UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

CASE NUMBER: 1:21-CV-05337-SCJ

ALPHA PHI ALPHA FRATERNITY INC., a nonprofit organization on behalf of members residing in Georgia; SIXTH DISTRICT OF THE AFRICAN METHODIST EPISCOPAL CHURCH, a Georgia Nonprofit organization; ERIC T. WOODS; KATIE BAILEY GLENN; PHIL BROWN; JANICE STEWART, PLAINTIFFS,

V.

BRAD RAFFENSPERGER, in his official capacity as Secretary of State of Georgia, DEFENDANT.

DEPOSITION TESTIMONY OF:
Eric Woods
December 15, 2022

S T I P U L A T I O N S

IT IS STIPULATED AND AGREED by and between the parties through their respective counsel that the deposition of Eric Woods may be taken before Mallory B. Gray, CCR, RPR, a Court Reporter and Notary Public for the State at Large, via Zoom, on the 15th of December 2022, commencing at approximately 2:35 p.m.

IT IS FURTHER STIPULATED AND AGREED that the signature to and the reading of the deposition by the witness is not waived.

In accordance with Rule 5(d) of the Alabama Rules of Civil Procedure, as amended, effective May 15, 1998, I, Mallory B. Gray, am hereby delivering to Dan Weigel, the original transcript of the oral testimony taken the 15th of December 2022, along with the exhibit.

Please be advised that this is the same and not retained by the Court Reporter, nor filed with the Court.

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(Exhibits not received at transcript production)

A P P E A R A N C E S

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I, Mallory Bradberry Gray, a Court Reporter and Notary Public, State of Alabama at Large, acting as Commissioner, certify that on this date, pursuant to the Alabama Rules of Civil Procedure and the foregoing stipulation of counsel, there came before me via Zoom, commencing at approximately 2:35 p.m. On the 15th of December 2022, Eric Woods, witness in the above cause, for oral examination, whereupon the following proceedings were had:

MR. WEIGEL: So this will be the deposition of Eric Woods taken by Defendant, Secretary of State Brad Raffensperger, for the purpose of discovery and all purposes allowed under the Federal Rules of Civil Procedure.

Appearing for Secretary of State, Brad Raffensperger, I'm Dan Weigel for the law firm Taylor English Duma, and I will let

counsel for Mr. Woods --

MS. WILLIAMS: Ayana Williams from WilmerHale representing Mr. Woods. I'm joined by Cassie Mitchell also from WilmerHale, also in the room with us.

MS. TSAI: This is Denise Tsai, also from WilmerHale, representing Mr. Woods and the Alpha Phi Alpha Plaintiffs.

MR. MILLER: And I'm Alex Miller, again, from WilmerHale representing Mr. Woods.

MR. WEIGEL: Awesome. And if the court reporter could please swear in the witness.

(Witness sworn.)

ERIC T. WOODS

was sworn (affirmed) and testified as follows:

MR. WEIGEL: Awesome. I think we're ready then.

EXAMINATION

BY MR. WEIGEL:

Q. Mr. Woods, the purpose of this

1 deposition is not to confuse you, so if I ask
2 a question that you don't understand or I
3 phrase it poorly or any other thing that you
4 need clarification with as far as the
5 question goes, just let me know, and I'll do
6 my best to make the -- rephrase the question
7 so that you can better understand it.
8 And since this is a virtual
9 deposition, there will likely be some audio
10 issues that we encounter for the court
11 reporter, so it's going to be important that
12 we do a couple things.
13 First, do your best to speak clearly
14 and loudly so that the court reporter can
15 hear you.
16 And, second, especially with
17 yes-or-no answers where your instinct may be
18 to nod or give an uh-huh, be sure to say yes
19 or no audibly.
20 And, finally, we have to both do our
21 best to not speak over each other or cut each
22 other off. So even if I'm asking a question
23 that you probably know the answer to, make

sure I finish the question before you start your answer. And I'll also do my best to wait until you complete your answer before I start on to the next question.

Similarly, if I ask a question and your attorney has an objection, be sure to let your attorney state the objection before starting your answer so that the record remains clear.

Are you good with that, Mr. Woods?

A. Yes.

Q. Awesome. Also, if you need a break at any time, please just let me know. The only thing that I'm going to ask is that if I've already asked a question, please go ahead and complete your answer to that question I pose before we take a break.

And, finally, with this being a virtual deposition, it is important that we confirm that you don't have any electronic devices out and open for you to see during the deposition. This is going to include your cell phone, so please make sure you have

that off or silenced, as well as e-mail on your computer or laptop.

Again, with this being a virtual deposition, obviously, you're going to need to have the Zoom open. And if I introduce any exhibits for you to look at, you will also need to look at those.

But if you could go ahead and confirm and agree that anything of the nature I described earlier, so your phone or e-mail, will not be open during this deposition, that will be great.

Can you confirm that for me, Mr. Woods?

A. It's currently not open, but I want to -- I would like a second to turn the volume all the way off.

Q. Perfect. Yeah. Absolutely.

All right. Are you ready, Mr. Woods?

A. Yes, sir, I am.

Q. So we're going to start off with what's going to be marked as Defendant's

Exhibit 1 for this deposition. I'm going to do my best to share the screen. Of course, I've already had my electronic issues, so hopefully I've gotten those out of the way. So I'm going to share my screen right now.

Mr. Woods, can you see my screen?

A. Yes.

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

Q. Do you see the document on the screen that is titled Defendant's Notice to Take the Deposition of Eric T. Woods?

A. Yes, I do.

Q. And if you can just follow along with me as I quickly scroll through this document. It's a pretty short one.

Now, Mr. Woods, are you familiar with this document as the version you received in connection with this deposition?

A. Yes.

Q. Perfect. Now we'll stop sharing that. Thank you.

And, Mr. Woods, we'll also start off

this deposition by asking have you ever given any testimony prior to this in a lawsuit, whether at a deposition or at, in a trial?

A. No.

Q. And have you taken any medications that would you keep you from fully and truthfully participating in today's deposition?

A. No.

Q. And do you have any medical conditions that would you keep you from fully and truthfully participating in today's deposition?

A. No.

Q. Shifting gears again, have you ever filed any election-related lawsuits in the past?

A. No.

Q. And are you aware of any direct family members of yours that have filed election-related lawsuits in the past?

A. No.

Q. Mr. Woods, have you ever been

charged with a crime?
A. No.
Q. Ever been arrested?
A. No.
Q. And I assume, based on those answers, that you've never been convicted for a crime either?
A. No.
Q. Have you discussed this case with anyone other than your lawyer?
A. No.
Q. Have you discussed the deposition with anyone other than your lawyer?
A. No.
Q. Did you review anything to prepare for this deposition?
A. No.
Q. And do you have any documents or notes with you today?
A. No.
Q. All right. Moving right along. All right. We'll shift gears again.
Now, Mr. Woods, one more time, could

you please state your full name for the record?

A. Eric T. Woods.

Q. And, Mr. Woods, what is your current address?

A. [redacted] Tyrone, Georgia [redacted].

Q. And what county is that in?

A. Fayette County.

Q. How long have you lived at that address?

A. Going on 15 years now.

Q. And have you lived at any other address in the past two years?

A. No.

Q. Before moving to your current address 15 years ago, where did you live before that?

A. I was in Jonesboro, Georgia.

Q. And how long did you live in Jonesboro?

A. On and off for about maybe seven years. I was -- I was stationed at Great

Lakes Naval Base in conjunction with having that as a home of record.

Q. And have you ever lived anywhere else in Georgia other than the ones you've mentioned, so Jonesboro and your current address in Tyrone?

A. Thirty years ago, I lived in Columbus, Georgia, Fort Benning.

Q. And you noted that -- when you were living in Jonesboro on and off.

Was there a specific other location that you would live when you were not there or was it just in connection with your military service at that time?

A. In connection with military service, deployments.

Q. Okay. Just wanted that clarification.

And, Mr. Woods, since this deposition is occurring virtually, can you provide the address from which you are sitting and testifying?

A. 1100 Spring Street Northwest,

Atlanta, Georgia, I believe 30330 or 30331, one of the two.

Q. Is it your attorneys' office?

A. It's the office of the ACLU.

Q. Okay. And, obviously, I can see that your lawyer is present in the room with you, but is there anyone else who is present in the room?

A. Yes, the other -- Kathleen --

MS. MITCHELL: Cassie.

THE WITNESS: Cassie.

Q. (By Mr. Weigel) So everyone is on the call. Okay. Great.

And going back to your addresses real fast, do you own either partially or full any other properties?

A. No.

Q. And do you rent anywhere else?

A. No, I do not.

Q. Have you owned any other rental properties in the last two years?

A. No.

Q. So the residence you've identified

in Tyrone, Georgia is the sole residence that you have had in the last two years?

A. Yes.

Q. We will shift gears a little bit and talk about your education.

What was the highest level of education that you completed?

A. A master's degree.

Q. What was that master's degree in?

A. Human resources.

Q. And when did you complete that degree?

A. 1998.

Q. And where did you complete that degree?

A. Troy State University.

Q. I think I know where Troy State is, but if you could let me know where Troy State is real fast.

A. Yeah. Troy, Alabama.

Q. Troy, Alabama. That's fine.

And other than your master's, what is the next highest level of education that

you completed?
A. Managerial Staff College.
Q. And I assume that was in connection with your military experience.
Would that be accurate?
A. Yes, sir.
Q. And do you know around the proximate -- approximate time that you completed that?
A. 1996.
Q. And then just keep going back. Any other -- the next -- excuse me. Strike that.
The next highest level of education other than that?
A. Bachelor's degree.
Q. In what field?
A. Liberal arts.
Q. And where did you receive that degree from?
A. Central State University.
Q. Around what time did you receive that degree?
A. 1988.

Q. Did you attend any other colleges or was that the only one?
A. That was it. That was the only one.
Q. And what year did you graduate high school?
A. 1984.
Q. Can you give me the city and state where you graduated high school?
A. Detroit, Michigan.
Q. And do you hold any licenses or certifications presently or in the past?
A. Let's see.
I'm -- no.
Q. Okay. How about any other vocational training aside from in connection with what we've already talked about?
A. All military related, so I'll say no. None civilian related.
Q. So would there be any specific military-related certifications or training, licenses that come to mind?
A. Could you -- when you say "certifications," I'll say no for

certifications.

Q. Okay. That was a little bit of a vague question. Sorry about that.

And right now, do you receive continuing education in any area?

A. Yes.

Q. And what is that?

A. It would be Homeland Security exercises, plans and exercises.

Q. And how often do you receive continuing education in that area?

A. Annually.

Q. Annually.

And where do you receive that?

A. Online.

Q. And, currently, we -- we covered it a little bit, but just to confirm, aside from what we've already discussed or talked about, do you currently receive training in any other field or area?

A. No.

Q. All right. We'll move along to talk about any organizations you're currently

involved in.

Are you currently a member of any social organizations?

A. Yes.

Q. And what are those?

A. I'm a member of Omega Psi Phi Fraternity.

Q. And how long have you been a member?

A. Thirty-six years.

Q. Do you presently have any specific role in the organization or are you just a member right now?

A. Just a member.

Q. And in those 36 years of being in the organization, have you ever had any other role other than a member?

A. Yes.

Q. And what is that?

A. Chapter president.

Q. Do you know around what time period you were the chapter president?

A. 2008, 2009.

Q. How about any political

organizations are you -- that you are involved in right now?

A. None. No political organizations, no.

Q. Any activist organizations you're currently involved in?

A. Can you define "activist organizations"?

Q. An organization that's stated mission is to achieve some sort of social goal, I would say.

A. No.

Q. And in the past, organizations that you're not currently involved in but have been involved in before?

A. Could you rephrase the question and make sure I understand? Are you specifically asking if I have been a member of a political organization?

Q. Oh, no, just going back to the general organizations that you've been involved in in the past.

A. Omega Psi Phi Fraternity.

Yeah, that's pretty much the only one that you're going to find on record.

Q. Okay.

A. Dues paying, yeah.

Q. Going back to college, would the answer be the same, that that's been the organization you've been involved in?

A. Yes.

Q. And to high school as well; can you recall any organizations that you were involved in in high school?

A. No, none.

Q. Now we'll shift again, and we've touched on this a little bit prior to this, but now we're going to talk about your employment currently and your employment history.

Where do you currently work?

A. Center for Disease Control and Prevention.

Q. And I assume that's the office in Atlanta, correct?

A. Yes.

Q. And what is your job title?
A. Emergency management specialist.
Q. What type of job duties go along with that position?
A. Emergency management planning.
Q. And how long have you held that current position?
A. One year.
Q. What employment did you have before starting that position?
A. US Army.
Q. How long were you in the US Army for?
A. Twenty-six years.
Q. And during the time in the Army, did you have a specific role the entire time or were they different roles that changed over time?
A. Different roles that changed over time.
Q. Okay. And if you just want to -- you know, we don't have to go line by line with the specifics. But if you just want to

1 give me a quick background on, you know, what
2 that would be, that would be great.
3 A. Army intelligence.
4 Q. And is it fair to say that you left
5 the Army just because you retired?
6 A. Yes, retirement.
7 Q. And did you have any job before
8 joining the Army?
9 A. No.
10 Q. All right. Shift a little bit again
11 closer to the subject matter of the case and
12 specifically your voter history.
13 Are you registered to vote in
14 Georgia?
15 A. Yes.
16 Q. And where did you register to vote?
17 A. I'm sorry. You faded out. Could
18 you repeat --
19 Q. Yeah.
20 Where did you register to vote?
21 Sorry.
22 A. Fayette County.
23 Q. And when did you register?

A. 2011, I believe, was the latest registration.
Q. Have you registered anywhere else to vote in Georgia?
A. Not that I recall.
Q. What about in any other states; have you ever been registered to vote in any other states?
A. Not that I recall. I -- man, that's a lot of states.
Q. And are you registered to vote at the current address that you identified earlier?
A. Yes, sir.
Q. Do you know what voting district you presently reside in?
A. Yes.
Q. And what is that?
A. 64.
Q. Have you voted in each election since you've been registered to vote in Georgia?
A. Yes.

Q. And we'll go through some categories.

So every presidential primary?

A. Yes.

Q. Every Georgia primary?

A. As far as I can recall, I haven't missed since 2011.

Q. In every general election?

A. Yes.

Q. In every special election?

A. Yes.

Q. In this past general election, so November 2022, do you recall what precinct you voted in?

A. Yes, my current precinct by -- I just remember the location. Yes.

Location-wise, I remember. As far as what number, I don't remember what -- what precinct that is.

Q. If you just want to -- could you just generally describe where you voted, basically?

A. Hopewell Baptist Church is my voting

and polling.
Q. And how about where you voted for the runoff; same place?
A. No, they -- it was a switch. So the runoff was at the old Tyrone police station, which is about a 50-year-old building with no running toilets.
Q. We touched on this a little bit with registration, but have you ever voted in any other state?
A. I'm going to say no, to give you -- I'm going to say no.
Q. And do you consider yourself to be a member of the Democratic party?
A. Yes.
Q. And for how long would you say -- consider yourself to be a member of the Democratic Party?
A. Since I was 18.
Q. Have you ever held any leadership positions in the Democratic Party?
A. No, sir.
Q. And have you ever held any position

or served on any committee for the Democratic Party?

A. No, sir.

Q. And have you participated in any activities of the Democratic Party?

A. I'm sorry. You faded out again. Could you --

Q. Yes.

Have you ever participated in any activities for the Democratic Party?

A. Yes.

Q. And could you just describe briefly what those activities have been?

A. Yes. Voter registration.

Q. And how often would you say you participated in those activities?

A. Maybe every other election. There were several where I was deployed, so...

Q. And I presume, based on your prior answer, that this will be in the negative, but have you ever considered yourself to be a member of the Republican Party?

A. No, sir.

Q. And would it be fair to say that you generally support Democratic candidates for election in Georgia?
A. Yes, sir.
Q. Have you ever voted for a Republican candidate?
A. No, sir.
Q. And, again, you probably answered this with your prior answers, but have you ever been a member, held a position, in any other political party?
A. No, sir.
Q. Have you worked on any political campaigns?
A. If you mean have I passed out flyers for prior Democratic presidents, yes.
Q. Yes, so for a specific candidate that you could point to and say, I helped on that campaign?
A. Yes, the Obama campaign.
Q. And would that have been in both -- both elections that he ran?
A. Yes.

Q. 2008 and 2012?
A. Yes.
Q. And you mentioned it was handing out flyers.
Were there any other activities that you did helping out on the campaign?
A. No.
Q. And have you had any involvement with voter advocacy groups?
A. I'm going to say no. No.
Q. Moving right along, now we're going to get into more specifics with this lawsuit.
How did you first hear about the lawsuit that we're here for today?
A. I believe I first heard about it via local media.
Q. And can you describe what type of, I guess, content that you saw in the local media in connection with this lawsuit?
A. Yeah, it was -- it was a segment, if you would, on Channel 11, I believe, describing what was going on in Fayette County at the time.

Q. So it was a local news story that you saw first?
A. Yes.
Q. And then as far as specifically getting involved in the lawsuit after you saw that, how did that occur?
A. Yeah. There -- at a -- at one of the Fayette County Democratic Committee meetings, a member of -- of the Fayette County Democratic Committee asked me would I be interested in fighting the issue, and I said yes.
Q. And then what happened after that? And, of course, as I kind of move along in these questions, I'm not trying to get into anything that you had as far as personal conversations or the nature and content of conversations you had with the attorneys you eventually hired or anything like that. I'm just looking for the facts and circumstances.
So following that, did you get in contact with someone or did someone get in contact with you?

A. I initially contacted -- the lawyer, I believe, at the time was Rahul Jerardo, Gerardo (phonetic), I believe, if I'm saying his name right.

Q. Moving along. Prior to this lawsuit and prior to the current redistricting that is the subject matter of this lawsuit, were you satisfied with how the districts had been drawn previously in Georgia?

A. Could you restate that question?

Q. Yes. Sorry if I -- it's a little bit of a complicated -- complicated phrasing.

So there was a process by which the Georgia legislature made new districts, and that's the subject matter of the lawsuit, prior to that; so prior to how the districts are current drawn, that is the subject of the lawsuit.

Were you satisfied with the previous way that the districts were drawn?

A. I -- okay. I can only answer that in this way, you know, I -- there have been several redrawings of the districts in

Fayette County, so I don't know -- there's been so many.

So all I know is prior to the current restricting that shrunk my district, there -- there wasn't as big as an issue, but that was the second shrinking of that district. That's the best way I can answer that question.

Q. And you mentioned, you know, obviously, that there were several redrawings in the past, but do you recall you -- you identified a first shrinking. Do you recall when that was?

A. No, I do not. I don't remember the exact dates.

Q. So would it be fair to say that your involvement in the lawsuit came about because of this kind of specific concern with the way your district had shrunk even further?

A. That's correct.

Q. So did you have an opinion about or do have you an opinion about the way that the district -- redistricting process generally

applied across Georgia?
A. I can't speak for all of Georgia. I don't -- I don't -- I couldn't speak for all of Georgia.
Q. And then moving on with that, what's your overall goal with the lawsuit?
A. Fairness, equity, inclusion, diversity.
Q. And then specifically with your district that you identified, do you have any specific goals as it relates to your specific district?
A. Only to be well represented.
Q. And shifting a little bit and touching on what we discussed earlier, did you do any research about the issues in this case aside from -- you mentioned the local news report and then the meeting that you attended.
Did you do any research outside of that?
A. No, I did not. I did not -- no.
Q. And did you do any research

concerning your attorneys in this case prior to reaching out to them?

A. No, I did not.

Q. And, again, I want to make sure I say not to reveal any privileged communications, the subject -- the nature and content of any communication you've had with your attorney, but do you know what type of contract, if any, you signed with your attorneys in this case?

A. Contract? Could you be more specific? I mean, I -- could you rephrase that question?

Q. Yes.

So as far as you reaching a point where you were represented by your attorneys in this case and in this lawsuit, do you know what type of contract you would've signed, again, if any, to have that representation occur?

A. The only contract that I signed is a contract for the ACLU/William and Hurt to represent me in this --

Q. Okay.
A. -- in this lawsuit. That's it.
Q. Okay. And that's completely fine.
And I assume that occurred after what we discussed earlier where you reached out to your counsel over the phone and then you signed what you just described, correct?
A. Yes, sir.
Q. Do you know how your lawyers are being paid in this matter?
A. No, I do not --
Q. And have you yourself been paid or received anything of value in exchange for your participation as a Plaintiff in this lawsuit?
A. No, sir.
MR. WEIGEL: Before we shift gears again, Mr. Woods, I just want to check in real fast.
Are you doing okay? Do you need a break or anything or do you want to keep going?
THE WITNESS: No, sir. Let's roll.

MR. WEIGEL: Okay. Sounds great.
(Whereupon, Defendant's Exhibit No. 2 was marked for identification.)
Q. (By Mr. Weigel) So what I'm going to do now is I will share my screen again and bring up what will be marked as Defendant's Exhibit 2.
Is this -- showing up on your screen, there's going to be something that says introduction right in the middle of the page, Mr. Woods.
A. Yes, sir.
Q. Do you see that? Great.
Now, I will be scrolling down to what is paragraph 19 of this document, which is Plaintiffs' Amended Complaint. And looks like it's all on page 9, so once I get there -- do you see the paragraph that starts with, Plaintiff Eric T. Woods?
A. Yes, sir.
Q. And if you could just quickly to yourself, not out loud, read through that paragraph and let me know when you're

finished going through it.
A. I'm done with those two paragraphs.
Q. Okay. And do you recognize the allegations that are contained in this paragraph of the Complaint?
A. Yes, sir, I do.
Q. And is all that information in this paragraph accurate as it relates to you?
A. Yes, sir, it is.
Q. And stepping back a little bit, do you recognize this document overall as the Complaint that your attorneys filed in this action?
A. Yes, sir, I do.
Q. All right. Great. And I will stop sharing real fast.
Now, we touched on this a little bit earlier, and it was in the paragraph you just read, but you reside in state Senate District 16; is that correct?
A. If that is the current new district.
Q. Yes.
A. Yes.

Q. And you mentioned that you voted in the 2022 general election, correct?
A. Yes.
Q. And did the candidate you voted for in that election in your state Senate District succeed?
A. For -- for which office?
Q. State Senate 16.
A. No.
Q. How about in the last election that you voted for in state Senate District 16 prior to the redistricting; did you vote in that election?
A. Yes.
Q. And do you recall if the candidate that you preferred and voted for in that election won?
A. No.
Q. Shifting back a little bit, as far as the redistricting process that occurred, did you reach out to any legislator during the 2021 special session concerning the redistricting issues that were raised in your

Complaint?
A. I reached out to and started speaking with the current town council when it came to the redistricting.
Q. And with your current town council, do you recall who you specifically reached out to?
A. It -- there was -- it was at a council meeting, so it would've been a council at large.
Q. So would it be fair to characterize that as kind of the portion of the meeting where concerned citizens get up and speak about issues?
A. That's correct.
Q. And aside from that, that answer may have -- may have covered the next question that I'm going to ask, but I'll go through them anyway.
Did you testify in the Georgia Assembly on the issues or any issues pertaining to redistricting in 2021?
A. No.

Q. And did you attend any hearings in the Georgia legislature pertaining to redistricting?

A. No.

Q. And aside from the one that you identified, did you attend any other meetings concerning redistricting in 2021?

A. No.

Q. Right now, we're going to talk about a phrase that's referred to as "community of interest."

Mr. Woods, do you have an understanding of what this phrase means, "community of interest"?

A. I have my understanding, is that it is, you know, depending on what day of the week it is, whether it's District 16 or 64. That's -- that is my understanding.

Q. And how would you describe your community generally, the community that you live in?

A. Predominately educated African Americans pretty much residing in Tyrone,

north Fayette, and along Highway 74 in Tyrone.

Q. And what would you say are the most important issues or concerns to that community that you just described?

A. Yeah, gerrymandering.

Q. And can you describe just a little bit further what your concerns are with that topic?

A. Yes, being unable to see someone truly elected that represents the community that is currently in question, someone in our community that wants to represent us.

Q. Moving back a little bit to your community involvement, do you or have you participated in any neighborhood or community associations?

A. Yes.

Q. And what are those?

A. The -- what's the name of my subdivision? -- oh, the River Crest Homeowners Association.

Q. And how long have you been a member

of that association?
A. Going on 15 years.
Q. Do you have any specific leadership role with that association?
A. No.
Q. Have you ever had a leadership role?
A. Yes.
Q. And what is that?
A. President.
Q. And how would you describe your role and involvement presently as a member of this association?
A. An active, concerned citizen of the community.
Q. And are you currently a member of any faith-based organization?
A. Faith-based? No.
Q. When I ask that question, that includes, you know, churches.
So you don't currently attend services at any church?
A. No specific church, no.
Q. And are you involved in any school

associations or activities?
A. If you -- if you include elementary school for my daughter.
Q. Yeah, I do.
So what is your involvement with that?
A. A participating parent, help out in the classes, bring snacks and treats.
Oh, I'm also a member of the -- what do they call it? -- oh, the West Point Parent Club.
Q. What does that club do?
A. Support the -- our sons and daughters that attend the United States Military Academy at West Point.
Q. How about any other associations or activities; are you currently a member of any fraternities?
A. Yes, I stated that earlier. Yes.
Q. Okay. So earlier one.
And so aside from the ones we covered, any other civic organizations or anything of that nature that you're involved

in right now?
A. No, sir.
Q. And outside of the organizations that you're involved in, obviously, you have a daughter too, is there any other socializing that you participate in in your community on a regular basis?
A. The homeowners association meetings.
Q. And those are the ones we covered previously, correct?
A. Yes, yes.
Q. Looks like we can move right along. And at this point, we're going to get into sort of specific questions dealing with the legal claims in the lawsuit, and I'll just quickly go through these and expand on them as necessary, depending on your answers.
So we'll start off with, Mr. Woods, have you ever been prohibited from registering to vote based on your race?
A. No.
Q. And have you ever been prohibited from participating in the political process

based on your race?
A. No.
Q. And do you have any personal knowledge of discrimination by the Government of Georgia against members of a minority group related to participation in the democratic process?
A. Would that include acts or changing locations prior to, you know -- you know, acts or changing locations, your voting location, not giving enough time to let the community react?
Q. Yes, I would include that. So if you want to go into that any further, go ahead.
A. Yeah. Well, in the town of Tyrone, the voting location, you know, has shifted on more than one occasion, and we've been prevented from voting inside of the town hall, which is, I'll just say, massive in square feet and allows -- and it also would allow spacing, if you will, social distancing.

And we've been relegated now to a very small building, roughly 1,200 square feet, to where they had to bring in porta-potties, and we had to stand in line and watch the elderly and other people of minority be regulated to using these porta-potties in the cold during this past election.

Q. And you might have just mentioned it a little bit.

So do you recall when this change occurred?

A. I don't remember the -- no. To answer your question, no, I don't remember the exact date. All I know is all of a sudden, the town hall, which would've supported the number of people, was -- was taken off the table for voting, and we were regulated to a very small building.

Q. And, again, you know, only if you know, do you recall the process or circumstances that -- that led to this change?

A. No, I do not.
Q. And are there any other specific things or -- that you have personal knowledge of that you would point to as discrimination similar to that?
A. That is the only one I can clearly identify and define.
Q. Moving on again. And this is, again, going to be a phrase, and just let me know, similar to before -- similar to before, if you know exactly what it means and -- or if you just want to generally answer the question, but do you know what the phrase "racially polarized voting" means?
A. I'm going to say no because I know what my definition of racial polarized voting is, and I don't want to guess in this instance, so...
Q. So what is your definition of it then?
A. My definition of "racially polarized" is -- is not allowing for -- I'll just use my current district as an example --

to be able to promote and put forth a very qualified candidate and for that candidate to -- to be placed in a position where they could win and represent my district.

There's -- there's always been gerrymandering to reduce the possibility of a candidate to represent my district fairly, and it always has leaned to giving more power to the Republican candidate.

Q. And, again, correct me if I'm wrong, but, you know, just based on our discussion, you would -- it would be fair to say that you kind of put the explanation for that on your definition of the phrase "racially polarized voting."

Would that be --

A. Yes. My definition.

Q. And, again, just to go back a little bit to clarify, would you characterize this as something that has occurred and been a reality as you've described it over time and it's just kind of crystallized now with the redistricting process? Would that be

accurate?
A. Yes, that would be accurate.
Q. And in your opinion, do black voters in Georgia generally vote for Democratic candidates?
A. I would say yes.
Q. And do you personally know any black voters that have told you that they voted for Republican candidates?
A. No, I do not.
Q. And do you know if Georgia uses a majority vote requirement in its elections?
A. I can't say that I specifically know the rules, regulations of the voting in Georgia, so I'm going to -- I'm going to -- I'm going to defer from that question because Georgia is, you know, one of the only few states that still uses the -- the -- you know, the 51 percent rule, which is antiquated.
So I'm going to say no.
Q. So, yes, and that's what that question gets to a little bit. And, again,

you've kind of described the answer to this.
But do you recall why the special runoff election that just occurred between Raphael Warnock and Herschel Walker, do you know why that occurred?
A. Neither one, according to the rules in Georgia, received a 51 percent majority.
Q. And you voted in that special runoff election, correct?
A. Yes, sir.
Q. And it's fair to say that you voted for Senator Warnock, correct?
A. I did.
Q. And, again, moving on to another phrase, do you know what the phrase -- or the term, excuse me, sorry -- the term "candidate-slating process," what that means as it relates to elections?
A. No, I do not.
Q. So then it would be fair to say that you do not know whether there is a candidate-slating process in Georgia?
A. I do not.

Q. Moving along. Mr. Woods, has a lack of education kept you from participating in Georgia elections?
A. Me personally? No.
Q. And has a lack of employment opportunities kept you from participating in Georgia elections?
A. No.
Q. How about a lack of access to adequate health services; has that kept you from participating in Georgia elections?
A. No.
Q. Are you aware of the term "racial appeals" as that is used in the context of elections in campaigning?
A. I'm not aware of the legal term, no.
Q. And have you personally seen campaigns in Georgia that you would characterize as constituting racial appeals?
A. No.
Q. Do you know how many black people have run for office in Georgia?
A. No, I do not.

Q. And similar to that, do you know how many black people have been elected to public office in Georgia?

A. No, I do not.

Q. Looks like we're almost finishing up, and I'm just broadly asking this question.

Are you aware of any needs of the minor community in Georgia that, in your opinion, differ from those of white residents?

A. Absolutely.

Q. And what would you describe those as?

A. Where do you want me to start? Health care?

Q. Anywhere you want.

A. You know, I'll just -- I'll just go with health care, access to, education, and -- health care, education, access to, I'll say, food distribution sites, i.e., supermarkets, being present in certain low-income areas, or lack thereof.

So I'll stick with those big three.
Q. And then as far as particular needs of the minority community in Georgia, it would be fair to characterize that as similar to what you just described, so, you know, two sides of the same coin.
Would that be fair to say?
A. Could you specify exactly what --
Q. Sorry. Yeah. My phrasing was a little poor.
So the question you just answered was based on the needs differing from those of white residents, and now I'm just asking needs of the minority community generally.
A. Yes. Well, to be more specific with your question, if I understand what you're saying, because there -- I'm just using Georgia -- as you said, there are certain districts in Georgia that are poor white that have that access, i.e., Marjorie Taylor Green's district.
So I can only speak for those districts in or around the metro Atlanta area

that I know. There are some food deserts, health care is an issue, and definitely education.

Q. And as far as those needs that you've identified, what do you base that -- those specific needs on? Has it been personal experience that you have or anecdotal experience or reading about it? What do you base those needs on?

A. I would say two-fold. Maybe the Atlanta Journal-Constitution and its coverage of -- of some of the needs and the minorities and my own personal experience as I volunteer to pass out baskets with the fraternity to give away scholarships, et cetera.

MR. WEIGEL: All right. Well, Mr. Woods, that -- I'm fairly certain that that completes my questioning for now.

Counsel, I didn't know if you had any questions you wanted to get on the record for Mr. Woods or if you needed a break to kind of go through everything, so just let me know what works best for you.

MS. WILLIAMS: Yeah, could we take a quick five-minute break --

MR. WEIGEL: Yeah, that sounds great.

MS. WILLIAMS: I may have a couple quick questions on redirect, but --

MR. WEIGEL: Okay. So we'll go off the record now, meet up 4:45. Does that sound okay?

MS. WILLIAMS: That sounds good. Thank you.

(Short recess.)

MR. WEIGEL: All right. So back on the record.

So, Counsel, do you have any further questions you want to go over?

MS. WILLIAMS: Yeah, just a couple redirect questions to go through with Mr. Woods.

EXAMINATION

BY MS. WILLIAMS:

Q. So earlier, Mr. Weigel -- I hope I pronounced that right -- asked you if you had

done anything to prepare for this deposition.
Did you -- did you have any phone calls, perhaps, to prepare for this deposition?
A. I did. Last Thursday, I did receive a call from some Wile and Hale or Hill and --
Q. Close enough.
A. I did receive a call from that firm, yes.
Q. Okay. And Mr. Weigel asked you earlier whether you voted elsewhere.
Do you recall ever voting in another state?
A. No, I -- no, I -- I don't -- I don't recall.
Q. Okay. And he also asked you earlier if you'd ever been deposed.
Do you need to add on that?
A. Yeah. I -- I was -- I don't know if it's called being deposed in the military because of -- you know, 20 years ago, I was called in under a case under the Uniform Code of Military Justice to defend a naval

officer. So I was questioned by -- it would've been counsel for the military.

But that is the only question I received, never in a -- what do you call it? -- I guess a civil court, civilian court.

Q. Okay. Thank you.

MS. WILLIAMS: That's all I had for --

MR. WEIGEL: Okay. Thank you. I'll just have a few quick follow-ups just to bookend those questions.

FURTHER EXAMINATION

BY MR. WEIGEL:

Q. So, Mr. Woods, aside from the conversation that you had with your attorneys last Thursday, it's fair to say that that was the only thing that you did in preparation for this deposition; is that right?

A. Yes. Yes.

Q. And similar form of my next question, aside from testifying in what I believe you characterized as a military tribunal proceeding with a naval officer,

there are no other times where you've been deposed or testified in a matter prior to today?

A. No.

MR. WEIGEL: All right. Well, that finishes my questioning. Thank you again, Mr. Woods, for taking the time to speak with us today. I really appreciate your time on this matter.

Counsel, just real quick to -- while we are still on the record. I don't know if I covered this at the beginning, but it was agreeable that we would reserve all objections in this matter until either -- with the -- until the trial in this matter, the first use, with the exception of the form of the question or responsiveness of the answer. I assume we didn't have issues with that, but just to get that on the record.

Is that agreeable?

MS. WILLIAMS: Agreed.

MR. WEIGEL: And then just now that we're completed, I assume that you will be

reserving signature until review of the deposition transcript, correct?

MS. WILLIAMS: That's correct.

MR. WEIGEL: All right. I believe that completes the deposition, and we are off the record.

FURTHER DEPONENT SAITH NOT

CERTIFICATE

STATE OF ALABAMA)
) ss:
COUNTY OF MARSHALL)

I hereby certify that the above and foregoing proceeding was taken down by me by stenographic means, and that the content herein was produced in transcript form by computer aid under my supervision, and that the foregoing represents, to the best of my ability, a true and correct transcript of the proceedings occurring on said date at said time.

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

/s/Mallory B. Gray
Mallory B. Gray, CCR
CCR #558, Expires 9/30/2023
Commissioner for the
State of Alabama at Large
Notary Public, Expires 02/23

Ayana Williams
Ayana.Williams@wilmerhale.com

January 10, 2023

RE: Alpha Phi Alpha Fraternity, Inc. v. Raffensperger, Brad
12/15/2022, Eric Woods (#5618951)

The above-referenced transcript is available for review.

Within the applicable timeframe, the witness should read the testimony to verify its accuracy. If there are any changes, the witness should note those with the reason, on the attached Errata Sheet.

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ACKNOWLEDGEMENT OF DEPONENT

I, Eric Woods, do hereby declare that I have read the foregoing transcript, I have made any corrections, additions, or changes I deemed necessary as noted above to be appended hereto, and that the same is a true, correct and complete transcript of the testimony given by me.

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Georgia Code

Title 9, Chapter 11

Article 5, Section 9-11-30

(e) Review by witness; changes; signing.

If requested by the deponent or a party before completion of the deposition, the deponent shall have 30 days after being notified by the officer that the transcript or recording is available in which to review the transcript or recording and, if there are changes in form or substance, to sign a statement reciting such changes and the reasons given by the deponent for making them. The officer shall indicate in the certificate prescribed by paragraph (1) of subsection (f) of this Code section whether any review was requested and, if so, shall append any changes made by the deponent during the period allowed. If the deposition is not reviewed and signed by the witness within 30 days of its submission to him or her, the officer shall sign it and state on the record that the deposition was not reviewed and signed by the deponent within 30 days. The deposition may then be used as fully as though signed unless, on a motion to suppress under paragraph (4) of subsection (d) of Code

Section 9-11-32, the court holds that the reasons given for the refusal to sign require rejection of the deposition in whole or in part.

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1 Alpha Phi Alpha Fraternity, Inc. v. Raffensperger, Brad
2 Eric Woods (#5618951)
3 E R R A T A S H E E T
4 PAGE 33 LINE 4 CHANGE "RESTRICTING" TO
5 "REDISTRICTING"
6 REASON CORRECTING SCRIVENER'S ERROR
7 PAGE 47 LINE 6 CHANGE "REGULATED" TO
8 "RELEGATED"
9 REASON CORRECTING SCRIVENER'S ERROR
10 PAGE 47 LINE 19 CHANGE "REGULATED" TO
11 "RELEGATED"
12 REASON CORRECTING SCRIVENER'S ERROR
13 PAGE 53 LINE 9 CHANGE "MINOR" TO "MINORITY"
14
15 REASON CORRECTING SCRIVENER'S ERROR
16 PAGE _____ LINE _____ CHANGE _____
17
18 REASON _____
19 PAGE _____ LINE _____ CHANGE _____
20
21 REASON _____
22
23 Eric Woods 3/2/23
24 Eric Woods Date
25

1 Alpha Phi Alpha Fraternity, Inc. v. Raffensperger, Brad
2 Eric Woods (#5618951)
3 ACKNOWLEDGEMENT OF DEPONENT
4 I, Eric Woods, do hereby declare that I
5 have read the foregoing transcript, I have made any
6 corrections, additions, or changes I deemed necessary as
7 noted above to be appended hereto, and that the same is
8 a true, correct and complete transcript of the testimony
9 given by me.
10
11 Eric Woods _____ 3/2/23
12 Eric Woods Date
13 *If notary is required
14 SUBSCRIBED AND SWORN TO BEFORE ME THIS
15 2 DAY OF march, 2023.
16 CARLA L ELDER NOTARY EXPIRES GEORGIA November 2, 2024 PUBLIC COWETA COUNTY
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19 NOTARY PUBLIC
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