

In the Matter Of:
HODGES vs PASSIDOMO

8:24-cv-879

MEIKO SEYMOUR

November 26, 2024

Exhibit 24



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MEIKO SEYMOUR
HODGES vs PASSIDOMO

November 26, 2024

1

1 IN THE UNITED STATES DISTRICT COURT
2 MIDDLE DISTRICT OF FLORIDA
3 TAMPA DIVISION

4 KETO NORD HODGES, et al.,

5 Plaintiffs,

6 v.

Case No.: 8:24-cv-879

7 KATHLEEN PASSIDOMO, et al.,

8 Defendants.

9 _____/

10
11
12 VIDEOCONFERENCE DEPOSITION OF MEIKO SEYMOUR

13 TAKEN ON BEHALF OF THE DEFENDANT

14 DATE TAKEN: November 26, 2024

15 TIME: 10:14 a.m. - 11:45 a.m.

16 LOCATION: Via Zoom Videoconference

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20
21
22 Examination of the witness taken before:

23 Wendy E. Rivera, FPR

MEIKO SEYMOUR
HODGES vs PASSIDOMO

November 26, 2024

2

APPEARANCES OF COUNSEL
(Via Videoconference)

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MEIKO SEYMOUR
HODGES vs PASSIDOMO

November 26, 2024

3

I N D E X O F E X A M I N A T I O N

WITNESS: MEIKO SEYMOUR

PAGE

Direct Examination by Ms. Harle

4

Certificate of Oath

47

Certificate of Reporter

48

Errata (to be forwarded upon execution)

49

D E F E N D A N T ' S E X H I B I T S

EXHIBIT NO.

DESCRIPTION

PAGE

Exhibit 1

Complaint

22

Exhibit 2

Plaintiff's Rule 26
Initial Disclosures

43

MEIKO SEYMOUR
HODGES vs PASSIDOMO

November 26, 2024

4

1 VIDEOCONFERENCE DEPOSITION OF MEIKO SEYMOUR

2 November 26, 2024

3 - - -

4 MEIKO SEYMOUR,

5 having been first duly sworn and responding "Yes,"
6 testifies as follows:

7 DIRECT EXAMINATION

8 BY MS. HARLE:

9 Q. Good morning, Mr. Seymour. My name is Denise
10 Harle. I'm one of the attorneys for the Florida Senate
11 in this case and I'll be taking your deposition today.

12 A. Good morning.

13 Q. Could you please state and spell your name for
14 the record.

15 A. Meiko Seymour, M-e-i-k-o, S-e-y-m-o-u-r.

16 Q. Thank you. Were you able to observe some of
17 the depositions of your co-plaintiffs last week?

18 A. Yes.

19 Q. Okay. Great. Well, this will sound very
20 familiar to you then.

21 Have you been deposed before?

22 A. I have not.

23 Q. Do you understand that you're under oath and
24 your testimony today has the same significance as if you
25 were in court?

MEIKO SEYMOUR
HODGES vs PASSIDOMO

November 26, 2024

5

1 A. Yes.

2 Q. We -- you're doing a great job so far, but
3 just a few things we need to keep in mind are that you
4 speak clearly, give complete answers, and try not to
5 interrupt when I'm talking.

6 Does that make sense?

7 A. Yes.

8 Q. Okay. Also, you need to answer your question
9 -- each question even if your attorney objects unless
10 your attorney instructs you not to answer. If you need
11 a break at any time, please let me know and we can do
12 that.

13 Is there anything preventing you from giving
14 truthful testimony today?

15 A. Such as?

16 Q. Such as a medical condition, taking drugs or
17 medications, feeling ill or unable to think clearly.

18 A. No, ma'am.

19 Q. Anything else that would keep you from being
20 truthful today in your testimony?

21 A. No, ma'am.

22 Q. Okay. What did you do to prepare for your
23 deposition today?

24 A. Can you define prepare?

25 Q. Sure. In advance of your deposition today,

MEIKO SEYMOUR
HODGES vs PASSIDOMO

November 26, 2024

6

1 did you take any actions like have any conversations,
2 any meetings, review any documents, anything at all that
3 -- with an eye toward today to prepare yourself for
4 sitting for deposition today?

5 A. Other than prepping with my attorney, no.

6 Q. And is your attorney Ms. Robertson?

7 A. She is one of my attorneys.

8 Q. Okay. And how long did you prep with your
9 attorneys for?

10 A. A few hours.

11 Q. Did you review -- did you review any documents
12 in preparation for your deposition today?

13 MS. ROBERTSON: Object to form.

14 THE WITNESS: Only during our prep time
15 together.

16 BY MS. HARLE:

17 Q. Can you please state your address, your
18 current residence?

19 A. 824 10th Avenue South, St. Petersburg, Florida
20 33701.

21 Q. And when did you move there?

22 A. July 2022, I believe.

23 Q. Is that an apartment or a house?

24 A. It's a house.

25 Q. And do you own it?

MEIKO SEYMOUR
HODGES vs PASSIDOMO

November 26, 2024

7

1 A. I do not.

2 Q. And I apologize. I have a very froggy voice
3 today, so just let me know if I'm got coming through
4 clearly.

5 Where did you live before you moved to 824
6 10th Avenue South?

7 A. In St. Pete.

8 Q. Okay. What was your street address prior?

9 A. 441 33rd Street North. I believe my ZIP code
10 was 33712.

11 Q. And do you know where that address falls on
12 the maps that you're currently challenging, whether it's
13 in the District 16 where you are now or in District 18?

14 A. I can't recall right now.

15 Q. And when did you move to 441 3rd Street North?

16 A. I believe it was sometime in 2017, 2018.

17 Q. Is there any chance you're aware of that you
18 might be moving in the next year or two?

19 A. Can you repeat the question?

20 Q. Sure. Is there any chance that you're aware
21 of that you might be moving in the next year or two?

22 A. No.

23 Q. Have you ever had an address on your driver's
24 license that was different from your residential
25 address?

MEIKO SEYMOUR
HODGES vs PASSIDOMO

November 26, 2024

8

1 A. Can you repeat the question?

2 Q. Sure. Have you ever had an address on your
3 driver's license that was different from your
4 residential address?

5 A. I'm sure at one point or another during moves
6 perhaps that has occurred.

7 Q. Would that just have been however long it took
8 you to get to the DMV, that sort of thing?

9 A. Perhaps.

10 Q. I can relate to that.
11 What's your educational background since high
12 school?

13 A. I am currently pursuing a master's degree.

14 Q. In what field?

15 A. Theology.

16 Q. And is that an online program or in person?

17 A. It is a mixture.

18 Q. Okay. What's the school?

19 A. Portland Seminary and Aldersgate School of
20 Ministry.

21 Q. Are those in Florida?

22 A. They are not.

23 Q. Okay. So you just have to sort of travel
24 every so often for classes? Or what does that look like
25 to be getting a degree from somewhere outside of

MEIKO SEYMOUR
HODGES vs PASSIDOMO

November 26, 2024

9

1 Florida?

2 A. Sorry. I heard two questions. Which one are
3 you asking?

4 Q. Yeah. Do you have to -- do you just travel to
5 take classes or -- I guess -- I guess that's the first
6 question.

7 A. They're -- the majority of the classwork is
8 online. The start and stop to semesters are in person.

9 Q. Okay. In person in what city?

10 A. Portland, Oregon.

11 Q. And when will you graduate?

12 A. 2027.

13 Q. So if you're pursuing your master's, I assume
14 -- do you already have your bachelor's?

15 A. I do not.

16 Q. Okay. And where did you obtain your
17 bachelor's degree?

18 A. I have not.

19 Q. Oh, you don't?

20 A. Correct.

21 Q. Okay. I'm sorry. I thought you said you do.
22 Okay.

23 So in the -- in your master's program, are you
24 receiving a bachelor's degree as part of the program?

25 A. It is taking as a part of the program some of

MEIKO SEYMOUR
HODGES vs PASSIDOMONovember 26, 2024
10

1 my previous college credits as well as work experience
2 to satisfy a bachelor's requirement.

3 Q. And where did you previously obtain your
4 college credits?

5 A. Valencia Community College and Southeastern
6 University or at the time, Southeastern Bible College.

7 Q. Is that in Lakeland?

8 A. Yes, ma'am.

9 Q. Okay. My uncle went there and my dad.

10 Who is your current employer?

11 A. Mission Igniter is the organization that I get
12 paid through.

13 Q. And what is your role at Mission Igniter?

14 A. I'm a church planter.

15 Q. And when did you start working at Mission
16 Igniter?

17 A. August 2024.

18 Q. So just describe for me in your own words what
19 it looks like to have the job duties of a church
20 planter.

21 A. Sure. That includes meeting with potential
22 supporters or donors. That includes meeting with
23 potential attendees of the church. It also includes
24 forming a team. It includes my degree program. It
25 includes training and certifications in church planting.

MEIKO SEYMOUR
HODGES vs PASSIDOMO

November 26, 2024

11

1 And there may be some others that I'm -- that aren't
2 coming to mind right now.

3 Q. Great. Is there, like, one particular church
4 that you're focussed on at the current moment? Or is it
5 -- do you have sort of a portfolio of churches?

6 A. Can you restate the question?

7 Q. Yes. Is it -- do you just sort of have one
8 church plant that you're focussed on at a time or do you
9 have a portfolio of churches that you're working on?

10 A. Focus on one church plant.

11 Q. And is there a particular church you're
12 focussed on right now?

13 A. Yes.

14 Q. And where is that church? Or does it not
15 exist?

16 A. Does not exist.

17 Q. Okay. Where does it -- where do you think
18 it's going to exist?

19 A. I do not know.

20 Q. Okay. So when you're speaking with I think
21 you said potential donors, potential attendees of the
22 church, if you don't know the geographic location, how
23 do you identify who those people are?

24 A. Define people.

25 Q. Well, I assume the potential attendees of the

MEIKO SEYMOUR
HODGES vs PASSIDOMO

November 26, 2024

12

1 church are people; is that right?

2 A. (Nonverbal response.)

3 Q. Okay. So are you currently working to
4 identify attendees for the church plant?

5 A. I am not.

6 Q. Okay. Would you know the name of the church
7 plant you're working on?

8 A. I do.

9 Q. Okay. What is the name of it?

10 A. Uncommon City -- excuse me --

11 Q. And --

12 A. -- Uncommon City --

13 Q. Uncommon City?

14 A. Uncommon City Church.

15 Q. City church. And is there a region --
16 particular geographic region you're looking at for
17 planting Uncommon City Church?

18 A. Not at this time.

19 Q. And when -- when Uncommon City Church is
20 planted, will you go there to sort of help get it up and
21 running for a while?

22 A. That depends on where it's planted, but I
23 imagine that is a possibility.

24 Q. Would you potentially be the lead pastor?

25 A. Yes.

MEIKO SEYMOUR
HODGES vs PASSIDOMO

November 26, 2024

13

1 Q. Great. Okay. So back on track here, before
2 August 2024, where were you working?

3 A. I lost the end of that.

4 Q. Where were you working before you became
5 employed with Mission Igniter in August 2024?

6 A. Novum Partners.

7 Q. And what does Novum Partners do?

8 A. They provide back-end administrative support
9 for ministries -- church ministries and ministers.

10 Q. What was your job title there?

11 A. Donor management specialist.

12 Q. And how long did you work at Novum Partners?

13 A. For several months.

14 Q. Before Novum Partners, where did you work?

15 A. Pinellas Community Church.

16 Q. What was your job title at Pinellas Community
17 Church?

18 A. I held several, executive pastor at the end.

19 Q. What years were you working at Pinellas
20 Community Church?

21 A. 2015 through 2023.

22 Q. Any particular reason you left Pinellas
23 Community Church?

24 A. No.

25 Q. Do you still attend there with your family?

MEIKO SEYMOUR
HODGES vs PASSIDOMO

November 26, 2024

14

1 A. I do not.

2 Q. Have you ever worked for a political campaign?

3 A. Can you define political campaign?

4 Q. Sure. Have you ever worked on a campaign for
5 someone who is running for office -- someone who's
6 running for office?

7 A. No.

8 Q. Have you ever worked on a campaign for an
9 issue that was going to be on the ballot?

10 A. Can you define work?

11 Q. Sure, either volunteer or paid advocacy for or
12 against an issue that was going to be on a ballot.

13 A. No.

14 Q. Have you ever worked for any voting rights
15 organization?

16 A. No.

17 Q. Have you ever been involved with a civil
18 rights organization?

19 A. Define involved.

20 Q. Either volunteer or a member or paid work for
21 a civil rights organization.

22 A. No.

23 Q. What sorts of engagements or activities have
24 you done relating to black voters?

25 A. Can you be more specific on engagement?

MEIKO SEYMOUR
HODGES vs PASSIDOMONovember 26, 2024
15

1 Q. Have you done any kind of advocacy work
2 relating to black voters?

3 A. Sorry. I'm having a hard time understanding
4 the question, more specifically with the use of
5 advocating for.

6 Q. Have you -- let's be more general.
7 Have you done any public advocacy relating to
8 issues of race?

9 A. I don't think so.

10 Q. Race equity listener?

11 A. Say that again.

12 Q. Are you a race equity listener?

13 A. I am.

14 Q. And what do you do as a race equity listener?

15 A. Sorry. Can I change that answer? I was.

16 Q. Okay. What did you do as a race equity
17 listener?

18 A. I sat with residents of St. Petersburg to
19 listen to their stories, their life experiences.

20 Q. And what sorts of residents were you speaking
21 with? How -- I guess I'll start -- how did you -- how
22 did the residents come to be connected with you for
23 listening?

24 A. A myriad of different -- different ways.

25 Q. Maybe some of the ways that you would get

MEIKO SEYMOUR
HODGES vs PASSIDOMONovember 26, 2024
16

1 connected with folks as a listener?

2 A. Sure. Through bumping into someone, a
3 stranger on the street or through social media, someone
4 might post something that I would think, oh, I would --
5 I think we need to listen to that story; just a plethora
6 of different ways.

7 Q. Was race equity listener a volunteer position?

8 A. It was a contract position.

9 Q. Okay. And who is the organization that
10 contracts with race equity listeners?

11 A. Foundation for a Healthy St. Pete.

12 Q. That contract, does that mean you were paid to
13 be a race equity listener?

14 A. Yes.

15 Q. Were the people you were listening to as a
16 race equity listener primarily black individuals?

17 A. No.

18 Q. Okay. Were they primarily white individuals?

19 A. Yes.

20 Q. Have you ever done any podcast episodes on
21 issues of race?

22 A. Yes.

23 Q. What are some of the issues relating to race
24 that you addressed on podcast episodes?

25 A. I know that I did one where we invited people

MEIKO SEYMOUR
HODGES vs PASSIDOMO

November 26, 2024

17

1 to sort of reflect on some of the issues related to
2 2020, and there might be one other. I can't -- I can't
3 recall.

4 Q. What do you mean by issues related to 2020?

5 A. There were some significant murders that
6 happened or came to light and we invited folks to sort
7 of record their reflections, and then we pieced that all
8 together into one episode.

9 Q. And were the racial issues related to 2020
10 primarily concerned with the experiences of black
11 individuals?

12 A. In that particular episode, yes.

13 Q. Besides this lawsuit, have you ever been
14 involved in a civil lawsuit as a party?

15 A. No.

16 Q. Have you ever testified in court?

17 A. No.

18 Q. Have you ever been charged with a crime?

19 A. From my recollection, there was an issue in
20 the previous location that I lived where my registration
21 had been expired. They sent notice to an address that I
22 didn't live at and because I didn't get that notice,
23 there was a bench warrant issued. I went to -- to
24 court. There was someone from the court who sort of met
25 with me in that proceeding and handed me a sheet of

MEIKO SEYMOUR
HODGES vs PASSIDOMONovember 26, 2024
18

1 paper saying, sign this. It doesn't go on your record.
2 Everything just kinds of -- kind of goes away. And so I
3 signed it.

4 I can't remember what the form was called or
5 what I checked on that form, but that's the only thing
6 that comes to mind when you ask that question.

7 Q. Okay. What state was that in?

8 A. Georgia.

9 Q. Okay. Tell me in your own words why you're
10 bringing this lawsuit.

11 A. I think I have been, along with my neighbors,
12 sort of unfairly grouped together in a section of
13 St. Pete and sort of tied with a larger section over in
14 Tampa, and that, in my opinion, severely limits proper
15 representation and limits my ability to sort of vote
16 with the rest of the residents and neighbors of
17 St. Petersburg.

18 Q. How did you come to be a plaintiff in this
19 lawsuit? And without telling me any actual
20 conversations with any of your attorneys, other than
21 that, generally, how did you come to be a plaintiff
22 here?

23 A. I was contacted by one of our lawyers from the
24 ACLU.

25 MS. ROBERTSON: Don't say anything about what

MEIKO SEYMOUR
HODGES vs PASSIDOMONovember 26, 2024
19

1 you spoke about with any of your lawyers.

2 BY MS. HARLE:

3 Q. Other than your attorneys, who else have you
4 spoken about -- who else have you spoken with about this
5 lawsuit?

6 A. I missed the beginning of your question.

7 Q. Yeah. Other than your lawyers, who else have
8 you spoken with about this lawsuit?

9 A. Family and a few friends.

10 Q. Have you ever spoken with -- just yes or no --
11 any of the other plaintiffs in this case?

12 A. No.

13 Q. During the redistricting process at issue in
14 this case that resulted in the maps that you're
15 challenging, were you aware that the process was
16 happening at the time?

17 A. I don't recall my awareness level.

18 Q. During the redistricting process, did you
19 communicate with any members or staff of the Florida
20 legislature about the process?

21 A. I did not.

22 Q. After the maps were enacted, have you
23 communicated with any members or staff of the Florida
24 legislature about the maps?

25 A. I have not.

MEIKO SEYMOUR
HODGES vs PASSIDOMONovember 26, 2024
20

1 Q. Have you at any point communicated with any
2 members of the media regarding the redistricting process
3 or the maps?

4 A. I have not.

5 Q. Have you made any statements on social media
6 about this lawsuit?

7 A. I have not.

8 Q. What social media apps or accounts do you
9 have?

10 A. Instagram, Facebook, Threads, Blewsky, and I'm
11 sure there are others that aren't coming to mind.

12 Q. Do you have Twitter X?

13 A. I no longer have Twitter X.

14 Q. Do you have TikTok?

15 A. Yes.

16 Q. Signal?

17 A. No.

18 Q. Have you made any written or oral statements
19 to any community organizations regarding this lawsuit?

20 A. No.

21 Q. Have you communicated to your employer about
22 this lawsuit?

23 A. No.

24 Q. Are you currently a registered voter?

25 A. Yes.

MEIKO SEYMOUR
HODGES vs PASSIDOMONovember 26, 2024
21

1 Q. And when is the last time you voted?

2 A. Just a few weeks ago.

3 Q. Have you voted in every presidential election
4 since you turned 18?

5 A. Yes.

6 Q. Have you voted in every state congressional
7 election?

8 A. Can you be more specific as to which state?

9 Q. Good question. Yes. Well, we'll cul de sac
10 here. You mentioned living in another state.

11 When did you initially move to the State of
12 Florida, what year?

13 A. 2015.

14 Q. Okay. Since 2015, have you voted in every
15 state congressional election in Florida?

16 A. I believe so, yes.

17 Q. Have you seen any of the alternative maps that
18 your attorneys and experts have proposed in this
19 lawsuit?

20 A. I have seen the maps that are in our
21 complaint. I've seen the maps that are in our
22 complaint.

23 MS. HARLE: Okay. Let's pull up the
24 complaint, Leila. If you can you please share your
25 screen. So this will be Exhibit 1.

MEIKO SEYMOUR
HODGES vs PASSIDOMONovember 26, 2024
22

1 (Defendant's Exhibit No. 1 was marked for
2 identification.)

3 BY MS. HARLE:

4 Q. And let's start with figure 3, the map you're
5 challenging, which I think is on page 20 of the
6 complaint.

7 MS. ROBERTSON: Can you zoom in a little bit
8 more? Thank you.

9 BY MS. HARLE:

10 Q. Mr. Seymour, do you remember seeing this map
11 before?

12 A. Yes.

13 Q. Okay. So can you explain to me all the
14 reasons why you think that District 16, where you live,
15 is problematic?

16 A. Are you asking where I -- why --

17 Q. Well, let me --

18 A. Why where I live is problematic?

19 Q. Well, you do live in District 16 on this map,
20 right?

21 A. Yes.

22 Q. Okay. Can you tell me just in looking at the
23 map all the reasons you think District 16 as a whole is
24 problematic?

25 MS. ROBERTSON: Object to form.

MEIKO SEYMOUR
HODGES vs PASSIDOMO

November 26, 2024

23

1 THE WITNESS: I'm unclear as to what you're --
2 what you're asking or what topics would be
3 problematic for District 16.

4 BY MS. HARLE:

5 Q. So earlier I asked you to explain in your own
6 words why you brought this lawsuit. Now that we have
7 the map in front of you, I just wanted to give you an
8 opportunity the state any other reasons why you're
9 challenging the district lines.

10 A. Can you state your question?

11 Q. Sure. Can you list all the reasons why you're
12 challenging the district lines reflected here on the
13 map?

14 A. Gotcha. So District 16 right now encompasses
15 a portion of the City of St. Petersburg, a portion of
16 the City of Tampa, and I think it doesn't -- it doesn't
17 make a lot of sense to group our portion of District 16
18 in St. Pete with -- with the City of Tampa. Our -- the
19 issues that are important to the residents of St. Pete,
20 more specifically -- or the residents of St. Pete and
21 those of the City of Tampa though regionally might seem
22 to be the same, they're much more nuanced depending on
23 where you live in that region and I think grouping us
24 together presents a challenge for representation and
25 what can be and should be advocated for or against in

MEIKO SEYMOUR
HODGES vs PASSIDOMONovember 26, 2024
24

1 terms of representing constituents on either side of the
2 bay.

3 Q. Can you tell me some of the issues that would
4 be of unique concern to individuals in St. Pete but not
5 in Tampa?

6 A. Sure. Like I said, a lot of the issues are
7 sort of regional, but when you niche down things like
8 our environmental concerns on -- in St. Pete due to our
9 -- just our geography, as an example, we are on a
10 peninsula versus being attached to the mainland. Also,
11 we have a myriad of housing-related issues that are very
12 different than those over on the Tampa side of District
13 16. For example, because we're on a peninsula, we are
14 sort of land challenged. We do not have anymore land
15 other than if you were to bulldoze and rebuild on top of
16 that; otherwise, you'd have to go up. So our real
17 estate issues, housing issues are much more -- they're
18 nuanced and -- nuanced to our location.

19 And then I think another one would be sort of
20 food insecurity and how that plays out in -- on the
21 south end of St. Pete versus how it plays out in what's
22 colored on the map in front of me on the Tampa side.

23 Q. What is unique about the food insecurity in
24 St. Pete?

25 A. There -- just for example, St. Pete has a long

MEIKO SEYMOUR
HODGES vs PASSIDOMONovember 26, 2024
25

1 history of pushing its lower income and/or black
2 residents towards the south end. That's been going on
3 for generations and so we have -- we have a good number
4 of areas in that -- in that purple shading that deal
5 with poverty and the results of poverty, and as such, we
6 have had a probably decades or more history or problems
7 with drawing in grocers for people to be able to go get
8 groceries or groceries that would be affordable and
9 healthy for -- for the residents in that purple shaded
10 area.

11 Q. Do you know how lower income and black
12 residents are being, you said, pushed to the south? How
13 does that happen?

14 A. I said the city has a history of having done
15 that.

16 Q. How would they do that?

17 A. Through -- redlining comes to mind. Also,
18 the, in more recent years, gentrification and
19 affordability of the housing stock and so at times, it
20 can be more economically feasible for residents to live
21 on the south end of the city versus the central and
22 north side of the city. As the city continues to grow,
23 that becomes more and more -- or has become more and
24 more of a challenge.

25 Q. Is there anything else relating to race

MEIKO SEYMOUR
HODGES vs PASSIDOMO

November 26, 2024

26

1 whether in District 16 or 18 on the map you're
2 challenging that you believe is problematic?

3 A. Well, the -- the majority of the city's black
4 residents tend to live in that shaded area in the map --
5 on the map in front of me, tend to live on the south end
6 of the city. More majority culture, more majority races
7 live on the north and west end of the city, so it seems
8 to me the shaded area seems to encompass the
9 historically black neighborhoods of St. Pete in that
10 shaded area.

11 Q. All right. Let's look up at paragraph 6 and 7
12 of the complaint. Okay. I'll give you time to read
13 that. The gist here of your allegations in paragraph 6,
14 you say, quote, in developing the challenged districts,
15 the legislature elevated race above all other
16 considerations. And then paragraph 7, you say, quote,
17 legislators and their staff purportedly drew these
18 districts in a race predominant manner to avoid the
19 diminishment of black voters' ability to elect
20 representatives of their choice in District 16.

21 So based on those allegations, my first
22 question is, what facts do you have that -- or what
23 facts do you have related to the racial motivations of
24 the legislature in drawing the challenged district
25 lines?

MEIKO SEYMOUR
HODGES vs PASSIDOMONovember 26, 2024
27

1 MS. ROBERTSON: Object to form.

2 THE WITNESS: Other than it's pretty obvious
3 that those -- the boundary lines on the St. Pete
4 side encompasses almost all of the historically
5 black neighborhoods, I have no facts.

6 BY MS. HARLE:

7 Q. Is there a certain percentage of black voting
8 age population that you think should be in your
9 district, 16?

10 A. I'm not sure.

11 Q. Do you know the correct percentage of black
12 voting age population in your district?

13 A. I do not.

14 Q. Are you familiar with the history of the
15 district boundaries for Hillsborough and Pinellas?

16 A. I am not.

17 Q. Are you aware that the communities that are
18 combined into District 16 in the map you're challenging
19 have been part of the same district since the early
20 1990s?

21 A. I'm not fully aware of that, but just because
22 it was something done in previous years doesn't mean
23 that it's right or fair or just.

24 Q. As -- I believe based on your pleadings, you
25 identify as a black voter; is that right?

MEIKO SEYMOUR
HODGES vs PASSIDOMONovember 26, 2024
28

1 A. Sorry. That's legal wording. Can you
2 rephrase that?

3 Q. Oh, sure. Do you identify as black?

4 A. Yes.

5 Q. Do you feel that the black vote is diluted in
6 your district, District 16?

7 MS. ROBERTSON: Object to form.

8 THE WITNESS: Can you define diluted?

9 BY MS. HARLE:

10 Q. Do you -- well, maybe I'll say it this way:
11 As -- what do you feel as a black voter is your harm
12 based on being grouped with the folks in Tampa?

13 A. I feel that I do not get to sort of vote along
14 with my northern and western neighbors in the city of
15 St. Pete. I think it's sort of an unfair practice to
16 not -- our city is not that large and so to not be able
17 to vote on issues related to the city with the entirety
18 of the city is unfair and thus affords a representation
19 that sort of -- that's sort of split and doesn't make
20 sense and additionally lumps me into being represented
21 by someone who has -- who has to sort of shoulder the
22 weight of a sliver of the City of St. Petersburg than a
23 much larger area in Tampa. Those are two very different
24 places.

25 Q. And do you know how many city's in Florida are

MEIKO SEYMOUR
HODGES vs PASSIDOMONovember 26, 2024
29

1 split by district lines?

2 A. I do not.

3 Q. Do you believe that it's always a problem if a
4 city is split by a distinct line?

5 A. I'm not sure.

6 Q. Are there any issues unique to black voters
7 that you feel like you can't get fair representation on
8 because of the way the district lines are drawn?

9 A. I'm not sure.

10 Q. Did you read the whole complaint before it was
11 filed?

12 A. Yes.

13 MS. HARLE: Let's -- does anybody else need a
14 break at all?

15 MS. ROBERTSON: We could take one.

16 MS. HARLE: Okay. Is that okay? Just five
17 minutes. Sorry. I hate to be that person.

18 MS. ROBERTSON: Okay.

19 MS. HARLE: Let's go off the record. Thanks.

20 (Brief recess.)

21 BY MS. HARLE:

22 Q. Okay. Let's look at paragraph 11 of the
23 complaint. So that paragraph is where you allege,
24 quote, Plaintiffs are further harmed because the
25 legislature sacrificed genuine communities of interest.

MEIKO SEYMOUR
HODGES vs PASSIDOMONovember 26, 2024
30

1 What facts were you relying on in making that
2 particular allegation?

3 MS. ROBERTSON: Object to form.

4 THE WITNESS: Other than what seems to be
5 obvious in looking at the map, no facts.

6 BY MS. HARLE:

7 Q. Okay. What are the genuine communities of
8 interest that you're referring to there that you allege
9 were sacrificed?

10 A. I would say just the -- the community that is
11 St. Petersburg as -- as a whole.

12 Q. Okay. Anything else?

13 A. That's what comes to mind right now.

14 Q. Okay. I notice it says communities, plural,
15 so I just want to make sure. Are there any other
16 communities of interest that you think are sacrificed
17 under the map you're challenging?

18 MS. ROBERTSON: Object to form.

19 THE WITNESS: I'm unsure right now.

20 BY MS. HARLE:

21 Q. Okay. Is there anything that would refresh
22 your recollection of which communities you were
23 referring to when -- when the complaint was filed?

24 MS. ROBERTSON: Object to form.

25 THE WITNESS: Not that I can think of right

MEIKO SEYMOUR
HODGES vs PASSIDOMONovember 26, 2024
31

1 now.

2 BY MS. HARLE:

3 Q. What do you understand communities of interest
4 to mean generally?

5 A. A grouping or a party or something similar.
6 I'm sure there's more, but that's what comes to mind.

7 Q. Do you think communities of interest can be
8 based on race?

9 A. Can you restate that?

10 Q. Sure. Do you think a community of interest
11 could be based on race?

12 A. Yes.

13 Q. Do you think a community of interest could be
14 based on faith?

15 A. Yes.

16 Q. Do you think a community of interest could be
17 based on income levels?

18 A. Yes.

19 Q. Do you think a community of interest could be
20 based on education levels?

21 A. Perhaps.

22 Q. Do you think a community of interest could be
23 based on political party?

24 A. Perhaps.

25 Q. Are you involved in any community leadership

MEIKO SEYMOUR
HODGES vs PASSIDOMONovember 26, 2024
32

1 organizations?

2 A. Can you define the leadership part?

3 Q. Well, are you involved with Leadership
4 St. Pete?

5 A. Can you define involved?

6 Q. What is your involvement with Leadership
7 St. Pete?

8 A. I'm an alumni of Leadership St. Pete.

9 Q. So is Leadership St. Pete, like, a program?

10 A. Yes.

11 Q. Okay. How long does it last?

12 A. Typically 9 to 10 months.

13 Q. Did you consider that -- do you consider
14 Leadership St. Pete a community leadership organization?

15 A. I'm sorry. Could you define community
16 leadership organization --

17 Q. Well --

18 A. -- again?

19 Q. -- this might be better: What -- how would
20 you describe Leadership St. Pete? What -- how would you
21 define it or describe it?

22 A. Sure. It is like other leadership
23 organizations across the country. It is a deep dive
24 into a municipality or a -- a county that helps you to
25 acclimate and know the interworkings of how that city of

MEIKO SEYMOUR
HODGES vs PASSIDOMONovember 26, 2024
33

1 county or state even works, who the players are, and
2 helps you be able to better champion the city as a fully
3 informed resident.

4 Q. So I think I heard you say leadership
5 organization. Is that right?

6 A. Yes.

7 Q. Okay. What is your involvement with the
8 St. Pete Chamber of Commerce?

9 A. I have no involvement with the St. Pete
10 Chamber of Commerce.

11 Q. Have you ever been involved with the St. Pete
12 Chamber of Commerce?

13 A. Yes.

14 Q. Okay. In what capacity were you involved with
15 the St. Pete Chamber of Commerce?

16 A. As a part of leadership of St. Pete, which is
17 a chamber program, and then also our church at the time
18 was a chamber member.

19 Q. A public arts commissioner for St. Pete?

20 A. What was the beginning of your question?

21 Q. Are you a public arts commissioner for
22 St. Pete?

23 A. I am not.

24 Q. Okay. Were you ever a public arts
25 commissioner for St. Pete?

MEIKO SEYMOUR
HODGES vs PASSIDOMONovember 26, 2024
34

1 A. Yes.

2 Q. Okay. And when were you a public arts
3 commissioner for St. Pete?

4 A. The specific dates are not coming to mind.

5 Q. Can you estimate what year or years you were
6 involved as a St. Pete public arts commissioner?

7 A. My estimation is somewhere between 20 --
8 somewhere between 2019 and 2022.

9 Q. What did you do as a public arts commissioner?

10 A. We were tasked with overseeing the City of
11 St. Pete's budget for public art in the city.

12 Q. So for those three that we just talked about,
13 the Leadership St. Pete, St. Pete Chamber of Commerce,
14 and public arts commissioner, the relevant communities
15 there was basically St. Pete; is that right?

16 A. Yes.

17 Q. Okay. Do you know any facts -- pivoting back
18 to the map now. Do you know any facts supporting the
19 assertion that the challenged plan reduces the influence
20 of black voters in District 18? So the district to your
21 northwest, do you know any facts supporting the
22 assertion that the plan reduces the influence of black
23 voters in District 18?

24 A. Again, other than what's obvious based on the
25 map and how it is drawn, I don't have other facts.

MEIKO SEYMOUR
HODGES vs PASSIDOMONovember 26, 2024
35

1 Q. Okay. And can you spell out for me what is
2 obvious about the map and how it is drawn?

3 A. It sections off a portion of the City of
4 St. Pete from the -- from the other.

5 Q. And how does that reduce the influence of back
6 voters, if that's your testimony?

7 A. Can you restate the question?

8 Q. Sure. It --

9 A. Or --

10 Q. How does sectioning off a portion of south
11 St. Pete reduce the influence of black voters?

12 A. Well, if they can't vote with the rest of the
13 city, then they're not getting their say as to who's
14 representing their city.

15 Q. And by they, are you referring to the black
16 voters in south St. Pete?

17 A. I'm referring to who you just asked me about.

18 Q. Okay. Let me try again. What is it about
19 sectioning off a portion of south St. Pete that reduces
20 the influence of black voters, if that is your
21 testimony?

22 A. Majority of the historical -- historically
23 black neighborhoods exists in the sectioned off portion
24 on that map. The majority of the city's black residents
25 live in that sectioned off portion of the map, which

MEIKO SEYMOUR
HODGES vs PASSIDOMONovember 26, 2024
36

1 means that that portion of the city's residents do not
2 get to vote with the other residents of the city.

3 Q. And just to get to the ultimate point, what
4 about that reduces the influence of black voters, about
5 two groups voting for separate representation?

6 MS. ROBERTSON: Object to form.

7 THE WITNESS: Can you ask that differently?

8 I'm unclear as to the question.

9 BY MS. HARLE:

10 Q. Yeah. I think where you left your answer was
11 that the groups of voters were not voting together, the
12 ones in south St. Pete and the ones in the rest of
13 St. Pete, so my question is, if you could take that one
14 step further and describe for me how you believe that
15 reduces the influence of black voters.

16 MS. ROBERTSON: Object to form.

17 THE WITNESS: They do not -- or we do not have
18 a say in who's representing the city of -- the City
19 of St. Pete.

20 BY MS. HARLE:

21 Q. So would it be your preference to be part of
22 District 16 so that your representative is the same
23 person representing all of St. Pete? Would that be your
24 preference?

25 A. I'm currently in District 16.

MEIKO SEYMOUR
HODGES vs PASSIDOMONovember 26, 2024
37

1 Q. Oh, sorry. Sorry. Sorry. District 18 -- I'm
2 sorry.

3 Would it be your preference to be part of
4 District 18 and vote in the same representative as the
5 other residents of St. Pete?

6 A. No.

7 Q. Okay. What would be your preference in terms
8 of who you vote with?

9 A. Well, the preference would be that the city
10 isn't split.

11 Q. Looking at paragraph 13 of the complaint, on
12 the third line down, you allege Floridian's including
13 individual legislators called out and questioned the
14 legislature's unconstitutional actions.

15 Who are you aware of that called out or
16 questioned the legislature during the redistricting
17 process?

18 A. Other than what has been disclosed through our
19 lawyers, I don't have any to add.

20 Q. Okay. Paragraph 20, this is where you allege
21 that the enacted plan splits up your communities along
22 racial lines and groups your communities with dissimilar
23 ones because of race.

24 So the question is, which community are you
25 referring to there when you say the plan splits up your

MEIKO SEYMOUR
HODGES vs PASSIDOMONovember 26, 2024
38

1 community?

2 A. St. Pete.

3 Q. And where you allege there that the plan
4 groups your community with dissimilar ones because of
5 race, what is the dissimilar community you're referring
6 to?

7 A. Tampa.

8 Q. Do you know --

9 A. Or --

10 Q. I'm sorry?

11 MS. ROBERTSON: He was going to say something.

12 MS. HARLE: Oh.

13 THE WITNESS: Or other neighborhoods in 16
14 that's across -- across the bay.

15 BY MS. HARLE:

16 Q. Do you know if the part of 16 across the bay
17 has a significant number of black residents?

18 A. I'm unsure.

19 Q. Okay. Looking at paragraph 97, this is where
20 you refer to, quote, the direct evidence of racial
21 predominance. So I just want to make sure I'm giving
22 you every opportunity just to share on this point. I
23 know -- I apologize if it sounds redundant, but what
24 direct evidence do you have that race predominates the
25 drawing of the lines of 16 and 18?

MEIKO SEYMOUR
HODGES vs PASSIDOMONovember 26, 2024
39

1 A. Again, other than what is obvious on the map
2 and through -- yeah, what's on the map, I am not
3 bringing any other sort of evidence.

4 Q. And so I mean, correct me if I'm wrong, but is
5 -- is your testimony that you have a general
6 understanding or belief that the residents of south
7 St. Pete are predominantly black?

8 A. Can you repeat the question?

9 Q. Yes. Is it your understanding or belief that
10 the residents of south St. Pete that are in District 16
11 are predominantly black?

12 A. Yes.

13 Q. Have you ever looked at the demographic
14 distribution across all of St. Pete in terms of race?

15 A. I can't recall.

16 Q. Let's scroll up to paragraph 95. This was
17 where you allege, quote, these race-based decisions
18 resulted in a map that splits neighborhoods and ignores
19 traditional redistricting criteria.

20 What do you believe to be appropriate criteria
21 for the legislature to use when its doing redistricting?

22 A. Well, I'm not an expert on this stuff;
23 however, something like a natural border such as Tampa
24 Bay should definitely be taken into consideration. I
25 think there may be others, but I can't think of them

MEIKO SEYMOUR
HODGES vs PASSIDOMO

November 26, 2024

40

1 right now.

2 Q. That allegation uses the word "ignores".

3 Are there any race-neutral criteria besides
4 Tampa Bay that you believe the legislature ignored?

5 A. Would you mind repeating the question?

6 Q. Is there any race-neutral criteria that you
7 believe the legislature ignored when doing the
8 redistricting?

9 A. I'm not sure at this time.

10 Q. Do you know whether at the time you filed your
11 complaint you were aware of other criteria you believed
12 the legislature was ignoring?

13 A. I can't remember my level of awareness at that
14 time.

15 Q. Let's look at paragraph 131. This is where
16 you allege, quote, the legislature lacked good reasons
17 to believe that the enacted plan was necessary to
18 achieve Tier One compliance.

19 Do you know what Tier One compliance means in
20 your complaint?

21 A. I do not.

22 Q. Let's look at pages 13 and 14 of the complaint
23 where you have a map of plan 42.

24 Do you know whether you've seen this map
25 before? Or I guess I should say, have you seen this map

MEIKO SEYMOUR
HODGES vs PASSIDOMONovember 26, 2024
41

1 before?

2 A. Yes.

3 Q. Can you explain in your own words why you
4 proposed this map as an alternative to the map you're
5 challenging?

6 MS. ROBERTSON: Object to form.

7 THE WITNESS: I -- it includes the entirety of
8 the City of St. Pete. I think there may be other
9 reasons, but that's the one that comes to mind.

10 BY MS. HARLE:

11 Q. And is -- the line there at the top of what's
12 District 24, is that roughly the municipal line for the
13 top of St. Pete?

14 A. It is not.

15 Q. Is the municipal line for the border of
16 St. Pete north or south of the district line there
17 between 24 and 16?

18 A. It's hard to tell on this map.

19 Q. So earlier when you said that the district
20 line between 16 and 24 here did not reflect the
21 municipal boundary, you know, what made you give that
22 answer?

23 A. Well, the City of St. Pete has a unique --
24 pardon my words -- shape to it and so according to your
25 question about the top line, that top line does not

MEIKO SEYMOUR
HODGES vs PASSIDOMONovember 26, 2024
42

1 reflect the shape of the city boundaries or borders.

2 Q. Let's look at figure 6, the Isbell map.

3 And do you recall seeing this map before?

4 A. Yes.

5 Q. And what is it about this map that you prefer
6 to the map that you're challenging?

7 A. Again, it includes the entirety -- it seems to
8 include the entirety of the City of St. Pete. Again,
9 there might be other reasons, but that's one that stands
10 out.

11 Q. So is -- the top line there on the top of 18,
12 does that match the municipal line for the northern
13 border of St. Pete?

14 A. It's hard to tell on the map that's in front
15 of me.

16 Q. So for this map and the one we just looked at
17 before it, when you say it includes all of St. Pete, but
18 then you say it doesn't track the city boundaries of
19 St. Pete, can you tell me why you're saying that it
20 includes all of St. Pete?

21 A. Includes all of St. Pete. St. Pete's northern
22 boundary where it comes up through the water gets
23 jagged, which would make sense as a natural border. So
24 I cannot -- based on the map in front of me, I cannot
25 tell you if that northern boundary is correct.

MEIKO SEYMOUR
HODGES vs PASSIDOMONovember 26, 2024
43

1 Q. Have you seen maps of plan A, B, and C that
2 your expert witnesses have filed with the court?

3 A. I'm not sure what maps you're -- what do you
4 mean by A, B, and C?

5 Q. Have you seen any maps that your expert
6 witnesses have filed with the court so far?

7 A. I have not.

8 MS. HARLE: Let's go to Exhibit 2, which will
9 be the initial disclosures.

10 (Defendant's Exhibit No. 2 was marked for
11 identification.)

12 BY MS. HARLE:

13 Q. Does this document look familiar to you?

14 MS. HARLE: Leila, can you scroll to the
15 bottom and up, please.

16 BY MS. HARLE:

17 Q. Mr. Seymour, do you know if you've seen this
18 document before?

19 A. I believe so.

20 Q. And do you remember when you've seen this
21 document?

22 MS. ROBERTSON: Caution my client not to
23 disclose anything about what he spoke about with
24 his attorney.

25 THE WITNESS: I'm not sure.

MEIKO SEYMOUR
HODGES vs PASSIDOMONovember 26, 2024
44

1 BY MS. HARLE:

2 Q. Section 1A there has your name and says,
3 quote, you have -- well, it says you, quote, have
4 information tending to show that the challenged
5 districts caused harm, end quote, you and the other
6 residents.

7 So what harm does the challenged district
8 cause to you?

9 MS. ROBERTSON: Object to form.

10 THE WITNESS: Can you be more specific?

11 BY MS. HARLE:

12 Q. Not sure, but I can. These are your words.
13 So this says you have information tending to show that
14 the challenged districts cause harm to you.

15 So my question is, what harm does the
16 challenged district cause to you?

17 A. Can you define harm in your question?

18 Q. Unfortunately, I can't because I'm just using
19 the word that you used, which you did not define, so I
20 guess maybe I can ask, what did you mean when you said
21 harm here, that the -- when you said the challenged
22 districts caused harm to you, what did you mean by that?

23 A. I've been unfairly lumped in with residents
24 that are not in my community and I am unable to vote for
25 representation for the City of St. Pete with the rest of

MEIKO SEYMOUR
HODGES vs PASSIDOMONovember 26, 2024
45

1 my neighbors in the city of St. Pete. I'm sure there
2 are others. They don't come to mind right now, but
3 those are the two that I'm thinking about.

4 Q. And so in terms of you having information
5 tending to show that, what information do you have to
6 show that the challenged districts caused harm to you?

7 MS. ROBERTSON: Object to form.

8 THE WITNESS: Other than what is on -- or
9 what's shown on the current map or what's current,
10 I'm not sure.

11 BY MS. HARLE:

12 Q. And where you say -- where you refer to the
13 harm that the challenged districts cause other
14 residents, is that the same harm that you just described
15 or is there any other harm that you believe other
16 residents are caused?

17 A. I would say it includes what I just said and
18 probably others.

19 Q. As we sit here today, is there any other harm
20 that you can think of that the challenged districts
21 caused to other residents of 16 or 18?

22 MS. ROBERTSON: Object to form.

23 THE WITNESS: Not that I can think of right
24 now.

25 BY MS. HARLE:

MEIKO SEYMOUR
HODGES vs PASSIDOMONovember 26, 2024
46

1 Q. Do you know of any individual who would have
2 information about whether the district lines that you're
3 challenging were drawn based primarily on race?

4 A. Not sure.

5 MS. HARLE: Okay. That is the end of my
6 questions.

7 MS. ROBERTSON: Okay. I don't have any
8 questions.

9 MS. HARLE: Okay. We'll order a copy, Wendy.

10 MS. ROBERTSON: We'd like to read and we'll
11 also order a copy. Can you please bill the ACLU,
12 not Butler Weihmuller for our copy.

13 (This deposition was concluded at 11:45 a.m.)

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MEIKO SEYMOUR
HODGES vs PASSIDOMO

November 26, 2024

47

CERTIFICATE OF OATH

STATE OF FLORIDA)

COUNTY OF DUVAL)

I, WENDY E. RIVERA, Florida Professional
Reporter, Notary Public, State of Florida, certify that
MEIKO SEYMOUR personally appeared before me via
videoconference on November 26, 2024, and was duly
sworn.

Signed this 12th day of December, 2024.



Wendy E. Rivera
Notary Public, State of Florida
Commission No.: HH 373469
Expires: March 15, 2027



WENDY E. RIVERA
Commission # HH 373469
Expires March 15, 2027

MEIKO SEYMOUR
HODGES vs PASSIDOMO

November 26, 2024

48

1 CERTIFICATE OF REPORTER

2
3 STATE OF FLORIDA)4 COUNTY OF DUVAL)
5

6 I, WENDY E. RIVERA, Florida Professional
7 Reporter, do hereby certify that I was authorized to and
8 did remotely stenographically report the videoconference
9 deposition of MEIKO SEYMOUR; that a review of the
10 transcript WAS requested; and that the foregoing
11 transcript, pages 1 through 46, is a true record of my
12 stenographic notes.

13
14 I FURTHER CERTIFY that I am not a relative,
15 employee, or attorney, or counsel of any of the parties,
16 nor am I a relative or employee of any of the parties'
17 attorney or counsel connected with the action, nor am I
18 financially interested in the action.

19
20 DATED this 12th day of December, 2024.

21
22 

23
24 _____
25 Wendy E. Rivera

MEIKO SEYMOUR
HODGES vs PASSIDOMONovember 26, 2024
49

DEPOSITION ERRATA SHEET

Assignment No.: J12004912

Case Caption: KETO NORD HODGES et al vs. KATHLEEN
PASSIDOMO et al

Witness: MEIKO SEYMOUR

DECLARATION UNDER PENALTY OF PERJURY

I declare under penalty of perjury that I have read the entire transcript of my deposition taken in the captioned matter or the same has been read to me, and the same is true and accurate, save and except for changes and/or corrections, if any, as indicated by me on the DEPOSITION ERRATA SHEET hereof, with the understanding that I offer these changes as if still under oath.

Signed on the _____ day of _____, 20____.

MEIKO SEYMOUR

MEIKO SEYMOUR
HODGES vs PASSIDOMONovember 26, 2024
50

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Page No. _____ Line No. _____ Change to: _____

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Reason for change: _____

Page No. _____ Line No. _____ Change to: _____

Reason for change: _____

Page No. _____ Line No. _____ Change to: _____

Reason for change: _____

SIGNATURE: _____ DATE: _____

MEIKO SEYMOUR

MEIKO SEYMOUR
HODGES vs PASSIDOMO

November 26, 2024

51

DEPOSITION ERRATA SHEET

Page No. _____ Line No. _____ Change to: _____

Reason for change: _____

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Page No. _____ Line No. _____ Change to: _____

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Page No. _____ Line No. _____ Change to: _____

Reason for change: _____

Page No. _____ Line No. _____ Change to: _____

Reason for change: _____

SIGNATURE: _____ DATE: _____

MEIKO SEYMOUR

**MEIKO SEYMOUR
HODGES vs PASSIDOMO**

November 26, 2024

Index: 1..allege

	28:6	2024	26:11,16	37:19
Exhibits	36:22,25	4:2 10:17		additionall
	38:13,16,	13:2,5	8	y
12004912 Me	25 39:10	2027		28:20
iko.	41:17,20	9:12	824	address
Seymour.	45:21	24	6:19 7:5	6:17 7:8,
EXHIBIT1	18	41:12,17,	9	11,23,25
3:12	7:13 21:4	20		8:2,4
21:25	26:1	26		17:21
22:1	34:20,23	4:2		addressed
12004912 Me	37:1,4		9	16:24
iko.	38:25	3	32:12	administrat
Seymour.	42:11		95	ive
EXHIBIT2	45:21		39:16	13:8
3:13	1990s	3	97	advance
43:8,10	27:20	22:4	38:19	5:25
1	1A	33701		advocacy
21:25	44:2	6:20	A	14:11
22:1		33712		15:1,7
10	2	7:10	a.m.	advocated
32:12		33rd	46:13	23:25
10th	2	7:9	ability	advocating
6:19 7:6	43:8,10	3rd	18:15	15:5
11	20	7:15	26:19	affordabili
29:22	22:5 34:7		acclimate	ty
11:45	37:20	4	32:25	25:19
46:13	2015		accounts	affordable
13	13:21	42	20:8	25:8
37:11	21:13,14	40:23	achieve	affords
40:22	2017	441	40:18	28:18
131	7:16	7:9,15	ACLU	age
40:15	2018		18:24	27:8,12
14	7:16	6	46:11	Aldersgate
40:22	2019		actions	8:19
16	34:8	6	6:1 37:14	allegation
7:13	2020	26:11,13	activities	30:2 40:2
22:14,19,	17:2,4,9	42:2	14:23	allegations
23 23:3,	2022		actual	26:13,21
14,17	6:22 34:8	7	18:19	allege
24:13	2023		add	29:23
26:1,20	13:21	7		
27:9,18				

MEIKO SEYMOUR
HODGES vs PASSIDOMONovember 26, 2024
Index: alternative..challenged

30:8	24:10	35:5	15:2	bulldoze
37:12,20	attend	back-end	16:16	24:15
38:3	13:25	13:8	17:10	bumping
39:17			25:1,11	16:2
40:16	attendees	background	26:3,9,19	Butler
	10:23	8:11	27:5,7,	46:12
alternative	11:21,25	ballot	11,25	
21:17	12:4	14:9,12	28:3,5,11	
41:4			29:6	C
alumni	attorney	based	34:20,22	
32:8	5:9,10	26:21	35:11,15,	called
	6:5,6	27:24	20,23,24	18:4
and/or	43:24	28:12	36:4,15	37:13,15
25:1	attorneys	31:8,11,	38:17	campaign
answers	4:10 6:7,	14,17,20,	39:7,11	14:2,3,4,
5:4	9 18:20	23 34:24		8
anymore	19:3	42:24	Blewsky	
24:14	21:18	46:3	20:10	capacity
				33:14
apartment	August	basically	border	
6:23	10:17	34:15	39:23	case
	13:2,5		41:15	4:11
apologize		bay	42:13,23	19:11,14
7:2 38:23	Avenue	24:2		caused
	6:19 7:6	38:14,16	borders	44:5,22
apps		39:24	42:1	45:6,16,
20:8	avoid	40:4	bottom	21
	26:18		43:15	Caution
area	aware	beginning	boundaries	43:22
25:10	7:17,20	19:6	27:15	central
26:4,8,10	19:15	33:20	42:1,18	25:21
28:23	27:17,21	belief	boundary	certificati
areas	37:15	39:6,9	27:3	ons
25:4	40:11	believed	41:21	10:25
art	awareness	40:11	42:22,25	challenge
34:11	19:17	bench	break	23:24
arts	40:13	17:23	5:11	25:24
33:19,21,			29:14	challenged
24 34:2,	B	Bible		24:14
6,9,14		10:6	bringing	26:14,24
assertion	bachelor's	bill	18:10	34:19
34:19,22	9:14,17,	46:11	39:3	44:4,7,
assume	24 10:2	bit	brought	14,16,21
9:13	back	22:7	23:6	45:6,13,
11:25	13:1	black	budget	
attached	34:17	14:24	34:11	

MEIKO SEYMOUR
HODGES vs PASSIDOMONovember 26, 2024
Index: challenging..dad

20	12:10,12,	colored	29:10,23	contracts
challenging	13,14,15,	24:22	30:23	16:10
7:12	17,19	combined	37:11	conversatio
19:15	23:15,16,	27:18	40:11,20,	ns
22:5	18,21	Commerce	22	6:1 18:20
23:9,12	25:14,21,	33:8,10,	complete	copy
26:2	22 26:6,7	12,15	5:4	46:9,11,
27:18	28:14,16,	34:13	compliance	12
30:17	17,18,22	commissione	40:18,19	correct
41:5 42:6	29:4	r	concern	9:20
46:3	32:25	33:19,21,	24:4	27:11
chamber	33:2	25 34:3,	concerned	39:4
33:8,10,	34:10,11	6,9,14	17:10	42:25
12,15,17,	35:3,13,	communicate	concerns	country
18 34:13	14 36:2,	19:19	24:8	32:23
champion	18 37:9	communicate	concluded	county
33:2	41:8,23	d	46:13	32:24
chance	42:1,8,18	19:23	condition	33:1
7:17,20	44:25	20:1,21	5:16	court
change	45:1	communities	congression	4:25
15:15	city's	27:17	al	17:16,24
charged	26:3	29:25	21:6,15	43:2,6
17:18	28:25	30:7,14,	connected	credits
checked	35:24	16,22	15:22	10:1,4
18:5	36:1	31:3,7	16:1	crime
choice	civil	34:14	considerati	17:18
26:20	14:17,21	37:21,22	on	criteria
church	17:14	community	39:24	39:19,20
10:14,19,	classes	10:5	considerati	40:3,6,11
23,25	8:24 9:5	13:15,16,	ons	cul
11:3,8,	classwork	20,23	26:16	21:9
10,11,14,	9:7	20:19	constituent	culture
22 12:1,	client	30:10	s	26:6
4,6,14,	43:22	31:10,13,	24:1	current
15,17,19	co-	16,19,22,	contacted	6:18
13:9,15,	plaintiffs	25 32:14,	18:23	10:10
17,20,23	4:17	15 37:24	continues	11:4 45:9
33:17	code	38:1,4,5	25:22	D
churches	7:9	44:24	contract	dad
11:5,9	college	complaint	16:8,12	
city	10:1,4,5,	21:21,22,		
9:9	6	24 22:6		
		26:12		

**MEIKO SEYMOUR
HODGES vs PASSIDOMO**November 26, 2024
Index: dates..evidence

10:9	5:23,25	17 24:12	driver's	encompass
dates	6:4,12	26:1,20,	7:23 8:3	26:8
34:4	46:13	24 27:12,	drugs	encompasses
de	depositions	15,18,19	5:16	23:14
21:9	4:17	28:6	due	27:4
deal	describe	29:1,8	24:8	end
25:4	10:18	34:20,23	duly	13:3,18
decades	32:20,21	36:22,25	4:5	24:21
25:6	36:14	37:1,4	duties	25:2,21
decisions	developing	39:10	10:19	26:5,7
39:17	26:14	41:12,16,		44:5 46:5
deep	differently	19 44:7,	E	engagement
32:23	36:7	16 46:2		14:25
defendant's	diluted	districts		engagements
22:1	28:5,8	26:14,18	earlier	14:23
43:10	diminishmen	44:5,14,	23:5	entirety
define	t	22 45:6,	41:19	28:17
5:24	26:19	13,20	early	41:7
11:24	direct	dive	27:19	42:7,8
14:3,10,	4:7	32:23	economical	environment
19 28:8	38:20,24	DMV	y	al
32:2,5,	disclose	8:8	25:20	24:8
15,21	43:23	document	education	episode
44:17,19	disclosed	43:13,18,	31:20	17:8,12
degree	37:18	21	educational	episodes
8:13,25	disclosures	documents	8:11	16:20,24
9:17,24	43:9	6:2,11	elect	equity
10:24	dissimilar	Donor	26:19	15:10,12,
demographic	37:22	13:11	election	14,16
39:13	38:4,5	donors	21:3,7,15	16:7,10,
Denise	distinct	11:21	elevated	13,16
4:9	27:9 29:4	drawing	26:15	estate
depending	distributio	25:7	employed	24:17
23:22	n	26:24	13:5	estimate
depends	39:14	38:25	employer	34:5
12:22	district	drawn	10:10	estimation
deposed	7:13	29:8	20:21	34:7
4:21	22:14,19,	34:25	enacted	evidence
deposition	23 23:3,	35:2 46:3	19:22	38:20,24
4:1,11	9,12,14,	drew	37:21	39:3
		26:17	40:17	

MEIKO SEYMOUR
HODGES vs PASSIDOMONovember 26, 2024
Index: EXAMINATION..Harle

EXAMINATION	30:1,5	Focus	generally	grocers
4:7	34:17,18,	11:10	18:21	25:7
	21,25		31:4	
excuse		focussed		group
12:10	fair	11:4,8,12	generations	23:17
	27:23		25:3	
executive	29:7	folks		grouped
13:18		16:1 17:6	gentrification	18:12
	faith	28:12		28:12
Exhibit	31:14		25:18	
21:25		food		grouping
22:1	falls	24:20,23	genuine	23:23
43:8,10	7:11		29:25	31:5
		form	30:7	
exist	familiar	6:13		groups
11:15,16,	4:20	18:4,5	geographic	36:5,11
18	27:14	22:25	11:22	37:22
	43:13	27:1 28:7	12:16	38:4
exists		30:3,18,	geography	
35:23	family	24 36:6,	24:9	grow
	13:25	16 41:6		25:22
experience	19:9	44:9	Georgia	guess
10:1		45:7,22	18:8	9:5 15:21
experiences	feasible			40:25
15:19	25:20		gist	44:20
17:10	feel	forming	26:13	
	28:5,11,	10:24		
expert	13 29:7	Foundation	give	H
39:22		16:11	5:4 23:7	
43:2,5	feeling		26:12	
	5:17	friends	41:21	handed
experts		19:9		17:25
21:18	field		giving	
	8:14	froggy	5:13	happen
expired		7:2	38:21	25:13
17:21	figure	front		
	22:4 42:2	23:7	good	happened
explain		24:22	4:9,12	17:6
22:13	filed	26:5	21:9 25:3	happening
23:5 41:3	29:11	42:14,24	40:16	19:16
	30:23			
eye	40:10		Gotcha	hard
6:3	43:2,6	fully	23:14	15:3
		27:21		41:18
	Florida	33:2	graduate	42:14
F	4:10 6:19		9:11	
	8:21 9:1	G		
Facebook	19:19,23		great	Harle
20:10	21:12,15		4:19 5:2	4:8,10
	28:25		11:3 13:1	6:16 19:2
facts		general		21:23
26:22,23	Floridian's	15:6 39:5	groceries	22:3,9
27:5	37:12		25:8	23:4 27:6

**MEIKO SEYMOUR
HODGES vs PASSIDOMO**

November 26, 2024

Index: harm..lawsuit

28:9	historically	important	20:10	28:17
29:13,16, 19,21	y	23:19	instructs	29:6
30:6,20	26:9 27:4	include	5:10	
31:2	35:22	42:8	interest	J
36:9,20	history	includes	29:25	
38:12,15	25:1,6,14	10:21,22,	30:8,16	jagged
41:10	27:14	23,24,25	31:3,7,	42:23
43:8,12,	hours	41:7	10,13,16,	job
14,16	6:10	42:7,17,	19,22	5:2 10:19
44:1,11	house	20,21	interrupt	13:10,16
45:11,25	6:23,24	45:17	5:5	July
46:5,9	housing	including	interworkin	6:22
harm	24:17	37:12	gs	
28:11	25:19	income	32:25	K
44:5,7,	housing-	25:1,11	invited	
14,15,17,	related	31:17	16:25	kind
21,22	24:11	individual	17:6	15:1 18:2
45:6,13,		37:13	involved	kinds
14,15,19	I	46:1	14:17,19	18:2
harmed		individuals	17:14	
29:24	identificat	16:16,18	31:25	L
hate	ion	17:11	32:3,5	
29:17	22:2	24:4	33:11,14	
healthy	43:11	influence	34:6	lacked
16:11	identify	34:19,22	involvement	40:16
25:9	11:23	35:5,11,	32:6	Lakeland
heard	12:4	20 36:4,	33:7,9	10:7
9:2 33:4	27:25	15	Isbell	land
held	28:3	information	42:2	24:14
13:18	Igniter	44:4,13	issue	large
helps	10:11,13,	45:4,5	14:9,12	28:16
32:24	16 13:5	46:2	17:19	larger
33:2	ignores	informed	19:13	18:13
high	39:18	33:3	issued	28:23
8:11	40:2	initial	17:23	lawsuit
Hillsboroug	ignoring	43:9	issues	17:13,14
h	40:12	initially	15:8	18:10,19
27:15	ill	21:11	16:21,23	19:5,8
historical	5:17	insecurity	17:1,4,9	20:6,19,
35:22	imagine	24:20,23	23:19	22 21:19
	12:23	Instagram	24:3,6,	23:6
			11,17	

**MEIKO SEYMOUR
HODGES vs PASSIDOMO**November 26, 2024
Index: lawyers..Ministry

lawyers	life	11:22	28:19	means
18:23	15:19	17:20	30:15	36:1
19:1,7	light	24:18	38:21	40:19
37:19	17:6	long	42:23	media
lead	limits	6:8 8:7	making	16:3
12:24	18:14,15	13:12	30:1	20:2,5,8
leadership	lines	24:25	management	medical
31:25	23:9,12	32:11	13:11	5:16
32:2,3,6,	26:25	longer	manner	medications
8,9,14,	27:3	20:13	26:18	5:17
16,20,22	29:1,8	looked	map	meeting
33:4,16	37:22	39:13	22:4,10,	10:21,22
34:13	38:25	42:16	19,23	meetings
left	46:2	lost	23:7,13	6:2
13:22	list	13:3	24:22	Meiko
36:10	23:11	lot	26:1,4,5	4:1,4,15
legal	listen	23:17	27:18	member
28:1	15:19	24:6	30:5,17	14:20
legislators	16:5	lower	34:18,25	33:18
26:17	listener	25:1,11	35:2,24,	members
37:13	15:10,12,	lumped	25 39:1,	19:19,23
legislature	14,17	44:23	2,18	20:2
19:20,24	16:1,7,	lumps	40:23,24,	mentioned
26:15,24	13,16	28:20	25 41:4,	21:10
29:25	listeners		18 42:2,	met
37:16	16:10		3,5,6,14,	17:24
39:21	listening	M	16,24	mind
40:4,7,	15:23	M-E-I-K-O	45:9	5:3 11:2
12,16	16:15	4:15	maps	18:6
legislature	live	made	7:12	20:11
's	7:5 17:22	20:5,18	19:14,22,	25:17
37:14	22:14,18,	41:21	24 20:3	30:13
Leila	19 23:23	mainland	21:17,20,	31:6 34:4
21:24	25:20	24:10	21 43:1,	40:5 41:9
43:14	26:4,5,7	majority	3,5	45:2
level	35:25	9:7 26:3,	marked	ministers
19:17	lived	6 35:22,	22:1	13:9
40:13	17:20	24	43:10	ministries
levels	living	make	master's	13:9
31:17,20	21:10	5:6 23:17	8:13	Ministry
license	location		9:13,23	
7:24 8:3			match	
			42:12	

MEIKO SEYMOUR
HODGES vs PASSIDOMO

November 26, 2024

Index: minutes..Pete

8:20		24:18	20:18	32:2
minutes	N	number	order	33:16
29:17		25:3	46:9,11	36:21
missed	natural	38:17	Oregon	37:3
19:6	39:23		9:10	38:16
	42:23	O		Partners
Mission	neighborhoods		organization	13:6,7,
10:11,13,		oath	10:11	12,14
15 13:5	26:9 27:5	4:23	14:15,18,	party
mixture	35:23	Object	21 16:9	17:14
8:17	38:13	6:13	32:14,16	31:5,23
moment	39:18	22:25	33:5	pastor
11:4	neighbors	27:1 28:7	organization	12:24
months	18:11,16	30:3,18,	ns	13:18
13:13	28:14	24 36:6,	20:19	peninsula
32:12	45:1	16 41:6	32:1,23	24:10,13
morning	niche	44:9	overseeing	people
4:9,12	24:7	45:7,22	34:10	11:23,24
motivations	nonverbal	objects		12:1
26:23	12:2	5:9	P	16:15,25
move	north	observe		25:7
6:21 7:15	7:9,15	4:16	pages	percentage
21:11	25:22	obtain	40:22	27:7,11
moved	26:7	9:16 10:3	paid	person
7:5	41:16	obvious	10:12	8:16 9:8,
moves	northern	27:2 30:5	14:11,20	9 29:17
8:5	28:14	34:24	16:12	36:23
moving	42:12,21,	35:2 39:1	paper	Pete
7:18,21	25	occurred	18:1	7:7 16:11
municipal	northwest	8:6	paragraph	18:13
41:12,15,	34:21	office	26:11,13,	23:18,19,
21 42:12	notice	14:5,6	16 29:22,	20 24:4,
municipalit	17:21,22	online	23 37:11,	8,21,24,
y	30:14	8:16 9:8	20 38:19	25 26:9
32:24	November	opinion	39:16	27:3
murders	4:2	18:14	40:15	28:15
17:5	Novum	opportunity	pardon	32:4,7,8,
myriad	13:6,7,	23:8	41:24	9,14,20
15:24	12,14	38:22	part	33:8,9,
24:11	nuanced	oral	9:24,25	11,15,16,
	23:22		27:19	19,22,25
				34:3,6,
				13,15

**MEIKO SEYMOUR
HODGES vs PASSIDOMO**November 26, 2024
Index: Pete's..question

35:4,11, 16,19 36:12,13, 19,23 37:5 38:2 39:7,10, 14 41:8, 13,16,23 42:8,13, 17,19,20, 21 44:25 45:1	plant 11:8,10 12:4,7 planted 12:20,22 planter 10:14,20 planting 10:25 12:17 players 33:1 plays 24:20,21 Petersburg 6:19 15:18 18:17 23:15 28:22 30:11 pieced 17:7 Pinellas 13:15,16, 19,22 27:15 pivoting 34:17 places 28:24 plaintiff 18:18,21 plaintiffs 19:11 29:24 plan 34:19,22 37:21,25 38:3 40:17,23 43:1	position 16:7,8 possibility 12:23 post 16:4 potential 10:21,23 11:21,25 potentially 12:24 poverty 25:5 practice 28:15 predominanc e 38:21 predominant 26:18 predominant ly 39:7,11 predominate s 38:24 prefer 42:5 preference 36:21,24 37:3,7,9 prep 6:8,14 preparation 6:12 prepare 5:22,24 6:3 prepping 6:5	presents 23:24 presidentia l 21:3 pretty 27:2 preventing 5:13 previous 10:1 17:20 27:22 previously 10:3 primarily 16:16,18 17:10 46:3 prior 7:8 problem 29:3 problematic 22:15,18, 24 23:3 26:2 problems 25:6 proceeding 17:25 process 19:13,15, 18,20 20:2 37:17 program 8:16 9:23,24, 25 10:24 32:9	33:17 proper 18:14 proposed 21:18 41:4 provide 13:8 public 15:7 33:19,21, 24 34:2, 6,9,11,14 pull 21:23 purple 25:4,9 purportedly 26:17 pursuing 8:13 9:13 pushed 25:12 pushing 25:1 <hr/> Q <hr/> question 5:8,9 7:19 8:1 9:6 11:6 15:4 18:6 19:6 21:9 23:10 26:22 33:20 35:7 36:8,13 37:24 39:8 40:5
---	---	--	--	---

MEIKO SEYMOUR
HODGES vs PASSIDOMONovember 26, 2024
Index: questioned..restate

41:25	26:12	25:17	8:10	28:20
44:15,17	29:10	reduce	related	representin
questioned	46:10	35:5,11	17:1,4,9	g
37:13,16	real	reduces	26:23	24:1
questions	24:16	34:19,22	28:17	35:14
9:2 46:6,	reason	35:19	relating	36:18,23
8	13:22	36:4,15	14:24	requirement
quote	reasons	redundant	15:2,7	10:2
26:14,16	22:14,23	38:23	16:23	residence
29:24	23:8,11	refer	25:25	6:18
38:20	40:16	38:20	relevant	resident
39:17	41:9 42:9	45:12	34:14	33:3
40:16	rebuild	referring	relying	residential
44:3,5	24:15	30:8,23	30:1	7:24 8:4
R	recall	35:15,17	remember	residents
	7:14 17:3	37:25	18:4	15:18,20,
	19:17	38:5	22:10	22 18:16
race	39:15	reflect	40:13	23:19,20
15:8,10,	42:3	17:1	43:20	25:2,9,
12,14,16	receiving	41:20	repeat	12,20
16:7,10,	9:24	42:1	7:19 8:1	26:4
13,16,21,	recent	reflected	39:8	35:24
23 25:25	25:18	23:12	repeating	36:1,2
26:15,18	recess	reflections	40:5	37:5
31:8,11	29:20	17:7	rephrase	38:17
37:23	recollectio	refresh	28:2	39:6,10
38:5,24	n	30:21	representat	44:6,23
39:14	17:19	region	ion	45:14,16,
46:3	30:22	12:15,16	18:15	21
race-based	record	23:23	23:24	responding
39:17	4:14 17:7	regional	28:18	4:5
race-	18:1	24:7	29:7 36:5	response
neutral	29:19	regionally	44:25	12:2
40:3,6	redistricti	23:21	representat	rest
rac	ng	registered	ive	18:16
26:6	19:13,18	20:24	36:22	35:12
racial	20:2	registratio	37:4	36:12
17:9	37:16	n	representat	44:25
26:23	39:19,21	17:20	ives	restate
37:22	40:8	relate	26:20	11:6 31:9
38:20	redlining		represented	35:7
read				

**MEIKO SEYMOUR
HODGES vs PASSIDOMO**

November 26, 2024

Index: resulted..St

resulted 19:14 39:18	sat 15:18	shaded 25:9 26:4,8,10	sitting 6:4	specialist 13:11
results 25:5	satisfy 10:2	shading 25:4	sliver 28:22	specific 14:25 21:8 34:4 44:10
review 6:2,11	school 8:12,18, 19	shape 41:24 42:1	social 16:3 20:5,8	specificall y 15:4 23:20
rights 14:14,18, 21	screen 21:25	share 21:24 38:22	sort 8:8,23 11:5,7 12:20 17:1,6,24 18:12,13, 15 24:7, 14,19 28:13,15, 19,21 39:3	spell 4:13 35:1
Robertson 6:6,13 18:25 22:7,25 27:1 28:7 29:15,18 30:3,18, 24 36:6, 16 38:11 41:6 43:22 44:9 45:7,22 46:7,10	scroll 39:16 43:14	sheet 17:25	split 28:19 29:1,4 37:10	split 28:19 29:1,4 37:10
	section 18:12,13 44:2	shoulder 28:21	splits 37:21,25 39:18	spoke 19:1 43:23
	sectioned 35:23,25	show 44:4,13 45:5,6	sorts 14:23 15:20	spoken 19:4,8,10
	sectioning 35:10,19	shown 45:9	sound 4:19	St 6:19 7:7 15:18 16:11 18:13,17 23:15,18, 19,20 24:4,8, 21,24,25 26:9 27:3 28:15,22 30:11 32:4,7,8, 9,14,20 33:8,9, 11,15,16, 19,22,25 34:3,6, 11,13,15
	sections 35:3	side 24:1,12, 22 25:22 27:4	sounds 38:23	
role 10:13	semesters 9:8	sign 18:1	south 6:19 7:6 24:21 25:2,12, 21 26:5 35:10,16, 19 36:12 39:6,10 41:16	
roughly 41:12	Seminary 8:19	signal 20:16	Southester n 10:5,6	
running 12:21 14:5,6	Senate 4:10	signed 18:3	speak 5:4	
s	sense 5:6 23:17 28:20 42:23	significanc e 4:24	speaking 11:20 15:20	
S-E-Y-M-O- U-R 4:15	separate 36:5	significant 17:5 38:17		
sac 21:9	severely 18:14	similar 31:5		
sacrificed 29:25 30:9,16	Seymour 4:1,4,9, 15 22:10 43:17	sit 45:19		

MEIKO SEYMOUR
HODGES vs PASSIDOMO

November 26, 2024

Index: staff..unsure

35:4,11, 16,19 36:12,13, 19,23 37:5 38:2 39:7,10, 14 41:8, 13,16,23 42:8,13, 17,19,20, 21 44:25 45:1 staff 19:19,23 26:17 stands 42:9 start 9:8 10:15 15:21 22:4 state 4:13 6:17 18:7 21:6,8, 10,11,15 23:8,10 33:1 statements 20:5,18 step 36:14 stock 25:19 stop 9:8 stories 15:19 story 16:5 stranger 16:3	street 7:8,9,15 16:3 stuff 39:22 support 13:8 supporters 10:22 supporting 34:18,21 sworn 4:5 <hr/> T <hr/> taking 4:11 5:16 9:25 talked 34:12 talking 5:5 Tampa 18:14 23:16,18, 21 24:5, 12,22 28:12,23 38:7 39:23 40:4 tasked 34:10 team 10:24 telling 18:19 tend 26:4,5	tending 44:4,13 45:5 terms 24:1 37:7 39:14 45:4 testified 17:16 testifies 4:6 testimony 4:24 5:14,20 35:6,21 39:5 Theology 8:15 thing 8:8 18:5 things 5:3 24:7 thinking 45:3 thought 9:21 Threads 20:10 tied 18:13 Tier 40:18,19 Tiktok 20:14 time 5:11 6:14 10:6 11:8 12:18 15:3 19:16	21:1 26:12 33:17 40:9,10, 14 times 25:19 title 13:10,16 today 4:11,24 5:14,20, 23,25 6:3,4,12 7:3 45:19 top 24:15 41:11,13, 25 42:11 topics 23:2 track 13:1 42:18 traditional 39:19 training 10:25 travel 8:23 9:4 truthful 5:14,20 turned 21:4 Twitter 20:12,13 Typically 32:12	<hr/> U <hr/> ultimate 36:3 unable 5:17 44:24 uncle 10:9 unclear 23:1 36:8 Uncommon 12:10,12, 13,14,17, 19 unconstitut ional 37:14 understand 4:23 31:3 understandi ng 15:3 39:6,9 unfair 28:15,18 unfairly 18:12 44:23 unique 24:4,23 29:6 41:23 University 10:6 unsure 30:19 38:18
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**MEIKO SEYMOUR
HODGES vs PASSIDOMO**November 26, 2024
Index: Valencia..zoom

	27:7,12	18:9 23:6
v	36:5,11	41:3,24
		44:12
Valencia	w	work
10:5		10:1
versus	wanted	13:12,14
24:10,21	23:7	14:10,20
25:21	warrant	15:1
VIDEOCONFER	17:23	worked
ENCE	water	14:2,4,8,
4:1	42:22	14
voice	ways	working
7:2	15:24,25	10:15
volunteer	16:6	11:9
14:11,20	week	12:3,7
16:7	4:17	13:2,4,19
vote	weeks	works
18:15	21:2	33:1
28:5,13,	weight	written
17 35:12	28:22	20:18
36:2	Weihmuller	wrong
37:4,8	46:12	39:4
44:24	Wendy	y
voted	46:9	
21:1,3,6,	west	year
14	26:7	7:18,21
voter	western	21:12
20:24	28:14	34:5
27:25	white	years
28:11	16:18	13:19
voters	witnesses	25:18
14:24	43:2,6	27:22
15:2 29:6	word	34:5
34:20,23	40:2	
35:6,11,	44:19	z
16,20	wording	
36:4,11,	28:1	ZIP
15	words	7:9
voters'	10:18	zoom
26:19		22:7
voting		
14:14		