

EXHIBIT V

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION

DAWN CURRY PAGE, et al.

Plaintiffs,

vs.

VIRGINIA STATE BOARD OF
ELECTIONS, et al.

Defendants

Civil Action No.:
3:13-cv-678

DEPOSITION OF GLORIA PERSON-HUBALLAH

March 31, 2014

1:40 p.m.

CERTIFIED COPY

Taken at:

OFFICE OF THE ATTORNEY GENERAL
900 East Main Street
Richmond, Virginia 23219

REPORTED BY: HELEN B. YARBROUGH, RPR, CCR, CLR

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1 calls for a legal conclusion.

2 **A Not fully, no.**

3 Q Have you ever heard the term or the phrase
4 "ability to elect candidates of choice"?

5 **A I haven't heard that, no.**

6 Q Have you ever heard the phrase, the term,
7 "retrogression"?

8 **A No.**

9 Q Are you familiar with the process that
10 Virginia followed in 2012 for obtaining Justice
11 Department preclearance or approval for its district
12 lines?

13 MR. ROCHE: Objection to the extent it
14 calls for a legal conclusion.

15 **A No.**

16

17 (Person-Huballah Deposition Exhibit 1
18 is marked.)

19

20 Q I will hand you now what's been labeled as
21 Exhibit 1, and it appears to be the complaint that was
22 filed on your behalf in this case. Do you agree?

23 **A Yes.**

24 Q Have you seen that complaint before today?

25 **A Yes.**

1 Q When did you see that complaint?

2 A I've had this for a while, a few months. A
3 few months.

4 Q "A few months," meaning two months? Three
5 months? Four months?

6 A About three months.

7 Q Three months. Had you seen the complaint
8 prior to it being filed on your behalf?

9 A No.

10 Q Did you review it in preparation for the
11 deposition today?

12 A Yes.

13 Q How many times?

14 A A couple.

15 Q Did you participate in preparing the
16 complaint at all?

17 A Did I participate?

18 Q Uh-huh.

19 A I read it --

20 Q Before it was filed --

21 A -- and talked to my attorney.

22 Q Before it was filed, did you participate in
23 preparing it?

24 A Before it was filed, yes.

25 Q With the court?

1 **A** **I'm sorry?**

2 **Q** Before it was filed with the court in 2013?

3 **A** **I'm not understanding. I'm so sorry.**

4 **Q** That's okay. This complaint was filed on
5 your behalf with the court?

6 **A** **Yes. Yes. Yes. Yes.**

7 **Q** That's what initiated this lawsuit?

8 **A** **Correct.**

9 **Q** Prior to it being filed, did you participate
10 in preparing the complaint?

11 **A** **Oh. Yeah. I'm sorry.**

12 **Q** So you have seen it before it was filed with
13 the court, correct? I think your earlier testimony
14 was that you had not seen it before it being filed
15 with the court.

16 **A** **You said preparing before it was filed.**

17 **Q** Right.

18 **A** **So preparing, I would assume, talking about
19 the complaint, not the actual complaint.**

20 **Q** Okay. So your testimony is you helped with
21 preparations for the complaint prior to it being
22 filed, but you never saw the complaint before it was
23 filed; is that correct?

24 **A** **Yes. That's better, yes.**

25 **Q** Is there anything in the complaint, in the

1 allegations made in the complaint on your behalf that
2 you disagree with?

3 **A No. No.**

4 MR. MELIS: Let's make these 2 and 3.

5

6 (Person-Huballah Deposition Exhibits 2
7 and 3 are marked.)

8

9 Q We've marked as Exhibit 2 Plaintiffs'
10 Objections and Responses to Defendants'
11 Interrogatories and Requests for Production, and we've
12 marked as Exhibit 3, Plaintiffs' Objections and
13 Responses to Intervenor-Defendant Congressman's Eric
14 Cantor's Interrogatories and Requests for Production.
15 Have you seen those before today?

16 **A No. No.**

17 Q Will you agree with me that what you are
18 looking at, if you flip through it, is a series of
19 questions and requests and then answers and responses
20 made on your behalf? Will you agree with that?

21 **A Made on my behalf?**

22 Q Correct.

23 **A Oh, made on my behalf. I guess so, yes.**

24 Q So had you seen -- I understand you haven't
25 seen those documents before. But the questions and