

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
GALVESTON DIVISION**

DICKINSON BAY AREA BRANCH §
NAACP, et al., §
§
Plaintiffs, §
§
v. § Civil Action No. 3:22-cv-117- JVB
§
GALVESTON COUNTY, TEXAS, et al., §
§
Defendants. §

TERRY PETTEWAY, et al., §
§
Plaintiffs, §
§
v. § Civil Action No. 3:22-cv-57-JVB
§ [Lead Consolidated Case]
§
GALVESTON COUNTY, TEXAS, et al. §
§
Defendants. §

UNITED STATES OF AMERICA, §
§
Plaintiff, §
§
v. § Civil Action No. 3:22-cv-93-JVB
§
GALVESTON COUNTY, TEXAS, et al. §
§
Defendants. §

NAACP PLAINTIFFS' NOTICE OF DESIGNATION OF TESTIFYING EXPERTS

Pursuant to Federal Rule of Civil Procedure 26, the Amended Scheduling Order dated July 15, 2022, ECF No. 66, and by agreement of the Parties on December 12, 2022, Plaintiffs Dickinson Bay Area Branch NAACP, Galveston Branch NAACP, Mainland Branch NAACP, Galveston LULAC Council 151, Edna Courville, Joe A. Compian, and Leon Phillips (“NAACP Plaintiffs”), through their undersigned counsel, hereby designate the following testifying experts in this case:

I. Retained Expert Witnesses

1. William S. Cooper
P.O. Box 16066
Bristol, VA 24209
Email: bcooper@msn.com
Mr. Cooper will testify regarding his report and file materials served under separate cover on January 13, 2023.
2. Kassra AR Oskooii, Ph.D.
Associate Professor
Department of Political Science & International Relations
Director of POSCIR Internships
Affiliated Faculty at the Center for Political Communication (CPC)
Affiliated Faculty at the Center for the Study of Diversity (CSD)
University of Delaware
Email: kassrao@gmail.com
Dr. Oskooii will testify regarding his report and file materials served under separate cover on January 13, 2023.
3. LaFleur Stephens-Dougan, Ph.D.
Associate Professor
Department of Politics
Associate Director of Graduate Studies
214 Fisher Hall
Princeton, NJ 08544
Princeton University
Email: lafleur.stephens@gmail.com
Dr. Stephens-Dougan will testify regarding her report and file materials served under separate cover on January 13, 2023.
4. Traci Burch, Ph.D.
Associate Professor

Department of Political Science
210 Scott Hall
601 University Pl.
Evanston, IL 60208
Weinberg College of Arts & Sciences
Northwestern University
Email: traci.burch@gmail.com

Dr. Burch will testify regarding her report and file materials that will be served under separate cover on January 27, 2023, by agreement of the parties.

II. Non Retained Expert Witnesses

NAACP 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. NAACP 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. The designation of experts, reports, and expert disclosures served by other Plaintiffs are incorporated herein for all purposes. NAACP Plaintiffs make this designation without conceding the qualifications, reliability, relevancy, or admissibility of such witnesses' opinions.

III. Supplementation and Amendment Disclaimer

NAACP 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 Amended Scheduling Order dated July 15, 2022, ECF No. 66, and by agreement of the Parties on December 12, 2022, NAACP Plaintiffs shall serve on all parties, but not file, the materials required by Federal Rule of Civil Procedure 26(a)(2)(B) on the dates specified above in Section I.

Dated: January 13, 2023.

Respectfully Submitted,

/s/ Sarah Xiyi Chen

TEXAS CIVIL RIGHTS PROJECT

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COUNSEL FOR PLAINTIFFS

*admitted *pro hac vice*

CERTIFICATE OF SERVICE

I hereby certify that on January 13, 2023, a true and correct copy of this *Notice of Designation of Testifying Experts* was filed with the Clerk of the Court using the CM/ECF system, which will send a notification of this filing to all counsel of record in this case.

/s/ Sarah Xiyi Chen