EXHIBIT S

IN THE 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,	CIVIL ACTION NO. 1:21-CV-05337-SCJ
PLAINTIFFS,	
v.	
BRAD RAFFENSPERGER, IN HIS OFFICIAL CAPACITY AS SECRETARY OF STATE OF GEORGIA,	
DEFENDANT.	

VIDEO RECORDED DEPOSITION OF LISA HANDLEY
(TAKEN by DEFENDANT)
ATTENDING VIA ZOOM IN WASHINGTON, D.C.
FEBRUARY 16, 2023

ALSO PRESENT: Alison Bos
VIDEOGRAPHER: James Downie

REPORTED BY: Meredith R. Schramek
Registered Professional Reporter
Notary Public
(Via Zoom in Mecklenburg County, North Carolina)

Q And what's the other one?
A It's usually referred to as Kings EI or it's also been referred to as EI Iterative.
Q Okay. And is it your opinion that using that statistical analysis, you cannot determine whether party polarization better explains voting behavior than race polarization? That they can't be disentangled?
A That analysis tells me black and white voters are voting differently. It does not explain why they're voting differently.
Q Is it your opinion that in looking at the data that you provided that the combination of different races that you analyzed forecloses the ability for one to determine whether party better explains voter behavior than race?
A You'd have to repeat that. I'm sorry. I don't understand that question.
MR. JACOUTOT: No problem. Can the court reporter repeat it so I make sure we get it back the way I said it?
(Record read as requested.)
THE WITNESS: I would say that looking at democratic primaries takes race out of the equation and therefore provides some evidence that, at least in those contests, that party can't be explaining the

different voting patterns.
BY MR. JACOUTOT:
Q Okay. And so isn't another way of putting it that -- what you just said, that looking at democratic primaries actually controls for the party in determining -- I'll leave it at that.
A In a very narrow sense, yes.
Q What's narrow about it?
A You're looking at how people who chose to vote in the democratic primary are selecting candidates and therefore, they've already selected the party. They've all decided that they were Democrats. It doesn't explain why they've chosen to participate in the democratic primary versus the republican primary.
Q Okay. Does it matter -- strike that.
But I guess my -- to my question, though, that you said in a narrow sense I'm right when I phrase it this way, is it correct to say, though, that looking only at a party's primary elections controls for party in that analysis?
MS. LAKIN: Objection.
THE WITNESS: In the sense that everyone has -- everyone who's participating is of the same party, you are controlling for party.