

**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,

v.

GALVESTON, TEXAS, and
HONORABLE MARK HENRY, in
his official capacity as Galveston
County Judge,

Defendants.

Civil Action No. 3:22-cv-57

UNITED STATES OF AMERICA,

Plaintiff,

v.

GALVESTON, TEXAS,
GALVESTON COUNTY
COMMISSIONERS COURT, and
HONORABLE MARK HENRY, in
his official capacity as Galveston
County Judge,

Defendants.

Civil Action No. 3:22-cv-93

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

<i>Plaintiffs,</i>	§
	§
v.	§
	§
GALVESTON, TEXAS,	§
HONORABLE MARK HENRY, in	§
his official capacity as Galveston	§
County Judge, and DWIGHT D.	§
SULLIVAN, in his official capacity as	§
Galveston County Clerk	§
	§
<i>Defendants.</i>	§
	§

PETTEWAY PLAINTIFFS’ DESIGNATION OF EXPERTS

Plaintiffs Terry Petteway, Derreck Rose, Michael Montez, Sonny James, and Penny Pope (“Petteway Plaintiffs”) file this Designation of Expert Witnesses, and would show this Honorable Court as follows:

I. Plaintiffs’ Designation of Retained Expert Witnesses

1. Matt A. Barreto, PhD.
University of California Los Angeles
3345 Bunche Hall,
Los Angeles CA 90095
barretom@ucla.edu
A summary of Dr. Barreto’s qualifications has been provided in the report served to the parties on January 13, 2023. Dr. Barreto is expected to provide testimony regarding the *Gingles* preconditions and racially polarized voting in Galveston County.

2. Michael Rios, MPP

University of California, Los Angeles
3250 Public Affairs Building
Los Angeles, CA 90065
rios.brandon.michael@gmail.com

A summary of Mr. Rios' qualifications has been provided in the report served to the parties on January 13, 2023. Mr. Rios is expected to provide testimony regarding the *Gingles* preconditions and racially polarized voting in Galveston County.

3. Tye Rush

University of California, Los Angeles
4289 Bunche Hall
Los Angeles, CA 90095
Trush001@ucla.edu

A summary of Mr. Rush's qualifications has been provided in the report served to the parties on January 13, 2023. Mr. Rush is expected to provide testimony regarding the first *Gingles* precondition.

4. Traci Burch, Ph.D

Northwestern University
Scott Hall 210
601 University Place
Evanston, IL 60208
Traci.burch@gmail.com

A summary of Dr. Burch's qualifications will be provided to the parties with her report to be served on January 27, 2023 per the agreement of the parties. Dr. Burch is expected to provide testimony regarding the Senate Factors and any discriminatory intent in the adoption of the Galveston County Commissioners Court plan in 2021.

II. Additional Designation

Petteway Plaintiffs hereby reserve their right to designate any rebuttal expert witnesses.

III. Supplementation and Cross Designation

Petteway Plaintiffs hereby cross designate and state that they may call any expert witness identified or designated by any of the other consolidated Plaintiff groups or any adverse party or any employee or representative of any adverse party, subject to any objections that Plaintiffs may make concerning the designation or qualifications of those witnesses.

Petteway Plaintiffs reserve the right to elicit, by way of direct or cross examination, opinion testimony from experts designated and/or called by other parties to the suit. Plaintiffs reserve the right to call any expert witness of any party who may be added to this lawsuit.

Petteway Plaintiffs reserve the right to elicit, by way of cross examination, opinion testimony from corporate representatives or other witnesses designated and/or called by other parties to the suit who may be qualified to render expert testimony.

Petteway Plaintiffs reserve the right to elicit, by way of direct or cross examination, opinion testimony from fact witnesses who may be qualified to render testimony, but are not retained or designated experts at this time and who have expertise in certain areas regarding the facts of this case.

Respectfully submitted this 13th day of January 2023.

/s/ Valencia Richardson

Mark P. Gaber*

Simone Leeper*

Valencia Richardson*

Alexandra Copper*

Campaign Legal Center

1101 14th St. NW, Ste. 400

Washington, DC 20005

(202) 736-2200

mgaber@campaignlegal.org

sleeper@campaignlegal.org

vrichardson@campaignlegal.org

acopper@campaignlegal.org

Sonni Waknin*

Bernadette Reyes*

UCLA Voting Rights Project

3250 Public Affairs Building

Los Angeles, CA 90095

Telephone: 310-400-6019

sonni@uclavrp.org

**admitted pro hac vice*

Counsel for Petteway Plaintiffs

Chad W. Dunn (Tex. Bar No. 24036507)

Brazil & Dunn

4407 Bee Cave Road

Building 1, Ste. 111

Austin, TX 78746

(512) 717-9822

chad@brazilanddunn.com

Neil G. Baron

Law Office of Neil G. Baron

1010 E Main Street, Ste. A

League City, TX 77573

(281) 534-2748

neil@ngbaronlaw.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on January 13, 2023, the foregoing document was filed electronically (via CM/ECF), and that all counsel of record were served by CM/ECF.

/s/ Valencia Richardson
Counsel for Petteway Plaintiffs