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

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,
Plaintiff,

vs. CASE NO.: 1:21-CV-05337-SCJ

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

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(Appearance via Vide Conference)

DEPOSITION OF: KATIE BAILEY GLENN
DATE: December 14, 2022
TIME: 1:00 p.m.
LOCATION: Home of Katie Bailey Glenn
140 Greenway Park Drive
McDonough, Georgia
tAKEN BY: Counsel for the Defendant
REPORTED BY: Mary K. Stepp, Court Reporter
(Appearance via Video Conference)

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KATIE BAILEY GLENN,
having been first duly sworn, testified as follows:
EXAMINATION
BY MR. TYSON:
Q. Well, good afternoon, Ms. Glenn. My name is Bryan Tyson, and we met a minute ago via Zoom. I represent the Secretary of State in the case that you're a plaintiff in.
And so our goal today is just to ask you a few questions about the case and about you and learn a little bit more about the claims that you're bringing.
Have you ever had your deposition taken before?
A. I have.
Q. Okay. So, that's good. So you're experienced on this already. I'll just give you a few kind of rules of road, just so we can be refreshed about what we need to do here today.
So my goal today is -- I'm going to ask questions for you to answer. My goal's not to confuse you or try to trip you up. Anybody who's been with me in a deposition before will tell you, I can ask a question that sometimes makes absolutely no sense. And if that happens just let me know that and

I'll rephrase it and we'll give it another shot. So please ask me to do that.

Since we're on Zoom, and for the court reporter's benefit, in normal conversation we can sometimes talk over each other because we anticipate what the person's going to say because we know where they're going with a question. It's best if I finish my question and then you begin your answer, and so we can do that.

It's also best, since we're doing a transcript of our conversation today, for you to say yes and no, instead of uh-huh or huh-uh. And nodding or shaking your head doesn't really work that well either, because we can't capture that on the transcript.

So will that work for you?

A. Yes.

Q. Perfect. That's exactly what we want to do. If we -- if you need a break at any point, just let us know. I don't think we're going to go too much beyond, but even if we do two hours, it'll probably be -- that's the most I think we would do.

But if you need a break, just let us know. The only request I have is that we don't take a break if I've asked a question before you answer it. So if

we have a question pending, we'll wait to do that.

MR. TYSON: And just to -- a couple of housekeeping things. Ms. Mitchell, are you okay with us reserving objections except as to form and responsiveness?

MS. MITCHELL: Yes.

MR. TYSON: Okay. And Ms. Glenn, I'm assuming, wants to read and sign?

MS. MITCHELL: Yes.

BY MR. TYSON:

Q. Okay. Great. All right. So, what we're going to do, Ms. Glenn, is just kind of do some questions about you and your background and kind of what you've been involved with over your life. So we'll do that first, get to know you a little bit, and then we'll talk some more about the case.

So, let me just ask first, you mentioned earlier that you've had your deposition taken before. Do you recall approximately how many times you've been deposed?

A. Yes, about three times.

Q. Okay. And do you remember what those cases were, the three times you've been deposed?

A. Personal items, personal things, something that pertained to me in reference to home, my home.

Q. Okay. Got it. And we don't need to get more detailed than that. My -- have you ever given a deposition in a case involving voting before?

A. No.

Q. Okay. And have you -- I know you're a plaintiff in the lawsuit here. Have you ever been a plaintiff in a lawsuit related to elections or voting before this one?

A. Yes.

Q. Okay. And what was that case?

A. Something... hmm. Uhm, minor, really it was. I assisted at -- one time of these. I assist with voting work, at that time.

MS. MITCHELL: Bryan, would you mind repeating the question? Sorry. Just to make sure that we understood what the question was.

MR. TYSON: Certainly, yes.

BY MR. TYSON:

Q. And, Ms. Glenn, my question just was have you ever brought a lawsuit before this case, basically sued somebody about the voting process or elections?

A. I did not bring it.

Q. Got it. And you mentioned that you had assisted with voting. Have you worked as a poll

worker before in an election?
A. I worked, yes.
Q. Great. Well, thank you. I know we always need poll workers, so I know everybody is grateful you were willing to do that. Thank you.
Let me ask you a couple other just kind of questions I have to ask everybody. Please don't be offended that I'm asking. Have you taken any medication or have any medical condition that would keep you from testifying fully and truthfully today?
A. No.
Q. And have you ever been arrested before?
A. No.
Q. I'm sorry, Ms. Glenn, I don't think I caught the answer -- have -- to that question.
MS. MITCHELL: Can you repeat your answer?
BY MR. TYSON:
Q. Could you repeat your answer?
A. No, I have not.
Q. All right. And so I'm assuming you've never been charged with a crime before, right?
A. I have not.
Q. So in getting ready for your deposition today, did you talk to anybody besides your lawyers about having your deposition taken?

A. No.
Q. All right. Do you recall whether you discussed this case with anybody who's not a lawyer for you in this case?
A. I have not.
Q. Okay. Did you look at any documents or other materials to help you get ready for your deposition today?
A. Yes, sir.
Q. Okay. And do you recall what those documents were that you looked at?
A. Something that I had written.
Q. And was what you wrote about the issues in this case or was it about something else?
A. About the issues in this case.
Q. Okay. And did that document help you remember some of the things you needed to talk about in the case today?
A. Yes.
Q. Okay. And had you submitted that document to anybody else before or was it just your personal notes?
A. My personal notes.
Q. And do you have those notes with you today? You don't have to -- you don't have to find

them. I'm just asking if they are in front of you or with you right now.

A. It's just statements, just sentences.

Q. Okay.

A. Right.

Q. And besides those notes, do you recall looking at anything else today to help you get ready for your deposition?

A. No.

Q. And have you provided Ms. Mitchell or your other lawyers with a copy of the notes that you wrote down about the case?

A. No.

Q. Okay. Do you mind providing us a copy of those notes or at least giving them to your lawyer, so that they can review them and give them to us?

A. Yes.

Q. Yes, you do mind or yes, you'd be willing to do that? I'm sorry, that was a terrible question on my part.

A. I would.

Q. Okay.

MR. TYSON: So, Cassandra, we can talk about that maybe after, would that be all right?

MS. MITCHELL: Sure. Of course.

MR. TYSON: Okay.
BY MR. TYSON:
Q. All right. Ms. Mitchell, so let me learn a little bit more about you. If you could give us your full -- I'm sorry, Ms. Glenn. If you could give us your full name and your current home address, please.
A. My name is Katie Glenn. My home address is [redacted] McDonough, Georgia 30253.
Q. Okay. And, Ms. Glenn, approximately how long have you lived at the [redacted] address?
A. I've lived here since 1968.
Q. And that address is in Henry County, right?
A. Yes.
Q. Okay. And have you always lived in Henry County or have you only lived there since 1968, which is definitely plenty of time but...
A. Yes. No. I lived elsewhere.
Q. Okay. Were those other places in Georgia or were they in other states?
A. They were in Georgia.
Q. Okay. I don't need a complete list, but do you have a quick rundown of where those other

places were in Georgia that you've lived?
A. Yes. Macon, Georgia; Eastman, Georgia; Dublin, Georgia; and Savannah, Georgia for a while.
Q. All right. All up and down I-16. So that's great. So, can you just tell me what moved you to Henry County in 1968?
A. My employment.
Q. And I'm assuming you're testifying from that [redacted] address today; is that right?
A. I am.
Q. Thanks. Great. And do you own the [redacted] address?
A. Yes.
Q. Do you have any other properties elsewhere in Georgia, besides that address?
A. I hesitate because I'm about to sell another property.
Q. Got it. Are you about to sell your [redacted] address or a different one?
A. A different one.
Q. Okay. Well, maybe I can make this easy -- an easier step here. Have you ever been registered to vote since 1968 at any address other than your [redacted] address?

A. Uhm, will you repeat that, please?
Q. Certainly. Yes. Let me do it this way. So, you're registered to vote with your residence at your address on [redacted] right now, right?
A. Yes.
Q. And since you moved there in 1968, have you been registered to vote at any other address in Georgia, besides [redacted]?
A. Yes.
Q. Okay. How -- where was that other address where you've been registered? Which county?
A. Laurens County.
Q. So, I'm sorry, Ms. Glenn. I may have gotten mixed up on my questions here. So, when you mentioned you had lived in Macon, Eastman, Dublin, and Savannah at different points, were those between 1968 and now or were those before 1968?
A. Those were before 1968.
Q. Okay. And so when you said you were registered to vote in Laurens County after 1968, approximately when was that?
A. Not Laurens County 1968.
Q. Okay. So then after 1968, you've only been registered in Henry County; is that right?
A. Oh, all right. Yes. Only in Henry, yes.

Q. And then for your registration -- well, you've not lived at any other address in Henry County except for your [redacted] address, right?

A. Right. No.

Q. Okay. And so you haven't been registered to vote in Henry County at any address other than your [redacted] address, right?

A. No.

Q. Okay. And just to clarify, since you said no, just to make sure the record -- I think we both know what you're saying, but there is no other address in Henry County where you've been registered, except for [redacted], is that a right statement?

A. That's a right statement.

Q. Okay. Great. Thank you. So, Ms. Glenn, can you tell me when and where you graduated from high school?

A. Graduated in 1945, Macon, Georgia, Ballinger High School.

Q. Okay. And did you go to college after you graduated from high school?

A. Yes.

Q. Okay. And where did you go to college?

A. I went to college, Savannah State College.

Q. Okay. And was that starting in 1945 or 1946?
A. 1945.
Q. Okay. And did you graduate from Savannah State?
A. Yes, I did.
Q. And what year did you graduate?
A. In 1950.
Q. Okay. And what was your degree?
A. My degree was English.
Q. English. Okay. And after graduating from Savannah State, did you -- have you had any other formal education after that point?
A. Yes.
Q. Okay. So what is the next kind of educational institution you attended?
A. I attended, uhm, other places.
Q. Okay.
A. One was Rutgers University in Piscataway, New Jersey. DeLand, Stetson University. Fort Valley State College, Georgia State University in Atlanta.
Q. All right. So, do you recall approximately when you attended Rutgers University?
A. I was employed, at the time. About -- let's see. Had to be in the '60s. 1975.

Q. Okay. And did you graduate or get any degrees from Rutgers?
A. I did not graduate, but I received a degree.
Q. I'm sorry, I lost the last part of that. You didn't graduate, but you received which piece? The Zoom cut out.
A. I did not graduate. It was a -- it was during the summer, summer school.
Q. Oh, got it. And was it a certificate?
A. And --
Q. I'm sorry.
A. I took French classes there. It was during the summer.
Q. Okay.
A. And worked. Worked some, too.
Q. Okay. Got it. And then you mentioned Glenn Stetson University (sic), do I have that right?
A. Stetson.
Q. Stetson. Uh-huh. And do you recall approximately when you attended Stetson?
A. I was in Florida, at the time. It was '70- -- '78.
Q. Okay. And did you take classes there or was it like your time at Rutgers, where it was a

summer program?
A. I took classes there.
Q. And did you receive a degree from Stetson University?
A. I did not.
Q. So you mentioned Fort Valley State as well. Do you recall approximately when you attended Fort Valley State?
A. It was also in the '70s.
Q. Okay. And did you get any degree from Fort Valley State, when you were there?
A. I did not.
Q. Okay. And then you mentioned Georgia State as well. Do you recall when you attended Georgia State?
A. It was in the '70s. 1970- -- no. It was later than that. Had to have been. That had to be in the '80s, yes.
Q. Okay. And did you receive any degree from Georgia State University?
A. No.
Q. Okay. So, besides your English degree from Savannah State, is it correct that you don't have any other graduate degrees or postgraduate degrees?

(Off-record discussion due to technical difficulties.)

MS. MITCHELL: We lost you for a second there, Bryan, but I think we're back.

MR. TYSON: We lost you, too. Glad you're back. All of a sudden you were frozen.

BY MR. TYSON:

Q. Just to reset, let me just ask, Ms. Glenn, besides your English degree from Savannah State, do you have any other graduate degrees or college degrees?

A. Yes.

Q. Okay. And what are those?

A. Master's in English Education, Georgia State University.

Q. Okay. And did you receive your Master's in English education from Georgia State based on your time in the -- when you attended there in the 1980s that you recall?

A. Yes.

Q. Do you have any other degrees besides that master's from Georgia State?

A. No.

Q. Okay. And do you have any professional licenses of any kind?

A. Yes.
Q. Okay. What are those?
A. Also worked with young ladies who were -- who did not graduate from high school, but took special classes that prepared them for jobs and for their education, if they chose to go.
Q. Okay. And did you have to have a special license to teach those kinds of classes?
A. Not a special license, just... classes.
Q. So -- uh-huh. Got it.
A. Uh-huh.
Q. So, do you have like a teaching certificate or a real estate license or anything like that related to a profession?
A. I have a teaching certificate.
Q. Okay. And do you recall when you first got that teaching certificate?
A. It was so long ago.
Q. If you can't remember, that's fine. You've had it for a while, at least?
A. Yes.
Q. Okay. And besides your teaching certificate, do you have any other certificates or licenses like that?
A. Only working with the group that I

mentioned --
Q. Yeah.
A. -- where we -- they attended classes.
Q. Uh-huh.
A. They received -- that's a certificate, whereby they could further their education --
Q. Uh-huh.
A. -- or work.
Q. Great. Thank you so much. So, let me talk a little bit about kind of the jobs that you've had. So, could we start with your most recent employment? What was that?
A. Most recent?
Q. Yes, ma'am.
A. That was working with the group girls.
Q. Okay.
A. Or the persons who really wanted to go on to college or another job.
Q. And was that with a particular organization or was it just something you were doing with others?
A. It was work to them. They attended classes --
Q. Uh-huh.
A. -- at a special place. But it was work.

Work. I taught them and then they observed, prior to that.

Q. Uh-huh.

A. And they were tested. And then they were ready to go on to college and to work.

Q. Okay. So, then do you recall approximately when you were helping teach those classes?

A. After I retired.

Q. And what year did you retire?

A. 1977.

Q. All right. So, between 1977 and now, besides teaching the classes you referenced, did you have any other paying jobs?

A. I did not.

Q. Okay. And when you retired in 1977, who were you employed by right before you retired?

A. By the Henry County Board of Education.

Q. Okay. And what was your role in Henry County Board of Education?

A. I was in education, high school -- taught high school English and French.

Q. Got it. And how long did you teach high school English and French in Henry County?

A. 20 years.

Q. That's wonderful. Thank you for your service on that. That's an amazing thing to get to teach all those students. That's great.

A. I enjoyed it.

Q. And was there a particular high school that you taught at or was there -- or was there even more than one high school in Henry County, at that point?

A. I taught at Henry County Senior High School.

Q. Okay. And before you started teaching at Henry County Senior High School, did you have any other teaching positions prior to that?

A. Yes.

Q. And you don't have to tell me the details, but just where were those schools located?

A. The first one was Peabody High School in Eastman, Georgia. And the second one was Oconee High School, Dublin, Georgia.

Q. And then did you go from Oconee High School in Dublin to Henry County Senior High School?

A. From Dublin.

Q. Okay. Great. So you really did kind of work your way up I-16 to get back to Henry County.

A. Yes.

Q. That's great. Well, thank you. Since you retired in 1977, have you been involved in any social organizations?

A. Hmm. No. Just for enjoyment. No.

Q. Got it. Have you been involved in any political organizations since 1977?

A. No. No.

MS. MITCHELL: If you have anything to add, you can add it.

THE WITNESS: No.

MS. MITCHELL: Okay.

BY MR. TYSON:

Q. Okay. Have you been involved in any organizations since 1977 that were lobbying or trying to implement a particular policy somewhere?

A. No.

Q. Well, let's move from kind of background into voter registration, if we can, and talk a little bit about that.

I know you said you're currently registered to vote in Georgia, but do you remember when you first registered to vote in Georgia?

A. 1965.

Q. 1965? And do you recall --

A. Uhm --

Q. Oh, I'm sorry. I didn't mean to cut you off.
A. I'm not quite sure about that.
Q. Got it.
A. I think that's it.
Q. Okay. And do you remember, was -- when you got registered to vote, we'll just say somewhere in the 1960s, do you recall if it was in Henry County or a different county in Georgia?
A. A different county in Georgia.
Q. And would that have been in Laurens County?
A. Yes.
Q. And just for my own curiosity, did you have to -- do you remember -- did you have to go in person? Did you fill out a form? Do you remember how -- how you registered, at that point, in Laurens County?
A. I just -- I'm not quite sure of the time. I'm sure that I must have filled out forms --
Q. Uh-huh.
A. -- for that purpose, yes.
Q. Okay. And how -- well, I'm assuming you've pretty consistently voted in Georgia elections since you were registered?

A. Yes.
Q. Okay. And are you -- we call it sometimes people super voters, who vote in every election. If it's the primary, the general, all that kind of thing. Would you fall into that kind of that super voter category?
A. Yes, definitely. Yes.
Q. And do you remember how you voted in the most -- well, I guess the November 2022 election? Did you go in person or did you vote by absentee ballot?
A. Mostly in person.
Q. Okay. Do you like to vote on election day or do you go early voting?
A. Early voting.
Q. Okay. And do you remember where you went to early vote in November of 2022? Was it the main office in Henry County?
A. I'm trying to -- it was absentee.
Q. Uh-huh. Okay. And is it right that you haven't voted in any other state before?
A. No.
Q. So, Ms. Glenn, when you vote in primary elections, do you tend to vote in one party's primary versus another's?

A. Well --
MS. MITCHELL: Do you mind rephrasing the question, Bryan?
BY MR. TYSON:
Q. Certainly. But let me ask it this way, Ms. Glenn. I'm sorry. When you vote in a primary election, do you vote in the Democratic primary or the Republican primary?
MS. MITCHELL: Answer.
THE WITNESS: Democratic.
BY MR. TYSON:
Q. Okay. Do you consider yourself to be a member of the Democratic party in Georgia?
A. Yes.
Q. Have you ever been involved in the Henry County Democratic party in any way, officially, volunteering or in a position?
A. Yes.
Q. Okay. And what were your roles in the Henry County Democratic Party?
A. Simply to observe voting.
Q. So you served as a poll watcher before in Henry County?
A. Yes.
Q. Okay. Have you ever held a leadership

position in the Henry County Democratic party, like president or chairman or treasurer or something like that?

A. Of any organization?

Q. No, ma'am. Just -- I'm sorry. Just at the Henry County Democratic party. Have you served as an officer of that organization? Just that one.

A. No.

Q. Okay. Have you ever served in a position with the Democratic party of Georgia, as opposed to the county party?

A. Yes.

Q. Okay. And what positions were those with the Democratic party of Georgia?

A. It's been a long time, really. Poll watchers for them.

Q. So you served as a poll watcher for the Georgia Democratic party. Have you ever served as an officer of the Georgia Democratic party?

A. No.

Q. Have you participated in any activities from the Democratic party of Georgia?

A. No.

Q. Have you ever worked on a political campaign of any candidate?

A. No.
Q. Okay. Have you ever considered yourself to be a member of the Republican party or have you always considered yourself to be a member of the Democratic party?
A. No.
MS. MITCHELL: Bryan, do you mind restating that?
MR. TYSON: Yeah.
BY MR. TYSON:
Q. So, Ms. Glenn, have you ever considered yourself a member of the Republican party?
A. No.
Q. Have you ever helped or volunteered on a campaign for any politician who was running for office?
A. Can you repeat that, please?
Q. Certainly. Yes, ma'am. Have you ever been a volunteer on a political campaign?
A. No. Almost.
Q. What was the last part, Ms. Glenn? I'm sorry. I didn't hear that.
A. I said almost. It was not volunteering, but helping, in other words.
Q. So you've helped on a campaign before, but

not served as a volunteer?
A. Yes.
Q. Okay. And which campaign did you help out with?
A. Democratic.
Q. Okay. Was there a particular democratic candidate or was it just helping out with democratic campaigns as a group?
A. As a group.
Q. Okay. And was that in Henry County or was that for the Georgia Democratic party?
A. Henry County.
Q. Have you ever -- or do you ever recall voting for a republican candidate for office?
A. No.
Q. Ms. Glenn, if you're still doing okay, I'd like to start talking about this particular lawsuit. If you're going well. Or we can take a break, if you'd like to. It's up to you.
MS. MITCHELL: Do you want to take a break? Are you still doing okay? Let's take a break. Take a quick break, if that's all right.
MR. TYSON: Okay. We'll do five minutes.
(Recess was taken from 1:46 p.m. to 1:52 p.m.)

BY MR. TYSON:
Q. Ms. Glenn, I did want to ask you one other question before we get back into the lawsuit. Is there anybody else in the room with you besides Ms. Mitchell and you or is it just the two of y'all?
MS. MITCHELL: Ms. Williams is also in the room. She's around the side. Yeah.
BY MR. TYSON:
Q. Got it. Thank you. All right. So, Ms. Glenn, I have some questions for you about this case that you're involved in as a plaintiff. So, when did you first learn about the Alpha Phi Alpha case that you're a plaintiff in?
A. Hmm. With reference to time, I guess about -- months ago.
Q. Months ago. Okay. Do you remember, was it at the end of 2021 or was it before that? Do you recall approximately when?
A. It was the end -- end of 2021.
Q. End of 2021. Okay. So, like Christmas, December 2021, approximately?
A. I don't know. It wasn't that long that I looked at it.
Q. So, I'm sorry, Ms. Glenn. I didn't quite catch that. So you learned about -- you first

learned about the case in December of 2021?
MS. MITCHELL: Sorry, Bryan. You're breaking up there a little bit.
THE WITNESS: Yes.
MR. TYSON: Oh, got it.
MS. MITCHELL: I didn't -- if you can just repeat the question.
MR. TYSON: Certainly. Yes.
BY MR. TYSON:
Q. Sorry, Ms. Glenn. So I just wanted to make sure I heard correctly. Did you first learn about this case in December of 2021?
A. I think so. May I come back to that because I have to decipher some things.
Q. Oh, certainly. That's fine. We can come back to that.
A. Yes.
Q. Well, and we may need to come back on some other things. My next question was going to be, who -- did somebody contact you about the case or did you reach out to somebody about being part of a case?
A. Somebody contacted me about the case.
Q. Okay. And do you remember who it was that contacted you?
A. Yes.

Q. And who was it?
A. My son mentioned it.
Q. And what is your son's name?
A. Kenneth Glenn.
Q. And does Kenneth have a role with any political party in Georgia?
A. No.
Q. What does -- what does he -- what does Kenneth do for his job?
A. He's an attorney.
Q. An attorney. Okay. And is he an attorney in Georgia?
A. Yes.
Q. Okay. Do you know what kind of law he deals with mostly in his role?
A. Family practice.
Q. Okay. And do you recall where -- did he mention, I guess -- well, let me ask this. So, Kenneth mentioned the case to you. Do you recall -- did someone else contact you next or what was your next conversation about the case?
A. I don't recall.
MS. MITCHELL: Can you say that a little louder? Or did you hear, Bryan?
MR. TYSON: Oh, I'm sorry. I didn't hear

a response. I'm sorry.

THE WITNESS: I said, I don't recall.

MR. TYSON: And, I'm sorry, you got a call from somebody else about the case? It's breaking up a little bit. But I'm not hearing the answer.

MS. MITCHELL: All right. She said, I don't recall.

MR. TYSON: Don't recall. Got it. And that's fine. It's totally fine. It's not a memory test. So you're great. Sorry about that.

BY MR. TYSON:

Q. Do you remember, Ms. Glenn, if you signed anything with any lawyers about being part of this case?

A. No.

Q. Okay. So, can you tell me a little bit about what led you to decide to file this lawsuit about Georgia's redistricting maps?

A. Yes. After talking with my son -- not talking with him, just he mentioned it, you know. I asked him about how do I know about it, so -- and expressed my feelings. And then I consented, said yes, I would assist, what I'm doing now, that I would consent to participate in this interview.

Q. And I know you're not a lawyer --

A. No.
Q. -- so I'm asking you for -- oh, I'm sorry.
A. May I --
MS. MITCHELL: Can you say that again? Sorry. What did you say, Ms. Glenn?
THE WITNESS: I did sign something that I would consent to do this.
BY MR. TYSON:
Q. Got it. Understood. Thank you. So, Ms. Glenn, I know you're not a lawyer and I'm not asking you for, you know, what the legal, technical language is, but just in your own words, what do you hope that this case --
MS. MITCHELL: Bryan, you cut out again.
MR. TYSON: Oh, did you lose me?
MS. MITCHELL: Sorry, Bryan. We lost you.
MR. TYSON: Okay.
MS. MITCHELL: You cut out again. Do you mind just restarting that again?
MR. TYSON: Yeah.
BY MR. TYSON:
Q. So, Ms. Glenn, I'm just asking for your own words, not the legal technicalities. But in your own words, what do you hope to accomplish with this lawsuit?

And I think y'all are frozen again for me.
A. Consideration and change.
Q. So, I'm sorry, Ms. Glenn, that broke up some. Did you say your answer, what you wanted to accomplish was consideration and change?
A. Yes. Recognition.
Q. Uh-huh. And recognition of what, in particular?
A. That change needs to be made.
Q. Okay. And is the change that you're seeking to make, again, in your own words, that more Democratic members can be elected to the legislature?
A. Yes.
Q. So, Ms. Glenn, do you recall when you first talked with your lawyers in this case? Was that also December of 2021?
A. Yes.
Q. Were there any meetings that were held -- I know you had the discussion with your son. But besides that conversation, did you talk to anybody else before you hired a lawyer for this case?
A. Yes. No. No.
Q. Okay. So you -- okay. No, okay. Got it. And another question I have to ask, please don't be offended, just have to ask everybody. But have you

been paid at all or received anything of value for your role as a plaintiff in this case?

A. No.

Q. Ms. Glenn, do you recall ever seeing a document that was called a complaint about this lawsuit? And if not, that's okay. I just didn't know if you remembered seeing it or not.

A. I don't recall right now.

Q. Okay. Ms. Glenn, do you know if you live in State Senate District No. 17?

A. 17? No.

Q. Do you know if you live in House of Representatives District No. 117?

A. No.

Q. Do you recall in the Senate District 17 election in November 2022 if you voted for Brian Strickland or for Kacy Morgan?

A. No.

Q. Okay. And do you recall in the House District 117 election in November of 2022, if you voted for Lauren Daniel or Demetrius Rucker?

A. No.

Q. Do you know if your preferred candidate was successful in the State Senate District 17 election in the November 2022 election?

A. No.
Q. Do you know if your preferred candidate was successful in the House District 117 November 2022 election?
A. No.
MS. MITCHELL: I'm sorry, Bryan. Could you reframe the question? Was the question, does she know or was the question was her candidate --
MR. TYSON: The question was, does she know if her candidate was successful. So, do you want me to ask those again?
MS. MITCHELL: If you don't mind.
MR. TYSON: Okay. Sure.
BY MR. TYSON:
Q. So, Ms. Glenn, let me -- just so we're clear, I'm asking if you know if your -- the candidate you wanted to win won the Senate District 17 election in November 2022?
A. Uhm --
Q. Ms. Glenn froze on me again.
(Brief pause for technical difficulties.)
(Kelsey Miller just entered the video conference.)
(Recess was taken from 2:10 p.m. to 2:14 p.m.)

BY MR. TYSON:
Q. All right. Ms. Glenn, so I wanted to ask you specifically about Senate District 17. And my question is, do you know if the candidate you wanted to win the Senate District 17 election won that election in November of 2022?
A. Yes.
Q. Okay. And so did the candidate you wanted to win the Senate District 17 election win that election in November of 2022?
A. Yes.
Q. Okay. Did the candidate that you wanted to win the House District 117 election in November 2022 win that election?
A. Yes.
Q. Okay.
A. Uhm, I don't -- yes, the candidate won.
Q. The candidate --
A. If my memory is right, yes.
Q. Got it. Okay. So the candidate you wanted to win won the House District 117 election?
A. Yes.
Q. So thinking back --
MS. MITCHELL: Wait.
MR. TYSON: Sorry.

MS. MITCHELL: She said something else. What did you say, Ms. Glenn?

THE WITNESS: I'm just thinking about it, the nomination. Yes. My candidate won.

BY MR. TYSON:

Q. Okay. So thinking back to 2021, do you remember that the legislature had a special session to draw new redistricting maps?

A. No.

Q. Have you ever sent anything to a Georgia legislator about how they should draw district maps in 2020 or 2021?

A. No.

Q. Have you ever testified to the Georgia General Assembly about redistricting in 2020 or 2021?

A. No.

Q. Did you attend any of the hearings the Georgia legislature held related to redistricting?

A. No.

Q. Do you recall attending any meetings about redistricting that weren't about this case?

A. No.

Q. So, Ms. Glenn, if someone was not from Georgia and asked you where you were from, how would you describe to them where you're from?

A. I would say I live in Georgia.
Q. And would you say you were from Henry County, Georgia? Would you say that you were from McDonough, Georgia? Would you have a way of describing that to them?
A. I would say I'm from Henry County, Georgia.
Q. And if you were describing kind of the community where you live, would you describe Henry County to somebody?
A. Yes.
Q. Have you ever heard the term "community of interest" before?
A. Repeat the word, please.
Q. Yes, ma'am. Have you ever heard the term "community of interest" before?
A. Not in those words.
Q. Okay. Are you a member of any church or faith-based organization?
A. Yes.
Q. And what is your church?
A. Denomination, United Methodist. Wesley Chapel United Methodist Church.
Q. Okay. Wesley Chapel United Methodist Church?

A. Right.
Q. And that's -- is that located in Henry County?
A. Yes.
Q. Besides Wesley Chapel United Methodist Church, are you involved in any other civic organizations in Henry County?
A. Yes.
Q. And what are those?
A. The retirement teachers organization.
Q. Okay. And is the retired teachers administration for Henry County specifically or is it for Georgia or is it for some other geographical area?
A. It's for -- it's for Henry County.
Q. And can any teacher who retires from Henry County be part of the retired teachers administration?
A. Yes.
Q. Are there any other civic organizations you're involved in?
A. Sorority, but that wouldn't be civic. But yes.
Q. And what is the name of your sorority?
A. Alpha Phi Alpha -- Alpha Kappa Alpha.

Q. Alpha Kappa Alpha. Okay.
A. Yes.
Q. Any other civic organizations besides Wesley Chapel, the retired teachers administration, and Alpha Kappa Alpha?
A. Not now. Has been. Church-wise. There are organizations in the church.
Q. All right.
A. With the various committees at church.
Q. Yes, ma'am.
A. The historical society, I worked for that.
Q. Okay. And is that the Henry County -- I'm sorry, Ms. Glenn.
A. Heard what I said? Worked with history at the church. History and that committee.
Q. Okay. So --
A. Retired teachers. Did I tell you -- I said retired teachers?
Q. Yes, ma'am.
A. Okay. I worked with so many groups at church, you know, from time to time through the years, that's why I hesitate with that.
Q. Yes, ma'am. So, just so I'm clear, is the historical society the same as the history work at the church that you referenced or are those two

different things?
A. History of the church.
Q. Okay. Got it. Thank you.
A. And --
Q. And you mentioned --
A. And, well, okay. My family. I work with the family reunion and the history of the family. I've written some books, you know, about the history of the family.
Q. That's wonderful. Is your -- is the family primarily based in Georgia, where you've been writing the histories about them?
A. Yes.
Q. Okay. And you mentioned the music efforts at your church. Do you play any instruments there or did you?
A. No.
Q. Okay. So, Ms. Glenn, if I was to ask you to describe what you think of when you think of your community, what would you describe?
A. A very active community. Very close-knit community. Interest in the community in many ways. We meet, we talk. We used to exercise together. Very close. Concerned about the welfare of the kids and children in it and the adults.

Q. Uh-huh.
A. And the progress of whatever's going on in the community.
Q. Yes, ma'am. And is that community that you're talking about centered on your church or is it about Henry County more generally?
A. Now it's the church. But it's also been about Henry County more generally. Because kids have grown up and some -- many of them have gone away to school and other places. So, a lot of them are retirees in close proximity. But it's the Henry County in general that we're concerned about.
Q. Okay. Thank you. That's helpful. So what I want to do next is just ask some questions about voting and things that have happened in voting over time.
So, my first question is, have you ever personally been prohibited from registering to vote because of your race?
A. No.
Q. Okay.
A. Well, just a minute. Yes.
Q. Okay.
A. Yes.
Q. And do you recall when you were not able

to register to vote because of your race, was that while you were in Savannah or in Eastman? Do you remember where that was? Where you were living, when that was the case?

A. Here.

Q. In Henry County?

A. Henry County.

Q. Okay. And did you attempt to register to vote in Henry County and were denied the right to vote and register, I mean, to register in Henry County?

A. Uhm, you said registered to vote and vote. Isn't it -- that's a difference.

Q. Yes, ma'am. Let me ask my question again, because that was a terrible question. Let me do that again.

Do -- what were the circumstances around when you were prevented from registering to vote, based on your race in Henry County?

A. Okay. So, of course, prevented from voting by making it difficult for me to get there and more or less a change in the place of voting without notifying or informing the public that that's about to happen.

Q. Do you remember which election that was

where your voting place was changed and people weren't informed?

A. With reference to the year, is that what you're asking?

Q. Yes, ma'am. Which election or who the candidates were, what the year was, anything you can remember about when the election was where that happened.

A. I remember it -- not the year. I don't remember the year, the precise year. But I do remember what happened, at that time. So I went to vote and registered, of course. And we could not find a place. The voting place was changed. And we were not notified.

Q. And do you remember was that a long time ago? Was it more recently?

A. I'd say it's been about -- not -- not -- about three years or so.

Q. Okay.

A. Within that time, I'd say.

Q. And then what led you to conclude that moving your precinct was keeping you from voting on account of your race?

A. At that time, we had individual race -- okay. Because we normally voted in one

place, in the high school. We went to vote because I voted every year. And when I went to the school, they had changed it and moved it to another place, to the gymnasium, which was not -- one had to go about a block or two and go another route to get to where the voting had been changed. And we didn't know it. And it was difficult getting there, that's why.

Q. Okay. And though -- besides that time when your polling place moved, has there been any other time in Henry County where you were prevented from voting, based on your race?

A. No.

Q. Besides the time we just talked about with the polling place, have you ever been prohibited from participating in the political processes in Henry County because of your race?

A. No.

Q. And besides the polling place issue we talked about, have you ever been prevented from registering to vote in Henry County, based on your race?

A. No. Prevented. You said prevented, did you not?

Q. Right. When you were unable to register to vote in Henry County because of your race.

A. No.
Q. Ms. Glenn, do you know if the government of Georgia -- I'm sorry.
MS. MITCHELL: Just one second.
THE WITNESS: I need to make a correction.
MR. TYSON: Yes, ma'am. You want me to repeat the question?
(Brief pause for technical difficulties.)
BY MR. TYSON:
Q. So, Ms. Glenn, do you want me to repeat the question one more time? Would that help?
A. Yes.
Q. Okay.
MS. MITCHELL: Sure. You can hear the question again.
BY MR. TYSON:
Q. Yeah. Let me just ask one more time, so we're clear.
A. All right.
Q. Have you ever been prevented from registering to vote in Henry County based on your race?
A. No.
Q. Okay. Ms. Glenn, do you know of any discrimination by the government of Georgia against

black voters related to their participation in the political process?

A. Georgia. Yes.

Q. Okay. And what would that be?

A. Probably prevented.

Q. And my question was just discrimination, not so much being totally prevented.

MS. MITCHELL: Repeat the question, Bryan.

BY MR. TYSON:

Q. Yes. Ms. Glenn, do you know of any discrimination by the government of Georgia against black voters related to their ability to participate in the political process in Georgia?

A. Yes.

Q. Okay. And what is that discrimination that you know of?

A. Uhm... uhm, difficulty in voting. Kind of scheduling voting. That type thing.

Q. Okay.

A. Long lines. Difficulty -- not as easy. Having to wait a long time in order to vote, as compared to other places. For example, there have been times when we had to stand in long lines, wait a long time. And one could go to another voting precinct in another community, and walk right in and

vote.
Q. And --
A. They did.
Q. Have you personally had to stand in a long line to vote in Henry County?
A. Two times. And after that I was able to vote by absentee, by absentee vote.
Q. Uh-huh.
A. And I would vote instead of mailing it. I would take it to the vote.
Q. And you referenced a situation where people in one precinct were standing in a long line and people at another precinct were able to walk right in. Is that something you personally saw or just something that you heard about?
A. I heard about it and I saw it. Both.
Q. Okay. And do you remember which precincts it was, when you saw it?
A. Let's see. Hmm. One or two or maybe three. A lot of them.
Q. Were all those precincts in Henry County?
A. Yes.
Q. And was that at a recent election or was it an election a long time ago?
A. Within two years.

Q. Within two years?
A. Yes.
Q. Do you remember -- I'm sorry. I didn't mean to interrupt you.
A. I said yes.
Q. Okay. And do you remember, were those long lines at the primary election in 2020 during COVID?
A. Before COVID?
Q. Before COVID. Do you recall personally seeing any lines in the 2022 elections that were in Georgia? Oh, I think we froze again.
(Brief pause for technical difficulties.)
MR. TYSON: There we go.
MS. MITCHELL: All right.
MR. TYSON: I think you're back now. Yeah. Or not. Y'all are still frozen, if you can hear us.
MS. MITCHELL: All right. Now, can --
MR. TYSON: Okay. There you go, I can see now. Or no. Back to being frozen, Cassandra. Sorry.
(Off-record discussion during technical difficulties.)
BY MR. TYSON:

Q. So, Ms. Glenn, my question was, do you recall seeing any lines to vote in the 2022 elections in Henry County?

A. No, I was not in... let me think. No. You're not speaking about long -- long lines?

Q. Yes, ma'am. My question was, did you see long lines in the 2022 elections in Henry County?

A. Oh, yes.

Q. Okay. And was that for the primary or for the general election?

A. The general.

Q. General. Okay. And do you remember where those lines were occurring in the general election?

A. At the regular voting place in McDonough. It was the regular voting place downtown.

Q. Was that during early voting that you saw those lines or on election day?

A. Election day.

Q. Okay. Ms. Glenn, in your personal opinion do black voters in Georgia generally vote for democratic candidates?

A. Yes.

Q. And you're aware that Georgia uses a majority vote requirement, so a candidate has to get over 50 percent to win the election or else there's a

1 runoff, right?
2 A. Yes.
3 Q. And the runoff elections in 2021 led to
4 the election of Senator Warnock and Senator Ossoff.
5 Do you remember that?
6 A. Yes.
7 Q. Okay. And did you personally support
8 Senator Warnock and Senator Ossoff's election?
9 A. Yes.
10 Q. Ms. Glenn, has a lack of access to
11 education ever kept you from participating in the
12 political process in Georgia?
13 A. No.
14 Q. Has a lack of employment opportunities
15 ever kept you from participating in the political
16 process in Georgia?
17 A. No.
18 Q. Has a lack of access to health services
19 ever kept you from participating in the political
20 process in Georgia?
21 A. No.
22 Q. Have you ever heard the term "a racial
23 appeal," when it's made in the context of an
24 election?
25 A. A racial app- --

Q. Appeal.
A. Not decided the answer. Just a minute. No, I guess.
Q. Have you seen political campaigns in Georgia in the past that try to portray a black candidate in a negative light?
A. Yes.
Q. And have you seen that done for both black Republicans and black Democrats?
(Brief pause for technical difficulties.)
BY MR. TYSON:
Q. There we go. So, Ms. Glenn, I was just asking, have you seen ads that portrayed black candidates in negative light that were referring to both black Democrats and black Republicans?
A. Yes.
Q. I know you're aware of this, but you're aware that Senator Raphael Warnock was just reelected as the U.S. Senator from Georgia and is a black man, right?
A. Yes.
Q. And you're aware that Georgia has elected several individuals who are black to statewide office over time, right?
A. Yes.

MR. TYSON: Ms. Glenn, if you can give me just maybe five minutes here to check my notes, I think I might be finished with my questions. If we can just take a short break.

THE WITNESS: Uh-huh.

MR. TYSON: Okay. Thank you.

(Recess was taken from 2:52 p.m. to 3:01 p.m.)

MR. TYSON: All right. So, Ms. Glenn, thank you so much for your time today. I don't have any other questions for you. Your lawyers might. But I really appreciate you taking the time to talk with me this afternoon and working through the technical problems with us. Thank you very much.

MS. MITCHELL: Thank you.

THE WITNESS: No problem.

MS. MITCHELL: Bryan, we just had a couple questions, if that's okay.

MR. TYSON: Sure.

EXAMINATION

BY MS. MITCHELL:

Q. This past election, the 2022 election --

A. Yes.

Q. -- do you recall this election?

A. Yes.

Q. Do you recall voting for state senate -- recall a candidate for state senate?
A. Yes.
Q. So --
A. State senate?
Q. Yes. Do you recall if you voted for a candidate for state senate?
A. Yes.
Q. Do you recall if you voted for a democratic or republican candidate for state senate?
A. Yes, voted for democrat.
Q. You voted for a democratic candidate for state senate; is that right?
A. Yes.
Q. Okay. And what about for state house, do you recall if you voted for democratic or republican candidate for state house?
A. Democratic.
MS. MITCHELL: Great. Thank you. That was the only questions I had.
MR. TYSON: Okay. I don't have any further questions. So thank you so much, Ms. Glenn.
(The witness, after having been advised of her right to read and sign the transcript, does not waive that right.)

(Deposition was concluded at 3:03 p.m.)

CERTIFICATE OF REPORTER

I, MARY K. STEPP, Notary Public for the State of South Carolina at Large, do hereby certify that the foregoing transcript is a true, accurate, and complete record.

I further certify that I am neither related to nor counsel for any party to the cause pending or interested in the events thereof.

Witness my hand, I have hereunto affixed my official seal this 2nd day of January, 2023, at Campobello, Spartanburg County, South Carolina.

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Mary K. Stepp, Notary Public
My Commission Expires:
March 1, 2028

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REQUESTED INFORMATION

(No information requested.)

NO EXHIBITS

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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

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