

BOBBY SINGLETON, et al.

vs

WES ALLEN, et al.

REV. DARRYL ANDREWS

July 11, 2024

Rev. Darryl Andrews

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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 REV. DARRYL ANDREWS</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 REV. DARRYL ANDREWS</p> <p>5 may be taken before David Miller, Registered Merit</p> <p>6 Reporter and Notary Public, at the offices of Balch</p> <p>7 & Bingham, 445 Dexter Avenue, Suite 800,</p> <p>8 Montgomery, Alabama, on July 11, 2024, commencing</p> <p>9 at approximately 9:00 A.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 9</p> <p>5 Certificate 76</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 17</p> <p>12 DEF EX 2 Handwritten notes 27</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>

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<p style="text-align: right;">Page 5</p> <p>1 A P P E A R A N C E S</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 NAACP LEGAL DEFENSE FUND</p> <p>16 Colin Burke (Virtual)</p> <p>17 Kathryn Sadasivan (Virtual)</p> <p>18 700 14TH Street</p> <p>19 Suite 600</p> <p>20 Washington, DC 20005</p> <p>21</p> <p>22</p> <p>23</p>	<p style="text-align: right;">Page 7</p> <p>1 A P P E A R A N C E S</p> <p>2</p> <p>3 FOR SENATOR LIVINGSTON and REPRESENTATIVE PRINGLE:</p> <p>4 BALCH & BINGHAM, LLP</p> <p>5 Michael P. Taunton</p> <p>6 (Virtual)</p> <p>7 1901 Sixth Avenue North</p> <p>8 Suite 1500</p> <p>9 Birmingham, Alabama 35203</p> <p>10</p> <p>11</p> <p>12 ALSO PRESENT:</p> <p>13 Emma Beth Hill</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 6</p> <p>1 A P P E A R A N C E S</p> <p>2</p> <p>3 WIGGINS, CHILDS, PANTAZIS, FISHER</p> <p>4 & GOLDFARB</p> <p>5 Sydney Jackson (Virtual)</p> <p>6 The Kress Building</p> <p>7 301 19th Street North</p> <p>8 Birmingham, Alabama 35203</p> <p>9</p> <p>10 FOR THE DEFENDANT, WES ALLEN:</p> <p>11 OFFICE OF THE ATTORNEY GENERAL,</p> <p>12 STATE OF ALABAMA</p> <p>13 James W. Davis (Virtual)</p> <p>14 Misty S. Fairbanks Messick (Virtual)</p> <p>15 501 Washington Avenue</p> <p>16 Montgomery, Alabama 36130</p> <p>17</p> <p>18 FOR SENATOR LIVINGSTON and REPRESENTATIVE PRINGLE:</p> <p>19 BALCH & BINGHAM, LLP</p> <p>20 Dorman Walker</p> <p>21 105 Tallapoosa Street</p> <p>22 Suite 200</p> <p>23 Montgomery, Alabama 36104</p>	<p style="text-align: right;">Page 8</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 9:00 A.M. on July 11, 2024, REV.</p> <p>9 DARRYL ANDREWS, witness in the above cause, for</p> <p>10 oral examination, whereupon the following</p> <p>11 proceedings were had:</p> <p>12</p> <p>13 REV. DARRYL ANDREWS,</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: Usual</p> <p>18 stipulations?</p> <p>19 MR. PENN: Yes.</p> <p>20 MR. WALKER: Usual stipulations. We</p> <p>21 would like the witness to read and sign, please.</p> <p>22 MR. PENN: That's fine.</p> <p>23 MR. WALKER: Will you hold that up</p>

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<p style="text-align: right;">Page 9</p> <p>1 for the camera please, Reverend. 2 To the people who are on line, if 3 you want the documents that I might use as exhibits 4 during this deposition send an email to LAlvarez at 5 Balch.com and she will send them to you. 6 I'm not sure that I will use them or 7 all of them, but that is the universe of things 8 that I expect to use, with the addition of some 9 notes that we just made a copy of. 10 Can they hear us? 11 STENOGRAPHIC REPORTER: Yes, sir. 12 13 EXAMINATION BY MR. WALKER: 14 Q. Reverend Andrews, we met a little 15 awhile ago, but let me -- let me introduce myself 16 again on the record. 17 I'm Dorman Walker, and I represent 18 the Legislative defendants in the Singleton suit 19 which, as you know, is one of the three suits to 20 challenge Alabama's Congressional Districts as they 21 were enacted in 2023. 22 So because you're a named plaintiff 23 in this case we want to take your deposition and</p>	<p style="text-align: right;">Page 11</p> <p>1 Q. I figured that was it. 2 A. I don't even have -- we don't have a 3 physical address because all of the mail goes to -- 4 it's a family church. 5 Q. What is the name of it? 6 A. Mountain View Baptist Church. 7 Q. Okay. 8 A. On Bullock County Road 19. 9 Q. Reverend Andrews, let me show you 10 what I'm going to mark -- well, we will get to that 11 in a second. 12 You are Reverend Darryl Andrews. 13 Have you ever spelled your name differently or gone 14 by a different name? 15 A. No. 16 Q. And do you understand that in this 17 deposition you're testifying under oath? 18 A. Yes. 19 Q. It's the same as if you were sitting 20 in the witness box in Federal Court? 21 A. Yes. 22 Q. Okay. Is there anything that might 23 prevent you from understanding and answering</p>
<p style="text-align: right;">Page 10</p> <p>1 find out what you know and think about the case. 2 Now, this is a little bit different 3 in some ways from other cases. If this were a car 4 wreck case, I would expect you to know about the 5 car wreck that you were in. 6 This is a Voting Rights case. It's 7 a little bit metaphysical, and you may not know as 8 much as you would if, again, it were a car wreck 9 case. 10 But we will just cover that stuff. 11 If you don't know stuff, just say, "I don't know," 12 that's fine. And just answer the questions that 13 I'm going to ask you, if you don't mind. 14 Would you start by stating your 15 name, for the record. 16 A. Darryl Andrews. 17 Q. And am I correct that you are a 18 pastor? 19 A. Yes. 20 Q. Where -- 21 A. It's in Bullock County. 22 Q. Bullock County? 23 A. Yes.</p>	<p style="text-align: right;">Page 12</p> <p>1 truthfully my questions today? 2 For example, have you taken any 3 medication that might affect your ability to 4 understand and answer truthfully? 5 A. Not today. 6 Q. Okay. And you are represented by a 7 lawyer today; is that correct? 8 A. Yes. 9 Q. Okay. Have you ever been deposed 10 before? 11 A. Yes. 12 Q. How many times? 13 A. Oh, maybe two or three. 14 Q. Two or three. Okay. 15 Can you tell us about -- basically, 16 I guess, identify each one of those. 17 A. Well, I can only just recall one of 18 them exactly what was going on. It was on my job 19 and I -- I did depositions on that. And it was 20 about -- an incident that happened on the job. 21 But I really didn't have much to say 22 because it was like ten years past, and so I 23 didn't -- you know, I didn't know much -- didn't</p>

<p style="text-align: right;">Page 13</p> <p>1 remember much. That's when I started writing 2 notes. 3 Q. I understand. 4 And what were the other -- you said 5 two or three. What were the other -- 6 A. Well, I don't recall what they were. 7 Q. Were they awhile ago? 8 A. Oh, yes. 9 Q. Okay. 10 A. Yeah. 11 Q. Did they have anything to do with 12 Voting Rights? 13 A. No. 14 Q. We will come back and talk about 15 that first deposition in a second. But first let's 16 go over some of the rules of the deposition since 17 it's been awhile since you have been deposed. 18 I will be asking you questions. 19 After I finish other people -- I think we have 20 Mr. Jim Davis from the Attorney General's office 21 representing the Secretary of State participating 22 virtually, as well as Mr. Blacksher participating 23 virtually. They may want to ask you some questions</p>	<p style="text-align: right;">Page 15</p> <p>1 but not a -- sometimes we would say uh-huh or a nod 2 of the head or something like that. He can't take 3 that down, okay? 4 A. Okay. 5 Q. Thank you. 6 During the deposition you may hear 7 your lawyer say, "Object to the form," when I ask a 8 question. When he says that, that's a technical 9 objection that he is making to tell me that he 10 thinks there is something wrong with the question 11 that I may be asking. 12 And it's an opportunity for me to 13 rephrase the question. I may rephrase the 14 question, I may not, but you can go ahead and 15 answer the question. 16 But you might want to leave a little 17 space for your lawyer to make that type of 18 objection when I ask a question. 19 Barring something very unusual, I 20 don't intend to ask you about anything that's 21 privileged such as what you said to your lawyers or 22 what they said to you. If that were to happen, 23 your attorney would, I'm sure, insert the privilege</p>
<p style="text-align: right;">Page 14</p> <p>1 when I finish. 2 If I ask you a question that for 3 whatever reason you don't understand, please let me 4 know and I will try to rephrase it so that you do 5 understand it, okay? 6 A. Okay. 7 Q. If you answer a question I will 8 assume that you understood it; fair? 9 A. Okay. 10 Q. We have, as you can see, a court 11 reporter typing down -- I guess that's the word we 12 use -- typing everything that we say. 13 And because he is typing as we talk 14 it's important that we wait for each one of us to 15 finish before we start talking. And I'm sure that 16 at some point in this deposition I will interrupt 17 you -- I'm confident that will happen -- and you 18 might interrupt me. We need to be on guard against 19 that happening, okay? 20 A. Okay. 21 Q. In addition, we also need to -- you 22 need to respond to my questions verbally, if you 23 don't mind, with a yes, no, or narrative answer,</p>	<p style="text-align: right;">Page 16</p> <p>1 and instruct you not to answer the question. We 2 would deal with that if it happened. I don't 3 expect that will be the case today. I don't intend 4 to go into any privileged information. 5 I think this will be a fairly short 6 deposition. We have got two depositions planned 7 today, and I don't really see any reason why this 8 needs to be a long deposition unless you just turn 9 into a fountain of information. And if you do, we 10 will go with it till we get what you got. 11 But we normally take a break about 12 on the hour. If you feel a need to take a break 13 before then, that's perfectly fine, just let me 14 know. The only rule is we don't take a break if 15 there is a question pending. 16 So if you need to take a break and I 17 have asked you a question, answer the question and 18 then we will take a break, okay? 19 A. Okay. 20 Q. Let me show you what I have marked 21 as Defendant's Exhibit 1. 22 23</p>

<p style="text-align: right;">Page 17</p> <p>1 (WHEREUPON, a document was marked as 2 Defendant's Exhibit 1 and a copy of the same is 3 attached hereto) 4 5 Q. I will represent to you that that is 6 -- if I have given you the right one -- a copy of 7 the notice for your deposition. 8 Have you seen this before? 9 A. Yes. 10 Q. Okay. Were you saying yes to me 11 or -- 12 A. Yes. 13 Q. When did you first see it? 14 A. I don't recall. I can't give you 15 dates or anything. 16 Q. A few weeks ago? 17 A. Whenever it came out, that's when I 18 saw it. Like I said, I can't give you a date. 19 Q. Was it mailed to you or was it in a 20 meeting or by an email or do you recall? 21 A. I don't recall. 22 Q. I want to ask you some questions 23 about what you did to prepare for your deposition</p>	<p style="text-align: right;">Page 19</p> <p>1 A. Once again, I can't give you a date 2 or a time or anything. 3 Q. Was it within the last week, do you 4 think? 5 A. I spoke with them on the phone 6 yesterday. 7 Q. Other than the conversation that you 8 had with your attorneys on the phone yesterday, 9 have you had any other meetings with your attorneys 10 or anyone else to prepare for this deposition? 11 A. I have spoken with them, yes, of 12 course. 13 Q. Other than the phone conversation 14 yesterday? 15 A. Right. 16 Q. When were the other times when you 17 spoke? 18 A. Once again, I don't remember. 19 Q. Was it within the last, say, two 20 weeks, three weeks; do you know? 21 A. Like I said, I don't want to lie. I 22 don't remember. I know that I did speak to them, 23 truthfully, I can say yesterday on the phone, yeah.</p>
<p style="text-align: right;">Page 18</p> <p>1 today. I may ask you who you met with, and you can 2 tell me that you met with your lawyer or somebody 3 like that. 4 I'm not going to ask you what people 5 said, okay, because I don't want to get into the 6 privilege. 7 What did you do to prepare for your 8 deposition today, if you did anything? 9 A. Well, I'll be honest, the first 10 thing I did I prayed -- 11 Q. That's a good thing to do. 12 A. -- and -- seriously about that. But 13 I kind of went over some of the things in my mind 14 that was important to me about this case as it is, 15 being one of the plaintiffs. 16 So I just -- that's what I was 17 doing, jotting down some notes of the problems that 18 I had with what's going on, so -- and that's it. 19 Q. Did you -- did you meet with your 20 attorneys or with any of the other plaintiffs? 21 A. Of course, yes. 22 Q. When did you meet with your 23 attorneys?</p>	<p style="text-align: right;">Page 20</p> <p>1 Q. And I'm just going to assume that 2 the other conversation or conversations that you 3 are referring to came after you received the Notice 4 of Deposition. 5 A. Once again, I'm not for sure. 6 Q. Let's just take it one by one. 7 Do you think that in meeting with 8 them to prepare for this -- you had a phone call 9 yesterday. Did you have one, two, three, or more 10 meetings with them, other than the phone call? 11 A. Once again, I don't remember. I 12 know that I -- I can't -- you keep asking me the 13 questions and it's like you are asking me the same 14 thing, you're just turning it around. But, no, I 15 don't. 16 Q. Well, that's going to happen a lot 17 because -- 18 A. Okay. 19 Q. -- I'm going to try to get down to 20 be very specific about things. And I'm not trying 21 to trip you up, I'm just trying to -- my job is to 22 make sure I ask you the right questions and cover 23 stuff.</p>

<p style="text-align: right;">Page 21</p> <p>1 A. I have no problem with that.</p> <p>2 Q. That's what I'm trying to do.</p> <p>3 Do you recall one time, other than</p> <p>4 the phone call, when you met with anyone to prepare</p> <p>5 for this deposition?</p> <p>6 A. No, I don't.</p> <p>7 Q. Let's talk about the phone call that</p> <p>8 you had yesterday. Who was on the phone?</p> <p>9 A. The attorney and --</p> <p>10 Q. When you said the attorney, did you</p> <p>11 mean Mr. Myron Penn, who is here with us here</p> <p>12 today?</p> <p>13 A. Yes.</p> <p>14 Q. Were there any other attorneys?</p> <p>15 Was Mr. James Blacksher on the</p> <p>16 phone?</p> <p>17 A. Yes.</p> <p>18 Q. Mr. Blacksher. Okay.</p> <p>19 What about Mr. Whatley?</p> <p>20 A. Not that I know of.</p> <p>21 Q. Was Ms. Zimmerman on the phone?</p> <p>22 A. Not that I know of.</p> <p>23 Q. Anyone else other than you and</p>	<p style="text-align: right;">Page 23</p> <p>1 Q. An hour?</p> <p>2 A. I don't know.</p> <p>3 Q. You just don't know. That's fine.</p> <p>4 A. Yeah.</p> <p>5 Q. Were you shown or sent any documents</p> <p>6 to review in connection with this -- with this</p> <p>7 conference call?</p> <p>8 A. No.</p> <p>9 Q. Okay. Did you meet with any of your</p> <p>10 attorneys or anyone else in preparation for this</p> <p>11 meeting and at that time review documents?</p> <p>12 Did I ask that question clearly?</p> <p>13 MR. PENN: Object to the form. If</p> <p>14 you will --</p> <p>15 Q. Let me ask it again. It got a</p> <p>16 little convoluted.</p> <p>17 You have told us about a telephone</p> <p>18 call that you had yesterday with your counsel and</p> <p>19 with one other plaintiff. And I'm generally asking</p> <p>20 about what you did to prepare for this deposition.</p> <p>21 Did you have any in-person meeting</p> <p>22 with anyone at which time you reviewed documents?</p> <p>23 A. No.</p>
<p style="text-align: right;">Page 22</p> <p>1 Mr. Penn on the phone?</p> <p>2 A. You just asked me was Mr. Blacksher.</p> <p>3 Q. That's right. You and Mr. Penn and</p> <p>4 Mr. Blacksher.</p> <p>5 Anyone other than the three of you</p> <p>6 on the phone?</p> <p>7 A. I think another one of the</p> <p>8 plaintiffs were -- was on.</p> <p>9 Q. Do you know if it was the Reverend</p> <p>10 Andrew Walker?</p> <p>11 A. Right. Right.</p> <p>12 Q. Okay. And so it was the four of</p> <p>13 y'all, so far as you recall, or was there anyone</p> <p>14 else?</p> <p>15 A. As far as I know, that's all.</p> <p>16 Q. And when did this phone call start?</p> <p>17 A. All I can say was yesterday.</p> <p>18 Q. Was it in the morning or afternoon?</p> <p>19 A. Afternoon.</p> <p>20 Q. How long did it last?</p> <p>21 A. I don't know.</p> <p>22 Q. Would you say it lasted two hours?</p> <p>23 A. I don't know.</p>	<p style="text-align: right;">Page 24</p> <p>1 Q. Okay. So is it fair to say that you</p> <p>2 have not reviewed any documents in preparation for</p> <p>3 this deposition?</p> <p>4 A. Not in person with anyone.</p> <p>5 Q. Okay. What do you mean by that, not</p> <p>6 in person?</p> <p>7 A. Well, you asked me did I -- have I</p> <p>8 seen any documents. And I answered that yes, I</p> <p>9 have seen. But I was -- I have not been in person</p> <p>10 with anyone with them, no.</p> <p>11 Q. Okay. What documents are you</p> <p>12 referring to that you have seen?</p> <p>13 MR. PENN: I will object to the</p> <p>14 form.</p> <p>15 Dorman, are you speaking of any</p> <p>16 documents that were prepared with the attorneys or</p> <p>17 just any documents? Just to be clear, I don't want</p> <p>18 to get into any kind of attorney/client --</p> <p>19 MR. WALKER: I don't want to get</p> <p>20 into privilege. I think I'm entitled to know what</p> <p>21 documents he's looked at, even if they are</p> <p>22 privileged, because that would be on a privilege</p> <p>23 log, but I am not going to ask him anything about</p>

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<p style="text-align: right;">Page 25</p> <p>1 them.</p> <p>2 MR. PENN: Okay.</p> <p>3 Q. (BY MR. WALKER) Reverend Andrews,</p> <p>4 what I'm trying to find out is what documents do</p> <p>5 you recall looking at in preparation for this</p> <p>6 deposition, regardless of whether you were with</p> <p>7 someone or not?</p> <p>8 Just tell me the names of the</p> <p>9 documents or identify them, as best you can.</p> <p>10 A. I can't tell you the name, but I</p> <p>11 looked -- they were -- they had -- when the lawsuit</p> <p>12 came up that everything that was publicly -- that's</p> <p>13 what I'm talking about.</p> <p>14 Q. Okay.</p> <p>15 A. Yeah.</p> <p>16 Q. That was some time ago, it sounds</p> <p>17 like.</p> <p>18 A. Okay.</p> <p>19 Q. Is that correct?</p> <p>20 A. Yeah.</p> <p>21 Q. Okay. Other than the conversation</p> <p>22 you had yesterday for an indeterminate period of</p> <p>23 time with two of your lawyers and with one of the</p>	<p style="text-align: right;">Page 27</p> <p>1 Q. Okay. I won't belabor the point.</p> <p>2 Let's talk briefly about -- I'm</p> <p>3 going to mark as Exhibit 2 your notes.</p> <p>4</p> <p>5 (WHEREUPON, a document was marked as</p> <p>6 Defendant's Exhibit 2 and a copy of the same is</p> <p>7 attached hereto)</p> <p>8</p> <p>9 A. Okay.</p> <p>10 Q. And I'm going to mark this.</p> <p>11 Normally I'm giving you the numbered exhibits, but</p> <p>12 you've got your notes right there and I have got a</p> <p>13 copy here.</p> <p>14 A. Uh-huh (Nodding head).</p> <p>15 Q. Let's just go down.</p> <p>16 MR. WALKER: And, Jim and Jim, this</p> <p>17 will not be in the exhibits that you have if you</p> <p>18 have asked Ligia to send those to you because I</p> <p>19 just made this copy. But we will get it to you.</p> <p>20 Q. (BY MR. WALKER) Let's go over these</p> <p>21 notes very quickly.</p> <p>22 And my understanding was, from our</p> <p>23 conversation earlier, these are notes that you made</p>
<p style="text-align: right;">Page 26</p> <p>1 plaintiffs, did you do anything else to prepare for</p> <p>2 this deposition other than pray?</p> <p>3 A. No.</p> <p>4 Q. Okay. Thank you.</p> <p>5 Have you looked at any maps?</p> <p>6 A. No more than when -- what was, you</p> <p>7 know, publicly on -- the same way with that.</p> <p>8 Q. Things that were online or something</p> <p>9 like that?</p> <p>10 A. Right.</p> <p>11 Q. When you say publicly, you mean</p> <p>12 available online?</p> <p>13 A. Right.</p> <p>14 Q. Do you recall what maps you looked</p> <p>15 at?</p> <p>16 A. No.</p> <p>17 Q. Okay. Do you know if you looked at</p> <p>18 a copy of the 2021 Congressional Plan?</p> <p>19 A. I don't recall. I really don't</p> <p>20 know.</p> <p>21 Q. And if I asked you about others,</p> <p>22 would it be the same thing, you don't know?</p> <p>23 A. It would be the same thing.</p>	<p style="text-align: right;">Page 28</p> <p>1 to yourself to help you with your testimony today;</p> <p>2 things that you were thinking about?</p> <p>3 A. Yes. These are things that</p> <p>4 concerned me that -- about the case itself.</p> <p>5 Q. Would you just maybe explain these</p> <p>6 notes -- what you were thinking about on these</p> <p>7 various entries.</p> <p>8 Start with the top to bottom or</p> <p>9 however you want to do it.</p> <p>10 A. Okay. Well, on these notes I was</p> <p>11 thinking about what -- what was the problem that I</p> <p>12 had with what's going on. And it's -- in this I</p> <p>13 have the Voting Rights Act and the Constitution.</p> <p>14 And I believe that it should --</p> <p>15 everything should remain where -- well, the problem</p> <p>16 that I had with it was that the black voters wasn't</p> <p>17 being provided an equal opportunity as the Voters</p> <p>18 Right Act and the Constitution agreed for.</p> <p>19 I disagreed with what was going on,</p> <p>20 but I did -- looking at the preliminary judgment of</p> <p>21 the Voters Right Act, I agreed with that -- what</p> <p>22 the court had ordered for 2024.</p> <p>23 And I really didn't like the</p>

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<p style="text-align: right;">Page 29</p> <p>1 Attorney General's plan to just strike down the</p> <p>2 Voters Rights Act and the Constitution -- the</p> <p>3 judgment that had already been passed.</p> <p>4 This was -- I felt that it was in</p> <p>5 violation or weakens or it dilutes our -- and it's</p> <p>6 intentionally discriminatory to me and it</p> <p>7 segregates by race and prevents multi-racial and --</p> <p>8 opportunities here.</p> <p>9 And also on the notes I have no</p> <p>10 early voting. This was another thing that has been</p> <p>11 a concern of mine -- why we don't have early</p> <p>12 voting, as well as -- they've come out with this</p> <p>13 Project 2025 that will destroy black voters or</p> <p>14 black people as a whole.</p> <p>15 So this is all that is on this</p> <p>16 notes.</p> <p>17 Q. I want to ask you more specifically</p> <p>18 about these, and maybe I will start at the bottom.</p> <p>19 Project 25, as I understand it from</p> <p>20 something that I was watching last night, is a</p> <p>21 project by what I believe is called the Heritage</p> <p>22 Foundation for changes they want to make, I guess,</p> <p>23 in the American Government.</p>	<p style="text-align: right;">Page 31</p> <p>1 Pringle.</p> <p>2 Are you aware that any of them -- or</p> <p>3 do you have a complaint that any of them played any</p> <p>4 role in the development of Project 2025?</p> <p>5 A. I don't know who developed it.</p> <p>6 Q. Okay.</p> <p>7 A. I just browsed over it and --</p> <p>8 Q. This is just something that concerns</p> <p>9 you?</p> <p>10 A. Yes, uh-huh (Nodding head).</p> <p>11 Q. But not necessarily in this lawsuit?</p> <p>12 A. Right.</p> <p>13 Q. Okay. And also you talked about</p> <p>14 early voting. And are you aware that early voting</p> <p>15 is not an issue in this lawsuit?</p> <p>16 A. I understand that.</p> <p>17 Q. Okay.</p> <p>18 A. Yes.</p> <p>19 Q. Going up to the top you indicated</p> <p>20 that the -- if I understood your testimony</p> <p>21 correctly -- and if I misstate your testimony, I'm</p> <p>22 not trying to, so let me know, okay?</p> <p>23 A. Yes.</p>
<p style="text-align: right;">Page 30</p> <p>1 Is that what you are referring to?</p> <p>2 A. Yes. But it's -- it's -- it's</p> <p>3 Republicanly motivated and it's based on Trump</p> <p>4 getting back in office. This is a plan and -- the</p> <p>5 bullet points that I got out of it is -- it was</p> <p>6 more taxes on the middle class and the poor people,</p> <p>7 and it was nothing to help build up, but it was to</p> <p>8 tear down. So I'm against that all around.</p> <p>9 Q. Do you understand that Project 2025</p> <p>10 is not being challenged in this lawsuit?</p> <p>11 A. I -- I know this, but --</p> <p>12 Q. All right.</p> <p>13 A. -- once again, these are things that</p> <p>14 -- that are important to me and that I thought that</p> <p>15 I would -- I would bring it up --</p> <p>16 Q. Okay.</p> <p>17 A. -- because it's -- you know, it's</p> <p>18 discriminatory and this is the problem that I have</p> <p>19 with this -- what's going on.</p> <p>20 Q. But just to be clear. The</p> <p>21 defendants named in the Second Amended Complaint</p> <p>22 are the Alabama Secretary of State, Wes Allen,</p> <p>23 Senator Steve Livingston, and Representative Chris</p>	<p style="text-align: right;">Page 32</p> <p>1 Q. That would be one of those things</p> <p>2 where I need you to let me know.</p> <p>3 You have the Voting Rights Act and</p> <p>4 the Constitution. And then you say, "Black voters</p> <p>5 provide equal opportunity." And I understand you</p> <p>6 to say that your understanding was that the</p> <p>7 Constitution and the Voting Rights Act provide</p> <p>8 black voters with equal opportunity to elect their</p> <p>9 candidates of choice.</p> <p>10 Is that a correct statement?</p> <p>11 A. Yes. And what's being done -- what</p> <p>12 is -- is not being protected, I will say it like</p> <p>13 that. This is in my own words.</p> <p>14 Q. I understand.</p> <p>15 And what is your understanding of</p> <p>16 what is meant by that phrase, "Equal opportunity to</p> <p>17 elect your candidate of choice?"</p> <p>18 What is equal opportunity for black</p> <p>19 voters to elect their candidate of choice?</p> <p>20 A. Well, first of all, it's the same</p> <p>21 thing -- equal opportunity is the same for black</p> <p>22 and white.</p> <p>23 So -- but my thing is that we, as</p>

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<p style="text-align: right;">Page 33</p> <p>1 blacks, have been discriminated against. And the</p> <p>2 -- when I came up I knew about the -- and I was</p> <p>3 part of the separation. The blacks here and the</p> <p>4 whites here or whatever. And we didn't have the</p> <p>5 same opportunity.</p> <p>6 So this is the thing. Equal --</p> <p>7 everybody was treated equal. That's what I'm --</p> <p>8 Q. Well, let's drill down on that a</p> <p>9 little bit.</p> <p>10 Are you registered to vote?</p> <p>11 A. Yes.</p> <p>12 Q. When, sir, did you register to vote?</p> <p>13 A. I don't remember.</p> <p>14 Q. When you turned eighteen maybe, or</p> <p>15 some time after that?</p> <p>16 A. I don't know what the age was. As</p> <p>17 soon as I could, I did.</p> <p>18 Q. Did you have any difficulty</p> <p>19 registering to vote?</p> <p>20 A. No, I didn't.</p> <p>21 Q. Where did you register to vote?</p> <p>22 A. I think I was in Bullock County.</p> <p>23 Q. Is that where you grew up?</p>	<p style="text-align: right;">Page 35</p> <p>1 not that -- because I haven't been personally a</p> <p>2 part of it. But I have heard that different people</p> <p>3 have. So I can't just speak on it.</p> <p>4 Q. Can you provide me -- when you say</p> <p>5 you've heard that different people have, are you</p> <p>6 saying that you have heard that different black</p> <p>7 people have or different white people have or was</p> <p>8 it by race?</p> <p>9 A. Different people.</p> <p>10 Q. Different people?</p> <p>11 A. Yes.</p> <p>12 Q. Can you provide any information</p> <p>13 about that, about the race of the people or about</p> <p>14 what the problem they had was?</p> <p>15 A. Well, not just -- I can't provide it</p> <p>16 because I don't know for sure. Like I said, this</p> <p>17 is something that I heard; that's it.</p> <p>18 Q. And, in summary, is it fair to say</p> <p>19 that you did not have any trouble registering to</p> <p>20 vote yourself?</p> <p>21 A. Yes, sir.</p> <p>22 Q. And you don't have any personal</p> <p>23 experience with anyone else having difficulty</p>
<p style="text-align: right;">Page 34</p> <p>1 A. Yes.</p> <p>2 Q. What community would you say that</p> <p>3 you lived in?</p> <p>4 A. Well, I guess they call it Perote,</p> <p>5 the Corinth opportunity.</p> <p>6 Q. Can you spell that for the court</p> <p>7 reporter.</p> <p>8 A. P-E-R-O-T-E.</p> <p>9 Q. And so you would have -- you would</p> <p>10 have registered, I guess, in Union Springs at the</p> <p>11 courthouse there?</p> <p>12 A. That's correct.</p> <p>13 Q. Have you ever helped anybody to</p> <p>14 register to vote?</p> <p>15 A. Well, I have -- I have taken people</p> <p>16 to register, yes.</p> <p>17 Q. Did they have any difficulty in</p> <p>18 registering?</p> <p>19 A. No, not that I know of.</p> <p>20 Q. So far as you know, do white</p> <p>21 Alabamians and black Alabamians have equal</p> <p>22 opportunities to register to vote?</p> <p>23 A. I can't speak on that because I --</p>	<p style="text-align: right;">Page 36</p> <p>1 registering to vote?</p> <p>2 A. Let me see how -- if you are asking</p> <p>3 this. Now, you said did I have any personal</p> <p>4 experience --</p> <p>5 Q. Yes, sir.</p> <p>6 A. -- with anybody that had problems</p> <p>7 registering to vote?</p> <p>8 Q. That's what I said.</p> <p>9 A. Well, yes. If you put it like that,</p> <p>10 my parents -- they had problems.</p> <p>11 Q. Was that back in the '60s or</p> <p>12 something?</p> <p>13 A. Oh, it was probably before then.</p> <p>14 Q. Back in the -- in the Civil Rights</p> <p>15 era or pre-Civil Rights era?</p> <p>16 A. Yes.</p> <p>17 Q. Thank you. Let me ask you the</p> <p>18 question a little bit better.</p> <p>19 Do you have any personal experience</p> <p>20 of anyone in the present era in --</p> <p>21 A. No.</p> <p>22 Q. Let me finish my question --</p> <p>23 A. Okay.</p>

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<p style="text-align: right;">Page 37</p> <p>1 Q. -- so the record will be clear.</p> <p>2 Do you have any personal experience</p> <p>3 with anyone in the present era having difficulty</p> <p>4 registering to vote in Alabama?</p> <p>5 A. No.</p> <p>6 Q. Thank you.</p> <p>7 We are still talking about what that</p> <p>8 phrase equal opportunity to vote means. When you</p> <p>9 go to vote, at the various times that you go to</p> <p>10 vote for elections or primaries or whatever,</p> <p>11 runoffs, do you have any difficulty knowing where</p> <p>12 you are supposed to vote.</p> <p>13 A. I have had -- yes, uh-huh.</p> <p>14 Q. And, sir, do you vote in Montgomery</p> <p>15 or do you vote in Bullock County?</p> <p>16 A. Montgomery.</p> <p>17 Q. Where do you vote?</p> <p>18 A. Over on Fisk Road. Fisk Road.</p> <p>19 Q. F-I-S-K Road?</p> <p>20 A. Yes.</p> <p>21 Q. What is the polling place over</p> <p>22 there?</p> <p>23 A. The church --</p>	<p style="text-align: right;">Page 39</p> <p>1 A. No.</p> <p>2 Q. And in the last ten years have you</p> <p>3 had any difficulty in casting your vote when you</p> <p>4 went to vote?</p> <p>5 A. No.</p> <p>6 Q. Are you aware of anyone in the last</p> <p>7 ten years who had difficulty in knowing where they</p> <p>8 were supposed to vote?</p> <p>9 A. Yes.</p> <p>10 Q. Tell us about that, if you would.</p> <p>11 A. Well, several friends of mine was</p> <p>12 just like me -- what I told you that happened to</p> <p>13 me. They didn't receive notice. They went to</p> <p>14 where they had been polling -- as a matter of fact,</p> <p>15 one of my daughters was the same way.</p> <p>16 And -- but they didn't receive</p> <p>17 notification that their polling place had been</p> <p>18 changed.</p> <p>19 Q. Were they -- when they went to the</p> <p>20 polling place that they thought they were supposed</p> <p>21 to vote at were they told where they should vote?</p> <p>22 A. Yes.</p> <p>23 Q. And were they able to go there?</p>
<p style="text-align: right;">Page 38</p> <p>1 Q. Whitfield?</p> <p>2 A. That's correct. Whitfield</p> <p>3 Methodist.</p> <p>4 Q. That's right.</p> <p>5 And has that been changed or</p> <p>6 something like that?</p> <p>7 Is that what you were referring to</p> <p>8 when you had problems?</p> <p>9 A. No. It's when I was living in a</p> <p>10 different district or different polling precinct, I</p> <p>11 -- the polling places was changed without giving</p> <p>12 notification that the polling place had changed.</p> <p>13 Q. You didn't receive that postcard</p> <p>14 that we normally get before an election?</p> <p>15 A. Not at that time, no.</p> <p>16 Q. When was that, do you know?</p> <p>17 A. I don't remember.</p> <p>18 Q. Would you say it's was ten years ago</p> <p>19 or more or less?</p> <p>20 A. It was more than ten years ago.</p> <p>21 Q. Okay. And in the last, let's say,</p> <p>22 ten years have you had any difficulty in knowing</p> <p>23 where you were supposed to vote?</p>	<p style="text-align: right;">Page 40</p> <p>1 A. Yes. They had to do -- I don't</p> <p>2 know -- fill out some kind --</p> <p>3 Q. That happened to me, too. Something</p> <p>4 like that happened a few years ago, I recall. I</p> <p>5 wound up voting on -- I usually vote at Cloverdale</p> <p>6 and for some reason I had to vote on Rosa Parks.</p> <p>7 I don't know why that change happened.</p> <p>8 A. Yeah.</p> <p>9 Q. Other than that, are you aware of</p> <p>10 anyone in the last ten years who had problems</p> <p>11 knowing where they were supposed to vote?</p> <p>12 A. No.</p> <p>13 Q. Okay. Are you aware of anyone in</p> <p>14 the last ten years who had problems actually voting</p> <p>15 when they went to vote?</p> <p>16 A. How do you mean problems?</p> <p>17 Q. Any sort of difficulty or impairment</p> <p>18 with voting or being told that they could not vote</p> <p>19 or anything like that.</p> <p>20 A. I can't personally say who, no.</p> <p>21 Q. Okay. And you have not had such a</p> <p>22 problem?</p> <p>23 A. No.</p>

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<p style="text-align: right;">Page 41</p> <p>1 Q. Okay. Have you ever participated in 2 party politics, either Republican or Democrat or 3 any other party? 4 A. Could you explain that. I mean, how 5 do you -- 6 Q. Well, have you ever gone to 7 meetings -- for example, the Montgomery County 8 Democratic Executive Committee or the Bullock 9 County Democratic Executive Committee or committees 10 of those Executive Committees? 11 A. If this is what you are asking -- 12 I'm not for sure. I want to make sure. I used to 13 participate with the MCDC back in the '90s. 14 Q. Okay. What does MCDC stand for? 15 A. Montgomery County Democratic 16 Conference. 17 Q. Yeah. that's what I'm talking 18 about. 19 But that was in the '90s? 20 A. Yes. 21 Q. What was the purpose of your 22 participation with the MCDC? 23 A. Well, it was -- there was a point</p>	<p style="text-align: right;">Page 43</p> <p>1 Dr. Reed and John Knight -- they were all together 2 at the time that I was -- they were MCDC at the 3 time. 4 Q. This was before the New South 5 Coalition? 6 A. Yes. 7 Q. That's some time ago. 8 Have you in the last ten years 9 attended any Republican or Democratic party 10 functions of any sort? 11 A. No. 12 Q. We have talked about registering to 13 vote, we have talked about actually voting, we have 14 talked about participating in party politics. 15 Is there any way that you can tell 16 me that we haven't talked about in which you 17 believe black voters do not have an equal 18 opportunity to elect their candidate of choice? 19 A. Well, from my knowledge of -- in 20 this lawsuit here that we don't because of the -- I 21 have here as -- that the court ordered the -- in 22 2024, okay, when the lines -- the districts -- the 23 lines were drawn, if I'm remembering correct, it</p>
<p style="text-align: right;">Page 42</p> <p>1 where I felt that I could do -- to help to get 2 people out to vote. And whatever was needed, I was 3 willing to help, you know. And that was the 4 organization that asked for my help. 5 Q. And that was the Montgomery County 6 Democratic Committee -- was that the last C? 7 A. Conference or -- 8 Q. Conference or Committee or something 9 like that? 10 A. Yes. 11 Q. Was that sponsored by the Democratic 12 party or the ADC or do you know? 13 A. I don't think it was -- I think ADC 14 and MCDC is two different -- 15 Q. Two different organizations? 16 A. Yeah. 17 Q. When I say ADC, I'm referring -- 18 A. That's Alabama. 19 Q. -- the Democratic Conference. 20 A. Right. 21 Q. That was an organization headed by, 22 I believe, Dr. Joe Reed at that time? 23 A. Okay. Yeah. Well, at the time</p>	<p style="text-align: right;">Page 44</p> <p>1 put part of -- I think it was Jefferson County that 2 was -- put it in a whole different district. So it 3 separated them. 4 But, to my knowledge and to my 5 understanding, is that this is why we are here 6 because it doesn't present an equal opportunity for 7 us to have and -- for blacks, or whatever you want 8 to say, to have two districts. 9 I'm not saying all black; I'm not 10 saying all white. It doesn't work either way. But 11 I am saying that as far as blacks I believe that we 12 need to have more than what we have. And -- I will 13 leave it at that. 14 Q. Okay. The Singleton complaint seems 15 to ask the court to enter a remedial plan that 16 creates two what are called opportunity or 17 crossover districts. 18 Are you familiar with those phrases? 19 A. Right. I remember the phrases. 20 Q. And my understanding of that is that 21 those are districts where -- where black voters 22 that are politically cohesive, acting in 23 conjunction with white voters who vote Democratic,</p>

<p style="text-align: right;">Page 45</p> <p>1 would be successful in electing a candidate who was</p> <p>2 the black candidate of choice in at least two</p> <p>3 Congressional Districts.</p> <p>4 Is that your understanding?</p> <p>5 A. Thank you. That's what I was</p> <p>6 saying.</p> <p>7 Q. Okay. And what is your basis for</p> <p>8 saying that there should be -- that equal</p> <p>9 opportunity for black voters means there should be</p> <p>10 two Congressional Districts that are -- I'm just</p> <p>11 going to call them opportunity districts or -- let</p> <p>12 me ask the question again.</p> <p>13 What is your basis for saying, if</p> <p>14 you know -- and I realize we are talking about</p> <p>15 legal arguments here and you may not have an</p> <p>16 understanding of those.</p> <p>17 And if you don't, it's -- trust me,</p> <p>18 there are plenty of people that are confused by the</p> <p>19 state of the law here. So if you don't know, just</p> <p>20 say you don't know and we will move on.</p> <p>21 But here is the question I'm trying</p> <p>22 to ask you. What is your basis for saying that</p> <p>23 equal opportunity for black voters in Alabama</p>	<p style="text-align: right;">Page 47</p> <p>1 A. Okay.</p> <p>2 Q. Okay. Congressional Districts.</p> <p>3 So here is my question. What is</p> <p>4 your basis for saying that there should be two</p> <p>5 crossover districts as opposed to one or six?</p> <p>6 MR. PENN: Object to the form.</p> <p>7 A. Based on what I read in the -- in</p> <p>8 the lawsuit that was filed, I -- what's in the -- I</p> <p>9 wrote -- like I said, I wrote this down because I</p> <p>10 know that this was what was stated in there. But</p> <p>11 as far as basing on everything that it was based</p> <p>12 on, I don't know.</p> <p>13 Q. Okay. That's perfectly fine.</p> <p>14 A. Yeah.</p> <p>15 Q. It looks like you have at least read</p> <p>16 or seen the preliminary judgment order that was</p> <p>17 entered by the three-judge court. You referred to</p> <p>18 the preliminary judgment Voting Rights Act order.</p> <p>19 A. Yes.</p> <p>20 Q. And you've got 2024 there.</p> <p>21 When did you read that primary</p> <p>22 judgment order?</p> <p>23 A. I don't know.</p>
<p style="text-align: right;">Page 46</p> <p>1 means, among other things, the creation of two</p> <p>2 Congressional Districts in which black voters</p> <p>3 acting in conjunction with white crossover voters</p> <p>4 have the opportunity to elect their candidate of</p> <p>5 choice?</p> <p>6 A. I'm not -- is there a question</p> <p>7 there?</p> <p>8 Q. There was a question.</p> <p>9 A. Okay. I missed the question part</p> <p>10 because you made the statement of what I just</p> <p>11 agreed with what you said about this.</p> <p>12 Q. Yeah.</p> <p>13 A. And you turned it into a question,</p> <p>14 what is my understanding about what was stated.</p> <p>15 Q. Let me try again.</p> <p>16 We are talking about what is</p> <p>17 necessary for black voters to have equal</p> <p>18 opportunity to elect their candidate of choice,</p> <p>19 okay?</p> <p>20 A. Okay.</p> <p>21 Q. And one of the things that I</p> <p>22 understand from you, and from the complaint, that's</p> <p>23 necessary is two crossover districts.</p>	<p style="text-align: right;">Page 48</p> <p>1 Q. About the time it came out?</p> <p>2 A. I don't know. I can't --</p> <p>3 Q. Do you remember any details of it?</p> <p>4 A. No.</p> <p>5 Q. Okay. You have -- the next thing</p> <p>6 you have here is, quote, Attorney General plans to</p> <p>7 strike down Voting R Act. I assume R there stands</p> <p>8 for Rights Act.</p> <p>9 A. Uh-huh (Nodding head).</p> <p>10 Q. Explain what you meant in your</p> <p>11 notes.</p> <p>12 And there are some words under that.</p> <p>13 Judgment again. That may be related to that, I</p> <p>14 don't know. Just tell us, please.</p> <p>15 A. Okay. What I was saying here was I</p> <p>16 was remembering that the Attorney General plans to</p> <p>17 strike down what they -- the courts had agreed with</p> <p>18 or gone with in that. That's it.</p> <p>19 Q. And what is the basis for your</p> <p>20 understanding that the Attorney General has asked</p> <p>21 this court to strike down the --</p> <p>22 A. Something that I have read.</p> <p>23 Q. Just something that you read?</p>

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<p style="text-align: right;">Page 49</p> <p>1 A. Yeah.</p> <p>2 Q. You can't tell me what it was?</p> <p>3 A. I couldn't recall where it was or</p> <p>4 what it was.</p> <p>5 Q. And next you have got, "Violation</p> <p>6 dilutes. Intentionally discriminatory weakens."</p> <p>7 Do you have any evidence that the</p> <p>8 Alabama Legislature acted with discriminatory</p> <p>9 intent when it passed the 2023 Congressional</p> <p>10 Districts?</p> <p>11 A. No.</p> <p>12 Q. Okay. Do you have any evidence that</p> <p>13 it acted with discriminatory intent when it passed</p> <p>14 the 2021 Congressional Districts?</p> <p>15 A. No.</p> <p>16 Q. Fine.</p> <p>17 You have got, "Segregate by race</p> <p>18 prevents multi-racial." And I'm going to assume</p> <p>19 that meant multi-racial crossover voting coalitions</p> <p>20 because that's generally the language used in the</p> <p>21 complaint.</p> <p>22 Is that what you are referring to</p> <p>23 there?</p>	<p style="text-align: right;">Page 51</p> <p>1 anything specific.</p> <p>2 But when you read something and you</p> <p>3 see -- you tried to understand what you read, you</p> <p>4 don't know for sure if this is this. But you do</p> <p>5 know if it's in a document that you read, you</p> <p>6 assume -- you know, you assume that's it true.</p> <p>7 And --</p> <p>8 Q. I understand.</p> <p>9 A. And, to my knowledge, that -- yes.</p> <p>10 Q. And is it fair to say that you have</p> <p>11 read something in this case about voters being</p> <p>12 segregated by race and the prevention of the</p> <p>13 forming of multi-racial coalitions, but you can't</p> <p>14 tell me anything more about it right now?</p> <p>15 A. Yes.</p> <p>16 Q. Okay. I think that covers that.</p> <p>17 Did you add anything to your notes</p> <p>18 after we made a copy of it?</p> <p>19 Is there anything I haven't asked</p> <p>20 you about?</p> <p>21 A. No.</p> <p>22 Q. Okay. I think we are done with</p> <p>23 that.</p>
<p style="text-align: right;">Page 50</p> <p>1 A. Well, yes.</p> <p>2 Q. Is that your complaint about the</p> <p>3 2023 Congressional Districts passed by the Alabama</p> <p>4 Legislature, that they segregate voters by race and</p> <p>5 prevent the formation of multi-racial coalitions?</p> <p>6 A. Yes. And can I --</p> <p>7 Q. Sure.</p> <p>8 A. Based on -- I'm not an attorney. I</p> <p>9 don't know the laws or whatever, but I know what I</p> <p>10 hear.</p> <p>11 Q. Okay.</p> <p>12 A. And I do know what I have seen. And</p> <p>13 when I say I have seen, I have seen voters or</p> <p>14 personnel -- black voters or even white voters -- I</p> <p>15 have seen that there is -- it seems as if there are</p> <p>16 lines and they were not able to -- how can I say</p> <p>17 this -- there is a racial divide there.</p> <p>18 Q. Yes, sir.</p> <p>19 A. Yes. That's what -- that's what I'm</p> <p>20 speaking of.</p> <p>21 Q. Are you talking about a specific</p> <p>22 racial divide?</p> <p>23 A. Well, I can't -- I can't name</p>	<p style="text-align: right;">Page 52</p> <p>1 You come into -- you come into a</p> <p>2 deposition, Reverend Andrews, with a game plan for</p> <p>3 how you are going to do everything, and not long</p> <p>4 after that it falls apart and your order is not the</p> <p>5 order that you thought you were going to take</p> <p>6 things in. And that's already happened here, which</p> <p>7 is expected.</p> <p>8 Let's go back and sort of cover some</p> <p>9 other things that were preliminary and then we will</p> <p>10 -- I think our conversation we just had may have</p> <p>11 shortened your deposition by a good amount.</p> <p>12 But I want to go back to some --</p> <p>13 well, let me ask one question.</p> <p>14 You mentioned that you had a</p> <p>15 telephone conversation to prepare for this -- and</p> <p>16 you may have had some in-person meetings, you can't</p> <p>17 really recall to prepare for this.</p> <p>18 Do you have any written notes of</p> <p>19 those meetings?</p> <p>20 A. No.</p> <p>21 Q. What is your date of birth, if I may</p> <p>22 ask, sir?</p> <p>23 A. 2/9/1956. February the 9th, 1956.</p>

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<p style="text-align: right;">Page 53</p> <p>1 Q. I've got you beat by two months. 2 What is your residential address? 3 A. 3749 Fieldcrest Drive, Montgomery, 4 Alabama 36111. 5 Q. Is that your full-time residential 6 address? 7 A. Yes. 8 Q. Do you know which Congressional 9 District that address is in under the remedial plan 10 entered by the Federal Court? 11 A. I think it's two -- I think it's 12 two, if I'm not mistaken. 13 Q. Do you have any other residential 14 property? 15 A. No. 16 Q. You claim the Fieldcrest residence 17 as your residence? 18 A. Yes. 19 Q. Do you have an email account? 20 A. Yes. 21 Q. Could I ask what that is. 22 A. It's Kate, K-A-T-E, 5636106 @ 23 Yahoo.com.</p>	<p style="text-align: right;">Page 55</p> <p>1 Q. -- related to your church? 2 A. Yes. 3 Q. Okay. Let's go back and now talk 4 about something that we talked about briefly. 5 You said that you were in a 6 deposition about -- in a case about something that 7 happened at work. 8 A. Yes. 9 Q. Just, briefly, what was that about? 10 A. It was a lawsuit filed that a kid 11 was hurt while he was in the -- I worked for the 12 Montgomery County Juvenile Court. So that's where 13 it was. It was a court case. And it -- that was 14 basically it. 15 Q. Was it a Workers' Comp-type claim -- 16 a work injury? 17 A. No. This was a -- 18 Q. A detainee? 19 A. Right. 20 Q. Okay. I understand. 21 Somebody being detained by the 22 juvenile court system -- in the juvenile court 23 system had been injured in the course of being</p>
<p style="text-align: right;">Page 54</p> <p>1 Q. Do you share that with your wife or 2 some other person? 3 I'm just -- I say that because of 4 the Kate, K-A-T-E. 5 A. That was my mother's middle name. 6 Q. So you just named your email account 7 that? 8 A. Yes. 9 Q. Do you have any social media 10 accounts? 11 Do you -- let me ask. Do you have 12 an Instagram account? 13 A. I think I do. 14 Q. But you don't use it? 15 A. I -- I use accounts -- social media. 16 I know I have a Facebook account, but I don't -- 17 don't know much of that stuff because all I do is 18 post something religious or whatever on there. 19 Q. Have you ever posted anything about 20 this case or about Voting Rights? 21 A. Oh, no. 22 Q. It's just religious stuff -- 23 A. Yes.</p>	<p style="text-align: right;">Page 56</p> <p>1 detained and the lawsuit was about that; is that 2 correct? 3 A. Yes. 4 Q. Okay. Do you still work for the 5 Montgomery County Juvenile Court? 6 A. No. 7 Q. We will get to your employment in 8 just a second -- well, let's cover it now. 9 You are the pastor of what you have 10 identified as a family church. I can't read my bad 11 handwriting. The name is Mount -- 12 A. Mountainview. 13 Q. Mountainview Baptist Church? 14 A. Yes. 15 Q. In Bullock County? 16 A. Uh-huh (Nodding head). 17 Q. How long have you been the pastor 18 there? 19 A. I think it's like -- I went there in 20 2001, I think. 21 Q. You indicated that's a small church. 22 A. Yes. 23 Q. About fifty, a hundred?</p>

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<p style="text-align: right;">Page 57</p> <p>1 A. Oh, no. No, no. It's -- well, 2 right now it's -- we are talking about one, two -- 3 three actual members. 4 And what happens in those kind of 5 situations is people from other churches -- they 6 fellowship with me because they steal one Sunday 7 some two Sundays -- 8 Q. I understand. 9 A. -- or whatever, yeah. 10 Q. In addition to being a pastor at 11 Mountainview Church do you have any other 12 employment? 13 A. No. I'm -- I'm retired. 14 Q. You are retired? 15 A. Yes. 16 Q. Did you retire from the Montgomery 17 County Juvenile Court System? 18 A. Yes. 19 Q. How long did you work in the 20 Montgomery County Juvenile Court System? 21 A. I think from -- I started there in 22 '85 or '87. 23 Q. Okay.</p>	<p style="text-align: right;">Page 59</p> <p>1 Q. Okay. 2 A. Could I add something? 3 Q. Yes, sir. 4 A. You said employment, but it's not 5 really employment because I don't get paid. 6 Q. You don't get paid. 7 Can you tell me how you became a 8 plaintiff in this lawsuit, Reverend Andrews. 9 A. I don't remember. I got a call from 10 -- I done forgot who it was now. But I got a call 11 from somebody and they said that I would be a good 12 person. 13 And they explained what was going on 14 as far as what I have said here today, that it was 15 -- it wasn't fair what the courts were doing. And 16 I felt that with, you know, being around -- I 17 wanted to be a part of anything that would help the 18 people. 19 Q. Sure. 20 A. So that was -- that was why. 21 Q. Do you recall if the person who 22 called you was a friend or were they a lawyer or 23 were they a member of some organization like the</p>
<p style="text-align: right;">Page 58</p> <p>1 A. To 2012. I got hurt -- disabled to 2 work. 3 Q. And what generally was -- if you 4 will, generally describe your duties at the time 5 you left the Montgomery County Juvenile Court 6 System. 7 A. I was the volunteer Chaplain. I 8 organized different programs for the detainees that 9 was there. I was on record as a -- the position 10 was called a Detention Officer. 11 So what I did was I processed 12 whatever intake was sent through -- I processed the 13 individuals and made sure that they were kept safe 14 while they were there. 15 Q. If I understood you correctly, you 16 suffered an injury in 2012 that -- 17 A. Yes. 18 Q. And you retired as a result of that? 19 A. Yes. 20 Q. Okay. Have you had any employment 21 other than as the pastor of Mountain View Baptist 22 Church since 2012? 23 A. No.</p>	<p style="text-align: right;">Page 60</p> <p>1 NAACP or the ACLU or do you know? 2 A. I don't know what organization they 3 are a member of, and I don't really recall who 4 called me. But it had to be somebody that knowed 5 me, though. 6 Q. Was it back in 2021 when the lawsuit 7 was filed? 8 A. I believe so. I'm not for sure, 9 because I can't say if I remember when the lawsuit 10 was filed. 11 Q. Well, I have got right here document 12 one in this case, which is dated 9/27/2021, which 13 is the original complaint. And it has your name on 14 it. I will just show it to you. 15 A. Okay. Well, that's when it was 16 then. 17 Q. So you would have been called 18 sometime before then, I guess -- 19 A. Yeah. 20 Q. -- to see if you wanted to 21 participate in the lawsuit? 22 A. Correct. 23 Q. Do you recall what happened next?</p>

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<p style="text-align: right;">Page 61</p> <p>1 A. No, I don't.</p> <p>2 Q. Okay. Do you recall seeing -- this</p> <p>3 document, which is the document that officially</p> <p>4 commences a lawsuit, is called a complaint.</p> <p>5 Do you recall seeing this -- this</p> <p>6 initial complaint that was filed in September of</p> <p>7 2021?</p> <p>8 A. I had to have glanced at it, yeah.</p> <p>9 Q. But no specific memory?</p> <p>10 A. No.</p> <p>11 Q. There was a Second Amended Complaint</p> <p>12 which I have right here -- excuse me. There was an</p> <p>13 amended complaint which I have right here, document</p> <p>14 fifteen in this case, which was filed on November</p> <p>15 the 4th, 2021, shortly after the original</p> <p>16 complaint, and you are also listed on that.</p> <p>17 Do you recall reviewing the amended</p> <p>18 complaint before it was filed?</p> <p>19 A. I probably had to. I don't know for</p> <p>20 sure. I don't remember. I really don't.</p> <p>21 Q. That's fine. I promise you I don't</p> <p>22 know what I did in 2021. I cannot remember.</p> <p>23 Do you recall seeing what's now --</p>	<p style="text-align: right;">Page 63</p> <p>1 Do you recall what happened in that</p> <p>2 initial contact?</p> <p>3 A. I don't recall.</p> <p>4 Q. Was that initial contact a call more</p> <p>5 or less out of the blue or were you at a meeting</p> <p>6 with some people and someone suggested something to</p> <p>7 you or was it a letter or correspondence of some</p> <p>8 sort?</p> <p>9 A. It was a call out of the blue.</p> <p>10 Q. Just out of the blue?</p> <p>11 A. Yeah.</p> <p>12 Q. Why do you think they called you?</p> <p>13 A. I don't know.</p> <p>14 Q. Okay. What have you done since you</p> <p>15 were originally called as a plaintiff in this</p> <p>16 lawsuit, if you know?</p> <p>17 When I say what have you done, have</p> <p>18 you met with lawyers?</p> <p>19 Have you met with other plaintiffs?</p> <p>20 Have you -- I think we have covered</p> <p>21 your review of the complaint.</p> <p>22 Have you looked at other documents,</p> <p>23 have you gone to meetings, anything like that?</p>
<p style="text-align: right;">Page 62</p> <p>1 the operative complaint in this case is the second</p> <p>2 amended complaint. And that's document two two</p> <p>3 nine in this case. And it was filed on October the</p> <p>4 13th of 2020 -- excuse me. I looking at it upside</p> <p>5 down. It's January the 31st of 2024.</p> <p>6 Do you recall seeing the second</p> <p>7 amended complaint?</p> <p>8 A. I -- I have -- probably have seen</p> <p>9 it, but -- I can't say -- I don't know if I even</p> <p>10 really read through it or whatever.</p> <p>11 Q. That's fair enough.</p> <p>12 Would it be fair to say that you</p> <p>13 could not answer any questions about the changes in</p> <p>14 the claims made from the initial complaint to the</p> <p>15 Second Amended Complaint?</p> <p>16 A. Yes, you are correct.</p> <p>17 Q. All right. After you were contacted</p> <p>18 to become -- after you were contacted -- what were</p> <p>19 you asked?</p> <p>20 Were you asked, "Hey, do you want to</p> <p>21 be a plaintiff in this lawsuit," or, "Do you want</p> <p>22 to come to a meeting and talk about Congressional</p> <p>23 redistricting," or something else?</p>	<p style="text-align: right;">Page 64</p> <p>1 A. I haven't gone to any meetings.</p> <p>2 Q. Have you met with any of the other</p> <p>3 plaintiffs?</p> <p>4 A. As far as the lawsuit?</p> <p>5 Q. Yes, sir.</p> <p>6 A. No, I haven't met with them.</p> <p>7 Q. Have you met with them about</p> <p>8 anything else?</p> <p>9 A. Yeah. Well, one of the</p> <p>10 plaintiffs -- we pastor in the same county, so --</p> <p>11 Q. That would be the Reverend Andrew</p> <p>12 Walker?</p> <p>13 A. Yes.</p> <p>14 Q. You know the Reverend Walker?</p> <p>15 A. Yes.</p> <p>16 Q. So you and he meet about pastoring</p> <p>17 things from time to time?</p> <p>18 A. Yes.</p> <p>19 Q. Okay. At those meetings have you</p> <p>20 and he discussed this lawsuit or Congressional</p> <p>21 redistricting?</p> <p>22 A. Not that I recall.</p> <p>23 Q. Have you had any conversations with</p>

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<p style="text-align: right;">Page 65</p> <p>1 Bobby Singleton or Roger Smitherman or Eddie 2 Billingsly or Leonette Slay about Congressional 3 redistricting or this lawsuit that you can recall? 4 A. No. 5 Q. Have you ever held public office, 6 Reverend Andrews? 7 A. No. 8 Q. You say that like I have asked you 9 if you have ever had a bad illness. 10 A. Worse. 11 Q. I feel the same way. 12 Have you ever helped somebody get 13 elected? 14 A. Help as in helping with the 15 campaign? 16 Q. Yes, sir. 17 A. Yes, sir. 18 Q. All right. 19 A. Many. 20 Q. Who? 21 Tell me about -- tell us about that, 22 please, if you will. 23 A. Well, it started out when I was a</p>	<p style="text-align: right;">Page 67</p> <p>1 to the workers or whatever. Whatever I could do, 2 that was one of the things that I could do. 3 Whatever I did to help out, yeah. 4 Q. Do you identify as a Republican or 5 Democrat or some other party? 6 A. I don't. I'm -- I don't just tie 7 myself down. 8 Q. Do you think of yourself as an 9 independent or -- 10 A. No. I'm -- I'm just a black voter. 11 Q. Okay. That's fair enough. 12 Have you ever voted for a Republican 13 that you can recall? 14 A. I think so. I don't recall who it 15 was, but I do -- this was before they -- you 16 couldn't change over. 17 Q. Before the crossover? 18 A. Yeah. 19 Q. It was awhile ago. 20 A. Yeah. 21 Q. Okay. Do you recall whether or not 22 in the last ten years you have voted for a 23 Republican?</p>
<p style="text-align: right;">Page 66</p> <p>1 young boy growing you up in Bullock County. I -- 2 when Thomas Reed and Fred Gray first -- you know, 3 they were starting out and I helped deliver 4 ballots -- you know, you had the sample ballots or 5 whatever -- to different places. 6 Q. That was information -- was he a 7 member of the House or the Senate? 8 A. House. 9 Q. Anybody else? That was a long time 10 ago. 11 A. Yeah. Well, since then the MCDC was 12 with John Knight when they were up and going. Like 13 I say, that was back in the -- in the '90s or 14 whatever. 15 Q. Well, have you ever -- have you 16 helped anybody get elected in the last ten years in 17 any material way? 18 A. Tracy Larkin when he was alive. 19 That was my wife's uncle, yeah. 20 Q. Okay. What did you do for Mr. 21 Larkin? 22 A. Well, we got people to the pole to 23 vote. Took food, water to the polling -- you know,</p>	<p style="text-align: right;">Page 68</p> <p>1 A. No, I don't think so. 2 Q. In the last ten years, when you have 3 voted in a partisan election in Alabama, has it 4 been for the Democratic candidate or somebody 5 running in the Democratic primary? 6 A. Yes. 7 Q. Did you have any experience with 8 redistricting before you became a plaintiff in this 9 lawsuit? 10 A. No. 11 Q. Did you attend any of the meetings 12 that the reapportionment committee helped -- the 13 public hearings they had around the State before 14 they -- 15 A. No. 16 Q. -- wait. I'm sorry. 17 Did you attend any of the public 18 hearings that the reapportionment committee held 19 around the State before the special session in 20 which they did redistricting in 2021? 21 A. No. 22 Q. I know it's a small thing, but I 23 promise you when it gets printed out it makes it so</p>

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<p style="text-align: right;">Page 69</p> <p>1 much easier.</p> <p>2 Do you understand that redistricting</p> <p>3 occurs after each decennial census?</p> <p>4 We get the census -- the census is</p> <p>5 done every like 2000, 2010, 2020, and the next one</p> <p>6 will be 2030. I just got an email from the Census</p> <p>7 Bureau they are starting to work on the 2030 census</p> <p>8 right now.</p> <p>9 Do you understand like every ten</p> <p>10 years the Federal Government does a census of the</p> <p>11 country?</p> <p>12 A. I didn't know that.</p> <p>13 Q. You didn't know that.</p> <p>14 Do you know that redistricting is</p> <p>15 related the delivery of the new census data?</p> <p>16 A. No.</p> <p>17 Q. Do you know what the purpose of</p> <p>18 redistricting is -- why we do it?</p> <p>19 A. No.</p> <p>20 Q. Have you made any public</p> <p>21 statements -- other than being a plaintiff in this</p> <p>22 lawsuit, Reverend Andrews, have you made any public</p> <p>23 statements about redistricting that you can recall?</p>	<p style="text-align: right;">Page 71</p> <p>1 one Voting Rights claim, that you would not be able</p> <p>2 to do that?</p> <p>3 A. That's right, I wouldn't.</p> <p>4 Q. Assume that after a trial the</p> <p>5 Singleton plaintiffs prevail on at least one of</p> <p>6 those claims. Do you know what, as a plaintiff,</p> <p>7 you would be asking the court to do or are you</p> <p>8 going to leave that to your attorneys?</p> <p>9 A. Leave it to the attorneys.</p> <p>10 Q. Okay. Fair enough.</p> <p>11 I would like to ask you some</p> <p>12 questions -- I think we may be getting to the end</p> <p>13 of your deposition -- about what you expect to</p> <p>14 testify to at trial.</p> <p>15 And if -- if you tell me, "I'm going</p> <p>16 to testify about that," then I will ask you</p> <p>17 questions about it.</p> <p>18 But if you tell me, "I don't have</p> <p>19 any plans to testify about that," or, "I don't know</p> <p>20 anything about that," I won't ask you questions</p> <p>21 about it.</p> <p>22 But if you -- if you do testify at</p> <p>23 trial we will object to that because I wasn't able</p>
<p style="text-align: right;">Page 70</p> <p>1 A. No.</p> <p>2 Q. Do you know if as a plaintiff in</p> <p>3 this lawsuit you're asking the court to enter --</p> <p>4 should you prevail -- a specific plan such as the</p> <p>5 Singleton Plan or the Smitherman Plan or the CDC</p> <p>6 Plan or any other plan?</p> <p>7 Do you have any knowledge of that</p> <p>8 one way or the other?</p> <p>9 A. Are you asking me do I know</p> <p>10 specifically what plan that I agree with or what --</p> <p>11 Q. Let me rephrase the question.</p> <p>12 A. Okay.</p> <p>13 Q. Thank you for that.</p> <p>14 There are three counts to this</p> <p>15 Singleton complaint; two brought under the</p> <p>16 Constitution and one brought under the Voting</p> <p>17 Rights Act.</p> <p>18 Are you aware of that? I mean,</p> <p>19 that's kind of down in the details. Do you know</p> <p>20 that or not?</p> <p>21 A. No, I don't.</p> <p>22 Q. I'm guessing if I asked you to</p> <p>23 explain to me the two Congressional claims and the</p>	<p style="text-align: right;">Page 72</p> <p>1 to ask you question about it.</p> <p>2 Is that fair?</p> <p>3 Do you understand me?</p> <p>4 A. Yes.</p> <p>5 Q. Are you going to testify -- do you</p> <p>6 plan to testify about either the Singleton or the</p> <p>7 Smitherman Plans that were introduced in the 2023</p> <p>8 Special Legislative Session?</p> <p>9 A. Planned -- I am -- I haven't</p> <p>10 planned on doing anything. I go step by the</p> <p>11 step -- this is the first thing, you asked me some</p> <p>12 questions. So I don't know what is going to</p> <p>13 happen, you know. So I can't plan anything.</p> <p>14 Q. Do you know -- has anyone talked to</p> <p>15 you about testifying about those plans?</p> <p>16 A. No.</p> <p>17 Q. Okay. Do you know anything about</p> <p>18 either the Smitherman Plan or the Singleton Plan?</p> <p>19 A. No more than what I told you</p> <p>20 earlier --</p> <p>21 Q. Okay.</p> <p>22 A. -- no.</p> <p>23 Q. Do you know -- have you been asked</p>

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<p style="text-align: right;">Page 73</p> <p>1 to testify about the 2023 enacted plan, Ala Act</p> <p>2 2023-563?</p> <p>3 A. I don't know what it is, no.</p> <p>4 Q. Do you know anything -- or have you</p> <p>5 been asked to testify about the court ordered 2023</p> <p>6 Congressional Plan?</p> <p>7 A. No.</p> <p>8 Q. Are you going to testify about how</p> <p>9 any of the plans we have talked about comply or</p> <p>10 don't comply with the Constitution or the Voting</p> <p>11 Rights Act?</p> <p>12 A. I don't know.</p> <p>13 Q. Okay. Are you going to -- I think</p> <p>14 we have covered that.</p> <p>15 Are you going to testify about</p> <p>16 various case law such as Cooper v. Harris; what it</p> <p>17 means and how it applies to this case?</p> <p>18 A. No.</p> <p>19 Q. Are you going to testify about</p> <p>20 whether the State is required to draw influence or</p> <p>21 crossover districts in order to comply with the US</p> <p>22 Constitution or the Voting Rights Act?</p> <p>23 A. No plans.</p>	<p style="text-align: right;">Page 75</p> <p>1 to ask you. One of the other attorneys may have</p> <p>2 questions for you.</p> <p>3 (Pause)</p> <p>4 MR. DAVIS: Jim Davis. I do not</p> <p>5 have any questions. Thank you.</p> <p>6 MR. PENN: We don't have any</p> <p>7 questions.</p> <p>8 I was waiting to see if there are</p> <p>9 any other attorneys online that might.</p> <p>10 MS. SADASIVAN: Milligan plaintiffs</p> <p>11 also don't have any questions.</p> <p>12 MR. WALKER: Anyone else who might</p> <p>13 have any questions please speak up.</p> <p>14 (Pause)</p> <p>15 MR. WALKER: All Right. Reverend</p> <p>16 Andrew, thank you for coming in today and have a</p> <p>17 good rest of your day.</p> <p>18 THE WITNESS: Thank you.</p> <p>19 MR. WALKER: The deposition is</p> <p>20 terminated.</p> <p>21</p> <p>22</p> <p>23 (Deposition concluded at 10:31 AM)</p>
<p style="text-align: right;">Page 74</p> <p>1 Q. Are you going to offer testimony</p> <p>2 that you know of in support of the Caster or</p> <p>3 Milligan Plans, the plaintiffs in the other two</p> <p>4 Congressional lawsuits?</p> <p>5 A. No plans.</p> <p>6 Q. Just yourself, what do you want the</p> <p>7 court to do in terms of a remedial plan if you</p> <p>8 prevail on any of your claims? Maybe that's been</p> <p>9 asked and answered.</p> <p>10 I think you said you were going to</p> <p>11 leave it up to your attorneys. We will move on</p> <p>12 from that.</p> <p>13 MR. WALKER: Can we take a break?</p> <p>14 MR. PENN: Sure.</p> <p>15</p> <p>16 10:15 AM</p> <p>17 (SHORT RECESS)</p> <p>18 10:30 AM</p> <p>19</p> <p>20 MR. WALKER: Reverend Andrews, we</p> <p>21 are back on the record. And thank you for that</p> <p>22 little break.</p> <p>23 I do not have any further questions</p>	<p style="text-align: right;">Page 76</p> <p>1 CERTIFICATE</p> <p>2 I hereby certify that the above and</p> <p>3 foregoing deposition of REVEREND DARRYL ANDREWS was</p> <p>4 taken down by me in stenotype and the questions and</p> <p>5 answers thereto were transcribed by means of</p> <p>6 computer-aided transcription given by said witness</p> <p>7 upon said deposition.</p> <p>8 I further certify that I am neither of</p> <p>9 counsel, nor of kin to the parties to the action,</p> <p>10 nor am I in anywise interested in the result of</p> <p>11 said cause.</p> <p>12 I further certify that I am duly licensed</p> <p>13 by the Alabama, Georgia, and Tennessee Boards of</p> <p>14 Court Reporting as a Certified Court Reporter as</p> <p>15 evidenced by the numbers following my name found</p> <p>16 below.</p> <p>17</p> <p>18 DAVID L. MILLER, CCR, RPR, RMR</p> <p>19</p> <p>20 Alabama #347; expires 9/30/2024</p> <p>21 Georgia #6322-0018-0740-915; expires 4/1/2025</p> <p>22 Commissioner for the State of Alabama at Large.</p> <p>23 My Commission Expires 1/10/2026</p>

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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. DARRYL ANDREWS

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. Darryl Andrews**, before an officer authorized to administer oaths on **Tuesday, July 11, 2024, at 9:00 a.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

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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***

VOTING RIGHTS ACT

CONSTITUTION

↓

BLACK VOTERS PROVIDE EQUAL OPPORTUNITY

PRELIMINARY

JUDGMENT

VOTING RIGHTS ACT ORDERED 2024

ATTORNEY GENERAL PLANS TO STRIKE DOWN VOTING R ACT

JUDGMENT AGAIN

- VIOLATION DILUTES
INTENTIONALLY DISCRIMINATORY WEAKERS

SEGREGATES BY RACE PREVENTS MULTI RACIAL

NO EARLY VOTING

PROJECT 2025
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