

**In the Matter Of:**  
**HODGES vs PASSIDOMO**

8:24-cv-879

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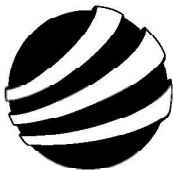
**MEIKO SEYMOUR**

*November 26, 2024*

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Defs. Ex.

139



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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  
17  
18  
19  
20  
21

22                   Examination of the witness taken before:

23                   Wendy E. Rivera, FPR  
24  
25

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APPEARANCES OF COUNSEL  
(Via Videoconference)

On behalf of the Plaintiffs:

NAOMI ROBERTSON, ESQUIRE  
and  
JAMES M. SHAW, JR., ESQUIRE  
Butler Weihmuller Katz Craig, LLP  
400 North Ashley Drive  
Suite 2300  
Tampa, Florida 33602  
P. (813) 281-1900  
Nrobertson@butler.legal  
jshaw@butler.legal

On behalf of the Defendants:

DENISE M. HARLE, ESQUIRE  
and  
LEILA S. OBERSCHALL, ESQUIRE  
Shutts & Bowen, LLP  
215 South Monroe Street  
Suite 804  
Tallahassee, Florida 32301  
P. (850) 241-1717  
Tprice@shutts.com

Also Present:

MONIQUA BUMOSKEY

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

WITNESS:      MEIKO SEYMOUR

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Direct Examination by Ms. Harle

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Certificate of Oath

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Certificate of Reporter

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Errata (to be forwarded upon execution)

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## 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

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Exhibit 2

Plaintiff's Rule 26  
Initial Disclosures

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1 VIDEOCONFERENCE DEPOSITION OF MEIKO SEYMOUR

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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?

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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,

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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?

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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?

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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

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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

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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.

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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



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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.

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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?

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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?

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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

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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

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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

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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

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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.



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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.

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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.

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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.

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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

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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

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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

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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?

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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 distinct, 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?



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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

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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.

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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

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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

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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

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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?

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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.

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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



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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.

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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

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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?

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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

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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

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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

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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.

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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.



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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

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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:

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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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## 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

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## 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 \_\_\_\_\_  
Wendy E. Rivera

25

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## 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

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