

BOBBY SINGLETON, et al.

vs

WES ALLEN, et al.

REV. ANDREW WALKER

July 11, 2024

Rev. Andrew Walker

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<p style="text-align: right;">Page 1</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 CIVIL ACTION NUMBER</p> <p>6 2:21-cv-1291-AMM</p> <p>7</p> <p>8 BOBBY SINGLETON, et al.,</p> <p>9 Plaintiff(s),</p> <p>10 vs.</p> <p>11 WES ALLEN, et al.,</p> <p>12 Defendant(s).</p> <p>13</p> <p>14 Civil Action Number</p> <p>15 2:21-cv-01530-AMM</p> <p>16</p> <p>17 EVAN MILLIGAN, et al.</p> <p>18 Plaintiff(s)</p> <p>19 Vs.</p> <p>20 WES ALLEN, et al.</p> <p>21 Defendant(s).</p> <p>22 DEPOSITION TESTIMONY OF:</p> <p>23 REVEREND ANDREW WALKER</p>	<p style="text-align: right;">Page 3</p> <p>1 STIPULATION</p> <p>2 IT IS STIPULATED AND AGREED by and</p> <p>3 between the parties through their respective</p> <p>4 counsel that the deposition of REVEREND ANDREW</p> <p>5 WALKER may be taken before David Miller, Registered</p> <p>6 Merit Reporter and Notary Public, at the offices of</p> <p>7 Balch & Bingham, 445 Dexter Avenue, Suite 800,</p> <p>8 Montgomery, Alabama, on July 11, 2024, commencing</p> <p>9 at approximately 1:00 p.m.</p> <p>10 IT IS FURTHER STIPULATED AND AGREED that</p> <p>11 the signature to and the reading of the deposition</p> <p>12 by the witness is NOT waived, the deposition to</p> <p>13 have the same force and effect as if full</p> <p>14 compliance had been had with all laws and rules of</p> <p>15 Court relating to the taking of depositions.</p> <p>16 IT IS FURTHER STIPULATED AND AGREED that</p> <p>17 it shall not be necessary for any objections to be</p> <p>18 made by counsel to any questions, except as to form</p> <p>19 or leading questions, and that counsel for the</p> <p>20 parties may make objections and assign grounds at</p> <p>21 the time of trial or at the time said deposition is</p> <p>22 offered in evidence, or prior thereto.</p> <p>23</p>
<p style="text-align: right;">Page 2</p> <p>1 IN THE UNITED STATES DISTRICT COURT</p> <p>2 NORTHERN DISTRICT OF ALABAMA</p> <p>3 SOUTHERN DIVISION</p> <p>4</p> <p>5 Civil Action Number</p> <p>6 2:21-cv-01536-AMM</p> <p>7</p> <p>8 MARCUS CASTER, et al.</p> <p>9 Plaintiff(s),</p> <p>10 Vs</p> <p>11 WES ALLEN, et al.</p> <p>12 Defendant(s)</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 4</p> <p>1 INDEX</p> <p>2</p> <p>3 EXAMINATION BY: PAGE NO.</p> <p>4 Mr. Walker 7</p> <p>5 Certificate 66</p> <p>6</p> <p>7</p> <p>8</p> <p>9 INDEX OF EXHIBITS</p> <p>10 EXHIBITS PAGE NO.</p> <p>11 DEF EX 1 Deposition notice 8</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>

Rev. Andrew Walker

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<p style="text-align: right;">Page 5</p> <p style="text-align: center;">A P P E A R A N C E S</p> <p>1</p> <p>2</p> <p>3</p> <p>4 FOR THE PLAINTIFF(S):</p> <p>5 JAMES U. BLACKSHER LAW OFFICE</p> <p>6 James U. Blacksher (Virtual)</p> <p>7 825 Linwood Road</p> <p>8 Birmingham, Alabama 35222</p> <p>9</p> <p>10 PENN & SEABORN</p> <p>11 Myron C. Penn</p> <p>12 1442 South Eufaula Avenue</p> <p>13 Eufaula, Alabama 36027</p> <p>14</p> <p>15</p> <p>16 FOR THE DEFENDANT, WES ALLEN:</p> <p>17 OFFICE OF THE ATTORNEY GENERAL,</p> <p>18 STATE OF ALABAMA</p> <p>19 Misty S. Fairbanks Messick (Virtual)</p> <p>20 501 Washington Avenue</p> <p>21 Montgomery, Alabama 36130</p> <p>22</p> <p>23</p>	<p style="text-align: right;">Page 7</p> <p>1 I, David L. Miller, a Registered Merit</p> <p>2 Reporter, and a Notary Public, acting as</p> <p>3 Commissioner, certify that on this date, pursuant</p> <p>4 to the Federal Rules of Civil Procedure, and the</p> <p>5 foregoing stipulation of counsel, there came before</p> <p>6 me at the offices of Balch & Bingham, 445 Dexter</p> <p>7 Avenue, Suite 800, Montgomery, Alabama, commencing</p> <p>8 at approximately 1:00 p.m. on July 11, 2024,</p> <p>9 REVEREND ANDREW WALKER, witness in the above cause,</p> <p>10 for oral examination, whereupon the following</p> <p>11 proceedings were had:</p> <p>12</p> <p>13 REVEREND ANDREW WALKER,</p> <p>14 having been first duly sworn, was examined and</p> <p>15 testified as follows:</p> <p>16</p> <p>17 STENOGRAPHIC REPORTER: Same</p> <p>18 stipulations, read and sign?</p> <p>19 MR. PENN: Yes.</p> <p>20 MR. WALKER: Yes, please.</p> <p>21</p> <p>22 EXAMINATION BY MR. WALKER:</p> <p>23 Q. Reverend Walker, we met a little</p>
<p style="text-align: right;">Page 6</p> <p style="text-align: center;">A P P E A R A N C E S</p> <p>1</p> <p>2</p> <p>3</p> <p>4 FOR SENATOR LIVINGSTON and REPRESENTATIVE PRINGLE:</p> <p>5 BALCH & BINGHAM, LLP</p> <p>6 Dorman Walker</p> <p>7 105 Tallapoosa Street</p> <p>8 Suite 200</p> <p>9 Montgomery, Alabama 36104</p> <p>10</p> <p>11 BALCH & BINGHAM, LLP</p> <p>12 Michael P. Taunton</p> <p>13 (Virtual)</p> <p>14 1901 Sixth Avenue North</p> <p>15 Suite 1500</p> <p>16 Birmingham, Alabama 35203</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 8</p> <p>1 while ago, but, for the record, I'm Dorman Walker</p> <p>2 from the law firm of Balch-Bingham. I represent</p> <p>3 the Legislators who are in this case, Singleton,</p> <p>4 and I'm going to be taking your deposition today.</p> <p>5 So thank you for coming in.</p> <p>6 And would you state your name, for</p> <p>7 the record, please, sir.</p> <p>8 A. My name is Andrew L. Walker.</p> <p>9 Q. Thank you very much. That's a great</p> <p>10 deposition voice.</p> <p>11 A. Yes.</p> <p>12 Q. Let me show you what I have marked</p> <p>13 as Defendant's Exhibit 1.</p> <p>14</p> <p>15 (WHEREUPON, a document was marked</p> <p>16 Defendant's Exhibit 1 and is attached to the</p> <p>17 original transcript.)</p> <p>18</p> <p>19 Q. And I will tell you that that is the</p> <p>20 notice for your deposition.</p> <p>21 A. Okay.</p> <p>22 Q. And let me come back to that and go</p> <p>23 over some of the rules for the deposition.</p>

<p style="text-align: right;">Page 9</p> <p>1 Sir, have you ever been deposed</p> <p>2 before?</p> <p>3 A. Have I ever been what?</p> <p>4 Q. Had your deposition taken like we</p> <p>5 are doing now.</p> <p>6 A. Yes.</p> <p>7 Q. Can you tell me how many times.</p> <p>8 A. Maybe twice. Two.</p> <p>9 Q. Maybe twice?</p> <p>10 A. Uh-huh (Nodding head).</p> <p>11 Q. Can you tell me when those</p> <p>12 depositions were? Approximately is fine.</p> <p>13 A. Probably back in 1989 I did one with</p> <p>14 Beasley Allen. And I can't think of the other</p> <p>15 time, but I know it's somewhere in the '70s.</p> <p>16 Q. Let's go back to the one that you</p> <p>17 had in 1989. Were Beasley Allen your lawyers or</p> <p>18 were you a witness?</p> <p>19 A. They were my lawyers.</p> <p>20 Q. Can you tell me what that lawsuit</p> <p>21 was about?</p> <p>22 A. A car accident.</p> <p>23 Q. A car accident.</p>	<p style="text-align: right;">Page 11</p> <p>1 Federal Court?</p> <p>2 A. Yes.</p> <p>3 Q. Is there anything -- any reason</p> <p>4 today that you can't answer my questions fully and</p> <p>5 truthfully?</p> <p>6 For example, have you taken any</p> <p>7 medication that might interfere with your</p> <p>8 deposition?</p> <p>9 A. No, there's no reason.</p> <p>10 Q. I'm going to be asking you</p> <p>11 questions. The purpose of the deposition today is</p> <p>12 that you're, as you know, a named plaintiff in the</p> <p>13 Singleton lawsuit, okay?</p> <p>14 A. Yes.</p> <p>15 Q. And so what I want to find out as a</p> <p>16 lawyer for the defense side is what does Reverend</p> <p>17 Walker -- what can he tell me about the claims</p> <p>18 being made in this lawsuit.</p> <p>19 Now, if it were a car wreck, like</p> <p>20 the lawsuit you had earlier, and you were involved</p> <p>21 in the wreck, I would expect you to have a lot of</p> <p>22 information about the car wreck.</p> <p>23 A. Uh-huh (Nodding head).</p>
<p style="text-align: right;">Page 10</p> <p>1 And they represented you in the car</p> <p>2 accident?</p> <p>3 A. Yes.</p> <p>4 Q. And your deposition was in that</p> <p>5 case?</p> <p>6 A. Yes.</p> <p>7 Q. Okay. And what can you tell me</p> <p>8 about the other time that you were deposed?</p> <p>9 A. I can't hardly remember. But I know</p> <p>10 I was deposed another time, but it wasn't that</p> <p>11 important.</p> <p>12 Q. Do you think it was before this</p> <p>13 Beasley Allen deposition?</p> <p>14 A. Before Beasley Allen. It was</p> <p>15 probably in the '70s.</p> <p>16 Q. Well, since it's been awhile since</p> <p>17 you have been deposed let's go over briefly the</p> <p>18 rules for a deposition.</p> <p>19 A. Okay.</p> <p>20 Q. Do you understand that you are under</p> <p>21 oath?</p> <p>22 A. Yes.</p> <p>23 Q. The same as if you were sitting in</p>	<p style="text-align: right;">Page 12</p> <p>1 Q. But this is a Voting Rights claim.</p> <p>2 These are a bit more metaphysical and you may not</p> <p>3 have a lot of information. And if you don't,</p> <p>4 that's fine; just say, "I don't know."</p> <p>5 A. Uh-huh (Nodding head).</p> <p>6 Q. As we go through the deposition, as</p> <p>7 you can see, our court reporter, David, here is</p> <p>8 taking down everything we say.</p> <p>9 A. Yes.</p> <p>10 Q. So it's necessary for each of us to</p> <p>11 wait till the other one finishes speaking before we</p> <p>12 say anything.</p> <p>13 And also I will be asking you</p> <p>14 questions. And, again, because he is taking down</p> <p>15 everything, please respond with either a yes, a no,</p> <p>16 or a narrative response. You can't, for example,</p> <p>17 shake your head because he can't take that down.</p> <p>18 A. Okay. Yes.</p> <p>19 Q. During the deposition your lawyer,</p> <p>20 Mr. Penn, might say, "Object the form." If he</p> <p>21 does, he's telling me that he thinks that I need to</p> <p>22 ask that question in another way, but you can go</p> <p>23 ahead and answer the question.</p>

<p style="text-align: right;">Page 13</p> <p>1 If he thinks that I'm asking a</p> <p>2 question that he doesn't want you to answer, he</p> <p>3 will let you know. He will say, "Don't answer the</p> <p>4 question," and we will deal with that at that time,</p> <p>5 okay?</p> <p>6 A. Okay.</p> <p>7 MR. TAUNTON: Dorman, and, Reverend,</p> <p>8 real quick. There is a bottle of water directly in</p> <p>9 the path of the -- thank you. Right there.</p> <p>10 Sorry about that.</p> <p>11 THE WITNESS: You're good.</p> <p>12 Q. (BY MR. WALKER) We can take a break.</p> <p>13 Usually in depositions we take a break on the hour.</p> <p>14 I'm kind of thinking, based on this morning, that</p> <p>15 this deposition may not last that long.</p> <p>16 If it does, or if we reach a point</p> <p>17 where you feel like you want to take a break for</p> <p>18 some reason, just say, "Let's take a break;" that's</p> <p>19 perfectly fine.</p> <p>20 A. Okay.</p> <p>21 Q. The only rule is if I have asked you</p> <p>22 a question, you need to answer the question before</p> <p>23 we go on the break, okay?</p>	<p style="text-align: right;">Page 15</p> <p>1 A. It was yesterday --</p> <p>2 Q. Okay.</p> <p>3 A. -- I think, uh-huh (Nodding head).</p> <p>4 Q. I didn't mean to cut off.</p> <p>5 A. It was yesterday.</p> <p>6 Q. Sir, do you recall what time that</p> <p>7 was?</p> <p>8 A. No, sir.</p> <p>9 Q. The morning or afternoon?</p> <p>10 A. It was morning.</p> <p>11 Q. Morning. Okay.</p> <p>12 And do you recall how long it</p> <p>13 lasted, about?</p> <p>14 A. Maybe thirty minutes.</p> <p>15 Q. Thirty minutes. That's all. Okay.</p> <p>16 And who all do you recall was on</p> <p>17 that telephone call?</p> <p>18 A. A guy named Jim, and Attorney Penn.</p> <p>19 Q. Do you know if that guy named Jim</p> <p>20 was the attorney named Jim Blacksher?</p> <p>21 A. Yes.</p> <p>22 Q. Also Reverend Andrews was on that?</p> <p>23 A. Yes.</p>
<p style="text-align: right;">Page 14</p> <p>1 A. Okay.</p> <p>2 Q. Otherwise, any time you want.</p> <p>3 I showed you the notice of your</p> <p>4 deposition. And let's just start out by talking</p> <p>5 about what you might have done to prepare for your</p> <p>6 deposition.</p> <p>7 Did you do anything to prepare for</p> <p>8 your deposition today?</p> <p>9 A. Like what, for instance?</p> <p>10 Q. Well, did you meet with anyone to</p> <p>11 talk about this or -- I am not going to ask you --</p> <p>12 you can tell me if you met with Minister Penn or</p> <p>13 any of your lawyers, but don't tell me what he</p> <p>14 said.</p> <p>15 A. We talked yesterday, uh-huh (Nodding</p> <p>16 head). Maybe the day before yesterday.</p> <p>17 Q. Reverend Andrews mentioned he had</p> <p>18 had a phone call with Mr. Blacksher and Mr. Penn</p> <p>19 and he said that you also were on the call.</p> <p>20 Do you recall that phone call?</p> <p>21 A. Yes, sir.</p> <p>22 Q. Was that yesterday or the day</p> <p>23 before?</p>	<p style="text-align: right;">Page 16</p> <p>1 Q. Anyone else?</p> <p>2 A. That's it.</p> <p>3 Q. During that -- during that</p> <p>4 conference call did you have any documents that had</p> <p>5 been sent to you to look at during the conference</p> <p>6 call?</p> <p>7 A. No.</p> <p>8 Q. Have you looked at any documents in</p> <p>9 preparation for being deposed today?</p> <p>10 A. Yes.</p> <p>11 Q. Can you tell me, sir, what you</p> <p>12 looked at.</p> <p>13 A. Maybe what I was coming here for,</p> <p>14 you know, our purpose for being here.</p> <p>15 Q. Would that be the complaint?</p> <p>16 A. Yes.</p> <p>17 Q. Let me show you a copy of the Second</p> <p>18 Amended Complaint which is -- it's mislabeled. I</p> <p>19 seem to have come in here without a copy of the</p> <p>20 Second Amended Complaint, although I know I have</p> <p>21 one.</p> <p>22 Let me show you this right here. I</p> <p>23 will represent to you that this is the Second</p>

<p style="text-align: right;">Page 17</p> <p>1 Amended Complaint, which is the operative pleading 2 in this case, document number two ninety-nine. 3 Is that the document that you looked 4 at, sir? 5 A. No. 6 Q. No, it's not the document. 7 Did you look at something that had 8 maps or something like that? 9 Was it a redistricting plan for the 10 -- for example, something like that (Indicating)? 11 A. I saw something like that maybe six 12 months ago, but not yesterday. 13 Q. For the record, what I was showing 14 the Reverend Walker was the 2021 Alabama 15 Congressional Plan. And I think you just meant to 16 say you saw a map somewhat like this, not -- 17 A. Yes. 18 Q. Do you know if it was this 19 particular map you saw or it could have been -- 20 there is a lot of maps in this case and they tend 21 to look a lot alike. 22 A. I can't remember which one. 23 Q. Okay. That's fair.</p>	<p style="text-align: right;">Page 19</p> <p>1 Q. Have you discussed -- wait until I 2 completely finish, please. You are getting a 3 little close and it's harder for him. It's a very 4 normal thing to do. 5 A. Okay. 6 Q. But we have to go a little bit 7 slower and also you need to give a little bit of 8 time for your lawyer to make an objection if he 9 wants to. 10 Have you discussed this case -- 11 maybe I just asked you this question. I'm sorry if 12 I'm repeating myself. 13 Have you discussed this case with 14 any plaintiffs or any lawyers, not including 15 preparation -- preparing for this deposition? 16 A. No. 17 Q. Okay. Did you -- well, how did you 18 become a plaintiff in this lawsuit? I will ask 19 you. 20 A. Down in Union Springs my church -- 21 we have Voters League meetings about once every 22 three months. 23 Q. Did you say Voters League?</p>
<p style="text-align: right;">Page 18</p> <p>1 So you looked at some documents -- 2 at least one document in preparation for your 3 deposition today? 4 A. Yes. 5 Q. Was it more than one or just one? 6 A. I can't remember. Maybe one. 7 Q. When did you look at it? 8 A. Maybe the other day when we talked, 9 yes. 10 Q. It had been sent to you to look at 11 in connection -- 12 A. Yes. 13 Q. You got it by email or mail or 14 something like that? 15 A. Yes. 16 Q. Did you at any other time look at 17 documents in preparation for this case? 18 A. No. 19 Q. Did you at any other time meet with 20 your lawyers or with other plaintiffs or anyone 21 else in preparation for your deposition in this 22 case? 23 A. No.</p>	<p style="text-align: right;">Page 20</p> <p>1 A. Voters League. The voters get 2 together and they meet about once a month and they 3 rotate churches. 4 So a guy named Ron Smith, one of the 5 Commissioners, ask me would I take a part in it. 6 Q. Mr. Smith is a Bullock county 7 Commissioner? 8 A. He was. 9 Q. He is not anymore? 10 A. I don't think so. 11 Q. At the time he was in 2021? 12 A. Yes. 13 Q. The Voters League -- tell me what 14 the Voters League is, please. 15 A. They go around and discuss problems 16 that's going on in Union Springs like the Sheriff's 17 Department, the Commission, Education, all of that. 18 They just meet and get together. 19 Q. And so you think that it was at a 20 Voters League meeting, I would guess in 2021, when 21 this lawsuit was filed that you were asked if you 22 wanted to be a plaintiff? 23 A. It wasn't at the meeting, but Ron</p>

<p style="text-align: right;">Page 21</p> <p>1 Smith called me and asked me would I be a plaintiff 2 in it. 3 Q. Do you recall anything about that 4 conversation; what he told you, what you might have 5 asked him? 6 A. I don't recall. 7 Q. Why did you decide to become a 8 plaintiff? 9 A. Because I'm interested in the 10 redistricting of Alabama. I just want a fair vote 11 for every citizen in the State of Alabama. 12 MR. WALKER: Off the record. 13 14 (WHEREUPON, an off-the-record 15 discussion was had, after which the following 16 occurred) 17 18 Q. (BY MR. WALKER) Back on the record. 19 So that kind of leads us to the next 20 question. What is your understanding of what this 21 case is about? 22 A. My understanding is that we want to 23 get at least two -- give blacks a fair chance to</p>	<p style="text-align: right;">Page 23</p> <p>1 Terry Sewell. 2 Do you understand that to be a fact? 3 A. Yes. 4 Q. Do you believe that that 5 situation -- seven districts, one of which is 6 majority black -- does not give a fair chance for, 7 I guess, the black population of Bullock County to 8 elect their candidate of choice? 9 A. Ask that again, please. 10 Q. Okay. Do you think that it's unfair 11 to have seven Congressional Districts of which one 12 is a majority black district? 13 A. I don't think it's fair. 14 Q. So that leads into the question I'm 15 really trying to get at is why do you think -- if 16 you can tell me -- why you think that might be 17 unfair? 18 A. Because they have all of the blacks 19 in one district, and they just can't -- they just 20 can elect one black representative to represent the 21 race here in Alabama. 22 Q. Other than that sort of general 23 description of your claim, can you be more</p>
<p style="text-align: right;">Page 22</p> <p>1 win at least two districts in Alabama. 2 Q. Two Congressional Districts? 3 A. Yes. 4 Q. And you used the phrase "a fair 5 chance." What does a fair chance mean as you 6 understand it? 7 A. A fair chance means giving me the 8 same chance that they would give you. Every 9 opportunity they would give you, give me the same 10 chance. 11 Q. When you say "you" pointing to me, 12 do you mean a white person -- is that what you mean 13 or -- 14 A. Yes. 15 Q. Okay. Do you consider the current 16 Congressional Districts -- not the current -- 17 scratch that, please. 18 Before 2021 -- well, after 2021 -- 19 the Legislature redrew the Congressional Districts 20 in 2021. And in that plan there were seven 21 Congressional Districts, which is what we are 22 allowed. And one of those was a majority black 23 district. CD-7 is represented by Congressperson</p>	<p style="text-align: right;">Page 24</p> <p>1 specific? 2 A. Yes. I think that in Birmingham 3 they got all of the blacks in -- just vote for one 4 candidate. The majority of the blacks only have a 5 chance to vote for one candidate. And then the 6 rest of them is all about white voters. That's 7 what I believe. 8 So we only get a chance to get just 9 one black in those seven, and I think that is 10 totally unfair. 11 Q. Okay. Do you -- this is a 12 complicated area of law. But do you have any 13 understanding or can you articulate for me what the 14 Constitution or the Voting Rights Act requires in 15 terms of creating districts in which blacks have an 16 equal opportunity to elect a candidate of choice? 17 The reason I'm asking you this 18 question is -- what I'm trying to do is find out 19 what your testimony will be at the trial. If you 20 don't know anything about this, and you are not 21 going to testify about it, that's fine. 22 I'm not -- I'm not trying to ask you 23 hard, academic questions just, you know, to</p>

<p style="text-align: right;">Page 25</p> <p>1 embarrass you.</p> <p>2 A. I'm not a professional about it.</p> <p>3 Q. If I were sitting in Birmingham in</p> <p>4 Federal Court and you were asked, "Reverend Walker,</p> <p>5 can you explain what you think is unfair about the</p> <p>6 Congressional plan that was enacted by the</p> <p>7 Legislature in 2023," could you -- would you tell</p> <p>8 me more than what you have already told me?</p> <p>9 A. I don't think so.</p> <p>10 Q. Okay. Do you know what sort of a</p> <p>11 remedy there -- there are three claims that are</p> <p>12 made in the Second Amended Complaint; two are</p> <p>13 brought under the Constitution, one is brought</p> <p>14 under Section Two of the Voting Rights Act.</p> <p>15 And they are all asking the court</p> <p>16 for relief saying that the plan that was enacted by</p> <p>17 the Legislature in 2023 either violates the</p> <p>18 Constitution or violates the Voting Rights Act.</p> <p>19 Assuming that the Singleton</p> <p>20 plaintiffs win on one of these claims, if not all</p> <p>21 three of them, what is it that you want the court</p> <p>22 to do?</p> <p>23 A. I want the court to give at least</p>	<p style="text-align: right;">Page 27</p> <p>1 A. I might have rushed when I answered</p> <p>2 that.</p> <p>3 Q. That's okay.</p> <p>4 Have you seen the Singleton Plan or</p> <p>5 the Smiththerman Plan or the court ordered plan?</p> <p>6 A. I might have seen it, but I don't</p> <p>7 recall what was in it just yet.</p> <p>8 Q. Do you know whether or not you have</p> <p>9 a preference among one of those plans or another?</p> <p>10 A. No.</p> <p>11 Q. Okay. So when it comes to naming</p> <p>12 the remedy, are you going to look to your lawyers</p> <p>13 to tell the court what is the best remedy?</p> <p>14 A. Yes.</p> <p>15 Q. And you won't provide any further</p> <p>16 testimony on that other than what you have already</p> <p>17 told me?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. That's fine.</p> <p>20 Would you mind, sir, if I ask your</p> <p>21 date of birth?</p> <p>22 A. March the 4th, 1955.</p> <p>23 Q. You've got me by about six months.</p>
<p style="text-align: right;">Page 26</p> <p>1 two chances for the blacks to gets in two of those</p> <p>2 districts. I believe two of those seven districts.</p> <p>3 I'm not just saying black -- I mean, Democrats or</p> <p>4 Republican, just give a fair chance to win.</p> <p>5 Q. I'm a little confused by the</p> <p>6 reference to Democrats and Republicans.</p> <p>7 A. I'm saying I think that the blacks</p> <p>8 should have equal opportunity to -- a fair chance</p> <p>9 to get at least two of those districts. That's</p> <p>10 what I mean.</p> <p>11 Q. And is that -- is that -- if I were</p> <p>12 to press you and ask you questions you would say</p> <p>13 "Dorman, that's the best statement I would want of</p> <p>14 what I could give you?"</p> <p>15 A. Yes.</p> <p>16 Q. And if I were to ask you what --</p> <p>17 what you meant by fair chance, you would say, as</p> <p>18 you did a few minutes ago, just what I have --</p> <p>19 A. Yes. Just an opportunity to win,</p> <p>20 yes.</p> <p>21 Q. Okay.</p> <p>22 A. I might have rushed that answer.</p> <p>23 Q. Sir?</p>	<p style="text-align: right;">Page 28</p> <p>1 And what is your residential</p> <p>2 address, please?</p> <p>3 A. 663 Hobbie Road, Montgomery,</p> <p>4 Alabama.</p> <p>5 Q. Is that one Y or I-E.</p> <p>6 A. H-O-B-B-I-E. Hobbie.</p> <p>7 Q. Is that your full-time residential</p> <p>8 address, Reverend?</p> <p>9 A. Yes.</p> <p>10 Q. Do you have any other property --</p> <p>11 any other residence?</p> <p>12 A. I own a house on 1456 Marlow Drive.</p> <p>13 Q. In Montgomery?</p> <p>14 A. Yes.</p> <p>15 Q. Nothing in Bullock County?</p> <p>16 A. Nothing in Bullock County.</p> <p>17 Q. Is your church in Bullock County?</p> <p>18 A. Yes, sir.</p> <p>19 Q. What is the name of your church?</p> <p>20 A. Walton Chapel Methodist Church.</p> <p>21 Q. And where is that located?</p> <p>22 A. 14405 Union Springs, Alabama.</p> <p>23 Aberfoil community.</p>

<p style="text-align: right;">Page 29</p> <p>1 Q. What's that last part?</p> <p>2 A. Aberfoil community.</p> <p>3 Q. Would you spell that.</p> <p>4 A. A-B-E-R-F-O-I-L.</p> <p>5 Q. What does that mean, Aberfoil?</p> <p>6 A. I don't have no idea. It's a</p> <p>7 community they live in, Aberfoil.</p> <p>8 Q. Fair enough.</p> <p>9 So you would be in Congressional</p> <p>10 District Two is where you live now --</p> <p>11 A. Yes.</p> <p>12 Q. -- under the current plan that the</p> <p>13 court ordered?</p> <p>14 A. Yes.</p> <p>15 Q. Have you ever posted anything on</p> <p>16 social media about this case or about redistricting</p> <p>17 or Voting Rights?</p> <p>18 A. No.</p> <p>19 Q. Do you post about church matters</p> <p>20 maybe on social media?</p> <p>21 A. Sometimes.</p> <p>22 Q. Do you post about any other topic?</p> <p>23 A. Sometimes.</p>	<p style="text-align: right;">Page 31</p> <p>1 Service, UPS, thirty-eight years.</p> <p>2 Q. When did you retire?</p> <p>3 A. January the 20th, 2017.</p> <p>4 Q. Congratulations.</p> <p>5 A. Thank you.</p> <p>6 Q. I'm going to do that at the end of</p> <p>7 the year.</p> <p>8 A. I also was a soldier in the United</p> <p>9 States Army for three years.</p> <p>10 Q. What was your MOS?</p> <p>11 A. For three years I was a truck</p> <p>12 driver, and twenty-five years with Alabama National</p> <p>13 Guard.</p> <p>14 Q. Also as a truck driver?</p> <p>15 A. No. Military police.</p> <p>16 Q. Military police. Okay.</p> <p>17 Have you ever held public office?</p> <p>18 A. No, sir.</p> <p>19 Q. Do you identify as a Democrat or</p> <p>20 Republican or as an Independent or something else?</p> <p>21 A. I haven't been -- put on a block</p> <p>22 identified as a Democrat or Republican, but I</p> <p>23 mostly vote Democrat.</p>
<p style="text-align: right;">Page 30</p> <p>1 Q. But nothing about redistricting --</p> <p>2 A. No, sir.</p> <p>3 Q. -- or nothing about this case?</p> <p>4 A. No.</p> <p>5 Q. Okay. I think we've probably</p> <p>6 covered this with the deposition. Clearly you have</p> <p>7 been involved in at least one other lawsuit, the</p> <p>8 lawsuit --</p> <p>9 A. Yes.</p> <p>10 Q. -- about your car accident.</p> <p>11 Have you been involved in any other</p> <p>12 lawsuits, sir --</p> <p>13 A. No, sir.</p> <p>14 Q. -- that you can recall?</p> <p>15 Other than your job as a pastor --</p> <p>16 which I guess is probably more of a calling than</p> <p>17 employment -- do you have any employment?</p> <p>18 A. No, sir.</p> <p>19 Q. Are you retired?</p> <p>20 A. Yes.</p> <p>21 Q. Can you tell them what you retired</p> <p>22 from.</p> <p>23 A. I retired from United Parcel</p>	<p style="text-align: right;">Page 32</p> <p>1 Q. Do you remember ever voting for a</p> <p>2 Republican candidate?</p> <p>3 A. Not -- not recently, no.</p> <p>4 Q. Okay. So is it fair to say that in</p> <p>5 the last ten years if you voted in a partisan</p> <p>6 election it has been for the Democratic candidate?</p> <p>7 A. Yes.</p> <p>8 Q. Do you have an opinion as to whether</p> <p>9 the black community, as you know it, tends to vote</p> <p>10 Republican or Democrat?</p> <p>11 A. Yes.</p> <p>12 Q. What is that opinion?</p> <p>13 A. I think -- my opinion is that we</p> <p>14 vote Democrat because the Democrats usually go for</p> <p>15 a black causes the most. And I think we don't vote</p> <p>16 Democrat or Republican, we just vote Democrat</p> <p>17 because they take care of us, even though we've got</p> <p>18 some of the same conservative ideas as some of them</p> <p>19 in the Republican Party. But we lean more to</p> <p>20 Democrat because they represent the black communi</p> <p>21 most.</p> <p>22 Q. How does the Democrat party</p> <p>23 represent the black community better than the</p>

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<p style="text-align: right;">Page 33</p> <p>1 Republican party?</p> <p>2 A. It looks like the Democrats take</p> <p>3 care of most of the black causes. And most of the</p> <p>4 time the Democrat be going towards -- I think the</p> <p>5 needs of the black community are met more by the</p> <p>6 Democrat party than the Republican.</p> <p>7 Q. Fair enough.</p> <p>8 What are the needs that you're</p> <p>9 referring?</p> <p>10 A. Getting these guns out of the</p> <p>11 street, fair housing, food deserts, hospital</p> <p>12 insurance, high interest rate on our credit cards,</p> <p>13 access to banks, fair housing.</p> <p>14 Q. Fair enough. Thank you.</p> <p>15 Have you ever participated -- let me</p> <p>16 start over.</p> <p>17 Until you became a plaintiff in this</p> <p>18 lawsuit, had you ever participated in any</p> <p>19 redistricting activity?</p> <p>20 A. No, sir.</p> <p>21 Q. Did you attend any of the hearings</p> <p>22 that were conducted by the redistricting -- by the</p> <p>23 Legislature's Reapportionment Committee before the</p>	<p style="text-align: right;">Page 35</p> <p>1 you are asked to testify about these at the trial,</p> <p>2 we would object to that because we couldn't depose</p> <p>3 you about it now.</p> <p>4 A. Okay.</p> <p>5 Q. Is that fair enough?</p> <p>6 So have you been asked or do you</p> <p>7 plan to testify about the Singleton Plan or the</p> <p>8 Smitherman Plan?</p> <p>9 A. Ask the question again.</p> <p>10 Q. Okay. Do you know anything, other</p> <p>11 than vague generalities, about the Smitherman Plan</p> <p>12 or the Singleton Plan?</p> <p>13 A. Only a little bit about them, yes.</p> <p>14 Q. What do you know about them?</p> <p>15 A. That we need to keep the Voting</p> <p>16 Rights Act in and we need two equal opportunity</p> <p>17 districts. That's what I know.</p> <p>18 Q. Do you know anything else about --</p> <p>19 if you were on the stand in Federal Court could you</p> <p>20 tell me anything else about the Singleton Plan or</p> <p>21 the Smitherman Plan?</p> <p>22 A. No.</p> <p>23 Q. The same about the 2021</p>
<p style="text-align: right;">Page 34</p> <p>1 2021 special session on redistricting?</p> <p>2 A. No.</p> <p>3 Q. Since you have become a plaintiff in</p> <p>4 this lawsuit have you participated in any other</p> <p>5 redistricting activity, other than being a</p> <p>6 plaintiff in the lawsuit?</p> <p>7 A. No.</p> <p>8 Q. Okay. Have you made any public</p> <p>9 statements about Congressional redistricting or</p> <p>10 redistricting or voting rights in the last five or</p> <p>11 six years?</p> <p>12 A. No.</p> <p>13 Q. I think we can cut this deposition</p> <p>14 short.</p> <p>15 I'm going to ask you some questions</p> <p>16 about whether you plan or know if you know anything</p> <p>17 about some topics that you might testify about at</p> <p>18 the trial.</p> <p>19 And if you don't know anything about</p> <p>20 them or don't have any plans to testify about</p> <p>21 those, we will move on.</p> <p>22 A. Okay.</p> <p>23 Q. If we do that, and then subsequently</p>	<p style="text-align: right;">Page 36</p> <p>1 redistricting plan passed by the Legislature. Do</p> <p>2 you know anything about it?</p> <p>3 A. Yes. I know that it passed.</p> <p>4 Q. Other than that, do you know</p> <p>5 anything?</p> <p>6 A. No.</p> <p>7 Q. What about the 2023 Congressional</p> <p>8 redistricting plan passed by the Legislature --</p> <p>9 A. No.</p> <p>10 Q. -- do you know anything about it?</p> <p>11 A. No.</p> <p>12 Q. What about the 2023 court ordered</p> <p>13 plan; do you know anything about it?</p> <p>14 A. Very little.</p> <p>15 Q. Tell me -- just tell me what you</p> <p>16 know.</p> <p>17 A. That the court ordered them to</p> <p>18 redraw the map.</p> <p>19 Q. Do you know how the map was redrawn</p> <p>20 in any way?</p> <p>21 A. No.</p> <p>22 Q. Anything else you can tell me about</p> <p>23 the court ordered plan?</p>

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<p style="text-align: right;">Page 37</p> <p>1 A. No.</p> <p>2 Q. Are you going to testify about how</p> <p>3 any particular plan complies with the Constitution</p> <p>4 and the Voting Rights Act?</p> <p>5 A. No.</p> <p>6 Q. Are you going to testify about or do</p> <p>7 you have any evidence about the intent of the</p> <p>8 Legislature when it passed the 2023 Congressional</p> <p>9 Plan?</p> <p>10 A. Ask the question again, please,</p> <p>11 because you are asking me dates that I don't</p> <p>12 really --</p> <p>13 Q. That's fine.</p> <p>14 A. I can't put them together, so I</p> <p>15 really don't know.</p> <p>16 Q. In 2023 the Legislature passed a</p> <p>17 Congressional redistricting plan.</p> <p>18 A. Okay.</p> <p>19 Q. Do you have any evidence that when</p> <p>20 the Legislature passed that plan it intended to</p> <p>21 discriminate against black persons on the basis of</p> <p>22 race?</p> <p>23 A. Not any evidence.</p>	<p style="text-align: right;">Page 39</p> <p>1 Q. I get you.</p> <p>2 What would -- I will tell you later.</p> <p>3 What would be an example of some</p> <p>4 laws that were passed to keep blacks out of</p> <p>5 politics?</p> <p>6 MR. PENN: Object to the form. You</p> <p>7 can go ahead and answer.</p> <p>8 You can go ahead and answer.</p> <p>9 A. Ask the question again, please.</p> <p>10 Q. You said, as I recall your testimony</p> <p>11 in response to my last question, that you thought</p> <p>12 that a lot of laws were passed -- or maybe you said</p> <p>13 intended, I'm not sure exactly what you said -- to</p> <p>14 keep blacks out of politics.</p> <p>15 Do you recall that testimony?</p> <p>16 A. Yes.</p> <p>17 Q. Okay.</p> <p>18 A. I think that the Voters Right Act --</p> <p>19 we want to keep that in place so more black can</p> <p>20 come into politics. Voter IDs and drive by voting</p> <p>21 and absentee ballots -- I think those are laws that</p> <p>22 really hurt.</p> <p>23 Q. So you said voting ID -- and that's</p>
<p style="text-align: right;">Page 38</p> <p>1 Q. Okay. Do you have a belief that</p> <p>2 when the Legislature passed that plan it intended</p> <p>3 to discriminate against black persons on the basis</p> <p>4 of race?</p> <p>5 A. Yes.</p> <p>6 Q. And what is the basis of that</p> <p>7 belief?</p> <p>8 A. Because -- what's the basis of that</p> <p>9 belief?</p> <p>10 Q. Yes, sir.</p> <p>11 A. Because ever since I can remember it</p> <p>12 looked like we are more concerned about race than</p> <p>13 fair politics; more concerned about race than the</p> <p>14 parties lines. So that's what I do believe.</p> <p>15 Q. When you saw more concerned about</p> <p>16 race, can you be more specific?</p> <p>17 Can you give me some examples of</p> <p>18 what you mean.</p> <p>19 A. I think that a lot of these laws are</p> <p>20 made to keep blacks out of politics or against the</p> <p>21 black community. That's what I really think. I</p> <p>22 have been in Alabama for sixty-nine years, so I sa</p> <p>23 a lot of that.</p>	<p style="text-align: right;">Page 40</p> <p>1 the law that requires you have an ID in order to</p> <p>2 vote?</p> <p>3 A. Yes. Some of them, yes.</p> <p>4 Q. And is that what you were referring</p> <p>5 to?</p> <p>6 A. Yes.</p> <p>7 Q. And do you know anybody who has not</p> <p>8 been able to vote because they don't have an ID?</p> <p>9 A. Not right offhand, but --</p> <p>10 Q. You mentioned, I think, absentee</p> <p>11 ballots.</p> <p>12 A. Yes.</p> <p>13 Q. And what is your concern there?</p> <p>14 A. I believe that if I'm out of town I</p> <p>15 should be able to get a ballot and vote and mail it</p> <p>16 in.</p> <p>17 Q. Do you know if you can do that now?</p> <p>18 A. Yes, I think you can. But I heard</p> <p>19 about a lot of laws trying to stop that.</p> <p>20 Q. Do you know if those laws were</p> <p>21 enacted or not?</p> <p>22 A. No.</p> <p>23 Q. You don't know or they were not</p>

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<p style="text-align: right;">Page 41</p> <p>1 enacted?</p> <p>2 A. I don't know.</p> <p>3 Q. And what -- I'm sorry. What were</p> <p>4 your other two concerns you mentioned?</p> <p>5 A. I forgot.</p> <p>6 Q. What do you mean by drive by voting?</p> <p>7 I'm not sure I understand that.</p> <p>8 A. I mean, there are some folks that</p> <p>9 are handicapped, and we should have every</p> <p>10 opportunity we can as long as we are a citizen of</p> <p>11 the state to vote. That's what I mean. Every</p> <p>12 opportunity possible.</p> <p>13 Q. Fleshing that out. Would you mean</p> <p>14 to say that certain disabled people ought to be</p> <p>15 able to vote in their car without having to come</p> <p>16 in?</p> <p>17 A. Yes.</p> <p>18 Q. And do you understand that -- okay.</p> <p>19 That's fine.</p> <p>20 Anything else?</p> <p>21 A. No.</p> <p>22 Q. Okay. Do you know if proposals have</p> <p>23 been made to allow that in Alabama?</p>	<p style="text-align: right;">Page 43</p> <p>1 A. I don't know about it.</p> <p>2 Q. Other than what you have told me, do</p> <p>3 you -- do you have any evidence or believe that --</p> <p>4 scratch that.</p> <p>5 MR. WALKER: Let me take a little</p> <p>6 break.</p> <p>7</p> <p>8 1:36 PM</p> <p>9 (SHORT RECESS)</p> <p>10 1:43 PM</p> <p>11</p> <p>12 Q. (BY MR. WALKER) We are back on the</p> <p>13 record.</p> <p>14 When we were talking a few minutes</p> <p>15 ago, if I understood your testimony correctly, you</p> <p>16 said that -- I'm paraphrasing, so correct me if I</p> <p>17 misstate you -- the black voters that you knew --</p> <p>18 the black people that you knew typically find that</p> <p>19 the Democratic party represents their issues best.</p> <p>20 And we talked about those issues</p> <p>21 such as Fair Housing and credit card interest rates</p> <p>22 and that sort of stuff. But I believe you said</p> <p>23 that -- although there were some Republican issues</p>
<p style="text-align: right;">Page 42</p> <p>1 A. I think so. I'm not sure.</p> <p>2 Q. All right. That's fair enough.</p> <p>3 Are you going to provide -- or do</p> <p>4 you intend to provide any testimony about what</p> <p>5 various Supreme Court decisions such as what Cooper</p> <p>6 v. Harris mean?</p> <p>7 A. No.</p> <p>8 Q. Are you going to testify or do you</p> <p>9 plan to testify or know anything about whether or</p> <p>10 not the State of Alabama is required to draw</p> <p>11 influence districts or crossover districts in order</p> <p>12 to comply with the Constitution or the Voting</p> <p>13 Rights Act?</p> <p>14 A. I don't know.</p> <p>15 Q. You don't know anything about that?</p> <p>16 A. No. I don't know enough to talk</p> <p>17 about it.</p> <p>18 Q. So you are not going to testify</p> <p>19 about that?</p> <p>20 A. No.</p> <p>21 Q. Okay. Do you plan to offer any</p> <p>22 testimony in support of the Caster or Milligan</p> <p>23 plans?</p>	<p style="text-align: right;">Page 44</p> <p>1 that you agree with, too.</p> <p>2 Did I understand you correctly?</p> <p>3 MR. PENN: Object to the form.</p> <p>4 A. Yeah. I think a lot of blacks are</p> <p>5 just as conservative at some of the Republicans.</p> <p>6 Q. Explain that to me, please.</p> <p>7 A. Lord Jesus. Abortion issues.</p> <p>8 Q. Abortion?</p> <p>9 A. Yes.</p> <p>10 Q. What else?</p> <p>11 A. LGBT issues --</p> <p>12 Q. Okay.</p> <p>13 A. -- and stuff like that.</p> <p>14 Q. Okay. Physical issues, for example,</p> <p>15 physical policies, taxes, the size of the national</p> <p>16 debt?</p> <p>17 A. Yes.</p> <p>18 Q. Defense spending?</p> <p>19 A. Yes.</p> <p>20 Q. Which ones?</p> <p>21 A. Maybe the size of the national debt.</p> <p>22 Q. Okay.</p> <p>23 A. I don't think we understand defense</p>

<p style="text-align: right;">Page 45</p> <p>1 spending.</p> <p>2 Q. Any other particularly -- any other</p> <p>3 issues that the Republican party takes the lead on</p> <p>4 that you think black people tend to identify with?</p> <p>5 A. And then I think black people are</p> <p>6 more Christian -- black folks are Christians. We</p> <p>7 believe in being a Christian. Not fake, but the</p> <p>8 real thing when it comes down to being a follower</p> <p>9 of Jesus Christ. Not just a Christian, but a</p> <p>10 follower of Jesus Christ; we are interested in</p> <p>11 that.</p> <p>12 Q. Do you see that is something that is</p> <p>13 particularly Republican or Democratic?</p> <p>14 A. To be honest, I think a lot of</p> <p>15 Republicans play with the word Christian. They</p> <p>16 want Christian values. But I don't see a lot of</p> <p>17 follow-through with it.</p> <p>18 Q. You talked earlier about wanting two</p> <p>19 districts in which black voters have an opportunity</p> <p>20 to elect their candidate of choice.</p> <p>21 Do you recall generally discussing</p> <p>22 that with me?</p> <p>23 A. Yes.</p>	<p style="text-align: right;">Page 47</p> <p>1 the facts of this case of black influence or black</p> <p>2 majority districts?</p> <p>3 MR. PENN: Object to the form.</p> <p>4 A. I don't know any case law.</p> <p>5 Q. Okay. Did you just say -- I'm</p> <p>6 having difficulty with my notes today -- that you</p> <p>7 thought that a lot of Republicans voted on the</p> <p>8 basis of race?</p> <p>9 A. Yes.</p> <p>10 Q. Could you explain that to me,</p> <p>11 please, sir.</p> <p>12 A. Well, voters -- there is gun</p> <p>13 violence. I think they vote on race.</p> <p>14 Q. And can you be a little bit more</p> <p>15 specific, if you can.</p> <p>16 A. I believe they know these gun laws</p> <p>17 are bad. Gun laws are bad.</p> <p>18 Q. Gun laws -- which gun laws are you</p> <p>19 referring to?</p> <p>20 A. Anybody in Alabama can get a gun if</p> <p>21 they want one. They know they are bad but they</p> <p>22 stick together. And they know who they hurt the</p> <p>23 most.</p>
<p style="text-align: right;">Page 46</p> <p>1 Q. Why two?</p> <p>2 Why not one or two or three or four?</p> <p>3 How do you come up with two?</p> <p>4 A. I believe that the -- the white</p> <p>5 politicians usually vote together on things. They</p> <p>6 vote race instead of party. So we need every</p> <p>7 chance we get to have somebody in there to</p> <p>8 represent us.</p> <p>9 Q. I want to ask you about that. But</p> <p>10 why two districts as opposed to three districts in</p> <p>11 which --</p> <p>12 A. I think we need more than two, but</p> <p>13 we need two opportunities -- at least two.</p> <p>14 Q. At least two?</p> <p>15 A. Yes.</p> <p>16 Q. Do you know of any rule or guidance</p> <p>17 that would tell us what is the correct, if you</p> <p>18 will, number of majority black or black influenced</p> <p>19 districts?</p> <p>20 A. Ask that question again, please.</p> <p>21 Q. Let me rephrase the question.</p> <p>22 Do you know what rule of law or case</p> <p>23 law would tell us what is the correct number under</p>	<p style="text-align: right;">Page 48</p> <p>1 Q. Who does it hurt the most?</p> <p>2 A. The black folks.</p> <p>3 Q. Okay. Are you really saying that</p> <p>4 you think that they passed these laws because they</p> <p>5 think it will hurt black people?</p> <p>6 A. I think they stick together more and</p> <p>7 pass these laws. Because the last law -- I don't</p> <p>8 want to get into a long conversation -- that the</p> <p>9 Sheriff and FBI asked the Legislature downtown to</p> <p>10 not let these guns come into the community, but</p> <p>11 they passed the law anyway.</p> <p>12 Q. That would be the permitless carry</p> <p>13 law?</p> <p>14 A. Everything concerning guns, yes.</p> <p>15 Anybody can have one.</p> <p>16 Q. So would your position be that they</p> <p>17 passed these laws because they want to injure black</p> <p>18 people or did they pass these because they are</p> <p>19 indifferent to the interests of black people?</p> <p>20 A. I think they are indifferent to the</p> <p>21 interest of black people, and they passed the law</p> <p>22 as a group because they are influenced by different</p> <p>23 organizations that blacks don't have access to.</p>

<p style="text-align: right;">Page 49</p> <p>1 Q. Okay.</p> <p>2 A. Am I talking too fast?</p> <p>3 Q. No, sir.</p> <p>4 A. Okay.</p> <p>5 Q. Well, you're not for me. The court</p> <p>6 reporter will tell you if you get too fast.</p> <p>7 A. Okay.</p> <p>8 Q. Are there other laws that you think</p> <p>9 the Legislature passes where -- I guess it's sort</p> <p>10 of a -- they vote together with indifference to the</p> <p>11 consequences for the black community?</p> <p>12 A. There are others, but I can't think</p> <p>13 of them at this particular time.</p> <p>14 Q. Okay. Thank you.</p> <p>15 When you -- earlier we were talking</p> <p>16 about areas where you thought that the black</p> <p>17 community agreed with the Republican Party and you</p> <p>18 mentioned abortion.</p> <p>19 A. Uh-huh (Nodding head).</p> <p>20 Q. I just want to nail that down.</p> <p>21 What do you think is the position of</p> <p>22 the Republican Party that black people agree with</p> <p>23 with regard to abortion?</p>	<p style="text-align: right;">Page 51</p> <p>1 plaintiff in this lawsuit to allow for the creation</p> <p>2 of two seats that are likely to send Democrats to</p> <p>3 Congress?</p> <p>4 A. Ask the question again, please.</p> <p>5 Q. Do you want the plan that would be</p> <p>6 drawn if you prevail in your lawsuit to be one that</p> <p>7 sends two Democrats as opposed to just one Democrat</p> <p>8 to Congress?</p> <p>9 MR. PENN: Object to the form.</p> <p>10 Q. Are you focusing on the party is</p> <p>11 what I'm asking you.</p> <p>12 A. No.</p> <p>13 Q. Okay. I'm not looking at my phone.</p> <p>14 I have got some questions for you here.</p> <p>15 You mentioned that a person should</p> <p>16 have every opportunity to vote if they -- when we</p> <p>17 were talking about voter ID, a person should have</p> <p>18 every opportunity to vote if they are a citizen of</p> <p>19 the State.</p> <p>20 A. Yes.</p> <p>21 Q. I certainly agree with you on that.</p> <p>22 Do you have an opinion as to how the</p> <p>23 State should verify whether or not a person is a</p>
<p style="text-align: right;">Page 50</p> <p>1 A. I think black people agree that if</p> <p>2 it's necessary -- medically necessary they believe</p> <p>3 in abortion.</p> <p>4 Q. But --</p> <p>5 A. But not, they don't believe in it.</p> <p>6 Q. If it's not medically necessary?</p> <p>7 A. Yes.</p> <p>8 Q. So no abortion unless medical</p> <p>9 necessity?</p> <p>10 A. Yes.</p> <p>11 Q. And you also mentioned LGBT. What</p> <p>12 is your understanding of the position of the</p> <p>13 Republican Party on the LGBT issues that black</p> <p>14 people agree with?</p> <p>15 A. That it destroys families. That it</p> <p>16 destroys family members.</p> <p>17 Q. LGBT activities destroy family</p> <p>18 values?</p> <p>19 A. Yes. That's my belief.</p> <p>20 Q. I understand.</p> <p>21 Give me just a second, please, sir.</p> <p>22 (Pause)</p> <p>23 Q. Is one of your goals in being a</p>	<p style="text-align: right;">Page 52</p> <p>1 citizen of the State when they come to vote if not</p> <p>2 with an ID?</p> <p>3 A. Yes.</p> <p>4 Q. What would that be, sir?</p> <p>5 A. I think they should have an ID or</p> <p>6 something to recognize them.</p> <p>7 Q. In a case called Caster there is --</p> <p>8 there is a plaintiff named Ronald Smith. Do you</p> <p>9 know if that's the same Ron Smith who talked to you</p> <p>10 about becoming a plaintiff in this lawsuit?</p> <p>11 A. I don't know.</p> <p>12 Q. Let me read you what the Caster</p> <p>13 complaint says about Mr. Smith and see if -- tell</p> <p>14 me if that fits the description, please.</p> <p>15 A. Yes.</p> <p>16 Q. This is paragraph seven of the</p> <p>17 Caster -- the operative Caster complaint.</p> <p>18 "Plaintiff Ronald Smith is a black citizen of the</p> <p>19 United States and of the State of Alabama, a</p> <p>20 registered voter, and a resident of Bullock County</p> <p>21 who under the 2023 plan resides in Congressional</p> <p>22 District Two."</p> <p>23 "Congressional District Two is a</p>

<p style="text-align: right;">Page 53</p> <p>1 majority white district in which black voters like 2 Mr. Smith do not have an opportunity to elect their 3 preferred candidates. An additional majority black 4 district would be drawn incorporating all or some 5 of Bullock County including Mr. Smith's residence." 6 That's the complete paragraph. And 7 I guess the part that is relevant is that this 8 Ronald Smith is a registered voter and resident of 9 Bullock County was the Ron Smith that asked you to 10 become a plaintiff in this lawsuit a resident of 11 Bullock County? 12 A. I think so. 13 Q. So it could be the same person, you 14 just don't know? 15 A. Yes, it could be. 16 Q. Thank you. 17 When did you register to vote, 18 Reverend Walker? 19 A. Probably '55, '65, '75. I don't 20 know. As soon as I got an opportunity maybe at 21 eighteen. 22 Q. Back when you turned eighteen? 23 A. Yes.</p>	<p style="text-align: right;">Page 55</p> <p>1 Q. Do you know where you're supposed to 2 vote in Montgomery County? 3 A. Yes. 4 Q. Have you ever had any difficulty 5 knowing where you were supposed to vote? 6 A. No. 7 Q. So you usually get some sort of a 8 postcard from the judge of probate before each 9 election telling you where to vote -- 10 A. Yes. 11 Q. Wait till I finish, please. 12 Are we okay? 13 So you were born, just as I said, a 14 few months ahead of me. I'm December of '55. And 15 I think you would agree with me that the world has 16 changed a lot since then. 17 A. Oh, yeah. 18 Q. What were the ways that -- as you 19 were growing up you felt you were discriminated 20 against on the basis of your race? 21 A. Oh, man. I was born in Choctaw 22 County on the Alabama/Mississippi line in 1955. In 23 1971 we didn't have a black nothing -- police</p>
<p style="text-align: right;">Page 54</p> <p>1 Q. You would have gone, I guess, to the 2 court house? 3 A. Yes. 4 Q. Did you grow up in Bullock County? 5 A. No. I grew up in Choctaw County. 6 Q. Oh, Choctaw. 7 Whereabouts? 8 A. What do you mean whereabouts? 9 Q. In Choctaw County. 10 A. A place called Butler. 11 Q. What is the capital city of Choctaw? 12 A. Butler. 13 Q. So you would have gone to the county 14 seat in Butler -- at the county courthouse, I mean, 15 and registered to vote? 16 A. Yes. 17 Q. Did you have any trouble registering 18 to vote at that time? 19 A. I can't remember. 20 Q. All right. Do you know of anybody 21 who has had difficulty registering to vote in the 22 last ten years? 23 A. No.</p>	<p style="text-align: right;">Page 56</p> <p>1 officer, sheriff, grocery store clerk. 2 Nobody did anything -- no 3 professional jobs. Only logged wood and log truck 4 and being a maid. 5 I went to -- I was born in a town 6 when integration and segregation kind of changed 7 over. I was born in a situation where we got the 8 lowest kind of books other folks send down, the 9 school buses, and the worst teachers. So I know 10 exactly what discrimination is about. 11 Q. When did the Choctaw County school 12 system -- was it a County system or Butler City? 13 A. County system. 14 Q. When did it integrate in any 15 meaningful way? 16 A. Probably from '69, '70, '71, '72. 17 Q. Was it -- how was that integration 18 effective? 19 A. Sir? 20 Q. Was the integration accomplished by 21 closing schools or busing students or changing 22 attendance on zones -- 23 A. Probably busing.</p>

<p style="text-align: right;">Page 57</p> <p>1 Q. Busing.</p> <p>2 Were you bussed?</p> <p>3 A. Yes.</p> <p>4 Q. Tell me about that.</p> <p>5 A. I went to a little school called</p> <p>6 Listerman Training School and I was bussed from my</p> <p>7 house to Butler. That's how the they integrated</p> <p>8 it.</p> <p>9 Q. How far was that bus rides?</p> <p>10 A. Maybe fifteen miles.</p> <p>11 Q. Fifteen did you say?</p> <p>12 A. Yes.</p> <p>13 Q. What's the name of the training</p> <p>14 school?</p> <p>15 A. Choctaw County Training School.</p> <p>16 That's where the blacks went.</p> <p>17 Q. Okay. So Bullock County up until at</p> <p>18 least 1971 had no -- no employment opportunities</p> <p>19 except for the lowest for black people; would that</p> <p>20 be a fair summary?</p> <p>21 A. In Choctaw County, yes.</p> <p>22 Q. In Choctaw County. I said Bullock</p> <p>23 County. I meant Choctaw County.</p>	<p style="text-align: right;">Page 59</p> <p>1 Q. I don't doubt that.</p> <p>2 A. Born in it, yes.</p> <p>3 Q. How have things changed or even</p> <p>4 improved since then?</p> <p>5 A. I guess the better education we got</p> <p>6 the more blacks got into the system. They would be</p> <p>7 able to send it down to other folks that helped us</p> <p>8 out. If one went up the ladder, they showed the</p> <p>9 others how to get there.</p> <p>10 Q. Do you -- did you growing up in</p> <p>11 Bullock --</p> <p>12 A. Choctaw County.</p> <p>13 Q. Choctaw County. Thank you so much.</p> <p>14 I apologize. In my head I was saying Choctaw.</p> <p>15 Did you experience discrimination</p> <p>16 when you went shopping, for example?</p> <p>17 A. Yes.</p> <p>18 Q. Do you experience that sort of</p> <p>19 discrimination now?</p> <p>20 A. No.</p> <p>21 Q. Did you or your family experience</p> <p>22 discrimination in housing when you were growing up?</p> <p>23 A. Yes.</p>
<p style="text-align: right;">Page 58</p> <p>1 A. Yes.</p> <p>2 Q. I apologize.</p> <p>3 What other ways did you feel that</p> <p>4 you might have between discriminated or were</p> <p>5 discriminated against?</p> <p>6 A. You're talking about back in Choctaw</p> <p>7 County or now?</p> <p>8 Military.</p> <p>9 Q. Military?</p> <p>10 A. Yes.</p> <p>11 Q. How is that, sir?</p> <p>12 A. Army National Guard was strictly --</p> <p>13 discriminated against blacks up in the -- I was in</p> <p>14 a unit up in Prattville. They had the good ole boy</p> <p>15 system.</p> <p>16 Blacks came in that was educated,</p> <p>17 they had prior service, but they couldn't get rank</p> <p>18 passed because of the color of our skin. That's</p> <p>19 the only reason.</p> <p>20 Q. I understand.</p> <p>21 A. Run better, run faster, shoot</p> <p>22 better, do everything. I'm well aware of</p> <p>23 discrimination.</p>	<p style="text-align: right;">Page 60</p> <p>1 Q. Do you experience that</p> <p>2 discrimination now?</p> <p>3 A. Not me.</p> <p>4 Q. Okay. Do you know of people who</p> <p>5 have experienced discrimination on the basis of</p> <p>6 race in housing in the current period -- let's say</p> <p>7 within the last five or ten years?</p> <p>8 A. I think I do, but I don't know</p> <p>9 whether or not they know they do.</p> <p>10 Q. Explain your answer to me, please,</p> <p>11 sir.</p> <p>12 A. I mean, down in Bullock County</p> <p>13 they've got a lot of folks living in those run-down</p> <p>14 trailers. And I don't know whether they are</p> <p>15 getting the HUD money to take care of them or not.</p> <p>16 But they are in run-down trailers.</p> <p>17 I went to one neighborhood and they</p> <p>18 had cats and bosses in the community. And some g</p> <p>19 down there is getting a lot of rent off those folks</p> <p>20 for the horrible condition they are living in. I</p> <p>21 think that's strictly discrimination.</p> <p>22 And I believe down there --</p> <p>23 Q. Hang on a just one second.</p>

<p style="text-align: right;">Page 61</p> <p>1 (Pause)</p> <p>2 Q. All right.</p> <p>3 A. I think -- as far as fair housing --</p> <p>4 I think there's still a lot of discriminatory in</p> <p>5 Bullock County and Choctaw County.</p> <p>6 Q. When you say discriminatory, you</p> <p>7 mean that black people are living in trailers that</p> <p>8 are run down and inadequate?</p> <p>9 A. Yes.</p> <p>10 Q. Okay. And if -- in what way is that</p> <p>11 discriminatory as opposed to just an unfortunate</p> <p>12 circumstances of their economics?</p> <p>13 A. I don't think they have a chance to</p> <p>14 educate themselves enough or opportunity to teach</p> <p>15 them it's better to have a house than a trailer.</p> <p>16 And you got the young girls down</p> <p>17 there -- they living in those conditions. And I</p> <p>18 think peoples who own those trailers get a good</p> <p>19 chunk of money from the Government. That's what I</p> <p>20 believe. So I think it is discriminatory.</p> <p>21 Q. Do you believe that discrimination</p> <p>22 in education is less now than it was when you were</p> <p>23 growing up?</p>	<p style="text-align: right;">Page 63</p> <p>1 Q. It's better than when you were</p> <p>2 growing up?</p> <p>3 A. Yes.</p> <p>4 Q. Do you believe that there are</p> <p>5 problems that persist?</p> <p>6 A. Yes.</p> <p>7 Q. What are those?</p> <p>8 A. I don't think a lot of blacks can</p> <p>9 afford the kind of healthcare they really need.</p> <p>10 Q. In other words, would it be fair to</p> <p>11 say that you are referring to our lack of a</p> <p>12 National Healthcare System?</p> <p>13 A. Yes.</p> <p>14 Q. I asked you about registering to</p> <p>15 vote and going to vote, but not voting itself.</p> <p>16 Have you had, yourself, any</p> <p>17 difficulty in actually voting when you have gone to</p> <p>18 vote in, let's say, the last ten years?</p> <p>19 A. No.</p> <p>20 Q. Do you know of anyone who has had</p> <p>21 other than -- you sort of alluded to disabled</p> <p>22 people who might have difficulty actually getting</p> <p>23 into a polling place.</p>
<p style="text-align: right;">Page 62</p> <p>1 A. I think it's better now.</p> <p>2 Q. The education system is?</p> <p>3 A. It's better.</p> <p>4 Q. More fair to black people?</p> <p>5 A. Yes.</p> <p>6 Q. Do you believe that black people now</p> <p>7 as opposed to previously have a more equal -- if</p> <p>8 that's a phrase -- have a better opportunity to</p> <p>9 enter the professions --</p> <p>10 A. Yes.</p> <p>11 Q. -- and have jobs other than just at</p> <p>12 the bottom?</p> <p>13 A. Yes.</p> <p>14 Q. Okay. Do you have any opinion as to</p> <p>15 whether black people these days have equal or</p> <p>16 fair -- whatever the word is you want to use --</p> <p>17 access to healthcare?</p> <p>18 A. Some of us, yes.</p> <p>19 Q. As compared to when you were growing</p> <p>20 up?</p> <p>21 A. Yes.</p> <p>22 Q. Yes?</p> <p>23 A. Yes.</p>	<p style="text-align: right;">Page 64</p> <p>1 Aside from that, do you know of</p> <p>2 anyone who has had difficulty because of their race</p> <p>3 voting within the last ten years?</p> <p>4 A. No.</p> <p>5 MR. WALKER: Reverend Walker, I</p> <p>6 believe that is all that I have for you.</p> <p>7 It may be that some of the other</p> <p>8 attorneys who are participating remotely or Mr.</p> <p>9 Penn may have questions for you.</p> <p>10 If they do I might have some further</p> <p>11 questions for you. Right now I'm done.</p> <p>12 MR. PENN: I don't have any</p> <p>13 questions.</p> <p>14 MR. WALKER: Does anyone who is</p> <p>15 participating remotely have any questions for</p> <p>16 Reverend Walker?</p> <p>17 MS. MESSICK: Good afternoon.</p> <p>18 No questions from the Secretary of</p> <p>19 State.</p> <p>20 MR. WALKER: Anyone else?</p> <p>21 Reverend Walker, thank you so much</p> <p>22 for coming in today. I have enjoyed talking to</p> <p>23 you.</p>

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1 THE WITNESS: God bless you.
 2 MR. WALKER: This deposition is
 3 over.

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 8 (Deposition concluded at 2:08 PM)
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1 C E R T I F I C A T E

2 I hereby certify that the above and
 3 foregoing deposition of REVEREND ANDREW WALKER was
 4 taken down by me in stenotype and the questions and
 5 answers thereto were transcribed by means of
 6 computer-aided transcription given by said witness
 7 upon said deposition.

8 I further certify that I am neither of
 9 counsel, nor of kin to the parties to the action,
 10 nor am I in anywise interested in the result of
 11 said cause.

12 I further certify that I am duly licensed
 13 by the Alabama, Georgia, and Tennessee Boards of
 14 Court Reporting as a Certified Court Reporter as
 15 evidenced by the numbers following my name found
 16 below.

17
 18 DAVID L. MILLER, CCR, RPR, RMR
 19

20 Alabama #347; expires 9/30/2024
 21 Georgia #6322-0018-0740-915; expires 4/1/2025
 22 Commissioner for the State of Alabama at Large.
 23 My Commission Expires 1/10/2026

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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ALABAMA
SOUTHERN DIVISION

BOBBY SINGLETON, et al.,

Plaintiffs,

v.

WES ALLEN, in his official
capacity as Alabama Secretary of
State, et al.,

Defendants.

Case No.: 2:21-cv-1291-AMM

THREE-JUDGE COURT

EVAN MILLIGAN, et al.,

Plaintiffs,

v.

WES ALLEN, in his official
capacity as Secretary of State of
Alabama, et al.,

Defendants.

Case No.: 2:21-cv-01530-AMM

THREE-JUDGE COURT

MARCUS CASTER, et al.,

Plaintiffs,

v.

WES ALLEN, in his official
Capacity as Alabama Secretary of
State, et al.,

Defendants.

Case No.: 2:21-cv-01536-AMM



NOTICE TO TAKE THE DEPOSITION OF PLAINTIFF REV. ANDREW WALKER

PLEASE TAKE NOTICE that, pursuant to Rule 30 of the Federal Rules of Civil Procedure, Representative Chris Pringle, Senator Steve Livingston, and Secretary of State Wes Allen, will take the deposition of *Singleton* plaintiff, the **Rev. Andrew Walker**, before an officer authorized to administer oaths on **Tuesday, July 11, 2024**, at **1:00 p.m. (Central)**, at the office of **Balch and Bingham LLP, 445 Dexter Avenue, Montgomery, Alabama**.

The deposition will be recorded by stenographic means and will continue until it is adjourned. This examination will be subject to further continuance from time to time and place to place until completed, not to exceed seven hours absent agreement of the parties or order of the court.

Done this the 25th day of June, 2024,

/s/ Dorman Walker

Dorman Walker (ASB-9154-R81J)
BALCH & BINGHAM LLP
Post Office Box 78 (36101)
445 Dexter Avenue
Montgomery, Alabama 36104
Telephone: (334) 269-3138
Email: dwalker@balch.com

Michael P. Taunton (ASB-6853-H00S)
BALCH & BINGHAM LLP
Post Office Box 306
Birmingham, Alabama 35201
Telephone: (205) 251-8100
Facsimile: (205) 226-8799

mtaunton@balch.com

***Counsel for Senator Livingston and
Representative Pringle***

Steve Marshall

Attorney General

Edmund G. LaCour Jr. (ASB-9182-U81L)

Solicitor General

A. Barrett Bowdre (ASB-2087-K29V)

Deputy Solicitor General

Soren A. Geiger (ASB-0336-T31L)

Assistant Solicitor General

James W. Davis (ASB-4063-I58J)

Deputy Attorney General

Richard D. Mink (ASB-4802-M76R)

Misty S. Fairbanks Messick (ASB-1813-T71F)

Brenton M. Smith (ASB-1656-X27Q)

Benjamin M. Seiss (ASB-2110-O00W)

Charles A. McKay (ASB-7256-K18K)

Assistant Attorneys General

OFFICE OF THE ATTORNEY GENERAL

STATE OF ALABAMA

501 Washington Avenue

P.O. Box 300152

Montgomery, Alabama 36130-0152

Telephone: (334) 242-7300

Fax: (334) 353-8400

Edmund.LaCour@AlabamaAG.gov

Barrett.Bowdre@AlabamaAG.gov

Soren.Geiger@Alabama.AG.gov

Jim.Davis@AlabamaAG.gov

Richard.Mink@AlabamaAG.gov

Misty.Messick@AlabamaAG.gov

Brenton.Smith@AlabamaAG.gov

Ben.Seiss@AlabamaAG.gov

Charles.McKay@AlabamaAG.gov

***Counsel for Secretary of State Wes
Allen***

CERTIFICATE OF SERVICE

I certify that on June 25, 2024, I served the foregoing by electronic mail to all counsel of record for the plaintiffs.

/s/ Dorman Walker
*Counsel for Rep. Chris Pringle and Sen.
Steve Livingston*