

**IN THE UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF TEXAS  
EL PASO DIVISION**

LEAGUE OF UNITED LATIN AMERICAN  
CITIZENS, *et al.*,

*Plaintiffs,*

v.

GREG ABBOTT, in his official capacity as  
Governor of the State of Texas, *et al.*,

*Defendants.*

CIVIL ACTION NO.  
3:21-cv-00259-DCG-JES-JVB  
[Consolidated Action: Lead Case]

**FAIR MAPS PLAINTIFFS' NOTICE OF DESIGNATION  
OF TESTIFYING EXPERTS**

Pursuant to the Court's December 17, 2021 Scheduling Order, ECF No. 96, and the Parties' May 10, 2022 Joint Stipulation Modifying Expert Deadlines, ECF No. 268, Plaintiffs Fair Maps Texas Action Committee, OCA-Greater Houston, the North Texas Chapter of the Asian Pacific Islander Americans Public Affairs Association, Emgage, Khanay Turner, Angela Rainey, Austin Ruiz, Aya Eneli, Sofia Sheikh, Jennifer Cazares, Niloufar Hafizi, Lakshmi Ramakrishnan, Amatullah Contractor, Deborah Chen, Arthur Resa, Sumita Ghosh, and Anand Krishnaswamy (collectively, "Fair Maps Plaintiffs"), through their undersigned counsel, hereby designate the following testifying experts in this case:

## **I. Retained Expert Witnesses**

1. Loren Collingwood, PhD.  
Associate Professor of Political Science at the University of New Mexico.  
1 University of New Mexico  
Albuquerque, NM 87131  
lcollingwood@unm.edu  
Dr. Collingwood will testify regarding his report and file materials served under separate cover on May 20, 2022.
  
2. Monica Martinez, PhD.  
Associate Professor of History at the University of Texas at Austin.  
128 Inner Campus Dr. B7000  
Austin, TX 78712  
monica.martinez1@austin.utexas.edu  
Dr. Martinez will testify regarding her report and file materials served under separate cover on May 20, 2022.
  
3. Doug Spencer, PhD.  
Associate Professor of Law at the University of Colorado, Boulder.  
Wolf Law Building | 401 UCB  
2450 Kitteredge Loop Road  
Boulder, CO 80309  
douglas.spencer@colorado.edu  
Dr. Spencer will testify regarding his report and file materials served under separate cover on May 20, 2022.

## **II. Non Retained Expert Witnesses**

The Fair Maps Plaintiffs hereby designate and state that they intend to call for the purpose of fact and/or opinion testimony those persons listed in the witness disclosures of each party, as appropriate. Fair Maps Plaintiffs specifically give notice that they intend to rely on the expert testimony of other Plaintiffs groups. To streamline trial presentation and not present overly duplicative testimony, Fair Maps Plaintiffs will rely on expert opinions given by other Plaintiffs and their counsel. The designation of experts, reports, and expert disclosures served by other Plaintiffs are incorporated herein for all purposes. Fair Maps Plaintiffs make this designation without conceding the qualifications,

reliability, relevancy, or admissibility of such witness' opinions.

**III. Supplementation and Amendment Disclaimer**

Fair Maps Plaintiffs specifically reserve the right to supplement and/or amend these designations, including the expert reports provided with these designations, to review, assess, and incorporate as necessary any discovery that becomes available after this designation.

Pursuant to the Court's December 17, 2021 Scheduling Order, Fair Maps Plaintiffs shall on this day serve on all parties, but not file, the materials required by Federal Rule of Civil Procedure 26(a)(2)(B).

Dated: May 20, 2022

Respectfully submitted.

*/s/ David Donatti*

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CERTIFICATE OF SERVICE

I hereby certify that I filed this document using the Court's ECF System, and that a copy of this filing was served on all counsel of record through that system on May 20, 2022.

/s/ David Donatti  
David Donatti