

UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION

TEXAS DEMOCRATIC PARTY;)
BOYD L. RICHIE, in his capacity as)
Chairman of the Texas Democratic)
Party; HARRIS COUNTY DEMOCRATIC)
PARTY;)
GERALD BIRNBERG, in his capacity as)
Chairman of the Harris County)
Democratic Party; J. GOODWILLE)
PIERRE; ALEXANDRA GIBBS;)
JEFFREY T. VANSCHOONHOVEN;)
BONI SUE LESZCZUK; and ERIC J.)
GALLOWAY)

Plaintiffs,)

VS.)

Cause No. 4:08-CV-03332

LEO VASQUEZ, in his capacity as)
Harris County Tax Assessor Collector)
and Harris County Voter Registrar)

Defendant.)

ORAL DEPOSITION OF
ELIZABETH HERNANDEZ
MARCH 10, 2009

ORAL DEPOSITION OF ELIZABETH HERNANDEZ, produced as a witness at the instance of the PLAINTIFFS, was taken in the above-styled and numbered cause on March 10, 2009, from 9:57 a.m. to 12:50 p.m., before Lori Childers, Certified Shorthand Reporter in and for the State of Texas, reported by computerized stenotype machine at the offices of Clinton Gambill, 1019 Congress, 15th Floor, Houston, Texas 77002, pursuant to the Federal Rules of Civil Procedure.

1 Q You weren't involved in the request?

2 A No.

3 Q Would it have been Frances, if anyone was involved in
4 that?

5 A Probably Mr. Johnson, Ed Johnson.

6 Q Is it fair to say that Mr. Johnson is actively
7 involved in managing your department?

8 A Yes.

9 Q Other than Mr. Johnson and Frances, who were the
10 other fairly active managers of the department?

11 A Mr. Johnson's pretty much the one that does
12 everything. Hammerlein doesn't really do too much. Chris
13 German's kind of active in doing things, as well.

14 Q Any others?

15 A No, that's about it.

16 Q When Mr. Bettencourt was in office, how would you
17 describe his involvement or supervision of the registration
18 office?

19 A I hardly ever seen him go in our office.

20 Q Did you receive any communications, memos, E-mails,
21 et cetera from him?

22 A Regarding?

23 Q Voter registration.

24 A Yeah, we would get memos every once in a while.

25 Q And some of these memos would come from