

EXHIBIT 24

In the Matter Of:
HODGES V. PASSIDOMO

8:24-cv-879

KETO NORD HODGES

November 26, 2024



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IN THE UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF FLORIDA
TAMPA DIVISION

KETO NORD HODGES, et al.,
Plaintiffs,

v.

Case No.: 8:24-cv-879

KATHLEEN PASSIDOMO, et al.,
Defendants.

_____ /

VIDEOCONFERENCE DEPOSITION OF KETO NORD HODGES

TAKEN ON BEHALF OF THE DEFENDANT

DATE TAKEN: November 26, 2024

TIME: 2:09 p.m. - 3:49 p.m.

LOCATION: Via Zoom Videoconference

Examination of the witness taken before:

Wendy E. Rivera, FPR

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APPEARANCES OF COUNSEL
(Via Videoconference)

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1 say, quote, Legislators and their staff purportedly drew
2 these districts in a race-predominant manner, end quote.

3 So my first question was going to be, what --
4 do you have any particular facts regarding the racial
5 motivations of the legislature in drawing the district
6 lines?

7 A. No. I don't have any particular facts. I
8 would have to defer to my attorneys regarding that
9 discussion, but looking at the maps visually, I can't
10 see another reason why you would -- why someone or an
11 entity would divide up the voting district that way
12 especially considering you have two -- it's one of the
13 few if not the only district in the area where you have
14 to cross a body of water and possibly multiple counties.

15 Q. And who is it that you believe is harmed by
16 the way that district lines are currently drawn?

17 A. I believe primarily African-American voters
18 living in South St. Pete and Hillsborough County are
19 harmed by the redrawing of this district.

20 Q. And how are the Black voters in South St. Pete
21 and Hillsborough County harmed by the way the districts
22 are drawn?

23 A. Voters in both areas are harmed because they
24 are -- they previously had multiple political
25 representatives and now that number has been

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1 Q. Okay. All right. Let's look at paragraph 97.

2 A. Okay. Let me read it. Okay. Go ahead.

3 Q. Just focussing on the first line that refers
4 to, quote, The direct evidence of racial predominance,
5 what direct evidence are you aware of that race
6 predominates the drawing of the district lines you're
7 challenging?

8 A. I'm not certain on all of the particular
9 factors, so I would have to defer to my attorneys for
10 more complete answering of this.

11 Q. But do you know of any direct evidence that
12 race predominates the drawing of the lines?

13 A. I'm not sure at this time, but I can't see why
14 else you would need to draw a district in this way.

15 Q. Looking at paragraph 131 -- take a minute to
16 read that and let me know, please.

17 A. Yes. You can go ahead.

18 Q. Okay. Do you know what the phrase Tier One
19 compliance means in that allegation?

20 A. I don't recall. I've seen the definition
21 somewhere in my reading of this lawsuit, I believe, but
22 I'd have to refer to -- or defer to my attorneys for
23 more definitions or knowledge.

24 Q. Let's look at the map of what's called plan
25 42, which is in your complaint. There it is.