

1 STATE OF INDIANA )  
 ) SS:  
2 COUNTY OF MONROE )  
3

4 IN THE CIRCUIT COURT OF MONROE COUNTY

5 CAUSE NO. 53C06-2203-PL-509

6 COUNTY RESIDENTS AGAINST ANNEXATION, INC., )  
 an Indiana not for profit corporation, )  
7 Representative of Those in the Territories )  
 Sought to be Annexed; DON CREEK, HARRY )  
8 FERRIS, WILLIAM MANWARING, DAN DOYLE, )  
 CATHERINE DENSFORD, ETHEL ANN SATLER, )  
9 MARILYN J. DANIELSON, DEAN E. HOKE, BERT )  
 F. PHILLIPS, SUNNY SLATER, HOLLY HILL, )  
10 DEBORAH REED for REED QUARRIES, INC., )  
 THOMAS W. McGHIE, RICKY FERGUSON, THOMAS E.)  
11 OSBORN, JIMMIE JOHNSON, RICHARD PEACH, )  
 KAREN LAUCELLA, BARBARA LEININGER, RHONDA )  
12 GRAY, ARLLYS PAPKE, JOANNA HAHN; and OTHER )  
 TERRITORY 1A AND 1B OWNERS OF LAND, )

13 )  
 )  
14 Petitioners, )

15 )  
 )  
16 -vs- )

17 )  
18 THE COMMON COUNCIL of the City of )  
 Bloomington, Monroe County, Indiana, )  
19 CITY OF BLOOMINGTON, Monroe County, )  
 Indiana, JOHN HAMILTON in his official )  
 capacity as Mayor of Bloomington, Monroe )  
20 County, Indiana, and CATHERINE SMITH in her )  
 official capacity as Auditor of Monroe )  
21 County, Indiana, )  
 )

22 Respondents. )  
23 )

24 DEPOSITION OF MEGHAN BLAIR

25 The deposition upon oral examination of MEGHAN  
BLAIR, a witness produced and sworn before me,  
Colleen Brady, Notary Public in and for the County  
of Monroe, State of Indiana, taken on behalf of the  
Petitioners, at the offices of Bloomington City

Page 2

1 Hall, 401 North Morton Street, Room 225,  
 Bloomington, Monroe County, Indiana, on the  
 2 27th day of March 2024, at 9:01 a.m., pursuant to  
 the Indiana Rules of Trial Procedure with written  
 3 notice as to time and place thereof.  
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<p style="text-align: right;">Page 6</p> <p>1 (Time noted: 9:01 a.m.)  2 MEGHAN BLAIR,  3 having been duly sworn to tell the truth, the whole  4 truth, and nothing but the truth relating to said  5 matter, was examined and testified as follows:  6  7 DIRECT EXAMINATION,  8 QUESTIONS BY RYAN M. HEEB:  9 Q Good morning, Ms. Blair. My name is Ryan Heeb.  10 I'm one of the attorneys that represents the  11 petitioners in the annexation matter. We are  12 here today because you're giving a deposition.  13 Do you understand that you are giving this  14 testimony under oath and it's just as important  15 as if you were in a courtroom for a judge in  16 this matter?  17 A Yes.  18 Q Have you ever given a deposition before?  19 A No.  20 Q I'm going to go over a couple of ground rules  21 that are just going to help us better go about  22 this process and we will, then, go from there.  23 If I ask a question and you answer, is it  24 fair for us to assume you understood the  25 question that is asked?</p>	<p style="text-align: right;">Page 8</p> <p>1 this deposition?  2 A I reviewed the analysis that I did because this  3 trial was supposed to take place in the fall.  4 So I did a lot of this work over the summer, and  5 so to prepare for this deposition was just going  6 over everything I done previously.  7 Q I think we'll get into that a little bit more --  8 or we will get into that a little more later.  9 What documents did you review to prepare  10 for the deposition?  11 A Everything that I submitted to legal. It sounds  12 like -- I don't want to assume that you have  13 that. It was, like, a spreadsheet. It was all  14 my data sources. I was just reviewing,  15 step-by-step, what I did and looked over what I  16 had submitted to legal.  17 Q Okay. You said you submitted a spreadsheet?  18 A Yeah. It was, like, an Excel sheet. A summary  19 table.  20 Q What was that table titled? Do you recall?  21 A I would imagine -- I mean, I don't know for  22 sure. I could imagine it was called summary.  23 Annexation summary.  24 Q And you said you submitted your "data sources."  25 What are those?</p>
<p style="text-align: right;">Page 7</p> <p>1 A I'd say it's fair to assume that. It's my first  2 time here so I might need you to repeat yourself  3 or something like that.  4 Q That's fine. And if you don't understand my  5 question, please, ask me to rephrase it. Okay?  6 A Uh-huh.  7 Q The court reporter is transcribing everything  8 that you and I are saying to each other; so it's  9 very important that we not speak over each  10 other. Let me ask my question, then, you  11 provide your answer. You provide your answer,  12 and I will ask my next question. Okay?  13 A Okay.  14 Q It's also important that you provide clear yes's  15 and no's or clear responses, rather than shakes  16 of the head or nods of your head. Okay?  17 A That's going to be hard for me. I definitely  18 talk with my hands; so ...  19 Q That's okay. I will do my best to clarify as  20 well. You can take breaks at any point in time  21 during this deposition. If there's a question  22 pending, all that I ask is that you answer the  23 question before we take that break. Okay?  24 A Okay.  25 Q So, Ms. Blair, what have you done to prepare for</p>	<p style="text-align: right;">Page 9</p> <p>1 A Yeah. So where I actually got the census data  2 that I used, the raw data. You know, the county  3 zoning layer. The county parcel layer. So I  4 reviewed my data sources and reviewed what I did  5 and what I submitted.  6 Q So aside from the spreadsheet and data sources,  7 what else did you submit?  8 A Maps. So a collection of maps that were  9 produced in 2021. And then we recreated the  10 maps in 2023 to be up to date. And then as well  11 submitted was a documented -- like, a Word  12 document -- that listed the data sources and  13 listed some of the classification information  14 that I used.  15 Q Anything else?  16 A I'd have to -- I mean, I don't remember  17 everything that was in the submittal off the top  18 of my head, but that was the gist of it.  19 I did some analysis for an expert witness  20 for legal. And so I reviewed that as well.  21 Q What was the name of that expert witness?  22 A I don't -- Russ. I don't know the full name,  23 sorry. that was back in August. I haven't had  24 any communication with him.  25 Q Who have you met with to prepare for your</p>

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1 deposition? And I don't want to know about any  
 2 communications that you've had with any of  
 3 City's legal counsel.  
 4 A Yeah. Just legal and my -- and Max Stier, who  
 5 is in my GIS team.  
 6 Q Tell me about the meeting you had with Max Stier  
 7 in preparation for the deposition.  
 8 A Yeah, preparation was him was, like, this is  
 9 when the deposition is; these are when the  
 10 meetings are going to be --  
 11 MR. UNGER: Object to the extent it  
 12 involves discussions with legal counsel. I  
 13 don't think he's asking you for any kind of  
 14 discussions with legal counsel. He's asking you  
 15 for your discussions with Max.  
 16 And no objection to the extent it's  
 17 discussions with just Max.  
 18 Q Go ahead and answer.  
 19 A I will say, most of my time talking with Max was  
 20 with legal present.  
 21 Q Was there, the times that you spent --  
 22 A Not talking to him was exactly what I was  
 23 saying, which is: the deposition is at 9. I  
 24 need the maps produced by a certain date.  
 25 Here's where my data is. You know, this is

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1 where it's saved, right. This is where to  
 2 upload it and to put it into that submittal.  
 3 You know, so more of just staying on task  
 4 and assigning tasks. I'm Max's manager. So  
 5 just normal communication of work.  
 6 Q Did you ask -- excuse me -- ask Max to recreated  
 7 maps ahead of today's deposition?  
 8 A Ahead of today's deposition?  
 9 Q Yes.  
 10 A There was one map that I'm not sure -- that when  
 11 I was reviewing -- like I said, that's how I  
 12 prepped for this deposition -- that I noticed  
 13 the legend was missing. Some part of the  
 14 legend. Nothing about the map itself changed,  
 15 but the legend was, somehow, not populated, and  
 16 I asked him to recreate that map. That's it.  
 17 Q What did this particular map depict?  
 18 A County zoning. So it's just -- there was no  
 19 analysis whatsoever. It was literally: here's  
 20 the zoning layer for the county. Put it on the  
 21 map with colors.  
 22 Q I want to go back a second. You said there were  
 23 maps that were produced in 2021, which were  
 24 recreated in 2023. How did the maps that --  
 25 well, what were these maps that were created in

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1 2021 that you're referencing?  
 2 A Well, that's was before I was in my current  
 3 role. So it's hard for me to -- I can't speak  
 4 on their creation at all. So I -- I'm not even  
 5 going to speculate, but I would imagine that it  
 6 was probably because of the trial that was going  
 7 to go on in 2021. You know, I don't know.  
 8 You know, the zoning layer might have  
 9 changed from 2021 to 2023. The parcels of the  
 10 county would have changed from 2021 to 2023.  
 11 Q What other changes from 2021 to 2023?  
 12 A That would be it.  
 13 Q And I'm sorry, again, the -- which of these maps  
 14 are you referring to?  
 15 I'm trying to determine which maps were  
 16 produced in 2021 that were --  
 17 A I don't have that list. I don't know them right  
 18 off the top of my head.  
 19 Q Have you done anything else to prepare for  
 20 today's deposition?  
 21 A No.  
 22 Q Ms. Blair, I'm handing you what is titled a  
 23 subpoena duces tecum.  
 24 Have you ever seen this document?  
 25 MR. UNGER: Do you want to mark it?

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1 MR. HEEB: Yeah, why don't we.  
 2 (Off the record.)  
 3 (Deposition Exhibit 75 marked for  
 4 identification.)  
 5 BY MR. HEEB  
 6 Q Ms. Blair, I'm handing you what's been marked as  
 7 Exhibit 75, which is a subpoena duces tecum,  
 8 that was submitted to you in this matter.  
 9 Have you ever seen this document before?  
 10 A No.  
 11 Q Please turn to page 2 of Exhibit 75. Ms. Blair,  
 12 did you bring with you today true and accurate  
 13 copies of each and every exhibit for which you  
 14 will give testimony at trial sponsoring,  
 15 authenticating, or referencing any such exhibit?  
 16 MR. UNGER: I want to object to the extent  
 17 it asks for basically attorney mental  
 18 impressions. The witness doesn't decide what  
 19 she's going to testify at trial to. And we've  
 20 outline an objection, just so you know, in  
 21 writing in an email to you to the subpoena.  
 22 But object to the extent, again, it asks  
 23 for attorney mental impressions about what the  
 24 trial -- what she's going to be asked at trial.  
 25 MR. HEEB: Well, I can ask her about what

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1 exhibits she is going to provide sponsoring  
 2 testimony for. And I don't -- you say an email,  
 3 I haven't seen that this morning.  
 4 MR. UNGER: Do you want to go off the  
 5 record? You can take a look.  
 6 MR. HEEB: Well, I don't -- I don't -- I'm  
 7 just saying.  
 8 (Off the record.)  
 9 BY MR. HEEB  
 10 Q Ms. Blair, there's some discussion off the  
 11 record here. It's my understanding that you  
 12 have not seen the subpoena duces tecum that has  
 13 been marked as Exhibit 75.  
 14 It's also my understanding that every  
 15 exhibit for which you will give testimony at  
 16 trial, sponsoring, authenticating, or  
 17 referencing is contained on a flash drive that's  
 18 been provided ahead of this deposition?  
 19 MR. UNGER: I object, again, to the  
 20 question because what you're asking the witness  
 21 to testify to is what exhibits she is going to  
 22 testify to at trial. That is not a question for  
 23 the witness. She doesn't -- you're asking for a  
 24 legal -- an attorney question of what is the  
 25 attorney going to introduce at trial, right; so

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1 I object --  
 2 MR. HEEB: But that's not --  
 3 MR. UNGER: Again, I'll allow the witness  
 4 to answer to the extent that she can answer.  
 5 But, again, I object to the question.  
 6 MR. HEEB: Sure. And just so we're clear,  
 7 this is a discovery deposition. So we can -- I  
 8 think that's perfectly appropriate to ask her.  
 9 So can you, please, restate the question?  
 10 (The requested text was read by the  
 11 reporter.)  
 12 MR. UNGER: Same objection. But the  
 13 witness can answer to the extent that she can.  
 14 BY MR. HEEB  
 15 Q Ms. Blair, do you know which exhibits you're  
 16 going to sponsor, authenticate or reference at  
 17 trial?  
 18 A I don't.  
 19 Q And then on Number 2, have you brought with you  
 20 today true and accurate copies of each and every  
 21 document, dataset, or other such item upon which  
 22 you base any testimony you will give at the  
 23 trial on this matter?  
 24 MR. UNGER: Same objection to the extent --  
 25 but to the extent you can answer.

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1 Q You can answer.  
 2 A I didn't bring anything with me today.  
 3 Q So you didn't bring anything responsive to the  
 4 subpoena duces tecum?  
 5 A I guess I'm confused by that question, but I  
 6 don't have anything with me right now, today at  
 7 this moment.  
 8 Q Ms. Blair, did you help produce the documents  
 9 that are apparently on this flash drive in any  
 10 way?  
 11 MR. UNGER: I want to object to the extent  
 12 it gets into communications with legal counsel.  
 13 But, otherwise, to the extent you can answer  
 14 without getting into legal counsel  
 15 communications, you can answer.  
 16 A Sorry. I'm just confused. Can you repeat the  
 17 question?  
 18 MR. HEEB: Can you repeat the question?  
 19 (The requested text was read by the  
 20 reporter.)  
 21 A You know, I did not look at the flash drive so I  
 22 can't speak to what's on it. I do know that I  
 23 gave my analysis and work to legal. And I trust  
 24 the legal team; so ...  
 25 Q Do you know if any documents were withheld for

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1 any reason?  
 2 A Not that I'm aware of.  
 3 Q I want to turn to your background. What is your  
 4 title please?  
 5 A GIS manager.  
 6 Q What is your job description?  
 7 A I manage the entire GIS system for the City of  
 8 Bloomington. So that includes supervising  
 9 employees, managing projects, working with  
 10 department heads and the mayor, and working with  
 11 the public.  
 12 Q Can you explain to me what the GIS system is?  
 13 A Yeah. It's a geographic information system. So  
 14 the simplest way to explain it is it's the  
 15 database. Think about multiple Excel sheets all  
 16 interconnected together, but the data has an XY  
 17 coordinate; it has a place on the earth. That's  
 18 the only difference between a GIS database and a  
 19 database for human resources or a financial  
 20 database. It has an XY coordinate so you can  
 21 display it on a map.  
 22 Q Is it fair to call it the GIS department of the  
 23 City of Bloomington?  
 24 A It's within the ITS department, but we call it  
 25 the GIS division.

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1 Q Okay. So is it fair to say the GIS division  
 2 does not compile these, quote, unquote,  
 3 "spreadsheets" that you referenced? It doesn't  
 4 do data collection?  
 5 A We do -- we -- the GIS department sort of houses  
 6 information for all the departments. So, for  
 7 instance, we have a dataset of all the streets  
 8 within the City of Bloomington. Those streets  
 9 are part of the Public Works department, but  
 10 they are housed in our database. So, yeah, it's  
 11 kind of, like, there's a connection between  
 12 every department and our division.  
 13 Q The GIS division employees do not go out a count  
 14 the number of streets in the City of Bloomington  
 15 or the number of miles of streets in the City of  
 16 Bloomington, do they?  
 17 A We have -- we do a small amount of field data  
 18 collection. We will go out and collect data for  
 19 an engineering project that's complete.  
 20 Q Did the GIS division do any field data  
 21 collection in relation to the City of  
 22 Bloomington's annexation efforts?  
 23 A As far as -- no, we compiled data sources. And  
 24 evaluated the data.  
 25 Q Prior to being the GIS division manager, what

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1 other positions or employment have you held?  
 2 A I was assistant GIS coordinator with the  
 3 utilities department here at the City of  
 4 Bloomington.  
 5 Q And prior to that, what did you do?  
 6 A I was a GIS -- it was with the GIS utilities  
 7 department at IU.  
 8 Q And how about prior to that?  
 9 A I ran my own business.  
 10 Q What business did you --  
 11 A It was a landscaping and property management  
 12 business.  
 13 Q Where was that?  
 14 A Wyoming.  
 15 Q What was the name of it?  
 16 A Salt River Landscaping and Design.  
 17 Q What brought you to Bloomington?  
 18 A Life circumstances. Needed the change.  
 19 Q Could you describe your educational background  
 20 for me?  
 21 A I have a Bachelor of Science in biology with a  
 22 concentration in environmental studies from the  
 23 University of Scranton. Then I have a graduate  
 24 certificate in GIS from Penn State University.  
 25 And I completed half of my master's degree in

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1 natural resources, but I ended up starting my  
 2 own business instead and did not complete.  
 3 Q Have you ever taken any courses in demography?  
 4 A No, I have not.  
 5 Q Have you ever received any special training in  
 6 demography?  
 7 A As part of my GIS graduate degree, we definitely  
 8 did analysis with demography data.  
 9 Q You said graduate degree. So you have a  
 10 graduate degree from Penn State?  
 11 A Yes. It's a graduate level certificate.  
 12 Q Is there a difference between graduate degree  
 13 and a graduate level certificate?  
 14 A Not really, no.  
 15 Q I believe you've already said this, but who is  
 16 Max Stier?  
 17 A He is a GIS specialist here with the City of  
 18 Bloomington.  
 19 Q What projects has Mr. Stier worked on for  
 20 annexation?  
 21 A He was the person who created -- depicted the  
 22 data in map form. So he made the data visual.  
 23 Q Did he perform a population analysis for Area 1A  
 24 or 1B?  
 25 A No, he did not.

Page 21

1 Q Did he perform a subdivision analysis for Area  
 2 1A or 1B?  
 3 A No.  
 4 Q Who is Laura Haley?  
 5 A Laura Haley was the GIS manager before I was  
 6 hired.  
 7 Q Are you still in contact with her?  
 8 A No.  
 9 Q When was the last time you spoke with Ms. Haley?  
 10 A She came to, like, an ITS party here at the  
 11 city. I can't -- I don't think it was a holiday  
 12 one. I'm not sure why we were together. I said  
 13 hi to her. That was about it. That would have  
 14 been in the fall probably. It was probably a  
 15 holiday party. I guess December of 2022.  
 16 Q Is Ms. Haley still employed by the City of  
 17 Bloomington?  
 18 A Not that I'm aware of.  
 19 Q Since Ms. Haley left her position at the GIS  
 20 division, have you had any conversations with  
 21 her about annexation or projects the GIS  
 22 division is performing for the annexation  
 23 effort?  
 24 A No.  
 25 Q Did Ms. Haley perform a population density

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1 analysis for Area 1A or 1B?  
2 A She did when she had the GIS manager position.  
3 Q I'm sorry, when did she leave that position?  
4 A I started October 2022. I think she left before  
5 that though. She left August 2022.  
6 Q So she would have performed the population  
7 density analysis prior to August 2022?  
8 A Correct.  
9 Q What about a subdivision analysis for Area 1A or  
10 1B?  
11 A I can't speak to that. I don't ever remember  
12 seeing it.  
13 Q Do you happen to have any contact information  
14 for Ms. Haley?  
15 A I'm sure someone in my department does, but I,  
16 personally, do not.  
17 Q Could you provide -- and it's fine after the  
18 deposition. Could you provide contact  
19 information, address, phone number for us?  
20 A After speaking to legal and seeing if that's  
21 appropriate.  
22 Q Sure.  
23 A Yes.  
24 Q Sure, you can. Okay. Does the GIS division  
25 have any ongoing projects for the annexation

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1 efforts?  
2 A No.  
3 Q Jumping a little out of order here, but are you  
4 familiar with the city's attempted annexation of  
5 certain areas around Bloomington?  
6 A I know about them. I would not say I'm familiar  
7 with them, no.  
8 Q Do you live in any area which the city is  
9 attempting to annex?  
10 A No.  
11 Q Are you in favor of or opposed to annexation?  
12 A I don't have an opinion on the topic.  
13 Q We're going to be talking about proposed Areas  
14 for Annexation 1A and 1B today. Do you know  
15 where either of these areas are located?  
16 A 1A is west of town. Kind of encompasses Walmart  
17 and a large shopping area. Then 1B is primarily  
18 south of town. It encompasses a very large  
19 residential neighborhood and, yeah, golf course  
20 and some other properties.  
21 Q Are you familiar with the Indiana annexation  
22 statutes?  
23 A No.  
24 Q So you haven't read any of them?  
25 A No.

Page 24

1 Q I want to turn now to the resident population  
2 density analysis. Ms. Blair, have you performed  
3 an analysis of the population density of Area  
4 1A?  
5 A Yes.  
6 Q Who else within the City of Bloomington GIS  
7 division has performed an analysis of the  
8 population density for 1A?  
9 A Laura Haley.  
10 Q So just you and Laura Haley are the only two who  
11 have analyzed the population density?  
12 A Uh-huh.  
13 Q How many times have you performed the population  
14 density analysis for Area 1A?  
15 A I mean, when I was going through my process, a  
16 handful of times. You know, I wanted to check  
17 my work multiple times. Every time I review it,  
18 even for this deposition, I did the analysis  
19 again just to make sure.  
20 Q Does the analysis or the numbers ever change?  
21 A No.  
22 Q Based on your analysis, is the resident  
23 population density of Area 1A at least three  
24 persons per acre?  
25 A I don't have that spreadsheet. Like, I don't

Page 25

1 have the numbers memorized.  
2 Q What is the resident population density of Area  
3 1A?  
4 A I don't know off the top of my head.  
5 Q What was your resident population density  
6 analysis based upon?  
7 A Based upon? It was based upon the 2020 Census.  
8 Q Anything else?  
9 A And then the annexation boundary itself.  
10 Q Anything else?  
11 A No. Just the census, census blocks from 2020  
12 and annexation boundary.  
13 Q Are you familiar with census tracts?  
14 A Uh-huh.  
15 Q Can you explain the difference between census  
16 blocks and census tracts to me?  
17 A A tract is made up of blocks.  
18 Q So tract, larger; blocks, smaller?  
19 A Tract would be larger. Always larger. A block  
20 is smaller, correct.  
21 Q I am going to go through a similar set of  
22 questions for Area 1B.  
23 Have you performed an analysis of  
24 population density of Area 1B?  
25 A Yes.

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1 Q Who else within the City of Bloomington GIS  
 2 division has performed analysis of population  
 3 density for Area 1B?  
 4 A Just Laura Haley and I.  
 5 Q And how many times have you performed this  
 6 analysis for Area 1B?  
 7 A Multiple times as I was, you know, checking over  
 8 my work.  
 9 Q Based on your analysis, is the resident  
 10 population density of Area 1B at least three  
 11 persons per acre?  
 12 A Again, I don't have the numbers memorized.  
 13 Q What is the population density of Area 1B?  
 14 A I don't know off the top of my head.  
 15 Q And what was your analysis of the resident  
 16 population density of Area 1B based upon?  
 17 A The 2020 Census blocks and the annexation  
 18 boundary.  
 19 Q Nothing else?  
 20 A Nothing else.  
 21 Q Can you tell me the first time you performed  
 22 population density analysis of Area 1A and 1B?  
 23 A I don't know the exact date. It would have  
 24 been, I'm assuming, summer of 2023.  
 25 Q Who requested you perform this analysis?

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1 MR. UNGER: Objection to the extent it asks  
 2 for discussions with legal counsel.  
 3 If you can answer other than legal counsel,  
 4 you can go ahead and answer.  
 5 A I can't speak to that.  
 6 Q You can't speak to that because?  
 7 A It infringes on legal or whatever. I don't know  
 8 how to word that.  
 9 Q Yeah. And I don't want to know about  
 10 conversations that you had with legal counsel.  
 11 Did you produce any documents that  
 12 contained your population density analysis?  
 13 A Any documents? The summary sheet, summary  
 14 spreadsheet. I mean, there's data, I mean, that  
 15 the -- so there's the summary spreadsheet, and  
 16 then there's like the data in an Excel, like,  
 17 where it's, like, all of the fields from all of  
 18 the census data and everything like that.  
 19 So there's kind of two sets of data that's  
 20 produced -- or two, sort of, documents. An  
 21 Excel sheet that contains all of the data, and  
 22 then a summary table.  
 23 Q This spreadsheet that contains all of the data,  
 24 what data is in that spreadsheet?  
 25 A Yeah. That's a list of all of the blocks in the

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1 annexation area. And then the blocks associated  
 2 to the annexation area that they're in, right.  
 3 So if Block 1005, which annex -- you know, is it  
 4 in an annexation area or not.  
 5 Q Any other data that this spreadsheet contains?  
 6 A Just annexation data and census block data.  
 7 Plus, I guess, there are a couple of columns  
 8 where there's the analysis took place. So the  
 9 percentage of the annexation area in the block  
 10 itself.  
 11 Q Percentage of annexation area in the block  
 12 itself, can you explain that to me?  
 13 A Sure. So a block -- it's easy to picture it as  
 14 a square. They're not squares though, but a lot  
 15 of them are. And if an annexation -- if the  
 16 annexation area covers a block completely, then  
 17 you would have 100 percent of the block is  
 18 inside of the annexation area. And at that  
 19 stage, then, all 100 people would be in the  
 20 annexation area or 100 percent of the people in  
 21 the block would be in the annexation area.  
 22 Q And what about for blocks that were not  
 23 100 percent in the annexation area?  
 24 A Right. So blocks that were -- where the  
 25 annexation area was not completely covering the

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1 block, there was a percentage based on the area  
 2 that was within the block.  
 3 So if the block had 100 people, for  
 4 instance, and the annexation area covered  
 5 25 percent of the block -- so 25 percent of the  
 6 block is within the annexation area -- you would  
 7 take 25 percent of the people in the block. So  
 8 100 times .25. You would get 25 people would be  
 9 in the annexation area.  
 10 Q Is that calculation based on the assumption that  
 11 the population of that block -- that you're  
 12 using as an example -- is evenly distributed  
 13 throughout the block?  
 14 A That -- I never made that as an assumption, no.  
 15 To answer that question, no.  
 16 Q How did you know that, again, for this  
 17 hypothetical block, 25 percent of which is  
 18 within the annexation area? How did you know  
 19 that 25 people actually lived in that block?  
 20 A What I do know is --  
 21 Q Or portion of the block?  
 22 A -- the 2020 Census is the most -- is the only  
 23 way that the population is measured in the  
 24 United States. And I wanted to create a method  
 25 that was repeatable and unbiased, and by using a



<p style="text-align: right;">Page 30</p> <p>1 percentage, it eliminated any bias I might have  2 while calculating the population density.  3 Q Okay. I appreciate that, but I don't think that  4 answered my question of how you knew that there  5 were -- again, 25 based on your calculation --  6 25 people actually lived in that portion of the  7 block?  8 A I don't believe there's any way to know any  9 closer than the census data of how you can know  10 whether 25 people lived in that one area or not.  11 Q Why do you say that?  12 A Because the census is required by law. And so  13 it's required that citizens complete it. And  14 it's really the only tool we have to calculate  15 population.  16 If I were to start looking at density of  17 houses and rooftops, I would be, again, bringing  18 in my bias of what that rooftop looked like or  19 what was going on inside of that building, and I  20 did not want to bring any bias into my  21 calculation whatsoever.  22 Q So to perform this population density analysis  23 you needed to determine how many people lived in  24 Area 1A; correct? And or 1B?  25 A Correct. Trying to find the number of people</p>	<p style="text-align: right;">Page 32</p> <p>1 possible or feasible. And I don't see how that  2 would be any more accurate than the census which  3 is required by law.  4 Q Did you use federal decennial census data for  5 your calculations?  6 A Yeah. So the 2020 was the federal.  7 Q Did you ever use any other federal censuses  8 to -- censi? -- to perform --  9 A No, I did not.  10 Q Did you use federal special census data for your  11 calculations?  12 A I'm not sure what that is.  13 Q I'm going take that as a no, if you don't know  14 what it is.  15 A If you could provide an example of what "special  16 census data" is. I'm just not sure.  17 Q Well, I will leave that to you. Did you use a  18 special tabulation for your calculations?  19 A Nothing I did was special.  20 Q Have you used a corrected population count for  21 your population density calculations?  22 A Like a 2020 corrected population?  23 Q Sure.  24 A I mean, I got my census data for census.gov.  25 Q Was there any other evidence or data that you</p>
<p style="text-align: right;">Page 31</p> <p>1 that lived in that area, yeah, that was the  2 goal.  3 Q And then to determine density, how did you  4 perform that calculation?  5 A That is you just take the population and you  6 divide it by, you know, the number of acres in  7 the annexation area.  8 Q So if I've got 100 people that live within 10  9 acres, take the number of people, divide it by  10 the number of acres?  11 A Yeah. Persons per acre.  12 Q What tools did you use to perform this analysis?  13 A ArcGIS Esri, GIS pro.  14 Q Anything else?  15 A That was -- I did all of my analysis within that  16 software.  17 Q In your conclusions of the population density  18 are based on your interpretation of the census  19 data and calculations; correct?  20 A Correct.  21 Q They're not based on you actually going out and  22 counting the number of people that lived in Area  23 1A or 1B?  24 A I don't believe that -- no, I did not go out and  25 count anyone. I don't believe that that's even</p>	<p style="text-align: right;">Page 33</p> <p>1 used to make your population density  2 calculations?  3 A No.  4 Q Do you know the total number of acres that are  5 in Area 1A?  6 A Not off the top of my head.  7 Q Same question for 1B.  8 A Not off the top of my head.  9 Q Are you aware of the city ever publicly  10 representing the total number of people that  11 live in Area 1A or 1B?  12 A I have no idea.  13 Q Has anyone asked you to change or modify your  14 calculations of the total number of people that  15 live in Area 1A or 1B?  16 A No.  17 Q Are you aware of whether the City of Bloomington  18 performed a house-to-house count of the number  19 of people that live in Area 1A or 1B?  20 A I'm not aware of anything like that.  21 Q I think we talked about Ms. Haley's analysis of  22 the population density for Area 1A and 1B. Do  23 you know when she performed this analysis?  24 A I don't know.  25 Q Do you know how?</p>

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1 A She did leave a set of directions, but I can't  
2 say whether -- I mean, I never spoke to her  
3 about it. So leaving a set of directions and  
4 knowing how she did it are two different things.  
5 Q What did that set of directions tell you?  
6 A It told me the data that she used and, like,  
7 where to find the annexation data, and that she  
8 did it off of the -- like, her method, which was  
9 the same method I followed, which was based off  
10 the percentage of annexation area in the block.  
11 Q Why did you have to use the percentage of a  
12 block in the annexation area? Why was that part  
13 of the method?  
14 A Well, the 2020 -- like I mentioned before, the  
15 census is the only data source in the United  
16 States where it's measuring the population. It  
17 would be unreasonable to take the full 100  
18 percent of the population if that entire block  
19 wasn't in the annexation area.  
20 Q I guess what I'm trying to get at is the census  
21 blocks do not perfectly coordinate with the  
22 proposed annexation areas; correct?  
23 A Correct.  
24 Q Do you know if Ms. Haley used any other data  
25 other than the 2020 Census?

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1 A The 2020 Census was not released when she did --  
2 'cause there's, like, a lag. So, again, I don't  
3 know when she did her analysis, but hers was  
4 based off the 2019 ACS data, which is American  
5 Community Survey. It's also released -- it's  
6 part of the census. It's an estimate of the  
7 population.  
8 Q Is the 2020 Census also an estimate of the  
9 population?  
10 A No, it's not an estimate.  
11 Q Why do you say that?  
12 A Because it's required by law for everyone to  
13 fill it out. It's an actual count. The  
14 estimate of the ACS is a projection. It's not  
15 based on any surveys completed by people.  
16 Q Do you know how many people Ms. Haley estimated  
17 lived in Area 1A or 1B?  
18 A No, I don't.  
19 (Deposition Exhibit 76 marked for  
20 identification.)  
21 Q Ms. Blair, I'm handing you what has been marked  
22 as Exhibit 76. Would you please take a minute  
23 to look at this document?  
24 A Yep.  
25 Q Do you recognize Exhibit 76?

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1 A Looks like a GIS report that I produced.  
2 Q Will you please turn to the second page of  
3 Exhibit 76?  
4 A Yeah.  
5 Q Under "New Projects," do you see where it says,  
6 "Ran initial population estimates"?  
7 A No. Sorry, what section are we in?  
8 Q If you go under "New Projects."  
9 A Oh, I see.  
10 Q You see that, where it says, "Ran initial  
11 population estimates"?  
12 A Yeah.  
13 Q "And got the same numbers as Laura."  
14 Can you explain what that means?  
15 A Yeah, absolutely. So I wanted to run Laura's  
16 analysis as she did it on her data. So I ran  
17 her analysis on the 2019 ACS, and my numbers  
18 matched hers; and so what that told me is that I  
19 fully understood her methods that she used.  
20 Q I want to back up a second. When was the 2020  
21 Census data available?  
22 A I don't know.  
23 Q Presumably after 2020?  
24 A Yeah. I would -- it's definitely, I mean, it's  
25 clearly after 2020. It might not even be till

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1 2022.  
2 Yeah, there's usually, like, a year lag  
3 when they release, at least, as far as my  
4 knowledge. But you'd have to research that  
5 yourself.  
6 Q Sure. Will you turn to page 3 of Exhibit 76.  
7 Under the "OOTM Staff Viewer."  
8 A Yes.  
9 Q Second bullet point, it says, "Urbanization and  
10 Annexation Area maps request from Kaisa," and  
11 then parentheses Max.  
12 What are those?  
13 A Okay. Yeah, so I think it's pronounced Kaisa.  
14 Q Kaisa.  
15 A She worked for the office of the mayor, and she  
16 wanted a map that just depicted the annexation  
17 boundaries and the urbanization boundary. And  
18 Max created that map.  
19 Q What is the urbanization boundary?  
20 A You know, just by just saying that one word,  
21 urbanization, it can be a number of things. As  
22 far as my memory of that, the county, Monroe  
23 County, has a field in their parcel data called  
24 urbanization. Like, is it urbanizing or not.  
25 It's just a field in their data.

<p style="text-align: right;">Page 38</p> <p>1 Q Do you know what that field takes into 2 consideration? 3 A I don't. 4 Q So you don't -- 5 A And that's just what I'm assuming that was. I 6 mean, there's other urbanization boundaries; 7 like the FTA, Federal Transit Authority, also 8 has an urbanization boundary. 9 But this wasn't something we create -- we 10 did not do a urbanization study to make that. 11 That was just re -- you know, producing somebody 12 else's data on a map. 13 Q Has the City of Bloomington performed an 14 urbanization study of Area 1A or 1B? 15 A Not that I'm -- I don't know everything that the 16 city has done. So I really don't feel 17 comfortable answering that question. 18 Q Well, how about this, has the GIS division 19 performed an urbanization study of Area 1A or 20 1B? 21 A I have not performed any other analysis except 22 for what's been given to you for this 23 annexation. As far as when I've been here, 24 we've not done an urbanization, sort of, study, 25 no.</p>	<p style="text-align: right;">Page 40</p> <p>1 Q Do you know how this analysis was performed? 2 A Because I don't know who did this, I mean, I -- 3 to me it looks like Laura's work. But, you 4 know, I don't know. I've never seen it before. 5 Q I want to specifically look at in that first 6 paragraph, in the second sentence, where it 7 says, "When examining an annexation Area." 8 Do you see that? 9 A Yeah. 10 Q It says "Certain areas were eliminated," are you 11 aware of why that was done? 12 A I don't know. 13 Q And then turning to the table that appears on 14 the first page of Exhibit 77, do you see the 15 column that says "Population Estimate"? 16 A I do. 17 Q Do you know how the population estimate for Area 18 1A was calculated in this document. 19 A I do not. 20 Q Okay. Same question for Area 1B. 21 A I do not. 22 Q Do you know how the residential acres all was 23 calculated? 24 A I do not. 25 Q And then turning to the second page, the first</p>
<p style="text-align: right;">Page 39</p> <p>1 Q Are you aware of whether Ms. Haley did an 2 urbanization study of the proposed annexed 3 areas? 4 A You know, she had this job for 30 years so hard 5 for me to say what she did in 30 years time 6 period. 7 Q So the answer is you don't know? 8 A I don't know. 9 (Deposition Exhibit 77 marked for 10 identification.) 11 Q Ms. Blair, I'm handing you what has been marked 12 as Exhibit 77. Will you please take a look at 13 this document? 14 Do you recognize Exhibit 77? 15 A I've never seen this before. 16 Q So you didn't prepare this document? 17 A I never prepared this document, no. 18 Q Do you know who did? 19 A I don't know who did. 20 Q Do you know when it was prepared? 21 A No. 22 Q Do you know what the purpose is of this 23 document? 24 A I don't know why it was created. I mean, I'm 25 imagining it's for annexation trial.</p>	<p style="text-align: right;">Page 41</p> <p>1 table that appears on the second page of 2 Exhibit 77, do you know how the nonvacant 3 residential acres were calculated? 4 A I do not. 5 Q In the second table on page 2, Exhibit 77, do 6 you know how residential acres was calculated? 7 A I do not. 8 (Deposition Exhibit 78 marked for 9 identification.) 10 Q Ms. Blair, I'm handing you what's been marked as 11 Exhibit 78. Will you please take a look at that 12 document. 13 What is Exhibit 78? 14 A This is the summary sheet that I created. 15 Q When did you create this document? 16 A August 2023. 17 Q Have you updated this summary sheet since then? 18 A No. 19 Q Do you anticipate updating this summary sheet 20 ahead of the trial? 21 A Not that I have any plans to do. 22 Q What was the purpose of this summary sheet? 23 A The purpose of this summary sheet was to 24 summarize the total acres, total population, 25 zoning acres, parcel acres, persons per acre,</p>

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1 percent parcels that were 1 acre or less, census  
 2 urban area designation acreage, and the  
 3 unwaivered remonstrators data.  
 4 Q Why is it called an urbanization summary?  
 5 A I didn't really put any thought to that,  
 6 honestly.  
 7 Q So the total population that appears under the  
 8 column for 1A is 4,351, according to Exhibit 78.  
 9 Is that correct?  
 10 A That seems to be correct, yeah.  
 11 Q Can you tell me how you arrived at that number?  
 12 A Yeah. I went to census.gov and downloaded the  
 13 2020 Census blocks, brought that into my GIS  
 14 software; overlaid the Annexation Area 1A over  
 15 top of the blocks, calculated acreages within  
 16 both of those, calculated the percentage of the  
 17 acreage within the annexation area that's in the  
 18 block, multiplied the population of the block by  
 19 the percentage of the annexation area, and then  
 20 added all of those populations together in 1A to  
 21 come up with that number.  
 22 Q Did you perform the same type of analysis to  
 23 come up with the population that appears under  
 24 1B column?  
 25 A Yes, it was the same method.

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1 Q So if I wanted to, based on your method,  
 2 calculate the population density of Area 1A, I  
 3 would take your total population count: 4,351,  
 4 and divide it by 3,158; correct?  
 5 A Sorry, can you repeat that one more time? I  
 6 spaced out when you first were talking, sorry.  
 7 Q That's okay. That's all right.  
 8 So if I wanted to calculate the population  
 9 density of Area 1A, I would take the total  
 10 population -- as you put in that column -- and  
 11 divide it by the total acres?  
 12 A Correct.  
 13 Q And the same would go for 1B?  
 14 A Correct.  
 15 Q Do you know, then, what those calculations  
 16 resulted in persons per acre?  
 17 A Well, in the persons per acre on the side there,  
 18 if you look at "Total Annexation," those are the  
 19 numbers.  
 20 So for 1A, it came out to be 1.38, and 1B  
 21 was 3.28 persons per acre.  
 22 Q Based on your calculations, the resident  
 23 population density of Area 1A is 1.38?  
 24 A If you look at the entire total acres and entire  
 25 total population, yes.

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1 Q And then the same question for Area 1B. That  
 2 would be 3.28?  
 3 A Yeah. If you look at all of the acres combined  
 4 and all of the people, yes.  
 5 Q I want to go to the zoning designation section.  
 6 What are CIB acres?  
 7 A That is just an acronym for commercial,  
 8 industrial, and business.  
 9 Q So how did you calculate commercial -- so is  
 10 that calculation the commercial, industrial,  
 11 business acres in Area 1A?  
 12 A Yeah.  
 13 Q And 1B?  
 14 A Uh-huh.  
 15 Q How did you calculate that?  
 16 A I acquired the county zoning GIS layer. The  
 17 county zones -- the county has a layer --  
 18 basically every area within the county falls  
 19 within a zone. Once I found I had a layer, I  
 20 used and overlaid the annexation over top of it  
 21 and, basically, clipped it -- like a cookie  
 22 cutter, right -- because some zones are massive  
 23 and I only needed the zones that were in the  
 24 annexation boundary.  
 25 And then I just ran the analysis within the

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1 software that said we'll calculate the acres  
 2 within those zones. And then to classify the  
 3 zones -- this is kind of what you're getting at  
 4 here -- as part of my submittal to legal,  
 5 there's a list of -- doesn't look like it's in  
 6 that one. So that's why I'm not sure who  
 7 produced that.  
 8 There's a breakdown of which zones are  
 9 considered CIB and which are considered  
 10 residential.  
 11 Q Did you do the breakdown of the zones that are  
 12 considered CIB and residential?  
 13 A I did do that breakdown. I'm not going to speak  
 14 specifically to each one without seeing the list  
 15 in front of me, but I encourage you to look at  
 16 it.  
 17 Q Sure. And I'm not sure what list you're talking  
 18 about either. So that might be something we  
 19 need you guys to produce to us after.  
 20 A I would imagine that it's probably on the thumb  
 21 drive.  
 22 Q Well, I think there are several thousand  
 23 documents on the thumb drive so it's kind of --  
 24 I can't tell you whether it's on there or not.  
 25 A Well, county zones are broken down by

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1 residential, multidwelling, single dwelling,  
2 commercial business.  
3 Q So you went through these county zones and you  
4 said, "This one, for purposes of my calculation,  
5 is a CIB; this one is residential"?"  
6 A Uh-huh.  
7 Q For the percentage acres CIB zone, how did you  
8 perform that calculation?  
9 A Yeah. So that's taking the number of -- the  
10 total number of CIB acres and then dividing it  
11 by the total number of acres.  
12 Q Okay. And then what about percentage acres  
13 residential zone? How did you perform that?  
14 A That was taking the residential acres divided by  
15 the total number of acres in the annexation  
16 area.  
17 Q Why did you perform this analysis? Specifically  
18 the CIB, dividing annexation area into CIB acres  
19 and residential acres?  
20 A I can't -- that's privileged with my legal team.  
21 Q Okay. Why is that privileged?  
22 MR. UNGER: I object to the extent that  
23 she's getting into discussions with legal  
24 counsel. You can answer to the extent that you  
25 can answer without getting into discussions with

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1 legal counsel.  
2 A You know, I don't know if I can answer that  
3 question without -- I mean, the decision to make  
4 that was made within discussions with legal.  
5 Q Let's turn to "Parcel Classification  
6 Designation."  
7 How did you, under that category, determine  
8 residential acres?  
9 A Again, I acquired data from the county, the  
10 county parcel layer. Within the county parcel  
11 layer are parcel classification codes. Those  
12 codes are set by the state of Indiana for tax  
13 purposes. And I, looking over the parcel's  
14 classification codes, deemed which were  
15 residential and which were not.  
16 Q Why is there a difference in total number of  
17 residential acre under the parcel classification  
18 designation and the total number of acres under  
19 the CI -- residential acres under zoning  
20 designation?  
21 A Yeah. So zoning -- something can be zoned one  
22 way, right. Like, you can be zoned commercial  
23 but there's a residential parcel within the  
24 zone. So because a lot of times they are  
25 grandfathered in or, like, there's no real

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1 requirement that within the zone, it has to stay  
2 that and only that.  
3 Again, that's -- I'm not -- that's as far  
4 as I know on that topic. But just because  
5 something is zoned fully commercial doesn't mean  
6 that there might not be a multi-family apartment  
7 building within that commercial zoned area.  
8 Q And then "Percentage Acres Residential," again,  
9 is that the residential acres divided by the  
10 total number of acres?  
11 A That's correct.  
12 Q Going to the persons per acre: residential  
13 zoning, how did you perform that calculation?  
14 A That was looking at the residential zoning  
15 acres, divided by -- or, I'm sorry. The total  
16 population divided by the residential acres that  
17 were classified for the zones.  
18 Q Then for resident parcels?  
19 A That would be the total number of people divided  
20 by zones -- the residential zones acreage.  
21 Sorry.  
22 Q Okay. So the residential parcels per person per  
23 acre corresponds to the parcel classification  
24 designation?  
25 A Correct. So this is saying, if you were to only

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1 look at the res -- parcels that can have  
2 residence on them so that they are classified as  
3 residential, if you only looked at that parcel  
4 acreage, how dense is it? How many persons are  
5 on those residential parcels?  
6 There should never be people living in a  
7 parcel that's not designated as residential.  
8 Not saying it would not happen but ...  
9 Q Sure. Turning to the "Percentage Parcel Count  
10 Equal to or less than 1 Acre," how did you  
11 perform that calculation?  
12 A Within the GIS software -- well, so I had the  
13 county parcel layer and within the GIS software,  
14 I ran the Calculate Geometry, which calculates  
15 the area.  
16 In this case, I did the acreage of each of  
17 the parcels and then I simply selected all of  
18 the parcels that were an acre or less in size,  
19 and that came to a count, right. I don't know  
20 the number of parcels off the top of my head.  
21 We'll just say there's 20,000 total parcels and  
22 94 percent of them were an acre or less.  
23 Q Okay. The "Census Urban Areas Designation," can  
24 you explain that area to me?  
25 A Yeah. That's based off of census data. And

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1 it's part of the FTA, Federal Transit Authority.  
 2 They have an urban area designation. It's  
 3 a boundary that they produce; so I just simply  
 4 took that boundary from their website and put  
 5 the annexation area over top of it and said,  
 6 well, what's the area; what's the acreage in  
 7 this urbanized area that falls within annexation  
 8 area? And that's that number. And then what's  
 9 that -- what's the percentage of the annexation  
 10 area in the urban area.  
 11 So in most of the case, over 70 percent of  
 12 the annexation areas fall within the urban area  
 13 designation.  
 14 Q By the FTA?  
 15 A By the FTA.  
 16 Q Why did you perform that calculation?  
 17 MR. UNGER: Objection to the extent it gets  
 18 into discussions with legal counsel. If you can  
 19 answer without getting into discussions with  
 20 legal counsel, you can answer.  
 21 A I can't answer that question.  
 22 Q "Percentage of Unwaivered Remonstrators Opposed  
 23 to Annexation," what are those calculations?  
 24 A That wasn't -- that was based off of a legal  
 25 memo that was presented to me by counsel from

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1 admissions by Monroe County Auditor.  
 2 Q So how did you perform those?  
 3 A I just read their admissions. These numbers are  
 4 actually written in that admission. So I ran  
 5 the calculation only to double check the math  
 6 that was in. This is literally just taken from  
 7 the admission.  
 8 Q Admissions from Monroe County?  
 9 A Yeah.  
 10 Q Ms. Blair, have we discussed all the testimony  
 11 regarding your population density analysis that  
 12 you will present at trial?  
 13 MR. UNGER: Object to the extent it gets  
 14 into attorney legal. But to the extent you can  
 15 answer, you can answer.  
 16 A Everything we've discussed here is the work that  
 17 I've done. I don't know what will be asked from  
 18 me at trial.  
 19 Q Are you going to provide any other or different  
 20 testimony regarding population density in Area  
 21 1A or 1B at trial?  
 22 A Not that I'm aware of.  
 23 Q Ms. Blair, have you performed a subdivision  
 24 analysis of the percentage of territory in Area  
 25 1A that has been subdivided?

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1 A I attempted to look at subdivisions, and the  
 2 county subdivision layer was so erroneous that  
 3 it was impossible to do. I just could not find  
 4 a GIS layer that was accurate.  
 5 Q You said county subdivision layer was so  
 6 erroneous?  
 7 A Inconsistent. There were some subdivisions that  
 8 were missing, subdivisions that were incomplete.  
 9 I just didn't feel like the data was accurate.  
 10 Q Okay. So --  
 11 A Personally and -- yeah.  
 12 Q Is it fair to say you attempted to perform an  
 13 analysis of the percentage of territory in Area  
 14 1A that has been subdivided but that you weren't  
 15 area able to come to a conclusion?  
 16 A Correct.  
 17 Q Is it also fair to say that you attempted to  
 18 perform an analysis of the percentage of  
 19 territory in Area 1B that has been subdivided  
 20 but that you weren't able to come to a  
 21 conclusion?  
 22 A Correct. You can't do GIS work without a  
 23 reliable data source. I mean, otherwise, you're  
 24 doing data that is inaccurate.  
 25 Q So at trial you're not going to provide

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1 testimony on the percentage of the Area 1A or  
 2 Area 1B that is subdivided?  
 3 MR. UNGER: Objection to the extent that  
 4 gets into legal analysis. But to the extent you  
 5 can answer, go ahead.  
 6 A I don't have any plans to at this time.  
 7 Q Do you know how many formally recorded  
 8 subdivision there are in Area 1A?  
 9 A I do not.  
 10 Q What about for Area 1B?  
 11 A I do not.  
 12 Q Did you ever pull those formally recorded  
 13 subdivision plats and calculate the total number  
 14 of acres --  
 15 A No.  
 16 Q -- that are contained? You're just going off of  
 17 the county's data?  
 18 A Correct.  
 19 Q Or you tried to use the county's data?  
 20 A I tried and the only way I found that it would  
 21 have to be accurate would be to go to the plat  
 22 level.  
 23 Q Okay.  
 24 A And I felt that was out of my scope at the time.  
 25 Q Do you know of anyone else within the GIS

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1 division that has performed a subdivision  
 2 analysis for Areas 1A or 1B?  
 3 A I believe nobody has.  
 4 Q Ms. Haley did not?  
 5 A That's a good question. I imagine she probably  
 6 did. I do feel like I remember seeing something  
 7 about the subdivisions.  
 8 Q But you don't know?  
 9 A I don't -- like, I don't remember seeing, like,  
 10 a spreadsheet or something.  
 11 Q Or a map?  
 12 A No, I don't remember ever seeing a map.  
 13 Q Did Mr. Stier perform subdivision analysis for  
 14 Area 1A or 1B?  
 15 A No, he did not.  
 16 Q Ms. Blair, will you provide any testimony at  
 17 trial regarding whether Area 1A or 1B involves  
 18 an economic development project by the City of  
 19 Bloomington?  
 20 MR. UNGER: Object to the extent it asks  
 21 for legal impressions. To the extent you can  
 22 answer, go ahead and answer.  
 23 A Yeah, at this point in time, I do not plan on  
 24 doing any economic -- is that what your --  
 25 economic development?

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1 Q Correct. And so you have you performed an  
 2 analysis of whether Area 1A or 1B involves an  
 3 economic development project by the City of  
 4 Bloomington?  
 5 A I have not done any analysis.  
 6 Q I think we've talked about this one but, did you  
 7 perform an analysis regarding whether Area 1A is  
 8 zoned for commercial business or industrial  
 9 uses?  
 10 A Can you repeat that?  
 11 Q I can do my best. Did you perform an analysis  
 12 regarding whether Area 1A is zoned for  
 13 commercial business or industrial uses?  
 14 A Yes, I did.  
 15 Q Is that the analysis that is contained in  
 16 Exhibit 78?  
 17 A Yes.  
 18 Q Same question for Area 1B, did you perform an  
 19 analysis whether Area 1B is zoned for a  
 20 commercial business or industrial uses?  
 21 A I did, yes.  
 22 Q Is that analysis contained in Exhibit 78?  
 23 A Yes.  
 24 Q Did anyone else work with you on your analysis  
 25 of commercial business or industrial uses for

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1 Area 1A or 1B?  
 2 A No.  
 3 Q Have you performed an analysis of whether Area  
 4 1A or 1B is needed and can be used by the City  
 5 of Bloomington for its development in the  
 6 reasonably near future?  
 7 A No.  
 8 Q Will you provide any testimony at trial  
 9 regarding whether the City of Bloomington needs  
 10 and can use Area 1A or 1B for the development in  
 11 the city's reasonably near future?  
 12 MR. UNGER: Again, object to the extent  
 13 asks for attorney mental impressions. Witness  
 14 doesn't know what she's -- certainly what she's  
 15 going to testify to. To the extent you can  
 16 answer, you can answer.  
 17 A At this point in time, I have no plans to, but I  
 18 don't know what I'm going to be asked at trial.  
 19 Q Are you aware of any development projects the  
 20 City of Bloomington has planned to occur in Area  
 21 1A?  
 22 A I'm not aware of any.  
 23 Q Are you aware of any development projects the  
 24 City of Bloomington has planned to occur in Area  
 25 1B?

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1 A I'm not aware of any.  
 2 Q Have you provided -- performed analysis, rather,  
 3 of whether annexation is in the best interest of  
 4 the owners of land in the proposed territory for  
 5 annexation?  
 6 A I haven't run any analysis.  
 7 Q Have you run any analysis on whether annexation  
 8 will have a significant financial impact on  
 9 residents and owners of land in Area 1A or 1B?  
 10 A I have not run any analysis on that topic.  
 11 Q Will you provide any testimony at trial  
 12 regarding whether annexation is in the best  
 13 interest of owners of land?  
 14 MR. UNGER: Again, object to the extent  
 15 asks for mental impressions of attorneys. To  
 16 the extent you can answer, you can.  
 17 A At this time, I don't have any plans to. And I  
 18 don't know what will occur between now and  
 19 trial.  
 20 Q Will you provide any testimony regarding whether  
 21 annexation will have a significant financial  
 22 impact on residents and owners of land in the  
 23 Area 1A or 1B?  
 24 MR. UNGER: Same objection. You can  
 25 answer.

<p style="text-align: right;">Page 58</p> <p>1 A At this point, I don't have any plans to do that 2 analysis. 3 (Deposition Exhibit 79 marked for 4 identification.) 5 Q Ms. Blair, I'm handing you what's been marked as 6 Exhibit 79. I'll represent to you this is a 7 document titled "Annexation Frequently Asked 8 questions." It's publicly available on the City 9 of Bloomington's website and appears up to date 10 as of October 22, 2021. 11 Have you ever seen this document before? 12 A I have not. 13 Q Did you help prepare this document? 14 A No. 15 Q Do you know anyone in the GIS division who 16 helped prepare this document? 17 A I do not know. If it was as of October 2021, I 18 wasn't working in the GIS division at the time. 19 Q Will you please go to page 7 of Exhibit 79. And 20 under the last bullet point there on page 7, for 21 Area 1A, it says total population is 3,987. 22 Do you see that? 23 A I do. 24 Q Is that a number that you provided? 25 A No.</p>	<p style="text-align: right;">Page 60</p> <p>1 A To me it looks like there's two. 2 Q So we've got two different estimates. 3 A Yeah -- well, this was based on the 2020 Census, 4 and this was not. 5 Q Okay. But this -- and when you said "This was 6 not," you're indicating that -- 7 A I mean, I don't -- I guess I should say I don't 8 know who did this stuff, (indicating) but this 9 was -- I know I did mine on the 2020 Census, and 10 I might -- you know, I know Laura's was not done 11 on the 2020 Census; so ... 12 Q When we go back to page 7 of Exhibit 79, says 13 "Based on the most recent available census 14 data." 15 Do you see that on page 7? 16 A Which bullet point are you on? I don't see. 17 Q If you look at the last bullet point "What is 18 the population of the areas?" 19 A I see, uh-huh. 20 Q "Based on the most recent available census 21 data." 22 A Yeah. To me that's a little vague. I can't 23 speak to that. Because was it the 2019 ACS? 24 Was it the 2010 census? You know, I don't -- I 25 don't know who produced this. I just know that</p>
<p style="text-align: right;">Page 59</p> <p>1 Q Do you know how this number was provided? 2 A I don't know who created this document. 3 Q Okay. What about for, if you go to page 8, Area 4 1B? Did you provide that population estimate? 5 A I did not. 6 Q Do you know who did? 7 A I do not. I don't know who created this 8 document. 9 Q Ms. Blair, looks like we've got three different 10 population estimates for Areas -- each for Areas 11 1A and 1B. We have the population estimates 12 that are in Exhibit 79 in front of you there. 13 We have the population estimates that you've 14 done -- 15 A Uh-huh. 16 Q -- in Exhibit 78, and we have population 17 estimates in Exhibit 77, all of which are 18 different. 19 Can you explain why there are different 20 population estimates for Areas 1A and 1B? 21 A Well, to me it looks like 79 and 77 are the 22 same. So I don't see that we have three 23 different estimates. I see we have -- unless 24 I'm mistaken. 25 Q Sure.</p>	<p style="text-align: right;">Page 61</p> <p>1 the data I saw from Laura was from 2019. 2 MR. HEEB: Let's take a quick break. I'm 3 almost finished. Off the record. 4 (Recess taken from 10:24 a.m. to 5 10:41 a.m..) 6 BY MR. HEEB 7 Q Ms. Blair, I'm looking at these files that are 8 on a USB drive that was produced. There are 9 some files that are in a .dbf format. 10 What is .dbf? 11 A I don't know the exact acronym, but that's a 12 database file. I think it stands for database 13 file. That has to be opened -- that's raw data. 14 Like, that's data that has to be opened in GIS. 15 Q And then what about the .prj file? What's that? 16 A That's a project file. Again, it's -- usually 17 the GIS data has multiple files that are needed 18 to open. It's not, like, just one file. 19 Q And .shp? 20 A Shape. That's, again, part of that GIS data 21 export. 22 Q So to open these files, I need access to your 23 GIS system; correct? 24 A A GIS system. I provided everything with the 25 format in a .csv and also in a GIS format. So</p>



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1 all my data is in both formats.  
2 Q What's a .csv file?  
3 A It's an Excel sheet.  
4 Q But to visualize this data --  
5 A Of course, to visualize GIS data, you have to  
6 put in a GIS system.  
7 Q Right. So if I click on this .dbf file format,  
8 I'm not going to be able to see what you guys  
9 see in the GIS division.  
10 A That's why I included -- no, you won't be able  
11 to see it; that's why I included the .csv so  
12 that you would have a way to visualize it.  
13 Because it's -- like I mentioned before,  
14 GIS is just a database, it just has an XY  
15 coordinate. So the .csv is the exact same data;  
16 it's just not on a map. It's the exact same  
17 thing.  
18 Q And the data you're -- but the documents or data  
19 that you're working with, that's been mapped and  
20 you guys are working off maps; right?  
21 A I work always off of maps. And there are free  
22 softwares that you can use to open it called  
23 QGIS. It's a free software if you don't have a  
24 GIS expert on your legal team.  
25 Q So you are working with maps in your system, but

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1 what's provided is a .csv file to us?  
2 A I provided both. I provided the GIS file, which  
3 is what we just went over -- those shape file,  
4 database file, and project files -- and I also  
5 produced it in a .csv format.  
6 Q But you didn't produce the actual map.  
7 A I mean, if you were to -- I guess the question  
8 is -- I mean, Max created the maps.  
9 If you were to put that in -- that same  
10 project file on a map, all you would see would  
11 be block shapes with annexation boundary on it  
12 or the zoning boundary with annexation on it.  
13 Q If I wanted to look at the specific calculations  
14 that you did with respect to the census blocks  
15 that appear -- some within, some without the  
16 annexation areas -- what file would I look at?  
17 A They're in both. I mean, that field is in the  
18 .csv and in the GIS file.  
19 Q What's the name of that .csv file?  
20 A I mean, I don't know off the -- I'd have to look  
21 at it. I don't know them off the top of my  
22 head, but I named them pretty easy to understand  
23 names.  
24 Q Well, here. Why don't you go ahead and look  
25 here. I'm going to, just for the record -- just

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1 for the record, I'm going to give you my  
2 computer there. And I'm going to come around  
3 here and look over your shoulder.  
4 A Sure.  
5 Q Those are the files that are on that USB drive.  
6 So feel free to click and go through.  
7 A Okay.  
8 Q And see if you can find --  
9 A I'm just going to start from the beginning.  
10 Q Yeah.  
11 A So that looks like -- how do I ...  
12 Q And just going back, what was that map that you  
13 pulled up in the 2023 maps?  
14 A Yeah. This was -- I mentioned earlier in my  
15 meeting and you asked if any maps have been  
16 redone for this deposition. This is the map,  
17 the one map, that was redone because the legend  
18 was not complete.  
19 Q And that map is the Monroe County zoning  
20 districts in 1B?  
21 A Correct.  
22 Q And that map was produced using Monroe County  
23 zoning data?  
24 A Correct, yeah. I'm not sure. I'm going to back  
25 out of that. It's not entirely looking

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1 familiar.  
2 Q Just for the record, you looked at --  
3 A Briefly. I mean, I don't know if you want me to  
4 open up everything in this.  
5 Q No. You were in Bloomington 0004. And so you  
6 tried to open Bloomington\_199304, and that  
7 didn't open.  
8 A Yeah. I'm going to back out and go to the --  
9 MR. UNGER: I'm sorry, object to the  
10 representation. It did open.  
11 THE WITNESS: Yeah. I --  
12 MR. UNGER: It did, okay. So --  
13 MR. HEEB: Well, it opened but there was  
14 nothing on the screen.  
15 THE WITNESS: Well, I mean --  
16 MR. UNGER: I can probably find it --  
17 THE WITNESS: Yeah. I don't --  
18 MR. HEEB: Well, hang on. I want -- we've  
19 asked the witness to try to find it.  
20 MR. UNGER: Okay. Sorry. Go ahead.  
21 THE WITNESS: Okay. Sure. I just -- I  
22 mean, I briefly opened it. I wouldn't say,  
23 like, something didn't open or not. So that  
24 looks like an old folder map.  
25

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1 BY MR. HEEB

2 Q And just, as you are looking, we're looking for

3 your calculations of the census blocks that

4 appear within Area 1A and 1B.

5 A Yeah. I'm just trying to get a sense of what's

6 in here. So we have a bunch of PDFs. We have a

7 bunch of GIS-related files.

8 Okay. That looks like the urbanization

9 summary sheet.

10 Q And that's Bloomington\_189802. That is the 2023

11 urbanization summary that's been marked as

12 Exhibit 78.

13 A This is not anything I produced. So this, I

14 would imagine -- I don't want to speculate, but

15 maybe this is --

16 MR. UNGER: Which is that?

17 MR. HEEB: That's Bloomington\_189807.

18 THE WITNESS: Oh, I think this is the one I

19 just opened. Yep, sorry.

20 This is the same thing but for 1B. I

21 didn't produce this.

22 BY MR. HEEB

23 Q That's Document 189911.

24 A Well, this is definitely Monroe County zoning.

25 Q And this is Document 189817.

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1 A Uh-huh. I mean, I can't say what year this was

2 put in here. And I'm not sure if it was mine or

3 not. But it is county zoning. I don't know

4 which one I was on. What number did we just do?

5 Q We just discussed Document 189817.

6 A Okay. So that was that. Okay. This is -- this

7 looks like the Bloomington 1950 boundary.

8 Q Do you know the significance of the Bloomington

9 1950 boundary?

10 A Okay. I think those annexation ones probably

11 were mine actually. The ones I said weren't.

12 Sorry about that.

13 Yeah, this -- sorry we'll have to go back

14 to those other ones. This is -- I mean, it's

15 hard when you're just looking at data, straight

16 up, to be, like, "Is this something I produced

17 or not?" It's a little challenging --

18 Q So you're looking at Document 189822?

19 A But this is the City of Bloomington boundary

20 from 1950 that we digitized, and here's the

21 source of that. It's a URL. If you were to put

22 that in --

23 Q Why did you digitize the 1950 boundary of the

24 City of Bloomington?

25 MR. UNGER: Objection to the extent it's

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1 asking for mental impressions of attorneys.

2 Q You can answer, if you know.

3 A I believe the expert witness wanted to get a

4 grasp of what the boundary was in 1950. So,

5 yeah, we searched some old archive photos and

6 found that.

7 So, yeah, if we go back up to the one where

8 it was just 1A and 1B, yeah, this is -- this is

9 something I produced. I apologize for that.

10 This is the 1A boundary in an Excel version of

11 it.

12 Q So Document 189807 contains the boundary of

13 Annexation Area 1A?

14 A Yeah. And then the one for 1B might be this

15 one, I think. Yeah.

16 So this is the boundary of 1B. If you were

17 to view it in an Excel sheet, this is what this

18 looks like.

19 Q And that's Document 189811. Just for the

20 record, we're still looking for your

21 calculations of the --

22 A Yeah.

23 Q -- census blocks that are --

24 A I'm sure we're going to get there.

25 Q -- located within Areas 1A and 1B?

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1 A Did we open up 189822?

2 Q I don't know.

3 A Oh, yeah. That's the 1950 boundary. Okay.

4 This one -- let me -- it's Document 189831.

5 Q Okay.

6 A This is a parks and recreation activity report

7 from 2018.

8 Q Is that a document you produced?

9 A I mean, I didn't create this data. This was

10 presented to me from the parks and recreation

11 department.

12 Q Right. But the document itself --

13 A Yes, the document itself, yes.

14 Q You created that?

15 A Yes.

16 Q Why?

17 MR. UNGER: Objection to the extent it

18 calls for mental impressions of attorneys. But

19 you can answer to the extent you can without

20 getting into legal discussions.

21 A Yeah. I don't know if I can discuss this one.

22 Next one is, same thing, parks and recreation

23 data; but this was the 2023 activity report.

24 Q What document number is that?

25 A 189832. This is the same thing for parks

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1 shelter reservation for 2022.

2 Q Why did you produce that?

3 MR. UNGER: Objection to the extent it

4 calls for legal impressions.

5 A 189833, I'm not at liberty to say. This one is

6 a road asset inventory. That's Number 189835.

7 Q Did you produce that or make that document?

8 A I actually don't believe that I did. I mean, I

9 know I submitted this, but I don't know if I

10 actually manipulated anything. This was given

11 to me. I don't think any of this -- this is,

12 like, in its original format. So I produced

13 this to legal, yes. Did I create this, no.

14 This is, again, road data. This is

15 Number 189835. This is data that -- it's roads

16 that are within the county and their -- just

17 attributes about it, its condition. Again, this

18 is not -- this is data I presented to legal, but

19 I did not actually create this. This is from

20 the county.

21 This is another road inventory.

22 Q What document number, sorry?

23 A Yeah. This is Number 189836.

24 189837 is parks and recreation facility

25 rentals from '19 '18, '19, and '22.

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1 189838 is parks and recreation roster data

2 from 2019. List of activities.

3 Q Is that a document you produced?

4 A This data was given to me by the parks and

5 recreation department.

6 Q So these documents we've been talking about,

7 these are compilations of data that other people

8 have provided to you?

9 A Correct. Sorry, I didn't get that number.

10 189839 is also parks and recreation roster

11 report from 2020.

12 So just to go over what these are, it's the

13 person who signed up, just their address for

14 that Red Cross training or whatever the event

15 was.

16 189840 is shelter reservations for the

17 parks and recreation department in 2018.

18 189841: parks and recreation shelter

19 reservations for 2019.

20 189842: parks and recreation shelter

21 reservations 2023.

22 Q Those don't have anything to do with density

23 analysis, do they?

24 A They do not. I forgot to read the number,

25 sorry. Let me get back to that. It was 189843,

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1 and this is -- this is raw census data. So this

2 is from census.gov.

3 Q And is that -- what date is that data?

4 A This is the 2020 Census.

5 Q What tells you that in that document?

6 A Well, I can see that it's got the blocks. So

7 the 2020 Census population is by block. And

8 also, here, "Pop '20" and "Housing '20," those

9 are the fields that they use. Those are the

10 census fields where they put the population

11 number. It's called Pop '20. I believe that

12 was 43.

13 Q Yes.

14 A 189844, okay. So this is block group. This is

15 not mine.

16 Q 189844 is not a document that you produced?

17 A No. No, I did not do anything with assessed --

18 I don't -- I don't know. It says 2023.

19 Q Do you know who produced this?

20 A Oh, okay. Sorry. This must have been -- I did

21 produce this. This just was not anything I

22 analyzed more than this. This was produced for

23 the expert witness.

24 Q Okay.

25 A I forgot that I'd even done this. So this is

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1 the block groups and the tract and the total

2 acreage of those, the total acres that were in

3 the 1950 boundary and the percentage that was in

4 the 1950 boundary.

5 Q Of the census?

6 A Of the 2020 Census.

7 Q Of the 2020 Census tracts?

8 A Tracts, yes, the tracts. Here's the tracts,

9 acreage, and then the assessed value would be

10 from the county parcel assessed value field.

11 189845, this is City of Bloomington

12 employees. I did produce this. And whether or

13 not they lived in the city and whether or not

14 they live in an annexation area.

15 Q Why did you produce that?

16 MR. UNGER: Objection. Calls for

17 discussions with legal counsel or attorney

18 mental impressions. To the extent you can

19 answer without getting into legal discussions,

20 you can answer.

21 Q So the city tracked which of its employees live

22 in proposed Annexation Area 1A and 1B?

23 A The city does not track this, but I ran this

24 analysis this one time.

25 Q Okay.

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1 A 189846. Okay. So this is all of those parks  
 2 and rec department rosters of shelter  
 3 reservations and CPR classes and all of the  
 4 events that park -- parks and recreation tracks  
 5 addresses; this is all in one document. So it's  
 6 basically a summary of those years in one  
 7 document.  
 8 This is something I produced. So those  
 9 other documents were given to me by parks and  
 10 rec staff. This is me taking them and combining  
 11 them, and then geo locating those address to see  
 12 if they fall within the city or the annexation  
 13 area.  
 14 Q Okay.  
 15 A 189847. Okay. This is the county road data  
 16 where we say whether the road was in the  
 17 annexation area or not. So, again, I was taking  
 18 that county road data, that I did not produce,  
 19 that was delivered from the county and just  
 20 located to see whether that road was in the  
 21 annexation area or not.  
 22 Q That was 189847?  
 23 A Yes.  
 24 Q And that is your analysis of county road data?  
 25 A Correct. And as far as my analysis was just to

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1 say whether it existed in annexation area or  
 2 not.  
 3 Q Okay.  
 4 A 189848. Okay. This is an analysis of zoning.  
 5 So this is -- this is my, you know, the zoning  
 6 layer. So the first half of these fields are  
 7 all from Monroe County.  
 8 Q Okay.  
 9 A It's just raw. And then it's joined with the --  
 10 oh, no. This one actually is all just the  
 11 zoning, sorry, and whether it was deemed CIB  
 12 versus residential. And the acres were  
 13 calculated in the GIS software. So, yep. So  
 14 that's what those --  
 15 Q And this is analysis that you performed?  
 16 A Correct.  
 17 Q Based on city -- excuse me. Monroe County --  
 18 A Zoning data.  
 19 Q -- zoning information?  
 20 A Yeah. So everything that was general business,  
 21 this is where you would go and you can see,  
 22 "Well, what group did I put general business  
 23 in," and you can come and look in this. And it  
 24 was listed as -- I ran analysis as it being in  
 25 CIB.

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1 Q Okay.  
 2 A And there's also a residential field as well.  
 3 And then at the bottom -- okay, yeah. That was  
 4 189848.  
 5 189854. Okay. So this is -- the first  
 6 portion of this are fields from our annexation  
 7 layer. And then the next half, it's joined with  
 8 the census block layer. Again, I just -- it's  
 9 all the fields from the census block. At the  
 10 end are my analysis fields. So we have the  
 11 acres of the block. We have the acres of the  
 12 annexation area that's within the block. We  
 13 have the percentage of the annexation areas that  
 14 are in the block. And then we have the  
 15 population, which is the pop -- the acres -- the  
 16 percentage multiplied by the population field.  
 17 And that's it.  
 18 Q By population field?  
 19 A Yeah.  
 20 Q Isn't true, though, Ms. Blair, that population  
 21 is not evenly distributed throughout these  
 22 census blocks?  
 23 MR. UNGER: Objection to the extent it's  
 24 already asked and answered. You can answer.  
 25 Q You can answer, Ms. Blair.

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1 A I already answered that question.  
 2 Q I don't -- I don't --  
 3 A Oh, I have to repeat myself?  
 4 Q Yeah.  
 5 THE WITNESS: Can you repeat what I said?  
 6 MR. HEEB: Well, I don't think you've  
 7 answered --  
 8 THE WITNESS: No, I'm wondering if the  
 9 dictator can just repeat what I said when you  
 10 asked that question earlier.  
 11 BY MR. HEEB  
 12 Q Well, I haven't asked you whether it's true or  
 13 not that population is not evenly distributed  
 14 through a census block?  
 15 A Oh, I thought you had already. Population is  
 16 diverse throughout a census block.  
 17 Q So is that a yes? That it's not evenly  
 18 distributed?  
 19 A It's not evenly distributed.  
 20 Q So Document 189854, is that for your analysis  
 21 for Area 1A and 1B?  
 22 A This is just for 1A.  
 23 Q Okay.  
 24 A So that was 54. 189862.  
 25 Q Did you say 862?

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1 A Sorry, yeah, 862. This is the urban -- the FTA  
 2 urban area. 189872, this is county parcel data.  
 3 So this is county parcel data and assigning it  
 4 whether it was residential or not based on --  
 5 from my analysis.  
 6 Q And whether it's residential or not is analysis  
 7 you performed?  
 8 A Correct.  
 9 Q So we're still looking for your calculations  
 10 regarding census blocks that are in Area 1B?  
 11 A Correct. 189877, this is also county parcel  
 12 data with my analysis of whether it was  
 13 residential or not. I can't tell by looking at  
 14 this, but my guess is one of these is for 1A and  
 15 the other one is for 1B.  
 16 Q So there's nothing in that document that tell  
 17 you whether it's for 1A or 1B?  
 18 A It doesn't seem to be at this time, no. In  
 19 hindsight, I probably should have put titles on  
 20 everything.  
 21 189884, this is another urban area, the  
 22 census urban area designation for the other  
 23 annexation area. One is going to be for 1A and  
 24 one is going to be for 1B.  
 25 189885, this is zoning. This is zoning

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1 classification for CIB versus residential. So  
 2 this, again, is going to be -- I did everything  
 3 in two separate spreadsheets. So I did all my  
 4 analysis for 1A separate from 1B.  
 5 Q Okay. So there should be a --  
 6 A There should be a mirror of everything except  
 7 for, like, the parks and rec stuff and the  
 8 roads; those were combined. When I did my  
 9 analysis for this summary sheet, I did  
 10 everything in separate spreadsheets.  
 11 189892, okay. So here is 1B analysis with  
 12 the census blocks for 2020. This is where the  
 13 1B data is. And, similarly, it has the same  
 14 fields. You have the area -- the acreage of the  
 15 block, the acreage of the annexation area that's  
 16 in that block, the percentage of the acres, the  
 17 annexation acres that are in the block, and then  
 18 the population -- which was calculated as  
 19 multiplying the Pop '20 field by the acres  
 20 percentage field.  
 21 Q Okay.  
 22 A Is that what you want? Do you want me to go  
 23 through more of them? Actually, that was the  
 24 last spreadsheet.  
 25 Q Okay. You said earlier in your deposition that

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1 the GIS division did a small amount of data  
 2 collection and that -- what data source were  
 3 compiled for annexation by the GIS division or  
 4 collected by GIS division?  
 5 A We collected data from census.gov, from the  
 6 census blocks. We got data from Monroe  
 7 County -- sorry -- for the zoning, county  
 8 zoning, and for the county parcel data. We  
 9 acquired -- we digitized the 1950 boundary based  
 10 off of a photo that we found, you know, from a  
 11 historic book. And we -- what else did we learn  
 12 from here? Yeah, the FTA urban area  
 13 designation, that was from their website.  
 14 Q Have you produced all of these?  
 15 A Yeah.  
 16 Q And were there any other raw data collected by  
 17 the GIS division for --  
 18 A For this, no.  
 19 Q You mentioned something that Max Stier made  
 20 visual with respect to some of this data. What  
 21 did Max Stier make visual?  
 22 A So Max made a handful of maps that takes this  
 23 GIS data and makes it so you can see it. So he  
 24 did some basic maps of: here's Monroe County  
 25 boundary; here's the annexation boundary. A map

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1 of: here's the zones on -- nothing edited just  
 2 directly from Monroe County.  
 3 Q Anything else?  
 4 A He did -- I mean, I don't have all the maps in  
 5 front of me on a list, but he did maps about --  
 6 taking this analysis and saying, okay, which  
 7 parcels were residential, and highlighting  
 8 those, versus the nonresidential parcels; which  
 9 zones were CIB versus residential zones.  
 10 So he was taking the analysis I did on  
 11 those fields in that sheet and just visualizing  
 12 that.  
 13 Q Is that primarily how you and Max work: you do  
 14 the analysis; he would do the visualization?  
 15 A In this project, yes.  
 16 Q For annexation, you were the one doing all of  
 17 the analysis; Max was then visualizing data?  
 18 A Correct.  
 19 Q Earlier in the deposition, you said you did not  
 20 remember how many people were in Area 1A or 1B  
 21 based on estimates, and then I showed you  
 22 Exhibit 78.  
 23 Is this -- were these those population  
 24 estimates that you could not remember? Or  
 25 were there others out there?

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1 A These were the populations that I couldn't  
 2 remember on Exhibit 78.  
 3 Q If you can go to Exhibit 76 please, and if you  
 4 could, go to page 2 of that exhibit?  
 5 A Uh-huh.  
 6 Q Under "New Projects," and again, "Annexation  
 7 analysis." It says, "Meeting with Steve planned  
 8 for June 9."  
 9 Who's Steve?  
 10 A That would be Steve Unger.  
 11 Q The next line says, "I have a lot of work to do  
 12 for this in the next two weeks."  
 13 What work did you have to do?  
 14 A All of the analysis that we just went through to  
 15 produce all of the documents that we just walked  
 16 through.  
 17 Q And then go to the next page please. The "OOTM  
 18 Staff viewer," and sub-bullet point there, "we  
 19 plan on including all the census, ACS, EJ  
 20 Screen, Qualified, Urban areas, et cetera data  
 21 on this map."  
 22 What census data were you referencing  
 23 there?  
 24 A So the Office -- it stands for Office Of The  
 25 Mayor Staff Viewer. We have staff maps for

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1 every department. All that was, was just saying  
 2 Max added a whole collection of demographic-type  
 3 data to their map.  
 4 In my mind, reading that, it was probably  
 5 the 2020 Census.  
 6 Q What's ACS?  
 7 A The American Community Survey. So, you know,  
 8 the -- I'm imagining that -- I mean, I don't  
 9 know exactly what years he used. But that's  
 10 what that is.  
 11 Q What is "EJ Screen"?  
 12 A Environmental Justice Screen. It's a federal  
 13 screening tool, and they have a bunch of polygon  
 14 shapes related to low-income areas and  
 15 environmental justice attributes.  
 16 Q What about "Qualified"?  
 17 A Same thing. It's like a federal -- it's, like,  
 18 a qualified federal layer. I'm not entirely  
 19 sure. Off the top of my head, I don't remember  
 20 what that is. We can look at the viewer and  
 21 find out if we need to.  
 22 Q What about the "Urban areas"?  
 23 A That was the FTA Urban area polygon.  
 24 Q And then what other data was upload there?  
 25 A I don't recall, but there was, you know -- none

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1 of this -- nothing that was produced here, in  
 2 this summary sheet, was put on their staff  
 3 viewer. They are two separate things.  
 4 Q The summary sheet that is marked as --  
 5 A Nothing from annexation analysis was put on  
 6 their staff viewer.  
 7 Q Earlier in your deposition, you also said it's  
 8 not possible to count people in the Annexed  
 9 Areas 1A and 1B, why is that?  
 10 A Sorry.  
 11 Q Earlier in your deposition, you said it's not  
 12 possible to perform a door-to-door,  
 13 house-to-house count of people in Areas 1A and  
 14 1B. Why did you say that?  
 15 A I don't believe it's feasible to go door-to-door  
 16 and expect that you're going to get an accurate  
 17 population count.  
 18 Q Isn't that how the federal census is performed?  
 19 A It's true. And I think that the census is the  
 20 most accurate that we can get in the United  
 21 States.  
 22 Q More accurate than a house-to-house count?  
 23 A Yeah.  
 24 Q Why is that?  
 25 A House-to-house count assumes just so many

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1 assumptions: someone is home, they're going to  
 2 answer the door, they are going to be honest.  
 3 The census has federal backing behind it.  
 4 It has penalties. It's required by law.  
 5 There's more for a citizen to be compelled --  
 6 they're legally compelled to fill out the  
 7 census. They're not legally compelled to open  
 8 their door and speak to anybody. Period.  
 9 Q Why do you say "They're legally compelled to  
 10 answer the census"?  
 11 A It's a federal regulation.  
 12 Q Do you know of anyone who's prosecuted for  
 13 not --  
 14 A I cannot --  
 15 Q -- responding to the census?  
 16 A I can't answer question. I don't know.  
 17 Q Do you know how the 2020 federal census was  
 18 performed?  
 19 A I do not.  
 20 Q You referenced directions that were left by  
 21 Ms. Haley after her departure from the GIS  
 22 division. In what format were those directions  
 23 left?  
 24 A We keep documents in something we call KB. I  
 25 don't know what it stands for. She wrote a KB

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1 article, is what we would call it.  
 2 It's basically, like, a web page, where you  
 3 can write information.  
 4 Q Can you produce that to us? Can you produce a  
 5 PDF copy of those directions that Ms. Haley left  
 6 to us?  
 7 A I mean, as far as I know, pretty much everything  
 8 within the City of Bloomington is public  
 9 information. So I would have to speak with my  
 10 director and legal before I could answer that  
 11 question, I guess.  
 12 MR. HEEB: Steve, can you guys produce  
 13 that?  
 14 MR. UNGER: Yeah. Subject to review and  
 15 legal, we'll make sure. But if we don't have  
 16 any objections then --  
 17 THE WITNESS: Yes. Then, yes --  
 18 MR. UNGER: -- we'll look into it.  
 19 BY MR. HEEB  
 20 Q On your Exhibit 78, again, back to the title,  
 21 "2023 Urbanization Summary."  
 22 What does urbanization mean?  
 23 A I mean, I guess to me it means whether an area  
 24 is becoming urbanized, right, like, is it urban?  
 25 The title -- I don't know anything more behind

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1 that.  
 2 Q What makes an area urban versus something else?  
 3 A To me an urban area is developed. It's got --  
 4 it's not rural. It's not agricultural. It's  
 5 got businesses and development, buildings, and  
 6 houses that are an acre or less in size.  
 7 Houses, you know, subdivided. Small parcel  
 8 size.  
 9 Q And this is all --  
 10 A Walmart. I mean, businesses, grocery stores,  
 11 you know. I mean, urbanized people, right.  
 12 It's the opposite of rural and agricultural.  
 13 MR. HEEB: I don't have any other  
 14 questions. Thank you, Ms. Blair.  
 15 MR. UNGER: No questions.  
 16 THE REPORTER: Will the witness read and  
 17 sign?  
 18 MR. UNGER: Yes.  
 19 THE REPORTER: Who is ordering today?  
 20 MR. HEEB: We'll order a copy. Condensed  
 21 E-tran please.  
 22 MR. UNGER: Yes, ma'am.  
 23 (Time noted: 11:28 a.m.)  
 24  
 25

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1 AND FURTHER THE DEPONENT SAITH NOT.  
 2  
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 6 MEGHAN BLAIR  
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1 STATE OF INDIANA )  
 ) SS:  
 2 COUNTY OF MONROE )  
 3 I, Colleen Brady, a Notary Public in and for  
 4 the County of Monroe, State of Indiana at large, do  
 5 hereby certify that MEGHAN BLAIR, the deponent  
 6 herein, was by me first duly sworn to tell the  
 7 truth, the whole truth, and nothing but the truth  
 8 in the aforementioned matter;  
 9 That the foregoing deposition was taken on  
 10 behalf of the Petitioners, at the offices of  
 11 Bloomington City Hall, 401 North Morton Street,  
 12 Room 225, Bloomington, Monroe County, Indiana, on  
 13 the 27th day of March 2024, commencing at the hour  
 14 of 9:01 a.m., pursuant to the Indiana Rules of  
 15 Trial Procedure;  
 16 That said deposition was taken down  
 17 stenographically and transcribed under my  
 18 direction, and that the typewritten transcript is a  
 19 true record of the testimony given by the said  
 20 deponent; and thereafter presented to said deponent  
 21 for her signature;  
 22 That the parties were represented by their  
 23 counsel as aforementioned.  
 24 I do further certify that I am a disinterested  
 25 person in this cause of action; that I am not a

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1 relative or attorney of any party, or otherwise  
 2 interested in the event of this action, and am not  
 3 in the employ of the attorneys for any party.  
 4 IN WITNESS WHEREOF, I have hereunto set my  
 5 hand and affixed my notarial seal on this 11th  
 6 day of March 2024.  
 7  
 8 *Colleen Brady*  
 9 Colleen Brady  
 10  
 11  
 12 Seal, Notary Public My Commission Expires:  
 State of Indiana March 8, 2029  
 13  
 14 Colleen Brady County of Residence:  
 Commission No. NP0732235 Monroe  
 15  
 16  
 17  
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 19  
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 22  
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 25

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1 DEPOSITION REVIEW  
 CERTIFICATION OF WITNESS  
 2  
 3 ASSIGNMENT REFERENCE NO: 6618737  
 CASE NAME: County Residents Against Annexation Inc. Et Al. v.  
 The Common Council Of The City Of Bloomington Et Al.  
 DATE OF DEPOSITION: 3/27/2024  
 4 WITNESS' NAME: Meghan Blair  
 5 In accordance with the Rules of Civil  
 Procedure, I have read the entire transcript of  
 6 my testimony or it has been read to me.  
 7 I have made no changes to the testimony  
 as transcribed by the court reporter.  
 8  
 9 Date Meghan Blair  
 10 Sworn to and subscribed before me, a  
 Notary Public in and for the State and County,  
 11 the referenced witness did personally appear  
 and acknowledge that:  
 12  
 13 They have read the transcript;  
 They signed the foregoing Sworn  
 Statement; and  
 14 Their execution of this Statement is of  
 their free act and deed.  
 15  
 16 I have affixed my name and official seal  
 17 this \_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.  
 18  
 19 Notary Public  
 Commission Expiration Date  
 20  
 21  
 22  
 23  
 24  
 25

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1 Veritext Legal Solutions  
 2 1100 Superior Ave  
 Suite 1820  
 3 Cleveland, Ohio 44114  
 Phone: 216-523-1313  
 4  
 5 April 11, 2024  
 6 To: Mr. Unger  
 7  
 8 Case Name: County Residents Against Annexation Inc. Et Al. v. The  
 Common Council Of The City Of Bloomington Et Al.  
 9 Veritext Reference Number: 6618737  
 Witness: Meghan Blair Deposition Date: 3/27/2024  
 10  
 11 Dear Sir:  
 12 Enclosed please find a deposition transcript. Please have the witness  
 13 review the transcript and note any changes or corrections on the  
 14 included errata sheet, indicating the page, line number, change, and  
 15 the reason for the change. Have the witness' signature notarized and  
 16 forward the completed page(s) back to us at the Production address  
 shown  
 17 above, or email to production-midwest@veritext.com.  
 18  
 19 If the errata is not returned within thirty days of your receipt of  
 20 this letter, the reading and signing will be deemed waived.  
 21  
 22 Sincerely,  
 23 Production Department  
 24  
 25 NO NOTARY REQUIRED IN CA

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1 DEPOSITION REVIEW  
 CERTIFICATION OF WITNESS  
 2  
 3 ASSIGNMENT REFERENCE NO: 6618737  
 CASE NAME: County Residents Against Annexation Inc. Et Al. v.  
 The Common Council Of The City Of Bloomington Et Al.  
 DATE OF DEPOSITION: 3/27/2024  
 4 WITNESS' NAME: Meghan Blair  
 5 In accordance with the Rules of Civil  
 Procedure, I have read the entire transcript of  
 6 my testimony or it has been read to me.  
 7 I have listed my changes on the attached  
 Errata Sheet, listing page and line numbers as  
 8 well as the reason(s) for the change(s).  
 9 I request that these changes be entered  
 as part of the record of my testimony.  
 10  
 11 I have executed the Errata Sheet, as well  
 as this Certificate, and request and authorize  
 that both be appended to the transcript of my  
 12 testimony and be incorporated therein.  
 13  
 14 Date Meghan Blair  
 15 Sworn to and subscribed before me, a  
 Notary Public in and for the State and County,  
 16 the referenced witness did personally appear  
 and acknowledge that:  
 17 They have read the transcript;  
 They have listed all of their corrections  
 18 in the appended Errata Sheet;  
 They signed the foregoing Sworn  
 19 Statement; and  
 Their execution of this Statement is of  
 20 their free act and deed.  
 21 I have affixed my name and official seal  
 22 this \_\_\_\_ day of \_\_\_\_\_, 20\_\_\_\_.  
 23  
 24 Notary Public  
 Commission Expiration Date  
 25



1 ERRATA SHEET  
2 VERITEXT LEGAL SOLUTIONS MIDWEST

3 ASSIGNMENT NO: 6618737

4 PAGE/LINE(S) / CHANGE /REASON

5 \_\_\_\_\_

6 \_\_\_\_\_

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17 \_\_\_\_\_

18 \_\_\_\_\_

19 \_\_\_\_\_

20 Date \_\_\_\_\_  
Meghan Blair

21 SUBSCRIBED AND SWORN TO BEFORE ME THIS \_\_\_\_\_

22 DAY OF \_\_\_\_\_, 20\_\_\_\_.

23 \_\_\_\_\_

Notary Public

24 \_\_\_\_\_

25 \_\_\_\_\_  
Commission Expiration Date

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Indiana Rules of Trial Procedure  
Depositions Upon Oral Examination

Rule 30

(e) Submission to witness--Changes--Signing.

(1) When the testimony is fully transcribed, the deposition shall be submitted to the witness for reading and signing and shall be read to or by him, unless such reading and signing have been waived by the witness and by each party. "Submitted to the witness" as used in this subsection shall mean (a) mailing of written notification by registered or certified mail to the witness and each attorney attending the deposition that the deposition can be read and examined in the office of the officer before whom the deposition was taken, or (b), mailing the original deposition, by registered or certified mail, to the witness at an address designated by the witness or his attorney, if requested to do so by the witness, his attorney, or the party taking the deposition.

(2) If the witness desires to change any answer in the deposition submitted to him, each change, with a statement of the reason therefor, shall be made

by the witness on a separate form provided by the officer, shall be signed by the witness and affixed to the original deposition by the officer. A copy of such changes shall be furnished by the officer to each party.

(3) If the reading and signing have not been waived by the witness and by each party the deposition shall be signed by the witness and returned by him to the officer within thirty (30) days after it is submitted to the witness. If the deposition has been returned to the officer and has not been signed by the witness, the officer shall execute a certificate of that fact, attach it to the original deposition and deliver it to the party taking it. In such event, the deposition may be used by any party with the same force and effect as though it had been signed by the witness.

(4) In the event the deposition is not returned to the officer within thirty (30) days after it has been submitted to the witness, the reporter shall execute a certificate of that fact and cause the certificate to be delivered to the party taking it. In such event, any party may use a copy of the

deposition with the same force and effect as though  
the original had been signed by the witness.

DISCLAIMER: THE FOREGOING CIVIL PROCEDURE RULES  
ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.  
THE ABOVE RULES ARE CURRENT AS OF APRIL 1,  
2019. PLEASE REFER TO THE APPLICABLE STATE RULES  
OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS

COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

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