EXHIBIT J

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

ANNIE LOIS GRANT, et al, Plaintiffs	Civil Action File No.
vs.	1:22-CV-00122-SCJ
BRAD RAFFENSPERGER, in his Official capacity as the Georgia Secretary of State, et al., Defendants.	
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COAKLEY PENDERGRASS, et al., Plaintiffs,	Civil Action File No.
Vs.	1:21-CV-05339-SCJ
BRAD RAFFENSPERGER, et al., Defendants.	

Virtual Videotape Deposition of
Derrick Jackson
Monday, February 20, 2023
At 2:30 p.m.

Reported by LeShaunda Cass-Byrd, CSR, RPR

Q. And those different social ties or social connections you were talking about, they -- they fit kind of within the boundaries of District 64 as it was on the prior plan.

Is that fair to say?

A. Absolutely.

Q. Okay. Well, let me move next to the special session.

So in the summer before the special session, did you receive a communication from Representative Rich asking to meet with you about your district?

A. Yes.

Q. And did you meet with her to talk about your district before the special session?

A. No. I did not.

Q. Is there -- is there a particular -- oh.

Did you meet with her at all during the special session to talk about your district?

A. No.

Q. Is there a particular reason why you chose not to meet with Representative Rich?

A. It was my understanding that there was no appetite for the majority party to even consider the maps of the minority party, and so I did not want to

1 waste Chairman Rich time or my time on an issue that
2 was futile. And so in -- in having conversations with
3 our minority leader, Leader Beverly, it was very clear
4 that the majority party was not willing to entertain
5 any inputs from the minority party.
6 Q. And so is the basis for that understanding
7 your conversations with Leader Beverly, or were there
8 other pieces that formed your understanding about the
9 relative desire to get input?
10 A. No. My -- it was solely on my conversation
11 with Leader Beverly, and with the general sense of the
12 majority party's position as it relates to drawing
13 congressional House and state senate district maps.
14 Q. Do you know if any democratic members of
15 the House met with Representative Rich to talk about
16 their districts?
17 A. I don't know.
18 Q. So is it fair to say that, if that was your
19 belief, you never made any requests for any changes on
20 your district when the first draft map was released
21 from the majority party?
22 A. I did not make any requests to Chairman
23 Rich, no.
24 Q. Did you make any requests for changes to
25 anyone else besides Representative Rich?

A. I only made my suggestion known to Leader Beverly.

Q. So it's fair to say then that you, kind of -- I guess for lack of a better term, kind of deputized Leader Beverly to handle any interaction with the majority party about your district; is that right?

A. That was a process and a protocol that was established, yes.

Q. And that was a process and protocol established in House democratic caucus?

A. Correct.

Q. As you -- during the summer, did you attend any of the public hearings about redistricting that were held around the state in 2021?

A. So, yes. But those were forms that we, the Georgia Legislative Black Caucus, commissioned. Not Chairman Rich.

Q. So there was Chairman Rich and Chairman Kennedy's public hearings that were being held, and you didn't attend those but you did attend some separate public hearings held by the Legislative Black Caucus?

A. That is correct.

Q. Do you recall if the Legislative Black

Democratic nominee in the general election?
A. No.
Q. Did you support Stacey Abrams for governor in the 2022 election?
A. Yes.
Q. And did you support Senator Warnock, I'm assuming over Herschel Walker in 2022?
A. I supported Senator Warnock.
Q. Have you heard the term "racial appeal" in the context of a campaign before?
A. No.
Q. Okay. And during the time you were in the state House, did you become aware of any needs that the black community had in Georgia that were different from those of white residents in Georgia?
A. Yes.
Q. And what were some of those needs?
A. Healthcare. The numbers prove what they are. A significant number of black citizens in the state of Georgia have little to no healthcare, versus someone that is white and non-Hispanic. If you want to talk about economics, a significant number of African Americans, their wages were far less than their White, non-Hispanic counterparts that could have the same degree, working at the same corporation.

And so there was a lack of equity and fairness around wages, healthcare, when you think about housing and affordability. And so we had to deal with a host of issues that African Americans would like to have the same as any other citizen in Georgia, or from a large part in the United States.

Q. Did you find your colleagues in the state House to be receptive to your explanation of those types of issues that were unique to African American citizens in Georgia?

MS. RUTAHINDURWA: Object to form. Vague.

BY MR. TYSON:

Q. And you can answer, if you can.

A. Repeat that question.

Q. Yes.

So when you were in the legislature, did you talk about these issues of healthcare and wages and housing and affordability, those types of issues that you just outlined, with your colleagues?

A. Yes.

Q. And did you find your colleagues receptive to what you had to say about what African Americans in Georgia needed on those issues?

MS. RUTAHINDURWA: Same objection.

1 THE WITNESS: They were only
2 receptive through lip service. And you can
3 tell by way of their votes. When it was
4 time to vote, they went along party line.
5 Let's take women's healthcare, for example.
6 We strongly opposed the need to talk about
7 or justify or controlling a woman's body,
8 and they went along with passing House Bill
9 41 against strong objection. We -- we
10 urged Republicans to talk about maternal
11 and infant mortality. We've got a huge
12 problem here in Georgia still. You can see
13 that we are still talking about these same
14 topics. So it's just a lip service, at
15 best.
16 And I think that really added to
17 when -- to -- you know, when you think
18 about trying to negotiate with these lines,
19 we felt that -- that the same -- results
20 were going to be the same as they have been
21 in the past, which is go along with
22 partisan lines, and that's what happened.
23 BY MR. TYSON:
24 Q. And just so the record is clear, when you
25 reference House Bill 481, that's referring to the

Heartbeat bill about abortion excess in Georgia, right?

A. That is correct.

MR. TYSON: Can we go off the record for just a minute?

THE VIDEOGRAPHER: The time is 3:46 p.m. and we are off the record.

(Recess taken.)

THE VIDEOGRAPHER: The time is 3:53 p.m. and we are back on the record.

MR. TYSON: Well, thanks everybody.

Representative Jackson, I don't have any further questions. I did want to just thank you. I know you served in the military for a long time and served in the state legislature, and I just appreciate your service to our country and our state. I don't have any further questions for you today. Thank you.

MS. RUTAHINDURWA: I don't have any questions as well.

THE WITNESS: All right. Thank you. Have a great 2023.

THE VIDEOGRAPHER: This concludes the video deposition of Derrick Jackson and we