EXHIBIT M

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

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.