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

TERRY PETTEWAY, THE HONORABLE DERRECK ROSE, MICHAEL MONTEZ, SONNY JAMES and PENNY POPE,	§ § § §
Plaintiffs,	§ Civil Action No. 3:22-ev-57
v.	\$ \$ \$
GALVESTON COUNTY, TEXAS, and HONORABLE MARK HENRY, in his official capacity as Galveston County Judge,	\$ \$ \$ \$ \$
Defendants.	\$ §
UNITED STATES OF AMERICA,	§ §
Plaintiff,	§
V.	§§Civil Action No. 3:22-cv-93
GALVESTON COUNTY, TEXAS, GALVESTON COUNTY COMMISSIONERS COURT, and HONORABLE MARK HENRY, in his official capacity as Galveston County Judge,	\$ \$ \$ \$ \$ \$
Defendants.	\$ \$ \$
DICKINSON BAY AREA BRANCH NAACP, GALVESTON BRANCH NAACP, MAINLAND BRANCH NAACP, GALVESTON LULAC COUNCIL 151, EDNA COURVILLE, JOE A. COMPIAN, and LEON PHILLIPS,	\$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ \$ Civil Action No. 3:22-cv-117

	§
Plaintiffs,	§
	§
V.	§
	§
GALVESTON COUNTY, TEXAS,	
HONORABLE MARK HENRY, in	§
his official capacity as Galveston	§
County Judge, and DWIGHT D.	§
SULLIVAN, in his official capacity as	§
Galveston County Clerk	
·	§ §
Defendants.	§

<u>UNITED STATES' DESIGNATION OF EXPERT WITNESSES</u>

Pursuant to Federal Rule of Civil Procedure 26(a)(2)(A) and to the Court's July 15, 2022, Amended Docket-Control Order (ECF No. 66), the United States designates the following individuals as expert witnesses:

- 1. **Anthony E. Fairfax**. Mr. Fairfax, the CEO and Principal Consultant of CensusChannel LLC, is a demographic and mapping consultant. He is expected to provide testimony regarding the first *Gingles* precondition and the preparation of an illustrative plan for the Galveston County Commissioners Court.
- 2. **Dr. Max Krochmal**. Dr. Krochmal is a Professor of U.S. History, the Czech Republic Endowed Professor, and Director of Justice Studies at the University of New Orleans. He is expected to provide testimony regarding the history of discrimination and political coalitions in Galveston County and discriminatory intent in the adoption of the 2021 Galveston County Commissioners Court plan.
- 3. **Dr. Rene R. Rocha**. Dr. Rocha is an Associate Professor of Political Science, the Director of Latina/o/x Studies, and the Herman J. and Eileen S. Schmidt Chair at the University of Iowa. He is expected to provide testimony regarding the Senate Factors.
- 4. **Dr. Jessica Trounstine**. Dr. Trounstine is a Professor and the Chair of the Political Science Department at the University of California, Merced. She is also the UC Merced Foundation Board of Trustees Presidential Chair. Dr. Trounstine is

expected to provide testimony regarding the second and third *Gingles* preconditions and racially polarized voting in Galveston County.

The United States will serve copies of reports and related curriculum vitae for Mr. Anthony E. Fairfax and Dr. Rene R. Rocha on all parties on January 13, 2023. The parties have agreed to the United States' request to serve copies of reports and related curriculum vitae for Drs. Max Krochmal and Jessica Trounstine on all parties on January 27, 2023.

Date: January 13, 2023

JENNIFER B. LOWERY United States Attorney Southern District of Texas

DANIEL D. HU
Civil Chief
United States Attorney's Office
Southern District of Texas
Texas Bar No. 10131415
SDTX ID: 7959
1000 Louisiana Ste. 2300
Houston, TX 77002
713-567-9000 (telephone)
713-718-3303 (fax)
daniel.hu@usdoj.gov

KRISTEN CLARKE Assistant Attorney General Civil Rights Division

/s/ Catherine Meza

T. CHRISTIAN HERREN, JR. ROBERT S. BERMAN*
CATHERINE MEZA*
Attorney-In-Charge
BRUCE I. GEAR*
THARUNI A. JAYARAMAN*
ZACHARY J. NEWKIRK*
Attorneys, Voting Section
Civil Rights Division
U.S. Department of Justice
950 Pennsylvania Avenue NW
Washington, DC 20530
202-307-2767 (telephone)
202-307-3961 (fax)
catherine.meza@usdoj.gov

^{*} Admitted Pro Hac Vice

CERTIFICATE OF SERVICE

I hereby certify that on January 13, 2023, I filed the foregoing with the Clerk of the Court using the CM/ECF system, which will send a notification of this filing to all counsel of record in this case.

/s/ Catherine Meza
CATHERINE MEZA