subject of --

2 MR. EARLE: How could there be a
3 privilege with the presence of Adam Foltz in
4 the room? If you can tell me that, a basis
03:55PM 5 for that, then I will back off. I don't see
6 that -- I did not ask what Patrick Hodan
7 said.

8 MS. LAZAR: No. But the question
9 was if he heard any discussions. If the
03:55PM 10 discussions were between Patrick Hodan and
11 Bernard Grofman and Adam Foltz wasn't there,
12 then those are privileged. You didn't ask
13 him that. You asked if he heard any
14 discussion. He can answer if he heard
03:55PM 15 discussions, and then we will see who was
16 present in the room.

17 A I don't remember any.

18 Q Okay. You don't remember any or you don't
19 remember the content of any?

03:55PM 20 A I don't remember the content.

21 Q But you do remember that there were discussions
22 between Patrick Hodan and Bernard Grofman and
23 Adam Foltz about material which involved using the
24 computer in some fashion, correct?

03:56PM 25 A Yes.

1 Q Do you remember anything that Adam Foltz said
2 during that time frame?

3 A No.

03:56PM

4 Q Did you know that that was one of the computers
5 from the Michael Best law firm here in Madison?

6 A I presumed it was.

7 Q Did you find that surprising?

8 A No.

9 Q What room was that computer in?

03:57PM

10 A I really don't recall, counselor.

11 Q Was there a war room set up over at Reinhart?

12 A There was a room held for us to have conferences
13 during the trial.

14 Q Was that the room that the computer was in?

03:57PM

15 A My memory is that it was, but I couldn't identify
16 where that room was or what type of room it was.

17 Q When you work at Michael Best, did you correspond
18 with anybody -- when you were consulting on behalf
19 of Reinhart for Michael Best on the redistricting,
03:58PM 20 did you talk with anybody about the role of
21 citizenship in calculating or determining whether
22 or not the Latino community would constitute an
23 effective voting majority in electoral districts
24 in Milwaukee?

03:58PM

25 A No.

1 Q Did you see any communications from anybody about
2 the subject of whether citizenship was a factor to
3 consider in that process?

4 A Yes.

03:58PM 5 Q What did you see?

6 A I've seen communications that I believe you
7 disclosed at around the time of the deposition for
8 trial between Mr. Troupis and a Latino
9 organization.

03:59PM 10 Q Anything else?

11 A My own deposition you spoke to some length about
12 that topic.

13 Q And we have that record. I'm not going to rehash
14 that. I want to know whether you had any
03:59PM 15 conversations with Adam Foltz, Tad Ottman,
16 Eric McLeod, Ray Taffora, or anybody else at
17 Michael Best or Jim Troupis about that subject
18 while you were a consultant working on
19 redistricting over at Michael Best.

03:59PM 20 MS. BUCHKO: I'm going to object.
21 I think this goes beyond the scope of this
22 intended deposition which should relate to
23 pretrial discovery issues and not rehashing
24 the merits of the redistricting case.

03:59PM 25 MR. EARLE: This is not a topic of

1 the 30(b)(6).

2 MS. BUCHKO: I disagree. The Court
3 has given you an instruction to go ahead or
4 authorization to pursue with discovery
04:00PM 5 related to pretrial discovery issues. I
6 think this is going outside the scope and is
7 rehashing merits issues.

8 MR. EARLE: It's not.

9 Q Go ahead.

04:00PM 10 A No.

11 Q Okay. Is it accurate to say that you were kind of
12 a somewhat less involved participant in the
13 redistricting process compared to the role of the
14 others working at Michael Best here in Madison?

04:00PM 15 A By others you mean?

16 MR. JACOB: Object as to form.

17 Q Ottman and Foltz and McLeod and Taffora.

18 A Yes. That's a fair statement.

19 Q At any point in time did you hear any discussions
04:01PM 20 about withholding documents from the plaintiffs?

21 A Yes.

22 Q What did you hear?

23 A After.

24 MR. JACOB: Object as to form.

04:01PM 25 Go ahead.

1 Q Go ahead.

2 A After all my documents were submitted to Michael
3 Best, I made an inquiry as to who decides whether
4 or not they're responsive to the subpoena, and I
04:01PM 5 was told that that was -- the lawyers will make
6 that decision.

7 Q Okay.

8 A And so insofar as that goes, I mean -- the reverse
9 of that is if they felt something wasn't
04:01PM 10 responsive, they would be "withholding" it.

11 Q Okay. I want to understand more about that.

12 A Yes.

13 Q So let's talk about that. To whom did you make
14 that inquiry?

04:02PM 15 A Eric McLeod.

16 Q And this is after your first deposition or when
17 was it in relationship to let's say your first
18 deposition?

04:02PM 19 A I believe it would have been before my first
20 deposition.

21 Q Before? Okay.

22 A But certainly before the second.

23 Q Maybe before the first and certainly before the
24 second?

04:02PM 25 A Yes.

1 Q And where did that -- where were you when you made
2 that inquiry?

3 A That was in the offices of Michael
4 Best & Friedrich.

04:02PM 5 Q Who else was present?

6 A There was a young attorney named Joe. I'm sorry.

7 Q Screnock?

8 MR. POLAND: Olson.

9 Q Joe Olson.

04:02PM 10 A But I quite honestly can't tell you for sure
11 whether he was there at the moment or not that I
12 asked that question.

13 Q Was either Foltz or Ottman there?

14 A No.

04:03PM 15 Q And how did you phrase the inquiry to Eric McLeod?

16 A I asked -- I said *This is everything that relates*
17 *to redistricting that came off of the Reinhart*
18 *computer and my E-mail. Who is going to decide*
19 *what is responsive and what isn't?*

04:03PM 20 Q Okay. What did he say?

21 A He said *We decide. We will decide that.*

22 Q Is there anything more to the conversation beyond
23 that?

24 A Yes.

04:03PM 25 Q Okay. Tell me about it.

1 A I asked a follow-up question. I asked *If you were*
2 *to not supply something that later was determined*
3 *that should have been supplied, who answers for*
4 *that, me or you as counsel?*

04:03PM 5 Q Okay. What did he say when you asked that?

6 A He said *That's why you have counsel*. He said
7 *We're responsible for that*.

8 Q Did you ask any further follow-up?

9 A No. I was satisfied at that point.

04:04PM 10 Q Did you ask him to give it to you in writing?

11 A No.

12 Q You should have. I'm kidding.

13 MS. BUCHKO: Are you threatening
14 the witness there, counsel?

04:04PM 15 MR. EARLE: No. I was joking.

16 That comment was made, for the transcript
17 purposes, for a little levity.

18 I'll withdraw that comment.

19 MS. BUCHKO: Okay.

04:04PM 20 Q Did you discuss that issue with anybody else other
21 than Eric McLeod?

22 A In that time period?

23 Q Yes.

24 A No.

04:04PM 25 Q Did you discuss that issue with anybody else after

1 that time period?

2 A Yes.

3 Q Who?

4 A The attorney. I'm sorry. I forget his name

04:04PM

5 from --

6 Q Pyper?

7 A Mr. Pyper.

8 Q And we won't ask you about the content of that
9 conversation since that would be privileged.

04:05PM

10 MS. BUCHKO: Thank you.

11 Q Joe, Mr. Handrick, I'm going to ask you whether
12 you have any knowledge of any unlawful conduct
13 with any of the three computers that were at
14 Michael Best.

04:05PM

15 MS. BUCHKO: Objection; form,
16 foundation, competency.

17 Q That's fine. Go ahead.

18 A Okay.

19 Q You can answer the question.

20 THE WITNESS: Would you repeat the
21 question.

22 A I thought your question was a statement.

23 (The following was read by the reporter:

24 Q "Joe, Mr. Handrick, I'm going to ask you

04:05PM

25 whether you have any knowledge of any unlawful

1 conduct with any of the three computers that
2 were at Michael Best."

3 A That was a statement. I'm waiting for your --

4 Q I'm going to ask you. I'm asking you whether you
04:06PM 5 have any knowledge.

6 MS. BUCHKO: Same objections.

7 Q I'm asking you whether you have any knowledge of
8 any unlawful conduct in which the three computers
9 at Michael Best played a part.

04:06PM 10 A All right.

11 MS. BUCHKO: Same objections.

12 A I'm sorry. I'm not trying to be difficult. I'm
13 trying to be precise. The answer is no.

14 Q Do you have any knowledge about anybody in the
04:06PM 15 redistricting process destroying documents in
16 order to avoid production of them?

17 A No.

18 Q I will rephrase -- I'm going to ask you a
19 different variation of the first of those
04:06PM 20 questions that I asked. Are you aware of any
21 misuse of the three computers that were located at
22 Michael Best?

23 MS. BUCHKO: Object to form,
24 foundation, competency.

04:07PM 25 A No.

1 MR. EARLE: Your witness.

2 EXAMINATION

3 By Mr. Poland:

4 Q Mr. Handrick, at the time that you used the
04:07PM 5 redistributing computer at Michael Best's offices,
6 was there also an external hard drive, disc drive,
7 attached to that computer?

8 A Not that I know of. I wouldn't know what one
9 looked like. Not that I know of.

04:07PM 10 Q Was there any kind of a sort of metal box about
11 the size of a tissue box that had a cable that was
12 hooked up to the computer?

13 A Not that I can recall.

04:07PM 14 Q Was there any backup system that you know about
15 that was backing up the contents of the
16 redistributing computer that you were working on?

17 A My memory is that LTSB backed up all three of
18 those computers, but I can't answer as to whether
19 that was on a network or whether they came and
04:08PM 20 physically did that to each one.

21 Q Did you ever access the Internet through your
22 redistributing computer?

23 A I tried.

04:08PM 24 Q That was when it was at Michael Best & Friedrich,
25 correct?

1 A Yes.

2 Q Did you succeed?

3 A No.

4 Q What did you try to do to access the Internet?

04:08PM

5 A I was curious one day because my memory was
6 failing me as to the exact boundaries of the
7 Lac Courte Oreilles reservation. So I wanted to
8 go find a map of the Lac Courte Oreilles
9 reservation. I had viewed that many times before

04:08PM

10 on their website. So I tried to find it on the
11 Internet.

12 Q And you couldn't connect to the Internet?

13 A I could connect, but a screen came up that said
14 *Michael Best & Friedrich has blocked you from this*
15 *type of website.*

04:09PM

16 Q Okay. Did you ever try to connect to any other
17 type of website through your redistricting
18 computer?

19 A Not that I recall.

04:09PM

20 Q Did you access any kind of web mail like MSN web
21 mail from the redistricting computer?

22 A Not that I recall.

23 Q It's your testimony here today then that you have
24 no recollection of any external hard drive that
25 was hooked up to your redistricting computer?

04:09PM

1 A That's correct.

2 Q And you certainly never operated or handled such
3 an external hard drive to your knowledge?

4 A Definitely not.

04:09PM 5 Q You testified in response to questions that
6 Mr. Earle asked you about documents that you
7 printed and gave to Mr. McLeod for production,
8 correct?

9 A Well, I didn't give them to him.

04:10PM 10 Q I thought you said you had a big stack of
11 documents that you --

12 A I produced them for Mr. McLeod. I think what I
13 testified was that I didn't actually deliver them.

04:10PM 14 Q All right. Fair enough. You had a big stack of
15 documents that you produced for Mr. McLeod, but
16 you weren't the one who physically handed them to
17 Mr. McLeod; is that correct?

18 A Correct.

04:10PM 19 Q And as you searched for documents that were
20 responsive to plaintiffs' subpoenas, you mentioned
21 that you did not exclude documents pertaining to
22 SB 150, correct?

23 A That is correct.

04:10PM 24 Q There's a stack of documents in front of you,
25 Mr. Handrick. They should be in number order with

1 the exhibit stickers, the yellow exhibit stickers.

2 I'm going to ask you to pull out what's been

3 marked as Exhibit No. 12 in that stack.

4 A Okay. I have No. 12 in front of me.

04:11PM

5 Q I would like you to take a look at the second page

6 of Exhibit No. 12. I don't know if you remember

7 this from your last deposition, but lawyers like

8 to use fancy names for things. We put these

9 numbers on the bottom of the documents, and we

04:11PM

10 call them Bates stamps. The second page you will

11 see in the lower right-hand corner is Bates No.

12 Evans 000108. Do you see that?

13 A Yes.

14 Q I would like you to look at the top of that page.

04:11PM

15 Do you see that there is an E-mail there. It's

16 from you and it's going to Mr. Taffora,

17 Mr. Ottman, Mr. Foltz, and Mr. Troupis on July 18,

18 2011. Do you see that?

19 A Yes.

04:11PM

20 Q Now, I will represent to you that this is an

21 E-mail that was not produced to the plaintiffs in

22 the litigation. All right? Is this a document

23 that you believe you printed out and was provided

24 to Mr. McLeod as part of the document production

04:12PM

25 process?

1 A No. I believe this is a document that would have
2 been pulled off of the Reinhart computer doing
3 their search.

04:12PM

4 Q So you believe that the search that was conducted
5 on Reinhart's own E-mail system would have snagged
6 this document or located this document and that
7 would have been printed and provided to
8 Mr. McLeod?

9 A Yes.

04:12PM

10 Q Have you seen that particular E-mail before?

11 A Yes.

12 Q You saw it on or about the date that you sent it?

13 A Yes. I would have seen it on the day I wrote it.

14 Q Did you see it after the day that you wrote it?

04:12PM

15 A Yes.

16 Q When did you see it after the day that you wrote
17 it?

18 A Last Friday.

19 Q Who showed it to you last Friday?

04:12PM

20 A My counsel.

21 Q I would like to turn your attention to -- I think
22 on these there's no distinction between individual
23 documents, so it might be a little bit difficult.

24 Let me do this: I would like you to just page

04:13PM

25 through Exhibit No. 12 --

1 A Okay.

2 Q -- and identify for me documents that you don't
3 believe were provided to Michael Best & Friedrich
4 by Reinhart as part of the document production.

04:13PM 5 A Documents I don't believe.

6 Q Correct. Documents that you do not believe were
7 provided to Michael Best & Friedrich by Reinhart
8 as part of the document production process.

04:15PM 9 A The document on the front page, counselor, on
10 Evans 000112 -- I would have no reason to believe
11 that that document would have been picked up by
12 the Reinhart document search. Counselor, Evans
13 000117. That looks like that might be the same
14 document, but I don't believe that would have been

04:15PM 15 picked up by the Reinhart document search. That
16 same document appears to be reproduced on 000122.
17 I'm on Evans 000123. Counselor, the E-mail at the
18 top to Ray Taffora from Jim Troupis -- I don't
19 believe that would have been picked up by the

04:16PM 20 Reinhart document search. The same goes for the
21 E-mail at the bottom of that page. On the next
22 page, 00124. Rodriguez E-mail I do not believe
23 would have been picked up by the Reinhart document
24 search. 000127 also an E-mail. I don't see

04:17PM 25 anything that would indicate that that would have

1 been picked up by Reinhart in its document search.
2 000129. There are two messages there. I don't
3 believe either would have been picked up by the
4 Reinhart document search. On the bottom of 000131
04:18PM 5 there's a repeat of one I already identified.
6 Counselor, at the top of 000133 E-mail Troupis to
7 Taffora. That would not have been picked up by
8 the Reinhart document search. 135. Again,
9 there's one, a repeat. 136 is an E-mail that I
04:19PM 10 don't believe Reinhart's search would have picked
11 up. Same goes for the E-mail on 137. On 145 --
12 there are E-mails there I don't believe would have
13 been picked up by the Reinhart search. On 147
14 there's what appears to be a string of E-mails
04:20PM 15 that I don't believe would have been picked up by
16 the Reinhart search. On 156 there's again a
17 repeat of an E-mail that I don't believe would
18 have been picked up by that search.

19 Q Other than the documents you have identified
04:21PM 20 specifically by their Bates number, you would have
21 expected the other documents to have been picked
22 up by the Reinhart search and provided to Michael
23 Best & Friedrich as part of the document
24 production process?

04:21PM 25 MR. JACOB: Objection, form and

1 foundation.

2 A Yes.

3 Q Are there any other documents other than what you
4 have identified for Mr. Earle by category and what
04:21PM 5 we have just been through that you were aware of
6 that were located either on your own search for
7 documents as part of the production process in the
8 litigation or identified by the Reinhart law firm
9 from your files on their system that related to
04:22PM 10 redistricting and were provided to Michael
11 Best & Friedrich but were not produced to
12 plaintiffs?

13 A I'm not aware of any.

14 Q When you were engaged to work with Michael
04:22PM 15 Best & Friedrich in the redistricting process in
16 2011, were you told that that engagement was going
17 to be subject to an attorney-client privilege?

18 A Yes.

19 Q Were you told that there was also some kind of
04:22PM 20 privilege relating to anticipated litigation?

21 A That I don't recall.

22 Q Do you recall ever being told that litigation was
23 possible over redistricting?

24 A My memory is that the litigation had already
04:23PM 25 started so yes I was aware that there would be.

1 Q I'm going to ask you if you could take a look at
2 Exhibit No. 9 that's in front of you. It might be
3 somewhere in the stack. Do you have that in front
4 of you, Mr. Handrick?

04:23PM

5 A Yes.

6 Q Do you see this was a document we had actually
7 marked back at your deposition in 2012? Do you
8 see this is an E-mail that was sent from
9 Mr. Troupis to a number of people and you were
10 copied on it, correct?

04:23PM

11 A Yes.

12 Q You see up at the top it states Attorney Client
13 Privilege Litigation Preparation? Do you see
14 that?

04:23PM

15 A Yes.

16 Q Were you ever told what that means, Attorney
17 Client Privilege Litigation Preparation?

18 A No.

19 Q Were you ever instructed to retain and not discard
20 any of the materials that you had relating to
21 redistricting?

04:24PM

22 A Are we now in the time frame of my consultation at
23 Michael Best?

24 Q We are in the time frame of your -- yes.

04:24PM

25 A During that time frame? No.

1 Q When was the first time you were instructed as
2 part of the redistricting process or the
3 litigation that you should not discard and you
4 should retain documents?

04:24PM

5 A By the Reinhart attorneys at around the time of my
6 depositions.

7 Q And that would have been in approximately December
8 of 2011?

9 A Yes.

04:24PM

10 MR. POLAND: I think I'm finished.

11 MS. LAZAR: I have no questions.

12 EXAMINATION

13 By Mr. Jacob:

14 Q Mr. Handrick --

04:24PM

15 A When you did introduce yourself before, I didn't
16 even catch it.

17 Q That's okay.

18 MR. EARLE: He's the lawyer for
19 Michael Best.

04:25PM

20 Q And an individual with a name.

21 A You may have gathered I have a little trouble with
22 retaining names.

23 Q My name is Ayad Jacob. I am representing Michael
24 Best.

04:25PM

25 Mr. Handrick, did you at any point discard or

1 delete any documents relating to redistricting?

2 A As I stated before, I never deleted anything from
3 that computer.

4 Q From the computer. The computer you're referring
04:25PM 5 to is the computer at Michael Best and the
6 computer you used at Michael Best, the
7 redistricting computer?

8 A Correct.

9 Q And the only other computer that you're referring
04:25PM 10 to is your Reinhart computer?

11 A Correct.

12 Q Now, earlier you had testified that there was a
13 Reinhart or what you referred to as a Reinhart
14 document search. Could you tell me who conducted
04:26PM 15 that search again.

16 A It was conducted by the IT department.

17 Q Do you recall specifically whom?

18 A No. I don't.

19 Q And they conducted this search based on search
04:26PM 20 terms or just individuals that you corresponded
21 with?

22 A My understanding is that they did it based on
23 search terms and subject lines as well as to or
24 from any individuals that I would have worked with
04:26PM 25 redistricting on.

1 Q And they then compiled the results of the search?

2 A Yes.

3 Q And did you review their search results prior to
4 it being provided to Eric McLeod?

04:27PM

5 A I do not recall reviewing the Reinhart search
6 results.

7 Q So you cannot say whether -- let's back up. You
8 did not review the search results, the documents
9 that resulted from the Reinhart document search,
10 and you did not provide those documents directly
11 to Eric McLeod; is that correct?

04:27PM

12 A That's correct.

13 Q So you have no knowledge regarding the specific
14 documents provided to Eric McLeod, do you?

04:27PM

15 A That would be correct.

16 Q So as you sat here today and Mr. Poland was going
17 to specific documents that would have been
18 provided to Michael Best, you have no way of
19 saying whether those documents were in fact
20 provided, correct?

04:28PM

21 MS. BUCHKO: Object to form.

22 A I would have no way of literally knowing whether
23 they were. That's correct.

24 Q Because you didn't review the search results that
25 Reinhart conducted and you didn't provide the

04:28PM

1 actual documents to Michael Best, correct?

2 A That's correct.

3 MR. JACOB: That's all.

4 MS. BUCHKO: I just have a couple

04:29PM

5 of quick questions.

6 EXAMINATION

7 By Ms. Buchko:

8 Q Mr. Handrick, I want to talk only about the
9 computer that you used that was in the Michael
10 Best & Friedrich offices for redistricting. Okay?

04:29PM

11 When you were present working on that computer,
12 did you ever have occasion to see staff from the
13 Legislative Technology Services Bureau performing
14 any sort of service or maintenance on that
15 computer?

04:29PM

16 A No.

17 Q Are you aware of whether they did perform any
18 service or maintenance on that computer?

19 A Yes.

04:29PM

20 Q What are you aware of them doing?

21 A On occasion, maybe a couple of times, something
22 wouldn't work right so I would let the other guys
23 know something wasn't working right, and then they
24 would put in a request to LTSB to get it fixed.

04:30PM

25 Q Do you know whether or not LTSB from the time you

1 started using the computer at Michael
2 Best & Friedrich through the time of the enactment
3 of Acts 43 and 44 -- if they ever had occasion to
4 update the software or the data that was on that
04:30PM 5 computer?

6 A If they did, I'm not aware of it.

7 MS. BUCHKO: Okay. That's all I've
8 got.

9 MS. LAZAR: No questions.

04:30PM 10 MR. EARLE: Thanks, Joe.

11 MR. POLAND: We're done.

12 THE VIDEOGRAPHER: We're going off
13 the record. This concludes the video
14 deposition of Mr. Joseph Handrick. The time
04:30PM 15 is 4:29 p.m.

16 (Adjourning at 4:30 p.m.)

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1 STATE OF WISCONSIN)
2 COUNTY OF DANE) ss.

3 I, SUSAN C. MILLEVILLE, a Court Reporter
4 and Notary Public duly commissioned and qualified in
5 and for the State of Wisconsin, do hereby certify
6 that pursuant to subpoena, there came before me on
7 the 30th day of April 2013, at 3:21 in the afternoon,
8 at the offices of Godfrey & Kahn, S.C., Attorneys at
9 Law, One East Main Street, the City of Madison,
10 County of Dane, and State of Wisconsin, the following
11 named person, to wit: JOSEPH W. HANDRICK, who was by
12 me duly sworn to testify to the truth and nothing but
13 the truth of his knowledge touching and concerning
14 the matters in controversy in this cause; that he was
15 thereupon carefully examined upon his oath and his
16 examination reduced to typewriting with
17 computer-aided transcription; that the deposition is
18 a true record of the testimony given by the witness.

19 I further certify that I am neither
20 attorney or counsel for, nor related to or employed
21 by any of the parties to the action in which this
22 deposition is taken and further that I am not a
23 relative or employee of any attorney or counsel
24 employed by the parties hereto or financially
25 interested in the action.

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In witness whereof I have hereunto set my
hand and affixed my notarial seal this 4th day of May
2013.

Notary Public, State of Wisconsin

My commission expires
June 23, 2013

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SAO88 (Rev. 12/07) Subpoena in a Civil Case

**Issued by the
UNITED STATES DISTRICT COURT
Eastern District of Wisconsin**

ALVIN BALDUS, et al.

SUBPOENA IN A CIVIL CASE

V.

Members of the Wisconsin Government Accountability Board,
each only in his official capacity: MICHAEL BRENNAN, et al.

Case Number:¹ 11-CV-562-JPS

TO: Joseph Handrick
Department of Workforce Development
201 East Washington Avenue
Madison, WI 53707

YOU ARE COMMANDED to appear in the United States District court at the place, date, and time specified below to testify in the above case.

PLACE OF TESTIMONY	COURTROOM
	DATE AND TIME

YOU ARE COMMANDED to appear at the place, date, and time specified below to testify at the taking of a deposition in the above case. The deposition will be recorded by stenographic and audiovisual means.

PLACE OF DEPOSITION GODFREY & KAHN, S.C. One East Main Street, Suite 500, Madison, WI 53703, Ph: (608) 257-3911	DATE AND TIME 4/30/2013 3:00 pm
---	------------------------------------

YOU ARE COMMANDED to produce and permit inspection and copying of the following documents or objects at the place, date, and time specified below (list documents or objects):

PLACE	DATE AND TIME
-------	---------------

YOU ARE COMMANDED to permit inspection of the following premises at the date and time specified below.

PREMISES	DATE AND TIME
----------	---------------

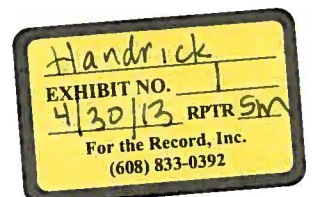
Any organization not a party to this suit that is subpoenaed for the taking of a deposition shall designate one or more officers, directors, or managing agents, or other persons who consent to testify on its behalf, and may set forth, for each person designated, the matters on which the person will testify. Federal Rule of Civil Procedure 30(b)(6).

ISSUING OFFICER'S SIGNATURE AND TITLE (INDICATE IF ATTORNEY FOR PLAINTIFF OR DEFENDANT) Counsel for Plaintiffs, Alvin Baldus, et al.	DATE 4/22/2013
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ISSUING OFFICER'S NAME, ADDRESS AND PHONE NUMBER
Attorney Douglas M. Poland, GODFREY & KAHN, S.C., One East Main Street, Suite 500, Madison, WI 53703,
Telephone: (608) 284-2625, Email: dpoland@gklaw.com, Counsel for Plaintiffs, Alvin Baldus, et al.

(See Federal Rule of Civil Procedure 45 (c), (d), and (e), on next page)

¹ If action is pending in district other than district of issuance, state district under case number.



AO88 (Rev. 12/07) Subpoena in a Civil Case (Page 2)

PROOF OF SERVICE

DATE	PLACE
SERVED	
SERVED ON (PRINT NAME)	MANNER OF SERVICE
SERVED BY (PRINT NAME)	TITLE

DECLARATION OF SERVER

I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Proof of Service is true and correct.

Executed on _____ DATE _____ SIGNATURE OF SERVER _____

ADDRESS OF SERVER _____

Federal Rule of Civil Procedure 45 (c), (d), and (e), as amended on December 1, 2007:

(c) PROTECTING A PERSON SUBJECT TO A SUBPOENA.

(1) **Avoiding Undue Burden or Expense; Sanctions.** A party or attorney responsible for issuing and serving a subpoena must take reasonable steps to avoid imposing undue burden or expense on a person subject to the subpoena. The issuing court must enforce this duty and impose an appropriate sanction — which may include lost earnings and reasonable attorney’s fees — on a party or attorney who fails to comply.

(2) Command to Produce Materials or Permit Inspection.

(A) **Appearance Not Required.** A person commanded to produce documents, electronically stored information, or tangible things, or to permit the inspection of premises, need not appear in person at the place of production or inspection unless also commanded to appear for a deposition, hearing, or trial.

(B) **Objections.** A person commanded to produce documents or tangible things or to permit inspection may serve on the party or attorney designated in the subpoena a written objection to inspecting, copying, testing or sampling any or all of the materials or to inspecting the premises — or to producing electronically stored information in the form or forms requested. The objection must be served before the earlier of the time specified for compliance or 14 days after the subpoena is served. If an objection is made, the following rules apply:

(i) At any time, on notice to the commanded person, the serving party may move the issuing court for an order compelling production or inspection.

(ii) These acts may be required only as directed in the order, and the order must protect a person who is neither a party nor a party’s officer from significant expense resulting from compliance.

(3) Quashing or Modifying a Subpoena.

(A) **When Required.** On timely motion, the issuing court must quash or modify a subpoena that:

- (i) fails to allow a reasonable time to comply;
- (ii) requires a person who is neither a party nor a party’s officer to travel more than 100 miles from where that person resides, is employed, or regularly transacts business in person — except that, subject to Rule 45(c)(3)(B)(iii), the person may be commanded to attend a trial by traveling from any such place within the state where the trial is held;
- (iii) requires disclosure of privileged or other protected matter, if no exception or waiver applies; or
- (iv) subjects a person to undue burden.

(B) **When Permitted.** To protect a person subject to or affected by a subpoena, the issuing court may, on motion, quash or modify the subpoena if it requires:

- (i) disclosing a trade secret or other confidential research, development, or commercial information;
- (ii) disclosing an unretained expert’s opinion or information that does not describe specific occurrences in dispute and results from the expert’s study that was not requested by a party; or
- (iii) a person who is neither a party nor a party’s officer to incur substantial expense to travel more than 100 miles to attend trial.

(C) **Specifying Conditions as an Alternative.** In the circumstances described in Rule 45(c)(3)(B), the court may, instead of quashing or modifying a subpoena, order appearance or production under specified conditions if the serving party:

- (i) shows a substantial need for the testimony or material that cannot be otherwise met without undue hardship; and
- (ii) ensures that the subpoenaed person will be reasonably compensated.

(d) DUTIES IN RESPONDING TO A SUBPOENA.

(1) **Producing Documents or Electronically Stored Information.** These procedures apply to producing documents or electronically stored information:

(A) **Documents.** A person responding to a subpoena to produce documents must produce them as they are kept in the ordinary course of business or must organize and label them to correspond to the categories in the demand.

(B) **Form for Producing Electronically Stored Information Not Specified.** If a subpoena does not specify a form for producing electronically stored information, the person responding must produce it in a form or forms in which it is ordinarily maintained or in a reasonably usable form or forms.

(C) **Electronically Stored Information Produced in Only One Form.** The person responding need not produce the same electronically stored information in more than one form.

(D) **Inaccessible Electronically Stored Information.** The person responding need not provide discovery of electronically stored information from sources that the person identifies as not reasonably accessible because of undue burden or cost. On motion to compel discovery or for a protective order, the person responding must show that the information is not reasonably accessible because of undue burden or cost. If that showing is made, the court may nonetheless order discovery from such sources if the requesting party shows good cause, considering the limitations of Rule 26(b)(2)(C). The court may specify conditions for the discovery.

(2) Claiming Privilege or Protection.

(A) **Information Withheld.** A person withholding subpoenaed information under a claim that it is privileged or subject to protection as trial-preparation material must:

- (i) expressly make the claim; and
- (ii) describe the nature of the withheld documents, communications, or tangible things in a manner that, without revealing information itself privileged or protected, will enable the parties to assess the claim.

(B) **Information Produced.** If information produced in response to a subpoena is subject to a claim of privilege or of protection as trial-preparation material, the person making the claim may notify any party that received the information of the claim and the basis for it. After being notified, a party must promptly return, sequester, or destroy the specified information and any copies it has; must not use or disclose the information until the claim is resolved; must take reasonable steps to retrieve the information if the party disclosed it before being notified; and may promptly present the information to the court under seal for a determination of the claim. The person who produced the information must preserve the information until the claim is resolved.

(e) CONTEMPT.

The issuing court may hold in contempt a person who, having been served, fails without adequate excuse to obey the subpoena. A nonparty’s failure to obey must be excused if the subpoena purports to require the nonparty to attend or produce at a place outside the limits of Rule 45(c)(3)(A)(ii).

Godfrey & Kahn, S.C.
One East Main Street
Madison, WI 53703

04-22-2013 HANDRICK, JOSEPH

58522

058522

DATE	INVOICE #	CLIENT / MATTER #	GL # / DESCRIPTION	AMOUNT
04-22-13	13042203	010175-0001	WITNESS/MILEAGE FEE	41.13

GODFREY & KAHN S.C.

Godfrey & Kahn, S.C.
One East Main Street
Madison, WI 53703

DETACH AND RETAIN THIS STATEMENT
THE ATTACHED CHECK IS IN PAYMENT OF ITEMS DESCRIBED BELOW.
IF NOT CORRECT, PLEASE NOTIFY US PROMPTLY, NO RECEIPT DESIRED.

58522

058522

DATE	INVOICE #	CLIENT / MATTER #	GL # / DESCRIPTION	AMOUNT
04-22-13	13042203	010175-0001	WITNESS/MILEAGE FEE	41.13

GODFREY & KAHN S.C.

THE BACK OF THIS DOCUMENT CONTAINS AN ARTIFICIAL WATERMARK - HOLD AT AN ANGLE TO VIEW

GODFREY & KAHN S.C.

058522

One East Main Street
Madison, WI 53703

M&I MARSHALL & ILSLEY BANK
MILWAUKEE, WI 53202

12-5
750

VOID AFTER 90 DAYS

PAY

FORTY-ONE AND 13/100

DATE

AMOUNT

04-22-2013

\$ 41.13

TO
THE
ORDER
OF

JOSEPH HANDRICK
DEPARTMENT OF WORKFORCE DEVELOPMENT
201 EAST WASHINGTON AVENUE
MADISON, WI 53707

Joseph Handrick

AUTHORIZED SIGNATURE

⑈058522⑈ ⑆07500005⑆ 00122⑈63064⑈