

IN THE CIRCUIT COURT OF COLE COUNTY  
STATE OF MISSOURI

CLARA FAATZ, et al.,	)	
Plaintiffs,	)	
v.	)	Case No. 22AC-CC03185
JOHN R. ASHCROFT, in his official capacity	)	
as Missouri Secretary of State,	)	
et al.,	)	
Defendants.	)	

**PLAINTIFF WILLIAM CALDWELL’S SUPPLEMENTAL RESPONSE TO  
DEFENDANT MISSOURI SECRETARY OF STATE JOHN R. ASHCROFT’S  
FIRST SET OF INTERROGATORIES**

Plaintiff William Caldwell submits this supplemental response to Defendant Secretary’s First Set of Interrogatories.

6. Identify each person whom You expect to call as an expert witness at trial, by providing such expert’s name, address, occupation, place of employment and qualifications to give an opinion, or if such information is available on the expert’s curriculum vitae, such curriculum vitae may be attached to the interrogatory answers as a full response to the foregoing aspects of this interrogatory; and state the general nature of the subject matter on which the expert is expected to testify, and the expert’s hourly deposition fee.

**RESPONSE: Plaintiff has not yet identified any expert witness he intends to call at trial. Plaintiff will supplement his response to this interrogatory if he intends to call an expert witness at trial.**

**Supplemental Response: Plaintiff intends to call Sean Soendker Nicholson as an expert witness at trial. Mr. Nicholson is a principal at GPSImpact where he has had opportunity to gain substantial knowledge and experience on the redistricting process in Missouri. As a principal architect of the 2018 Missouri constitutional amendment about the Missouri redistricting**



process, Mr. Nicholson studied the redistricting process, including consulting with experts across the country in order to gain insight into best practices for redistricting. He has gained experience manipulating census data and using the tools of redistricting, including Dave's Redistricting and Maptitude. During the 2020-2021 redistricting cycle, Mr. Nicholson served as an advisor to members of the citizen commissions.

Mr. Nicholson's hourly deposition fee is \$250 per hour.

Respectfully submitted,

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### **CERTIFICATE OF SERVICE**

I hereby certify that on this 5th day of April, 2023, I electronically filed the foregoing with the Clerk of the Court using the Missouri Courts Electronic Filing System which sent notification to all counsel of record.

/s/ Alixandra S. Cossette

Attorney for Plaintiffs