

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.

<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, by</p> <p>12 and between the parties through their</p> <p>13 respective counsel, that the deposition of</p> <p>14 RODNEY ALLEN LOVE may be taken before</p> <p>15 Michelle L. Parvin, Commissioner, at the</p> <p>16 offices of Balch &amp; Bingham, 1901 Sixth Avenue</p> <p>17 North, Suite 1500, Birmingham, Alabama,</p> <p>18 35203, on the 7th day of August, 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 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 Mr. Mauldin 9</p> <p>5 Mr. Taunton 93</p> <p>6 Ms. Rutahindurwa 99</p> <p>7 Mr. Taunton 100</p> <p>8</p> <p>9 DEFENDANT'S EXHIBITS:</p> <p>10 Exhibit 1 28</p> <p>11 Complaint For Declaratory and</p> <p>12 Injunctive Relief</p> <p>13 Exhibit 2 32</p> <p>14 First Amended Complaint For Declaratory</p> <p>15 and Injunctive Relief</p> <p>16 Exhibit 3 43</p> <p>17 Act 2021-555 map &amp; VRA Plaintiffs</p> <p>18 Remedial Map</p> <p>19 Exhibit 4 54</p> <p>20 Livingston Congressional Plan 3-2023</p> <p>21 Remedial Plan 1</p> <p>22</p> <p>23</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 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 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. Makeba</p> <p>16 Rutahindurwa, 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 Mr. Dylan L. Mauldin, Mr.</p> <p>21 Richard D. Mink, and Mr. Robert M. Overing,</p> <p>22 501 Washington Avenue, Montgomery, Alabama,</p> <p>23 36104, appearing on behalf of Defendant</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 1901 Sixth</p> <p>8 Avenue North, Suite 1500, Birmingham,</p> <p>9 Alabama, 35203, beginning at 9:01 a.m.,</p> <p>10 RODNEY ALLEN LOVE, witness in the above</p> <p>11 cause, for oral examination, whereupon the</p> <p>12 following proceedings were had:</p> <p>13</p> <p>14 RODNEY ALLEN LOVE,</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 MR. MAULDIN: Yes.</p> <p>21 MS. RUTAHINDURWA: Yes, except</p> <p>22 we'll read and sign.</p> <p>23</p>
<p style="text-align: right;">Page 7</p> <p>1 Secretary Wes Allen.</p> <p>2 BALCH &amp; BINGHAM, LLP, by Mr.</p> <p>3 Michael P. Taunton, 1901 Sixth Avenue North,</p> <p>4 Suite 1500, Birmingham, Alabama, 35203,</p> <p>5 appearing on behalf of Defendants</p> <p>6 Representative Chris Pringle and Senator</p> <p>7 Steven Livingston.</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 style="text-align: right;">Page 9</p> <p>1 EXAMINATION BY MR. MAULDIN:</p> <p>2</p> <p>3 Q. All right. Good morning. My</p> <p>4 name is Dylan Mauldin. I represent the</p> <p>5 Alabama Secretary of State, Wes Allen, in the</p> <p>6 congressional redistricting lawsuit you've</p> <p>7 filed.</p> <p>8 A. Uh-huh.</p> <p>9 Q. This deposition is an opportunity</p> <p>10 for us to understand your testimony in this</p> <p>11 matter. I'll be asking you questions, and</p> <p>12 you will answer under oath. Do you</p> <p>13 understand that?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. This conversation has</p> <p>16 different rules from a normal conversation.</p> <p>17 There's a court reporter here, and she'll be</p> <p>18 creating a transcript of everything that is</p> <p>19 said.</p> <p>20 A. Okay.</p> <p>21 Q. Because we need her to create an</p> <p>22 accurate transcript, it's important that we</p> <p>23 don't speak over each other. I will wait to</p>

<p style="text-align: right;">Page 10</p> <p>1 speak until you have finished and if you will</p> <p>2 wait to answer until I have finished my</p> <p>3 question, it'll help the court reporter and</p> <p>4 it will help ensure you're answering the</p> <p>5 question that I'm asking. Will you do that?</p> <p>6 A. Yes.</p> <p>7 Q. Thank you. Similarly, it is</p> <p>8 important that you answer questions audibly</p> <p>9 rather than solely by shaking your head or</p> <p>10 more of an informal uh-huh or an huh-uh.</p> <p>11 Those things are hard for the court reporter</p> <p>12 to reliably take down. So, will you clearly</p> <p>13 speak your answers?</p> <p>14 A. Yes.</p> <p>15 Q. If you do not understand a</p> <p>16 question, please let me know and I'll try to</p> <p>17 ask it again so we can stay on the same page.</p> <p>18 Will you do that?</p> <p>19 A. Yes.</p> <p>20 Q. Sometimes the witness gets an</p> <p>21 answer and then later in the deposition</p> <p>22 realizes that he or she forgot something or</p> <p>23 misspoke. If you need to add to or correct</p>	<p style="text-align: right;">Page 12</p> <p>1 testimony here today?</p> <p>2 A. No.</p> <p>3 Q. Okay. Do you have any questions</p> <p>4 about the process before we begin?</p> <p>5 A. No, I do not.</p> <p>6 Q. All right. Please state your</p> <p>7 name for the record.</p> <p>8 A. Rodney Love.</p> <p>9 Q. All right. Before this case,</p> <p>10 have you been involved in any litigation?</p> <p>11 A. Have I been involved who?</p> <p>12 Q. In any litigation --</p> <p>13 A. Oh, no.</p> <p>14 Q. -- before this case.</p> <p>15 A. Oh, yes. Yes, I have.</p> <p>16 Q. Can you explain that litigation,</p> <p>17 please?</p> <p>18 A. Yes. I was involved with the</p> <p>19 2019 case. I mean, the same case, but it's</p> <p>20 just been prolonged.</p> <p>21 Q. Okay. So, are you talking about</p> <p>22 when -- in 2021 when that map was originally</p> <p>23 changed or --</p>
<p style="text-align: right;">Page 11</p> <p>1 any of your testimony during the course of</p> <p>2 this deposition, please let me or your</p> <p>3 counsel know. Will you do that?</p> <p>4 A. Yes.</p> <p>5 Q. Your counsel may object from time</p> <p>6 to time. Often, the objection is to the form</p> <p>7 of the question. When that happens, counsel</p> <p>8 is making a record, but you are still</p> <p>9 required to answer that question. If counsel</p> <p>10 has some other objection and thinks you</p> <p>11 should not answer, she'll make that clear.</p> <p>12 But if the objection is just to the form of</p> <p>13 the question, you still answer. Do you</p> <p>14 understand?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. We will occasionally take</p> <p>17 breaks. If you need a break, please let me</p> <p>18 know. If there is a question pending, I'll</p> <p>19 need you to answer that question before we</p> <p>20 break.</p> <p>21 Is there any reason, including</p> <p>22 medications or medical conditions, that you</p> <p>23 cannot provide complete and truthful</p>	<p style="text-align: right;">Page 13</p> <p>1 A. Yes. Well, it started in 2 --</p> <p>2 didn't it start in 2019?</p> <p>3 MS. RUTAHINDURWA: It's Chestnut</p> <p>4 V. Merrill.</p> <p>5 MR. MAULDIN: Okay. Yeah. All</p> <p>6 right. Thank you.</p> <p>7 Q. And so, you were a plaintiff in</p> <p>8 that case?</p> <p>9 A. Yes.</p> <p>10 Q. And have you been involved in any</p> <p>11 litigation before that?</p> <p>12 A. No.</p> <p>13 Q. Okay. Were you deposed in that</p> <p>14 case, in the Chestnut V. Merrill case?</p> <p>15 A. No.</p> <p>16 Q. Okay. Did you testify in court</p> <p>17 in that case?</p> <p>18 A. No, I did not.</p> <p>19 Q. Okay. So, have you ever been</p> <p>20 deposed before today at all?</p> <p>21 A. No.</p> <p>22 Q. And you've never testified before</p> <p>23 in court?</p>

<p style="text-align: right;">Page 14</p> <p>1 A. No.</p> <p>2 Q. Have you ever testified under</p> <p>3 oath in any setting?</p> <p>4 A. No.</p> <p>5 Q. Okay. So, what did you do to</p> <p>6 prepare for this deposition?</p> <p>7 A. What did I do to prepare?</p> <p>8 Q. Yes.</p> <p>9 A. I met with my lawyer probably</p> <p>10 about three times.</p> <p>11 Q. Okay. And is your attorney the</p> <p>12 only person you spoke with about this</p> <p>13 deposition?</p> <p>14 A. Yes.</p> <p>15 Q. Okay. So, there were no</p> <p>16 additional conversations?</p> <p>17 A. No.</p> <p>18 Q. Okay. Did you look at the maps</p> <p>19 in preparation for the deposition?</p> <p>20 A. No, I did not.</p> <p>21 Q. Did you look at any other</p> <p>22 documents?</p> <p>23 A. Yes.</p>	<p style="text-align: right;">Page 16</p> <p>1 my younger age, I was in Mobile. I was born</p> <p>2 in Mobile.</p> <p>3 Q. Okay. And how long have you</p> <p>4 lived at your current address?</p> <p>5 A. Hold on. It's going on fifteen</p> <p>6 years now.</p> <p>7 Q. Okay. And where did you live</p> <p>8 before that?</p> <p>9 A. I stayed with my -- well, I</p> <p>10 stayed in an apartment, and then, I stayed</p> <p>11 with my mother before then.</p> <p>12 Q. And that was in Birmingham as</p> <p>13 well?</p> <p>14 A. Yes.</p> <p>15 Q. And you said you were raised in</p> <p>16 Mobile?</p> <p>17 A. Yes.</p> <p>18 Q. And other than Birmingham and</p> <p>19 Mobile, have you lived anywhere else in</p> <p>20 Alabama?</p> <p>21 A. No.</p> <p>22 Q. Have you ever lived outside of</p> <p>23 Alabama?</p>
<p style="text-align: right;">Page 15</p> <p>1 Q. Which ones?</p> <p>2 A. Everything about the case that</p> <p>3 was going on about the case and basically</p> <p>4 through emails and everything.</p> <p>5 Q. Okay. And did you bring any</p> <p>6 documents with you here today?</p> <p>7 A. No, I did not. All of them are</p> <p>8 on the emails.</p> <p>9 Q. All right. And what year were</p> <p>10 you born?</p> <p>11 A. 1985.</p> <p>12 Q. And what is your address?</p> <p>13 A. 1539 Martin Avenue, Birmingham,</p> <p>14 Alabama, ZIP Code 35208.</p> <p>15 Q. And what county is that in?</p> <p>16 A. Jefferson.</p> <p>17 Q. And have you ever resided</p> <p>18 anywhere else --</p> <p>19 A. No.</p> <p>20 Q. -- besides Birmingham?</p> <p>21 So, you've lived in Birmingham</p> <p>22 your whole life?</p> <p>23 A. Not my whole life. Probably --</p>	<p style="text-align: right;">Page 17</p> <p>1 A. No.</p> <p>2 Q. And did you graduate from high</p> <p>3 school?</p> <p>4 A. Yes.</p> <p>5 Q. Which high school is that?</p> <p>6 A. Midfield High.</p> <p>7 Q. What was that?</p> <p>8 A. Midfield High.</p> <p>9 Q. Okay. And what municipality is</p> <p>10 that in?</p> <p>11 A. County? Jefferson.</p> <p>12 Q. And let's back up real quick.</p> <p>13 When did you move from Mobile to Birmingham?</p> <p>14 A. Basically, I was about four.</p> <p>15 Q. Okay.</p> <p>16 A. Four or five.</p> <p>17 Q. That would have been around 1990?</p> <p>18 A. No. 1984 to be exact.</p> <p>19 Q. Okay. What year did you say you</p> <p>20 were born?</p> <p>21 A. 1985.</p> <p>22 Q. Okay. And you said what year did</p> <p>23 you move to Mobile?</p>

<p style="text-align: right;">Page 18</p> <p>1 A. Birmingham? Birmingham?</p> <p>2 Q. To Birmingham, yes.</p> <p>3 A. 1984. I mean, '89. My bad.</p> <p>4 Q. Okay. Okay.</p> <p>5 A. I'm sorry. I'm sorry.</p> <p>6 Q. I was a little confused for a</p> <p>7 second.</p> <p>8 So, you said you attended high</p> <p>9 school in Birmingham?</p> <p>10 A. Birmingham, yes.</p> <p>11 Q. What year did you graduate?</p> <p>12 A. 2003.</p> <p>13 Q. Did you attend college?</p> <p>14 A. No, I did not.</p> <p>15 Q. Did you do any type of schooling</p> <p>16 after high school?</p> <p>17 A. No.</p> <p>18 Q. So, are you married?</p> <p>19 A. No. Single.</p> <p>20 Q. Have you ever been married?</p> <p>21 A. No.</p> <p>22 Q. Do you have any kids?</p> <p>23 A. No.</p>	<p style="text-align: right;">Page 20</p> <p>1 Q. Okay.</p> <p>2 A. I forgot the name of the temp</p> <p>3 service, though, that I worked for.</p> <p>4 Q. And how long have you been at</p> <p>5 your current employer?</p> <p>6 A. It's going on eighteen years.</p> <p>7 Q. Okay. Are you currently a member</p> <p>8 of any professional organizations?</p> <p>9 A. Yes. I was -- I'm with the</p> <p>10 union.</p> <p>11 Q. All right. And what union is</p> <p>12 that?</p> <p>13 A. Local 2140.</p> <p>14 Q. Is that the only professional</p> <p>15 organization?</p> <p>16 A. Yes.</p> <p>17 Q. Okay. And what do you do as a</p> <p>18 member of that organization?</p> <p>19 A. Well, I was the vice president</p> <p>20 until I got voted out, but, now, I'm just a</p> <p>21 member.</p> <p>22 Q. Okay. And when did that happen?</p> <p>23 A. When what happened, when I was</p>
<p style="text-align: right;">Page 19</p> <p>1 Q. So, are you currently employed?</p> <p>2 A. Yes.</p> <p>3 Q. Where at?</p> <p>4 A. U.S. Pipe.</p> <p>5 Q. What was that?</p> <p>6 A. U.S. Pipe.</p> <p>7 Q. All right.</p> <p>8 A. It's a foundry.</p> <p>9 Q. Okay. And is that here in</p> <p>10 Birmingham?</p> <p>11 A. It's in Bessemer.</p> <p>12 Q. Bessemer. Okay.</p> <p>13 What did you do before that?</p> <p>14 A. I worked at a warehouse, CVS</p> <p>15 warehouse.</p> <p>16 Q. And was that in Bessemer or</p> <p>17 Birmingham?</p> <p>18 A. Yes, Bessemer.</p> <p>19 Q. Okay. And before that?</p> <p>20 A. Before that, probably a couple of</p> <p>21 temp jobs. I was on a temp service,</p> <p>22 basically. I worked at a place -- a</p> <p>23 warehouse called Office Max.</p>	<p style="text-align: right;">Page 21</p> <p>1 vice president?</p> <p>2 Q. When you were -- when you were</p> <p>3 voted out as vice president.</p> <p>4 A. Oh, voted out. It was probably</p> <p>5 about a good four or five years ago.</p> <p>6 Q. Okay. And how long did you serve</p> <p>7 in that role?</p> <p>8 A. Two years.</p> <p>9 Q. Okay. And what were your duties</p> <p>10 as vice president?</p> <p>11 A. Basically, handle all business</p> <p>12 and basically grievance and -- anything that</p> <p>13 the president couldn't handle at the time, he</p> <p>14 sent around, basically.</p> <p>15 Q. And was there anything political,</p> <p>16 any politically-related duties?</p> <p>17 A. No, nothing but grievance and</p> <p>18 basically saving folks' jobs. That's it.</p> <p>19 Q. Okay. Is that the only</p> <p>20 professional organization? I believe you</p> <p>21 said it was.</p> <p>22 A. Yes.</p> <p>23 Q. Are you a member of any civic</p>



<p style="text-align: right;">Page 22</p> <p>1 organizations?</p> <p>2 A. No.</p> <p>3 Q. Have you ever been in the past</p> <p>4 ten years a member of any civic</p> <p>5 organizations?</p> <p>6 A. No.</p> <p>7 Q. Do you have any social media</p> <p>8 accounts?</p> <p>9 A. Yes.</p> <p>10 Q. Which platforms?</p> <p>11 A. Facebook, Instagram, Snapchat,</p> <p>12 Twitter. Well, it's called X now. And</p> <p>13 that's about it.</p> <p>14 Q. So, for -- I'll run through this</p> <p>15 for each platform. Is your Facebook account</p> <p>16 public?</p> <p>17 A. Yes.</p> <p>18 Q. And how are you identified on</p> <p>19 that platform? Like, how would -- how would</p> <p>20 someone find you?</p> <p>21 A. Rodney Love.</p> <p>22 Q. All right. Is your Instagram</p> <p>23 account public?</p>	<p style="text-align: right;">Page 24</p> <p>1 Q. I'm sorry. Can you say that one</p> <p>2 more time?</p> <p>3 A. Ping car operator. Basically, I</p> <p>4 make the ping cavities in the molds that --</p> <p>5 Q. Okay.</p> <p>6 A. -- the designs on the pipe.</p> <p>7 Q. Okay. So, tell me a little bit</p> <p>8 more about that.</p> <p>9 A. What do you want to know?</p> <p>10 Q. I'm not sure.</p> <p>11 A. I mean, what it is, basically,</p> <p>12 when the molds -- basically, when they run</p> <p>13 the molds and we make the pipes out of the --</p> <p>14 out of the molds, basically, I go pick them</p> <p>15 up and I inspect them and make sure it's --</p> <p>16 well, make sure how we need to work them.</p> <p>17 And, basically, like if they have scars or</p> <p>18 anything or a damaged mold or a cracked mold,</p> <p>19 we can't use them. I'll either scrap them or</p> <p>20 I basically mark them, and we'll rework them.</p> <p>21 What I mean by rework is, basically, we will</p> <p>22 weld them up or we'll basically patch -- weld</p> <p>23 them up, patch, or we'll basically go in and</p>
<p style="text-align: right;">Page 23</p> <p>1 A. Yes.</p> <p>2 Q. And how are -- how are you</p> <p>3 identified on Instagram?</p> <p>4 A. Rodney Love.</p> <p>5 Q. And what about X; is it public?</p> <p>6 A. Yes.</p> <p>7 Q. And how are you identified on</p> <p>8 that platform as well?</p> <p>9 A. I think that's Rodney Love 19. I</p> <p>10 think it is.</p> <p>11 Q. All right. Have you posted about</p> <p>12 this litigation on any of your social media</p> <p>13 accounts?</p> <p>14 A. No, I have not.</p> <p>15 Q. And so, did you post about this</p> <p>16 deposition on any of your social media</p> <p>17 accounts?</p> <p>18 A. No.</p> <p>19 Q. All right. Let's talk a little</p> <p>20 bit about the pipe foundry. So, what do</p> <p>21 you -- what did you do there? Or what do you</p> <p>22 do there?</p> <p>23 A. I'm a ping car operator.</p>	<p style="text-align: right;">Page 25</p> <p>1 cut them and make them down to size.</p> <p>2 Basically, just -- basically, a mold</p> <p>3 basically where lava go in and you make pipe.</p> <p>4 Q. All right. And so, could you</p> <p>5 tell me in your own words what you understand</p> <p>6 this lawsuit to be about?</p> <p>7 A. What I understand what this</p> <p>8 lawsuit to be about?</p> <p>9 Q. Yeah.</p> <p>10 A. My own words, it's basically to</p> <p>11 help out my community and to help me -- well,</p> <p>12 not help me. Basically, help my community</p> <p>13 and everything around my neighborhood and</p> <p>14 everything else.</p> <p>15 Q. And so, how would this lawsuit do</p> <p>16 that?</p> <p>17 A. It would basically -- basically,</p> <p>18 give the voters more basically a chance to</p> <p>19 speak. And, basically, in my neighborhood,</p> <p>20 which is majority Black, is, basically, we'll</p> <p>21 have a voice in Congress.</p> <p>22 Q. Do you feel like you don't have a</p> <p>23 voice now?</p>

<p style="text-align: right;">Page 26</p> <p>1 A. I mean, not really.</p> <p>2 Q. All right. So, how did you get</p> <p>3 involved in this lawsuit?</p> <p>4 A. My union -- my district man --</p> <p>5 basically, my district man, Michael Smith, he</p> <p>6 introduced me to it.</p> <p>7</p> <p>8 (Whereupon, a discussion was held</p> <p>9 off the record.)</p> <p>10</p> <p>11 Q. (BY MR. MAULDIN) So, did you say</p> <p>12 that your district manager --</p> <p>13 A. Yeah, my district -- he's my</p> <p>14 district representative.</p> <p>15 Q. Representative. Okay.</p> <p>16 A. Yes.</p> <p>17 Q. And what was his name again?</p> <p>18 A. Michael Smith.</p> <p>19 Q. And so, can you tell me about</p> <p>20 when he first told you about this lawsuit?</p> <p>21 A. Oh. Basically, he was just -- he</p> <p>22 was explaining to me what it was about. And</p> <p>23 basically, it's all about basically</p>	<p style="text-align: right;">Page 28</p> <p>1 Q. Ronald Smith?</p> <p>2 A. No.</p> <p>3 Q. Wendell Thomas?</p> <p>4 A. No.</p> <p>5 Q. Did you recruit any other people</p> <p>6 to become involved in this litigation?</p> <p>7 A. Like I say, the only person I</p> <p>8 know was my union member that was with me.</p> <p>9 Q. All right.</p> <p>10 A. And I know she passed.</p> <p>11 Q. So, I'm going to show you what we</p> <p>12 will mark as Defendant's Exhibit 1.</p> <p>13</p> <p>14 (Whereupon, Defendant's Exhibit 1</p> <p>15 was marked for identification and</p> <p>16 copy of same is attached hereto.)</p> <p>17</p> <p>18 Q. (BY MR. MAULDIN) Here you go.</p> <p>19 Do you recognize this document?</p> <p>20 A. Yes.</p> <p>21 Q. And what is it?</p> <p>22 A. Basically, it's about the case.</p> <p>23 Q. So, that is the 2021 complaint</p>
<p style="text-align: right;">Page 27</p> <p>1 redistricting the lines where we could</p> <p>2 basically get another congress -- another</p> <p>3 congressman in to help us with our community.</p> <p>4 Q. And when was this?</p> <p>5 A. Ooh. I think that was back in</p> <p>6 2018.</p> <p>7 Q. Oh, so, this was for the original</p> <p>8 2019 case?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. And do you know any other</p> <p>11 plaintiffs in this case?</p> <p>12 A. I did know one because she was on</p> <p>13 our union board, but she passed away probably</p> <p>14 a year ago.</p> <p>15 Q. Okay. So, you don't know Marcus</p> <p>16 Caster?</p> <p>17 A. No.</p> <p>18 Q. Do you know LaKeisha Chestnut?</p> <p>19 A. No.</p> <p>20 Q. Bobby Lee DuBose?</p> <p>21 A. No.</p> <p>22 Q. Benjamin Jones?</p> <p>23 A. No.</p>	<p style="text-align: right;">Page 29</p> <p>1 filed?</p> <p>2 A. Yes.</p> <p>3 Q. So, have you seen it before?</p> <p>4 A. Yes.</p> <p>5 Q. Did you see a draft of it before</p> <p>6 it was filed?</p> <p>7 A. Sir?</p> <p>8 Q. Did you see a draft before it was</p> <p>9 filed?</p> <p>10 A. A draft?</p> <p>11 Q. Yes.</p> <p>12 A. Yes, I seen it. Yes, I've seen</p> <p>13 it. I've seen this on my email.</p> <p>14 Q. And do you know when that would</p> <p>15 have been, roughly?</p> <p>16 A. I don't know exactly when, but</p> <p>17 it's been a minute, though.</p> <p>18 Q. So, what is your understanding of</p> <p>19 the claim in this complaint?</p> <p>20 A. What's my understanding about the</p> <p>21 claim?</p> <p>22 Q. Yes.</p> <p>23 MS. RUTAHINDURWA: Object to</p>



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1 form.  
 2 Q. (BY MR. MAULDIN) You can answer.  
 3 A. Oh. Basically, about the  
 4 claim -- hold on. Rephrase that question,  
 5 please.  
 6 Q. So, what is essentially the legal  
 7 argument presented?  
 8 A. Oh, the legal argument is  
 9 about --  
 10 MS. RUTAHINDURWA: Object to  
 11 form.  
 12 Go ahead.  
 13 A. It's about the voting, Black  
 14 voters.  
 15 Q. (BY MR. MAULDIN) Uh-huh. And  
 16 it's what about the Black voters?  
 17 A. Basically, we're not -- we're  
 18 not -- we're not in the representation --  
 19 basically, we're not getting basically  
 20 represented in Congress right. I mean, we've  
 21 only got one Congress fighting for us right  
 22 now. But that's not going to do it when  
 23 she's by herself.

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1 Q. So, why don't you think -- you  
 2 know, you said that won't do it. What do you  
 3 mean by that?  
 4 A. I mean Congressman Sewell, she's  
 5 only one person. And you have basically a  
 6 room full of other people working against  
 7 you. That's kind of hard, like. I go  
 8 through that every day at work. Folks go  
 9 against you every day. But it's your job to  
 10 make sure the job get done right. Am I right  
 11 or am I wrong?  
 12 Q. So, when you said that everyone  
 13 has been working against Representative  
 14 Sewell, what do you mean by that?  
 15 A. I mean, let's just say she come  
 16 up with a bill or anything, and nine times  
 17 out of ten, she bring it up and she know it's  
 18 not going to pass. I mean, like, it could be  
 19 something simple, like, getting the roads  
 20 fixed. They say they ain't got enough money  
 21 in the budget for anything, right? Stuff  
 22 like that, little small stuff, she won't get  
 23 passed, won't get no backing or no help.

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1 But, I mean, it's hard. It's hard fighting a  
 2 battle by yourself.  
 3 Q. And why do you think she can't  
 4 get others on board?  
 5 A. I mean, basically, she's a  
 6 Democrat and too many Republicans in the  
 7 room.  
 8 Q. All right. I'm going to now show  
 9 you what we'll mark as Exhibit 2.  
 10  
 11 (Whereupon, Defendant's Exhibit 2  
 12 was marked for identification and  
 13 copy of same is attached hereto.)  
 14  
 15 Q. (BY MR. MAULDIN) I'll give you a  
 16 second to look at it. So, have you seen this  
 17 document before?  
 18 A. Yes. The first amendment of  
 19 claimant.  
 20 Q. Yes. Did you see a draft of this  
 21 before it was filed?  
 22 A. A rough draft, yes.  
 23 Q. Yes.

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1 A. Yes.  
 2 Q. And what is your understanding of  
 3 the claim in this complaint and how it  
 4 differs from the previous one?  
 5 A. The first amendment of the  
 6 complaint. Hold on one second.  
 7 MS. RUTAHINDURWA: You can take  
 8 your time. Notice that it's double-sided.  
 9 THE WITNESS: I didn't see that.  
 10 A. This is basically talking about  
 11 the voting right.  
 12 Q. (BY MR. MAULDIN) What was that?  
 13 A. This is basically talking about  
 14 the voting right and the First Amendment,  
 15 right, freedom of speech.  
 16 Q. So, that is -- this is the first  
 17 amendment complaint after the legislature  
 18 used new maps in 2023.  
 19 A. Right.  
 20 Q. Yes. Did you read any expert  
 21 report submitted in this case?  
 22 A. Did I read any extra reports?  
 23 Q. Yes.

<p style="text-align: right;">Page 34</p> <p>1 A. No, I did not.</p> <p>2 Q. Have you read any court opinions</p> <p>3 filed in this case?</p> <p>4 A. No.</p> <p>5 Q. Have you seen any of the maps</p> <p>6 associated with the case?</p> <p>7 A. I seen a few, but I didn't really</p> <p>8 understand them.</p> <p>9 Q. Do you know which ones you've</p> <p>10 seen?</p> <p>11 A. That was about -- that was the</p> <p>12 first time when I got involved with the case.</p> <p>13 That was probably about 2020 or 2021.</p> <p>14 Q. And you haven't seen any maps</p> <p>15 since then?</p> <p>16 A. No, I have not.</p> <p>17 Q. Have you seen any other documents</p> <p>18 that have been filed with the court in this</p> <p>19 case?</p> <p>20 A. No.</p> <p>21 Q. And what exactly do you want the</p> <p>22 court to do in this lawsuit?</p> <p>23 A. What I want the court to do?</p>	<p style="text-align: right;">Page 36</p> <p>1 districts just majority white. And,</p> <p>2 basically, they're sticking us in one</p> <p>3 district. I mean, it's not equal, put it</p> <p>4 like that. It's not equaled out.</p> <p>5 Q. So, what do you mean it's not</p> <p>6 equal?</p> <p>7 A. I mean, I know I'm not a map -- a</p> <p>8 map expert, but sometime when you go to your</p> <p>9 voting poles and everything else, like -- or</p> <p>10 you'll see them on TV, you'll see the</p> <p>11 majority of whites in one voting place and</p> <p>12 you have a majority of Blacks in another</p> <p>13 place.</p> <p>14 Q. I'm sorry. Could you -- let me</p> <p>15 ask that question again. I'm not sure if I</p> <p>16 understood your answer.</p> <p>17 A. Uh-huh.</p> <p>18 Q. So, you said that you didn't</p> <p>19 think it was equal the way the districts are</p> <p>20 right now?</p> <p>21 A. Right.</p> <p>22 Q. And I just asked for you to</p> <p>23 explain what you meant by it wasn't equal.</p>
<p style="text-align: right;">Page 35</p> <p>1 Q. Yes.</p> <p>2 A. Ask them to rewrite the maps to</p> <p>3 help us.</p> <p>4 Q. And what type of maps do you want</p> <p>5 them to provide?</p> <p>6 MS. RUTAHINDURWA: Object to</p> <p>7 form.</p> <p>8 A. I mean, I'm not a map expert, so</p> <p>9 I wouldn't know how that -- how that go.</p> <p>10 Q. (BY MR. MAULDIN) And you said</p> <p>11 that you want the courts to help you -- help</p> <p>12 us I think you said. Who do you mean by</p> <p>13 that?</p> <p>14 A. The Black voters in my</p> <p>15 neighborhood and the citizens around</p> <p>16 Jefferson County.</p> <p>17 Q. What is your understanding of</p> <p>18 redistricting?</p> <p>19 A. My understanding about</p> <p>20 redistricting is basically in the districts</p> <p>21 that -- the districts that I know of,</p> <p>22 basically, you have one district just mainly</p> <p>23 Black and you have the majority of the</p>	<p style="text-align: right;">Page 37</p> <p>1 A. I mean, you've got the majority</p> <p>2 of Republicans in one place and you've got</p> <p>3 the majority of Democrats in one place. And</p> <p>4 what I mean by that, the majority of the</p> <p>5 Blacks vote Democrats and the majority of the</p> <p>6 Republicans are white.</p> <p>7 Q. What is your understanding of</p> <p>8 when redistricting happens?</p> <p>9 A. Say that again.</p> <p>10 Q. What is your understanding of</p> <p>11 when redistricting happens?</p> <p>12 A. Winter?</p> <p>13 Q. When?</p> <p>14 A. Oh, when?</p> <p>15 Q. Yes. So, when do the states</p> <p>16 redistrict?</p> <p>17 A. When do the states redistrict?</p> <p>18 Q. Yes.</p> <p>19 A. I have no clue when the states</p> <p>20 redistrict.</p> <p>21 Q. All right. So, when did you</p> <p>22 become interested in redistricting as far as</p> <p>23 like --</p>

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1 MS. RUTAHINDURWA: Object to  
2 form.  
3 A. When I became interested in it?  
4 Q. (BY MR. MAULDIN) Yes.  
5 A. Basically, talking to my union  
6 rep. I mean, my district when he was  
7 explaining to me and everything else.  
8 Q. And that was when he was  
9 recruiting you --  
10 A. Yeah.  
11 Q. -- to join the 2020 lawsuit?  
12 MS. RUTAHINDURWA: Object to  
13 form.  
14 A. I wouldn't say recruiting. He  
15 was just explaining to me. It was -- it was  
16 my choice to basically get involved or not.  
17 Q. (BY MR. MAULDIN) But he was  
18 asking you if you were interested?  
19 A. Right. Basically, he was just  
20 letting me know that it'll help my community  
21 by getting involved.  
22 Q. All right. Did you follow the  
23 2020 Census at all?

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1 A. Not the 2020. I really didn't.  
2 Q. And do you know what role, if  
3 any, population plays in drawing  
4 Congressional maps?  
5 A. No, I do not.  
6 Q. Do you know how Alabama's  
7 population changed from the 2010 Census to  
8 the 2020 Census?  
9 A. No. I have -- I don't know how  
10 much it changed.  
11 Q. Do you know where Black citizens  
12 live in Alabama?  
13 A. I mean, majority, yes, since I'm  
14 from Mobile. I mean, you have some in Mobile  
15 in the country part and some in Montgomery  
16 because of schooling.  
17 Q. What was that at the end you  
18 said?  
19 A. You have some in Montgomery that  
20 basically because of schooling.  
21 Q. And what do you mean by that?  
22 A. Basically, the Black colleges,  
23 Alabama State, and there's another one,

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1 Tuskegee.  
2 Q. And so, you said Black citizens  
3 also live in the country parts.  
4 A. Yes.  
5 Q. What would that be?  
6 A. I mean, I'm originally from  
7 Mobile. And, basically, I have the majority  
8 of my folks that stay -- I don't know if  
9 y'all ever heard of a small town called Grove  
10 Hill.  
11 Q. Can you say that one more time?  
12 A. Grove Hill.  
13 Q. Okay.  
14 A. And, basically, it's a small  
15 country town in Mobile, basically, farmland.  
16 Q. And what is the Black Belt?  
17 A. The Black Belt?  
18 Q. Yes.  
19 A. From my understanding, the Black  
20 Belt that I know of is country, too. It's  
21 small country towns in the -- it's in the --  
22 it's in between Montgomery and Mobile that I  
23 know of. I don't know the counties, so --

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1 not by heart.  
2 Q. And do you know whether the Black  
3 Belt gained or lost population from 2010 to  
4 2020?  
5 A. I'm pretty sure it probably lost.  
6 Q. Do you know what percentage of  
7 Alabama's population is Black?  
8 A. No, I do not.  
9 Q. Going back to Mobile, so do Black  
10 people live in Mobile County outside of the  
11 City of Mobile?  
12 A. Yes, you have some that stay on  
13 the outside and in the inside, yes, that I  
14 know of.  
15 Q. So, what is your understanding of  
16 what happened in Alabama with the  
17 redistricting once the 2020 Census was  
18 released?  
19 MS. RUTAHINDURWA: Object to  
20 form.  
21 A. What you mean by that?  
22 Q. (BY MR. MAULDIN) So, when  
23 Congress redistricted -- I'm sorry. Let me

<p style="text-align: right;">Page 42</p> <p>1 back up.</p> <p>2 In 2020 once the census results</p> <p>3 were released, how did the redistricting</p> <p>4 proceed from there?</p> <p>5 A. I mean, I don't know. I don't</p> <p>6 know how the redistricting proceeded. I</p> <p>7 mean, we had the case going on by then. And</p> <p>8 the lines from what -- from what I was</p> <p>9 understanding, they would be -- never did</p> <p>10 move.</p> <p>11 Q. So, your understanding is that</p> <p>12 the lines stayed the same after the 2020</p> <p>13 Census?</p> <p>14 MS. RUTAHINDURWA: Object to</p> <p>15 form.</p> <p>16 A. I mean, they moved just a little</p> <p>17 bit but not much.</p> <p>18 Q. (BY MR. MAULDIN) Did you follow</p> <p>19 the legislative proceedings?</p> <p>20 A. Did I follow them?</p> <p>21 Q. Yes.</p> <p>22 A. What you mean by that?</p> <p>23 Q. Were you keeping up with the</p>	<p style="text-align: right;">Page 44</p> <p>1 Q. -- this map?</p> <p>2 A. I mean, I've seen a lot of maps</p> <p>3 but -- basically, what the colors for --</p> <p>4 because it don't explain what the colors for.</p> <p>5 I mean --</p> <p>6 Q. So, I'm sorry. What was that?</p> <p>7 A. I mean, what are the colors --</p> <p>8 why are the -- basically, all of the counties</p> <p>9 in color code?</p> <p>10 Q. It's the district number.</p> <p>11 A. Oh, it's the districts?</p> <p>12 Q. Oh, no. Actually --</p> <p>13 A. Oh, okay.</p> <p>14 Q. Yes. So, do you know which</p> <p>15 district you lived in under this map?</p> <p>16 A. Yes. It's Jefferson. See it</p> <p>17 right there in the middle.</p> <p>18 Q. What district number would that</p> <p>19 have been?</p> <p>20 A. District number, it say 6.</p> <p>21 That's what it say on here.</p> <p>22 Q. So, if you'll flip to Exhibit --</p> <p>23 or the original complaint was the first</p>
<p style="text-align: right;">Page 43</p> <p>1 different maps that were proposed --</p> <p>2 A. No, I did not.</p> <p>3 Q. -- of the areas?</p> <p>4 Okay. So, you didn't speak at</p> <p>5 any of the legislative hearings?</p> <p>6 A. No.</p> <p>7 Q. And you didn't submit any maps to</p> <p>8 the legislator?</p> <p>9 A. No, I did not.</p> <p>10 Q. All right. So, did you see the</p> <p>11 map that Alabama adopted in 2021 for its new</p> <p>12 district lines?</p> <p>13 A. No, we -- I mean --</p> <p>14 Q. I can provide you with a copy.</p> <p>15 A. We should have --</p> <p>16</p> <p>17 (Whereupon, Defendant's Exhibit 3</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 MR. MAULDIN) So, do you</p> <p>22 recognize --</p> <p>23 A. The map?</p>	<p style="text-align: right;">Page 45</p> <p>1 document that I handed to you.</p> <p>2 A. Uh-huh.</p> <p>3 Q. And can you flip to Page 5?</p> <p>4 A. Oh. My bad. Page 5?</p> <p>5 Q. Yes. It's Paragraph 16.</p> <p>6 A. I see it.</p> <p>7 Q. And so, do you live in -- did you</p> <p>8 live in Congressional District 7 --</p> <p>9 A. Yes.</p> <p>10 Q. -- according to this map?</p> <p>11 So, do you have any issues with</p> <p>12 this map?</p> <p>13 MS. RUTAHINDURWA: Object to</p> <p>14 form.</p> <p>15 A. I mean, I'm not a map person, but</p> <p>16 the only issue I see on this map, like, part</p> <p>17 of Jefferson in 7 and part of it is in 6.</p> <p>18 Q. (BY MR. MAULDIN) What don't you</p> <p>19 like about Jefferson being split up?</p> <p>20 A. I mean, it should be in one</p> <p>21 district, don't you think?</p> <p>22 Q. Why do you think it should be in</p> <p>23 one district?</p>

<p style="text-align: right;">Page 46</p> <p>1 A. Basically, because we've got the 2 same representative. 3 Q. What do you mean by that? 4 A. I feel like if you're in -- if 5 you're in one county, one county shall 6 have -- should have one representative. It 7 shouldn't have two. 8 Q. Why do you think that? 9 A. Why do I think that? 10 Q. Yes. 11 A. I mean, basically, it's -- I 12 mean -- let me say this: Jefferson County 13 basically is just one county, right? 14 Q. Uh-huh. 15 A. Okay. With one county, why do 16 you have two districts -- I mean, two 17 Congressmen representing one county? It 18 should be just one. Because if you have two 19 people basically representing one county, I 20 mean, you've got -- you've got -- you've got 21 a fight right there. Them two people might 22 not agree on the same thing. 23 Q. So, you don't think that county</p>	<p style="text-align: right;">Page 48</p> <p>1 A. No, Carol. I mean, we just had 2 our city council going on and mayor. I just 3 remember her last name because she was -- she 4 was campaigning lately. 5 Q. All right. Do you have any 6 opinions on what role, if any, race played in 7 drawing that 2021 map? 8 A. I mean, if I could see what 9 cities that's basically split on this map, I 10 mean, I can -- I can tell you what the -- 11 what the problem is. 12 Q. Why would you need to see the 13 cities? 14 A. Because you have the majority -- 15 you have the majority of basically white 16 people stay in Jefferson County that 17 basically it might be split. I mean, I know 18 the white cities that -- I mean, I know the 19 cities that the majority are white and I know 20 the part that the majority are Black if I see 21 the cities. 22 Q. So, do you think the white and 23 Black parts should stay in the same district?</p>
<p style="text-align: right;">Page 47</p> <p>1 lines should be split in redistricting? The 2 county should be split? 3 A. Yeah. Basically, the county. 4 THE COURT REPORTER: I didn't 5 catch that. 6 Q. (BY MR. MAULDIN) I'm sorry. The 7 county should be split. 8 A. Right. I don't think the county 9 should be split, no. 10 Q. All right. Do you know who your 11 representative was under this map? 12 A. Was? 13 MS. RUTAHINDURWA: Object to 14 form. 15 A. Congressman Sewell. 16 Q. (BY MR. MAULDIN) Who is that? 17 A. Sewell. 18 Q. Yeah. Do you know her first 19 name? 20 A. It's -- I can't remember right 21 now. It's Carol, is it? Carol Sewell? I 22 mean -- 23 Q. You said Terri?</p>	<p style="text-align: right;">Page 49</p> <p>1 MS. RUTAHINDURWA: Object to 2 form. 3 A. I mean, like I said, I just think 4 Jefferson County should be just one district. 5 Q. (BY MR. MAULDIN) Do you have any 6 evidence about what role race played in the 7 drawing of this map, if it played any role? 8 A. Do I -- rephrase that question 9 again. 10 Q. Do you have any reason to believe 11 that race played a role in drawing this map? 12 A. Drawing this map? I mean, like I 13 said, I can't -- I can't -- I really can't go 14 by -- I really can't go by this map, I mean, 15 by seeing just Jefferson County. I mean, I 16 need to see what part of Jefferson County 17 that's in District 7 and what part is in 18 District 6. 19 Q. So, other than Jefferson County 20 being in two districts, is there anything 21 else about this map that raises questions 22 with you about race? 23 A. I mean, yes, because I see Shelby</p>



<p style="text-align: right;">Page 50</p> <p>1 County is in District 6 and Bibb County and  2 Chilton County. And I know the majority of  3 those three counties are majority white.  4 Q. So, why does that make you think  5 that race has something to do with the  6 districts?  7 A. Because it's looking like they've  8 got us all in one county -- I mean, one  9 district because I know about Perry and I  10 know about Pickens. Pickens and Perry, and  11 especially Clarke County, are majority Black,  12 and Wilcox.  13 Q. What about the other counties in  14 District 7?  15 A. I know about Perry and Hale,  16 Sumter, too. They majority are Black. Now,  17 Chickasaw and -- and it's got Montgomery  18 split down here on the side. I mean, if I  19 know the cities -- if the cities was on here,  20 I know a lot in between.  21 MR. MAULDIN: Do you want to take  22 a five-minute break?  23 MS. RUTAHINDURWA: Sure.</p>	<p style="text-align: right;">Page 52</p> <p>1 Q. What was the effect on Alabama's  2 districts?  3 A. Basically, redistrict. What was  4 the effect? I mean, from this map, it look  5 like there wasn't no effect. But, like I  6 say, I'm not a map quiz. And I'm -- and I'm  7 just looking at this map and seeing all the  8 counties that I know of. Majority of them  9 are in one district that the majority are  10 Black.  11 Q. Are you aware that the map you're  12 looking at, the 2021 map --  13 A. Right.  14 Q. -- could not be used after the  15 Supreme Court's decision?  16 A. I mean, what you mean by that?  17 Why they couldn't use this after the Supreme  18 Court decision?  19 Q. So, are you aware that the  20 Supreme Court was deciding whether Alabama  21 could use that 2021 map?  22 A. I mean, ain't this the map that  23 they approved?</p>
<p style="text-align: right;">Page 51</p> <p>1 (Whereupon, a brief recess was  2 taken.)  3  4 Q. (By MR. MAULDIN) So, are you  5 aware that this litigation reached the  6 Supreme Court?  7 A. Yes. Yes.  8 Q. Did you attend argument --  9 A. No.  10 Q. -- in D.C.?  11 A. No.  12 Q. Did you make any public  13 statements?  14 A. No, I did not.  15 Q. Are you aware that your side won?  16 A. Say that again.  17 Q. Are you aware that your side won  18 in the Supreme Court?  19 A. Our side won? Yes, I'm aware.  20 Q. What was your understanding of  21 the real world impact of the Supreme Court's  22 decision?  23 A. What you mean by that?</p>	<p style="text-align: right;">Page 53</p> <p>1 Q. So, earlier, we were talking  2 about how -- I asked if you were aware that  3 your side won in the Supreme Court.  4 A. Yes.  5 Q. And you were challenging --  6 A. Right.  7 Q. -- the state using that 2021 map?  8 A. Right. And they cannot use it,  9 right?  10 Q. So, let's talk about the 2023  11 legislative proceedings. Did you review any  12 of the maps that were submitted?  13 A. Did I review them?  14 Q. I'm sorry. What was that?  15 A. Did I review any of them?  16 Q. Did you follow the 2023  17 legislative proceedings at all?  18 A. No, I did not.  19 Q. And so, did you review any of the  20 maps that were submitted?  21 A. No, I ain't reviewed none of the  22 maps.  23 Q. And did you speak at any of the</p>



<p style="text-align: right;">Page 54</p> <p>1 legislative hearings?</p> <p>2 A. No.</p> <p>3 Q. Did you submit any maps to the</p> <p>4 legislature at all?</p> <p>5 A. No. No, I didn't.</p> <p>6 Q. Or did you submit any documents</p> <p>7 to the legislature?</p> <p>8 A. No.</p> <p>9 Q. So, do you know what a community</p> <p>10 of interest is?</p> <p>11 A. No. Explain it to me.</p> <p>12 Q. I'll stick to questions.</p> <p>13 So, are there -- let's back up.</p> <p>14 Have you reviewed the 2023 map that the</p> <p>15 Alabama Legislature passed?</p> <p>16 A. No, I have not.</p> <p>17</p> <p>18 (Whereupon, Defendant's Exhibit 4</p> <p>19 was marked for identification and</p> <p>20 copy of same is attached hereto.)</p> <p>21</p> <p>22 MS. RUTAHINDURWA: And just to</p> <p>23 make the record clear, you're showing us</p>	<p style="text-align: right;">Page 56</p> <p>1 that we have to travel every day, the same</p> <p>2 roads, the same everything, like, same laws,</p> <p>3 everything. Everything is still the same.</p> <p>4 But we just don't have -- we have two</p> <p>5 different representatives.</p> <p>6 Q. So, you talked about roads. Why</p> <p>7 do -- why does having the same roads mean</p> <p>8 that people in Jefferson County should have</p> <p>9 the same Congressional representative?</p> <p>10 A. Why should we have the same?</p> <p>11 Because we -- I mean -- rephrase that</p> <p>12 question just -- I'm trying to get a better</p> <p>13 understanding of how you want me to answer</p> <p>14 that question.</p> <p>15 Q. So, you said that people in</p> <p>16 Jefferson County have the same interest</p> <p>17 because they have the same roads --</p> <p>18 A. Right.</p> <p>19 Q. -- same laws, stuff like that --</p> <p>20 A. Right.</p> <p>21 Q. -- right?</p> <p>22 So, why does their federal</p> <p>23 representative need to be the same based off</p>
<p style="text-align: right;">Page 55</p> <p>1 Exhibit --</p> <p>2 MR. MAULDIN: Exhibit 4.</p> <p>3 MS. RUTAHINDURWA: -- 4?</p> <p>4 MR. MAULDIN: Yes. Sorry.</p> <p>5 MS. RUTAHINDURWA: You're good.</p> <p>6 Q. (BY MR. MAULDIN) So, have you</p> <p>7 seen this map before?</p> <p>8 A. No.</p> <p>9 Q. So, are there -- are there any</p> <p>10 communities that have common interests in</p> <p>11 this map that you believe should be kept</p> <p>12 together but are not?</p> <p>13 MS. RUTAHINDURWA: Object to</p> <p>14 form.</p> <p>15 A. Jefferson is still split.</p> <p>16 Q. (BY MR. MAULDIN) So, what do</p> <p>17 people in Jefferson have in common?</p> <p>18 A. What do they have in common?</p> <p>19 They stay in the same county.</p> <p>20 Q. So, what about them being in the</p> <p>21 same county makes them have similar</p> <p>22 interests?</p> <p>23 A. I mean, we have the same roads</p>	<p style="text-align: right;">Page 57</p> <p>1 the same roads --</p> <p>2 A. Because they need --</p> <p>3 Q. -- same laws?</p> <p>4 A. -- to be talking to either one</p> <p>5 person instead of two people.</p> <p>6 Like, if you talk to two people,</p> <p>7 like -- basically, you'll know basically who</p> <p>8 to talk to. Like, if you've got two</p> <p>9 representatives and you don't know what part</p> <p>10 of Jefferson you stay in, like, who's your</p> <p>11 representative, it's confusing. If you just</p> <p>12 have one representative, I mean, you can just</p> <p>13 call that one person.</p> <p>14 Q. So, if you have issues with the</p> <p>15 roads now, do you know who to call?</p> <p>16 A. Yes, I would call my -- I'd call</p> <p>17 the mayor's office first.</p> <p>18 Q. Uh-huh.</p> <p>19 A. Or I call my council member</p> <p>20 first, and then, I'll call the mayor's office</p> <p>21 if the council member don't do nothing.</p> <p>22 Q. All right. Are white residents a</p> <p>23 part of, you know, Jefferson County that you</p>

<p style="text-align: right;">Page 58</p> <p>1 believe should be in one district?</p> <p>2 A. Say that again, now.</p> <p>3 Q. So, there are white residents in</p> <p>4 Jefferson County?</p> <p>5 A. Yes.</p> <p>6 Q. And you think Jefferson County</p> <p>7 needs to be in one district?</p> <p>8 A. Yes.</p> <p>9 Q. So, do you believe that parts of</p> <p>10 Mobile and the Black Belt have the same</p> <p>11 interests?</p> <p>12 A. Yes.</p> <p>13 Q. And what would those interests</p> <p>14 be?</p> <p>15 A. I mean, what you mean by</p> <p>16 interest? Like -- I mean, they both travel</p> <p>17 the same water line. And what I mean by</p> <p>18 water line, Mississippi. I mean, they're</p> <p>19 closer to the gulf and everything, like. All</p> <p>20 that play a part.</p> <p>21 Q. Is there anything else that makes</p> <p>22 you believe they have the same interests,</p> <p>23 goals, problems?</p>	<p style="text-align: right;">Page 60</p> <p>1 form.</p> <p>2 A. What you mean by that?</p> <p>3 Q. (BY MR. MAULDIN) So, earlier, I</p> <p>4 asked what common interests do people have</p> <p>5 in --</p> <p>6 A. Mobile --</p> <p>7 Q. -- Mobile County --</p> <p>8 A. -- and Montgomery County have?</p> <p>9 Q. Yes.</p> <p>10 A. Basically, it's country. It's</p> <p>11 farmland. You have some farmland in</p> <p>12 Montgomery County, too. I mean, farther back</p> <p>13 in Montgomery that I know of.</p> <p>14 Q. So, earlier, we talked about your</p> <p>15 Congressional representative, Ms. Sewell.</p> <p>16 Have you ever contacted her?</p> <p>17 A. No, I have not.</p> <p>18 Q. Have you ever tried to contact</p> <p>19 her?</p> <p>20 A. No.</p> <p>21 Q. Do you know who represented you</p> <p>22 before Congresswoman Sewell?</p> <p>23 A. No, I have -- I don't know who it</p>
<p style="text-align: right;">Page 59</p> <p>1 A. Yes.</p> <p>2 Q. And what would that be?</p> <p>3 A. Basically, the majority of -- the</p> <p>4 majority of the Black Belt in Mobile are</p> <p>5 country. Basically, it's -- basically, it's</p> <p>6 where we get our crops and everything from.</p> <p>7 So, basically, I know they grow a lot down</p> <p>8 there.</p> <p>9 Q. You said they -- what was that at</p> <p>10 the very end?</p> <p>11 A. They grow a lot. Grow a lot.</p> <p>12 They have a lot of farmland down there.</p> <p>13 Q. And would that be true for Mobile</p> <p>14 County and Montgomery?</p> <p>15 A. Yes. Because where I was talking</p> <p>16 about the little small country town that I'm</p> <p>17 originally from, Grove Hill, it's in Clarke</p> <p>18 County. So, I know that's riding on the</p> <p>19 Black Belt. And then, Mobile County is right</p> <p>20 next to it.</p> <p>21 Q. So, what about people in</p> <p>22 Montgomery and Mobile County?</p> <p>23 MS. RUTAHINDURWA: Object to</p>	<p style="text-align: right;">Page 61</p> <p>1 was before her.</p> <p>2 Q. What does a candidate of choice</p> <p>3 mean to you?</p> <p>4 A. What you mean? What -- I mean, I</p> <p>5 want a candidate that's actually going to</p> <p>6 help me. And what I mean by help, basically,</p> <p>7 help my community, help stuff around me,</p> <p>8 like, grocery stores, food. I mean,</p> <p>9 basically getting stuff that I need of</p> <p>10 everyday living around me.</p> <p>11 Q. And help you with that in what</p> <p>12 way?</p> <p>13 A. Like, right now, like -- which</p> <p>14 the roads, they're pretty decent, but they</p> <p>15 can be better. They can be a whole lot</p> <p>16 better. I mean, a whole lot. Like, you</p> <p>17 might see a pothole every now and then, but,</p> <p>18 I mean, it don't take much to fill up a</p> <p>19 pothole. With me working in the foundry</p> <p>20 business, I know all that could be fixed just</p> <p>21 like that. And it's not getting done. It's</p> <p>22 not getting done.</p> <p>23 And, basically, with grocery</p>

<p style="text-align: right;">Page 62</p> <p>1 stores, like, we haven't got groceries around  2 in my -- in my -- around in my neighborhood.  3 Like, we have to travel pretty far. But it's  4 getting better, but it's not -- it's not  5 like -- it's not a emergency to it, like.  6 They're just taking their time.  7 Q. So, why do you think those  8 problems aren't being addressed, so, like,  9 the potholes, for example, and the grocery  10 stores?  11 A. It got to be -- to me,  12 personally, it's got to be because stuff  13 ain't getting approved.  14 Q. It's not being approved?  15 A. Yes, it's not getting approved  16 quick enough or fast enough. It's not no  17 urgency to it. Basically, I know the  18 customers, which I am, we are complaining,  19 but we're not getting no help.  20 Q. And on the grocery stores, you  21 said that there weren't enough grocery stores  22 around; is that what you said?  23 A. I mean, not close by me. I mean,</p>	<p style="text-align: right;">Page 64</p> <p>1 A. When I was eighteen. That was --  2 how many years that was? 2003. Yeah.  3 Q. Did you have any issues  4 registering?  5 A. No, I did not.  6 Q. And what county are you currently  7 registered in?  8 A. Jefferson.  9 Q. And you've never been registered  10 anywhere else?  11 A. No.  12 Q. So, you just registered once?  13 A. Yes.  14 Q. Do you remember how you  15 registered?  16 A. Yes, at the post office.  17 Q. Had you -- you said you've never  18 had to update your registration or did you  19 speak about that?  20 A. I mean, probably updated it  21 twice, when I moved.  22 Q. Did you have any problems  23 updating it?</p>
<p style="text-align: right;">Page 63</p> <p>1 my nearest Walmart is probably -- it's in  2 Jefferson, but I have to travel probably  3 about a good twenty minutes to get to it, or  4 thirty at the most. And I know they have  5 neighborhood Walmarts everywhere.  6  7 (Whereupon, a discussion was held  8 off the record.)  9  10 Q. (BY MR. MAULDIN) So, grocery  11 stores. Do you have any white neighbors?  12 A. Yes.  13 Q. And do they also have to travel  14 twenty minutes --  15 A. Yes.  16 Q. -- to the store?  17 And would they also have to  18 travel on the same roads with potholes that  19 aren't being fixed?  20 A. Yes.  21 Q. Are you registered to vote?  22 A. Yes.  23 Q. When did you first register?</p>	<p style="text-align: right;">Page 65</p> <p>1 A. No.  2 Q. Have you ever helped anyone else  3 register to vote?  4 A. Yes.  5 Q. And how did you help them?  6 A. I showed them where they can go  7 to register.  8 Q. And did those people who you  9 assisted, did they have any issues --  10 A. No.  11 Q. -- registering to vote?  12 Are you aware of problems that  13 anyone has had registering to vote?  14 A. No.  15 Q. So, how often do you vote?  16 A. Basically, every time something  17 come up, every time the poles come up. Like,  18 you have city councils, mayor. About every  19 time, basically.  20 Q. Do you vote in primary elections?  21 A. Yes.  22 Q. Primary runoff elections?  23 A. Yes.</p>

<p style="text-align: right;">Page 66</p> <p>1 Q. And general elections, too?</p> <p>2 A. Yes.</p> <p>3 Q. Where do you currently vote?</p> <p>4 A. Brown Elementary.</p> <p>5 Q. Is Brown Elementary a convenient</p> <p>6 place for you to vote?</p> <p>7 A. Yes. It's probably five minutes</p> <p>8 away from the house.</p> <p>9 Q. And is it open when you appear to</p> <p>10 vote?</p> <p>11 A. Yes.</p> <p>12 Q. Have you had any problems voting?</p> <p>13 A. No.</p> <p>14 Q. Have you ever voted absentee?</p> <p>15 A. No.</p> <p>16 Q. Are there any ways that voting is</p> <p>17 hard for you because you're Black?</p> <p>18 A. No.</p> <p>19 Q. When you decide which candidate</p> <p>20 you support, is race a significant</p> <p>21 consideration?</p> <p>22 A. No, it's not.</p> <p>23 Q. Are there any policy issues which</p>	<p style="text-align: right;">Page 68</p> <p>1 lot -- not a -- not like a lot basically</p> <p>2 living. And what I mean by living is like,</p> <p>3 if I have to travel twenty minutes to just to</p> <p>4 go shop, it's a problem. And sometimes I be</p> <p>5 wanting to go, like, five minutes away from</p> <p>6 my house to shop. But if you have to go out</p> <p>7 of town, like, twenty or thirty minutes to go</p> <p>8 shopping, there ain't no fun in that.</p> <p>9 Q. Have you worked at a polling</p> <p>10 place --</p> <p>11 A. No.</p> <p>12 Q. -- on election day?</p> <p>13 Have you helped -- I'm sorry?</p> <p>14 A. I said, excuse me. I was talking</p> <p>15 before you even finished the question.</p> <p>16 Q. Oh, no. I'll repeat the</p> <p>17 question.</p> <p>18 Have you worked at a polling</p> <p>19 place on election day?</p> <p>20 A. No.</p> <p>21 Q. Have you helped other people vote</p> <p>22 on election day?</p> <p>23 A. Yes, I have. I mean, I've drove</p>
<p style="text-align: right;">Page 67</p> <p>1 drive your selection of a candidate?</p> <p>2 A. No.</p> <p>3 Q. So, how do you decide who to vote</p> <p>4 for?</p> <p>5 A. How do I decide?</p> <p>6 Q. Yes.</p> <p>7 A. Basically, I read up on --</p> <p>8 sometimes I read up on the candidate,</p> <p>9 sometimes. I mean, they have flyers out</p> <p>10 sometimes or you can basically Google. You</p> <p>11 can basically Google somebody these days and</p> <p>12 read up, see how they'll help you.</p> <p>13 Q. See how they'll help in what way?</p> <p>14 A. I mean, help my community,</p> <p>15 basically help the roads, help around me,</p> <p>16 help the grocery stores, help the economy,</p> <p>17 everything.</p> <p>18 Q. So, are roads a pretty</p> <p>19 significant factor in your voting?</p> <p>20 A. I mean, the majority, I'll say</p> <p>21 yes, because they're really rough roads,</p> <p>22 grocery stores, like -- just basically, it's</p> <p>23 not -- where I stay at, I mean, it's not a</p>	<p style="text-align: right;">Page 69</p> <p>1 folks over to the poles.</p> <p>2 Q. And do you know if they ever had</p> <p>3 any issues with voting?</p> <p>4 A. No, they have not, not when I</p> <p>5 went with them.</p> <p>6 Q. Just to be clear, they did not</p> <p>7 have issues?</p> <p>8 A. No.</p> <p>9 Q. Okay. Do you consider yourself</p> <p>10 politically active?</p> <p>11 A. What you mean by that? I mean,</p> <p>12 because one time, I have helped somebody</p> <p>13 basically get in office. I mean, they ran</p> <p>14 for -- it was council.</p> <p>15 Q. And what did you do?</p> <p>16 A. I served them basically passing</p> <p>17 out flyers, putting up signs, and going door</p> <p>18 to door.</p> <p>19 Q. Are there any other types of</p> <p>20 political activities you engage in?</p> <p>21 A. No.</p> <p>22 Q. Are you a member of any political</p> <p>23 party at the state or county level?</p>

<p style="text-align: right;">Page 70</p> <p>1 A. No, I'm not.</p> <p>2 Q. Are you a member of a political</p> <p>3 party at the national level?</p> <p>4 A. No.</p> <p>5 Q. I'm sorry. Could you repeat</p> <p>6 that?</p> <p>7 A. No.</p> <p>8 Q. Do you associate with the</p> <p>9 Democratic Party?</p> <p>10 A. Do I associate with them?</p> <p>11 Q. Yes.</p> <p>12 A. I mean, I know a few Democrats.</p> <p>13 Q. Do you vote Democrat?</p> <p>14 A. Yes, I do.</p> <p>15 Q. Have you ever voted for a</p> <p>16 Republican?</p> <p>17 A. Yes, I have.</p> <p>18 Q. Do you know who that was?</p> <p>19 A. Darius Foster.</p> <p>20 Q. What office was he running for?</p> <p>21 A. He was running for councilman,</p> <p>22 city council.</p> <p>23 Q. And what year would that have</p>	<p style="text-align: right;">Page 72</p> <p>1 they'll basically help me more than the</p> <p>2 Republicans will.</p> <p>3 Q. Why do you think Democrats will</p> <p>4 help you more?</p> <p>5 A. I mean, it just depends on what</p> <p>6 we're voting on and what they've got -- what</p> <p>7 we've got going on.</p> <p>8 Q. So, do you think the Democratic</p> <p>9 Party is more responsive to the needs of</p> <p>10 Black voters than the Republican Party?</p> <p>11 A. Yes.</p> <p>12 Q. How so?</p> <p>13 A. I mean, from what Democrats do,</p> <p>14 they help out the poor, the majority, and the</p> <p>15 mid -- and the mid class. Republicans,</p> <p>16 basically, they help out the higher class.</p> <p>17 They're not worried about the mid or the poor</p> <p>18 class, the middle, but especially not the</p> <p>19 middle class.</p> <p>20 Q. And why do you think that is?</p> <p>21 A. Why do I think that?</p> <p>22 Q. In your view, why do Democrats</p> <p>23 care more about poor and middle class voters?</p>
<p style="text-align: right;">Page 71</p> <p>1 been?</p> <p>2 A. I think it was like 2015, 2016.</p> <p>3 It was -- it was -- it was -- it was back.</p> <p>4 Q. Did he win?</p> <p>5 A. No, he did not.</p> <p>6 Q. So, why did you support him?</p> <p>7 A. Why did I support him? He was an</p> <p>8 old friend, old football running mate. Me</p> <p>9 and him played ball together in high school.</p> <p>10 I know he's good folks.</p> <p>11 Q. So, other than that, you've</p> <p>12 always voted Democrat or do you vote for</p> <p>13 other Republicans?</p> <p>14 A. I mean, I vote for the -- for the</p> <p>15 best candidate, but the majority, I vote</p> <p>16 Democrat.</p> <p>17 Q. So, why do you generally vote</p> <p>18 Democrat?</p> <p>19 A. Because Democrats basically --</p> <p>20 they're basically -- basically, they help me.</p> <p>21 I mean, from their perspective and all their</p> <p>22 general things are basically for me. I don't</p> <p>23 know about anybody else, but I know that</p>	<p style="text-align: right;">Page 73</p> <p>1 A. That's a good question. I mean,</p> <p>2 that's a really a hard question and a good</p> <p>3 question but -- I mean, it could be just to</p> <p>4 get votes. But the majority of the times,</p> <p>5 like, you'll see the progress sometimes. You</p> <p>6 see the progress more -- I'll put it like</p> <p>7 this: You see the progress more in the</p> <p>8 Democrat more than you see in the Republican.</p> <p>9 Q. What do you mean by the progress?</p> <p>10 A. I mean, you see stuff -- when you</p> <p>11 get a Democrat be in the office, you see</p> <p>12 stuff start changing around your</p> <p>13 neighborhood. When you see a Republican get</p> <p>14 in office, you don't see much. You don't</p> <p>15 see -- and then, it's not, like I said, quick</p> <p>16 like a Democrat will do it. A Democrat will</p> <p>17 get something done quick in your</p> <p>18 neighborhood. But a Republican, it'll</p> <p>19 probably be -- by the time they're running</p> <p>20 again, you might start seeing progress.</p> <p>21 Q. Can you give me some examples of</p> <p>22 Democrats being elected and then seeing the</p> <p>23 progress, you know, from getting stuff done</p>



<p style="text-align: right;">Page 74</p> <p>1 quickly?</p> <p>2 A. I mean, like, in Birmingham, I'll</p> <p>3 put it like this: We've got a Democratic</p> <p>4 mayor. Ever since he's been in office, we've</p> <p>5 been seeing a whole lot of change. I'm</p> <p>6 talking about like a whole lot. You've been</p> <p>7 seeing houses getting torn down, roads</p> <p>8 getting built, and a lot of stuff like</p> <p>9 entertainment coming in town. Like, you see</p> <p>10 the revenue. But I could -- that's the only</p> <p>11 way I could explain how the Democrat is</p> <p>12 getting stuff done. It's local around me. I</p> <p>13 mean, we had a Republican mayor, it's been --</p> <p>14 it's been a while that I know of.</p> <p>15 Q. Do you know when the last one was</p> <p>16 ever, the last of your memory?</p> <p>17 A. Mayor? No, I have not.</p> <p>18 Q. Have you ever run for office?</p> <p>19 A. No.</p> <p>20 Q. Do you have any plans to?</p> <p>21 A. No. Well, hold on. Rephrase</p> <p>22 that. What you mean by office? Like --</p> <p>23 because I was vice president of a union, but</p>	<p style="text-align: right;">Page 76</p> <p>1 lottery for the State of Alabama.</p> <p>2 Q. Did you support Doug Jones when</p> <p>3 he ran for reelection?</p> <p>4 A. Yes.</p> <p>5 Q. So, do you know who the leaders</p> <p>6 of the Alabama Democratic Party are?</p> <p>7 A. The leaders?</p> <p>8 Q. Yes.</p> <p>9 A. I don't know the leaders. No.</p> <p>10 Q. What's your perception of the</p> <p>11 strength of the Alabama Democratic Party?</p> <p>12 MS. RUTAHINDURWA: Object to</p> <p>13 form.</p> <p>14 A. I mean, what you mean by that,</p> <p>15 how strong it is or how weak?</p> <p>16 Q. (BY MR. MAULDIN) Either one.</p> <p>17 A. I mean, I don't -- I mean, mind</p> <p>18 frame that they're strong-minded, but action,</p> <p>19 I mean, I don't see -- I don't -- I mean, I</p> <p>20 see progress sometimes but not like I should.</p> <p>21 Q. Do you think they're doing a good</p> <p>22 job of picking good candidates and mobilizing</p> <p>23 voters?</p>
<p style="text-align: right;">Page 75</p> <p>1 I don't plan on running no more.</p> <p>2 Q. Just any, you know, city --</p> <p>3 A. No.</p> <p>4 Q. -- state --</p> <p>5 A. No. No. No councilman, no</p> <p>6 nothing. It's too stressful.</p> <p>7 Q. I think earlier you said you had</p> <p>8 been part of a political campaign for a</p> <p>9 friend?</p> <p>10 A. Yes.</p> <p>11 Q. Have you been involved in any</p> <p>12 other type of political campaigns?</p> <p>13 A. No.</p> <p>14 Q. Did you support Doug Jones when</p> <p>15 he ran for senate in 2017?</p> <p>16 A. I voted for him.</p> <p>17 Q. And why did you vote for him?</p> <p>18 A. Mainly because he was talking</p> <p>19 about the lottery bill. I mean, he had</p> <p>20 brought that up and was trying to get that</p> <p>21 passed. But that caught my interest.</p> <p>22 Q. The lottery bill?</p> <p>23 A. Yes. He was trying to get a</p>	<p style="text-align: right;">Page 77</p> <p>1 A. Yes, I do.</p> <p>2 MS. RUTAHINDURWA: Object to the</p> <p>3 form.</p> <p>4 A. They have good intentions.</p> <p>5 Q. (BY MR. MAULDIN) So, who do</p> <p>6 you -- I'm sorry. I'll let you finish your</p> <p>7 water.</p> <p>8 A. Oh, you're good. Go ahead.</p> <p>9 Q. Who do you think is going to win</p> <p>10 the race for Congressional District 2 between</p> <p>11 Shomari Figures and Caroleene Dobson?</p> <p>12 A. District 2? That's down in</p> <p>13 Mobile, right? I mean, I don't know neither</p> <p>14 one of those candidates and I really ain't</p> <p>15 been keeping up with it.</p> <p>16 Q. And that is not your district,</p> <p>17 correct?</p> <p>18 A. Right.</p> <p>19 Q. In the past ten years, have you</p> <p>20 felt like you wanted to be more politically</p> <p>21 engaged in the Democratic Party but could not</p> <p>22 be?</p> <p>23 A. No, I have not.</p>



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1 Q. Do you know whether it's true  
2 that in Alabama today, the candidate usually  
3 prefers non-Black voters as a Democrat?  
4 A. I mean, I can't say that, but it  
5 look like it.  
6 Q. Do you know if the same is true  
7 nationally?  
8 A. No, I do not. I don't know.  
9 Q. Go back to Democrats. Does it  
10 matter to you whether an official is white or  
11 Black?  
12 A. It doesn't.  
13 Q. It doesn't. Do you care more  
14 about party affiliation than you do race for  
15 a candidate?  
16 A. What you mean by that?  
17 Q. So, do you care more if a  
18 candidate is Republican or Democrat than you  
19 do whether they're white or Black?  
20 A. It really -- it really doesn't  
21 matter as long as -- as long as they're  
22 helping me.  
23 Q. And do you know who your state

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1 senator is?  
2 A. My state senator?  
3 Q. Yes.  
4 A. It just changed. It ain't Doug  
5 Jones no more. I totally forgot his name.  
6 Tommy Tuberville is one of them, I know.  
7 Q. What about your mayor?  
8 A. Mayor is Woodfin.  
9 Q. And --  
10 A. Randall Woodfin.  
11 Q. And what is his race?  
12 A. Black.  
13 Q. Do you know who your county  
14 commissioner is?  
15 A. County commissioner? It's on the  
16 tip of my tongue. I can't remember his name  
17 either. I'm sorry.  
18 Q. What about your city council  
19 member?  
20 A. That just changed, too. It was  
21 Steve Holt, but it's not no more.  
22 Q. Who was?  
23 A. It was Steve Holt.

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1 Q. And do you know his race?  
2 A. He's Black.  
3 Q. Can you think of any other local  
4 officials who represent you who are Black?  
5 A. Any other officials? I mean, not  
6 by name, but I can see them by face because  
7 they come by a lot.  
8 Q. And do you know if white voters  
9 in Alabama usually prefer Republican  
10 candidates?  
11 A. I can't say. I don't know.  
12 Q. Well, would it surprise you if  
13 they did?  
14 A. No, it doesn't. I mean, I work  
15 with a few of them.  
16 Q. So, why do you think white voters  
17 in Alabama who vote for Republican candidates  
18 support Republicans?  
19 A. I mean, now, I could really --  
20 that question right there got two sides  
21 because I have a co-worker that is white.  
22 And, basically, me and him was just talking  
23 probably about a week ago. He don't care

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1 who, if it's Republican or Democrat, as long  
2 as -- he's just like me, as long they're  
3 going to help him in general.  
4 But, like I said, majority --  
5 you've got the majority of whites, some  
6 whites that they'll vote Republican and  
7 you've got some that vote Democrat. I mean,  
8 it ain't -- it ain't -- it ain't equal, but,  
9 I mean, it's floating around.  
10 Q. So, do you think white voters in  
11 Alabama support Republicans because they're  
12 racist?  
13 A. I wouldn't say -- I don't know.  
14 I mean, I just know the majority of them vote  
15 Republican.  
16 Q. Do you think Alabama's history of  
17 discrimination has anything to do with white  
18 voters supporting Republicans?  
19 A. Sometimes it does.  
20 MS. RUTAHINDURWA: Object to  
21 form.  
22 Q. (BY MR. MAULDIN) So, why do you  
23 think that?

<p style="text-align: right;">Page 82</p> <p>1 A. Why do I think that?</p> <p>2 Q. Yes.</p> <p>3 A. I mean, sometimes it shows, I'll</p> <p>4 put it like that. And what I mean by show,</p> <p>5 like, you could tell sometimes on these jobs,</p> <p>6 like, the buddy buddy system. And the only</p> <p>7 reason I call it the buddy buddy system is --</p> <p>8 basically is I have a lot of -- a lot of</p> <p>9 white foremans that are buddies, but they</p> <p>10 don't know nothing about the job. And you</p> <p>11 can -- you can basically -- you can -- you</p> <p>12 can tell because you get asked questions, and</p> <p>13 they don't know the answer. Or you could be</p> <p>14 on the job and try to demonstrate to them,</p> <p>15 and they know things just to get the job</p> <p>16 done, but they can't even tell you nothing</p> <p>17 about it. It's -- sometimes it make it real</p> <p>18 difficult, sometimes it don't.</p> <p>19 Q. So, do you think that with your</p> <p>20 employer, that the foremen have been promoted</p> <p>21 because of their race?</p> <p>22 A. No. Yes. Not because of their</p> <p>23 race. It's because they're buddies. But the</p>	<p style="text-align: right;">Page 84</p> <p>1 didn't let it get to me. And we rode off</p> <p>2 instead of violence. It could have been bad,</p> <p>3 but it turned out straight.</p> <p>4 Q. And do you experience</p> <p>5 discrimination today?</p> <p>6 A. I mean, on the job, you can see</p> <p>7 it. I mean, I wouldn't say I firsthand off</p> <p>8 see it because sometimes I see it, sometimes</p> <p>9 I don't. But the majority of the time, I see</p> <p>10 it happen to other folks every day, on the</p> <p>11 job especially.</p> <p>12 Q. Can you think of some examples?</p> <p>13 A. Promotions. I mean, we have a</p> <p>14 lot of Black foremans, a lot of Black</p> <p>15 leadmens they've got skill and ability. And</p> <p>16 that goes back to I said about the buddy</p> <p>17 buddy system. You overlook this man because</p> <p>18 that's your buddy, which is white. And</p> <p>19 you're going to look out for him. But you've</p> <p>20 got this Black man that's got skill and</p> <p>21 ability and you won't promote him.</p> <p>22 Q. And so, you know, you talked</p> <p>23 about the buddy buddy system earlier.</p>
<p style="text-align: right;">Page 83</p> <p>1 majority of them, if you call buddy buddy, I</p> <p>2 mean, the majority of them are white.</p> <p>3 Q. So, growing up in Alabama, did</p> <p>4 you experience discrimination?</p> <p>5 A. I did a couple times.</p> <p>6 Q. Can you give me some examples?</p> <p>7 A. One example -- one example,</p> <p>8 basically, me and my dad was driving down the</p> <p>9 road. And it was a bad storm. And our</p> <p>10 neighborhood that we live in, it was mixed.</p> <p>11 And a tree had fell in the middle of the</p> <p>12 road. Basically, we had to go through this</p> <p>13 man's yard, which was white. And we had to</p> <p>14 go through his yard just to get around the</p> <p>15 tree. The man got upset, came outside,</p> <p>16 started calling my daddy names. We got out</p> <p>17 of the truck, almost had got in a</p> <p>18 confrontation, but, you know, I grabbed my</p> <p>19 daddy and we got back in the truck. Like,</p> <p>20 words can't hurt you. And, basically, the</p> <p>21 man called us the N word. And we didn't</p> <p>22 think nothing of it. We didn't let it get to</p> <p>23 where -- it almost got to my daddy, but I</p>	<p style="text-align: right;">Page 85</p> <p>1 A. Uh-huh.</p> <p>2 Q. Do you think there have been</p> <p>3 Black co-workers of yours that have benefited</p> <p>4 from that as well?</p> <p>5 A. No. They hadn't.</p> <p>6 Q. And are there any other</p> <p>7 experiences you've had with discrimination</p> <p>8 today?</p> <p>9 A. Not recently, or none. None</p> <p>10 other than that.</p> <p>11 Q. And do you know others who</p> <p>12 experienced discrimination today other than</p> <p>13 the employment that was discussed?</p> <p>14 A. No, other than my dad. That's</p> <p>15 it.</p> <p>16 Q. Other than who?</p> <p>17 A. My daddy when we had that little</p> <p>18 incident.</p> <p>19 Q. And do you know roughly when that</p> <p>20 would have been?</p> <p>21 A. That was at a young age. I was</p> <p>22 probably -- when I was probably, like, ten or</p> <p>23 eleven.</p>

<p style="text-align: right;">Page 86</p> <p>1 Q. Do you think things are better in 2 Alabama today than when you were growing up, 3 for example, with respect to race relations? 4 A. I mean, I wouldn't say better, 5 but it's -- it's kind of like -- I mean, 6 certain parts of Alabama you can go to that 7 you'll know you'll experience racists. But 8 there's certain parts that you know that you 9 won't. I mean, it just -- it just depends on 10 where you go. 11 Q. And how do -- oh, I'm sorry. 12 A. Go ahead. 13 Q. No, finish. 14 A. I was just saying, like -- I 15 mean, what I mean by certain parts is, 16 basically, there's certain areas in Alabama 17 that you know you'll experience racist. 18 Q. And what areas would those be? 19 A. One is Tuscaloosa. You go in the 20 wrong part, turn down the wrong road, you'll 21 experience it. 22 Q. So, have you experienced racism 23 in Tuscaloosa?</p>	<p style="text-align: right;">Page 88</p> <p>1 A. Jobs? I'm going to say jobs have 2 improved, yeah, because you're losing some -- 3 you're losing some plants. I mean, you're 4 losing some jobs in Alabama. One of them is 5 the little place I used to work at, CVS 6 warehouse. It shut down two years ago, two 7 or three years ago, I think. 8 Q. And do you think jobs have 9 improved for Black citizens in Alabama -- 10 A. I mean, I wouldn't know that. 11 Q. -- in particular? 12 THE COURT REPORTER: I didn't 13 catch that. 14 MR. MAULDIN: I'm sorry? 15 THE COURT REPORTER: I didn't 16 catch the very end of what you said. 17 MR. MAULDIN: Oh, just in 18 particular is what I said. Black citizens of 19 Alabama in particular. 20 Q. What about have -- has voting for 21 Black Alabamians improved? 22 A. What have improved by voting? 23 What you mean by that?</p>
<p style="text-align: right;">Page 87</p> <p>1 A. I mean, I haven't, but I know 2 some -- I know some people that have turned 3 down the wrong road. 4 Q. And do you know what happened to 5 them -- 6 A. I mean -- 7 Q. -- in Tuscaloosa? 8 A. -- flat tires, they had thrown 9 rocks at their cars. 10 That's about it. 11 Q. Do you know when that would have 12 been? 13 A. It was some years back. It was 14 probably about ten, fifteen years back, 15 something like that. 16 Q. Are there any other examples like 17 that that you can recall? 18 A. No, not racist. Not that I can 19 recall. 20 Q. So, do you think that education 21 in Alabama has improved? 22 A. No. No, it hasn't. 23 Q. What about jobs?</p>	<p style="text-align: right;">Page 89</p> <p>1 Q. Just access to the ballot. So, 2 your voter registration. 3 A. I mean, it's still the same to 4 me. When I go to the polls, it's still the 5 same. 6 MR. MAULDIN: All right. Do 7 y'all want to take one more about ten-minute 8 break? I think we might be close to wrapping 9 up. I'll just look over my notes a little 10 bit. 11 12 (Whereupon, a brief recess was 13 taken.) 14 15 Q. (BY MR. MAULDIN) All right. So, 16 earlier at the beginning of your deposition, 17 you said that Representative Sewell didn't 18 have enough help. 19 A. Uh-huh. 20 Q. And so, what do you think would 21 help her? 22 A. Getting another -- I mean, 23 getting another -- getting another</p>


<p style="text-align: right;">Page 90</p> <p>1 representative that's basically a Democrat  2 just like her to help basically in Jefferson  3 County. I mean, you've got the county split  4 up -- split up like that. I mean, that'll  5 help out a lot, having another district.  6 That would have been District what, I think,  7 6, Shelby and -- with the split.  8 Q. I'm not sure what you're  9 referring to. I mean, you can take a look  10 at --  11 A. I mean, you can see it right  12 there.  13 Q. Oh, this one (indicating)?  14 A. Like, Jefferson County is split  15 up in two districts, 7 and 6, right? If  16 County Number 6 was a Democrat, which she'll  17 probably have some help.  18 Q. And so, why do you think this  19 litigation could provide her the help she  20 needs?  21 A. If you redistrict the lines, I  22 mean, she'll actually get some help. I mean,  23 you'll split -- you'll split up the Black</p>	<p style="text-align: right;">Page 92</p> <p>1 end?  2 A. I said, they'll represent Ms.  3 Harris.  4 Q. And what do you mean by that?  5 A. I mean, Democrats will show up  6 for her even though, basically, she's -- she  7 basically will favor -- favoring a lot what  8 the Democrats have been trying to push  9 lately.  10 Q. And do you think that's true for  11 all Democrats, even white Democrats?  12 A. I mean, I can't say.  13 Q. So, going back to the maps, do  14 you think that counties like Mobile County  15 should be kept together in one district?  16 A. Yes.  17 Q. And what about Montgomery County?  18 A. It should be kept in one  19 district, too.  20 Q. All right.  21 MR. MAULDIN: So, I have no  22 further questions at this time, but if other  23 counsel has questions.</p>
<p style="text-align: right;">Page 91</p> <p>1 voters in District 7, and it will basically  2 be in another district.  3 Q. Do you think Alabama voters are  4 going to view Kamala Harris more favorably or  5 less favorably than Joe Biden?  6 A. Just Alabama?  7 Q. Yes.  8 A. Oh. Hold on. Say that question  9 one more time. Let me make sure I understand  10 it.  11 Q. So, do you think that Alabama  12 voters, are they going to view Kamala Harris  13 more favorably than they do Joe Biden as a  14 Democratic nominee for Alabama?  15 A. I mean, you know Alabama is a  16 Republican state, right? So, I mean, the  17 majority of the Republicans are going to vote  18 Republican and they ain't probably going to  19 vote for a Democrat.  20 Q. What about the Democrats?  21 A. I mean, the Democrats, yes, I  22 believe they'll represent Ms. Harris.  23 Q. What was that you said at the</p>	<p style="text-align: right;">Page 93</p> <p>1 MR. TAUNTON: I may have just a  2 couple.  3 THE WITNESS: Okay.  4  5 EXAMINATION BY MR. TAUNTON:  6  7 Q. Good morning. I'm Michael  8 Taunton. I represent a different defendant.  9 I represent the legislative defendants,  10 Representative Pringle and Senator  11 Livingston. I'm not going to have very many  12 questions for you. But just a couple of  13 things that you said that, you know, I was  14 kind of curious about, wanted to follow up  15 on.  16 You mentioned several times in  17 your testimony that you'd like to see certain  18 roads fixed, that roads in your neighborhood  19 were in poor condition --  20 A. Right.  21 Q. -- and the surrounding area,  22 right?  23 A. Right.</p>

<p style="text-align: right;">Page 94</p> <p>1 Q. I was just curious, you know,  2 what -- well, let me ask this question first:  3 Remind me your address. I believe you gave  4 it at the beginning, but I didn't catch it.  5 And I'm sorry for that.  6 A. It's 1539 Martin Avenue. That's  7 in Birmingham, Alabama, 3 --  8 Q. And is that Birmingham city, City  9 of Birmingham?  10 A. Yes.  11 Q. Okay. Because living in this  12 area, you know, I say I'm from Birmingham.  13 A. Yeah.  14 Q. You know, we all do.  15 A. Uh-huh.  16 Q. So, who is -- the current mayor  17 of Birmingham, what is his political party?  18 A. Democrat.  19 Q. Okay. And the current city  20 council -- do you know how many city  21 councilors there are?  22 A. I believe it was -- is it nine?  23 I know it was eight because -- I'm in</p>	<p style="text-align: right;">Page 96</p> <p>1 Q. Are there any others?  2 A. I mean, it's a few, but I  3 can't -- I can't remember the road's name.  4 Q. Do you know, is Jefferson  5 Avenue -- whose responsibility is it to fix  6 that road? Do you have any idea who  7 maintains it?  8 A. I mean, it got to be the mayor.  9 Q. Okay. So, you think it's a City  10 of Birmingham road?  11 A. Yes. Well, it's a county road,  12 too.  13 Q. It's also a county road?  14 A. Yes.  15 Q. Okay. The other roads that you  16 would like to see fixed --  17 A. Highways.  18 Q. Which highway?  19 A. Basically, the one I travel every  20 day. It's I-20.  21 Q. And you drive that -- you know,  22 where do you drive that from? What stretch  23 of road are you on there?</p>
<p style="text-align: right;">Page 95</p> <p>1 District 8.  2 Q. Do you know which party currently  3 has the majority representation on the city  4 council?  5 A. No, I do not because it changed  6 up.  7 Q. Okay. I think you were -- you  8 were asked this earlier and maybe you  9 couldn't recall. Do you recall a Republican  10 mayor of Birmingham? Do you have any  11 recollection of one?  12 A. No.  13 Q. And you mentioned some questions  14 about roads you wanted fixed. What roads in  15 your neighborhood specifically would you like  16 to see fixed?  17 A. Specifically?  18 Q. Yeah.  19 A. I mean, I can't -- I mean, one of  20 them is Jefferson, Jefferson Avenue.  21 Q. Okay.  22 A. There's some major problems on  23 that one.</p>	<p style="text-align: right;">Page 97</p> <p>1 A. I mean, if I'm traveling to  2 Atlanta or anywhere out of state going  3 towards Georgia or Anniston, Oxford, Pell  4 City.  5 Q. So, traveling east of Birmingham  6 headed that direction?  7 A. Yes.  8 Q. Do you go to Atlanta frequently?  9 A. I'll say probably twice a month.  10 Q. Okay.  11 A. Well --  12 Q. To Braves games? Are you a  13 Braves fan?  14 A. Yes. Yeah. But football season,  15 Atlanta Falcons.  16 Q. And you believe I-20 needs repair  17 east of Birmingham?  18 A. Yeah. I-20 and 65. I'm going to  19 say 65, too. I-65. And that's going south.  20 Q. Now, when you're traveling I-20  21 east of Birmingham, is that inside your  22 congressional district, Congressional  23 District 7; do you know?</p>



<p style="text-align: right;">Page 98</p> <p>1 A. It should be. It's in Jefferson.</p> <p>2 Q. But headed to Atlanta, is</p> <p>3 Anniston in Jefferson County?</p> <p>4 A. Is it in Jefferson County, no.</p> <p>5 Q. Yeah. And do you think I-20</p> <p>6 needs repair in those districts, in that</p> <p>7 section near Anniston?</p> <p>8 A. I mean, you've got some other</p> <p>9 parts, but you've got some of them parts</p> <p>10 right before you even get there. You've got</p> <p>11 some in Birmingham.</p> <p>12 Q. I-20 and I-65, is that being</p> <p>13 traveled entirely by Black citizens in</p> <p>14 Alabama?</p> <p>15 A. Yes.</p> <p>16 Q. It is? White citizens in Alabama</p> <p>17 don't drive on those roads?</p> <p>18 A. Yes, they will drive on it.</p> <p>19 Everybody drive on it.</p> <p>20 Q. Do you think that repairs to I-20</p> <p>21 or I-65 would be issues that would be unique</p> <p>22 to Black voters in Alabama?</p> <p>23 A. Do it need to be a need to it?</p>	<p style="text-align: right;">Page 100</p> <p>1 V. Merrill in June 2019?</p> <p>2 A. Yes.</p> <p>3 Q. Okay. So, apart from this</p> <p>4 deposition, you've taken one deposition</p> <p>5 prior --</p> <p>6 A. Yes.</p> <p>7 Q. -- is that right?</p> <p>8 A. I took one.</p> <p>9 MS. RUTAHINDURWA: That's all.</p> <p>10 THE WITNESS: Sorry about that.</p> <p>11 MR. TAUNTON: Just one follow-up</p> <p>12 on that.</p> <p>13</p> <p>14 FURTHER EXAMINATION BY MR. TAUNTON:</p> <p>15</p> <p>16 Q. Do you recall -- and I just</p> <p>17 haven't looked, so I don't know. Did you</p> <p>18 also provide any trial testimony?</p> <p>19 A. Trial testimony?</p> <p>20 Q. Did you testify at trial --</p> <p>21 A. No, I did not.</p> <p>22 Q. -- or evidentiary hearing or</p> <p>23 anything like that in that case?</p>
<p style="text-align: right;">Page 99</p> <p>1 Q. Do you think -- let me phrase the</p> <p>2 question this way: Do you think if repairs</p> <p>3 were needed to I-20 or I-65 in Alabama, the</p> <p>4 white voters would also want to see repairs</p> <p>5 to I-20 or I-65?</p> <p>6 A. Yes, they would, too.</p> <p>7 MR. TAUNTON: I'm good. I don't</p> <p>8 have any more questions.</p> <p>9 THE WITNESS: Okay.</p> <p>10 MR. TAUNTON: Thank you.</p> <p>11 THE WITNESS: Uh-huh.</p> <p>12 MS. RUTAHINDURWA: I just have</p> <p>13 one clarification question.</p> <p>14</p> <p>15 EXAMINATION BY MS. RUTAHINDURWA:</p> <p>16</p> <p>17 Q. You were asked earlier -- do you</p> <p>18 recall being asked if you had taken a</p> <p>19 deposition prior?</p> <p>20 A. (Witness nods head.)</p> <p>21 Q. And I believe you said no to that</p> <p>22 answer. I just want to clarify. Do you</p> <p>23 recall sitting for a deposition in Chestnut</p>	<p style="text-align: right;">Page 101</p> <p>1 A. No, I did not.</p> <p>2 MR. TAUNTON: Okay. Nothing.</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 style="text-align: right;">Page 102</p> <p style="text-align: center;">C E R T I F I C A T E</p> <p>STATE OF ALABAMA ) JEFFERSON COUNTY )</p> <p>I hereby certify that the above and foregoing deposition was taken down by me in stenotype, and the questions and answers thereto were transcribed by means of computer-aided transcription, and that the foregoing represents a true and correct transcript of the testimony given by said witness upon said hearing.</p> <p>I further certify that I am neither of counsel, nor of kin to the parties to the action, nor am I an anywise interested in the result of said cause.</p> <p> MICHELLE L. PARVIN Certified Court Reporter License Number 126 Commission expires 9/30/24 Notary Public expires 1/26/26</p>	<p style="text-align: right;">Page 104</p> <p>Singleton, Bobby, Et Al. v. Allen, Wes, Et Al. Rodney Allen Love (#6811187)</p> <p style="text-align: center;">E R R A T A S H E E T</p> <p>PAGE____ LINE____ CHANGE____</p> <p>REASON____</p> <p>PAGE____ LINE____ CHANGE____</p> <p>REASON____</p> <p>PAGE____ LINE____ CHANGE____</p> <p>REASON____</p> <p>PAGE____ LINE____ CHANGE____</p> <p>REASON____</p> <p>PAGE____ LINE____ CHANGE____</p> <p>REASON____</p> <p>PAGE____ LINE____ CHANGE____</p> <p>REASON____</p> <p>Rodney Allen Love Date</p>
<p style="text-align: right;">Page 103</p> <p>Rodney Allen Love c/o Makeba Rutahindurwa, Esquire mrutahindurwa@elias.law August 21, 2024 RE: Singleton, Bobby, Et Al. v. Allen, Wes, Et Al. 8/7/2024, Rodney Allen Love (#6811187)</p> <p>The above-referenced transcript is available for review.</p> <p>Within the applicable timeframe, the witness should read the testimony to verify its accuracy. If there are any changes, the witness should note those with the reason, on the attached Errata Sheet.</p> <p>The witness should sign the Acknowledgment of Deponent and Errata and return to the deposing attorney. Copies should be sent to all counsel, and to Veritext at litsup-ga@veritext.com</p> <p>Return completed errata within 30 days from receipt of testimony.</p> <p>If the witness fails to do so within the time allotted, the transcript may be used as if signed.</p> <p>Yours, Veritext Legal Solutions</p>	<p style="text-align: right;">Page 105</p> <p>Singleton, Bobby, Et Al. v. Allen, Wes, Et Al. Rodney Allen Love (#6811187)</p> <p style="text-align: center;">A C K N O W L E D G E M E N T O F D E P O N E N T</p> <p>I, Rodney Allen Love, do hereby declare that I have read the foregoing transcript, I have made any corrections, additions, or changes I deemed necessary as noted above to be appended hereto, and that the same is a true, correct and complete transcript of the testimony given by me.</p> <p>Rodney Allen Love Date</p> <p>*If notary is required</p> <p style="text-align: center;">S U B S C R I B E D A N D S W O R N T O B E F O R E M E T H I S</p> <p style="text-align: center;">DAY OF _____, 20__.</p> <p style="text-align: center;">NOTARY PUBLIC</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.

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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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