UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION

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NAACP PLAINTIFFS' OPPOSITION TO DEFENDANTS' MOTION TO EXCLUDE DR. LAFLEUR STEPHENS-DOUGAN'S EXPERT REPORT

CERTICATE OF SERVICE

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EXHIBIT 1

Excerpts of April 14, 2023 Deposition of Dr. LaFleur Stephens-Dougan

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION

TERRY PETTEWAY, et al., Plaintiffs, v. GALVESTON COUNTY, TEXAS, et al., Defendants.	:	Civil Action No. 3:22-CV-00057 (Consolidated)
UNITED STATES OF AMERICA, Plaintiff, v. GALVESTON COUNTY, TEXAS, et al., Defendants.	:	Civil Action No. 3:22-CV-00093
DICKINSON BAY AREA BRANCH NAACP, et al., Plaintiffs, v. GALVESTON COUNTY, TEXAS, et al., Defendants.	:	Civil Action No. 3:22-CV-00117

VIDEO-RECORDED, VIDEOCONFERENCED DEPOSITION OF
LAFLEUR STEPHENS-DOUGAN, PhD

DATE: April 14, 2023
TIME: 11:01 a.m. to 5:55 p.m.
LOCATION: Witness Location
Princeton, New Jersey

Reported by: Shawna Hum Browne, RMR, CRR, CCR

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ALSO PRESENT:

Jake Franks, Video Technician
Victoria Varner, Videographer
Elizabeth Holcombe, Paralegal, Holtzman Vogel

English major.

Q. Okay. What made you change your mind over to politics?

A. I didn't like classics.

Q. There you go. I was an American studies undergrad, and same thing there. I focused heavy on American political history for my degree.

Now what experience do you have with Texas State politics?

A. Can you -- what do you mean by that?

Q. Have you been involved in Texas State politics in any way?

A. No.

Q. What about local politics within Galveston County?

A. I have not been involved in local politics in Galveston County.

Q. And I take it from your earlier explanation of your professional background, you've never taught at a university in the state of Texas; correct?

A. No. But I am an expert in American politics and public opinion.

Q. I understand that. I'm not trying to say otherwise.

But you've never taught in Texas; correct?

when you're there.

A. I'm here.

Q. It says "While the primary purpose of this report is to provide an account of the academic consensus on the relationship between race and partisan politics in America, particularly in the American South, rather than a comprehensive study of Galveston County specifically."

Is that an accurate representation of the emphasis you were asked -- you were retained to provide in this case as far as your research?

A. Are you asking if what I stated is accurate?

Q. Yes.

A. Yes.

Q. Approximately how much time did you spend researching and writing specifically on Galveston County versus the time spent researching or writing on kind of the broader national and southern trends? If you could break it down maybe by a percentage that adds up to 100.

A. I'm trying to recall. I would say about 20 to 25 percent.

Q. Was Galveston-specific?

A. Yes.

Q. Okay. And you rely on a number of polling -- various polls throughout your report. Would you agree that that polling is based off of national or southern polling generally?

MR. GONZALEZ: Objection. Form. But go ahead.

THE WITNESS: I rely on many different polls, but often they are nationally representative samples, so polls that are meant to reflect the population of the United States.

BY MR. HOLT:

Q. Okay. There was no Galveston County-specific polling that you relied on here; correct?

A. No. But it's pretty uncommon for there to be polls conducted at, you know, such a specific local level.

Q. Okay. And there was no Texas-specific polling that you relied on?

A. No.

Q. Now, what are your expert opinions that you arrived at in this case?

A. Could you be more specific?

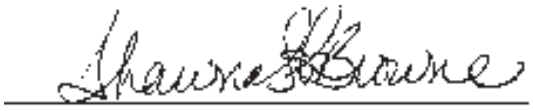
Q. Just generally, what are the opinions that you arrived at? What are the conclusions you arrived

COMMONWEALTH OF VIRGINIA AT LARGE, to wit:

I, Shawna Hum Browne, RMR, CRR, CCR, and eNotary Public for the Commonwealth of Virginia at large, whose commission expires August 31, 2026, do certify that the aforementioned appeared before me via videoconference, was sworn by me, and was thereupon examined by counsel; and that the foregoing is a true, correct, and full transcript of the testimony adduced.

I further certify that I am neither related to nor otherwise associated with any counsel or party to this proceeding, nor otherwise interested in the event thereof.

IN WITNESS WHEREOF, I have hereunto set my hand and affixed my notarial seal this 17th day of April 2023.



_____

Shawna Hum Browne

Electronic Notary Public, #302535

Commonwealth of Virginia at Large

EXHIBIT 2

Excerpts of April 11, 2023 Deposition of Dr. Kassra Oskooii

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION

TERRY PETTEWAY, et al., Plaintiffs, v. GALVESTON COUNTY, TEXAS, Defendants.	:	Civil Action No. 3:22-CV-00057 (Consolidated)
UNITED STATES OF AMERICA, Plaintiffs, v. GALVESTON COUNTY, TEXAS, et al., Defendants.	:	Civil Action No. 3:22-CV-00093
DICKINSON BAY AREA BRANCH NAACP, et al., Plaintiffs, v. GALVESTON COUNTY, TEXAS, et al., Defendants.	:	Civil Action No. 3:22-CV-00117

VIDEOCONFERENCE DEPOSITION OF KASSRA A.R. OSKOOII

DATE: April 11, 2023
TIME: 10:00 a.m. to 5:01 p.m.
LOCATION: Witness Location
Wilmington, Delaware

REPORTED BY: Felicia A. Newland, CSR

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Amber Hulse, Law Clerk, Holtzman Vogel
Sharon Norwood, Holtzman Vogel
Michael Rios, Expert
Brittany Wake

sometimes factors may come out that say it's not so probative. So am I understanding your testimony correctly?

A Sorry. What was the question?

Q Okay. We can go back to paragraph 7. So you continue saying, "The racial makeup of the candidates is telling in this instance as to the interconnectedness of race and partisanship in this jurisdiction and is consistent with what one might expect from a region where there is a high degree of racially polarized voting."

Did I read that correctly?

A Yes.

Q Okay. Now, you don't cite an academic journal to support this inference that you're making, correct?

A I provided the data and analysis that I conducted here to draw that inference.

Q But you don't have -- you don't cite an academic journal to support the inference that you're drawing, correct?

MR. GONZALEZ: Objection. Form.

THE WITNESS: Could you clarify please what specific inference here that you're asking about?

BY MR. SHEEHY:

Q You say that, "It is the interconnectedness of race and partisanship in this jurisdiction and is consistent with what one might expect from a region where there's a high degree of racially polarized voting."

So I guess I'll ask it this way: Is there consensus within the political science community that would support this inference that you are making?

A That there is an interconnectedness between race and partisanship?

Q Yes.

A I would say that there is literature -- great deal of literature and research such as saying that race and partisanship are interconnected, yes.

Q Okay. And is there scholarship in the political science community that analyzes -- or

not analyzes, but proposes how one can differentiate between racial reasons in voting as opposed to partisan reasons in voting?

MR. GONZALEZ: Objection. Form.

THE WITNESS: You're asking me if such research is out there?

BY MR. SHEEHY:

Q Yes.

A There is -- again, there is research on the relationship between race and partisanship, yes, there is.

Q And is there research distinguishing between when someone is casting a ballot for racial reasons as opposed to casting a ballot for partisan reasons?

MR. GONZALEZ: Objection. Form.

THE WITNESS: I can only answer questions about what I presented here. If you're asking me if such research potentially exists, then I would have to conduct a literature review of that specific topic to tell you more details.

CERTIFICATE OF NOTARY PUBLIC

I, FELICIA A. NEWLAND, CSR, the officer before whom the foregoing videotaped deposition was taken, do hereby certify that the witness whose testimony appears in the foregoing deposition was duly sworn by me; that the testimony of said witness was taken by me in stenotype and thereafter reduced to typewriting under my direction; that said deposition is a true record of the testimony given by said witness; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this deposition was taken; and, further, that I am not a relative or employee of any counsel or attorney employed by the parties hereto, nor financially or otherwise interested in the outcome of this action.

_____

FELICIA A. NEWLAND, CSR

Notary Public

My commission expires:

September 15, 2024

EXHIBIT 3

Excerpts of April 27, 2023 Deposition of Dr. John R. Alford

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION

HONORABLE TERRY PETTEWAY, et al., Plaintiffs,	)	
VS.	)	CASE NO. 3:22-cv-00057
GALVESTON COUNTY, et al., Defendants.	)	

ORAL, VIDEOTAPED AND VIDEOCONFERENCED
DEPOSITION OF
JOHN R. ALFORD, PhD
April 27, 2023
VOLUME 1
(Reported remotely in Denton County, Texas)

ORAL, VIDEOTAPED AND VIDEOCONFERENCED DEPOSITION OF JOHN R. ALFORD, PhD, produced as a witness at the instance of the Petteway Plaintiffs, was taken in the above-styled and numbered cause on April 27, 2023, from 9:13 a.m. to 12:08 p.m., before Jamie K. Israelow, Certified Shorthand Reporter in and for the State of Texas, Registered Merit Reporter and Certified Realtime Reporter, reported by machine shorthand, with the witness appearing remotely in the City of League City, County of Galveston and State of Texas, and the provisions stated on the record or attached hereto; that the deposition shall be read and signed before any notary public.

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Hilary Klein, Esq.
Mateo Forero, Esq.
Toby Moore

And I don't want to disappoint you, so I am going to ask you previously about some of your academic work.

And I will pull up -- I'll share it in the chat.

All right. I just shared one of your papers in the chat. Did that come through?

MS. OLALDE: Is that just his CV?

MR. GONZALEZ: Pardon?

MS. OLALDE: I apologize. Let me save --

Okay. There you go.

THE WITNESS: I am seeing that.

MR. GONZALEZ: Okay. And I will also share my screen.

(Counsel displays document.)

Q. (By Mr. Gonzalez) So this is a paper you authored, entitled "Are Political Orientations Genetically Transmitted?"

A. That's correct.

Q. And do you recall this paper, more or less?

A. I do.

Q. So just a couple of questions. Please correct me if I'm mischaracterizing this, but just broadly speaking, in layman's terms, you were looking at survey responses from sets of identical twins and sets of maternal twins to determine what role genetic

heritability might play in the formation of political orientations; is that right?

A. That's a very fair summary.

Q. All right. So looking at the first page here -- if I can find it. Here on this first paragraph, under Attitude Formation, you write: Survey responses to political items presumably reflect attitudes and are thought to be a combination of longstanding "predispositions" and more recent "off-the-top-of-the-head" considerations.

Did I read that correctly?

A. That's correct.

Q. Just considering the first part of that sentence, "survey responses to political items presumably reflect attitudes," is -- do you agree with that statement today?

A. Yes.

Q. And are surveys one of the standard tools that political scientists use to measure political attitudes?

A. Yes.

Q. And so in this paper, you were looking primarily at survey responses from twins in Virginia; is that right?

A. Primarily based on the -- what's called the VA30K, which involves Virginia, but other states on the

mid-Eastern Seaboard, and then there's also some information from an Australian twin study.

Q. Okay. So twins in, sort of, the Atlantic region and some in Australia?

A. Yeah. My recollection is -- I could be wrong; it's been a few years -- but that it's actually the Mid-Atlantic Twin Registry that the sample is drawn from.

Q. All right. And in the paper, though, you're drawing general insights about the heritability of political attitudes for everybody, not just twins in the Mid-Atlantic Region; is that right?

A. That's correct.

Q. And is it standard within political science to rely on representative samples to make observations about groups?

A. Yes.

Q. All right. I'm going to go down to Page 160 here. And I'll give you just a moment to look at Table 2, just to sort of refresh your memory about contents.

A. Yes.

Q. And then going further down, you say: Party affiliation is the most clearly political of the items in the broader questionnaire, and it is useful here on

So, again, when we talk about polarized voting in the United States with regard to partisan polarization, I certainly don't believe "partisan polarization" is ever used to describe a situation where 50% + 1 of the Democrats vote one way and 50% + 1 of Republicans vote the other. That would be the almost complete absence of either cohesion or polarization. We reserve --

Q. You didn't -- oh, sorry.

A. We reserve "polarization" to indicate things being at polar positions -- that is, at the north and the south -- not at the equator.

Q. You didn't conduct any analysis to determine whether voter -- individual voters in Galveston identify as Republican or Democrat; is that right?

A. That's correct. No one did any of that work.

Q. So you -- other than the actual vote choices, you don't know whether self-identified Democrats are voting for Democratic candidates or self-identified Republicans are voting for Republican candidates, right?

A. It depends on what you mean by "know."

Q. You didn't analyze that, right? You just said you didn't -- you don't have any data on who identifies.

A. I have no Galveston County-specific data on party identification voting.

We do have enormous and lengthy information about the role of party in voting in the United States. And if -- if it is not the case that the overwhelming majority of Republicans are voting Republican and Democrats are voting Democrat in Galveston County, it would be the only place we've ever seen where that's true in modern American elections.

So I have some information about it. I don't have empirical data that comes directly from Galveston County.

Q. I guess what I'm getting at is this: When you say -- because you just said "partisan polarization" means that Democratic voters are voting for Democrats, and Republicans are voting for Republicans. But nowhere in your report do you provide any analysis that says that that is what is happening in Galveston County, correct?

A. The -- so we do have evidence -- sorry. We do have evidence about voting in Galveston County in about the -- the -- what do you call? -- polarization evidence. Obviously, if -- if you're correct, at least, in your implication, which is without data, about the individual voting, we wouldn't be able to reach that conclusion. Then we could no more reach that conclusion about partisans than we could about ethnic groups.

IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION

HONORABLE TERRY PETTEWAY, et al., Plaintiffs,	)	
VS.	)	CASE NO. 3:22-cv-00057
GALVESTON COUNTY, et al., Defendants.	)	

REPORTER'S CERTIFICATION OF THE ORAL, VIDEOTAPED AND VIDEOCONFERENCED DEPOSITION OF

JOHN R. ALFORD, PHD

April 27, 2023

I, Jamie K. Israelow, a Certified Shorthand Reporter duly commissioned and qualified in and for the State of Texas, Registered Merit Reporter and Certified Realtime Reporter, do hereby certify to the following:

That the witness, JOHN R. ALFORD, PHD, was duly sworn by the officer and that the transcript of the oral deposition is a true record of the testimony given by the witness:

That the original transcript was delivered to Simone Leeper, Esq.

That a copy of the certificate was served on all parties and/or the witness shown herein on _____.

I further certify that pursuant to FRCP Rule 30(f)(1) that the signature of the deponent:

_X_ was requested by the deponent or a party before the completion of the deposition and that signature is to be before any notary public and returned within 30 days from date of receipt of the transcript. If returned, the attached Changes and Signature Page contains any changes and the reasons therefor;

___ was not requested by the deponent or a party before the completion of the deposition.

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

That the amount of time used by each party at the deposition is as follows:

Simone Leeper, Esq. - 0:31
Bernadette Reyes, Esq. - 0:00
Alexandra Cooper, Esq. - 0:00
Tharuni Jayaraman, Esq. - 1:15
K'Shaani Smith, Esq. - 0:00
Catherine Meza, Esq. - 0:00
Bruce Gear, Esq. - - 0:00
Joaquin Gonzalez, Esq. - 0:30
Angie Olalde, Esq. - 0:00
Joseph R. Russo, Jr., Esq. - 0:00
Jordan Raschke Elton, Esq. - 0:00

That pursuant to information given to the deposition officer at the time said testimony was taken, the following includes counsel for all parties of record:

Simone Leeper, Esq., Bernadette Reyes, Esq. And Alexandra Cooper, Esq., Attorneys for Pettaway Plaintiffs.

Tharuni Jayaraman, Esq., K'Shaani Smith, Esq. Catherine Meza, Esq., Bruce Gear, Esq., Attorneys for the Plaintiff United States.

Angie Olalde, Esq., Joseph R. Russo, Jr., Esq. and Jordan Raschke Elton, Esq., Attorneys for Defendants.

CERTIFIED TO BY ME on this _____ day of _____, 2023.

Jamie K. Israelow

_____

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