

1 IN THE UNITED STATES DISTRICT COURT FOR
2 THE NORTHERN DISTRICT OF ALABAMA
3 SOUTHERN DIVISION
4

5 CASE NUMBER: 2:21-cv-1291-AMM
6

7 BOBBY SINGLETON, et al.,
8 Plaintiffs,
9 vs.

10 WES ALLEN, in his official
11 capacity as Alabama
12 Secretary of State, et al.,
13 Defendants.
14

15 CASE NUMBER: 2:21-cv-01530-AMM
16

17 EVAN MILLIGAN, et al.,
18 Plaintiffs,
19 vs.

20 WES ALLEN, in his official
21 capacity as Secretary of
22 State of Alabama, et al.,
23 Defendants.
24
25

<p style="text-align: right;">Page 2</p> <p>1 CASE NUMBER: 2:21-cv-01536-AMM</p> <p>2</p> <p>3 MARCUS CASTER, et al.,</p> <p>4 Plaintiffs,</p> <p>5 vs.</p> <p>6 WES ALLEN, in his official</p> <p>7 Capacity as Alabama</p> <p>8 Secretary of State, et al.,</p> <p>9 Defendants.</p> <p>10 S T I P U L A T I O N</p> <p>11 IT IS STIPULATED AND AGREED,</p> <p>12 by and between the parties through their</p> <p>13 respective counsel, that the deposition of</p> <p>14 MANASSEH POWELL may be taken before Michelle</p> <p>15 L. Parvin, Commissioner, at the Alabama</p> <p>16 Attorney General's Office, 501 Washington</p> <p>17 Avenue, Montgomery, Alabama, 36104, on the</p> <p>18 25th day of July, 2024.</p> <p>19 IT IS FURTHER STIPULATED AND</p> <p>20 AGREED that it shall not be necessary for any</p> <p>21 objections to be made by counsel to any</p> <p>22 questions, except as to form or leading</p> <p>23 questions, and that counsel for the parties</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 4</p> <p>1 I N D E X</p> <p>2</p> <p>3 EXAMINATION BY: PAGE NUMBER:</p> <p>4 Ms. Messick 9</p> <p>5</p> <p>6 DEFENDANT'S EXHIBITS:</p> <p>7 Exhibit 1 40</p> <p>8 Complaint For Declaratory and</p> <p>9 Injunctive Relief</p> <p>10 Exhibit 2 41</p> <p>11 First Amended Complaint For Declaratory</p> <p>12 and Injunctive Relief</p> <p>13 Exhibit 3 49</p> <p>14 Map of counties in Alabama</p> <p>15 Exhibit 4 51</p> <p>16 2021 Plan (Legislature)</p> <p>17 Exhibit 5 58</p> <p>18 2023 Plan (Legislature)</p> <p>19 Exhibit 6 73</p> <p>20 Injunction, Order and Court-Ordered</p> <p>21 Remedial Map</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 3</p> <p>1 may make objections and assign grounds at the</p> <p>2 time of trial, or at the time said deposition</p> <p>3 is offered in evidence, or prior thereto.</p> <p>4 IT IS FURTHER STIPULATED AND</p> <p>5 AGREED that notice of filing of the</p> <p>6 deposition by the Commissioner is waived.</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</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 5</p> <p>1 IN THE UNITED STATES DISTRICT COURT FOR</p> <p>2 THE NORTHERN DISTRICT OF ALABAMA</p> <p>3 SOUTHERN DIVISION</p> <p>4</p> <p>5 CASE NUMBER: 2:21-cv-1291-AMM</p> <p>6</p> <p>7 BOBBY SINGLETON, et al.,</p> <p>8 Plaintiffs,</p> <p>9 vs.</p> <p>10 WES ALLEN, in his official</p> <p>11 capacity as Alabama</p> <p>12 Secretary of State, et al.,</p> <p>13 Defendants.</p> <p>14</p> <p>15 CASE NUMBER: 2:21-cv-01530-AMM</p> <p>16</p> <p>17 EVAN MILLIGAN, et al.,</p> <p>18 Plaintiffs,</p> <p>19 vs.</p> <p>20 WES ALLEN, in his official</p> <p>21 capacity as Secretary of</p> <p>22 State of Alabama, et al.,</p> <p>23 Defendants.</p> <p>24</p> <p>25</p>

<p style="text-align: right;">Page 6</p> <p>1 CASE NUMBER: 2:21-cv-01536-AMM</p> <p>2</p> <p>3 MARCUS CASTER, et al.,</p> <p>4 Plaintiffs,</p> <p>5 vs.</p> <p>6 WES ALLEN, in his official</p> <p>7 Capacity as Alabama</p> <p>8 Secretary of State, et al.,</p> <p>9 Defendants.</p> <p>10</p> <p>11 BEFORE:</p> <p>12 Michelle L. Parvin, Certified</p> <p>13 Court Reporter</p> <p>14 APPEARANCES:</p> <p>15 ELIAS LAW GROUP by Ms. Jyoti</p> <p>16 Jasrasaria, 250 Massachusetts Avenue NW,</p> <p>17 Suite 400, Washington, DC, 20001, appearing</p> <p>18 on behalf of the Plaintiffs.</p> <p>19 OFFICE OF THE ATTORNEY GENERAL,</p> <p>20 STATE OF ALABAMA by Ms. Misty S. Fairbanks</p> <p>21 and Mr. Richard D. Mink, 501 Washington</p> <p>22 Avenue, Montgomery, Alabama, 36104, appearing</p> <p>23 on behalf of Defendant Secretary Wes Allen.</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 8</p> <p>1 I, Michelle L. Parvin, a Court</p> <p>2 Reporter of Birmingham, Alabama, acting as</p> <p>3 Commissioner, certify that on this date, as</p> <p>4 provided by the Federal Rules of Civil</p> <p>5 Procedure of the United States District</p> <p>6 Court, and the foregoing stipulation of</p> <p>7 counsel, there came before me at 501</p> <p>8 Washington Avenue, Montgomery, Alabama,</p> <p>9 36104, beginning at 9:13 a.m., MANASSEH</p> <p>10 POWELL, witness in the above cause, for oral</p> <p>11 examination, whereupon the following</p> <p>12 proceedings were had:</p> <p>13</p> <p>14 MANASSEH POWELL,</p> <p>15 being first duly sworn, was examined and</p> <p>16 testified as follows:</p> <p>17</p> <p>18 THE COURT REPORTER: Okay. Usual</p> <p>19 stipulations?</p> <p>20 MS. MESSICK: Yes, please. But</p> <p>21 the witness may want to read and sign.</p> <p>22 MS. JASRASARIA: Yes. So, this</p> <p>23 just means that you'll get a chance to read</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 7</p> <p>1 BALCH & BINGHAM, LLP, by Mr.</p> <p>2 Dorman Walker, 445 Dexter Avenue, Montgomery,</p> <p>3 Alabama, 36101, appearing on behalf of</p> <p>4 Defendants Representative Chris Pringle and</p> <p>5 Senator Steven Livingston.</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</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 9</p> <p>1 the transcript and sign it. So, we would</p> <p>2 like to preserve that right.</p> <p>3 MS. MESSICK: Great.</p> <p>4</p> <p>5 EXAMINATION BY MS. MESSICK:</p> <p>6</p> <p>7 Q. Good morning.</p> <p>8 A. Good morning.</p> <p>9 Q. My name is Misty S. Fairbanks</p> <p>10 Messick, and I represent the Secretary of</p> <p>11 State, Wes Allen, in the congressional</p> <p>12 redistricting lawsuit that you have filed.</p> <p>13 Mr. Dorman Walker at the end of the table</p> <p>14 represents Senator Livingston and</p> <p>15 Representative Pringle, who you've also sued.</p> <p>16 And Mr. Mink in between us works with me</p> <p>17 representing the Secretary of State.</p> <p>18 This deposition is an opportunity</p> <p>19 for us to understand the testimony in this</p> <p>20 matter. There's a court reporter here. And</p> <p>21 she is going to be taking down everything</p> <p>22 that you say. And you understand that you</p> <p>23 are answering questions under oath, correct?</p> <p>24</p> <p>25</p>

<p style="text-align: right;">Page 10</p> <p>1 A. Uh-huh.</p> <p>2 Q. Okay. Because we need the court</p> <p>3 reporter to accurately transcribe everything</p> <p>4 that we say today, we have a few rules for</p> <p>5 this conversation that are different from</p> <p>6 everyday conversations. First of all, when</p> <p>7 people are just interacting, it's really easy</p> <p>8 to talk over each other sometimes. That</p> <p>9 makes it really hard on the court reporter to</p> <p>10 accurately transcribe what has been said.</p> <p>11 So, I will do my best to wait for you to</p> <p>12 finish giving an answer before I ask another</p> <p>13 question, and I'll ask you to hear my entire</p> <p>14 question, wait for me to finish before you</p> <p>15 start answering. I'll tell you that's also</p> <p>16 to your advantage because sometimes the</p> <p>17 witness thinks they know where the lawyer's</p> <p>18 going, and they answer a different question</p> <p>19 than the lawyer was going to ask. It may be</p> <p>20 a better one than the lawyer was going to</p> <p>21 ask. So, you're creating an extra question</p> <p>22 for yourself.</p> <p>23 It's also important to speak your</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 12</p> <p>1 know that. When you leave here today, I want</p> <p>2 to have the best answers that you can give me</p> <p>3 today as -- you know, you may not remember</p> <p>4 everything I ask, but what you do know, what</p> <p>5 you do remember, I want to have your best,</p> <p>6 most accurate testimony by the time you leave</p> <p>7 even if it means going back to something.</p> <p>8 Your counsel may object from time</p> <p>9 to time. Normally, that's an objection to</p> <p>10 the form. She doesn't like something about</p> <p>11 my question. If that's the case, you can</p> <p>12 still answer the question. Sometimes I might</p> <p>13 say, hey, she's right, and rephrase the</p> <p>14 question. But you should plan on answering</p> <p>15 every question I ask unless you're instructed</p> <p>16 not to answer.</p> <p>17 A. Okay.</p> <p>18 Q. We will occasionally take breaks.</p> <p>19 If you need a break, feel free to ask for</p> <p>20 one. But I will ask you to answer whatever</p> <p>21 question that I have on the table before we</p> <p>22 take a break. And sometimes I might want to</p> <p>23 get a couple more questions in to finish up a</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 11</p> <p>1 answers. It's fine if you want to shake your</p> <p>2 head and use your hands, too, but it is</p> <p>3 important that you speak so that the court</p> <p>4 reporter can reliably get your answers down.</p> <p>5 A. Okay.</p> <p>6 Q. If you do not understand a</p> <p>7 question, please let me know. I'm happy to</p> <p>8 rephrase it. You can also ask the court</p> <p>9 reporter to read it back. But I want you to</p> <p>10 understand what I'm asking.</p> <p>11 A. Okay.</p> <p>12 Q. And if you don't hear a question</p> <p>13 for any reason, you can ask me to repeat it</p> <p>14 or have her read it back.</p> <p>15 Sometimes during the course of a</p> <p>16 deposition, a witness will give an answer,</p> <p>17 and then, later, while we're still here,</p> <p>18 they'll realize, oh, that was wrong, or she</p> <p>19 asked me for a list, and I only thought of</p> <p>20 three things, but I've thought of two more.</p> <p>21 If you need to go back to refine or change</p> <p>22 any of your answers while we're here today,</p> <p>23 please let me know that or let your lawyer</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 13</p> <p>1 topic area. But I'll try and give you a</p> <p>2 break quickly after you ask for one.</p> <p>3 Is there any reason, including</p> <p>4 medical conditions or medication that you're</p> <p>5 not able to completely and truthfully answer</p> <p>6 my questions here today?</p> <p>7 A. No, it's not.</p> <p>8 Q. Okay. Do you have any questions</p> <p>9 about the process before we get started?</p> <p>10 A. No, I don't. Attorney Jyoti has</p> <p>11 referred to me a pretty good idea as to what</p> <p>12 we're doing.</p> <p>13 Q. Excellent. Would you please</p> <p>14 state your name for the record?</p> <p>15 A. Manasseh Powell.</p> <p>16 Q. And have you ever been involved</p> <p>17 in litigation before the current lawsuit that</p> <p>18 we're here about today?</p> <p>19 A. No, I haven't.</p> <p>20 Q. Have you ever been deposed before</p> <p>21 today?</p> <p>22 A. No, I haven't.</p> <p>23 Q. And have you ever testified in</p> <p>24</p> <p>25</p>

<p style="text-align: right;">Page 14</p> <p>1 court?</p> <p>2 A. I have.</p> <p>3 Q. When did you testify in court?</p> <p>4 A. That's going to go back to 20 --</p> <p>5 if you're talking -- referring to when you</p> <p>6 are summoned for a jury; is that the same</p> <p>7 thing?</p> <p>8 Q. Oh, okay. Let's ignore any jury</p> <p>9 duty.</p> <p>10 A. Okay. So, no, I haven't.</p> <p>11 Q. Okay. Did you end up serving on</p> <p>12 a jury?</p> <p>13 A. I did.</p> <p>14 Q. What kind of case was it?</p> <p>15 A. It was a young man had shot</p> <p>16 someone. And I think they proved that he did</p> <p>17 some time.</p> <p>18 Q. Okay. Do you remember when about</p> <p>19 that was?</p> <p>20 A. About thirty years ago.</p> <p>21 Q. Do you remember if that was in</p> <p>22 state court or federal court?</p> <p>23 A. It was right here in Montgomery.</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 16</p> <p>1 of them that was, I guess, explaining what</p> <p>2 was happening with this case.</p> <p>3 Q. Were those, again, things you</p> <p>4 found on the internet?</p> <p>5 A. These was some journals that was</p> <p>6 given to me, forwarded to me.</p> <p>7 Q. By whom?</p> <p>8 A. Well, it's the young man that</p> <p>9 I -- that actually got me into all of this,</p> <p>10 he's the union president.</p> <p>11 Q. Okay. What's his name?</p> <p>12 A. Wendell. And he gave me some</p> <p>13 info to look over. And --</p> <p>14 Q. Is that Wendell Thomas?</p> <p>15 A. It is.</p> <p>16 Q. Okay.</p> <p>17 A. So, you know Wendell?</p> <p>18 Q. If he's --</p> <p>19 A. Oh, he's one of -- he's one of</p> <p>20 the guys that's doing this?</p> <p>21 Q. Yes. He's a plaintiff, also. I</p> <p>22 was going to ask you if you knew him and I</p> <p>23 was going to ask you how you ended up in this</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 15</p> <p>1 Right -- it was state.</p> <p>2 Q. Have you testified under oath</p> <p>3 outside of a court proceeding?</p> <p>4 A. No.</p> <p>5 Q. Okay. What did you do to prepare</p> <p>6 for your deposition today?</p> <p>7 A. Well, I attempted to gather</p> <p>8 information. It referred to this case</p> <p>9 specific as to the redrawing of the district</p> <p>10 and understand maybe a little bit as to</p> <p>11 reasoning behind that idea and read some more</p> <p>12 supporting information that would, you might</p> <p>13 say, solidify my idea of thinking that this</p> <p>14 would be a good thing.</p> <p>15 Q. Were you looking at things on the</p> <p>16 internet?</p> <p>17 A. I was looking at things on the</p> <p>18 internet, yes.</p> <p>19 Q. Did you, in preparation for this</p> <p>20 deposition, read any documents that were</p> <p>21 filed in this case?</p> <p>22 A. I list -- there's some -- there's</p> <p>23 some tapes out there that I listened to some</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 17</p> <p>1 case. So, now, we know those answers.</p> <p>2 So, he forwarded you some</p> <p>3 information that you looked at --</p> <p>4 A. Yeah, this was --</p> <p>5 Q. -- or listened --</p> <p>6 A. This was --</p> <p>7 Q. -- to?</p> <p>8 A. This was -- this was before I</p> <p>9 even joined -- signed the petition, okay?</p> <p>10 So -- and then, in talking with my</p> <p>11 representative, I was -- she gave me some --</p> <p>12 well, not gave me, sent me a text that if I</p> <p>13 wanted to find out some more information, I</p> <p>14 can go -- I can read that info, yeah.</p> <p>15 Q. And who are you referring to when</p> <p>16 you say my representative?</p> <p>17 A. Ms. Jyoti.</p> <p>18 Q. Oh, okay. Conversations between</p> <p>19 you and her are privileged. So, I might ask</p> <p>20 you if you talked to her, when you talked to</p> <p>21 her, how long you talked to her, but I'm not</p> <p>22 going to ask you what you talked to her</p> <p>23 about.</p> <p>24</p> <p>25</p>

<p style="text-align: right;">Page 18</p> <p>1 A. Okay.</p> <p>2 Q. And I might ask you if you looked</p> <p>3 at documents while she was prepping you, but</p> <p>4 I'm not going to ask about those</p> <p>5 conversations. And I would encourage you --</p> <p>6 A. Well, I --</p> <p>7 Q. -- not to offer anything --</p> <p>8 A. Okay.</p> <p>9 Q. -- about them.</p> <p>10 A. I asked whether there -- I asked</p> <p>11 her whether there was some info that she</p> <p>12 could forward me that I can become a little</p> <p>13 bit more knowledgeable as to this case, and</p> <p>14 she just sent me a link to go and said if I</p> <p>15 wanted to find out something about that. So,</p> <p>16 it was on my request, so -- just to clear</p> <p>17 that all up, yeah.</p> <p>18 MS. JASRASARIA: Yeah. And I'll</p> <p>19 just object to -- I'll instruct you not to</p> <p>20 answer additional questions about our</p> <p>21 conversation --</p> <p>22 THE WITNESS: Okay.</p> <p>23 MS. JASRASARIA: -- whether it's</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 20</p> <p>1 putting that out there. Yeah.</p> <p>2 Q. What do you remember looking at</p> <p>3 on the internet about this case?</p> <p>4 A. Well, it's a lot of information,</p> <p>5 but I'll try and make it short. But the</p> <p>6 redrawing of the -- of the district. I think</p> <p>7 the district, at current, I think it's</p> <p>8 somewhere forty-eight point seven percent in</p> <p>9 2. And during the election periods of time,</p> <p>10 most of the time, even though the majority of</p> <p>11 Black people, they don't get their</p> <p>12 representative as a Black representative.</p> <p>13 They get basically the -- yeah. And so, I</p> <p>14 think in redrawing, it will give them almost</p> <p>15 an equal chance of getting the representation</p> <p>16 that -- you know, that the people of those</p> <p>17 areas, issues that they may be concerned</p> <p>18 about would be better represented.</p> <p>19 Q. Does that representative need to</p> <p>20 be Black?</p> <p>21 A. Well, I would say it's the issue</p> <p>22 not necessarily the color, okay?</p> <p>23 Q. Okay.</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 19</p> <p>1 you asking me or me giving you information.</p> <p>2 THE WITNESS: Can you scratch</p> <p>3 that?</p> <p>4 MS. JASRASARIA: No, no.</p> <p>5 THE WITNESS: I'm just joking</p> <p>6 about that.</p> <p>7 MS. JASRASARIA: Everything you</p> <p>8 said is fine.</p> <p>9 Q. (BY MS. MESSICK) Well, and the</p> <p>10 privilege is yours to waive. So, it's your</p> <p>11 decision.</p> <p>12 A. Okay.</p> <p>13 Q. But, obviously --</p> <p>14 A. Okay.</p> <p>15 Q. -- your counsel --</p> <p>16 A. Yeah.</p> <p>17 Q. -- would like you --</p> <p>18 A. All right.</p> <p>19 Q. -- to not tell me --</p> <p>20 A. Thanks for that bit. Thanks for</p> <p>21 that bit.</p> <p>22 Q. -- to not tell me --</p> <p>23 A. Because I was kind of hesitant in</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 21</p> <p>1 A. So, if that representative was of</p> <p>2 color is concerned with the issues of that</p> <p>3 district, then, no, it don't.</p> <p>4 Q. Does that representative need to</p> <p>5 be a Democrat?</p> <p>6 A. Well, it -- I think it's a</p> <p>7 Democratic district. So, it should be.</p> <p>8 Q. Do you remember anything else</p> <p>9 that you've read about your case on the</p> <p>10 internet?</p> <p>11 A. It's a lots of -- a lot of</p> <p>12 history, you know, even parties that go back.</p> <p>13 So, I'll just answer your question if you</p> <p>14 don't mind instead of me just trying to tell</p> <p>15 you what all I read because only a small</p> <p>16 percent of it was retained. And so, I would,</p> <p>17 you know --</p> <p>18 Q. Okay. I assume that you spoke</p> <p>19 with your lawyer in preparation for this</p> <p>20 deposition. Was anybody else present for</p> <p>21 that conversation?</p> <p>22 A. No.</p> <p>23 Q. Okay. Did you talk to anybody</p> <p>24</p> <p>25</p>

<p style="text-align: right;">Page 22</p> <p>1 other than your lawyers about this 2 deposition?</p> <p>3 A. You know, I didn't. In fact, 4 when I get back, I'm going to talk to one 5 because we talked. And he never did let on 6 that he was one of the representatives for 7 this, okay?</p> <p>8 Q. Okay.</p> <p>9 A. Because I mentioned to him, what 10 you got me into, man. And he was, you 11 know -- so, no, I haven't.</p> <p>12 Q. Okay. What do you remember about 13 your conversations about this litigation with 14 Wendell Thomas, the conversations you had 15 with him about this litigation?</p> <p>16 MS. JASRASARIA: And I will just 17 object on common interest privilege that -- 18 I'm instructing you not to answer 19 about any conversations you had with Mr. 20 Thomas after the litigation was filed. But 21 if you recall conversations you had before 22 this litigation was filed, you're welcome to 23 answer those. 24 25</p>	<p style="text-align: right;">Page 24</p> <p>1 come here and do this. And I just talked to 2 him yesterday.</p> <p>3 Q. (BY MS. MESSICK) Okay. You have 4 mentioned a petition a couple of times and 5 you've mentioned signing a petition. And 6 normally when I think of signing a petition, 7 I think of, you know, Dear, Mr. President, we 8 want you to adopt this policy. Are you 9 talking about that thing?</p> <p>10 A. No.</p> <p>11 Q. Or you're saying --</p> <p>12 A. No.</p> <p>13 Q. -- kind of signing on to this 14 whole case?</p> <p>15 A. I think they was trying to get at 16 least three, four hundred, as many people it 17 was on a list of paper. I was just a name 18 that's saying, I guess, to go through and as 19 support in this effort. No, this wasn't 20 going -- I think this was just something to 21 have this presented in court as it is. It 22 just said, hey, you've got three, four 23 hundred thousand people here signed the -- I 24 25</p>
<p style="text-align: right;">Page 23</p> <p>1 A. I didn't have any conversations 2 before --</p> <p>3 MS. MESSICK: I'm sorry. Hold 4 on.</p> <p>5 Are you thinking that a privilege 6 applies even if no lawyer was there or are 7 you limiting -- is your instruction limited 8 to if there was a lawyer there?</p> <p>9 MS. JASRASARIA: So, certainly, 10 if any conversations you're thinking of were 11 with Mr. Thomas and the legal team, then, 12 those are privileged. Any conversations that 13 you had with him separately, you can -- you 14 can discuss.</p> <p>15 A. Well, like I was telling you, we 16 haven't talked that much. The only 17 conversations that we had with this matter is 18 that in him getting me to sign the petition, 19 okay? We haven't discussed the case or -- 20 prior to that -- after -- well, after that, 21 we haven't discussed anything. That's what 22 I'm telling you. I didn't even know he was 23 one of the persons that had been summoned to 24 25</p>	<p style="text-align: right;">Page 25</p> <p>1 called it a petition. What would you call 2 it? What would you call it?</p> <p>3 Q. Okay. That's helpful. Thank 4 you.</p> <p>5 How do you know Mr. Thomas?</p> <p>6 A. Union 9504. I worked at Maxwell 7 Air Force Base. I'm one of the -- I'm the -- 8 I'm the rapid response person. And Wendell 9 is the president of the union. So, we have 10 meetings each month and discuss union issues 11 and things, bargaining agreements and stuff 12 like that.</p> <p>13 Q. Okay. What do you mean when you 14 say you're the rapid response person?</p> <p>15 A. If those are issues or something 16 that we need -- that they're asking for in DC 17 to get support on certain decision they're 18 going to make, so we -- that comes down from 19 the union districts to get support to sign a 20 petition, get our people to sign petition so 21 they can get these names in front of the 22 representative to say, hey, we have a lot of 23 people concerned about the decisions that 24 25</p>

<p style="text-align: right;">Page 26</p> <p>1 you're going to make on certain policies or</p> <p>2 rules and things of that nature.</p> <p>3 Q. So, rapid response has something</p> <p>4 to do with the union; that's not your day job</p> <p>5 at Maxwell?</p> <p>6 A. Oh, no, no, no.</p> <p>7 Q. Okay.</p> <p>8 A. That's just -- that's -- no.</p> <p>9 Q. Okay.</p> <p>10 A. No, it's not.</p> <p>11 Q. Well, like, I think we have a</p> <p>12 rapid response team for riots at prisons.</p> <p>13 So, I thought you were --</p> <p>14 A. Oh, no, no --</p> <p>15 Q. -- talking about --</p> <p>16 A. -- no, no.</p> <p>17 Q. -- that's your --</p> <p>18 A. I don't --</p> <p>19 Q. -- job duty.</p> <p>20 A. I'm not one of their SWAT people</p> <p>21 put up and go.</p> <p>22 Q. Okay. Well, we'll come back to</p> <p>23 what your day job actually is.</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 28</p> <p>1 Q. That's over off Vaughn Road?</p> <p>2 A. No, that's out in Dalraida off of</p> <p>3 Wares Ferry.</p> <p>4 Q. Oh, okay. Is that your only</p> <p>5 residence?</p> <p>6 A. I have another house that my</p> <p>7 mother live in.</p> <p>8 Q. Okay. Which address are you</p> <p>9 registered to vote at?</p> <p>10 A. 558 Grove Park Drive.</p> <p>11 Q. Okay. Are you saying Grove Park</p> <p>12 or Grover?</p> <p>13 A. Grove, G-r-o-v-e.</p> <p>14 Q. Okay. How long have you lived on</p> <p>15 Grove Park Drive?</p> <p>16 A. Twenty-three years.</p> <p>17 Q. Where were you raised?</p> <p>18 A. I was -- I was raised in the</p> <p>19 Lowndes County, Black Belt area till I were</p> <p>20 twelve, and then, we moved here to</p> <p>21 Montgomery.</p> <p>22 Q. Have you lived anywhere else</p> <p>23 besides Lowndes County and Montgomery County?</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 27</p> <p>1 Did you look at any maps in</p> <p>2 preparation for this deposition?</p> <p>3 A. Not enough to be educated on a</p> <p>4 map, but I did look at a couple of maps.</p> <p>5 Q. Do you know which ones you looked</p> <p>6 at? For instance, did you look at the map</p> <p>7 that the court put in place --</p> <p>8 A. Oh, well --</p> <p>9 Q. -- the map that the legislature</p> <p>10 drew?</p> <p>11 A. No, I just looked at the maps</p> <p>12 that -- I think where it's seven districts</p> <p>13 there now, and then, it shows the old and</p> <p>14 what would the new one look like, something</p> <p>15 like that. And that's all.</p> <p>16 Q. And did you bring any documents</p> <p>17 with you here today?</p> <p>18 A. No.</p> <p>19 Q. Okay. What year were you born?</p> <p>20 A. 1955.</p> <p>21 Q. What is your address?</p> <p>22 A. 558 Grove Park Drive, Montgomery,</p> <p>23 Alabama, 36109.</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 29</p> <p>1 A. If you're referring to the</p> <p>2 twenty-eight and a half years I did in the</p> <p>3 military.</p> <p>4 Q. Okay. Which branch were you in?</p> <p>5 A. Four years army, twenty-four and</p> <p>6 a half in the Air Force. Or Air National</p> <p>7 Guard, active Air National Guard.</p> <p>8 Q. So, when you were doing the Air</p> <p>9 National Guard, were you still living in</p> <p>10 Montgomery?</p> <p>11 A. I were.</p> <p>12 Q. Okay. Where were you stationed</p> <p>13 for the four years you were in the army?</p> <p>14 A. Trained in Fort Riley, Kansas,</p> <p>15 basic went to Huntsville at the missile</p> <p>16 system for AIT, and then, straight over Korea</p> <p>17 for a year and back -- and took Kansas, Fort</p> <p>18 Riley, Kansas, for the remaining of the four</p> <p>19 years.</p> <p>20 Q. So, Kansas, Huntsville, and</p> <p>21 Korea?</p> <p>22 A. Huh?</p> <p>23 Q. Kansas, Huntsville, and Korea?</p> <p>24</p> <p>25</p>

<p style="text-align: right;">Page 30</p> <p>1 A. That's correct.</p> <p>2 Q. Okay. So, have you lived</p> <p>3 anywhere other than Lowndes County,</p> <p>4 Montgomery, Kansas, Huntsville, and Korea?</p> <p>5 A. Talking about military?</p> <p>6 Q. Any time in your life, have you</p> <p>7 lived --</p> <p>8 A. Yes.</p> <p>9 Q. -- anywhere else?</p> <p>10 A. Three trips to Korea, two to</p> <p>11 Guam, seven to Hawaii, two to Canada.</p> <p>12 Q. And you said trips. Did you</p> <p>13 visit these places or you lived --</p> <p>14 A. Deployment.</p> <p>15 Q. -- in these places?</p> <p>16 Okay.</p> <p>17 A. This is deployment. That's --</p> <p>18 yeah.</p> <p>19 Q. Okay. So, Guam, Hawaii, and</p> <p>20 Canada?</p> <p>21 A. Guam, Hawaii, Canada, Korea.</p> <p>22 Q. Okay.</p> <p>23 A. And it seemed like I'm missing</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 32</p> <p>1 Q. Did you attend college at any</p> <p>2 point?</p> <p>3 A. I have a master's degree.</p> <p>4 Q. All right. Let's start with, do</p> <p>5 you have an associate's degree?</p> <p>6 A. I have an associate's, a BS, and</p> <p>7 a master's.</p> <p>8 Q. What is your associate's in?</p> <p>9 A. Business admin.</p> <p>10 Q. From where?</p> <p>11 A. Troy.</p> <p>12 Q. Troy at which campus?</p> <p>13 A. Here in Montgomery.</p> <p>14 Q. And what is your bachelor's in?</p> <p>15 A. Business management. It's also</p> <p>16 from Troy.</p> <p>17 Q. And what is your master's in?</p> <p>18 A. HR, human resources. It's also</p> <p>19 from Troy.</p> <p>20 Q. Okay. What year did you get your</p> <p>21 master's?</p> <p>22 A. I think it was -- I'm trying to</p> <p>23 remember what the ring have on it. I think</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 31</p> <p>1 one or two but --</p> <p>2 Q. Okay. If you think of them</p> <p>3 later, please let me know.</p> <p>4 A. Uh-huh.</p> <p>5 Q. Did you graduate from high</p> <p>6 school?</p> <p>7 A. Uh-huh.</p> <p>8 Q. Which high school?</p> <p>9 A. Lanier.</p> <p>10 Q. So, Sidney Lanier here --</p> <p>11 A. Sidney Lanier --</p> <p>12 Q. -- in Montgomery?</p> <p>13 A. -- right.</p> <p>14 Uh-huh.</p> <p>15 THE COURT REPORTER: I can only</p> <p>16 get one at a time.</p> <p>17 MS. MESSICK: I'm sorry.</p> <p>18 Q. What year did you graduate?</p> <p>19 A. '74. Fixing to have my fiftieth</p> <p>20 reunion, yeah.</p> <p>21 Q. Comes up quick, doesn't it?</p> <p>22 A. I didn't know too many people,</p> <p>23 but they had our high school pictures on.</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 33</p> <p>1 it's '86, I believe.</p> <p>2 Q. Are you married?</p> <p>3 A. I am.</p> <p>4 Q. How long?</p> <p>5 A. Twenty-three years. Second</p> <p>6 marriage. So, I was married before that.</p> <p>7 Q. Do you have any children?</p> <p>8 A. I have five kids.</p> <p>9 Q. Are any of them adults?</p> <p>10 A. All of them is adult.</p> <p>11 Q. Okay. Can you tell me, do any of</p> <p>12 them live in Alabama?</p> <p>13 A. Two of them live in Alabama.</p> <p>14 Q. Okay. What cities do those two</p> <p>15 live in?</p> <p>16 A. Montgomery.</p> <p>17 Q. Have the other three ever been</p> <p>18 registered to vote in Alabama?</p> <p>19 A. All of them registered to vote.</p> <p>20 Q. In Alabama?</p> <p>21 A. Well, no. Two of -- one -- first</p> <p>22 wife, my son live in Chicago. Junior live in</p> <p>23 Chicago.</p> <p>24</p> <p>25</p>

<p style="text-align: right;">Page 34</p> <p>1 Q. So, he's never lived in 2 Alabama -- 3 A. He never -- 4 Q. -- as an adult? 5 A. Well, he lived here for about 6 two -- not as an adult, no. 7 Q. Okay. The other four have all 8 been registered voters in Alabama? 9 A. No. His sister has never lived 10 in Alabama either. 11 Q. Okay. Have the other three 12 all -- 13 A. And the other -- 14 Q. -- been registered -- 15 A. -- three been registered -- yeah, 16 they all are registered to vote in Alabama. 17 Q. Okay. What is your day job at 18 the Maxwell Air Force Base? 19 A. I am a -- I am the senior 20 munition inspector. 21 Q. What does that entail doing? 22 A. Well, I'll try to make this short 23 for you but training -- military have to stay 24 25</p>	<p style="text-align: right;">Page 36</p> <p>1 A. Maggie Street Missionary Baptist 2 Church. 3 Q. Is that in Montgomery? 4 A. Uh-huh. On Maggie Street over 5 there by the park, in front of Jackson 6 Hospital. 7 Q. Okay. Approximately, how long 8 have you attended there? 9 A. Well, that one, twenty-three 10 years. 11 Q. Do you have a leadership role 12 there? 13 A. I do. 14 Q. And what is that? 15 A. Well, I am the assistant chair 16 over the deacon board and I'm over the 17 benevolent. I am the secretary of the men's 18 choir, and I just -- we just had -- got rid 19 of being over the men's ministry. So, that 20 right there. 21 Q. Are you a member of any civic 22 organizations at this time? 23 A. No. 24 25</p>
<p style="text-align: right;">Page 35</p> <p>1 qualified in firearms and training and stuff 2 of this nature, even the -- so, we are over 3 acquiring the ordinance that they need for 4 training the base and training security 5 forces, pilots, and all that stuff. So, in 6 order for them to get those assets, we have 7 to put in requisitions to get the asset. We 8 maintain and keep the asset safe until they 9 have a need for it. Then, we issue to the 10 people that have authorization to draw those 11 asset to use for their certifications and 12 things of that nature. 13 So, my job is to make sure all 14 that happen and the ordinance we have is 15 safe, form, fit, and function, okay? So, 16 that what a munition inspector job entail, 17 acquiring and maintaining and proper 18 expenditure and that no rounds get in the 19 wrong hands. So, yeah. 20 Q. Okay. Do you regularly attend 21 church? 22 A. I do. 23 Q. Do you mind telling me where? 24 25</p>	<p style="text-align: right;">Page 37</p> <p>1 Q. Have you been a member of any 2 civic organizations in the last ten years? 3 A. No. 4 Q. Do you have social media 5 accounts? 6 A. I have a -- I have a account, but 7 it's not active. I just -- I opened one up. 8 I never -- don't have anything on it. 9 Q. Which social media platform is 10 that? 11 A. Facebook. 12 Q. Is that account public? 13 A. Yeah, because I guess you put my 14 name in there and can pull it up. All you 15 see is a picture and maybe where I went to 16 school at, but I ain't got nothing on it. 17 Q. Okay. So, is there anything on 18 it about this litigation at all? 19 A. No, it ain't got nothing on it. 20 Q. You and Wendell Thomas are not 21 the only plaintiffs in this litigation. Do 22 you know Marcus Caster? 23 A. Marcus who? 24 25</p>

<p style="text-align: right;">Page 38</p> <p>1 Q. Caster.</p> <p>2 A. That name sound familiar. He at</p> <p>3 Maxwell?</p> <p>4 Q. I don't believe so.</p> <p>5 A. No, I don't think I know him.</p> <p>6 Q. Do you know LaKeisha Chestnut?</p> <p>7 A. She sound familiar, but, no, I</p> <p>8 don't know her right offhand.</p> <p>9 Q. Do you know Bobby Lee DuBose?</p> <p>10 A. No.</p> <p>11 Q. Do you know Benjamin Jones?</p> <p>12 A. Benjamin Jones?</p> <p>13 Q. Okay.</p> <p>14 A. No.</p> <p>15 Q. Do you know Rodney Allen Love?</p> <p>16 A. Rodney Allen Love? No.</p> <p>17 Q. Do you know Ronald Smith?</p> <p>18 A. I know a Ronald Smith, but I</p> <p>19 doubt if he would be one of the ones that</p> <p>20 we're talking about.</p> <p>21 Q. Okay. The one I'm talking about</p> <p>22 is in Bullock County.</p> <p>23 A. No.</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 40</p> <p>1 document that I'm marking as Defendant's</p> <p>2 Exhibit 1.</p> <p>3</p> <p>4 (Whereupon, Defendant's Exhibit 1</p> <p>5 was marked for identification and</p> <p>6 copy of same is attached hereto.)</p> <p>7</p> <p>8 Q. (BY MS. MESSICK) And I'll</p> <p>9 represent to you that this is the original</p> <p>10 complaint that you filed in this lawsuit.</p> <p>11 I'd like you to take a minute to look at it</p> <p>12 and tell me if you recognize this document.</p> <p>13 A. That's where I get those names</p> <p>14 from. I think in signing the petition, these</p> <p>15 names was at the top of that. Yeah.</p> <p>16 Q. Okay.</p> <p>17 A. Okay. So --</p> <p>18 Q. So, the question was: Do you</p> <p>19 recognize the document?</p> <p>20 A. Well, I have never seen the</p> <p>21 document, okay?</p> <p>22 Q. Okay.</p> <p>23 MS. MESSICK: Can we go off the</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 39</p> <p>1 Q. Okay. So, you said Wendell</p> <p>2 Thomas talked you into being part of this</p> <p>3 lawsuit. Did --</p> <p>4 A. He talked me into signing this</p> <p>5 petition, okay? And I thought that's all I</p> <p>6 had to do. I didn't know I was going to -- I</p> <p>7 didn't know -- you know, I'm not saying --</p> <p>8 I'm just -- I didn't know --</p> <p>9 Q. Okay.</p> <p>10 A. -- that I was going to be a</p> <p>11 person representing, take off work to come</p> <p>12 and -- you know, I just didn't know that.</p> <p>13 Q. Okay. Well, I appreciate you</p> <p>14 being here.</p> <p>15 Did you encourage anybody else to</p> <p>16 be a plaintiff in this lawsuit or any of the</p> <p>17 other lawsuits --</p> <p>18 A. Well --</p> <p>19 Q. -- about this issue --</p> <p>20 A. -- no, but in my office, I did</p> <p>21 encourage a couple of guys to sign the</p> <p>22 petition that I signed.</p> <p>23 Q. Okay. I'm going to hand you a</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 41</p> <p>1 record for thirty seconds?</p> <p>2</p> <p>3 (Whereupon, a discussion was held</p> <p>4 off the record.)</p> <p>5</p> <p>6 MS. MESSICK: Let's go back on.</p> <p>7</p> <p>8 (Whereupon, Defendant's Exhibit 2</p> <p>9 was marked for identification and</p> <p>10 copy of same is attached hereto.)</p> <p>11</p> <p>12 Q. (BY MS. MESSICK) I'm going to</p> <p>13 hand you a document that I'm marking as</p> <p>14 Defendant's Exhibit 2. And I will represent</p> <p>15 to you that this is the complaint that you</p> <p>16 filed in this case earlier this year. So,</p> <p>17 this replaces the first one that you looked</p> <p>18 at. And my question, once again, is going to</p> <p>19 be, do you recognize this document?</p> <p>20 A. No.</p> <p>21 Q. Do you know why there are -- do</p> <p>22 you know what changed between the first</p> <p>23 complaint and the second complaint, what</p> <p>24</p> <p>25</p>

<p style="text-align: right;">Page 42</p> <p>1 facts might have required a new complaint?</p> <p>2 A. No. I couldn't tell you.</p> <p>3 Q. Okay. Have you read any expert</p> <p>4 reports in this case?</p> <p>5 A. No, I haven't.</p> <p>6 Q. Have you read any court opinions</p> <p>7 issued in this case?</p> <p>8 A. No, I haven't.</p> <p>9 Q. As you sit here today, can you</p> <p>10 think of any other documents that have been</p> <p>11 filed in this case that you would have read?</p> <p>12 A document that was filed is going to look a</p> <p>13 lot like these (indicating).</p> <p>14 A. No.</p> <p>15 Q. Okay. And for the record, these,</p> <p>16 I was referring to Exhibits 1 and 2.</p> <p>17 A. No.</p> <p>18 Q. What is your understanding of</p> <p>19 what redistricting is?</p> <p>20 A. From what I have gathered is that</p> <p>21 by remapping to include -- and I don't</p> <p>22 know -- I don't -- I -- I'm a little leery of</p> <p>23 calling the Washington County as being</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 44</p> <p>1 redistricting, what prompts it?</p> <p>2 A. A census take place.</p> <p>3 Q. Okay. In prior years, have you</p> <p>4 paid attention to how lines are redistricted</p> <p>5 after the census?</p> <p>6 A. Well, you know, to be frank with</p> <p>7 you, no, I haven't, but I worked on census</p> <p>8 and what the census -- a few years ago as</p> <p>9 getting a number count, going to different</p> <p>10 places to get everybody to sign and -- these</p> <p>11 long drawn-out forms, which, to be honest</p> <p>12 with you, I didn't do it through the whole</p> <p>13 period of time because I thought it was -- it</p> <p>14 was -- well, no, I do not.</p> <p>15 Q. Well, I was going to ask you</p> <p>16 about the census next.</p> <p>17 A. Yeah.</p> <p>18 Q. So, they did a census in 2020.</p> <p>19 And it sounds like you were encouraging</p> <p>20 people to fill out the census; is that right?</p> <p>21 A. That were many -- like I said,</p> <p>22 that were many years ago, and that was</p> <p>23 something I got out of work -- I was -- I --</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 43</p> <p>1 included in the -- in the redrawing of the</p> <p>2 lines and stuff, but as the -- it would give</p> <p>3 District 2 a more stable -- or you may say a</p> <p>4 more number count to select people that</p> <p>5 actually represent their interest.</p> <p>6 Q. Why did you single out Washington</p> <p>7 County?</p> <p>8 A. Because in looking at -- I told</p> <p>9 you I had seen -- just had seen a map. And I</p> <p>10 actually blowed up and -- that's the only one</p> <p>11 really name that sticks out that he included</p> <p>12 Washington County. And it sticks -- it just</p> <p>13 stuck with me.</p> <p>14 Q. Okay. So, you're looking for the</p> <p>15 districts that Alabama has drawn to be</p> <p>16 changed as part of this lawsuit. Do you have</p> <p>17 any knowledge about when the state draws new</p> <p>18 lines separate from when there are lawsuits</p> <p>19 that cause that to happen?</p> <p>20 A. Well, from my knowledge, I think</p> <p>21 they do that every ten years, don't they?</p> <p>22 Q. Okay. Do you know what happens</p> <p>23 every ten years just before they do the</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 45</p> <p>1 you had to go take a test, and then, they</p> <p>2 selected certain people. And then, I was one</p> <p>3 of the ones they selected. I had a little</p> <p>4 time -- I always had two or three jobs. So,</p> <p>5 that was just something I was doing and, you</p> <p>6 know, you did it on your own time when you</p> <p>7 would, you know, go out to where -- they gave</p> <p>8 you a area, a district that you worked in,</p> <p>9 addresses and all. And you went to their</p> <p>10 house, knocked on the doors. This was many</p> <p>11 years ago. And every person that did -- in</p> <p>12 the house had to be put on this --</p> <p>13 Q. Okay.</p> <p>14 A. -- form.</p> <p>15 Yeah. Yeah.</p> <p>16 Q. So, you actually picked up a side</p> <p>17 job working for the census --</p> <p>18 A. Uh-huh.</p> <p>19 Q. -- many years ago?</p> <p>20 A. Uh-huh.</p> <p>21 Q. For the 2020 census, did you have</p> <p>22 any role with the Census --</p> <p>23 A. No, I did not.</p> <p>24</p> <p>25</p>

<p style="text-align: right;">Page 46</p> <p>1 Q. -- Bureau?</p> <p>2 Do you know what the census --</p> <p>3 the 2020 Census showed about the change in</p> <p>4 population in Alabama?</p> <p>5 MS. JASRASARIA: Objection to</p> <p>6 form.</p> <p>7 You can answer.</p> <p>8 A. Well, I can't answer that because</p> <p>9 I haven't read anything on it.</p> <p>10 Q. (BY MS. MESSICK) Okay. Do you</p> <p>11 know what role, if any, population plays in</p> <p>12 drawing districts?</p> <p>13 A. In -- repeat that question. Put</p> <p>14 it in laymen terms because --</p> <p>15 Q. Okay. So, it sounds like you</p> <p>16 understand that the lines, for instance, for</p> <p>17 Congress, get redrawn after the census and</p> <p>18 you know the census is figuring out how many</p> <p>19 people live in an area --</p> <p>20 A. Uh-huh.</p> <p>21 Q. -- and also getting demographic</p> <p>22 data about those people.</p> <p>23 What I'm wondering is if you know</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 48</p> <p>1 Q. I'm sorry?</p> <p>2 A. Ridgecrest.</p> <p>3 Q. Ridgecrest?</p> <p>4 A. Uh-huh. You know, maybe I don't</p> <p>5 know as much as I do -- I don't know the</p> <p>6 area, what they call Regency Park, okay?</p> <p>7 Q. Cities or counties is fine. I'm</p> <p>8 not asking you to tell me neighborhoods in</p> <p>9 Montgomery.</p> <p>10 A. Oh, okay. No, I don't -- I</p> <p>11 don't -- I don't feel comfortable with --</p> <p>12 Q. Okay.</p> <p>13 A. -- answering that question.</p> <p>14 Other than my area. I know</p> <p>15 there's a large population of Blacks in my</p> <p>16 area now, forty-eight point some-odd percent.</p> <p>17 But other areas, I couldn't really tell you.</p> <p>18 I don't -- haven't paid much attention to</p> <p>19 that.</p> <p>20 Q. When you say your area, are you</p> <p>21 talking about --</p> <p>22 A. District 2.</p> <p>23 Q. -- Congressional District 2 --</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 47</p> <p>1 what the relationship is between what the</p> <p>2 census data show and how the lines get</p> <p>3 redrawn?</p> <p>4 MS. JASRASARIA: Objection.</p> <p>5 Form.</p> <p>6 But you can answer.</p> <p>7 A. I'm not going to even attempt</p> <p>8 that because, to be honest with you, I have</p> <p>9 very limited knowledge and I don't feel</p> <p>10 comfortable in giving you an opinion that I</p> <p>11 don't, you know --</p> <p>12 Q. Okay.</p> <p>13 A. -- really fully understand.</p> <p>14 Q. Okay. I don't know is a</p> <p>15 perfectly fine answer.</p> <p>16 Do you know where Black citizens</p> <p>17 reside in Alabama in large numbers?</p> <p>18 A. I know some spots where Black</p> <p>19 people reside.</p> <p>20 Q. Will you tell me the areas that</p> <p>21 you know about that have a large number of</p> <p>22 Black residents?</p> <p>23 A. Ridgecrest.</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 49</p> <p>1 A. Uh-huh.</p> <p>2 Q. -- based on the things that you</p> <p>3 read in --</p> <p>4 A. Right.</p> <p>5 Q. -- in preparation --</p> <p>6 A. -- because -- yeah, that, you</p> <p>7 know, I looked -- I just finished looking up</p> <p>8 all that stuff.</p> <p>9 Q. Okay. Thank you. I'm going to</p> <p>10 hand you a map that I'm marking as</p> <p>11 Defendant's Exhibit 3.</p> <p>12</p> <p>13 (Whereupon, Defendant's Exhibit 3</p> <p>14 was marked for identification and</p> <p>15 copy of same is attached hereto.)</p> <p>16</p> <p>17 Q. (BY MS. MESSICK) And I'll</p> <p>18 represent to you this is a map of Alabama</p> <p>19 counties that I got off the internet. And I</p> <p>20 just thought it might be helpful for you to</p> <p>21 have that handy.</p> <p>22 Can you tell me, if you know,</p> <p>23 which counties are in the Black Belt?</p> <p>24</p> <p>25</p>

<p style="text-align: right;">Page 50</p> <p>1 A. Well, I'll take -- I'll take a --</p> <p>2 Lowndes, Wilcox, Monroe, Clarke, Washington,</p> <p>3 Choctaw, Marengo, Dallas. In that area?</p> <p>4 That's -- I don't -- I don't -- I'm not for</p> <p>5 sure on that, okay?</p> <p>6 Q. Okay. Do you know what</p> <p>7 percentage of Alabama's population is Black?</p> <p>8 A. You know, I just read that, but I</p> <p>9 can't recall what it was. I just -- during</p> <p>10 the voting, I just saw that info, but I can't</p> <p>11 recall what it is.</p> <p>12 Q. Okay. Do you know -- so, after</p> <p>13 the census happens and it's time to</p> <p>14 redistrict and draw those new congressional</p> <p>15 district lines, do you know who in Alabama is</p> <p>16 responsible for drawing those lines?</p> <p>17 MS. JASRASARIA: Objection.</p> <p>18 Form.</p> <p>19 You can answer.</p> <p>20 A. I don't know.</p> <p>21 Q. (BY MS. MESSICK) Okay. So, the</p> <p>22 lines are actually passed as a law in</p> <p>23 Alabama.</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 52</p> <p>1 recognize this map?</p> <p>2 A. I recognize the map as being</p> <p>3 Alabama.</p> <p>4 Q. Okay. So, this was the map --</p> <p>5 A. Okay. So, this is prior to?</p> <p>6 Q. This is the map the legislature</p> <p>7 originally drew in 2021 and that prompted you</p> <p>8 to sue.</p> <p>9 What district, if you can tell</p> <p>10 from this map, did you -- do you live in</p> <p>11 under this map?</p> <p>12 A. I will be up there in Montgomery,</p> <p>13 District 2.</p> <p>14 Q. Okay. In this map, Montgomery is</p> <p>15 in Districts 2 and 7. Does this map have</p> <p>16 enough detail for you to know which district</p> <p>17 you lived in?</p> <p>18 A. Uh-huh.</p> <p>19 Q. Okay. And you believe you would</p> <p>20 have been in District 2?</p> <p>21 A. I am in District 2.</p> <p>22 Q. Okay. Do you have any</p> <p>23 information about how this map was drawn?</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 51</p> <p>1 A. Passed as a what?</p> <p>2 Q. It's a law like any other law.</p> <p>3 It's passed by the legislature, and then, the</p> <p>4 governor either signs it or vetoes it.</p> <p>5 So, there were legislative</p> <p>6 proceedings involved in drawing the</p> <p>7 congressional map. Did you follow any of</p> <p>8 those legislative proceedings?</p> <p>9 A. No, I didn't.</p> <p>10 Is this stuff you're giving me,</p> <p>11 I'm going to be able to keep?</p> <p>12 Q. Yes, you can keep those if you</p> <p>13 want.</p> <p>14 I'm handing you what I'm marking</p> <p>15 as Defendant's Exhibit 4.</p> <p>16</p> <p>17 (Whereupon, Defendant's Exhibit 4</p> <p>18 was marked for identification and</p> <p>19 copy of same is attached hereto.)</p> <p>20</p> <p>21 Q. (BY MS. MESSICK) And I will</p> <p>22 represent to you that this is the map that</p> <p>23 the -- that Alabama adopted in 2021. Do you</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 53</p> <p>1 A. Rephrase your question.</p> <p>2 Q. Do you have any information about</p> <p>3 what role, if any, race played in drawing</p> <p>4 this map?</p> <p>5 MS. JASRASARIA: Objection.</p> <p>6 Form.</p> <p>7 But you may answer.</p> <p>8 A. Well, if I understand you</p> <p>9 correctly, you're asking me -- you're asking</p> <p>10 me the reason that we feel as though they</p> <p>11 need to redraw this map? Is that what you're</p> <p>12 asking me?</p> <p>13 Q. (BY MS. MESSICK) No, but I'm</p> <p>14 going to ask you that, too. So, let's go</p> <p>15 ahead and do that one. What do you not like</p> <p>16 about this map?</p> <p>17 A. Well, adding, I guess you could</p> <p>18 call those, a couple cities that it would</p> <p>19 increase the percentage of Blacks that would</p> <p>20 give them, I guess you would call it, a</p> <p>21 better chance of selecting people that when</p> <p>22 they go to Washington, they would be more</p> <p>23 likely to present interest of people that</p> <p>24</p> <p>25</p>

<p style="text-align: right;">Page 54</p> <p>1 live in those areas. 2 Q. Okay. Do you have any evidence 3 about why the lines were drawn the way they 4 were in this particular map? 5 MS. JASRASARIA: Objection. 6 Form. 7 You can answer. 8 A. No, I don't have any evidence. 9 Q. (BY MS. MESSICK) Okay. So, 10 after this map was adopted, you sued, as did 11 some other people. There's three different 12 lawsuits challenging -- that originally 13 challenged this map. Do you know what 14 happened next in the litigation? 15 MS. JASRASARIA: Objection. 16 Form. 17 But you can answer. 18 A. Well, I guess it would follow the 19 normal sue process of going to -- can I ask 20 you a question or do you want me to just 21 answer your question? I'm not at liberty to 22 ask questions? 23 Q. (BY MS. MESSICK) There are very 24 25</p>	<p style="text-align: right;">Page 56</p> <p>1 couldn't be used. 2 And my side took an appeal to the 3 United States Supreme Court. Are you aware 4 that this case was in the United States 5 Supreme Court? 6 A. I -- yes, I somewhat was. 7 Q. Okay. 8 A. Yeah. 9 Q. Do you know what decision the 10 Supreme Court made? Do you know who won in 11 the Supreme Court? 12 A. No. 13 Q. Okay. Have you made any public 14 statements -- 15 A. No. 16 Q. -- about this litigation? 17 Did you attend the oral argument 18 at the Supreme Court? 19 A. No. 20 Q. So, you won, and as a result, a 21 new map was needed for this election that's 22 going on right now. And the legislature was 23 given the opportunity to draw a new map. Did 24 25</p>
<p style="text-align: right;">Page 55</p> <p>1 few questions you could ask me right now that 2 I would answer. But I don't want you to 3 speculate or tell me what you -- 4 A. Okay. So -- 5 Q. -- think -- 6 A. -- no. 7 Q. -- probably happened. 8 I just -- 9 A. No, I don't. 10 Q. -- want to know -- 11 A. No, no. No, I don't. 12 THE COURT REPORTER: I can only 13 get one at a time. 14 A. We'll go with I don't know. 15 Q. (BY MS. MESSICK) Okay. 16 THE COURT REPORTER: Please wait 17 and let her finish because I can only take 18 one person at a time. 19 Q. (BY MS. MESSICK) Okay. So, you 20 moved for a preliminary injunction, and the 21 district court gave it to you -- 22 A. Uh-huh. 23 Q. -- and said that this map 24 25</p>	<p style="text-align: right;">Page 57</p> <p>1 you follow those legislative proceedings? 2 A. No, but I do have -- and I'm not 3 being sarcastic or anything but -- well, I 4 know you didn't appeal or anything. But, 5 yeah, we won at the Supreme Court. And 6 what's the deal with the fight still goes on 7 all of this? You know, why are we still here 8 on this, you know? So, I -- 9 Q. Okay. So, the answer to that 10 question is that your side got a preliminary 11 injunction. So, that's a temporary 12 injunction. 13 A. Uh-huh. Uh-huh. 14 Q. And so, we're still going to go 15 to trial and to final judgment. 16 A. Basically, appealing it? 17 Q. No, we're going to have a trial 18 in the bottom level court, in the district 19 court. And then, depending on what happens 20 there, one side or the other might appeal. 21 And it'll eventually be over once we've had a 22 final trial and a final appeal. So, the 23 relief that you've gotten so far is 24 25</p>

<p style="text-align: right;">Page 58</p> <p>1 preliminary. And that's why we're still 2 here. 3 So, you told me that you did not 4 follow the 2023 proceedings in the 5 legislature. So, I'm going to show you the 6 map that the legislature adopted last year 7 after the Supreme Court's ruling. And this 8 will be Defendant's Exhibit 5. 9 10 (Whereupon, Defendant's Exhibit 5 11 was marked for identification and 12 copy of same is attached hereto.) 13 14 Q. (BY MS. MESSICK) And, again, the 15 map is on the third page. Do you remember 16 seeing this map before? 17 A. No. I take that back. I take 18 that back. I did see -- I did see something 19 like this last night on -- when I was looking 20 up -- yeah, I did see something like this 21 last night. 22 Q. Okay. So, what do you think of 23 this map? 24 25</p>	<p style="text-align: right;">Page 60</p> <p>1 A. I'm looking at 2021. It look 2 like Autauga and Elmore was in District 2. 3 I'm looking at '23, Autauga and part of 4 Elmore is out of District 2. However, 5 Lowndes and Butler -- okay. Lowndes -- but 6 anyway. 7 You know what? That -- the -- to 8 be honest, the map as a -- as a -- as a 9 citizen, a layperson, the map don't -- that's 10 for the people that we elected understand 11 these things, you know. And that a lot of 12 time, you go out of their wealth of knowledge 13 as to what they're asking for and the reason 14 they're asking for it. 15 Q. Okay. 16 A. So, I'm not a politician. So, I 17 would be -- any -- if I told you I 18 understood -- 19 Q. Okay. 20 A. -- what I was looking at, I would 21 be lying to you. 22 Q. Okay. 23 A. That's why we need, you know, a 24 25</p>
<p style="text-align: right;">Page 59</p> <p>1 MS. JASRASARIA: Objection. 2 Form. 3 But you can answer. 4 A. The date on this one right here 5 is 9/25/23. 6 Q. (BY MS. MESSICK) Oh, the dates 7 at the top are the same for both of these 8 documents. I used copies that were filed at 9 the same time and attached to another 10 document. If you look in the bottom right 11 corner, you can see Exhibit 4 is the 2021 map 12 and Exhibit -- 13 A. Uh-huh. 14 Q. -- 5 is the 2022. 15 A. I see '23, yeah. Okay. What do 16 I think the 2023 map looked like we're losing 17 ground, we're losing voters in District 2. 18 But I -- 19 Q. Do you mean the total number -- 20 A. Well, I'm -- 21 Q. -- of voters -- 22 A. -- looking at -- 23 Q. -- or -- 24 25</p>	<p style="text-align: right;">Page 61</p> <p>1 representative -- 2 Q. Yeah. 3 A. -- that represent our interest. 4 Q. Okay. I'm asking you questions 5 because if you have opinions that you're 6 going to speak -- you're going to testify in 7 court when we go to trial, I want to know 8 what you're going to say. But it's okay if 9 you don't have opinions or if you don't know. 10 I don't know or I don't remember or I don't 11 have an opinion are fine. And you don't need 12 to feel like you need to apologize for that. 13 So, do you know what happened 14 with respect to your lawsuit after the 2023 15 map was enacted? 16 MS. JASRASARIA: Objection. 17 Form. 18 You can answer. 19 A. No, I'm not -- 20 Q. (BY MS. MESSICK) Okay. 21 A. -- real sure. 22 Q. So, you got another preliminary 23 injunction is what happened. And the court 24 25</p>

<p style="text-align: right;">Page 62</p> <p>1 appointed a special master who proposed three 2 maps for the court to select from to force 3 the state to use for this election. Do 4 you -- did you know that a special master had 5 been appointed in this case? 6 A. No, I can't say I did. 7 Q. Okay. 8 A. Which is -- his job is to do 9 what? 10 Q. The court appointed the special 11 master to help the court draw a map to force 12 the state to use for the election this year 13 because the maps that the legislature had 14 drawn, the court did not approve of. 15 Did you see the special master's 16 report in this case? 17 A. No. 18 Q. Okay. Do you know what factors 19 the legislature considers when it's drawing 20 the maps? 21 MS. JASRASARIA: Objection to 22 form. 23 You can answer. 24 25</p>	<p style="text-align: right;">Page 64</p> <p>1 they want to elect to represent them. 2 They -- they're overpowered by the white 3 voters, I guess you would say. And so, this 4 would give them an equal opportunity to put 5 in a person that represent their interest. 6 Q. Okay. The people you're 7 referring to -- 8 A. Black people. 9 Q. Okay. 10 A. Or color -- or people of color. 11 Q. So, does -- is that everybody 12 who's not white? Is that Hispanics and 13 Koreans and just anybody who's not white 14 or -- 15 A. That's what the phrase "people of 16 color" is the people that falls under that 17 category, okay? 18 Q. What is that category? Are you 19 saying it's everybody who's not white or -- 20 A. Well, it's -- that's what that 21 phrase mean, people of color, almost. It's, 22 you know -- I didn't create that phrase. 23 That's a phrase that they designated to 24 25</p>
<p style="text-align: right;">Page 63</p> <p>1 A. No. 2 Q. (BY MS. MESSICK) Do you know 3 what the phrase "community of interest" 4 means? 5 A. What's the what? 6 Q. Community of interest, do you 7 know what that phrase means in the 8 redistricting context? 9 A. Yeah, somewhat. 10 Q. What is your understanding of 11 what that is? 12 A. Well, basically, that's -- well, 13 if you -- that's kind of why we're here, 14 because of the interest of the people that 15 feel like that, okay, their community's not 16 being fairly represented. So, they want 17 to -- the power to designate a person that 18 they can vote for that has a chance to 19 represent their interest. And as is -- as it 20 stands now, from what the little information 21 that I have, is that -- as it stands now, 22 even though it may be forty-eight percent, 23 they never really just get the person that 24 25</p>	<p style="text-align: right;">Page 65</p> <p>1 represent -- 2 Q. Okay. I'm not judging you. I'm 3 just trying to understand. And what I'd like 4 to understand right now is the group of 5 people that you're interested in having 6 representation in Congress. Does that group 7 include just Blacks or does it include others 8 as well? 9 A. Well -- and like I told you from 10 before, it's -- I mean, Black people have 11 voted for white leaders or white 12 representation before. So, they -- the power 13 to select the best person that seem to 14 represent their interest. Okay. 15 Q. Okay. 16 THE WITNESS: Can we take a break 17 so I can run to the restroom? 18 MS. MESSICK: Yes. Absolutely. 19 Let's take ten minutes. 20 21 (Whereupon, a brief recess was 22 taken.) 23 24 25</p>

<p style="text-align: right;">Page 66</p> <p>1 MS. MESSICK: We are back on the 2 record. 3 Q. Early on, you spoke about a 4 petition that you had signed. Do you have a 5 copy of that petition? 6 A. Oh, no. We didn't -- I didn't 7 keep it. I signed it and forwarded it on to 8 the next person. And -- actually, you went 9 into -- you went into a -- you opened the 10 document. It asked you to vote. A cursor 11 came up where you put your name and stuff in 12 it, hit submit, and then, it signed your name 13 to the petition. So, it wasn't something 14 that you -- a paper copy that you can copy 15 and keep, and then, it tell you what number 16 you was under that one. And you forward -- 17 you know, you send it out to as many people 18 as you want. And they signed what order they 19 fell in in signing it. And that's, you 20 know -- yeah. 21 Q. Okay. And you're describing 22 something that you did on the computer, 23 correct? 24 25</p>	<p style="text-align: right;">Page 68</p> <p>1 A. I had -- I was thinking I've seen 2 that name, but I don't know the person, okay? 3 Q. Okay. 4 A. And that's -- yeah. 5 Q. Very good. Thank you. You have 6 lived in both Lowndes County and Montgomery. 7 Are there things that you think Lowndes 8 County and Montgomery have in common? 9 MS. JASRASARIA: Objection. 10 Form. 11 You can answer. 12 A. Well, you have a lot of 13 Lowndes -- of Montgomery residents that lives 14 in Montgomery. Okay. I know -- I have some 15 cousins that live in Lowndes County. I was a 16 child when I lived there and moved when I was 17 twelve to Montgomery. But I know some people 18 that from Lowndes County moved to Montgomery. 19 When you say have in common, yes. 20 Just because you move from a certain rural 21 area to a, well, city or whatever, it -- you 22 still have some of the same basic needs, you 23 know. But -- so, in that respect, it will be 24 25</p>
<p style="text-align: right;">Page 67</p> <p>1 A. I did do this on the computer. 2 Q. Do you remember anything about 3 what the petition said? 4 A. Those names was -- it was 5 saying -- that's where I get these name from. 6 It was -- it was stating the fact of the -- 7 of the changing or redrawing the map for 8 District 2 or something of that nature to 9 be -- to obtain a better representation or 10 something. I don't remember the word because 11 this has been a while ago. This was way 12 back -- if I'm not mistaken, was it either 13 '18 -- 2018 or 2020, somewhere along in 14 there. I don't -- 15 Q. Okay. 16 A. -- recall the -- all the info 17 that was on it. 18 Q. Okay. And for the record, when 19 you refer to these names, you were pointing 20 to one of the complaints? 21 A. Well, it's -- that's where you 22 were asking me about did I know these people. 23 Q. Uh-huh. 24 25</p>	<p style="text-align: right;">Page 69</p> <p>1 their needs that they have to live a decent 2 and representative life. 3 Q. Okay. Have you spent any time in 4 Mobile -- 5 A. No. 6 Q. -- in the City of Mobile? 7 A. No. I've been to Mobile, but 8 I've never lived there. 9 Q. Okay. Do you know if Black 10 residents of Mobile have things in common 11 with, for instance, people in Lowndes County? 12 MS. JASRASARIA: Objection. 13 Form. 14 You can answer. 15 A. You know -- and this is my 16 opinion. But I think as a -- and I'm 17 speaking now strictly of Black people since 18 you said -- asked me about it. Okay. I 19 think the majority of Black people all have 20 something in common. So, whether it's -- 21 well, you know the fights that we have gone 22 through and all kinds of stuff. So, I think 23 we all have something in common. And our 24 25</p>

<p style="text-align: right;">Page 70</p> <p>1 freedom and equal rights has constantly been 2 challenged. 3 Q. So, Black people in Montgomery 4 have those things in common that you're 5 thinking of with Black people in Huntsville 6 also, right? 7 A. In Chicago, too. 8 Q. Okay. What about somebody who's 9 Black but, you know, immigrated to the 10 country -- 11 A. Yeah. 12 Q. -- in the last five years; is 13 that somebody that you have those same things 14 in common with? 15 MS. JASRASARIA: Objection to 16 form. 17 A. Who's Black that -- oh. 18 MS. JASRASARIA: I'm sorry. You 19 can answer. 20 A. Who's Black and did what? 21 Q. (BY MS. MESSICK) So, imagine 22 somebody grew up in Africa and they have 23 Black skin and their whole family's in 24 25</p>	<p style="text-align: right;">Page 72</p> <p>1 compatible to my -- to my work and trying to 2 go to school. So, I only did a quarter 3 there. But this was at Alabama State. 4 Q. Okay. 5 A. Yeah. 6 Q. When you were at Alabama State, 7 which degree was it that you were working 8 toward? 9 A. It was associate's. 10 Q. Okay. Do you have any 11 information about the intent of the 12 legislature when it drew the 2023 map, which 13 is Exhibit 5? 14 A. Their intent? 15 Q. Right. 16 MS. JASRASARIA: Objection. 17 Form. 18 You can answer. 19 A. I'm going to say no. 20 Q. (BY MS. MESSICK) Okay. Do you 21 have any information about the intent of any 22 individual member of the legislature in the 23 drawing of the 2023 map? 24 25</p>
<p style="text-align: right;">Page 71</p> <p>1 Africa, and five years ago, they moved to 2 Montgomery. The sorts of things that you're 3 saying that you have in common with other 4 Black people here, do you have those same 5 things in common with that person? 6 MS. JASRASARIA: Objection. 7 Form. 8 You can answer. 9 A. You know, I went to school with a 10 person from Africa. He had more financial 11 support than I did. Could go over here to 12 Alabama State and almost get -- they paid 13 most of his -- so, what I'm saying is, 14 sometime I think when you're talking about 15 another country, the U.S. will -- our country 16 seem to invest more in a person from another 17 country than they do the person that live 18 right here in the U.S. 19 Q. (BY MS. MESSICK) Was that person 20 you're thinking of, was that somebody you 21 knew at Troy? 22 A. It was a person -- this was -- I 23 went to Alabama State, but it wasn't 24 25</p>	<p style="text-align: right;">Page 73</p> <p>1 A. I would be speculating. I'm 2 going to say no. 3 Q. Okay. I'm handing you a document 4 that I'm going to mark as Defendant's Exhibit 5 6. 6 7 (Whereupon, Defendant's Exhibit 6 8 was marked for identification and 9 copy of same is attached hereto.) 10 11 Q. (BY MS. MESSICK) And I will 12 represent to you that this is the order that 13 the court issued, the trial court issued last 14 October where it said that the map the state 15 had drawn could not be used for these 16 elections that we're having now and imposed 17 its own map with the Secretary of State to 18 use in these elections. And that map is on 19 the very last page that the court selected. 20 My first question to you is, have you seen 21 this document before? 22 A. No. 23 Q. If you'll turn to the map -- 24 25</p>

<p style="text-align: right;">Page 74</p> <p>1 A. Okay. You know what? Remember</p> <p>2 me saying Washington?</p> <p>3 Q. Yes.</p> <p>4 A. This what I seen on the -- on the</p> <p>5 little info that I looked at the other night.</p> <p>6 And that's where I get that from.</p> <p>7 Q. Washington stood out to you in</p> <p>8 this map?</p> <p>9 A. Yeah, Washington, it stood --</p> <p>10 that's why when I was looking at these other</p> <p>11 maps, and I was like, okay, I don't even see</p> <p>12 where -- but, yes, this is where the -- one</p> <p>13 of the drawings that was out there on the</p> <p>14 redrawing of District 2.</p> <p>15 Q. Was there a different district</p> <p>16 that you thought Washington County should be</p> <p>17 in?</p> <p>18 A. Well, no. This was just</p> <p>19 information that -- I mean, when you asked me</p> <p>20 had I seen the map, and I'm just saying this</p> <p>21 is more like what I saw the --</p> <p>22 Q. Okay.</p> <p>23 A. -- other night.</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 76</p> <p>1 what percentage of people in District 2 are</p> <p>2 Black and old enough to vote; do you know</p> <p>3 that?</p> <p>4 A. Well, according to the -- it's</p> <p>5 between forty-eight point seven percent is</p> <p>6 what they had from the info that I've been</p> <p>7 reading.</p> <p>8 Q. Okay. Your lawyers hired a man</p> <p>9 named Bill Cooper to draw some maps as part</p> <p>10 of their effort to prevail in this case.</p> <p>11 Have you ever met Bill Cooper --</p> <p>12 A. Huh-uh.</p> <p>13 Q. -- the map drawer?</p> <p>14 A. Huh-uh.</p> <p>15 Q. Have you seen his report in this</p> <p>16 case?</p> <p>17 A. No.</p> <p>18 Q. Have you seen the maps that Bill</p> <p>19 Cooper drew in this case?</p> <p>20 A. No, ma'am, I haven't.</p> <p>21 Q. If Alabama's congressional</p> <p>22 districts were drawn in such a way that there</p> <p>23 were two districts that had a sufficient</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 75</p> <p>1 Yeah. That's all I'm saying.</p> <p>2 Q. Do you have any opinion about</p> <p>3 this map?</p> <p>4 MS. JASRASARIA: Objection.</p> <p>5 Form.</p> <p>6 You can answer.</p> <p>7 A. I do not.</p> <p>8 Q. (BY MS. MESSICK) Okay. What</p> <p>9 district do you live in on this map?</p> <p>10 A. It's still 2.</p> <p>11 Q. And it looks like Lowndes County</p> <p>12 moved back up -- moved into District 7?</p> <p>13 A. Yeah.</p> <p>14 Q. Is this the map that you think</p> <p>15 that is approximately forty-eight percent</p> <p>16 Black in District 2?</p> <p>17 A. Well, the forty-eight percent</p> <p>18 came from prior to the drawing.</p> <p>19 Q. Okay. Do you have -- do you know</p> <p>20 what the Black voting age population is in</p> <p>21 District 2?</p> <p>22 A. What is the?</p> <p>23 Q. The Black voting age population,</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 77</p> <p>1 Black population that Black voters could</p> <p>2 control the outcome of the elections in those</p> <p>3 two districts, would it satisfy you if that</p> <p>4 happened but you did not live in one of those</p> <p>5 Black districts?</p> <p>6 MS. JASRASARIA: Objection.</p> <p>7 Form.</p> <p>8 But you can answer.</p> <p>9 Q. (BY MS. MESSICK) Would that kind</p> <p>10 of scenario address what -- provide you with</p> <p>11 the relief you were trying to get in this</p> <p>12 lawsuit?</p> <p>13 A. If I didn't live in the district?</p> <p>14 Q. Right. So, there's two Black</p> <p>15 districts, but you don't live in them.</p> <p>16 A. So, are you asking me that -- are</p> <p>17 you asking me whether or not I would have a</p> <p>18 interest in what going on with a race of</p> <p>19 people in a district even though I don't live</p> <p>20 there?</p> <p>21 Q. I'm asking you if it would -- so,</p> <p>22 when you filed the lawsuit, you were looking</p> <p>23 for certain relief. You're trying to get the</p> <p>24</p> <p>25</p>

<p style="text-align: right;">Page 78</p> <p>1 court to do something. Would you be 2 satisfied if the end result was that there 3 were two Black districts in Alabama, but you 4 didn't live in either one of them? 5 MS. JASRASARIA: Objection. 6 Form. 7 You can answer. 8 A. Excuse me. But, of course, we 9 are -- we -- that's a speculating question 10 because we're here for this district, okay? 11 So, to answer to your question, would those 12 district also represent my district? They 13 wouldn't, would they? 14 Q. (BY MS. MESSICK) No, you would 15 live in a different district. 16 A. Uh-huh. And so, when -- we would 17 vote for a district representative that 18 hopefully that represented -- we had a body 19 out there, there's needs or something, that 20 represented us. So, I would be -- I would 21 be -- I would be happy with that district and 22 what they want, okay? And hopefully whoever 23 we put into office through electing that 24 25</p>	<p style="text-align: right;">Page 80</p> <p>1 they wouldn't want a Republican in a -- in a 2 Democratic district. So, if the person -- 3 yeah. 4 Q. Do you believe that if the State 5 of Alabama can draw a congressional district 6 with a Black majority, then, it should do 7 that? 8 MS. JASRASARIA: Objection. 9 Form. 10 You can answer. 11 A. Come again. I -- 12 Q. (BY MS. MESSICK) Do you believe 13 that if the State of Alabama can draw a Black 14 majority district, then, it should draw a 15 Black majority district? 16 A. Uh-huh. 17 Q. And do you believe if the State 18 of Alabama can draw a majority Black 19 congressional district, then, it is required 20 to do so? 21 MS. JASRASARIA: Objection to the 22 extent it calls for a legal conclusion, but 23 you may answer. 24 25</p>
<p style="text-align: right;">Page 79</p> <p>1 person, hopefully, they work hard to get -- 2 you know, to satisfy our desires. 3 So, that would not -- I wouldn't 4 have a bad feeling or -- I would have a good 5 feeling for a district that gets what they 6 want. And I guess it would be especially if 7 it was, you know, of color, I guess. 8 Q. Is it your goal in this 9 litigation to get a second Democrat elected 10 to Congress from Alabama? 11 A. Well, it's -- it would be because 12 that person would be Democrat, or should be 13 Democrat if -- you know, if that body has 14 anything to do with them because, you know -- 15 Q. Can you expand on that? 16 A. Huh? 17 Q. Can you explain what you mean a 18 little bit more? 19 A. No, I was just saying it is -- 20 that district is a Democratic district. So, 21 the reason why we're here is to strengthen 22 that district so it can better -- get people 23 that will represent it. So, we wouldn't -- 24 25</p>	<p style="text-align: right;">Page 81</p> <p>1 A. I think they should put as much 2 effort as possible in trying to satisfy the 3 people that have the majority in that 4 district. 5 Q. (BY MS. MESSICK) What does that 6 mean? 7 A. That they -- that if that 8 district is majority Democrat or Black, 9 whatever, then, I don't see why the state 10 would hinder that district voting for a 11 person that would better represent them. 12 Q. So, I'm talking about when you're 13 at the drawing process. So, there's no 14 districts in place. If the state can draw a 15 majority Black district, do you think the 16 state is required to do that? 17 MS. JASRASARIA: Same objection 18 to the extent it calls for a legal 19 conclusion, but you may answer. 20 A. If that's what the people want, 21 that's what the district feel as though they 22 want. 23 Q. (BY MS. MESSICK) Who represents 24 25</p>

<p style="text-align: right;">Page 82</p> <p>1 you in the United States House of 2 Representatives today? 3 A. Who represent me? 4 Q. Right. Who's your congressman? 5 A. Talking about Sewell? Oh, you're 6 talking about my -- you're talking about my 7 congressman? 8 Q. Congressional District 2. 9 A. Oh, man. Oh, well, she's a lady, 10 I think. 11 THE WITNESS: I believe she's a 12 lady, isn't she? 13 THE COURT REPORTER: Can you 14 speak up? 15 MS. JASRASARIA: I can't answer. 16 A. You know what? You know what? 17 Q. (BY MS. MESSICK) Okay. 18 A. Me and my wife were just talking 19 about that. But I don't -- I don't know. 20 Who is it? 21 Q. Barry Moore. 22 A. Barry Moore. That's correct. 23 That's correct. 24 25</p>	<p style="text-align: right;">Page 84</p> <p>1 and -- I met Terri Sewell once. We had -- 2 when we went to -- I don't know a lot about 3 Terri Sewell per se. 4 Q. Okay. 5 A. I know her as a -- as a person 6 that represents -- I don't know a lot about 7 Terri Sewell. 8 Q. Okay. 9 A. Let's put it like that, yeah. 10 Q. You know she's in Congress -- 11 A. She's in Congress because I have 12 a picture in her office when we was up there 13 for the rapid response. 14 Q. Okay. What were you doing in 15 Washington for the rapid response? 16 A. Well, remember I told you that 17 we -- rapid response is -- we solicit 18 signatures to support different legislations, 19 labor legislations that sometime come to pass 20 that they need union represent -- or people 21 to represent it, to put paper in front of 22 representatives that see the interest that 23 they have about a certain issue. 24 25</p>
<p style="text-align: right;">Page 83</p> <p>1 Q. Okay. Have you ever contacted 2 Representative Moore for his help with 3 anything? 4 A. No. 5 Q. Have you ever contacted him for 6 any other reason -- 7 A. No. 8 Q. -- while he's been in Congress? 9 Before Barry Moore, it was Martha 10 Roby. 11 A. Yeah. Yeah. 12 Q. Have you ever -- 13 A. I haven't contacted her either. 14 Q. Okay. Is there any federal 15 legislation that you can think of as you're 16 sitting here now that you wanted your 17 representative in Congress, in the House, not 18 the -- in the House, to support, and they 19 didn't support that legislation? 20 A. I can't think of a time. 21 Q. What do you know about Terri 22 Sewell? 23 A. Other than she's from Selma 24 25</p>	<p style="text-align: right;">Page 85</p> <p>1 Q. Okay. Have you ever reached out 2 to Representative Sewell for anything? 3 A. No. 4 Q. Do you -- 5 A. Well, the Trade Act, one of the 6 bills that we was trying to get represented 7 for while we was at the rapid response. She 8 was one of the persons that was actually 9 supporting that effort. So, that's why we 10 met her. We went to meet her and talk to her 11 to beg her to try and get her to stand ground 12 and to give us that report on that Trade Act 13 with foreigner. 14 Q. Do you know what it means for an 15 election to be racially polarized? 16 A. Yeah, somewhat. 17 Q. What do you understand that to 18 be? 19 A. Well, racially motivated, you 20 might -- you might say that monopolized by a 21 certain group of people that is -- you know, 22 the other party may not have a chance. But 23 you're putting racial in it. You know, I 24 25</p>

<p style="text-align: right;">Page 86</p> <p>1 hate to say that is directed at a certain 2 group of people to keep them from a certain 3 gang or whatever. 4 Q. Do you have any information about 5 the extent to which voting is racially 6 polarized in Alabama? 7 A. No. 8 Q. Do you have information about the 9 extent to which voting is racially polarized 10 in any part of Alabama? 11 MS. JASRASARIA: Objection to 12 form, but you can answer. 13 A. I would say no, and this is 14 not -- I would say no, but at the same time, 15 when you consider prior to Obama, you know, 16 that was in there. I think it was -- it was 17 somewhat tainted with the order of being 18 racially polarized because we never just had 19 a person of color as a representative in the 20 presidential election. So, if you wanted to 21 go that route. We may be off key here. 22 Let's just -- let's just go on. Let's just 23 go. 24 25</p>	<p style="text-align: right;">Page 88</p> <p>1 A. Yeah. 2 Q. Can you think of any time in the 3 last twenty years where you have seen in 4 campaign materials or coming from any 5 candidate's campaign any kind of messages 6 that are racially directed, you know, 7 something along the lines of vote for this 8 candidate because he's Black or -- 9 A. No. 10 Q. -- don't vote for that candidate 11 because he's Black? 12 MS. JASRASARIA: Objection to 13 form. 14 Q. (BY MS. MESSICK) Anything racial 15 as part of a campaign. 16 MS. JASRASARIA: Objection to 17 form. 18 You can answer. 19 A. No, I haven't. 20 Q. (BY MS. MESSICK) Okay. Are you 21 registered to vote? 22 A. I am. 23 Q. When did you first register? 24 25</p>
<p style="text-align: right;">Page 87</p> <p>1 Q. (BY MS. MESSICK) Well, tell me 2 more about what you're thinking about 3 President Obama. What are you saying the 4 situation was before he ran? 5 A. Well, prior to that, there 6 wasn't -- you know, you -- it wasn't the -- I 7 don't know whether you would say the interest 8 or it was just control basically by -- a 9 person of color didn't have a chance. And it 10 was -- it always has been white. And I guess 11 if you was to ask the average Black person, 12 they would say it would be tainted with 13 racial polarizing simply because they -- the 14 House was controlled by, you know, not people 15 of color but of opposite race. 16 Q. Can you -- I'm sorry. 17 A. No. 18 Q. Were you going to say something? 19 A. You don't want to elaborate on 20 that because we're getting into something -- 21 this is a little bit off -- I should not have 22 said that. I should have just said no. 23 Q. Okay. 24 25</p>	<p style="text-align: right;">Page 89</p> <p>1 A. When I was eighteen probably. 2 Q. And do you remember having any 3 problems registering to vote when you were -- 4 when you first registered? 5 A. No. 6 Q. That would have been in the -- 7 A. No. No. That was many years 8 ago. I was getting ready to go to the 9 military. And -- no. 10 Q. Did you ever register to vote 11 outside of Alabama? 12 A. No. 13 Q. Since you've been in the same 14 house for twenty-three years, it's probably 15 been a while, but I would assume that over 16 the years, you've had to update your 17 registration -- 18 A. Uh-huh. 19 Q. -- to reflect any changes. 20 A. Uh-huh. 21 Q. Do you remember ever having any 22 problems with that process? 23 A. No. Actually, I was -- I lived 24 25</p>

<p style="text-align: right;">Page 90</p> <p>1 out in Ridgecrest. And when I got ready to 2 change my voting, they changed automatically 3 because I renewed my license. So, 4 apparently, those two is hooked together. 5 So, wherever your address is on your license, 6 I think that's what they do, is send you your 7 next voting poll, where you will vote at. 8 So, I never had any problem with registering 9 to vote. 10 Q. Are you aware of any problems 11 that your wife has ever had -- 12 A. No. 13 Q. -- with registering to vote or 14 updating her registration? 15 A. No. 16 Q. You said earlier that three of 17 your children have registered to vote in 18 Alabama -- 19 A. Uh-huh. 20 Q. -- at one time or another. 21 Are you aware of any of those 22 three children having problems registering -- 23 A. No. 24 25</p>	<p style="text-align: right;">Page 92</p> <p>1 of that. 2 Q. So, it sounds like those people 3 were already registered? 4 A. They were. 5 Q. Just focusing on the registration 6 process -- 7 A. Uh-huh. 8 Q. -- can you remember a time when 9 you have tried to help somebody register to 10 vote? 11 A. Other than my church, you know, 12 no. 13 Q. Okay. How often do you vote? 14 A. Well, if I'm not on vacation -- 15 because I missed one year. But most of the 16 time, whenever there's a vote, whether it's 17 in my district or something or whether it's 18 for the presidential or whatever, I try to 19 vote whenever there is a change of -- you 20 know, whenever it comes around. 21 Q. Okay. 22 A. I try to be in -- yeah. 23 Q. So, you know, in Alabama, we 24 25</p>
<p style="text-align: right;">Page 91</p> <p>1 Q. -- to vote? 2 Are you aware of any of your 3 children having problems updating their voter 4 registration? 5 A. No. 6 Q. Do you ever help other people 7 register to vote? 8 A. I helped -- I took a couple 9 people one time to vote. In fact -- in fact, 10 when they had the ballots sometime, there was 11 a couple people that was bedridden that me 12 and a friend of mine's helped them fill out 13 their ballots and stuff. So -- because they 14 asked for a ballot, you know -- 15 Q. Right. 16 A. -- before they became bedridden. 17 They were some of the ones that 18 we used -- you know, we went by there and 19 said, hey -- church members, you know, 20 that -- so, we would help them if they needed 21 a ride, take them to vote. 22 Q. Okay. 23 A. And so -- but that's the extent 24 25</p>	<p style="text-align: right;">Page 93</p> <p>1 elect the governor and other state officers, 2 including the legislature, two years off from 3 when we -- 4 A. Uh-huh. 5 Q. -- elect a president, right? 6 A. Uh-huh. 7 Q. So, we elected Governor Ivey 8 again two years -- 9 A. Uh-huh. 10 Q. -- ago, and this is a 11 presidential year. 12 Do you vote in both kinds of 13 elections? 14 A. Uh-huh. 15 Q. Like, every two years -- 16 A. Uh-huh. 17 Q. -- you vote? 18 I think the court reporter's 19 getting it, but it would help if you would -- 20 A. Oh, yes, ma'am -- 21 Q. -- speak your answer. 22 A. -- I do. 23 Yes, I do. Sorry about that. 24 25</p>

<p style="text-align: right;">Page 94</p> <p>1 Q. Thank you. Do you vote just in 2 the general election in November or do you 3 also vote in any primaries earlier in the 4 year? 5 A. And most of -- most of the time, 6 both of them. 7 Q. Most of the time, the primaries 8 and the -- 9 A. Uh-huh. 10 Q. -- general? 11 A. Yes. 12 Q. Do you also vote in municipal 13 elections, that is, like the City of 14 Montgomery, mayor, city council? 15 A. Yes, I do. 16 Q. Okay. 17 A. Most of the time. 18 Q. Most of the time. Where is the 19 last polling place that you voted at? 20 A. It is -- I ain't got my wallet. 21 But it's out by -- there's a church right out 22 by Gardner on Congressman Dixon Drive. 23 Q. Okay. Is that polling location 24 25</p>	<p style="text-align: right;">Page 96</p> <p>1 lunch break, take care of it, and I haven't 2 had long lines. But if you wait till -- if 3 you try and get in there real early mornings 4 or late in the evenings, sometime you're 5 going to find long lines. 6 Q. Okay. 7 A. Not real -- not super long line 8 but depending on what you're voting for, 9 okay? So, that has a lot to do with it, too. 10 Q. Yeah, the longest line I ever saw 11 here was for a presidential election. 12 A. Yeah. Uh-huh. 13 Q. Have you personally ever had to 14 wait in line for more than twenty minutes? 15 A. No. 16 Q. Do you normally wait for more 17 than ten? 18 A. No. 19 Q. Have you voted at any other 20 polling place in, say, the last ten years? 21 A. Ten years. Okay. They 22 changed -- this last two years, they changed 23 it from -- there's a little -- well, it 24 25</p>
<p style="text-align: right;">Page 95</p> <p>1 convenient for you? 2 A. Yes. Yes. 3 Q. Have you ever showed up at that 4 polling location on election day between 7:00 5 a.m. and 7:00 p.m. and found that the polling 6 place wasn't open? 7 A. Oh, no. Huh-uh. 8 Q. Have you ever had any problems at 9 that polling place that you can think of? 10 A. To be honest, I have not. People 11 been outstanding, to be honest with you. 12 Yeah. 13 Q. That's great. Do you know any of 14 the people who are working at the polls? 15 A. There was a elderly lady that I 16 know of her and name and she used to -- she 17 wasn't there this time, but she used to work 18 there at the voting booth. 19 Q. Okay. Have you ever had really 20 long lines at your polling -- at that polling 21 place? 22 A. You know, it's depending on what 23 time you go. I normally run out during my 24 25</p>	<p style="text-align: right;">Page 97</p> <p>1 changed -- it actually didn't even move a 2 half a mile because they moved it from the 3 park complex to the church complex. So, I 4 just leave those two at the same. They just 5 changed it. But I used to be able to vote at 6 Bethel Baptist Church over on Rosa Park many 7 years ago for a long time. 8 Q. Did you ever have any problems 9 voting there? 10 A. That's where some of the longest 11 line for -- that was some of the longest 12 lines that I ever experienced, but I never 13 had any problem. People over there was nice, 14 also. 15 Q. Okay. In my experience in 16 Montgomery, in recent years, sometimes you 17 vote at a different place for the city 18 elections than you do for the federal, 19 county, and state. Did you have that 20 experience -- 21 A. No. 22 Q. -- where you voted one place for 23 governor and a different place for mayor? 24 25</p>

<p style="text-align: right;">Page 98</p> <p>1 A. No. It seemed to be the same 2 place for both of them. 3 Q. Okay. Have you ever voted 4 absentee in Alabama? 5 A. No. 6 Q. It sounds like you helped other 7 people vote absentee? 8 A. Yes. They was a elderly person 9 that was -- that wanted to vote and asked us 10 would we bring her a ballot. And so, we 11 helped her fill out a ballot. I think that 12 was back -- that's when Biden was running, 13 actually. 14 Q. Okay. 15 A. President Biden. 16 Q. Did you have any problems -- 17 A. Getting a ballot? 18 Q. Yeah, getting the ballot and 19 helping her with it. 20 A. No. Actually, I didn't get it. 21 It was a gentleman that I think worked for 22 the state had a few ballots. And so, the 23 people that needed one, they gave them to 24 25</p>	<p style="text-align: right;">Page 100</p> <p>1 Q. Okay. So, sometimes it's hard 2 to get them motivated, but if they go 3 vote, you're not aware of them having any 4 problems -- 5 A. Correct. 6 Q. -- doing that? 7 Okay. When you decide which 8 candidate you personally support, is race the 9 significant consideration? 10 A. Issues is a consideration, what 11 they -- what the issues are, the -- you know, 12 what are they saying they're going to do not 13 necessarily for me but, you know, the economy 14 and everything else. It's the issues. And 15 sometime -- and -- but, yeah, it's the 16 issues. It's not -- it's not -- mostly -- 17 it's not a racial thing because you know 18 what, because most of the time, you don't 19 have a -- you don't have -- like I'm saying, 20 most of the time, you don't have a people -- 21 person of color on the ballot. This just 22 started happening, okay? You don't agree 23 with that? 24 25</p>
<p style="text-align: right;">Page 99</p> <p>1 them, yeah. 2 Q. Okay. Does your wife regularly 3 vote? 4 A. Uh-huh. 5 Q. Are you aware of any problems 6 that -- 7 A. No. 8 Q. -- she's had? 9 Are you aware of any problems 10 that your adult children have had trying to 11 vote in Alabama? 12 A. They hadn't had any problems. 13 It's just that convincing them to vote 14 consistently, you know, let them tally it. 15 Young generation sometime think it's not 16 going to do any good, you know. So, they 17 don't understand that voting determine the 18 electoral votes, and then, the electoral 19 votes determine who -- you know, how many. 20 But let them tally your vote, though. Some 21 of them say your vote don't mean anything, 22 you know. But sometimes they'll do it 23 because of the conversation. Yeah. 24 25</p>	<p style="text-align: right;">Page 101</p> <p>1 Q. Which issues are important to 2 you? 3 A. Well, you know -- what I'm about 4 to say -- I'm trying to answer that question. 5 But what -- you know, what -- I never 6 understood why after twenty-five years, you 7 know, if we have to resign the -- what's 8 the -- I can't even come up with the name 9 now. The rights for Black people -- you 10 know. Why do we have to do that? I don't 11 understand that. That's an issue to me, 12 actually. 13 But issues would be -- issues 14 would be jobs, the economy, infrastructure, 15 our support to foreign countries and things 16 of that nature when we have so many problems 17 right here at home. Like -- it just -- 18 security. I would say being -- you know, I 19 would say even the number of people that we 20 even allow here in the United States. There 21 should be a cutoff because resources. 22 You know, me -- I used to work 23 for H&R Block part time after work. And 24 25</p>

<p style="text-align: right;">Page 102</p> <p>1 you've got a lot of people that come in here 2 and get support that haven't really did too 3 much, but they get child and then -- child 4 tax credit and all kinds of other stuff. And 5 it -- I don't know. It seemed like it's -- I 6 don't know. Some of this, I think, out of 7 control. 8 And I don't see where -- and I 9 think a lot of the things that we do here in 10 America is not monitored properly to better 11 use the resources that we just hand out, and 12 then, we make it so hard for people that are 13 here to even obtain -- you know. 14 Why we even have poor people, 15 homeless people only? I don't understand it. 16 We're rich, supposed to have all this wealth. 17 I don't even understand. Like, there should 18 be some kind of person that's able-bodied 19 should be retrained and put into some type of 20 gainful employment to support themselves, you 21 know. Got -- just so much, you know. It's 22 almost so much, you know. It's -- and it 23 ain't nothing really being -- that you can 24 25</p>	<p style="text-align: right;">Page 104</p> <p>1 was a couple of people that don't drive 2 that -- especially elderly people that would 3 like to go vote. And so, they will put their 4 name in -- on the list as to people needing 5 transportation to go to the poll and vote -- 6 and vote. And so, being connected to a 7 church organization where you've got -- list 8 people need to go vote, if you ain't doing 9 anything, you may just take several people to 10 vote. 11 Q. Okay. Do you consider yourself 12 to be politically active? 13 A. This is about the -- this and the 14 union about the most active part that I 15 have -- I don't get -- I said I don't get 16 involved in politics, however, it seems as 17 though, lately, you know, politics is taking 18 up everything, a large part of your life when 19 you think about it. So -- but this and the 20 union is -- 21 Q. Okay. 22 A. -- is about the most involvement 23 I -- if I had known, I wouldn't have joined 24 25</p>
<p style="text-align: right;">Page 103</p> <p>1 see that's happening fast anyway. It just 2 seem like it's piling up on top of each 3 other, you know. 4 So -- but, again, that's one 5 person that sit down and start looking at 6 condition of your environment. You see all 7 of this stuff. It could be overwhelming, 8 but, you know, that's just my opinion. 9 Q. Okay. Thank you. 10 MS. MESSICK: Can we go off the 11 record for just a second? 12 13 (Whereupon, a discussion was held 14 off the record.) 15 16 Q. (BY MS. MESSICK) Have you ever 17 worked at a polling place on election day? 18 A. No. 19 Q. Have you helped people get to the 20 polls on election day? 21 A. Uh-huh. 22 Q. Tell me about that. 23 A. Well, like I was saying, there 24 25</p>	<p style="text-align: right;">Page 105</p> <p>1 this. 2 I probably would have turned it 3 down the first call I got, okay? I thought 4 it was just a formality or something, and it 5 would take -- okay. So -- you know -- and 6 from a phone call, a couple of phone calls -- 7 THE WITNESS: This wasn't you. 8 This was -- 9 A. From a phone call to -- 10 MS. JASRASARIA: Yeah, and I'm 11 just going to instruct you not to answer 12 about any conversations you've had with any 13 attorneys -- 14 THE WITNESS: Right, right, 15 right, right. 16 MS. JASRASARIA: -- on this case. 17 You can answer to the extent it's 18 not privileged. 19 THE WITNESS: Right, right. 20 A. And I'm just saying yeah to, you 21 know, just asking me will I and, you know, 22 represent -- that's -- and I'm thinking, 23 okay. So, I answered a couple of questions. 24 25</p>

<p style="text-align: right;">Page 106</p> <p>1 I had no idea that we were going to be doing 2 nothing like this. 3 Well, no, I didn't have -- I 4 didn't have no idea before I got -- say I 5 would do it, and then, I was told that 6 it's -- these are some meetings that are 7 going to take -- but, no. Absolutely, no, I 8 don't do politics most of the time. However, 9 I'm thinking when I retire, though, to get 10 more involved in things that are happening in 11 my district and community, you know. 12 Q. (BY MS. MESSICK) Do you have a 13 retirement date in mind? 14 A. If -- it going to be between now 15 and August of next year. 16 Q. Okay. 17 A. I'll be seventy. And so, then, 18 I'll give it up. 19 Q. Are you a member of any political 20 party at the state or county level? Well, 21 just -- are you a member of a political 22 party? 23 A. Am I a Democrat? 24 25</p>	<p style="text-align: right;">Page 108</p> <p>1 A. No, I'm not. 2 Q. Okay. You don't pay dues to 3 the -- 4 A. No. 5 Q. -- party? 6 Have you always considered 7 yourself to be a Democrat? 8 A. Yes. 9 Q. And is that because you -- well, 10 why do you consider yourself to be a 11 Democrat? 12 A. Well, to -- the very truthful 13 answer would be because of culture and, you 14 know -- and the -- for the people I be for, 15 and it's -- my family was. And so, I never 16 moved out of that mind set of that party. 17 Q. Have you ever at any time had a 18 leadership role in the Democratic Party? 19 A. No. 20 Q. Do you ever vote for candidates 21 in partisan elections? So -- let me start 22 over. 23 Municipal elections, there's no 24 25</p>
<p style="text-align: right;">Page 107</p> <p>1 Q. Or a Republican or a Green. Are 2 you any -- 3 A. So, if I -- if I say I'm a 4 Democrat, that make me a member of the 5 Democratic Party, or do you -- are you 6 talking about active member doing certain 7 things working with a -- with a certain 8 political party? 9 Q. Okay. Do you consider yourself a 10 Democrat? 11 A. I do. 12 Q. Do you attend meetings with the 13 Democratic Party? 14 A. I do not attend any meetings, no. 15 Q. Do you pay any kind of dues to 16 the Democratic Party? 17 A. I do not give donation to -- I 18 did a long time ago. I do not give donation 19 to Democratic parties, not recently. 20 Q. Okay. Separate from donations to 21 the party or a particular candidate, to be an 22 official member of the party, they have dues 23 just like you have union dues. 24 25</p>	<p style="text-align: right;">Page 109</p> <p>1 party. You're just voting for a candidate. 2 So, let's put those out of our mind. For the 3 county, state, and federal elections where 4 there are Republicans on the ballot, there 5 are Democrats on the ballot, there might 6 sometimes be others, do you ever vote for the 7 candidate -- a candidate who is not a 8 Democrat? 9 MS. JASRASARIA: Objection to 10 form. 11 You can answer. You shouldn't 12 check your phone. Sorry. 13 THE WITNESS: I'm turning it -- 14 MS. JASRASARIA: Oh, you're 15 turning it off. 16 THE WITNESS: -- off -- 17 MS. JASRASARIA: Okay. 18 THE WITNESS: -- because it was 19 dinging, I guess, getting a -- 20 MS. JASRASARIA: Okay. 21 THE WITNESS: -- text message. 22 So, I had it cut down on low, but 23 it was dinging still. 24 25</p>

<p style="text-align: right;">Page 110</p> <p>1 MS. JASRASARIA: No problem.</p> <p>2 A. Come again.</p> <p>3 Q. (BY MS. MESSICK) In an election</p> <p>4 where you have Democrats and Republicans and</p> <p>5 maybe others on the ballot, maybe</p> <p>6 Libertarians or Green, or whatever, do you</p> <p>7 ever vote for candidates who are not</p> <p>8 Democrats?</p> <p>9 MS. JASRASARIA: Objection --</p> <p>10 A. I have.</p> <p>11 MS. JASRASARIA: -- to form.</p> <p>12 A. I have. Uh-huh.</p> <p>13 Q. (BY MS. MESSICK) Okay. Have you</p> <p>14 done that recently?</p> <p>15 A. Not recently, but, yes, I have in</p> <p>16 the past.</p> <p>17 Q. Okay. How long ago,</p> <p>18 approximately?</p> <p>19 A. There was some -- it's been a</p> <p>20 while. It's been a while.</p> <p>21 Q. Like more than ten years?</p> <p>22 A. Probably ten years or more, yeah.</p> <p>23 Q. Okay.</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 112</p> <p>1 and -- it seemed like I remember one time,</p> <p>2 there wasn't a -- for a certain office, there</p> <p>3 wasn't a Democratic being represented. It</p> <p>4 was all just Republican guys. So, I voted</p> <p>5 for the Republican dude that I had thought I</p> <p>6 knew something about or what he represented.</p> <p>7 So, I'm not -- I would, you know --</p> <p>8 Q. (BY MS. MESSICK) Okay.</p> <p>9 A. -- yeah.</p> <p>10 Q. Have you ever run for office?</p> <p>11 A. Other than the union president?</p> <p>12 Q. Right. Put the union aside.</p> <p>13 A. No, I haven't. Nothing that</p> <p>14 would -- no.</p> <p>15 Q. Okay. You said earlier that you</p> <p>16 might get more involved in politics after you</p> <p>17 retire. Does that include maybe running for</p> <p>18 office?</p> <p>19 A. I'm a firm believer that when you</p> <p>20 get involved in politics, you know, sometime</p> <p>21 it's like digging a hole. You start at the</p> <p>22 top and you do anything good, sometime your</p> <p>23 next thing, you know, you're wrapped up in</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 111</p> <p>1 MS. MESSICK: Could we go off the</p> <p>2 record for one minute?</p> <p>3</p> <p>4 (Whereupon, a discussion was held</p> <p>5 off the record.)</p> <p>6</p> <p>7 Q. (BY MS. MESSICK) Are there any</p> <p>8 issues that you think the Republican Party is</p> <p>9 right about? Like, I know you don't</p> <p>10 generally vote Republican. But do you think,</p> <p>11 you know, actually, I agree with them on gun</p> <p>12 control or I agree with them on immigration</p> <p>13 or anything at all?</p> <p>14 MS. JASRASARIA: Objection.</p> <p>15 Form.</p> <p>16 You can answer.</p> <p>17 A. And, you know -- and there's</p> <p>18 always similarities, okay? So, I'm not</p> <p>19 saying that the Republican Party is far right</p> <p>20 than -- and Democrat is always far left, but</p> <p>21 I think there are some issues that meets</p> <p>22 right in the center that benefit both sides,</p> <p>23 okay? And depending on what is on the ballot</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 113</p> <p>1 something that may be -- have to be elected</p> <p>2 and things of that nature. I say I won't get</p> <p>3 that deep involved, but you never know.</p> <p>4 Q. Okay. Is there any office that</p> <p>5 you're currently considering running for --</p> <p>6 A. No.</p> <p>7 Q. -- in the future?</p> <p>8 Have you ever helped any</p> <p>9 candidates who are running for office with</p> <p>10 their campaigns?</p> <p>11 A. Other than passing out some</p> <p>12 ballots and putting some signs in some yards.</p> <p>13 Q. Who did you put out signs for?</p> <p>14 A. You know, this is a long time</p> <p>15 ago, and I probably can't even tell you. But</p> <p>16 I okayed for them to put some -- put some</p> <p>17 signs in the yards for Mr. Reed. They put</p> <p>18 some signs --</p> <p>19 Q. Mayor Steven Reed?</p> <p>20 A. Mayor Steven Reed, yeah. Uh-huh.</p> <p>21 Q. Are you saying that you put signs</p> <p>22 in yards or you --</p> <p>23 A. No.</p> <p>24</p> <p>25</p>

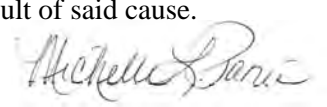
<p style="text-align: right;">Page 114</p> <p>1 Q. -- let them put their sign?</p> <p>2 A. They wanted to put some signs in</p> <p>3 my yard. And they wanted to put some -- so,</p> <p>4 I told them they can.</p> <p>5 Q. Okay. Have you ever put</p> <p>6 candidate signs in other people's yards?</p> <p>7 A. No, I have -- no, I haven't.</p> <p>8 Q. And what do you mean -- you said</p> <p>9 that you helped pass out ballots?</p> <p>10 A. Yeah. It was a friend of mine</p> <p>11 that was passing out some ballots one time.</p> <p>12 And I helped him put some -- put some -- it's</p> <p>13 literature, not ballots.</p> <p>14 Q. Okay.</p> <p>15 A. Yeah, just, you know,</p> <p>16 advertisement.</p> <p>17 Q. Okay.</p> <p>18 A. Yeah.</p> <p>19 Q. Flyers kind of --</p> <p>20 A. Flyers.</p> <p>21 Q. -- things?</p> <p>22 A. Yeah. Yeah, yeah, yeah. Not --</p> <p>23 Q. Things that you leave on doors?</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 116</p> <p>1 A. Okay.</p> <p>2 Q. -- Democrats --</p> <p>3 A. Okay. Okay.</p> <p>4 Q. -- but the leaders of the Alabama</p> <p>5 Democratic Party.</p> <p>6 A. No, I don't. No, I don't.</p> <p>7 Q. Are you aware of any leadership</p> <p>8 struggles that the Alabama Democratic Party</p> <p>9 has had in recent years?</p> <p>10 A. Not specifically, no.</p> <p>11 Q. Do you know if the Alabama</p> <p>12 Democrats are doing a good job of fielding</p> <p>13 candidates for office?</p> <p>14 MS. JASRASARIA: Objection.</p> <p>15 Form.</p> <p>16 You can answer.</p> <p>17 A. No.</p> <p>18 Q. (BY MS. MESSICK) Are you aware</p> <p>19 that in 2022, there were elections for state</p> <p>20 offices where the Libertarian Party had</p> <p>21 candidates but the Democrats didn't?</p> <p>22 MS. JASRASARIA: Objection.</p> <p>23 Form.</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 115</p> <p>1 A. Right, right, on doors and things</p> <p>2 of that nature, yeah.</p> <p>3 Q. Okay. Do you remember what</p> <p>4 candidates you did that for?</p> <p>5 A. Like I said, it was a long time</p> <p>6 ago.</p> <p>7 Q. Okay. Do you know who the</p> <p>8 current leaders of the Alabama Democratic</p> <p>9 Party are?</p> <p>10 A. Current leaders, talking about</p> <p>11 here locally?</p> <p>12 Q. Locally in Montgomery or</p> <p>13 statewide.</p> <p>14 A. Starting with what, the mayor or</p> <p>15 what?</p> <p>16 Q. No, the leaders of the party,</p> <p>17 not --</p> <p>18 A. Oh, okay.</p> <p>19 Q. -- not elected --</p> <p>20 A. Okay.</p> <p>21 Q. -- officials --</p> <p>22 A. Okay.</p> <p>23 Q. -- who are --</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 117</p> <p>1 You can answer.</p> <p>2 A. It seems like I read something on</p> <p>3 that, but, no.</p> <p>4 Q. (BY MS. MESSICK) Do you know who</p> <p>5 Yolanda Flowers is?</p> <p>6 A. Yolanda Flowers. I had heard</p> <p>7 that name, but, no, I don't. Who is she?</p> <p>8 Okay.</p> <p>9 Q. She may have done other things,</p> <p>10 but she ran for governor as a Democrat in</p> <p>11 2022.</p> <p>12 A. In 2022. Okay. I didn't -- I</p> <p>13 didn't vote for her. So --</p> <p>14 Q. You didn't vote for her?</p> <p>15 A. Well, you say she ran for -- she</p> <p>16 ran -- she was on the ballot?</p> <p>17 Q. Yeah, she ran for governor of</p> <p>18 Alabama in 2022 as a Democrat. And I thought</p> <p>19 you said you didn't vote for her.</p> <p>20 A. Well, the reason I say that</p> <p>21 because I -- if I had, I would have known.</p> <p>22 So, I didn't vote for her. If I would have</p> <p>23 known, I would have. I would know her if I</p> <p>24</p> <p>25</p>

<p style="text-align: right;">Page 118</p> <p>1 had voted for her. People that I do vote 2 for, most of the time you would ask me, I 3 would have said that, yeah, I voted for her 4 or something. 5 Q. Okay. You do better than me. 6 Sometimes I get in there and didn't realize 7 there was a particular race. 8 Do you know who Ruth Page-Nelson 9 is? 10 A. Who? 11 Q. Ruth Page-Nelson. 12 A. No. 13 Q. Okay. Do you know who Will Boyd 14 is? 15 A. Yeah, he ran for an office, too. 16 For what, I can't tell you. But he was on 17 the -- on the ballot box. 18 Q. Okay. 19 A. Can I ask a question? And, you 20 know, if I had -- if I had -- if I was going 21 to -- I don't see where this relates to what 22 we're -- what we're doing here. I did take 23 off work today to come here -- this morning 24 25</p>	<p style="text-align: right;">Page 120</p> <p>1 Democrats are voting for, whatever. And you 2 may have two different parties. 3 But -- and I think sometime 4 because we're not -- don't know all these 5 people, some of them, you hadn't even heard 6 of them, hadn't -- some of them, you hadn't 7 even seen commercials on them or anything. 8 And so, sometimes we -- sometime we go by 9 party, sometime we kind of ease -- go around, 10 this person doesn't -- and then, out of the 11 party and then back into, you know. 12 So, I think in going forward, I 13 have promised myself to be more knowledgeable 14 about the voting process. 15 Q. Do you know whether it is true in 16 Alabama today that Black voters tend to 17 prefer Democratic candidates? 18 A. Do I know whether that's true? 19 Q. Yes, sir. 20 A. Well, I don't know whether that 21 is true or not, but I would say that it's 22 more likely is. 23 Q. Okay. Do you know if it's true 24 25</p>
<p style="text-align: right;">Page 119</p> <p>1 to come here, you know. And I thought we was 2 going to be discussing things that was 3 interests -- well, that was part of it. 4 Q. I appreciate that and I 5 appreciate you being here. I'm not going to 6 take the time to explain why I think it's 7 relevant. But I will tell you that I think 8 we're going to be done shortly. 9 A. All right. 10 Q. In the last ten years, have you 11 wanted to be more politically engaged with 12 the Democratic Party and felt like you were 13 prohibited from doing that in any way? 14 A. No, I wasn't prohibited, but I 15 think in the last ten years, the older you 16 get, you become more aware or conscious as to 17 who you vote for and why. And I think I had 18 promised myself to be more -- have more 19 knowledge of who I give my votes to and why, 20 what they actually are doing. I think a lot 21 of times, we get caught up on a party, and 22 sometime they give you a ballot to -- a flyer 23 or something, Democratic, this is who 24 25</p>	<p style="text-align: right;">Page 121</p> <p>1 that nationally, Black voters tend to prefer 2 Democrats? 3 A. Again, that'll be the same thing. 4 I will say yeah. 5 Q. There's been a lot of news in the 6 political election lately. And I'm sure you 7 know that Kamala Harris is looking like she's 8 going to be the Democratic candidate. Do you 9 think that she'll get a different reception 10 in Alabama than Joe Biden would have? 11 MS. JASRASARIA: Objection to 12 form. 13 You can answer. 14 A. Well, a hour or three hours or 15 something, they say raised one point five 16 million women, you know, they had some and 17 they -- 18 Q. (BY MS. MESSICK) You're talking 19 about that she's raised a lot of money very 20 quickly? 21 A. Well, I'm just saying during that 22 time, they announced it during that day, they 23 had something like an hour, I think, so many 24 25</p>

<p style="text-align: right;">Page 122</p> <p>1 Black women, they raised one point five 2 million dollars. That was on the news, okay? 3 And then, I've been reading some 4 info that they're saying that apparently she 5 have rekindled fire among younger voters. 6 Whether she -- you know -- women is -- you 7 know, if I'm not mistaken, women kind of 8 out -- probably outnumber mens, you know. I 9 know in Atlanta, Georgia, something like six 10 to one than in other places, you know. 11 That's where I was reading info. Now, 12 whether it's true or not, there's been about 13 a year ago saying women outnumber men six to 14 one in Atlanta, Georgia. 15 But I'd say that in Alabama, I'm 16 not sure whether womens outnumber -- so, when 17 you talk about Pamela Harris, if she can get 18 the womens behind her, if those numbers carry 19 any weight or anything, she could do pretty 20 good if she get that party being that -- you 21 know, that party behind her. 22 Q. You mentioned Mayor Steven Reed 23 earlier. He's the mayor of Montgomery, 24 25</p>	<p style="text-align: right;">Page 124</p> <p>1 Q. Okay. 2 A. I don't keep up with politics. 3 That's what I -- 4 Q. Do you know who your county 5 commissioner is? 6 A. I do, but I couldn't tell you. I 7 know of him, but I couldn't tell you. 8 Q. Okay. Have you ever -- 9 A. If I needed to go -- do you know 10 what I do when I get ready to contact 11 someone, I go out to search engine, put 12 the -- what it is I need and who I need to 13 talk to, and they bring up -- it'll bring up 14 some names or something. And me with names 15 and who is in a certain position, that's my 16 weakness where I promised myself I need to be 17 stronger. But we can be talking there in 18 deacon meeting and there will be some names, 19 and they would ask me like I know. I say -- 20 and I tell them, I have to -- you know -- I 21 don't keep up with that. 22 Q. Okay. 23 A. Yeah. 24 25</p>
<p style="text-align: right;">Page 123</p> <p>1 right? 2 A. Uh-huh. 3 Q. And what race is he? 4 A. He's Black. 5 Q. Do you know who your state 6 senator is? Not U.S. senator, not Tommy 7 Tuberville, not Katie Britt. But in the 8 Alabama State Senate, do you know who 9 represents you? 10 A. Is it -- is it not Terri? It's 11 not Ms. Sewell? 12 Q. No. She represents -- she's in 13 the United States Congress in the House of 14 Representatives for District 7. 15 A. Okay. 16 Q. So, I'm sure you know that just 17 like you have the Congress for the Federal 18 Government, we have a state legislature -- 19 A. Uh-huh. 20 Q. -- that -- 21 A. But I don't know -- I don't know 22 him offhand. My wife would know all that 23 stuff. I don't -- I don't -- 24 25</p>	<p style="text-align: right;">Page 125</p> <p>1 Q. So, you don't know who it is 2 offhand, but you could find them if you 3 needed them? 4 A. I could find them if I needed 5 them. 6 Q. Have you reached out to your 7 county commissioner any time in the last -- 8 A. Never had to. 9 Q. -- ten years? 10 A. Didn't have to. 11 Q. Okay. What about city council 12 member; have you reached out to them for 13 anything? 14 A. I haven't had to. 15 Q. Okay. So, a lot of white voters 16 in Alabama vote for Republicans; would you 17 agree that that's true? 18 A. A lot of white voters in Alabama 19 vote for Republicans; is that what you said? 20 Q. Yes. 21 A. Yes. 22 Q. Do you know why a lot of white 23 voters support Republicans? 24 25</p>

<p style="text-align: right;">Page 126</p> <p>1 MS. JASRASARIA: Objection. 2 Form. 3 A. No, I do not know why. My answer 4 would definitely be way out in left field. 5 So, no, I don't know why. 6 Q. (BY MS. MESSICK) Okay. You'd 7 have to speculate -- 8 A. Yes. 9 Q. -- is what you're saying? 10 Okay. Did you experience 11 discrimination growing up in Alabama? 12 A. I did. 13 Q. Would you agree that things are 14 very different today? 15 MS. JASRASARIA: Objection. 16 Form. 17 You can answer. 18 A. I think it's covered up, but I 19 think discrimination is still alive and well. 20 Q. (BY MS. MESSICK) Okay. Why do 21 you say that? 22 A. Well, you will have to be a Black 23 person going to different places, soliciting 24 25</p>	<p style="text-align: right;">Page 128</p> <p>1 person. The dude got up, went out there, 2 pumped his gas. I was there first. I was 3 invisible. 4 Q. Did he come and pump yours next 5 or -- 6 A. No. 7 Q. -- he just ignored you? 8 A. No. But you know what I did? 9 Cranked my car up and went to another service 10 station. Now, you would say no words was 11 exchanged basically or nothing, but it's 12 the -- it's the -- it's the poison of the 13 atmosphere, okay? And so, things like that, 14 I don't have to spend my money. I'll go 15 someplace where I'm welcome, you know. 16 Q. Yeah. 17 A. So -- 18 Q. Is an experience like that common 19 or rare for you? 20 A. I think in some rural areas you 21 go, sometime it's still there. 22 Q. Okay. Do you experience that a 23 lot in Montgomery -- 24 25</p>
<p style="text-align: right;">Page 127</p> <p>1 some of the stores and the interaction with 2 certain people that basically, you know, 3 refuse to treat you equally or treat you 4 different than they do your white 5 counterpart. And so, you can see it. 6 It's -- I don't know whether 7 it's stereotyping. I don't know whether it's 8 upbringing. But you still have people 9 calling the N word. And you still have -- 10 it's still there. I mean, you're asking me 11 to be -- and I'll leave that right there 12 because -- I'll leave that right there. 13 Q. Can you give me any examples of 14 times that you've experienced discrimination 15 in Alabama in the last twenty years? 16 A. Twenty years? 17 Q. (Counsel nods head.) 18 A. I was on my way to Mobile, went 19 into a full service service station. The guy 20 was in there. I was going to -- I was going 21 to really pump my own gas. But it says full 22 service. So, I went in. They were sitting 23 down. And another car pulled up, white 24 25</p>	<p style="text-align: right;">Page 129</p> <p>1 A. No. 2 Q. -- County? 3 A. No, no, no. It's not a lot. 4 It's not a lot, but it's still there. 5 Q. Okay. Are there things that you 6 think I should have asked you today? You 7 indicated before you thought I was asking you 8 about the wrong stuff. 9 A. I didn't think -- I think you 10 asked too much today, but, no, there's 11 nothing I think you should have asked me 12 today. 13 Q. Okay. So, I didn't miss 14 anything; I just asked too much in your view? 15 A. I don't think you did. Maybe -- 16 no, I'm not -- I'm not going to even season 17 you with anything because, then, we'll be 18 here another hour. 19 Q. So, there will be a trial in this 20 case in February. And your lawyers might 21 call you to testify to help the court 22 understand why your side believes that the 23 court should give you relief. Are there 24 25</p>

<p style="text-align: right;">Page 130</p> <p>1 things that you can think of as you sit here 2 now that you would want the court to know 3 that we haven't already talked about? 4 MS. JASRASARIA: Objection. 5 Form. 6 You can answer. 7 A. And I don't think there's 8 anything new that's not already been 9 discussed in the court case. So, my idea 10 would be as it is that -- you know, to 11 give those areas more leverage to select 12 people that will actually be sincere in 13 representing their interest. So, all that 14 is -- that's the reason that I think all of 15 that is stated in these -- what you call 16 these -- case files. 17 Q. Okay. Did you experience 18 discrimination when you were in the army? 19 A. I think -- I think back then, I 20 think majority of Black people did. However, 21 I was -- in basic training -- I went through 22 basic training with a person that had 23 never -- let him -- let them tell it -- had 24 25</p>	<p style="text-align: right;">Page 132</p> <p>1 Q. Okay. 2 A. So, it would have been like a 3 active person assigned to a guard unit. So, 4 I was active. 5 Q. Okay. 6 A. Uh-huh. 7 Q. Did you experience discrimination 8 when you were active Air National Guard? 9 A. I was passed over a promotion 10 because I knew it was discrimination, okay? 11 Because Air National Guard, they have a lot 12 of son, fathers, brothers, okay? And so -- 13 cousins and stuff, you know. 14 Q. Like people getting promoted 15 based on who they know; is that what you're 16 saying? 17 A. Well, people getting not 18 necessarily -- you don't get promoted 19 because -- well, yeah, they favor those. 20 They'll give you a higher APR. So, that 21 would do it right there. But they just had 22 more support, more pull. And a lot of time, 23 they got a better APR and stuff, then, they 24 25</p>
<p style="text-align: right;">Page 131</p> <p>1 never seen or had any encounter with a Black 2 person. Okay. They was less discriminative 3 than people that had been raised up with 4 Black people, okay? 5 Q. Okay. 6 A. So, I think we all do. If -- you 7 have to almost be extra to sometimes succeed. 8 You used to. Now, military has changed quite 9 a bit. So, that would be something that 10 would be hard to find now, I think, okay? 11 So -- but back then -- 12 Q. What years approximately were you 13 in the army? 14 A. I went in the army in August '74 15 through August '78. 16 Q. Okay. And then, when you were in 17 the Air National Guard, that was the sort of 18 thing where you're not in there full time, 19 you're living in Montgomery -- 20 A. I was -- 21 Q. -- doing a job? 22 A. -- AGR. 23 I was active guard reserve. 24 25</p>	<p style="text-align: right;">Page 133</p> <p>1 could pass you over and go to another person, 2 you know. 3 Q. What's an APR? 4 A. Annual appraisal report. 5 Q. Okay. Okay. 6 A. Yeah. 7 MS. MESSICK: Could we take just 8 two minutes? 9 10 (Whereupon, a brief recess was 11 taken.) 12 13 MS. MESSICK: We're back on the 14 record. 15 I do not have any further 16 questions for you, Mr. Powell. Your lawyer 17 may or may not have questions for you. 18 MS. JASRASARIA: No questions for 19 me, Mr. Powell. Thank you so much for your 20 time today. 21 MS. MESSICK: Yes, thank you for 22 your time. 23 THE WITNESS: You're welcome. 24 25</p>

<p style="text-align: right;">Page 134</p> <p>1 MS. MESSICK: Off the record and</p> <p>2 done.</p> <p>3 FURTHER DEPONENT SAITH NOT.</p> <p>4</p> <p>5</p> <p>6</p> <p>7</p> <p>8</p> <p>9</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</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 136</p> <p>1 To: Jyoti Jasrasaria, Esq.</p> <p>Re: Signature of Deponent Manasseh Powell</p> <p>2 Date Errata due back at our offices: 30 days</p> <p>3 Greetings:</p> <p>This deposition has been requested for read and sign by</p> <p>4 the deponent. It is the deponent's responsibility to</p> <p>review the transcript, noting any changes or corrections</p> <p>5 on the attached PDF Errata. The deponent may fill</p> <p>out the Errata electronically or print and fill out</p> <p>6 manually.</p> <p>7 Once the Errata is signed by the deponent and notarized,</p> <p>8 please mail it to the offices of Veritext (below).</p> <p>9</p> <p>10 When the signed Errata is returned to us, we will seal</p> <p>11 and forward to the taking attorney to file with the</p> <p>12 original transcript. We will also send copies of the</p> <p>13 Errata to all ordering parties.</p> <p>14</p> <p>15 If the signed Errata is not returned within the time</p> <p>16 above, the original transcript may be filed with the</p> <p>17 court without the signature of the deponent.</p> <p>18</p> <p>19 Please Email the completed errata/witness cert page</p> <p>20 to CS-SOUTHEAST@VERITEXT.COM</p> <p>21 or mail to</p> <p>22 Veritext Production Facility</p> <p>23 2000A Southbridge Parkway, Suite 400</p> <p>24 Birmingham, AL 35209</p> <p>25 800-808-4958</p>
<p style="text-align: right;">Page 135</p> <p>1 C E R T I F I C A T E</p> <p>2</p> <p>3 STATE OF ALABAMA)</p> <p>4 JEFFERSON COUNTY)</p> <p>5 I hereby certify that the above</p> <p>6 and foregoing deposition was taken down by me</p> <p>7 in stenotype, and the questions and answers</p> <p>8 thereto were transcribed by means of</p> <p>9 computer-aided transcription, and that the</p> <p>10 foregoing represents a true and correct</p> <p>11 transcript of the testimony given by said</p> <p>12 witness upon said hearing.</p> <p>13 I further certify that I am</p> <p>14 neither of counsel, nor of kin to the parties</p> <p>15 to the action, nor am I an anywise interested</p> <p>16 in the result of said cause.</p> <p>17 </p> <p>18 MICHELLE L. PARVIN</p> <p>19 Certified Court Reporter</p> <p>20 License Number 126</p> <p>21 Commission expires 9/30/24</p> <p>22 Notary Public expires 1/26/26</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 137</p> <p>1 ERRATA for ASSIGNMENT #6790048</p> <p>I, the undersigned, do hereby certify that I have read the</p> <p>2 transcript of my testimony, and that</p> <p>3 <input type="checkbox"/> There are no changes noted.</p> <p><input type="checkbox"/> The following changes are noted:</p> <p>4</p> <p>5 Pursuant to Civil Procedure, Rule 30. ALA. CODE § 5-30(e)</p> <p>6 (2017). Rule 30(e) states any changes in form or</p> <p>7 substance which you desire to make to your testimony shall</p> <p>8 be entered upon the deposition with a statement of the</p> <p>9 reasons given for making them. To assist you in making any</p> <p>10 such corrections, please use the form below. If additional</p> <p>11 pages are necessary, please furnish same and attach.</p> <p>12</p> <p>13 Page ____ Line ____ Change _____</p> <p>14 _____</p> <p>15 Reason for change _____</p> <p>16 Page ____ Line ____ Change _____</p> <p>17 _____</p> <p>18 Reason for change _____</p> <p>19 Page ____ Line ____ Change _____</p> <p>20 _____</p> <p>21 Reason for change _____</p> <p>22 Page ____ Line ____ Change _____</p> <p>23 _____</p> <p>24 Reason for change _____</p> <p>25 Page ____ Line ____ Change _____</p>

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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate.

The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS

COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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