

DERRICK TURNER
MILLIGAN V. ALLENAugust 26, 2024
DISTRICT COURT
N.D. OF ALABAMA
1-4

<p style="text-align: right;">Page 1</p> <p>1 N THE UNITED STATES DISTRICT COURT</p> <p>2 NORTHERN DISTRICT OF ALABAMA</p> <p>3 SOUTHERN DIVISION</p> <p>4</p> <p>5 NO. 2:21-CV-01530-AMM</p> <p>6</p> <p>7 EVAN MILLIGAN, et al.,</p> <p>8 Plaintiffs,</p> <p>9 Vs.</p> <p>10 WES ALLEN, et al.,</p> <p>11 Defendants.</p> <p>12</p> <p>13</p> <p>14 VIDEOTAPED REMOTE DEPOSITION OF:</p> <p>15 DERRICK TURNER</p> <p>16 AUGUST 26, 2024</p> <p>17 10:17 A.M.</p> <p>18</p> <p>19</p> <p>20</p> <p>21 REPORTED BY:</p> <p>22 Cindy C. Jenkins, CCR</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 3</p> <p>1 S T I P U L A T I O N S</p> <p>2 (continued)</p> <p>3</p> <p>4 IT IS FURTHER STIPULATED AND AGREED</p> <p>5 that it shall not be necessary for any</p> <p>6 objections except as to form or leading</p> <p>7 questions, and that counsel for the parties</p> <p>8 may make objections and assign grounds at the</p> <p>9 time of the trial, or at the time said</p> <p>10 deposition is offered in evidence or prior</p> <p>11 thereto.</p> <p>12</p> <p>13 IT IS FURTHER STIPULATED AND AGREED</p> <p>14 that the notice of filing of the deposition by</p> <p>15 the Commissioner is waived.</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 2</p> <p>1 S T I P U L A T I O N S</p> <p>2</p> <p>3 IT IS STIPULATED AND AGREED by and</p> <p>4 between the parties through their respective</p> <p>5 counsel, that the deposition of Derrick Turner</p> <p>6 may be taken before Cindy C. Jenkins,</p> <p>7 Commissioner, at 501 Washington Avenue,</p> <p>8 Montgomery, Alabama, on the 26th day of</p> <p>9 August, 2024.</p> <p>10</p> <p>11 IT IS FURTHER STIPULATED AND AGREED</p> <p>12 that the signature to and the reading of the</p> <p>13 deposition by the witness is not waived, the</p> <p>14 deposition to have the same force and effect</p> <p>15 as if full compliance had been had with all</p> <p>16 laws and rules of Court relating to the taking</p> <p>17 of depositions.</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 4</p> <p>1 A P P E A R A N C E S</p> <p>2</p> <p>3 APPEARING ON BEHALF OF THE MILLIGAN</p> <p>4 PLAINTIFFS:</p> <p>5 NAACP LEGAL DEFENSE & EDUCATIONAL FUND</p> <p>6 Mr. Deuel Ross</p> <p>7 700 14th Street, Northwest</p> <p>8 Suite 600</p> <p>9 Washington, DC 20005</p> <p>10 dross@naacpldf.org</p> <p>11</p> <p>12 NAACP LEGAL DEFENSE &</p> <p>13 EDUCATIONAL FUND, INC.</p> <p>14 Ms. Kathryn Sadasivan</p> <p>15 40 Rector Street, 5th Floor</p> <p>16 New York, New York 10006</p> <p>17 212-965-2200</p> <p>18 ksadasivan@naacpldf.org</p> <p>19</p> <p>20 APPEARING ON BEHALF OF THE CASTER PLAINTIFFS:</p> <p>21 ELIAS LAW GROUP LLP</p> <p>22 Mr. Jyoti Jasrasaria</p> <p>23 250 Massachusetts Avenue, Northwest</p> <p>24 Suite 400</p> <p>25 Washington, D.C. 20001</p> <p>26 jposimato@elias.law</p>

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A P P E A R A N C E S

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(continued)

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WITNESS

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DERRICK TURNER

4

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5

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PROCEEDINGS

2

AUGUST 26, 2024

10:17 A.M.

3

EXAMINATION BY MS. SADASIVAN:

4

Q. Okay. Good afternoon -- or I

5

guess it's still kind of like early morning

6

there, it's 10:00 a.m. -- Mr. Turner. And

7

we're on the record. Today is August 26,

8

2024, and it is 10:17 a.m. central time.

9

Thank you for being here today.

10

Could you please spell and state your name for

11

the record?

12

A. It's D-e-r-r-i-c-k, T-u-r-n-e-r.

13

And that's Derrick Turner.

14

Q. Thank you, Mr. Turner. My name is

15

Kathryn Sadasivan, and I'm an attorney with

16

the Legal Defense Fund. I represent the

17

Milligan plaintiffs in Milligan versus Allen

18

in the Northern District of Alabama.

19

Would you just mind just sharing

20

your date of birth and address?

21

MS. MESSICK: Kathryn, before you

22

get started with your questions, could we

23

agree to the usual stipulations, except that

24

Mr. Turner may wish to read and sign, and we

25

would encourage him to do so.

Page 8

1

MS. SADASIVAN: Sure. It's -- the

2

usual stipulations are fine. I assume you

3

mean just that all objections except to form

4

or privilege are reserved?

5

MS. MESSICK: You were a little

6

muffled. But I think you said --

7

MS. SADASIVAN: I'm sorry. The

8

usual stipulations being that objections other

9

than to form or with respect to privilege are

10

reserved?

11

MS. MESSICK: That is part of the

12

usual stipulations. My understanding is it's

13

also a bunch of technical stuff about what the

14

court reporter has do the transcript. And we

15

have been agreeing to the usual stipulations

16

in the other depositions this case.

17

MS. SADASIVAN: Okay. Well, so,

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with respect to the transcript, the read and

19

sign is fine and, you know, kind of with the

20

objections I just shared. If you have

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specifics that you'd like in addition, if you

22

can just let me know what those are. But

23

otherwise, we'll keep going.

24

Q. So, Mr. Turner, would you mind

25

just sharing your date of birth.

<p style="text-align: right;">Page 9</p> <p>1 A. [REDACTED]</p> <p>2 Q. And thank you so much.</p> <p>3 And Mr. Turner, what's your</p> <p>4 address?</p> <p>5 A. [REDACTED],</p> <p>6 [REDACTED]. That's Daphne,</p> <p>7 Alabama, Da-p-h-n-e, 36526.</p> <p>8 Q. And Daphne, Alabama, is that in</p> <p>9 the county of Baldwin?</p> <p>10 A. Yes, Baldwin County.</p> <p>11 Q. Okay. Have you ever been deposed</p> <p>12 before, Mr. Turner?</p> <p>13 A. No, I have not.</p> <p>14 Q. No, you haven't.</p> <p>15 Okay. So I'm going to start with</p> <p>16 a few like logistical points about depositions</p> <p>17 before we jump into the substance of my</p> <p>18 questions today. So everything that we say is</p> <p>19 being transcribed by the court reporter, who I</p> <p>20 believe you've met, which means we'll just</p> <p>21 need to speak clearly and avoid speaking over</p> <p>22 one another. Do you understand that?</p> <p>23 A. Yes.</p> <p>24 Q. So, because our conversation is</p> <p>25 being transcribed, any response to my question</p>	<p style="text-align: right;">Page 11</p> <p>1 just say so. We'll do our best to make sure</p> <p>2 that we get you out of here quickly. And</p> <p>3 we're very grateful of your time. But should</p> <p>4 you need a break, I just ask that if I've</p> <p>5 asked you a question, you answer that question</p> <p>6 before taking your break. Does that make</p> <p>7 sense to you?</p> <p>8 A. Yeah, I understand.</p> <p>9 Q. Okay. And then, if you don't</p> <p>10 understand a question that I ask you, please</p> <p>11 say so. If you answer the question, I will</p> <p>12 assume that you understood what I was asking.</p> <p>13 Does that make sense?</p> <p>14 A. It does.</p> <p>15 MS. MESSICK: Object to the form.</p> <p>16 Q. (By Ms. Sadasivan) Can you think</p> <p>17 of any reason why you might not be able to</p> <p>18 understand or respond accurately and</p> <p>19 truthfully to my questions today?</p> <p>20 A. No.</p> <p>21 Q. Okay. So did you do anything to</p> <p>22 prepare for today's deposition?</p> <p>23 A. I did go over how to handle a</p> <p>24 deposition, but nothing with specifics of the</p> <p>25 case.</p>
<p style="text-align: right;">Page 10</p> <p>1 must be verbal, which means that, you know,</p> <p>2 uh-huh or huh-uh and nods, shakes of the head</p> <p>3 can't be recorded. So I just ask that you say</p> <p>4 any response to my question verbally. Do you</p> <p>5 understand that?</p> <p>6 A. I understand.</p> <p>7 Q. Okay. There are other attorneys</p> <p>8 that are attending this deposition over zoom.</p> <p>9 Jyoti, I believe, is representing the Caster</p> <p>10 plaintiffs in this action. If counsel or</p> <p>11 others, your counsel, or Ms. Messick object or</p> <p>12 have anything to say or the Caster plaintiffs</p> <p>13 over zoom start speaking after I complete</p> <p>14 asking you a question, please give them a</p> <p>15 moment to voice their objections on the record</p> <p>16 before answering. Does that make sense to</p> <p>17 you?</p> <p>18 A. It does.</p> <p>19 Q. Okay. So once those objections</p> <p>20 are stated, you should go ahead and answer the</p> <p>21 question that I ask you unless I withdraw it</p> <p>22 or unless your counsel tells you not to</p> <p>23 answer. Do you understand that?</p> <p>24 A. I do.</p> <p>25 Q. Okay. And if you need a break,</p>	<p style="text-align: right;">Page 12</p> <p>1 Q. Okay. When you say you went over</p> <p>2 how to handle a deposition, who did -- did you</p> <p>3 go over that with somebody?</p> <p>4 A. Yes.</p> <p>5 Q. Who?</p> <p>6 A. Don Harrison and Misty.</p> <p>7 Q. Okay. And how -- who is Don</p> <p>8 Harrison?</p> <p>9 A. Don Harrison is the deputy</p> <p>10 secretary for the Department of Labor.</p> <p>11 Q. Is that your counsel today?</p> <p>12 A. Now, that, I'm not sure. Are</p> <p>13 they representing -- are they my attorneys,</p> <p>14 or -- I thought I was just a neutral party</p> <p>15 that was brought in to answer.</p> <p>16 Q. Okay.</p> <p>17 A. So I don't know specifically if</p> <p>18 they are representing me. I wouldn't answer</p> <p>19 it that way.</p> <p>20 Q. Okay. You weren't told that Don</p> <p>21 Harrison was representing you specifically?</p> <p>22 A. Correct. That's correct.</p> <p>23 Q. Okay. And how many -- did you</p> <p>24 meet in person with Mr. Harrison and</p> <p>25 Ms. Messick?</p>

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<p style="text-align: right;">Page 13</p> <p>1 A. Yes, I did. Well, with 2 Mr. Harrison. And over zoom with Ms. Misty. 3 I'm sorry, Misty, what's your last name? 4 MS. MESSICK: Messick. 5 THE WITNESS: Messick. 6 Q. (By Ms. Sadasivan) Okay. 7 And how many times did you meet in 8 person with Mr. Harrison? 9 A. Just one prior to today. 10 Q. Just one prior to today. And was 11 that the same instance where you were on a 12 zoom call as well with Ms. Messick? 13 A. Yes. 14 Q. Okay. What did you discuss with 15 Mr. Harrison? 16 MS. MESSICK: Objection. 17 Attorney/client privilege and common interest. 18 MR. HARRISON: And I join the 19 objection based on attorney/client privilege 20 and common interest. 21 MS. SADASIVAN: And are you 22 instructing Mr. Turner not to answer? 23 MS. MESSICK: Yes. 24 MR. HARRISON: Yes. 25 Q. (By Ms. Sadasivan) Okay.</p>	<p style="text-align: right;">Page 15</p> <p>1 answer that question? 2 A. I'll follow the advice of 3 counsel. 4 Q. Okay. So you were contacted or 5 you spoke with Mr. Harrison twice; is that 6 right? 7 MS. MESSICK: Object to the form. 8 Q. (By Ms. Sadasivan) I'll rephrase. 9 You were contacted by Mr. Harrison 10 twice about this case; right? 11 MS. MESSICK: Object to the form. 12 Q. (By Ms. Sadasivan) You can answer. 13 A. Yes. 14 Q. And the first time was two weeks 15 ago? 16 A. To the best of my knowledge, it 17 was two weeks ago. 18 Q. Okay. And the second time was 19 about -- was yesterday? 20 A. No. 21 MS. MESSICK: Object to the form. 22 THE WITNESS: I'm sorry. 23 Q. (By Ms. Sadasivan) When was the 24 second time you met with Mr. Harrison and 25 Ms. Messick?</p>
<p style="text-align: right;">Page 14</p> <p>1 How did -- how did Mr. -- how were 2 you contacted about this case? 3 A. Over telephone call. 4 Q. And when was that? 5 A. I'm going to say approximately 6 two weeks ago. I don't know a specific date. 7 I'd have to look up a specific date, but I 8 know it was approximately two weeks ago. 9 Q. Okay. And who contacted you? 10 A. Attorney Harrison. 11 Q. And was anyone else on that call? 12 A. No. 13 Q. And what did he say? 14 MS. MESSICK: Object. 15 MR. HARRISON: Object to 16 attorney/client privilege. 17 MS. SADASIVAN: Well, Mr. Turner 18 just mentioned that he doesn't -- he is not 19 represented by Mr. Harrison, and it's also, 20 you know, a privilege that Mr. Turner can 21 claim. 22 MR. HARRISON: I do represent 23 Mr. Turner. 24 MS. SADASIVAN: Okay. 25 Q. Mr. Turner, do you choose not to</p>	<p style="text-align: right;">Page 16</p> <p>1 A. It was the phone call, and that 2 was approximately -- a week ago 3 approximately. I hate to give you a wrong 4 date. 5 Q. Sure. And how long was that first 6 phone call with Mr. Harrison? 7 A. Maybe approximately 20 minutes, 8 approximately. 9 Q. Okay. And your second meeting 10 with Mr. Harrison, how long was that? 11 MS. MESSICK: Object to the form. 12 THE WITNESS: Close to an hour. 13 Q. (By Ms. Sadasivan) And you said 14 you went over deposition basics -- 15 A. (Witness nods head.) 16 Q. -- in that last conversation; is 17 that right? 18 A. That's correct. 19 Q. Did you talk about anything else? 20 MS. MESSICK: Objection. 21 Attorney/client privilege and common interest. 22 MR. HARRISON: Same objection. 23 MS. SADASIVAN: Well, Mr. Turner 24 already disclosed the contents of your 25 conversation about, you know, the deposition</p>

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<p style="text-align: right;">Page 17</p> <p>1 preparation. So it's fair to ask whether or 2 not you spoke about anything else. 3 MS. MESSICK: He spoke before I 4 could object and instruct him not to answer. 5 And we're not going to let you ask about 6 further things. 7 MS. SADASIVAN: Well, it's a 8 privilege which can be waived, though, 9 Ms. Messick. And it was waived. 10 MS. MESSICK: It was not waived. 11 We take the position that the -- Mr. Turner is 12 here today as -- because he is a state 13 employee. And he is testifying about the work 14 that he does as a state employee. He is 15 automatically represented by Mr. Harrison, 16 whether he realizes it or not. Mr. Harrison, 17 like I am, is an attorney -- assistant 18 attorney general. The attorney general 19 controls litigation, including the privilege. 20 A State employee does not get to decide 21 whether the State's secrets are revealed. So 22 I'm going to instruct him not to answer. 23 MR. HARRISON: And my 24 conversations and discussions with Mr. Turner 25 are attorney/client privilege.</p>	<p style="text-align: right;">Page 19</p> <p>1 has the attorney/client privilege been waived. 2 MS. SADASIVAN: So I'll move on to 3 my next question. Thank you. 4 Q. Let's see. Did you receive any 5 documents from Mr. Harrison or Ms. Messick? 6 A. No, I did not. 7 Q. Okay. Did you have any other 8 communications with counsel in this case that 9 you are aware of besides those that we 10 discussed? 11 A. No, I did not. 12 Q. Did you review any other documents 13 in advance of today's deposition? 14 A. No, I did not. 15 MS. MESSICK: Object to the form. 16 Q. (By Ms. Sadasivan) Did you bring 17 any documents with you to today's deposition. 18 A. No, I did not. 19 Q. Other than the people we've 20 already discussed, have you spoken with anyone 21 else about today's deposition? 22 A. No, I have not. 23 Q. Okay. And have you spoken with 24 anyone generally about this case? 25 MS. MESSICK: Object to the form.</p>
<p style="text-align: right;">Page 18</p> <p>1 MS. SADASIVAN: I'm just going to 2 respond since you-all took the time to 3 respond. Attorney/client privilege is a 4 privilege that can be waived. And it is 5 waived when the confidentiality purpose behind 6 the purpose is disclosed to third parties. 7 And a third party is somebody, who like me, in 8 a deposition asks a question and receives an 9 answer in response, which breaks the 10 confidentiality of the attorney/client 11 privilege. Nevertheless, I'm not going to 12 pursue -- 13 MR. HARRISON: Yeah. In no, way, 14 shape or -- 15 MS. SADASIVAN: Please don't -- 16 MR. HARRISON: Yeah, go ahead. 17 MS. SADASIVAN: Please don't 18 please cut me off. Nevertheless, despite the 19 fact that this privilege was waived, and it's 20 clear that it was waived, like a testimonial 21 privilege can be waived, I will move on from 22 those questions and not ask anything -- 23 MR. HARRISON: Okay. But I have 24 to respond to what you just said. In no way, 25 shape, or form -- in no way, shape, or form</p>	<p style="text-align: right;">Page 20</p> <p>1 THE WITNESS: No, I have not. 2 Q. (By Ms. Sadasivan) So I have some 3 questions about your background, Mr. Turner. 4 A. (Witness nods head.) 5 Q. Where did you grow up? 6 A. I grew up in Prichard, Alabama. 7 Q. In Prichard, okay. And where did 8 you go to high school? 9 A. John Shaw High School in Mobile, 10 Alabama. 11 Q. Okay. And is that a public high 12 school? 13 A. Yes, it is. 14 Q. And what year did you graduate 15 from high school? 16 A. 1985. 17 Q. And where did your parents grow 18 up? 19 A. My mom grew up in Thomasville, 20 Alabama, and my dad grew up in Coffeeville, 21 Alabama. 22 Q. So lifelong Alabama residents? 23 A. Oh, yes. 24 Q. Do you know if you attended a 25 segregated high school? Or actually did you</p>

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<p style="text-align: right;">Page 21</p> <p>1 know if you attended any public school that 2 was segregated in Alabama? 3 MS. MESSICK: Object to the form. 4 THE WITNESS: I did not. 5 Q. (By Ms. Sadasivan) Do you know 6 whether your parents attended a segregated 7 high school or actually take -- do you know 8 whether your parents attended a segregated 9 school in Alabama? 10 A. Do I know directly, no. 11 Q. Do you think your parents attended 12 a segregated school in Alabama? 13 A. I -- if it was -- do I think, if 14 that's the question you're asking me, I would 15 say yes. 16 Q. Okay. And how do you feel about 17 that? 18 A. It is my first time being 19 confronted with that question. So I don't -- 20 I don't have a real feeling about it. I just 21 know that's how it was because my parents 22 grew up, you know, in the '30s and '40s. 23 Q. And do you know whether or not you 24 grew up around segregated schools in Prichard? 25 MS. MESSICK: Object to the form.</p>	<p style="text-align: right;">Page 23</p> <p>1 Tuskegee, Alabama. 2 Q. Okay. And what year did you 3 graduate from Tuskegee? 4 A. 1992. 5 Q. And after you graduated from 6 Tuskegee, did you begin work? 7 A. Yes, I went to work. 8 Q. And where did you work? 9 A. I went to work for a company 10 called United Workers Compensation 11 Association. 12 Q. And what position did you hold at 13 United Workers Compensation? 14 A. I was a workers' comp 15 administrator. 16 Q. What did that entail? 17 A. Basically what my job was, I 18 negotiated the fee structure between private 19 industry and doctor's facilities. So, for 20 example, if you have a store, a grocery store 21 with employees, and one of those employees 22 gets injured, we contracted with a medical 23 facility to treat those injuries. And it was 24 my job to negotiate the fee schedule that was 25 between the company and the medical facility.</p>
<p style="text-align: right;">Page 22</p> <p>1 THE WITNESS: During the time that 2 I came up, no, because I came up after 3 desegregation. 4 Q. (By Ms. Sadasivan) Did you receive 5 any higher level or degree after you graduated 6 from John Shaw? 7 A. Yes, I did. 8 Q. And what was that? 9 A. I have a bachelors in management 10 from Tuskegee University. 11 Q. Okay. Did you join any clubs or 12 student groups at Tuskegee? 13 A. I was in SGA. 14 Q. And that's student government? 15 A. Student Government Association. 16 Q. Okay. Anything else? 17 A. Yes. I joined the Masonic Lodge 18 when I was high school -- in college, I'm 19 sorry. 20 Q. Okay. And you said you received a 21 BS in management? 22 A. Yes, management science. 23 Q. Okay. Management science. 24 And which lodge did you join? 25 A. Civil Trial No. 10 out of</p>	<p style="text-align: right;">Page 24</p> <p>1 Q. Okay. I just -- sorry. To go 2 back to your -- the Masonic lodge you were a 3 member of, is that part of Prince Hall Masons? 4 A. Yes, I'm a Prince Hall Mason. 5 Q. Okay. So how long were you at 6 United Workers Compensation? 7 A. Almost four years. 8 Q. So would that be until '96, 1996? 9 A. Let's do three -- I'll change 10 that to three years because I came back to 11 Mobile in '95. 12 Q. And where were you when you were 13 working at United Workers Compensation? 14 A. My corporate office was in 15 Birmingham. 16 Q. And so you came back to Mobile in 17 1995? 18 A. Yes. 19 Q. And what did you do? 20 A. I worked at a furniture company. 21 I was an account manager for a furniture 22 company. 23 Q. Which furniture company? 24 A. Rent-A-Center. 25 Q. Rent-A-Center. Okay.</p>

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<p style="text-align: right;">Page 25</p> <p>1 And how long were you an account 2 manager at Rent-A-Center? 3 A. Right at a year. 4 Q. And so that would have been until 5 '96? 6 A. Yes. 7 Q. In 1996? 8 A. Yes. 9 Q. Okay. What part of Mobile were 10 you living in? 11 A. Well, actually I at my parent's 12 house back in Prichard. 13 Q. In Prichard? 14 A. Yes. 15 Q. But you were working in Mobile? 16 A. Yeah, when I worked at the 17 furniture company. 18 Q. How long that was commute? 19 A. Probably 15 minutes. 20 Q. Okay. So you were commuting into 21 Mobile from Prichard? 22 A. No. I was -- actually, I 23 commuted to Daphne when I first started with 24 the company. I started in Daphne. And then 25 they moved me to Mobile. So it was -- I</p>	<p style="text-align: right;">Page 27</p> <p>1 A. No. 2 Q. Okay. So you moved within Daphne? 3 A. Yes. 4 Q. Okay. But have you lived 5 continuously in Daphne, Alabama since '96? 6 A. Yes. 7 Q. Okay. And so you were selling 8 cars. Where were you -- whom were you selling 9 cars for? 10 A. I worked at Chris Myers Auto 11 Mall. 12 Q. Okay. And after -- how long were 13 you at Chris Myers. 14 A. Two and a half years. 15 Q. And when would that be that you -- 16 like around when did you leave? 17 A. Around March of '98. 18 Q. And what did you do after you 19 left -- 20 A. I went to McConnell Auto Mall. 21 It's another car dealership. I left and went 22 to another car dealership. 23 MS. MESSICK: Would you please let 24 her finish asking her -- 25 THE WITNESS: Oh, I'm sorry.</p>
<p style="text-align: right;">Page 26</p> <p>1 started in Daphne and worked in Mobile. It 2 was a few months later. 3 Q. Okay. And how -- I'm sorry. This 4 is kind of a basic question. How do you 5 identify? What is the race or ethnicity that 6 you identify as? 7 A. Oh, I'm black. 8 Q. Okay. Let's see. 9 After -- so in 1996, around, you 10 left then the account -- your account services 11 at Rent-A-Center, and what did you do? 12 A. I sold cars. 13 Q. Okay. And were you still living 14 in Prichard? 15 A. No. By then, I was married, and 16 I moved to Daphne. 17 Q. Okay. So when did you move to 18 Daphne from Prichard? 19 A. June 12th, 1996. 20 Q. I love that you remember the date 21 exactly. 22 A. That's when I got married. 23 Q. Let's see. 24 Is that the address that you 25 currently reside at?</p>	<p style="text-align: right;">Page 28</p> <p>1 MS. MESSICK: -- question before 2 you answer? 3 THE WITNESS: Yeah. I'm sorry. 4 Q. (By Ms. Sadasivan) Sorry. We're 5 having a conversation talking about your life, 6 so it's easy to understand what I'm going to 7 say and get there. 8 MS. SADASIVAN: But, yeah, thank 9 you, Misty. 10 Q. Okay. So after you left Chris 11 Myers, you went to McConnell? 12 A. Yes. 13 Q. How long were you selling cars 14 with McConnell? 15 A. Approximately eight months. 16 Q. Okay. During that time, you were 17 still living in Daphne, Alabama? 18 A. Yes. 19 Q. Okay. And after McConnell, where 20 did you go? 21 A. I went to work for the State of 22 Alabama. 23 Q. Okay. And how did you become -- 24 how did you get the job working for the State 25 of Alabama?</p>

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<p style="text-align: right;">Page 29</p> <p>1 A. The process is to take a state 2 test. So I filled out an application, 3 submitted to personnel, and took a state 4 test. Then you get called and interviewed by 5 the department that you tested for. 6 Q. What made you interested in 7 working for the State of Alabama? 8 A. It was a suggestion of my wife 9 at the time because she worked for the 10 county. And the car industry was so up and 11 down at that time. She felt like it would be 12 more stable to go work for the State. And 13 she felt like, with my degree, I would be 14 utilizing my degree better instead of just 15 being in sales. 16 Q. And you say your wife worked for 17 county. Is that Baldwin County? 18 A. She started in Mobile, County 19 and ended up working for Baldwin County. 20 Q. Do you know how long she worked 21 Mobile County? 22 A. Approximately five years. 23 Q. And how long has she worked for 24 the county government in Baldwin? 25 A. She -- he job transitioned from</p>	<p style="text-align: right;">Page 31</p> <p>1 utilize my skills. And it just happened that 2 the Department of Industrial Relations was 3 the department that I got the first 4 opportunity with. 5 Q. Okay. So let's talk about that 6 first. So the first position that you held 7 within the State of Alabama was what? 8 A. I was an employment security 9 representative with the Department of 10 Industrial Relations. 11 Q. And what were your -- where was 12 that located at? 13 A. It was in Mobile, Alabama. 14 Q. And what were your 15 responsibilities? 16 A. My job was to assist job seekers 17 with job searching, to assist employers in 18 matching qualified applicants to positions 19 that they had available. And within that 20 first year, I was also charged with the 21 responsibility of doing public outreach for 22 the office. 23 Q. And what kind of public outreach 24 did you do? 25 A. I would partner with faith-based</p>
<p style="text-align: right;">Page 30</p> <p>1 being a county position to a state position. 2 So total it was 17 years. 3 Q. So that's 12 in Baldwin then? 4 A. Yes. 5 Q. With Mobile being the first when 6 it was a county position? 7 A. Yes. 8 Q. Okay. And so you took the state 9 test to work for the State of Alabama; is that 10 right? 11 A. That's correct. 12 Q. And did you have an idea of where 13 within the State of Alabama you wanted to 14 work? 15 A. Are you talking about location 16 wise, or are you talking about department 17 wise? 18 Q. Either. 19 A. It would have been my preference 20 to work in Mobile. That's what I put down on 21 my preference on the sheet, the application 22 that I completed, was that I would prefer to 23 work in Mobile. And to be honest, I didn't 24 have a target department. I just wanted to 25 work for a department that I could best</p>	<p style="text-align: right;">Page 32</p> <p>1 organizations. I would partner with 2 educational facilities. I would partner with 3 community programs to assist them in helping 4 their clients that needed help finding work 5 or finding careers. So it was my job to 6 represent the Department of Industrial 7 Relations in the community. 8 Q. Okay. And faith-based 9 organizations, can you describe some 10 faith-based organizations that you worked 11 with? 12 A. Yes. I worked with an 13 organization called Mobile Interfaith 14 Organization. And -- I'm sorry. Mobile 15 Interfaith Ministries. And it was a group of 16 churches that had come together to form a 17 body. And their job was to go back and 18 assist those in the community that, you know, 19 needed any kind of help or support. 20 Q. And do you know what the 21 demographic makeup is of the membership of the 22 Mobile Interfaith Ministries? 23 MS. MESSICK: Object to the form. 24 THE WITNESS: I would say it's 25 approximately 70/30 black to white.</p>

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<p style="text-align: right;">Page 33</p> <p>1 Q. (By Ms. Sadasivan) Okay. With 70 2 percent of the membership being black and 3 about 30 percent being white? 4 A. Correct. 5 Q. Is that right? 6 A. Correct. 7 Q. Okay. And the community programs 8 that you worked with, can you describe some? 9 A. I worked with a facility that 10 housed abused women. I worked with a 11 facility that did truck -- drug treatment. I 12 worked with an organization that their goal 13 was to assist returning citizens and decrease 14 recidivism. I worked with organizations that 15 were -- the Society for Advancement of Human 16 Resource Managers. So I worked with 17 organizations that also was on the hiring 18 side, not just those that were seeking work, 19 but those that were looking to hire. So I've 20 worked both sides in my career. 21 Q. Okay. 22 A. And, of course, the chamber of 23 commerce, which is a large partner of ours. 24 Q. Yeah. Okay. So in this position 25 for employment representative, you're talking</p>	<p style="text-align: right;">Page 35</p> <p>1 established in prior career as well as 2 working with industry that was already 3 partnered with the department. 4 Q. And in terms of identifying groups 5 that might need employment services in 6 particular, did you have an idea of who those 7 groups might be in Alabama? 8 MS. MESSICK: Object to the form. 9 THE WITNESS: My answer to that 10 question would be, very minimal at first. 11 Coming from where I'm from and growing up 12 in -- like my church, for example, they fed 13 the community. So I knew that there were 14 churches that did the same thing. So that was 15 kind of a baseline for me to start 16 relationships. 17 Q. (By Ms. Sadasivan) And what church 18 do you go to? 19 A. At that time, I was attending 20 Whitestone Baptist Church. 21 Q. And what was the -- do you know 22 the demographic membership of Whitestone 23 Baptist Church at that time? 24 A. 99 percent black. 25 Q. Okay. And so is that kind of</p>
<p style="text-align: right;">Page 34</p> <p>1 about the ways in which you engage with the 2 community on behalf of the Department of 3 Industrial Relations. And we talked about 4 some faith-based and community organizations 5 that you were reaching out to; is that right? 6 A. That's correct. 7 Q. And -- how were you determining 8 who to reach out to on behalf of the 9 Department of Industrial Relations? 10 A. The best way to answer that 11 question is, in my prior career, I was 12 responsible for doing outreach in order for 13 profit -- for a for profit business. So I 14 traveled amongst, you know, the Chamber of 15 Commerce and businesses. And so I already 16 had a relationship with the community prior 17 to going to work for the state. So a lot of 18 those relationships, I just transferred over 19 to my state duties. But also the state -- 20 the department that I worked for had 21 relationships, but they just weren't utilized 22 the way that I -- I kind of made my own path 23 to establishing some of those relationships. 24 And so it was a combination of my own 25 private -- my own contacts that I've</p>	<p style="text-align: right;">Page 36</p> <p>1 common in your experience, that churches with 2 a large black membership provided these 3 employment services? 4 MS. MESSICK: Object to the form. 5 Q. (By Ms. Sadasivan) Or rather 6 not -- needed additional employment services? 7 MS. MESSICK: Object to the form. 8 THE WITNESS: Could you ask the 9 question again so I can be sure because I kind 10 of got lost. 11 Q. (By Ms. Sadasivan) Of course. 12 Sorry. I messed it up a little. 13 Is it your experience that the 14 membership of black churches in particular 15 benefitted from employment assistance? 16 MS. MESSICK: Object to the form. 17 THE WITNESS: I would say they 18 needed -- need our services, even if, you 19 know, they didn't know that it would end up 20 being part of what they do. 21 Q. (By Ms. Sadasivan) Understood. 22 And when you say needed, what do 23 you mean by needed? 24 A. Part of the outreach for the 25 churches that -- because I grew up, you know,</p>

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1 in a religious family, employment was very
2 important -- an important part of what needed
3 to be done. And because I had access to
4 that, I felt that it was my duty to carry it
5 and make it part of the outreach that those
6 organizations did. I felt it was just a good
7 component to add.

8 Q. In your experience in Alabama, are
9 black people more in need of employment
10 services than other people in Alabama?

11 MS. MESSICK: Object to the form.

12 THE WITNESS: I wouldn't say more.
13 I would say they need, but I wouldn't say more
14 than any other. Based on my experience, I
15 wouldn't say more than. But I say they
16 definitely do need it.

17 Q. (By Ms. Sadasivan) And why
18 wouldn't you say more than?

19 A. With my experience now, I know
20 that it is equally needed in all communities.
21 But a lot of the emphasis is directed towards
22 black communities.

23 Q. Okay. And in your experience, are
24 black people more likely to be unemployed than
25 white people?

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1 MS. MESSICK: Object to the form.

2 THE WITNESS: That -- if you're
3 going to use a percentage number, I would say
4 yes.

5 Q. (By Ms. Sadasivan) Right.
6 So how long were you an employment
7 security representative?

8 A. 12 years.

9 Q. Okay. And what did you do next?

10 A. I moved into the title of
11 manager.

12 Q. So you became a manager of the
13 Department of Industrial Relations?

14 A. Yeah. At that time, the name
15 was changed from the Department of Industrial
16 Relations to Alabama Department of Labor.

17 Q. All right. So you became a
18 manager in around 2012; is that right?

19 A. That's correct.

20 Q. Okay. And what did your
21 management responsibilities -- or what did
22 your responsibilities entail in that new
23 position?

24 A. In my new position, my
25 responsibilities were to train staff, hire

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1 staff, provide progressive discipline to
2 staff. But in that position, I was able to
3 do even more outreach and even more, I guess
4 for the better word, marketing of services.

5 Q. Okay. And what was that
6 additional outreach that you were able to do?

7 A. Well, it was more of a time. I
8 had more time to dedicate to getting out of
9 the office instead of having to be in the
10 office and wait on clients. So I was really
11 able to get out and market the career center
12 and the evolution of the career center from a
13 job base perception to a career-base
14 perception.

15 Q. So we haven't talked about career
16 center. Would you mind just explaining
17 quickly what you mean by a career center and
18 moving it from a job-based perception to a
19 career-based perception?

20 MS. MESSICK: Object to the form.

21 Q. (By Ms. Sadasivan) We can take
22 those one at a time. So can you tell me what
23 a career center is?

24 A. Yes. A career center, there was
25 legislation that came down under the

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1 Workforce Investment Act that required that,
2 formally State Employment Services were
3 evolved into what's called Comprehensive
4 Career Centers. And what that was was a
5 partnership between Education, Vocational
6 Rehabilitation, Adult Education, and
7 Employment Services. So all four of those
8 bodies were brought under one roof in order
9 to provide seamless service whereas you
10 didn't have clients having to go from place
11 to place to place to receive services. So it
12 kind of brought it all under one umbrella.
13 And that's what it's called a Career Center
14 instead of just the Employment Service.

15 Q. Okay. And when did that happen?

16 When did the act kind of require the kind of
17 unification of those services?

18 A. The legislation came out 2002 or
19 2003. Between 2002 and 2003.

20 Q. Okay. So by the time you became a
21 manager in the Department of Labor, the career
22 centers was already established?

23 A. Yes.

24 Q. Okay. And how many career centers
25 were there in 2012 when you became a manager?

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<p style="text-align: right;">Page 41</p> <p>1 A. Over the state?</p> <p>2 Q. (Nodding head.)</p> <p>3 MS. MESSICK: Let the record</p> <p>4 reflect that --</p> <p>5 Q. Yes.</p> <p>6 MS. MESSICK: -- she said yes.</p> <p>7 THE WITNESS: Okay.</p> <p>8 MS. MESSICK: And nodded.</p> <p>9 THE WITNESS: In my estimation, 45</p> <p>10 at that time.</p> <p>11 Q. (By Ms. Sadasivan) Okay. All</p> <p>12 right. We can come back to that.</p> <p>13 It seems like -- do you know how</p> <p>14 many there are now -- career center there are</p> <p>15 now?</p> <p>16 A. Now, the reason that -- I would</p> <p>17 have to answer that question this way. There</p> <p>18 are 47 comprehensive centers, which is what I</p> <p>19 described to you. But there are also</p> <p>20 itinerant sites now that are located in other</p> <p>21 facilities. Like on the campus of a two-year</p> <p>22 college, there's a site where people can come</p> <p>23 and get career center services. I think the</p> <p>24 number is 57 in the state total now.</p> <p>25 Q. Okay. So at the time when you</p>	<p style="text-align: right;">Page 43</p> <p>1 tended to have one perception based upon</p> <p>2 years prior. And so I was charged with</p> <p>3 getting out and helping evolve that</p> <p>4 perception.</p> <p>5 Q. Okay. And what were the</p> <p>6 additional -- what were the changes that were</p> <p>7 being rolled out at the career centers that</p> <p>8 you're describing?</p> <p>9 A. The major change was we have --</p> <p>10 we had access to career training</p> <p>11 opportunities that were Federally funded.</p> <p>12 And that would have put clients who were</p> <p>13 locked into one specific type of industry,</p> <p>14 able to gain access to training so that they</p> <p>15 could transition upward into better</p> <p>16 positions.</p> <p>17 Q. So the additional services that</p> <p>18 were being provided at career centers were a</p> <p>19 result of Federal funding for those services?</p> <p>20 A. Correct.</p> <p>21 Q. Okay. And do you know whether any</p> <p>22 state funds were allocated for those</p> <p>23 additional services?</p> <p>24 A. It was matched.</p> <p>25 Q. It was matched by the state?</p>
<p style="text-align: right;">Page 42</p> <p>1 began working as a manager, and you said there</p> <p>2 were 45 comprehensive career centers, were</p> <p>3 there any itinerant sites at that time?</p> <p>4 A. Yes. I would include itinerants</p> <p>5 in that count.</p> <p>6 Q. Okay. All right.</p> <p>7 And so in terms of the additional</p> <p>8 outreach and marketing that you were able to</p> <p>9 do as a manager, why was it important to you,</p> <p>10 or why was marketing important to the career</p> <p>11 centers? I guess let me rephrase that. Why</p> <p>12 was it important to undertake additional</p> <p>13 marketing?</p> <p>14 A. The most important reason for me</p> <p>15 to get out and market the career center is we</p> <p>16 were under a major change in the types of</p> <p>17 services that we provided. And the public</p> <p>18 had to be made aware of what we were doing</p> <p>19 and how it could benefit the public.</p> <p>20 So part of my job was to get out</p> <p>21 and share the good news of how career centers</p> <p>22 had evolved and that they play a major role</p> <p>23 in the success of what we were trying to do.</p> <p>24 So it was my job to get out and</p> <p>25 make the public aware because the public</p>	<p style="text-align: right;">Page 44</p> <p>1 A. (Witness nods head.)</p> <p>2 Q. Okay. And so the additional --</p> <p>3 the additional service that was provided as a</p> <p>4 result of this Federal funding was to allow</p> <p>5 people to switch industries?</p> <p>6 MS. MESSICK: Object to the form.</p> <p>7 Q. (By Ms. Sadasivan) To give career</p> <p>8 seekers more opportunities to switch</p> <p>9 industries, is that the service that you were</p> <p>10 additionally providing?</p> <p>11 MS. MESSICK: Object to the form.</p> <p>12 Q. (By Ms. Sadasivan) You can answer.</p> <p>13 A. Yes.</p> <p>14 Q. Was there any other additional</p> <p>15 service that you provided?</p> <p>16 A. We provided adult education for</p> <p>17 GED. We provided access to vocational</p> <p>18 rehabilitation. We also had a -- have a unit</p> <p>19 that is dedicated to veteran's services,</p> <p>20 veteran employment service.</p> <p>21 Q. Okay. And are you still a manager</p> <p>22 then of the Department of Labor career centers</p> <p>23 in the same role?</p> <p>24 A. Are you talking currently?</p> <p>25 Q. Currently, yeah.</p>

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<p style="text-align: right;">Page 45</p> <p>1 A. Currently, I'm a senior manager.</p> <p>2 Q. A senior manager.</p> <p>3 Okay. And when did you become a</p> <p>4 senior manager?</p> <p>5 A. 11 years ago.</p> <p>6 Q. Oh, congratulations.</p> <p>7 And what additional, if any,</p> <p>8 responsibilities did you undertake as a senior</p> <p>9 manager?</p> <p>10 MS. MESSICK: Object to the form.</p> <p>11 Q. (By Ms. Sadasivan) You can answer.</p> <p>12 A. My role as a senior manager, I'm</p> <p>13 responsible for the site, not just my unit</p> <p>14 management. I'm over the entire facility as</p> <p>15 it relates to the physical facility. So as</p> <p>16 far as safety, as far as distribution of</p> <p>17 costs allocation, as far as reports that are</p> <p>18 required to, you know, our functioning, that</p> <p>19 is added to my responsibilities now.</p> <p>20 Q. And I should go back quickly.</p> <p>21 As a career center manager before</p> <p>22 you became a senior manager, were you</p> <p>23 affiliated with a specific career center?</p> <p>24 A. Yes.</p> <p>25 Q. Which one?</p>	<p style="text-align: right;">Page 47</p> <p>1 Alabama Career Center. I've worked at the</p> <p>2 Jackson, Alabama Career Center. I think</p> <p>3 those are the only ones that I've actually</p> <p>4 worked. It was very short-term assignments.</p> <p>5 I'd just go in to help when there was an</p> <p>6 issue. And I did some training at another</p> <p>7 career center, Greenville, Alabama. I did</p> <p>8 training at the Greenville, Alabama Career</p> <p>9 Center.</p> <p>10 Q. Let's walk through these. The</p> <p>11 Selma Career Center, when were you working at</p> <p>12 the Selma Career Center?</p> <p>13 A. 2008, I believe I worked at the</p> <p>14 Selma Career Center. And I was there because</p> <p>15 they had a lack of staff and they needed some</p> <p>16 support. So they asked me would I go up and</p> <p>17 help at that career center.</p> <p>18 Q. Okay. So were you still living in</p> <p>19 Daphne, Alabama?</p> <p>20 A. Yes, I was.</p> <p>21 Q. And you were commuting?</p> <p>22 A. No. No, I didn't commute. I</p> <p>23 stayed at a hotel.</p> <p>24 Q. You stayed at a hotel in Selma?</p> <p>25 A. Yes.</p>
<p style="text-align: right;">Page 46</p> <p>1 A. Mobile Career Center.</p> <p>2 Q. Okay. And did you work at any</p> <p>3 other career center?</p> <p>4 A. No, I've always worked for the</p> <p>5 Mobile Career Center.</p> <p>6 Q. So do you have any experience with</p> <p>7 the operations of any other career center?</p> <p>8 MS. MESSICK: Object to the form.</p> <p>9 Q. (By Ms. Sadasivan) You can answer.</p> <p>10 A. Yes. Are you asking me have I</p> <p>11 worked in other offices ever?</p> <p>12 Q. Yes.</p> <p>13 A. Is that kind of the question</p> <p>14 you're asking me?</p> <p>15 Q. Yes.</p> <p>16 A. Yes, I have.</p> <p>17 Q. So what experience do you have in</p> <p>18 other career centers?</p> <p>19 A. I've worked at the Selma Career</p> <p>20 Center.</p> <p>21 Q. Okay.</p> <p>22 A. I've worked at the Bay Minette</p> <p>23 Career Center.</p> <p>24 Q. Okay.</p> <p>25 A. And I have worked at the Foley,</p>	<p style="text-align: right;">Page 48</p> <p>1 Q. Okay. And you were still employed</p> <p>2 by the career center in Mobile, just providing</p> <p>3 support to the career center in Selma?</p> <p>4 A. Well, I'm a state employee. So,</p> <p>5 I mean, I work for the state. So it's...</p> <p>6 Q. Okay.</p> <p>7 A. Yeah. But, yes, my base was</p> <p>8 still in Mobile.</p> <p>9 Q. Okay. And then the Bay Minette</p> <p>10 Career Center, how long were you providing</p> <p>11 support there?</p> <p>12 A. I just went over there for a</p> <p>13 week.</p> <p>14 Q. Okay.</p> <p>15 A. Yeah.</p> <p>16 Q. And what -- why were you providing</p> <p>17 support there?</p> <p>18 A. Again, it was a staffing issue.</p> <p>19 Q. And the Foley Career Center?</p> <p>20 A. I went to the Foley Career</p> <p>21 Center as a special project. They were doing</p> <p>22 heavy recruiting because there was an issue</p> <p>23 getting people to apply for jobs. So we went</p> <p>24 down to kind of do a mass recruiting project.</p> <p>25 Q. And when were you working with the</p>

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<p style="text-align: right;">Page 49</p> <p>1 Foley Career Center?</p> <p>2 A. That was approximately ten years</p> <p>3 ago. This -- so 2014.</p> <p>4 Q. 2014?</p> <p>5 A. Yeah.</p> <p>6 Q. When you say they were having</p> <p>7 trouble getting people to apply, what do you</p> <p>8 mean?</p> <p>9 A. It's a beach town. And a lot of</p> <p>10 the kids, you know, just weren't interested</p> <p>11 in working in the hotel industry or the</p> <p>12 restaurant industry. So they were having</p> <p>13 trouble, you know, just getting hotel</p> <p>14 positions and restaurant positions filled.</p> <p>15 So they needed help to attract more people to</p> <p>16 come and take those jobs.</p> <p>17 Q. And then in Jackson, the Jackson</p> <p>18 Career Center, when were you working there?</p> <p>19 A. When I -- I went there for</p> <p>20 multiple days. It's -- maybe 12 years ago.</p> <p>21 Q. Okay.</p> <p>22 A. Yeah, it just kind -- you know,</p> <p>23 these aren't in order. I didn't give them to</p> <p>24 you in order. I just kind of gave them to</p> <p>25 you as I thought about.</p>	<p style="text-align: right;">Page 51</p> <p>1 that I spent in an office. So I was, you</p> <p>2 know, just being there and having access to</p> <p>3 the clients that were coming in and out of the</p> <p>4 office would allow me to be able to describe</p> <p>5 it.</p> <p>6 Q. (By Ms. Sadasivan) And that was</p> <p>7 limited to 2008; is that right?</p> <p>8 A. Correct.</p> <p>9 Q. So your understanding of the</p> <p>10 people seeking services at the Selma Career</p> <p>11 Center is limited to 2008?</p> <p>12 A. Yes.</p> <p>13 Q. And do you know what -- if there</p> <p>14 was a predominant race of individuals who were</p> <p>15 seeking services from the Selma Career Center</p> <p>16 when you were there?</p> <p>17 MS. MESSICK: Object to the form.</p> <p>18 THE WITNESS: During the time that</p> <p>19 I worked there, the makeup -- I would put it</p> <p>20 close to 50/50, you know.</p> <p>21 Q. (By Ms. Sadasivan) 50/50 what?</p> <p>22 A. Black and white, 50 percent</p> <p>23 black, 50 percent white. It was a very</p> <p>24 balanced clientele that came.</p> <p>25 Q. (By Ms. Sadasivan) And were you</p>
<p style="text-align: right;">Page 50</p> <p>1 Q. Yeah. Of course, it's fine. I'm</p> <p>2 just interested in why you were there.</p> <p>3 A. Training.</p> <p>4 Q. Why, for example, would you go to</p> <p>5 the Jackson center --</p> <p>6 A. We actually went there to learn</p> <p>7 a new software that was being used throughout</p> <p>8 the department. And so it was a place where</p> <p>9 us managers could come and all work together</p> <p>10 to learn a new software.</p> <p>11 Q. Would you say that in any of these</p> <p>12 other career centers you are familiar with the</p> <p>13 people seeking services at those centers?</p> <p>14 MS. MESSICK: Object to the form.</p> <p>15 THE WITNESS: Yes, I would say</p> <p>16 familiar. You know, I wouldn't want to do a</p> <p>17 statistics on it. But I could, you know, give</p> <p>18 a fair assessment of the populations.</p> <p>19 Q. (By Ms. Sadasivan) So let's talk</p> <p>20 through these then one by one. How are you</p> <p>21 familiar with types of individuals seeking</p> <p>22 assistance from the Selma Career Center?</p> <p>23 MS. MESSICK: Object to the form.</p> <p>24 THE WITNESS: The time that I</p> <p>25 spent at Selma, it was the longest duration</p>	<p style="text-align: right;">Page 52</p> <p>1 actually providing those career center</p> <p>2 services to individuals coming to the office</p> <p>3 in 2008?</p> <p>4 A. Yes, I worked in that office.</p> <p>5 Q. Okay. And then the Bay Minette</p> <p>6 Career Center, you said you were about a week</p> <p>7 there; is that right?</p> <p>8 A. Yes.</p> <p>9 Q. And how are you familiar with the</p> <p>10 individuals seeking employment or career</p> <p>11 center services at the Bay Minette office?</p> <p>12 THE WITNESS: I live in Baldwin</p> <p>13 County. And with Bay Minette being in Baldwin</p> <p>14 County, I'm just naturally familiar with the</p> <p>15 Bay Minette area because I have -- frequent</p> <p>16 back and forth in that area.</p> <p>17 Q. Okay. And where does your</p> <p>18 personal knowledge of the individuals or the</p> <p>19 types of individuals who are seeking career</p> <p>20 center services from the Bay Minette center,</p> <p>21 where does that come from?</p> <p>22 MS. MESSICK: Object to the form.</p> <p>23 THE WITNESS: Yeah. Can you kind</p> <p>24 of explain that question to me a little bit?</p> <p>25 Q. (By Ms. Sadasivan) So you said</p>

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1 you're familiar with the demographics of
2 people seeking services in the five offices
3 that you listed as working there; is that
4 right?

5 MS. MESSICK: Object to the form.

6 Q. (By Ms. Sadasivan) Is that right?

7 A. Yes.

8 Q. Okay. And I'm asking you then
9 how -- you testified earlier as well that you
10 spent about a week working directly in the Bay
11 Minette Career Center; is that right?

12 A. That's correct.

13 Q. And besides your general sense
14 from living in Baldwin County, I'm trying to
15 understand where your personal knowledge about
16 the demographics of individuals seeking
17 services from the Bay Minette Career Center,
18 where that comes from besides the week that
19 week that you spent working there.

20 MS. MESSICK: Object to the form.

21 THE WITNESS: We worked closely
22 with the Bay Minette Career Center out of --
23 you know, between -- Mobile and Bay Minette
24 clients kind of go back and forth. So we
25 served some of the similar clientele as Bay

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1 Minette -- common clientele between the Mobile
2 Career Center and the Bay Minette Career
3 Center.

4 Q. Okay. But you would agree with me
5 that that wouldn't give you an ability to
6 understand the demographics of everyone served
7 at the Bay Minette office; is that right?

8 A. Oh, I agree to that statement,
9 yes.

10 Q. Okay. Right.

11 But you do have some shared
12 clientele, is what you're saying?

13 A. Yes, that's what I said.

14 Q. Okay. All right.

15 So in Foley, Alabama, that was
16 another special project in 2014. You said you
17 had information or knowledge about the
18 demographics of individuals seeking services
19 from that career center; is that right?

20 MS. MESSICK: Object to the form.

21 THE WITNESS: I would say that
22 it's the same as with Bay Minette because of
23 the years of relationship and clients being in
24 common. It's the same. It would be the same
25 answer.

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1 Q. (By Ms. Sadasivan) But, again, you
2 would agree with me that you don't have
3 personal knowledge about the overall
4 demographics of individuals served by the
5 Foley Alabama Career Center office?

6 A. I would agree to that.

7 Q. Okay. And then the Jackson Career
8 Center, the same question, but -- from where
9 does your personal knowledge about the
10 clientele or the demographics of the clientele
11 being served at that office come from?

12 MS. MESSICK: Object to the form.

13 THE WITNESS: Now, with the
14 Jackson office, the manager that managed the
15 Jackson office and I were along the same time
16 line as far as our experience. So that one is
17 more of a managerial conversation, talking
18 about issues that we have in the two offices.
19 So more than working directly with the
20 clientele, that knowledge would come from the
21 relationship between the manager and myself.

22 Q. And so you and the manager of the
23 Jackson office speak about the demographics of
24 the clientele that is served there?

25 A. We have.

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1 Q. How many times?

2 A. In a 25-year -- I mean, you
3 know, in a managerial 12- or 13-year career,
4 I wouldn't want to give an estimate or a
5 guess. But it's just a conversation that we
6 have, you know, as managers when needed.
7 It's nothing that we've done on a consistent
8 basis.

9 Q. Okay. And you would agree there
10 too that you don't have personal knowledge of
11 the actual demographics of the clientele being
12 served?

13 A. I would --

14 MS. MESSICK: Object to the form.

15 THE WITNESS: I'm sorry.

16 Q. (By Ms. Sadasivan) You can answer.

17 A. I agree.

18 Q. Okay. And I think we -- you know,
19 talked a little bit about some of your duties
20 as a senior career center manager in terms of
21 the physical, you know, responsibilities for
22 the physical center in Mobile. Are there
23 other responsibilities that you have now as a
24 senior manager that we didn't talk about?

25 MS. MESSICK: Object to the form.

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<p style="text-align: right;">Page 57</p> <p>1 THE WITNESS: I think we've 2 covered all of my responsibilities. Again, 3 becoming a senior manager just required that 4 my -- I no longer directly supervise staff. I 5 have an assistant that handles the staff. 6 Once it's elevated past staff level, then 7 it -- I get involved. 8 And then I'm responsible for all 9 the departments that located in our facility 10 to make sure whatever that whatever they need 11 out of the facility that I make sure those 12 things are taken care of. 13 Q. Understood. 14 Okay. So switching gears just a 15 little bit. Are you on social media? 16 A. Personally? Is that what you're 17 asking? 18 Q. Personally or professionally or in 19 any capacity, or are you on social media? 20 A. Yes. 21 Q. And what capacity? 22 A. Personal and business. 23 Q. Okay. So let's start with your 24 personal. What platforms do you use? 25 A. Facebook, Instagram, TikTok,</p>	<p style="text-align: right;">Page 59</p> <p>1 Q. In terms of any other social media 2 accounts, whether in your personal or 3 professional capacity, any others we haven't 4 discussed? 5 A. No. 6 Q. Are you a member of a political 7 party? 8 A. Yes. 9 Q. Which political party? 10 A. Democrat. 11 Q. Okay. And for how long have you 12 been a democrat? 13 A. I've always been a democrat. So 14 since I was 17 -- 18 when I first registered 15 to vote. 16 Q. And what attracted you to the 17 democratic party? 18 A. Let me clarify. Can we clarify 19 that question? 20 Q. Of course. 21 A. Are you asking me what attracted 22 me at the -- the first time I registered as a 23 democrat, or are you asking me what keeps me? 24 Q. Well, let's talk about both. Why 25 did you initially register or, you know, vote,</p>
<p style="text-align: right;">Page 58</p> <p>1 that's personal. I mean, those are my 2 personals. 3 Q. And what is your username or 4 handle? 5 MS. MESSICK: Object to the form. 6 THE WITNESS: My Facebook username 7 is Tox109, I think. 8 Q. (By Ms. Sadasivan) And Instagram? 9 A. It's Toxy, T-o-x-y, baby -- 10 T-o-x-y-b-a-b-y-78. 11 Q. And TikTok? 12 A. I think it's the same. 13 Q. Okay. And do you have X? 14 A. Do I have a who? 15 Q. Formally called Twitter, now 16 called X. 17 A. Yes. But it's been so long ago, 18 I don't know if it's still active. I stopped 19 using it. 20 Q. Okay. And in your professional 21 capacity, is that -- do you have a 22 professional Facebook, or do you professional 23 social media accounts? 24 A. Yes, I'm on LinkedIn 25 professionally.</p>	<p style="text-align: right;">Page 60</p> <p>1 I guess, as a democrat? 2 A. Initially because my parents 3 were democrats. 4 Q. Okay. And then why have you 5 remained a democrat? 6 A. I -- just personally I feel that 7 the democratic agenda is more in line with my 8 personal beliefs. 9 Q. And which personal beliefs is it 10 more in line with? 11 A. A common good strengthening of 12 the middle class, civil rights. 13 Q. And when you say -- 14 MS. MESSICK: I'm sorry. Were you 15 done? 16 THE WITNESS: Yeah, I am. 17 MS. MESSICK: Okay. 18 Q. (By Ms. Sadasivan) Have you ever 19 run for political office? 20 A. No, I have not. 21 Q. Okay. Have you ever donated to a 22 political campaign? 23 A. Yes, I have. 24 Q. Okay. And who is your congress 25 person?</p>

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<p style="text-align: right;">Page 61</p> <p>1 MS. MESSICK: Object to the form. 2 THE WITNESS: I don't know his 3 name. 4 Q. (By Ms. Sadasivan) Okay. 5 Do you know which congressional 6 district you're in? 7 A. I live in Baldwin County. So 8 I'm not sure of the number. 9 Q. Do you know who your state 10 representative is? 11 A. I do not. 12 Q. Okay. And do you know who your 13 state senator is? 14 A. Can I ask a question? 15 Q. Well, not technically, but you 16 can. 17 A. I understand. I'll answer 18 truthfully then. I know state 19 representatives, but I don't know if state 20 representatives are broken down by county. 21 So I would -- I know that -- you know, we 22 have on the legislative side, I know, you 23 know, some of the legislators. I wouldn't 24 know the ones specifically designated for 25 Baldwin County.</p>	<p style="text-align: right;">Page 63</p> <p>1 Q. So no internet searches about this 2 case? 3 A. No, I did not do any internet 4 searches about this case. 5 Q. Okay. And what is your 6 understanding of this lawsuit? 7 MS. MESSICK: Object to the form. 8 THE WITNESS: My knowledge is that 9 this is addressing an issue about the drawing 10 of districts in the southern part or the -- 11 you know, lower part of the state, the drawing 12 of district lines. 13 Q. (By Ms. Sadasivan) And how did you 14 learn about it? 15 A. Through news media. 16 Q. News media. Okay. 17 And what did you -- what about 18 drawing lines do you understand to be at issue 19 in this case? 20 MS. MESSICK: Object to the form. 21 THE WITNESS: That the government 22 issued a mandate for the district lines to be 23 drawn a certain way and that the state drew 24 lines a certain way and they were trying to 25 come to an agreement for, you know, the proper</p>
<p style="text-align: right;">Page 62</p> <p>1 Q. Okay. And which like state 2 legislators are you familiar with in your 3 area? 4 A. I know we have U.S. Senator 5 Katie Britt. I know that we have State 6 Representative Napoleon Bracy, State 7 Representative Adline Clarke, State 8 Representative Sam Jones, State 9 Representative Barbara Drummond. And all of 10 those are from my part of the state. 11 Q. Okay. And your state senators, do 12 you know them? Do you know who your state 13 senator is, rather? 14 A. Tommy Tuberville, I think. As 15 far as U.S. We're talking about U.S.; right? 16 Q. I was actually meaning State. 17 A. State of Alabama? 18 Q. Alabama State Senator like local. 19 A. Vivian Figures. Yes, I do. I'm 20 sorry. Yes, I do. Vivian Figures. 21 Q. Okay. Great. 22 So let's talk about the deposition 23 today in this case. Did you do independent 24 research about this case? 25 A. No.</p>	<p style="text-align: right;">Page 64</p> <p>1 way to draw those lines. 2 Q. (By Ms. Sadasivan) Okay. 3 And when you say the government 4 said the map should be drawn a certain way, 5 I'll represent to you that the Supreme Court 6 said that the State of Alabama should draw two 7 majority black congressional districts to give 8 black voters in the state an ability to elect 9 candidates of their choice, and that, in 10 response, the State of Alabama, again, drew a 11 map with one single congressional district 12 where black voters could elect a candidate of 13 their choice. Does that accord with your 14 recollection of what you've heard about this 15 case? 16 MS. MESSICK: Object to the form. 17 THE WITNESS: It does. 18 Q. (By Ms. Sadasivan) It does. Okay. 19 Did you participate in the 2021 20 redistricting process? 21 A. I did not. 22 Q. Did you participate in the 2023 23 redistricting process? 24 A. I did not. 25 Q. Okay. Do you have any views about</p>

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<p style="text-align: right;">Page 65</p> <p>1 Alabama's -- an Alabama congressional map that</p> <p>2 draws a single majority black congressional</p> <p>3 district?</p> <p>4 A. Do I have any views? You mean</p> <p>5 how do I feel about it personally, is that</p> <p>6 what you're asking me?</p> <p>7 Q. Yes. How do you feel about it</p> <p>8 personally?</p> <p>9 A. My personal feeling would be I</p> <p>10 feel that the more access to representation</p> <p>11 that's possible should be provided.</p> <p>12 Q. Should be provided to black</p> <p>13 voters; right?</p> <p>14 A. Yes.</p> <p>15 MS. MESSICK: Object to the form.</p> <p>16 THE WITNESS: I'm sorry.</p> <p>17 Q. (By Ms. Sadasivan) Do you believe</p> <p>18 black Alabamians have historically been</p> <p>19 underrepresented in Alabama's congressional</p> <p>20 districts?</p> <p>21 MS. MESSICK: Object to the form.</p> <p>22 THE WITNESS: Traditionally, yes.</p> <p>23 Q. (By Ms. Sadasivan) And what do you</p> <p>24 mean by "traditionally"?</p> <p>25 A. Based upon history -- based upon</p>	<p style="text-align: right;">Page 67</p> <p>1 or we may need to take a break and print it.</p> <p>2 MS. SADASIVAN: It shouldn't be</p> <p>3 anything that needs to be printed. But I just</p> <p>4 dropped the -- what I'm going to ask the court</p> <p>5 reporter to mark as Exhibit 1 into the chat.</p> <p>6 And I'm going to also just share it on my</p> <p>7 screen so that you are able to see it.</p> <p>8 (A short discussion was held.)</p> <p>9 MS. SADASIVAN: Let me share it on</p> <p>10 my screen so the witness can see.</p> <p>11 (Whereupon, Plaintiff's</p> <p>12 Exhibit No. 1 was marked for</p> <p>13 identification.)</p> <p>14 Q. (By Ms. Sadasivan) All right.</p> <p>15 Mr. Turner, are you able to see my</p> <p>16 screen?</p> <p>17 A. Yes.</p> <p>18 MS. MESSICK: Okay. Give us just</p> <p>19 a second. It's really small, and I need a</p> <p>20 second to get it on the big screen.</p> <p>21 MS. SADASIVAN: Okay. Let me just</p> <p>22 identify it.</p> <p>23 Q. Well, while we're waiting for it</p> <p>24 to be put on the big screen, I'm going to</p> <p>25 represent to you that this is a filing that</p>
<p style="text-align: right;">Page 66</p> <p>1 history, I feel that the black population was</p> <p>2 not afforded the same access to</p> <p>3 representation as other races in the state.</p> <p>4 Q. And -- okay.</p> <p>5 Do you believe that black</p> <p>6 Alabamians are currently underrepresented in</p> <p>7 Alabama's congressional districts?</p> <p>8 MS. MESSICK: Object to the form.</p> <p>9 THE WITNESS: Yes.</p> <p>10 MS. SADASIVAN: Okay. I am going</p> <p>11 to share on my screen of what I am going to</p> <p>12 also -- I don't know if I'm able to put these</p> <p>13 in the chat. Maybe, Misty, I can e-mail you</p> <p>14 quickly the exhibit, if that's okay. But I'll</p> <p>15 ask that it be marked as Exhibit 1. I</p> <p>16 apologize. Do you-all know if I'm able to</p> <p>17 drop links into the chat?</p> <p>18 MS. MESSICK: Drop a link or drop</p> <p>19 a file?</p> <p>20 MS. SADASIVAN: A PDF, rather.</p> <p>21 MS. MESSICK: You should be able</p> <p>22 to drag and drop it.</p> <p>23 MS. SADASIVAN: Okay, great.</p> <p>24 MS. MESSICK: And depending on</p> <p>25 what it is, he may be able to just look at it,</p>	<p style="text-align: right;">Page 68</p> <p>1 the State of Alabama submitted in this case</p> <p>2 Milligan versus Allen. And I'm going to</p> <p>3 scroll down to page 4 of this document. Do</p> <p>4 you see your name, Mr. Turner, or is it still</p> <p>5 hard to see?</p> <p>6 A. Yeah, I can see it.</p> <p>7 Q. Okay. And do you see this is --</p> <p>8 I'll represent to you that this is the State</p> <p>9 of Alabama of Alabama disclosing you, Derrick</p> <p>10 Turner, as somebody with information. Would</p> <p>11 you mind just -- relevant information in this</p> <p>12 case. And would you mind just reading where</p> <p>13 it says subject of information here after your</p> <p>14 name?</p> <p>15 A. Yes, I see it.</p> <p>16 Q. Would you just mind reading out</p> <p>17 loud the subject of information that the State</p> <p>18 of Alabama listed you as having?</p> <p>19 A. "Mr. Turner has information</p> <p>20 about the work of the Alabama Department of</p> <p>21 Labor's Mobile Career Center.</p> <p>22 Q. Okay. I'm going to stop sharing</p> <p>23 my screen really quickly. Okay. It should be</p> <p>24 back. So, Mr. Turner, what information do you</p> <p>25 understand that you have with respect to the</p>

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<p style="text-align: right;">Page 69</p> <p>1 Department of Labor's Mobile Career Center?</p> <p>2 MS. MESSICK: Object to the form.</p> <p>3 THE WITNESS: That's kind of a</p> <p>4 really broad question. Can you kind of narrow</p> <p>5 it down a little bit because, I mean, I have</p> <p>6 general knowledge of, you know, most issues as</p> <p>7 it relates to the Mobile Career Center.</p> <p>8 Q. (By Ms. Sadasivan) Okay.</p> <p>9 Why do you think the State of</p> <p>10 Alabama listed you as having relevant</p> <p>11 information in this case given the subject of</p> <p>12 information that you were disclosed as having?</p> <p>13 MS. MESSICK: Object to the form.</p> <p>14 THE WITNESS: As it relates to the</p> <p>15 career center, I mean, I have 25 years'</p> <p>16 experience at the Mobile Career Center. So if</p> <p>17 there was a question that relates to the</p> <p>18 career center as it relates to this case,</p> <p>19 then, you know, chances are more than likely</p> <p>20 that I have information that would be of</p> <p>21 value.</p> <p>22 Q. (By Ms. Sadasivan) And do you</p> <p>23 understand that your testimony at trial in</p> <p>24 this case would relate to the Alabama</p> <p>25 Department of Labor's Mobile Career Center</p>	<p style="text-align: right;">Page 71</p> <p>1 Q. So in your time at the Department</p> <p>2 of Labor, an additional seven centers or</p> <p>3 satellite centers have opened; is that right?</p> <p>4 A. That's correct.</p> <p>5 MS. MESSICK: Object to the form.</p> <p>6 THE WITNESS: I'm sorry.</p> <p>7 Q. (By Ms. Sadasivan) And do you know</p> <p>8 where those centers that opened during your</p> <p>9 tenure are located?</p> <p>10 A. No. That's a state-wide thing.</p> <p>11 So I wouldn't know about offices to the north</p> <p>12 of us.</p> <p>13 Q. Do you know any offices in your</p> <p>14 area that opened during your tenure at the</p> <p>15 Department of Labor?</p> <p>16 MS. MESSICK: Object to the form.</p> <p>17 THE WITNESS: No. Those</p> <p>18 expansive office -- the itinerant sites are in</p> <p>19 other regions. We have -- the centers that</p> <p>20 are in my region have been there since I've</p> <p>21 worked for the state.</p> <p>22 Q. (By Ms. Sadasivan) Okay. Perfect.</p> <p>23 I am going to add quickly another -- let's</p> <p>24 see. I'm going to add another document</p> <p>25 hopefully. I'm dropping into the chat what</p>
<p style="text-align: right;">Page 70</p> <p>1 only?</p> <p>2 MS. MESSICK: Object to the form.</p> <p>3 THE WITNESS: Yes.</p> <p>4 Q. (By Ms. Sadasivan) Okay.</p> <p>5 And do you anticipate testifying</p> <p>6 about any topics in addition to those you just</p> <p>7 read in the document I showed you?</p> <p>8 MS. MESSICK: Object to the form.</p> <p>9 THE WITNESS: I would not.</p> <p>10 Q. (By Ms. Sadasivan) Okay.</p> <p>11 So let's talk about the</p> <p>12 information that you have related to the</p> <p>13 Department of Labor's Mobile Career Center.</p> <p>14 You said there are currently 57</p> <p>15 career centers throughout the state; is that</p> <p>16 right?</p> <p>17 A. That's an approximate number,</p> <p>18 yes.</p> <p>19 Q. Okay. And -- but when you began</p> <p>20 working at the Department of Labor as a</p> <p>21 manager, you said there were around 45; is</p> <p>22 that right?</p> <p>23 A. As a manager, which would have</p> <p>24 been 2011, 2012, I would probably amend that</p> <p>25 to say to say maybe 50.</p>	<p style="text-align: right;">Page 72</p> <p>1 I'll ask the court reporter to mark as</p> <p>2 Exhibit 2. And I'm going to share it on my</p> <p>3 screen so you can see what I'm looking at.</p> <p>4 Okay. Have you see the document</p> <p>5 that I'm showing you on my screen right now,</p> <p>6 Mr. Turner, before?</p> <p>7 A. Yes.</p> <p>8 (Whereupon, Plaintiff's</p> <p>9 Exhibit 2 was marked for</p> <p>10 identification.)</p> <p>11 Q. (By Ms. Sadasivan) And what is</p> <p>12 this document?</p> <p>13 A. This is a listing of the state</p> <p>14 career centers. The career centers that are</p> <p>15 located throughout the entire State of</p> <p>16 Alabama.</p> <p>17 Q. Okay. And how are you familiar</p> <p>18 with this document?</p> <p>19 A. It is part of our manual, and it</p> <p>20 is also listed on our website.</p> <p>21 Q. Okay. And so these are all of the</p> <p>22 career centers that exist in Alabama today?</p> <p>23 A. That's correct.</p> <p>24 Q. Okay. It says you're a senior</p> <p>25 center manager at the Mobile Comprehensive</p>

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<p style="text-align: right;">Page 73</p> <p>1 Office; is that right?</p> <p>2 A. That's correct.</p> <p>3 Q. Okay. And that's located at</p> <p>4 515 Springhill Plaza Court in Mobile?</p> <p>5 A. That's correct.</p> <p>6 Q. Okay. And there's also, as we</p> <p>7 discussed, the Alabama Career Center in Bay</p> <p>8 Minette, which is at 201 Faulkner Drive; is</p> <p>9 that right?</p> <p>10 A. That is correct.</p> <p>11 Q. And that's in Baldwin County,</p> <p>12 Alabama; is that right?</p> <p>13 A. That's correct.</p> <p>14 Q. Okay. And those locations are</p> <p>15 about 35 miles apart?</p> <p>16 A. That's correct.</p> <p>17 Q. Okay. Do you know how many</p> <p>18 Alabama Career Centers are located in the</p> <p>19 Black Belt?</p> <p>20 MS. MESSICK: Object to the form.</p> <p>21 THE WITNESS: I do not.</p> <p>22 Q. (By Ms. Sadasivan) If we went</p> <p>23 through this list, could you tell me which</p> <p>24 ones are in the Black Belt?</p> <p>25 MS. MESSICK: Object to the form.</p>	<p style="text-align: right;">Page 75</p> <p>1 A. That is how I would answer that</p> <p>2 question, yes.</p> <p>3 Q. Okay. And so what are the</p> <p>4 resources that a career center would provide</p> <p>5 job seekers?</p> <p>6 MS. MESSICK: Object to the form.</p> <p>7 THE WITNESS: The resources that a</p> <p>8 career center provide to a job seeker, of</p> <p>9 course, primarily we do job search assistance.</p> <p>10 So we help clients actually look</p> <p>11 for a job. And how we help them is we do an</p> <p>12 assessment of their skills. And we also</p> <p>13 assist them with building a resume. We assist</p> <p>14 them with mock interviewing. And we hold</p> <p>15 forums or job fairs, and especially in the</p> <p>16 Mobile Career Center where we have employers</p> <p>17 and job seekers come together, not on a grand</p> <p>18 stage, but on a much more intimate stage, so</p> <p>19 that they get an opportunity to have</p> <p>20 face-to-face contact. So we provide that</p> <p>21 access. And that's on the employment side.</p> <p>22 We also have access to the Federal</p> <p>23 funded programs that assist in skill</p> <p>24 development and skill enhancement and transfer</p> <p>25 of skills.</p>
<p style="text-align: right;">Page 74</p> <p>1 THE WITNESS: I could not name all</p> <p>2 of them. No, I could not name all of them.</p> <p>3 Q. (By Ms. Sadasivan) Okay.</p> <p>4 So let's just -- I'm going to stop</p> <p>5 sharing my screen for a second, and we can</p> <p>6 discuss. So and what are the -- what's the</p> <p>7 difference between a career center and a</p> <p>8 satellite site?</p> <p>9 A. The difference between a center</p> <p>10 and a satellite site is a center is dedicated</p> <p>11 strictly to the services that are provided</p> <p>12 under the Alabama Department of Labor. A</p> <p>13 satellite site will be a site where the</p> <p>14 career center is located within another body.</p> <p>15 It could be an educational facility, or it</p> <p>16 could be a library or something of that sort.</p> <p>17 So that's the difference.</p> <p>18 Q. And do you know whether or not the</p> <p>19 satellites are located at any historically</p> <p>20 black colleges or universities in Alabama?</p> <p>21 A. I do not, but I would say</p> <p>22 generally, no.</p> <p>23 Q. Okay. But there are career</p> <p>24 centers located at some two-year degree</p> <p>25 programs?</p>	<p style="text-align: right;">Page 76</p> <p>1 So it is a place where you can</p> <p>2 come together to not just look for a job, but</p> <p>3 to find access to -- how to get into a career.</p> <p>4 Q. Understood.</p> <p>5 Let me -- I'm going to put in the</p> <p>6 chat another document that I'll ask the court</p> <p>7 reporter to mark as Exhibit 3. And I'm going</p> <p>8 to show you on my screen what I just dropped</p> <p>9 into the chat. Can you see my screen,</p> <p>10 Mr. Turner?</p> <p>11 (Whereupon, Plaintiff's</p> <p>12 Exhibit 3 was marked for</p> <p>13 identification.)</p> <p>14 THE WITNESS: Yes.</p> <p>15 Q. (By Ms. Sadasivan) And do you</p> <p>16 recognize the document on my screen?</p> <p>17 A. Yes. That is the marketing</p> <p>18 manual or marketing brochure that we utilize</p> <p>19 for services.</p> <p>20 Q. I apologize. I'm going to</p> <p>21 represent to you that this is the printout of</p> <p>22 the Career Centers' Department of Labor</p> <p>23 website.</p> <p>24 A. Uh-huh.</p> <p>25 Q. Which I imagine is very similar to</p>

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<p style="text-align: right;">Page 77</p> <p>1 the, you know, internal manual or procedure. 2 But this is actually a printout of the 3 website. But does it look familiar to you as 4 a printout of the website? 5 A. Yes, it does. 6 Q. Okay. So it says -- let me just 7 scroll down a little bit to, I guess I'll be 8 scrolling down on the website. So it says on 9 page 3 of this, but lower under the find a 10 career center portion of the website, it says, 11 "Alabama's network of 57 one-stop Alabama 12 Career Centers and Satellites are 13 strategically located throughout the state." 14 Do you see that? 15 A. Yes. 16 Q. And do you know how Alabama's 17 career centers are strategically located 18 across the state? 19 MS. MESSICK: Object to the form. 20 THE WITNESS: Are you asking me do 21 I know where they're located? Is that the 22 question that you're asking? Or where each 23 site is located? Or help me understand your 24 question. 25 Q. (By Ms. Sadasivan) Sure. I'm</p>	<p style="text-align: right;">Page 79</p> <p>1 Q. (By Ms. Sadasivan) And are the 2 operating -- to the best of your knowledge, 3 are the operating hours of the career centers 4 standardized across Alabama? 5 A. The correct answer to that 6 question is, no, they are not standardized. 7 But they are within 30 to 45 minutes of the 8 same operating hours. 9 Q. And how do you know that the 57 10 career center offices are within 30 to 45 11 minutes of the same operating hours? 12 A. I have -- I can see the opening 13 and closing times. You can -- they have them 14 posted. So some offices open at 7:30. Some 15 offices open at 7:45. My office opens at 16 8:00. So they're all within that same range. 17 And, you know, either they close at 4:30, or 18 they close at 5:00. You know, there's not a 19 huge gap in the times that we open and close. 20 It's that 30-minute window. 21 Q. Okay. And do you know whether 22 senior managers have the ability to determine 23 the opening and closing windows of career 24 centers? 25 A. We do not have the authority to</p>
<p style="text-align: right;">Page 78</p> <p>1 asking, what does it mean that they -- that 2 the 57 career centers are strategically 3 located? So I'm asking specifically not their 4 location, but what it means when this website 5 of the Department of Labor says they are 6 strategically located? 7 MS. MESSICK: Object to the form. 8 THE WITNESS: Under the 9 legislation that established the Alabama 10 Career Center system, the strategic location 11 of those career centers were mandated to be 12 centrally-located offices so that the 13 population would have fair access to those 14 sites based upon the area that it was in. It 15 had be located centrally to the area that the 16 most people could get the most service out of 17 the career center. That was the purpose of 18 strategically locating them. 19 Q. (By Ms. Sadasivan) So 20 strategically means centrally to increase 21 access to the center? 22 A. Yes. 23 MS. MESSICK: Object to the form. 24 THE WITNESS: I'm sorry. I'm 25 sorry. Yes.</p>	<p style="text-align: right;">Page 80</p> <p>1 determine, but we can, based upon our 2 experience, suggest. 3 Q. And who determines the opening and 4 closing hours of a career center? 5 A. That is a decision made between 6 the secretary of labor and the director of 7 employment services. 8 Q. Okay. But at the local level, 9 those operating hours are different, even 10 though the secretary of labor and the 11 department head are making the determination 12 of opening and closing times? 13 MS. MESSICK: Object to the form. 14 THE WITNESS: They make the final 15 decision. We make the recommendation. 16 Q. (By Ms. Sadasivan) Okay. All 17 right. It's -- is there a minimum number of 18 hours a career center must be open? 19 A. Not to my knowledge. 20 Q. I am going to stop sharing my 21 screen. 22 MS. MESSICK: Kathryn, would this 23 be a good time for a break? We've been going 24 for a little over an hour and a half. 25 MS. SADASIVAN: Sure. If you</p>

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<p style="text-align: right;">Page 81</p> <p>1 would like a break, Mr. Turner, that's fine by 2 me. 3 THE WITNESS: Sure. I'm fine with 4 that. I'll take a break. 5 MS. SADASIVAN: Okay. Do you 6 want -- we'll say like ten-minute break, and 7 we can come back at noon central time? 8 THE WITNESS: That's fine with me. 9 MS. MESSICK: Thank you. 10 (A short break was taken.) 11 Q. (By Ms. Sadasivan) Mr. Turner, 12 we're back after our break. It's noon. 13 I just want to confirm, did you 14 have any conversations with Ms. Messick or 15 Mr. Harrison during the break? 16 A. Let me be sure about -- I'm 17 sorry. 18 MR. HARRISON: I would object to 19 attorney/client privilege. 20 MS. SADASIVAN: You object to me 21 asking whether or not he spoke with you -- 22 MR. HARRISON: I object to -- 23 MS. SADASIVAN: -- and Ms. Messick 24 during the break? 25 MR. HARRISON: I object to him</p>	<p style="text-align: right;">Page 83</p> <p>1 A. Yes, I can. 2 Q. Okay. And are you familiar 3 with -- I'll represent to you that this is a 4 website of the Alabama Career Center System 5 Region 7, that it's a printout. Does this 6 look familiar to you? 7 A. Yes, it does. 8 Q. Okay. And do you recognize this 9 printout? 10 A. Yes, I do. 11 Q. Okay. And how do you recognize 12 it? 13 A. That is either a brochure or 14 from the website that describes Region 7 15 which contains the Mobile Career Center and 16 the other sites that are -- that compose 17 Region 7. 18 Q. Okay. And so when we were talking 19 earlier about how the career sites are 20 strategically located, is it correct that you 21 stated that the strategically located means 22 that they are centrally located to increase 23 access? 24 A. That's correct. 25 Q. Okay. And so how many regions are</p>
<p style="text-align: right;">Page 82</p> <p>1 answering that question. He can answer 2 whether he spoke to us, but not to the 3 contents of the communication. 4 MS. SADASIVAN: Right. 5 Q. So I just asked did you speak to 6 Ms. Messick and Mr. Harrison during the break? 7 A. Yes, we did speak. 8 Q. Okay. And did you talk about your 9 testimony in this deposition? 10 A. No, we did not. 11 Q. Okay. All right. 12 So before we went on break, we 13 were discussing the location of the career 14 centers throughout Alabama. 15 A. (Witness nods head.) 16 Q. And I would like to show you 17 quickly what I will drop into the chat and 18 what I will ask the court reporter to mark as 19 Exhibit 4. And I'm going to share my screen 20 as well so you can see, Mr. Turner. 21 (Whereupon, Plaintiff's 22 Exhibit 4 was marked for 23 identification.) 24 Q. (By Ms. Sadasivan) Can you see my 25 screen yet?</p>	<p style="text-align: right;">Page 84</p> <p>1 the career centers divided into? 2 A. Seven. 3 Q. Seven. Okay. And so in Region 7, 4 there are a number of career centers listed 5 here in Baldwin County, in Choctaw, Clarke, 6 Conecuh, Escambia, Mobile, Monroe, Washington, 7 and Wilcox County; is that right? 8 A. That's correct. 9 Q. Okay. And how are career center 10 regions divided? 11 MS. MESSICK: Object to the form. 12 THE WITNESS: The regions are 13 geographically assigned. 14 Q. (By Ms. Sadasivan) Okay. 15 And are they grouped in any other 16 manner besides geography? 17 MS. MESSICK: Object to the form. 18 THE WITNESS: No, not to my 19 knowledge. Let me state that, to my 20 knowledge, they are not. 21 Q. (By Ms. Sadasivan) Okay. 22 Do you know -- I guess let me just 23 ask quickly. So we were talking about the 24 career center hours, and you said they are not 25 required to be standardized, but they have</p>

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<p style="text-align: right;">Page 85</p> <p>1 similar operating hours across the state.</p> <p>2 What about satellite career centers?</p> <p>3 A. My answer to --</p> <p>4 Q. I'm sorry.</p> <p>5 A. I'm sorry. Go ahead with your</p> <p>6 question.</p> <p>7 Q. No, no. I was just going to</p> <p>8 re-ask the same question.</p> <p>9 A. Okay. Go ahead.</p> <p>10 Q. Do satellite career centers have</p> <p>11 the same hours or hold the same hours as the</p> <p>12 local career centers?</p> <p>13 MS. MESSICK: Object to the form.</p> <p>14 THE WITNESS: Those sites' hours</p> <p>15 are determined by the host, not by us who are</p> <p>16 guests in those sites. So we don't have any</p> <p>17 control over their hours. We just have to fit</p> <p>18 within their hours.</p> <p>19 Q. (By Ms. Sadasivan) Okay.</p> <p>20 But -- so here this website lists</p> <p>21 the satellite career centers as having limited</p> <p>22 operating hours. Does that accord with your</p> <p>23 understanding of the kind of operating hours</p> <p>24 of the satellite career centers?</p> <p>25 A. That is correct.</p>	<p style="text-align: right;">Page 87</p> <p>1 So I am part of the total managers' meetings.</p> <p>2 But then the other offices within Region 7,</p> <p>3 that those managers meet more often because</p> <p>4 they run programs that I don't have in my</p> <p>5 career center.</p> <p>6 Q. (By Ms. Sadasivan) Okay.</p> <p>7 What programs do other managers in</p> <p>8 Region 7 have that the Mobile office does not</p> <p>9 have?</p> <p>10 A. Those managers manage directly</p> <p>11 the WIOA training program. In my office, the</p> <p>12 WIOA training program is ran by SWAPTE, which</p> <p>13 is another body.</p> <p>14 Q. So the WIOA training program, what</p> <p>15 is that?</p> <p>16 A. It is the Workforce Innovation</p> <p>17 Act Training Program. It is the Federally</p> <p>18 funded program that I talked about earlier</p> <p>19 that pays for education and training. That</p> <p>20 program, in my office in the Mobile Career</p> <p>21 Center, there's a separate body that manages</p> <p>22 the implementation of that program. In the</p> <p>23 other sites outside of my office, they're run</p> <p>24 by the career center manager directly.</p> <p>25 Q. But it's not -- so both the Mobile</p>
<p style="text-align: right;">Page 86</p> <p>1 Q. Okay. So they're more limited</p> <p>2 than general career centers?</p> <p>3 A. Correct.</p> <p>4 Q. Do managers in the career centers</p> <p>5 in Region 7 meet?</p> <p>6 A. Yes.</p> <p>7 Q. How often?</p> <p>8 A. The -- we have managers'</p> <p>9 meetings where we meet as a whole body two to</p> <p>10 three times a year. But because the other</p> <p>11 offices have to do specific reports that are</p> <p>12 unique to those offices different from the</p> <p>13 Mobile office, they meet more often than the</p> <p>14 Mobile Career Center -- than I meet with all</p> <p>15 the managers.</p> <p>16 Q. Okay. So I'm maybe not</p> <p>17 understanding. So the managers in Region 7</p> <p>18 meet two to three times a year?</p> <p>19 A. Correct.</p> <p>20 Q. And are you saying that in Mobile,</p> <p>21 you meet less than two to three times?</p> <p>22 MS. MESSICK: Object to the form.</p> <p>23 THE WITNESS: No, that's not what</p> <p>24 I'm saying. What I'm saying is, they meet</p> <p>25 more often than I meet with the whole body.</p>	<p style="text-align: right;">Page 88</p> <p>1 and those other offices have the WIOA training</p> <p>2 program?</p> <p>3 A. That's correct.</p> <p>4 Q. So there are no differences in the</p> <p>5 services provided between the Mobile Career</p> <p>6 Center and the other career centers?</p> <p>7 MS. MESSICK: Object to the form.</p> <p>8 THE WITNESS: That is correct.</p> <p>9 Q. (By Ms. Sadasivan) Okay.</p> <p>10 Is there any other program that</p> <p>11 the other offices in Region 7 provide that the</p> <p>12 Mobile branch does not provide or provides</p> <p>13 differently?</p> <p>14 A. Yes. In the Mobile Career</p> <p>15 Center, I manage -- well, I don't manage.</p> <p>16 But housed in my facility, I also have the</p> <p>17 Telamon, T-e-l-a-m-o-n, Corporation, which is</p> <p>18 a migrant and seasonal farm worker program.</p> <p>19 I also house the Easterseals program, which</p> <p>20 is a senior workers program. And I also</p> <p>21 house the Mobile Unemployment Tax Unit, which</p> <p>22 are all housed in my facility. They are</p> <p>23 renters. They pay rent to be in my facility.</p> <p>24 Q. Okay. And so these are private</p> <p>25 entities that you have a partnership with in</p>

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<p style="text-align: right;">Page 89</p> <p>1 the Mobile branch?</p> <p>2 A. The Mobile Unemployment Tax is a</p> <p>3 state department. Telamon is a Federally</p> <p>4 funded program, but they are not state</p> <p>5 employees.</p> <p>6 Q. Okay. And --</p> <p>7 A. And Easterseals, I would say --</p> <p>8 Q. -- the career centers --</p> <p>9 MS. MESSICK: Excuse me, Kathryn.</p> <p>10 Q. -- do not offer these services or</p> <p>11 do not house these funds; is that correct?</p> <p>12 MS. MESSICK: Excuse me. Kathryn,</p> <p>13 he was still answering.</p> <p>14 MS. SADASIVAN: Oh, I'm sorry.</p> <p>15 MS. MESSICK: Could the court</p> <p>16 reporter read back where he was answering, so</p> <p>17 he can finish the answer.</p> <p>18 And then I tried to interrupt you,</p> <p>19 Kathryn. You didn't hear me. So we'll need</p> <p>20 to hear your question again.</p> <p>21 MS. SADASIVAN: Would you mind</p> <p>22 just speaking up a little bit? I'm so sorry.</p> <p>23 But I'm having trouble hearing you.</p> <p>24 MS. MESSICK: Okay. Are you</p> <p>25 having trouble hearing just me or him too?</p>	<p style="text-align: right;">Page 91</p> <p>1 branch provides?</p> <p>2 MS. MESSICK: Object to the form.</p> <p>3 Q. (By Ms. Sadasivan) And I'll just</p> <p>4 clarify for the record.</p> <p>5 A. Yeah, please.</p> <p>6 Q. So in terms of the services that</p> <p>7 the Mobile branch provides that the other</p> <p>8 centers in Region 7 don't provide, can you</p> <p>9 explain to me what those services are</p> <p>10 specifically?</p> <p>11 A. I can give you a description of</p> <p>12 what those entities within my facility does.</p> <p>13 The Mobile Unemployment Tax Unit is the unit</p> <p>14 that's responsible for collecting</p> <p>15 unemployment tax from businesses, and that</p> <p>16 office operates Mobile and Baldwin County.</p> <p>17 So that makes their department unique to the</p> <p>18 other offices.</p> <p>19 The Telamon Corporation, again,</p> <p>20 which works with the migrant and seasonal</p> <p>21 farm worker program, is based out of my</p> <p>22 office, and those employees travel throughout</p> <p>23 the state to provide their services. So they</p> <p>24 are just based in my office.</p> <p>25 So the other sites don't have</p>
<p style="text-align: right;">Page 90</p> <p>1 MS. SADASIVAN: Well, that's why I</p> <p>2 guess I didn't realize I had spoken when you</p> <p>3 were speaking, Mr. Turner. I apologize. But</p> <p>4 I'm having like a little bit of trouble</p> <p>5 hearing both of you.</p> <p>6 MS. MESSICK: I'm going to move</p> <p>7 the TV closer and see if that helps.</p> <p>8 MS. SADASIVAN: Yeah. Apologies,</p> <p>9 if the court reporter -- if you don't mind</p> <p>10 just reading back where Mr. Turner was. I</p> <p>11 apologize. And I'll let you finish your</p> <p>12 answer this time.</p> <p>13 THE WITNESS: Are you ready for</p> <p>14 me?</p> <p>15 MS. MESSICK: Yes, please.</p> <p>16 Q. (By Ms. Sadasivan) You can</p> <p>17 continue.</p> <p>18 A. Okay. Easterseals is a</p> <p>19 nonprofit organization. And that's the end</p> <p>20 of my response.</p> <p>21 Q. Okay. And so no other career</p> <p>22 center in Region 7 houses these entities?</p> <p>23 A. That is correct.</p> <p>24 Q. And in terms of services, how does</p> <p>25 that relate to the services that the Mobile</p>	<p style="text-align: right;">Page 92</p> <p>1 the consistent access to that state -- to</p> <p>2 that staff. But as needed, the staff travels</p> <p>3 to those other areas to provide service.</p> <p>4 And Goodwill Easterseals Senior</p> <p>5 Aid Program is specifically for Mobile</p> <p>6 County.</p> <p>7 So the other offices don't have</p> <p>8 an Easterseals program located in their</p> <p>9 office.</p> <p>10 Q. So it's possible then that, at</p> <p>11 least with respect to the tax and the senior</p> <p>12 programs, that other career centers might</p> <p>13 offer similar or house similar programs or</p> <p>14 entities to those?</p> <p>15 MS. MESSICK: Object to the form.</p> <p>16 THE WITNESS: Are you asking me</p> <p>17 are they co-located, or are you asking does --</p> <p>18 do people have access to those programs in</p> <p>19 their area? Is that what you're asking me?</p> <p>20 Q. (By Ms. Sadasivan) Yes. I'm</p> <p>21 asking do people have similar -- in the career</p> <p>22 centers in Region 7, do people have access to</p> <p>23 similar services, even if not from those same</p> <p>24 entities?</p> <p>25 A. Yes. Oh, yeah, I mean, you can</p>

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<p style="text-align: right;">Page 93</p> <p>1 house other bodies their centers, yes.</p> <p>2 Q. Right. Okay. So it's possible</p> <p>3 that other career centers in Region 7 house</p> <p>4 like a senior workers program?</p> <p>5 A. If your question is, do they</p> <p>6 house them, I would say no. Can they house</p> <p>7 them, I would say yes.</p> <p>8 Q. Okay. And would you say that</p> <p>9 there are similarities in the career center</p> <p>10 services provided in Region 7?</p> <p>11 MS. MESSICK: Object to the form.</p> <p>12 THE WITNESS: Yes.</p> <p>13 Q. (By Ms. Sadasivan) And what are</p> <p>14 those similarities?</p> <p>15 A. The education and training, the</p> <p>16 veterans services, the access to adult</p> <p>17 rehabilitation, and the access to -- because</p> <p>18 we've got rehab -- adult education. That's</p> <p>19 the other component that they provide access</p> <p>20 to.</p> <p>21 Q. Okay. And do individuals seeking</p> <p>22 services at career centers in Region 7 share</p> <p>23 educational similarities?</p> <p>24 MS. MESSICK: Object to the form.</p> <p>25 THE WITNESS: Ask your question</p>	<p style="text-align: right;">Page 95</p> <p>1 many individuals seek services both at the</p> <p>2 Mobile Career Center and in other career</p> <p>3 centers in Region 7?</p> <p>4 MS. MESSICK: Object to the form.</p> <p>5 THE WITNESS: That's not a topic</p> <p>6 that I have, you know, done any research on.</p> <p>7 Q. (By Ms. Sadasivan) And you</p> <p>8 don't -- do you have any data that would give</p> <p>9 you that information?</p> <p>10 A. I don't have it. But there's a</p> <p>11 way to -- to put together a report to show</p> <p>12 it.</p> <p>13 Q. So the career center tracks</p> <p>14 individuals who seek services from its</p> <p>15 offices?</p> <p>16 A. Absolutely, yes.</p> <p>17 Q. And do you know if that data that</p> <p>18 is tracked includes the individual's race who</p> <p>19 is seeking services?</p> <p>20 A. Yes, it does.</p> <p>21 Q. Okay. And do you know where that</p> <p>22 information is kept or how that information is</p> <p>23 kept?</p> <p>24 A. We have a system called Alabama</p> <p>25 Works.</p>
<p style="text-align: right;">Page 94</p> <p>1 again, please.</p> <p>2 Q. (By Ms. Sadasivan) Do individuals</p> <p>3 seeking services at career centers in Region 7</p> <p>4 share in educational similarities?</p> <p>5 MS. MESSICK: Object to the form.</p> <p>6 THE WITNESS: I wouldn't have</p> <p>7 knowledge of that.</p> <p>8 Q. (By Ms. Sadasivan) Do individuals</p> <p>9 seeking career services in Region 7 share</p> <p>10 career similarities?</p> <p>11 MS. MESSICK: Object to the form.</p> <p>12 THE WITNESS: The correct answer</p> <p>13 to that is no. The explanation to that is,</p> <p>14 Mobile is more of a metropolitan area. And</p> <p>15 the other office are located in rural areas.</p> <p>16 So the types of opportunities and the types of</p> <p>17 training and -- would be different because of</p> <p>18 the makeup of the communities.</p> <p>19 Q. (By Ms. Sadasivan) Okay.</p> <p>20 And you mentioned earlier that you</p> <p>21 see individuals seeking services at the Mobile</p> <p>22 Career Center that also seek services in other</p> <p>23 offices; is that right?</p> <p>24 A. That's correct.</p> <p>25 Q. And do you know approximately how</p>	<p style="text-align: right;">Page 96</p> <p>1 Q. Okay.</p> <p>2 A. And it allows you to compile,</p> <p>3 you know, demographic statistics along with</p> <p>4 the Alabama Department of Labor information.</p> <p>5 Q. And have you ever compiled a</p> <p>6 report on the number of individuals who are</p> <p>7 seeking employment services by race at any</p> <p>8 career center in Alabama?</p> <p>9 A. I -- not seeking work. But I</p> <p>10 did compile a report of the racial makeup of</p> <p>11 applicants for our training program.</p> <p>12 Q. And what did that report show?</p> <p>13 A. That report showed that it was</p> <p>14 54 percent black, 41 percent white, and the</p> <p>15 remaining amount was other races.</p> <p>16 Q. And so that is just at the Mobile</p> <p>17 Career Center --</p> <p>18 A. That's correct.</p> <p>19 Q. -- is that right?</p> <p>20 A. I'm sorry.</p> <p>21 Q. And when that was report that you</p> <p>22 looked at?</p> <p>23 A. That report was created --</p> <p>24 generated last week.</p> <p>25 Q. Okay. So it's fair to say then</p>

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1 that more black people in Mobile County are
2 seeking training or some sort of training
3 service from the career center than white
4 Alabamians in Mobile County?
5 A. That's correct.
6 Q. Okay. So going back to Region 7,
7 do you -- you said you didn't know how often
8 individuals from other career centers were
9 also requesting services from Mobile; is that
10 right?
11 A. That's correct.
12 Q. Do you know whether there are
13 industries in Mobile that also employ
14 individuals from those career centers in
15 Region 7?
16 MS. MESSICK: Object to the form.
17 Q. (By Ms. Sadasivan) In other words,
18 are employers in Mobile connected with
19 individuals seeking employment opportunities
20 in other career centers in Region 7?
21 A. Yes.
22 Q. Which industries?
23 A. The shipping industry, the
24 aircraft industry, the chemical plant
25 industry, the medical industry, the trucking

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1 industry. I think those would be the larger
2 bodies, if -- you know, I wouldn't want to
3 break it down any further. But those are the
4 major industries.
5 Q. So is it fair to say then that
6 individuals from those rural counties in
7 Region 7 seek employment in the major
8 industries available in Mobile County?
9 MS. MESSICK: Object to the form.
10 THE WITNESS: That's a fair
11 question, yes.
12 Q. (By Ms. Sadasivan) Okay.
13 I'll take down this exhibit that
14 I'm sharing with you now.
15 We talked earlier about the types
16 of services that the career centers provide to
17 individuals, you know, seeking services there.
18 And I think you listed a number of them. But
19 I want to reshow you what we marked as
20 Exhibit 3, which is the career centers
21 website. And I'm just going to pull -- show
22 you again the services. Actually, let me show
23 you something different, I apologize. I'm
24 going to show you and I'm going to add to the
25 chat what I'm going to ask the court reporter

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1 to mark as Exhibit 5. I'm going to show it to
2 you on my screen.
3 (Whereupon, Plaintiff's
4 Exhibit 5 was marked for
5 identification.)
6 Q. (By Ms. Sadasivan) Okay.
7 So I'm showing you on my screen
8 what I've asked the court reporter to mark as
9 Exhibit 5. And I'll represent to you that
10 this a printout again of the Alabama
11 Department of Labor's labor market information
12 report. Does this look generally familiar to
13 you, Mr. Turner?
14 A. Yes.
15 MS. MESSICK: Object to the form.
16 THE WITNESS: I'm sorry.
17 Q. (By Ms. Sadasivan) You can answer.
18 A. Yes, it does.
19 Q. Okay. And what is this that I'm
20 showing you on my screen?
21 A. What you're showing me on the
22 screen is the labor market information
23 department's website that shows you how to
24 gather demographic information as it relates
25 to employment, unemployment, seasonal trends,

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1 job-specific descriptions, and how you can
2 search for them throughout the state to
3 determine, you know, which industries are
4 growing, which industries are shrinking.
5 There's a lot that you can do with the LMI
6 site as far as gathering statistics to help
7 you for a job seeker to find the right area,
8 you know, or the growing areas or to find the
9 areas that are trending down. And then it
10 also is a tool that employers can use to see,
11 you know, the best place to place industry to
12 get the most workforce participation.
13 Q. Okay. And do you know who
14 prepares these labor market information
15 reports?
16 A. The -- they are statisticians.
17 You know, they're numbers people. They have
18 their -- they are contained within the
19 Department of Labor. So there's a specific
20 department of individual statisticians that
21 puts that information together.
22 Q. And is that -- is any part of that
23 done at the career center level?
24 A. No. No, it's all done from
25 central office in Montgomery.

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1 Q. Okay. All right.
2 I'm going to take this down.
3 So are you -- do you know whether
4 or not -- or the demographics, rather, of
5 information -- of individuals who lack health
6 insurance between the ages of 19 and 64?
7 MS. MESSICK: Object to the form.
8 THE WITNESS: I do not.
9 Q. (By Ms. Sadasivan) Okay.
10 And would it surprise you if black
11 people in Alabama were more likely to lack
12 health insurance -- black people between the
13 ages of 19 and 64 were more likely to lack
14 health insurance than white people in Alabama?
15 MS. MESSICK: Object to the form.
16 THE WITNESS: It would not
17 surprise me.
18 Q. (By Ms. Sadasivan) And why not?
19 A. Normally health insurance is
20 tied to employment. If employment numbers
21 are lower, then the access to insurance
22 numbers would be lower.
23 Q. Okay. And do you know -- speaking
24 of the hospital industry, do you know whether
25 other individuals in Region 7 might come to

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1 Mobile to work in the hospital industry or
2 medical industry in particular?
3 MS. MESSICK: Object to the form.
4 THE WITNESS: I have a general
5 knowledge of that simply because those
6 individuals will come to the career center to
7 see where opportunities are outside of the
8 websites for the specific medical facilities.
9 And then individuals come to the career center
10 to get into training programs to get into the
11 medical field. They come from other areas to
12 attend our schools.
13 Q. (By Ms. Sadasivan) And do you know
14 whether or not there are major hospitals in
15 the rural area north of Mobile in the Black
16 Belt?
17 MS. MESSICK: Object to the form.
18 THE WITNESS: I do not.
19 Q. (By Ms. Sadasivan) Do you know
20 whether the median income for black Alabamians
21 is lower than the median income for white
22 Alabamians?
23 A. I do.
24 Q. You do?
25 A. (Witness nods head.)

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1 Q. And is it lower for black
2 Alabamians than white Alabamians?
3 A. Yes, it is.
4 Q. And do you know why that is?
5 A. Again, I would go back to the
6 fact that -- with the employment rate being
7 lower. You know, those numbers are just
8 going to fall in line. I mean, it's going to
9 trend -- be under to same trend.
10 Q. And do you know whether family
11 poverty is greater for black Alabamians than
12 white Alabamians?
13 A. I do.
14 Q. And is family poverty greater for
15 black Alabamians than white Alabamians?
16 A. The proper answer to that is
17 that proportionately it is greater. But it
18 may not be statically greater simply because
19 there are more whites than blacks. So if we
20 do proportions or if we're doing statistics,
21 the answer can vary.
22 Q. Okay. So that's a good
23 qualification. So I'm asking as a percentage
24 of the population. But thank you for that
25 helpful clarification. That is right.

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1 Do you know whether the presence
2 of a vehicle in a household is proportionately
3 greater for white Alabamians than black
4 Alabamians?
5 A. Could you repeat question? I
6 missed a word that you said.
7 Q. Sure. Do you know whether -- so
8 the statistics that's listed in American
9 Community Survey as the presence of a vehicle,
10 which mean access to a vehicle within a
11 household. Do you know whether access to a
12 vehicle within a household as proportioned is
13 greater for white Alabamians than black
14 Alabamians?
15 A. No, I do not.
16 Q. Okay. Would it surprise you if
17 black Alabamians had a lower proportional
18 access to a vehicle than white Alabamians?
19 MS. MESSICK: Object to the form.
20 THE WITNESS: Are you asking me
21 would it surprise me?
22 Q. (By Ms. Sadasivan) Would it
23 surprise you?
24 A. No.
25 Q. Why not?

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<p style="text-align: right;">Page 105</p> <p>1 A. Based upon metropolitan use and 2 where I live, the number of people who use 3 public transportation is higher in the 4 minority community than it is in the white 5 community. So that means that fewer of them 6 have, you know, vehicles. They have to use 7 public transportation. So it would be, you 8 know, a rational conclusion that, you know, 9 the number is higher.</p> <p>10 Q. (By Ms. Sadasivan) So you do know 11 that black Alabamians are more dependent upon 12 public transportation than white Alabamians?</p> <p>13 MS. MESSICK: Object to the form.</p> <p>14 THE WITNESS: My answer would have 15 to be more of a regional answer than a 16 statewide answer. So my regional answer would 17 be yes, but I can't speak to the state because 18 it's so diverse once you travel outside of 19 where I live.</p> <p>20 Q. (By Ms. Sadasivan) Absolutely.</p> <p>21 Okay. Do you know whether black 22 Alabamians and white Alabamians have equal 23 access to a computer or the internet?</p> <p>24 A. My answer to that question is, 25 based upon what I have heard from the media</p>	<p style="text-align: right;">Page 107</p> <p>1 would be based on the proportion of the 2 population. You know, there's fewer black 3 people. So there would be fewer black people 4 with access to those resources.</p> <p>5 And then also tying that back to 6 the economic status of those people, you 7 know, being able to afford internet services.</p> <p>8 So, no, it would not surprise me that black 9 people have less access.</p> <p>10 Q. Okay. And do you know whether 11 black Alabamians and white Alabamians are -- I 12 guess -- let me go back and rephrase.</p> <p>13 Do you know whether black 14 Alabamians and white Alabamians are equally 15 dependent on food stamps or SNAPs in Alabama?</p> <p>16 A. I do not know that.</p> <p>17 Q. Would it surprise you if black 18 Alabamians were the greater proportion of the 19 recipients of food stamps or SNAP than white 20 Alabamians?</p> <p>21 MS. MESSICK: Object to the form.</p> <p>22 THE WITNESS: Proportionately, if 23 we are doing it based upon proportion, then I 24 would say yes. But statistically I would say 25 no.</p>
<p style="text-align: right;">Page 106</p> <p>1 in various stories, that the access to 2 internet and technology is more of a regional 3 thing than a racial thing. If you are living 4 in a metropolitan area, the number of people 5 who have access to technology is greater than 6 those who live in a rural community. But the 7 makeup of those rural communities, you know, 8 vary. You know, you have predominantly black 9 rural communities. You have predominantly 10 white rural communities. So those numbers -- 11 you understand where I'm going with that? 12 The numbers can be similar to those who have 13 access because of -- you know, based upon the 14 makeup of the area you're talking about.</p> <p>15 Q. Okay. And would it surprise you 16 then -- and I understand what you're referring 17 to between the rural and urban and the 18 regional issue.</p> <p>19 Would it surprise you to find then 20 that black Alabamians were more likely to lack 21 computer or internet access than white 22 Alabamians?</p> <p>23 A. That would not surprise me, no.</p> <p>24 Q. And why not?</p> <p>25 A. White Alabamians -- my answer</p>	<p style="text-align: right;">Page 108</p> <p>1 Q. (By Ms. Sadasivan) Okay.</p> <p>2 So, just so that I understand, you 3 think that the overall number of people -- 4 white individuals who are dependent or 5 recipients of food stamps or SNAP is greater 6 overall than the number of black Alabamians?</p> <p>7 A. I would say yes.</p> <p>8 Q. Would you be surprised, though, if 9 black Alabamians overall were a greater number 10 of recipients of food stamps and SNAP than 11 white Alabamians?</p> <p>12 MS. MESSICK: Object to the form.</p> <p>13 THE WITNESS: Based on proportion, 14 you know, a percentage of population, I would 15 say, yes, that is probably a greater number.</p> <p>16 Q. (By Ms. Sadasivan) Okay.</p> <p>17 I think we talked a little bit 18 about education. But do you know whether a 19 higher percentage of black Alabamian residents 20 have not graduated from high school than white 21 Alabama residents?</p> <p>22 A. I do not.</p> <p>23 Q. And in your work with the career 24 centers, do you have the ability to see or to 25 look at data on the number of individuals</p>

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1 requesting services who lack a high school
2 degree?
3 A. We could pull that up in our
4 system. We could generate a report that
5 would show us the number of people who have a
6 diploma versus the ones who do not. Yes, we
7 can generate that in the system.
8 Q. Okay. And based on your personal
9 experience in the Mobile Career Center, do you
10 have an opinion either way on whether or not
11 black Mobile residents are more likely to lack
12 a high school degree than white Mobile
13 residents?
14 MS. MESSICK: Object to the form.
15 THE WITNESS: My opinion would
16 be -- I'm sorry. Did we lose them? My
17 opinion would be proportionally those numbers
18 are similar. The dropout rate may be greater
19 in the white community over the black
20 community, I think, in Mobile.
21 Q. (By Ms. Sadasivan) What do you
22 mean by the drop off (sic)?
23 A. Dropout. Dropout. You're
24 talking about less than a high school
25 diploma; right?

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1 Q. Okay. Have you experienced
2 discrimination in the State of Alabama?
3 A. You're talking about me
4 personally; right?
5 Q. You personally.
6 A. Yes, I have.
7 Q. Can you describe it? I apologize
8 for asking. I know it's an uncomfortable
9 thing to have to talk about. But can you
10 describe the discrimination that you have
11 experienced?
12 MS. MESSICK: Object to the form.
13 THE WITNESS: There have been
14 specific incidents where I was told that I was
15 not welcome based upon my race. And also --
16 and I don't know if this is discrimination or
17 if it was racist versus discrimination, that I
18 was asked to not serve -- you know, wait on a
19 client -- specific client because of my race,
20 that they preferred to have a white person
21 wait on them. So, you know, it's not
22 necessarily discrimination as it is, you know,
23 an incidence of racism.
24 Q. (By Ms. Sadasivan) And just so I
25 understand, when you're talking about

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1 discrimination, you mean discrimination from a
2 like a state entity or a city or something
3 like that and racism being something that just
4 happened between two individuals?
5 A. Yeah.
6 MS. MESSICK: Object to the form.
7 THE WITNESS: I'm sorry. I'm
8 sorry.
9 Q. (By Ms. Sadasivan) You can --
10 would you mind just describing the difference
11 that you're drawing --
12 A. Yeah.
13 Q. -- between discrimination and
14 racism?
15 A. Yeah. To me, discrimination is
16 something that a -- is a denial of access.
17 And racism is a act between, you know, an
18 individual.
19 Q. Okay. And so when you say you
20 were not welcome certain places because of
21 your race, what types of places were you not
22 welcome in because of your race?
23 A. There -- restaurants, you know.
24 There is a restaurant that had a sign that
25 basically, you know, blacks weren't welcome.

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1 I didn't know until I got up to the door, you
2 know, that's what -- that's what it was.
3 And there is -- and this was --
4 this was years and years ago -- a golf course
5 that was not open. And, you know, although
6 it was not said out loud, it was known that,
7 you know, you couldn't go play there because
8 you were black.
9 Q. And I know you said this was years
10 and years ago. But around when was it that,
11 you know, we're talking about?
12 A. Oh, God. We're talking, you
13 know, you early '90s.
14 Q. Early '90s?
15 A. Yeah.
16 Q. Where they were still those kind
17 of, it's technically open to everyone, but as
18 a matter of course, black people and people of
19 color were denied the opportunity to join, for
20 example?
21 MS. MESSICK: Object to the form.
22 THE WITNESS: Yeah. You could not
23 join for sure.
24 Q. (By Ms. Sadasivan) Right. And
25 where was that golf course located?

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<p>1 A. It's in Mobile.</p> <p>2 Q. In Mobile. Okay.</p> <p>3 Were there other places like that</p> <p>4 that you're aware where it was technically,</p> <p>5 you know, open to anyone, but, as a matter of</p> <p>6 practice, black people or people of color were</p> <p>7 generally not welcome?</p> <p>8 MS. MESSICK: Object to the form.</p> <p>9 THE WITNESS: The truthful answer</p> <p>10 is, there were places, but, I mean, you know,</p> <p>11 it's been a long time since, you know, we've</p> <p>12 had those issues. And so I wouldn't want to</p> <p>13 try to give a specific example because, you</p> <p>14 know, it's been a long time since we've been</p> <p>15 confronted with that type of issue. Things</p> <p>16 have kind moderated a bit since then.</p> <p>17 Q. (By Ms. Sadasivan) And when you</p> <p>18 say "we," do you mean you specifically, or do</p> <p>19 you mean black people generally?</p> <p>20 A. Black people generally.</p> <p>21 Q. So you're saying that black people</p> <p>22 generally don't experience that kind of</p> <p>23 discrimination today?</p> <p>24 A. I wouldn't speak for black</p> <p>25 people as a whole body. But my community,</p>	<p>1 file a claim if -- you know, based upon merit,</p> <p>2 you know. Or if it's a presumption versus</p> <p>3 reality, you know, we'll kind of say, hey,</p> <p>4 look, you know, you may want to file a case,</p> <p>5 you know, if you have facts that can back it</p> <p>6 up. But not just to use it as an excuse from</p> <p>7 getting fired for bad behavior, you know. We,</p> <p>8 you know, kind of have that conversation to</p> <p>9 say, look, you know, this is more, you know,</p> <p>10 your performance versus racial discrimination.</p> <p>11 You know, this, you know, is how you describe</p> <p>12 racial discrimination.</p> <p>13 Q. (By Ms. Sadasivan) Do you know</p> <p>14 whether black people tend to vote for black</p> <p>15 candidates in Alabama?</p> <p>16 A. The correct answer to that</p> <p>17 question is, no, I don't know that. But do I</p> <p>18 believe that that is a perception that is</p> <p>19 based in some reality, then, I would say yes.</p> <p>20 Q. Okay. And so why do you believe</p> <p>21 that that's a perception based in reality?</p> <p>22 A. Because the majority of</p> <p>23 democratic -- of democratic voters in my</p> <p>24 social circle vote democratically. Is that</p> <p>25 the answer to your -- or can you ask me the</p>
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<p>1 you know, my social circle, you don't hear</p> <p>2 about as many types of issues as we used to</p> <p>3 hear about years ago.</p> <p>4 Q. Okay. But you do still hear about</p> <p>5 issues of discrimination faced by black people</p> <p>6 along the lines we just discussed?</p> <p>7 A. The answer to that question is,</p> <p>8 what I hear now are clients that come in</p> <p>9 talking about discrimination that they face</p> <p>10 in the workplace. You know, and it's based</p> <p>11 promotions. It's based on assignments of</p> <p>12 duties. You know, they'll come in with those</p> <p>13 types -- you know, reasons for termination.</p> <p>14 That's what I hear about more now.</p> <p>15 Q. Right. And when you kind of hear</p> <p>16 about these employment-related discrimination,</p> <p>17 do you know whether or not those individuals</p> <p>18 all, for example, file a charge with the EEOC?</p> <p>19 MS. MESSICK: Object to the form.</p> <p>20 Q. (By Ms. Sadasivan) The Equal</p> <p>21 Employment Opportunity Commission.</p> <p>22 MS. MESSICK: Object to the form.</p> <p>23 THE WITNESS: I can't speak for</p> <p>24 all, of course. But based upon evaluation of</p> <p>25 information, sometimes we suggest that they</p>	<p>1 question again to make sure I answered your</p> <p>2 question?</p> <p>3 Q. Yeah. I'm asking whether black</p> <p>4 people tend to vote for the black candidate if</p> <p>5 they have --</p> <p>6 A. For the black candidate?</p> <p>7 MS. MESSICK: Object to the form.</p> <p>8 THE WITNESS: I would say yes.</p> <p>9 Q. (By Ms. Sadasivan) Okay. And why</p> <p>10 do you say yes?</p> <p>11 A. Based upon polling numbers and</p> <p>12 exit interview numbers that I have seen,</p> <p>13 black people tend to vote for black</p> <p>14 candidates.</p> <p>15 Q. And in your experience, why do</p> <p>16 black people tend to vote for the black</p> <p>17 candidate?</p> <p>18 MS. MESSICK: Object to the form.</p> <p>19 THE WITNESS: In my experience,</p> <p>20 normally the black candidate comes from the</p> <p>21 same community that the people who vote for</p> <p>22 him. And he has established or they have</p> <p>23 established a relationship with that</p> <p>24 community, and they ask for their vote. You</p> <p>25 know, it's a simple matter of, you know,</p>

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<p style="text-align: right;">Page 117</p> <p>1 offering representation and then also asking 2 for their vote.</p> <p>3 Q. (By Ms. Sadasivan) All right. 4 Is there anything else that you 5 intend to testify at trial in this case about 6 that we haven't discussed?</p> <p>7 MS. MESSICK: Object to the form. 8 THE WITNESS: No.</p> <p>9 MS. SADASIVAN: I'm going to just 10 take a five-minute break, if that's okay with 11 you-all. And I'm joined by my colleague, 12 Jyoti, for the Caster plaintiffs. And I want 13 to make sure that she also has time to ask 14 questions. I'm just going to take a 15 five-minute break if that's all right.</p> <p>16 MS. MESSICK: Could we actually 17 make it ten minutes?</p> <p>18 MS. SADASIVAN: Sure.</p> <p>19 MS. MESSICK: Thank you.</p> <p>20 MS. SADASIVAN: So we can come 21 back then at 1250 -- oh, no, it will be 1:05 22 then.</p> <p>23 MS. MESSICK: Thank you. 24 (A short break was taken.) 25 MS. SADASIVAN: Okay. I don't any</p>	<p style="text-align: right;">Page 119</p> <p>1 Kathryn, this is for you. The other usual 2 stipulations that would apply to this 3 deposition, if you agree to it, would be an 4 agreement that the court reporter does not 5 need to file the transcript with the Court.</p> <p>6 MS. SADASIVAN: Yes, I agree to 7 that.</p> <p>8 Q. (By Ms. Messick) Mr. Turner, you 9 mentioned earlier that the hours at the career 10 centers are set at headquarters in Montgomery; 11 is that right?</p> <p>12 A. That's correct.</p> <p>13 MS. SADASIVAN: Objection to form.</p> <p>14 Q. (By Ms. Messick) And the hours, 15 you said I believe, that the suggestions of 16 the managers of those career centers are taken 17 into account?</p> <p>18 A. Yes.</p> <p>19 Q. And you said that one of the 20 persons who makes that decision is the 21 secretary of labor; is that right?</p> <p>22 A. That's correct.</p> <p>23 Q. And who is the secretary of labor?</p> <p>24 A. Fitzgerald Washington.</p> <p>25 Q. Do you know what race he is?</p>
<p style="text-align: right;">Page 118</p> <p>1 further questions for you at this time, 2 Mr. Turner. I really appreciate you taking 3 the time to speak with us today. I'm passing 4 to my colleague, Jyoti, who may or may not 5 have any additional questions.</p> <p>6 MS. JASRASARIA: Hi, Mr. Turner. 7 Thanks so much for your time today. No 8 further questions from the Caster plaintiffs.</p> <p>9 EXAMINATION BY MS. MESSICK:</p> <p>10 Q. Mr. Turner, I do have just a few 11 questions for you if you don't mind.</p> <p>12 As you have been answering 13 plaintiff's questions here today, have you 14 answered to the best of your ability based on 15 your recollection as you sit here today?</p> <p>16 A. Yes, I have.</p> <p>17 Q. Is it possible that there may have 18 been another conversation that you had with me 19 that you don't remember at this time?</p> <p>20 A. Yes, it's possible.</p> <p>21 Q. Okay. If you are called upon to 22 testify at trial, will you answer whatever 23 questions we put to you?</p> <p>24 A. Absolutely.</p> <p>25 MS. MESSICK: And actually,</p>	<p style="text-align: right;">Page 120</p> <p>1 A. Yes.</p> <p>2 Q. And what race is he?</p> <p>3 A. He's black.</p> <p>4 Q. Do you know how he -- do you know 5 how he was hired to be secretary of labor?</p> <p>6 MS. SADASIVAN: Objection. I'm 7 sorry. I'm objecting to form. I can't really 8 hear totally when you're done speaking, 9 Ms. Messick. You have a very light voice, I 10 apologize.</p> <p>11 MS. MESSICK: Sorry.</p> <p>12 Q. Do you know how Secretary 13 Washington came to be hired for the position 14 he's in?</p> <p>15 A. Yes, I do.</p> <p>16 Q. And what can you tell me about 17 that?</p> <p>18 A. He was appointed by the 19 governor.</p> <p>20 Q. Do you know which governor?</p> <p>21 A. Yes.</p> <p>22 Q. Which governor?</p> <p>23 A. Bentley.</p> <p>24 Q. Who is the other person who is 25 involved in that decision about the career</p>

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1 center hours at headquarters?
2 A. It would be the director of
3 employment service.
4 Q. And who is that person?
5 A. Currently we have an acting
6 director, and his name the Kevin Kidd. The
7 director retired. So he's in his position
8 acting at this time.
9 Q. Okay. Thank you.
10 I think there was a little bit of
11 crosstalk, and I want to make sure the record
12 is clear.
13 You said, if I understood you
14 right, that you think of discrimination in
15 terms of denial of access; is that correct?
16 A. Correct.
17 Q. And the examples you gave were
18 being denied access to a restaurant and a golf
19 course; correct?
20 A. Correct.
21 Q. Did you hold any title at the
22 Department of Labor between when you became a
23 manager and when you became a senior manager?
24 A. Oh, I'm sorry. Ask the question
25 again.

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1 Q. You testified earlier that you had
2 begun your employment with the Department of
3 Industrial Relations as an employment security
4 representative?
5 A. Correct.
6 Q. And at some point, the Department
7 of Industrial Relations became the Department
8 of Labor?
9 A. Correct.
10 Q. And at some point, you were
11 promoted to a manager position?
12 A. That's correct.
13 Q. And I know that you are currently
14 a senior manager. And so my question was:
15 Was there any job between manager and senior
16 manager?
17 A. No, there was not.
18 Q. Okay. Thank you.
19 The Greenville Career Center, did
20 you go there only for training, or did you
21 also work there?
22 A. Just for training.
23 Q. Okay. And the Selma Career
24 Center, did you only work there, or did you
25 also get training there?

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1 A. I only worked there.
2 Q. The Bay Minette Career Center, did
3 you only work there, or did you also get
4 training there?
5 A. We did primarily training, but
6 I've also worked there.
7 Q. The Foley Career Center, have you
8 received any training there?
9 A. Yes, I have.
10 Q. And have you received any training
11 at the Jackson Career Center?
12 A. Yes, I have.
13 Q. As you sit here today, can you
14 think of any other career centers other than
15 the ones we just discussed and the Mobile
16 Career Center where you have received
17 training?
18 A. The Montgomery Career Center.
19 And I think I have also been to training at
20 the Monroeville Career Center.
21 Q. Thank you.
22 I am dropping into the chat a
23 document labeled Bates No. SOS155584. And I
24 would ask the court reporter to mark this as
25 Defendant's Exhibit 1.

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1 (Whereupon, Defendant's
2 Exhibit 1 was marked for
3 identification.)
4 MS. MESSICK: Okay. The witness
5 is with me. I know he can see my screen.
6 Kathryn, can you see what I'm showing you?
7 MS. SADASIVAN: I'm looking at the
8 PDF, so I can scroll the document, yes.
9 Q. (By Ms. Messick) Okay.
10 Mr. Turner, do you recognize this
11 document?
12 A. Yes, I do.
13 Q. Can you tell me what it is?
14 A. That is a map that describes the
15 seven districts -- I'm sorry. The seven
16 regions that's across the state of Alabama.
17 Q. Do you see any date on this map?
18 A. Yes, I do.
19 Q. And what is the date on the map?
20 A. August the -- I'm sorry. April
21 the 11th, 2024.
22 Q. Do you know if this map is current
23 today?
24 A. Yes, that is correct.
25 Q. Do you see underneath the state of

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<p style="text-align: right;">Page 125</p> <p>1 Alabama, there's a reference -- the map key</p> <p>2 talks about comprehensive career centers,</p> <p>3 affiliate career centers, satellite career</p> <p>4 centers, and itinerant career centers?</p> <p>5 A. Yes.</p> <p>6 Q. Okay. And the Mobile Career</p> <p>7 Center that you work at, that's a</p> <p>8 comprehensive career center?</p> <p>9 A. That is correct.</p> <p>10 Q. Okay. If you know, can you tell</p> <p>11 me the difference between -- what makes a</p> <p>12 career center an affiliate or a satellite or</p> <p>13 an itinerant?</p> <p>14 A. Yes, I can. The comprehensive</p> <p>15 center is made up of the four mandated</p> <p>16 partners under the WIOA Act.</p> <p>17 So there are four partners; your</p> <p>18 education partner, your employment service</p> <p>19 partner, your adult rehabilitation partner,</p> <p>20 and your -- employment service, education,</p> <p>21 adult education, and rehab. Those are the</p> <p>22 four partners that make up a comprehensive</p> <p>23 career center.</p> <p>24 Q. Now, earlier haven't you mentioned</p> <p>25 veterans services?</p>	<p style="text-align: right;">Page 127</p> <p>1 career center services to clients that come</p> <p>2 to that facility because there may not be an</p> <p>3 affiliate or comprehensive site close.</p> <p>4 Q. Thank you.</p> <p>5 When you talked -- I want to go</p> <p>6 back to the earlier discussion about the hours</p> <p>7 of the career centers.</p> <p>8 A. Uh-huh.</p> <p>9 Q. Do you have any facts to suggest</p> <p>10 that the hours that are selected for a career</p> <p>11 center are selected for any reason based on</p> <p>12 race?</p> <p>13 A. No.</p> <p>14 Q. Thank you.</p> <p>15 You said earlier, if I understood</p> <p>16 you right, that you believe that employment</p> <p>17 services are equally needed in all</p> <p>18 communities, but there's a lot of emphasis on</p> <p>19 the black communities. Did I get that right?</p> <p>20 A. That's correct.</p> <p>21 Q. Who is putting emphasis on the</p> <p>22 black communities? Are you saying the</p> <p>23 Department of Labor is or somebody else?</p> <p>24 MS. SADASIVAN: Objection to form.</p> <p>25 THE WITNESS: The way I would</p>
<p style="text-align: right;">Page 126</p> <p>1 A. That's contained within</p> <p>2 employment service. Veterans services is</p> <p>3 part of employment services. So they're</p> <p>4 within.</p> <p>5 Q. Okay. And I'm sorry. Could you</p> <p>6 go back to answering my question about the</p> <p>7 different kinds of career centers?</p> <p>8 A. Okay. The affiliate career</p> <p>9 center are offices that will hold -- house</p> <p>10 the employment service and the WIOA education</p> <p>11 and training component. But they may not</p> <p>12 necessarily have the other partners within</p> <p>13 that facility such as adult education or</p> <p>14 rehabilitation.</p> <p>15 The satellite sites, again, are</p> <p>16 sites where we have partnered with another</p> <p>17 established body, and we go in part-time and</p> <p>18 man those facilities.</p> <p>19 And the itinerant sites are very</p> <p>20 similar as the satellite sites where we go</p> <p>21 into another body and provide services within</p> <p>22 that body as if we were a career center</p> <p>23 within -- for example, a two-year college</p> <p>24 let's just say, Coastal in Thomasville, we</p> <p>25 may set up an office at Coastal to provide</p>	<p style="text-align: right;">Page 128</p> <p>1 answer that question is, I think it is the</p> <p>2 Department's goal to strengthen employment in</p> <p>3 the black community. And, I mean, it just</p> <p>4 happens out statistically that the black</p> <p>5 community needs more retraining and support</p> <p>6 from the department. So I think that's why</p> <p>7 there's an emphasis, you know, on black</p> <p>8 employment. Does that answer your question?</p> <p>9 Q. (By Ms. Messick) What do you mean</p> <p>10 when you say that it works out statistically</p> <p>11 that the black community needs more</p> <p>12 assistance?</p> <p>13 A. Because proportionately there</p> <p>14 are more black people out of work.</p> <p>15 Proportionately black people will need more</p> <p>16 help finding work.</p> <p>17 Q. So, as a proportion, the black</p> <p>18 community, it's your testimony that a member</p> <p>19 of the black community is basically more</p> <p>20 likely to be out of work and need your</p> <p>21 assistance than a member of the white</p> <p>22 community?</p> <p>23 A. I would say yes.</p> <p>24 Q. Okay. Thank you.</p> <p>25 I'm going to show you Defendant's</p>

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<p style="text-align: right;">Page 129</p> <p>1 Exhibit 1 again. I believe you testified 2 earlier that people from other parts -- 3 citizens from other parts of Region 7 do come 4 to Mobile for jobs like in the shipping 5 industry; is that right? 6 A. That's correct. 7 Q. Do you know if people outside of 8 Region 7 come to Mobile for shipping jobs? 9 A. Yes. 10 Q. Do they? 11 A. Yes. 12 Q. Do you know if people outside of 13 Region 7 come to Mobile for other kinds of 14 jobs or jobs in other industries? 15 A. Can you be more -- can you be a 16 little more specific? Are we talking the 17 shipping industry, or are we talking about 18 the industries that I named? 19 Q. What I'm trying to get at is 20 actually, are you aware of whether anybody 21 living in a different Department of Labor 22 region than Region 7 comes to Mobile for any 23 kind of employment? 24 A. I would say I don't have direct 25 knowledge of that. But just over my career,</p>	<p style="text-align: right;">Page 131</p> <p>1 have questions for you. 2 MS. SADASIVAN: I don't. Thank 3 you so much, Mr. Turner. I do genuinely 4 appreciate your time. Sorry for having you 5 come all the way to Montgomery. But it was a 6 pleasure to speak with you today. Thanks so 7 much. 8 THE WITNESS: All right. 9 MS. JASRASARIA: No questions from 10 the Caster plaintiffs. Thank you, again. 11 MS. MESSICK: Thank you. 12 (The deposition concluded at 1:28 p.m.) 13 14 15 16 17 18 19 20 21 22 23 24 25</p>
<p style="text-align: right;">Page 130</p> <p>1 people have moved to Mobile to participate in 2 the industry that we have in Mobile from 3 other parts of the state. 4 Q. Okay. As you sit here today, do 5 you remember any other parts of the state that 6 they came from? 7 A. Yes. We've had people move 8 from, you know, of course the Birmingham 9 area, the -- Enterprise is one of the ones, 10 and the Dothan area. I can give a specific 11 example of Enterprise and Dothan because the 12 military base in that area, there are a 13 lot -- there's a lot of aircraft industry. A 14 lot of those people from that area have moved 15 to Mobile to take advantage of the aviation 16 industry that's growing in Mobile. That's a 17 specific example. 18 Q. And I'm sorry. Did you say how 19 many people? 20 A. I did not. 21 Q. Okay. Do you know how many 22 people? 23 A. No. 24 MS. MESSICK: Okay. I don't have 25 any further questions. Kathryn or Jyoti might</p>	<p style="text-align: right;">Page 132</p> <p>1 C E R T I F I C A T E 2 3 STATE OF ALABAMA) 4 COUNTY OF ST. CLAIR) 5 6 I hereby certify that the foregoing 7 transcript was taken down, as stated in the 8 caption, and the questions and answers thereto 9 were reduced to typewriting under my 10 direction, that the foregoing pages represent 11 a true, complete, and correct transcript of 12 the evidence given upon said hearing. 13 I further certify that I am not of kin or 14 counsel to the parties in the case; am not in 15 the regular employ of counsel for any of said 16 parties, nor am I in any way financially 17 interested in the result of said case. 18 19 <i>Cindy C. Jenkins</i> 20 Cindy C. Jenkins 21 Certified Court Reporter, 470 22 23 24 25</p>

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4 I declare under penalty of perjury that	4 Reason for change: _____
5 I have read the entire transcript of	5 Page No. _____ Line No. _____ Change to: _____
6 my Deposition taken in the captioned matter	6 _____
7 or the same has been read to me, and	7 Reason for change: _____
8 the same is true and accurate, save and	8 Page No. _____ Line No. _____ Change to: _____
9 except for changes and/or corrections, if	9 _____
10 any, as indicated by me on the DEPOSITION	10 Reason for change: _____
11 ERRATA SHEET hereof, with the understanding	11 Page No. _____ Line No. _____ Change to: _____
12 that I offer these changes as if still under	12 _____
13 oath.	13 Reason for change: _____
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