

<p style="text-align: right;">Page 1</p> <p>1 UNITED STATES DISTRICT COURT</p> <p>2 FOR THE NORTHERN DISTRICT OF ALABAMA</p> <p>3 SOUTHERN DIVISION</p> <p>4</p> <p>5 EVAN MILLIGAN, et al., )</p> <p>6 Plaintiffs, )</p> <p>7 ) CASE NO:</p> <p>8 VS. ) 2:21-CV-01530-AMM:</p> <p>9 WES ALLEN, in his official)</p> <p>10 capacity as Alabama )</p> <p>11 Secretary of State. )</p> <p>12 Defendant. )</p> <p>13 MARCUS CASTER, et al., )</p> <p>14 Plaintiffs, )</p> <p>15 ) CASE NO:</p> <p>16 VS. ) 2:21-CV-1536-AMM</p> <p>17 WES ALLEN, in his official)</p> <p>18 capacity as Alabama )</p> <p>19 Secretary of State. ) DEPOSITION OF:</p> <p>20 Defendant. ) LEE LAWSON</p> <p>21</p> <p>22 S T I P U L A T I O N S</p> <p>23</p> <p>24 IT IS STIPULATED AND AGREED, by and</p> <p>25 between the parties through their respective counsel,</p>	<p style="text-align: right;">Page 3</p> <p>1 A P P E A R A N C E S</p> <p>2</p> <p>3 FOR THE MILLIGAN PLAINTIFFS:</p> <p>4 DAYTON CAMPBELL-HARRIS</p> <p>5 DAVIN ROSBOROUGH</p> <p>6 Attorneys at Law</p> <p>7 American Civil Liberties Union</p> <p>8 Voting Rights Project</p> <p>9 125 Broad Street</p> <p>10 18th Floor</p> <p>11 New York, New York 10004</p> <p>12 425-516-8400</p> <p>13 dcampbell-harris@aclu.org</p> <p>14 drosborough@aclu.org</p> <p>15</p> <p>16 BRITTANY CARTER</p> <p>17 TANNER LOCKHEAD</p> <p>18 Attorneys at Law</p> <p>19 NAACP Legal Defense &amp; Educational Fund, Inc.</p> <p>20 40 Rector Street</p> <p>21 5th Floor</p> <p>22 New York, New York 10006</p> <p>23 212-965-2200</p> <p>24 bcarter@naacpldf.org</p> <p>25 tlockhead@naacpldf.org</p>
<p style="text-align: right;">Page 2</p> <p>1 that the deposition of:</p> <p>2 LEE LAWSON,</p> <p>3 may be taken before Merit Gilley, Commissioner and</p> <p>4 Notary Public, State at Large, with all parties</p> <p>5 appearing remotely, on the 10th day of August, 2023,</p> <p>6 commencing at approximately 8:10 a.m.</p> <p>7</p> <p>8 IT IS FURTHER STIPULATED AND AGREED that</p> <p>9 the signature to and reading of the deposition by the</p> <p>10 witness is waived, the deposition to have the same</p> <p>11 force and effect as if full compliance had been had</p> <p>12 with all laws and rules of Court relating to the</p> <p>13 taking of depositions.</p> <p>14</p> <p>15 IT IS FURTHER STIPULATED AND AGREED that</p> <p>16 it shall not be necessary for any objections to be</p> <p>17 made by counsel to any questions, except as to form or</p> <p>18 leading questions, and that counsel for the parties</p> <p>19 may make objections and assign grounds at the time of</p> <p>20 the trial, or at the time said deposition is offered</p> <p>21 in evidence, or prior thereto.</p> <p>22 ***</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 4</p> <p>1 DEUEL ROSS</p> <p>2 Attorney at Law</p> <p>3 NAACP Legal Defense &amp; Educational Fund, Inc.</p> <p>4 700 14th Street N.W.</p> <p>5 Suite 600</p> <p>6 Washington, DC 20005</p> <p>7 202-682-1300</p> <p>8 dross@naacpldf.org</p> <p>9</p> <p>10 LATISHA GOTELL FAULKS</p> <p>11 Attorney at Law</p> <p>12 American Civil Liberties Union of Alabama</p> <p>13 P.O. Box 6179</p> <p>14 Montgomery, Alabama 36106-0179</p> <p>15 334-265-2754</p> <p>16 tgfaulks@aclualabama.org</p> <p>17</p> <p>18 HARMONY A. GBE</p> <p>19 Attorney at Law</p> <p>20 Hogan Lovells US, LLP</p> <p>21 1999 Avenue of the Stars</p> <p>22 Suite 1400</p> <p>23 Los Angeles, California 90067</p> <p>24 310-785-4600</p> <p>25 harmony.gbe@hoganlovells.com</p>

<p>Page 5</p> <p>1 AMANDA NECOLE ALLEN  2 Attorney at Law  3 Hogan Lovells US, LLP  4 Columbia Square  5 555 Thirteenth Street NW  6 Washington, DC 20004  7 202-637-2521  8 amanda.n.allen@hoganlovells.com  9  10  11 FOR THE CASTER PLAINTIFFS:  12 JYOTI JASRASARIA  13 Attorney at Law  14 Elias Law Group  15 250 Massachusetts Avenue NW  16 Suite 400  17 Washington DC 20001  18 202-968-4552  19 jjasrasaria@elias.law  20  21  22  23  24  25</p>	<p>Page 7</p> <p>1  2 EXAMINATION INDEX  3  4 Lee Lawson  5 BY MR. CAMPBELL-HARRIS . . . . . 9  6  7  8  9  10  11  12 EXHIBIT INDEX  13  14  15  16  17  18  19  20  21  22  23  24  25</p> <p>MAR</p> <p>14 Plaintiffs' Exhibit  15 1 Defendants' Joint Response to Milligan 25  and Caster Plaintiffs' Objections and  Request for Preliminary Injunction  16  17 2 Declaration of Lee Lawson 26  18  19  20  21  22  23  24  25</p>
<p>Page 6</p> <p>1 FOR THE DEFENDANT SECRETARY WES ALLEN:  2 CHARLES MCKAY  3 Assistant Attorney General  4 Alabama Attorney General's Office  5 501 Washington Avenue  6 Montgomery, Alabama 36104  7 334-242-7300  8  9  10 ALSO PRESENT:  11 Robert Pacheco - Esquire Video Specialist  12  13  14  15  16  17  18  19  20  21  22  23  24  25</p>	<p>Page 8</p> <p>1 I, Merit Gilley, a Court Reporter of  2 Birmingham, Alabama, and a Notary Public for the State  3 of Alabama at Large, acting as Commissioner, certify  4 that on this date, as provided by the Federal Rules of  5 Civil Procedure and the foregoing stipulation of  6 counsel, there came before me on the 10th day of  7 August, 2023, with all parties appearing remotely,  8 commencing at approximately 8:10 a.m., LEE LAWSON,  9 witness in the above cause, for oral examination,  10 whereupon the following proceedings were had:  11 THE VIDEOGRAPHER: We are now on the  12 video record. Today's date is August the 10th, 2023.  13 The time is 8:10 a.m. Central standard time. This  14 begins the videoconference deposition of Lee Lawson in  15 the matter of Evan Milligan, et al. versus Wes Allen,  16 et al.  17 My name is Robert Pacheco. I am the remote  18 videographer. Your court reporter today is going to  19 be Ms. Merit Gilley; both representing Esquire  20 Deposition Solutions. Would counsel please introduce  21 yourselves and your affiliation and, the witness will  22 be sworn in.  23 MR. CAMPBELL-HARRIS: My name is Dayton  24 Campbell-Harris, and I represent the Milligan  25 plaintiffs in this matter.</p>

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<p style="text-align: right;">Page 9</p> <p>1 MR. MCKAY: My name is Charles McKay, 2 and I represent Secretary Allen in this matter. 3 MS. JASRASARIA: Hi. This is Jyoti 4 Jasrasaria. I represent the Caster plaintiffs in this 5 matter. 6 MR. ROSBOROUGH: Good morning. Davin 7 Rosborough For the Milligan plaintiffs. 8 LEE LAWSON, 9 being first duly sworn, was examined and testified as 10 follows: 11 THE COURT REPORTER: All right. Usual 12 stipulations? 13 MR. CAMPBELL-HARRIS: Yes. 14 MR. MCKAY: Yes. 15 THE COURT REPORTER: Go ahead. 16 MR. CAMPBELL-HARRIS: Excellent. 17 EXAMINATION 18 BY MR. CAMPBELL-HARRIS: 19 Q Mr. Lawson, have you been deposed 20 before? 21 A Never have. 22 Q Okay. And you understand that today you 23 are testifying under oath? 24 A I do. 25 Q You understand that you should give the</p>	<p style="text-align: right;">Page 11</p> <p>1 answers to my questions so that our court reporter can 2 help us make a nice clear record. For example, 3 instead of giving any head nods or saying, "Uh-huh," 4 provide a verbal response; okay? 5 A Okay. 6 Q Relatedly, we should strive not to talk 7 over one another. There are challenges posed by our 8 remote setup, which is just inherent in the nature of 9 it. But I'll ask that you listen to my questions, and 10 then I will listen to your answer. 11 And we'll just try our hardest not to 12 speak over one another; is that okay? 13 A That's okay. 14 Q Excellent. 15 So you understand that we're gathered 16 here virtually for the purpose of taking your 17 deposition testimony; correct? 18 A I understand that. Yes. 19 Q And if you do not understand a question, 20 please tell me. 21 Otherwise, I'll assume you understand; 22 okay? 23 A Okay. 24 Q If any attorney makes an objection, you 25 must still answer the question.</p>
<p style="text-align: right;">Page 10</p> <p>1 same seriousness and truthfulness in answering my 2 questions here today as you would as if you were 3 testifying in court before a judge or jury; is that 4 correct? 5 A That is correct. 6 Q Is there anything that I should know 7 about you not being able to understand my questions or 8 being unable to answer -- answer truthfully this 9 morning? 10 A No. 11 Q And are you represented by counsel here 12 today? 13 A Am I represented by counsel? 14 Q That is correct. 15 A I mean, I -- I'm not represented by 16 counsel. No. 17 Q Okay. I'm going to go over some of the 18 ground rules just so you're aware of the rules of the 19 game today. So just to make sure we're on the same 20 page; I'm going to be asking you a series of 21 questions, and you're going to answer them to the best 22 of your ability. 23 Do you understand that? 24 A Yes. 25 Q I'm going to ask that you provide verbal</p>	<p style="text-align: right;">Page 12</p> <p>1 Do you understand that? 2 A I do. 3 Q And please let us know if at any point 4 you need a break. 5 If there's a question pending, you'll 6 need to answer it before you take that break; okay? 7 A Okay. 8 Q Excellent. 9 Do you understand all these instructions 10 that we just discussed? 11 A I do. 12 Q Excellent. 13 With that out of the way, do you 14 understand, Mr. Lawson, that you are here today 15 testifying in the case Milligan et al. V. Allen? 16 A Yes, I understand that. 17 Q And may I ask where you are right now? 18 A I'm in my office in Fairhope, Alabama. 19 Q Okay. And is there anyone else in this 20 room with you? 21 A There is not. 22 Q And do you have any email, chat, text, 23 or instant messaging functions currently open? 24 A I do not. 25 Q Okay. I have some questions for you</p>

<p style="text-align: right;">Page 13</p> <p>1 about how you prepared for the deposition today.</p> <p>2 Well, first of all, did you prepare for</p> <p>3 today's deposition?</p> <p>4 A I did not.</p> <p>5 Q Did you meet with any attorneys?</p> <p>6 A I had two conversations with Charles</p> <p>7 McKay.</p> <p>8 Q And did you meet with anyone who is not</p> <p>9 an attorney to prepare for today's deposition?</p> <p>10 A The only phone call or meeting that I --</p> <p>11 it wasn't a meeting. I called my counsel, Britton</p> <p>12 Bonner, at Adams &amp; Reese -- he represents the Baldwin</p> <p>13 County Economic Developmental Alliance to make sure --</p> <p>14 that there was no problem with me being a part of this</p> <p>15 deposition today from a -- an organizational</p> <p>16 perspective.</p> <p>17 Q Okay. I want to circle back to the</p> <p>18 conversations you had with Charles McKay.</p> <p>19 About how long were those conversations?</p> <p>20 A Roughly 15 minutes or less each</p> <p>21 conversation.</p> <p>22 Q Okay. And do you recall when those</p> <p>23 conversations occurred?</p> <p>24 A One of the conversations took place two</p> <p>25 days ago, and one of them took place a week ago.</p>	<p style="text-align: right;">Page 15</p> <p>1 A Did I review any documents to prepare</p> <p>2 for the deposition today?</p> <p>3 That's your question?</p> <p>4 Q That is my question. Correct.</p> <p>5 A Just reviewed my declaration.</p> <p>6 Q Okay. Did you do any -- anything else</p> <p>7 to prepare for today's deposition?</p> <p>8 A I have not.</p> <p>9 Q Okay. And are you being compensated by</p> <p>10 anyone for being here today?</p> <p>11 A I am not.</p> <p>12 Q Excellent.</p> <p>13 I'm going to pivot to some personal</p> <p>14 background questions.</p> <p>15 <b>Redacted</b></p> <p><b>Redacted</b></p>
<p style="text-align: right;">Page 14</p> <p>1 Q Okay. And can you describe the contents</p> <p>2 of those conversations?</p> <p>3 A The contents to -- how so?</p> <p>4 Q What you both discussed?</p> <p>5 A So, again, Charles and I discussed this</p> <p>6 case. Again, it's been in the news a lot; so I'm</p> <p>7 familiar with it. And we discussed me actually making</p> <p>8 a declaration and then being subpoenaed for this</p> <p>9 deposition, or being asked to participate in this</p> <p>10 deposition I guess.</p> <p>11 Q What aspects of the case did you two</p> <p>12 discuss around that?</p> <p>13 MR. MCKAY: Object to form.</p> <p>14 Q (By Mr. Campbell-Harris) You can</p> <p>15 answer.</p> <p>16 A I mean, the discussions on our phone</p> <p>17 calls were related to how the deposition would go. I</p> <p>18 mean, that was our latest conversation. I've never</p> <p>19 been deposed before; so I had several questions about,</p> <p>20 you know, how does a deposition work; you know, TV</p> <p>21 versus reality. Prior to that our first conversation</p> <p>22 was around this case and what -- the declaration that</p> <p>23 I made and some of the contents of it.</p> <p>24 Q Did you review any documents to prepare</p> <p>25 you for the deposition today?</p>	<p style="text-align: right;">Page 16</p> <p><b>Redacted</b></p>

<p>Redacted</p> <p>RedactedR</p>	<p>Page 17</p> <p>1 A -- to the best of my knowledge.</p> <p>2 Q Thank you.</p> <p>3 You mentioned that you went to Troy</p> <p>4 University.</p> <p>5 Is that the highest level of education</p> <p>6 you've completed?</p> <p>7 A Yes. I -- I've attended several</p> <p>8 economic development courses at other universities,</p> <p>9 but nothing beyond an undergraduate degree.</p> <p>10 Q Did you receive any certificates from</p> <p>11 those additional courses?</p> <p>12 A Yes.</p> <p>13 Q Do you mind stating what those</p> <p>14 certificates are to the best of your recollection?</p> <p>15 A Yeah. Completed the economic</p> <p>16 development institute through the University of</p> <p>17 Oklahoma and the Auburn economic development intensive</p> <p>18 course through Auburn University.</p> <p>19 Q And what was your major at Troy</p> <p>20 University?</p> <p>21 A Major in communications with a minor in</p> <p>22 public relations.</p> <p>23 Q Any mi -- oh, public relations was your</p> <p>24 minor?</p> <p>25 A That's correct.</p>
<p>Redacted</p> <p>11 Have you been involved in any other</p> <p>12 lawsuits?</p> <p>13 A Lawsuits?</p> <p>14 Q Yeah. Legal actions?</p> <p>15 A Yes. I had one dispute with a landlord</p> <p>16 in Montgomery over a rental property.</p> <p>17 Q And when was that?</p> <p>18 A Gosh, that was 2007, 2008 --</p> <p>19 Q Okay.</p> <p>20 A -- somewhere in that neighborhood.</p> <p>21 Q And that was the only lawsuit that</p> <p>22 you've been a party of?</p> <p>23 There's no other occasions?</p> <p>24 A That's correct --</p> <p>25 Q Thank you.</p>	<p>Page 18</p> <p>Page 20</p> <p>1 Q Were you a member of any clubs or teams</p> <p>2 at the school?</p> <p>3 A My freshman year I lettered in</p> <p>4 basketball, and then I was a part of the sigma chi</p> <p>5 fraternity and in the fraternity council.</p> <p>6 Q Excellent.</p> <p>7 What do you currently do for work?</p> <p>8 A My title is the president and CEO of the</p> <p>9 Baldwin County Economic Development Alliance.</p> <p>10 Q Do you mind if I refer to the Baldwin</p> <p>11 County Economic Development Alliance as BCEDA?</p> <p>12 A Yes, sir. Or you can -- or the EDA is</p> <p>13 -- is for short.</p> <p>14 Q EDA? Okay.</p> <p>15 And what is the EDA?</p> <p>16 A The EDA is a 501(c)(6) not-for-profit</p> <p>17 entity that is charged -- is for all</p> <p>18 economic-development-related purposes for all of</p> <p>19 Baldwin County.</p> <p>20 Q And what are your responsibilities as</p> <p>21 president of the EDA?</p> <p>22 A Directly, my responsibilities are to run</p> <p>23 the organization, hire and fire the staff, and oversee</p> <p>24 all of the fiduciary responsibilities of the</p> <p>25 organization.</p>

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<p style="text-align: right;">Page 21</p> <p>1 Q And when you say "run the organization,"</p> <p>2 does that include approving and reviewing reports</p> <p>3 published by the EDA?</p> <p>4 A That is correct.</p> <p>5 Q Okay. What other roles have you had at</p> <p>6 the EDA?</p> <p>7 A Previously, I was a project manager here</p> <p>8 on the staff.</p> <p>9 Q And how many staff members are currently</p> <p>10 working for the EDA?</p> <p>11 A We currently have a staff of six.</p> <p>12 Q Okay. And how have your</p> <p>13 responsibilities changed from project manager to now</p> <p>14 being president?</p> <p>15 A Can you repeat the question, please.</p> <p>16 Q Yes.</p> <p>17 How have your responsibilities changed</p> <p>18 since you started working at the EDA?</p> <p>19 A Well, I mean, the difference between</p> <p>20 project manager and president of the organization are</p> <p>21 vastly different. You know, from a project manager</p> <p>22 standpoint; the scope of my job was very narrow,</p> <p>23 working projects and related to that. As president of</p> <p>24 the organization, I'm responsible to oversee all</p> <p>25 facets of the organization.</p>	<p style="text-align: right;">Page 23</p> <p>1 Energy.</p> <p>2 Q And what did you do at the company?</p> <p>3 A I was responsible for economic</p> <p>4 development efforts in the 37-county service territory</p> <p>5 of Power South Energy.</p> <p>6 Q Are all those counties located in</p> <p>7 Alabama or spread out -- okay.</p> <p>8 A That's correct. Yeah. Just the Alabama</p> <p>9 territory for Power South Energy.</p> <p>10 Q Okay. Before coming to the EDA as a</p> <p>11 project manager then, what were you doing for work?</p> <p>12 I know you stated it before, but can you</p> <p>13 restate it for the record?</p> <p>14 A Sure. I worked for the Jefferson County</p> <p>15 Industrial Development Authority.</p> <p>16 Q And what was your title there?</p> <p>17 A Gosh, I think I was a project manager</p> <p>18 there I think was my title.</p> <p>19 Q Okay. And can you describe what your</p> <p>20 duties or responsibilities were as a project manager.</p> <p>21 A Yeah. The Jefferson County IDA is</p> <p>22 charged with developing industrial parks within</p> <p>23 Jefferson County. And as a project manager there, I</p> <p>24 oversaw the development of our parks; the marketing of</p> <p>25 those properties; and, when we had interested parties,</p>
<p style="text-align: right;">Page 22</p> <p>1 Q And how long have you worked at the EDA?</p> <p>2 A Combined, 14 years.</p> <p>3 Q And do you have any other jobs</p> <p>4 currently?</p> <p>5 A I do not.</p> <p>6 Q Okay. Where did you work immediately</p> <p>7 before coming to the EDA?</p> <p>8 A I worked for the Jefferson County</p> <p>9 Industrial Development Authority.</p> <p>10 Q And --</p> <p>11 A Are you -- wait. Wait. Let me rephrase</p> <p>12 that. Which time? Because I worked at the EDA two</p> <p>13 separate times.</p> <p>14 Are you talking about my stint before</p> <p>15 being president and CEO or my stint before being</p> <p>16 project manager?</p> <p>17 Q Oh, sorry.</p> <p>18 Did you work continuously at the EDA</p> <p>19 from project manager to president?</p> <p>20 A I did not.</p> <p>21 Q What did you do in between both</p> <p>22 positions?</p> <p>23 A Yeah. So after being project manager</p> <p>24 here at the EDA, I worked as an economic development</p> <p>25 representative for a company called Power South</p>	<p style="text-align: right;">Page 24</p> <p>1 working with them to locate them within those</p> <p>2 industrial parks.</p> <p>3 Q Okay. How long did you work there?</p> <p>4 A Roughly two years.</p> <p>5 Q Okay. And when -- you can just give me</p> <p>6 the year.</p> <p>7 When did you leave?</p> <p>8 A The Jefferson County IDA?</p> <p>9 Q Yes.</p> <p>10 A It would have been 2016.</p> <p>11 Q And do you mind stating why you left?</p> <p>12 A I'm sorry 2006. I'm sorry.</p> <p>13 Q Thank you.</p> <p>14 A Not '16. I apologize. 2006.</p> <p>15 I took a job here at the EDA as project</p> <p>16 manager.</p> <p>17 Q Okay. Do you mind describing what you</p> <p>18 know about the lawsuit at issue today?</p> <p>19 MR. MCKAY: Object to form.</p> <p>20 Q (By Mr. Campbell-Harris) You can</p> <p>21 answer.</p> <p>22 A What I know about the lawsuit is based</p> <p>23 on news reports and -- and conversations that have</p> <p>24 been had amongst stakeholders in our region about what</p> <p>25 the lawsuit would mean for -- for our geography and --</p>



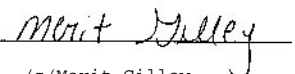
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<p style="text-align: right;">Page 25</p> <p>1 and for the Congressional districts.</p> <p>2 Q And how long have you been involved?</p> <p>3 A Involved in what?</p> <p>4 Q This legal action?</p> <p>5 A Roughly two weeks since making the</p> <p>6 declaration.</p> <p>7 Q And let's transition to your</p> <p>8 declaration.</p> <p>9 Did you produce a declaration as a part</p> <p>10 of Alabama's response to plaintiff's objections?</p> <p>11 A Yes, I did.</p> <p>12 Q Okay. I'm going to mark and share my</p> <p>13 screen here and publish an exhibit. Give me a moment.</p> <p>14 (Plaintiffs' Exhibit 1 was</p> <p>15 marked for identification.)</p> <p>16 Q Okay. Are you seeing the declaration?</p> <p>17 A Yes. I can see --</p> <p>18 Q I'm showing you the --</p> <p>19 A -- your screen.</p> <p>20 Q -- legal filing. Sorry.</p> <p>21 Have you seen this document before?</p> <p>22 A How many page -- how many pages is that</p> <p>23 document? 73?</p> <p>24 Q That is correct.</p> <p>25 A I have not seen a 73-page document. No.</p>	<p style="text-align: right;">Page 27</p> <p>1 A I did not.</p> <p>2 Q Okay. And you signed this declaration</p> <p>3 at the bottom; correct?</p> <p>4 A I did.</p> <p>5 Q And you signed the declaration under the</p> <p>6 penalty of perjury?</p> <p>7 A That is correct.</p> <p>8 Q Thank you. I'm going to stop sharing my</p> <p>9 screen.</p> <p>10 Who contacted you about submitting a</p> <p>11 declaration?</p> <p>12 A The Alabama Attorney General's office.</p> <p>13 Q And do you remember the individual's</p> <p>14 name?</p> <p>15 A The first individual I spoke with at the</p> <p>16 Attorney General's office name was Edmund -- gosh,</p> <p>17 what is Edmund's last name? I can look it up if you</p> <p>18 want me to. I'm trying to remember Edmund's last</p> <p>19 name. I just had the one initial conversation; the</p> <p>20 other conversation has been with Charles McKay.</p> <p>21 Q Was it Eddie LaCour?</p> <p>22 A Yes. That's right.</p> <p>23 Q And is --</p> <p>24 A I don't know him as -- I don't know him</p> <p>25 as Eddie. I know him as Edmund.</p>
<p style="text-align: right;">Page 26</p> <p>1 Q Okay. I'm going to stop sharing my</p> <p>2 screen now. Thank you. And I'm going to show you</p> <p>3 another document that I think you might be more</p> <p>4 familiar with, and I'm going to put it in the chat.</p> <p>5 Marking this document as Exhibit 2.</p> <p>6 (Plaintiff's Exhibit 2 was</p> <p>7 marked for identification.)</p> <p>8 Q Have you seen this document before?</p> <p>9 A I have.</p> <p>10 Q And do you recognize this exhibit as</p> <p>11 your declaration?</p> <p>12 A I haven't seen every page of this</p> <p>13 document that you're scrolling; but, yes, the first</p> <p>14 page does look like my declaration.</p> <p>15 Q And did you draft this document?</p> <p>16 A I had -- I provided content for this</p> <p>17 document. Yes.</p> <p>18 Q How did you provide content for the</p> <p>19 document?</p> <p>20 MR. MCKAY: Object to form.</p> <p>21 A Through conversations with the Attorney</p> <p>22 General's office and -- and then also through, you</p> <p>23 know, putting some of this data and facts together.</p> <p>24 Q (By Mr. Campbell-Harris) Did you type</p> <p>25 out the declaration?</p>	<p style="text-align: right;">Page 28</p> <p>1 Q Understand.</p> <p>2 Was there anyone else that you spoke</p> <p>3 with at the Alabama Attorney General's office?</p> <p>4 A No. Just Edmund and Charles McKay.</p> <p>5 Q Did you speak with anyone else</p> <p>6 representing the state of Alabama?</p> <p>7 A I have not.</p> <p>8 Q And you were contacted two weeks ago?</p> <p>9 A Roughly.</p> <p>10 Q What were you told was the purpose of</p> <p>11 your declaration?</p> <p>12 MR. MCKAY: Object to form.</p> <p>13 A The purpose of my declaration was to</p> <p>14 have an economic development professional add data and</p> <p>15 context to why Mobile, Baldwin Counties, and south</p> <p>16 Alabama are communities of interest.</p> <p>17 Q (By Mr. Campbell-Harris) Okay. And</p> <p>18 were you told to say anything in your declaration?</p> <p>19 A No, I was not specifically. I was asked</p> <p>20 to give my perspective as an economic developer as to</p> <p>21 why south Alabama, specifically Mobile and Baldwin</p> <p>22 Counties, economically are -- and geographically are</p> <p>23 tied together through economic development but also</p> <p>24 workforce development and my perspective and</p> <p>25 background as a professional economic developer down</p>

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<p style="text-align: right;">Page 29</p> <p>1 here for a combined 14 years and why Mobile and 2 Baldwin County are uniquely tied together from an 3 economic development perspective. 4 Q Thank you. I'm going to pivot to some 5 of the more recent developments in the case if that's 6 okay. 7 Did you attend the public hearing on 8 July 13th, in 2023? 9 A No, I did not. 10 Q And did you review the enacted 2023 11 Congressional map for Alabama? 12 A Which map is that? 13 Q Well, let me pivot back, actually, to 14 the previous question. 15 Did you attend any public hearings for 16 redistricting in the past two years? 17 A I have not. No. 18 Q Okay. Okay. I think that's all my 19 questions for today. 20 MR. CAMPBELL-HARRIS: I'm ready to pass 21 over the witness if anyone else has questions. 22 MS. ALLEN: No questions for me. Thank 23 you. 24 MR. MCKAY: Could I get just two minutes 25 and then come back on, and I -- I don't think I'll</p>	<p style="text-align: right;">Page 31</p> <p>1 at this time, but we'll get back to you all by the end 2 of the day if that changes. 3 MR. MCKAY: All right. Someone came 4 into the room and told me do not need an expedited 5 copy, so cancel that. 6 THE VIDEOGRAPHER: This concludes 7 today's videotaped deposition. The time is 8:42 a.m. 8 Going off the record now. 9 (THE DEPOSITION WAS CONCLUDED AT 8:42 A.M.) 10 11 12 13 14 15 16 17 18 19 20 21 22 23 24 25</p>
<p style="text-align: right;">Page 30</p> <p>1 have questions, but could I just get two minutes off 2 the record? 3 THE VIDEOGRAPHER: Going off video 4 record; 8:37 a.m. 5 (Short recess.) 6 THE VIDEOGRAPHER: We are now back on 7 video record; 8:41 a.m. 8 MR. MCKAY: And we have no more 9 questions. 10 THE VIDEOGRAPHER: And before we go off 11 the record, would anybody like to order the transcript 12 or the video at this time? 13 MR. CAMPBELL-HARRIS: Yes, please. The 14 Milligan plaintiffs would like to order an expedited 15 copy of both. 16 MR. MCKAY: And we'll -- we'll take an 17 expedited copy as well. 18 THE VIDEOGRAPHER: Both counsel? 19 MR. CAMPBELL-HARRIS: Yes, please. 20 THE VIDEOGRAPHER: Counsel for Alabama 21 Attorney General's office? 22 MR. MCKAY: Yes. 23 THE VIDEOGRAPHER: Okay. 24 MS. JASRASARIA: Yes. And I'm with the 25 Caster plaintiffs. I think we'll hold off on ordering</p>	<p style="text-align: right;">Page 32</p> <p>1 2 C E R T I F I C A T E 3 4 STATE OF ALABAMA ) 5 JEFFERSON COUNTY ) 6 7 I hereby certify that the above 8 and foregoing deposition was taken down 9 by me in stenotype, and the questions and 10 answers thereto were reduced to computer 11 print under my supervision, and that the 12 foregoing represents a true and correct 13 transcript of the deposition given by 14 said witness upon said hearing. 15 16 I further certify that I am 17 neither of counsel nor of kin to the 18 parties to the action, nor am I in 19 anyway interested in the result of said 20 cause. 21 22  23 /s/Merit Gilley 24 Merit Gilley, Commissioner 25 ACCR NO. 67</p>