EXHIBIT U

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,

Plaintiffs,

vs.

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

Defendant.

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

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VIDEO DEPOSITION OF

ADRIENNE JONES, Ph.D.

February 15, 2023

10:06 a.m.

Suite 200
1600 Parkwood Circle SE
Atlanta, Georgia

S. Julie Friedman, CCR-B-1476
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House Districts 171 and 173 are heavily Republican areas?

A. Again, I will accept your assertion of the same.

Q. Okay. Did you consider partisanship as a motivation for voter turnout?

A. No. Here, for the purposes of this report, I'm looking at voter turnout and tactic impact based upon race.

Q. Okay. But you can't rule out partisanship as a reason for lack of success of black candidates, can you?

MR. CHEUNG: Objection.

THE WITNESS: What's the question? I can't what?

Q. (By Ms. LaRoss) Okay. So you didn't consider partisanship as a -- as a motivation concerning turnout for purposes of this report?

MR. CHEUNG: Objection.

THE WITNESS: No. The focus of this report is race.

And to your sort of unstated point in a lot of instances about Democrats versus Republicans drawing the maps, I mean, depending on the time period, that's creating an

environment that's very similar, regardless of party in relationship to black voters in the state.

Q. (By Ms. LaRoss) So can you rule out part -- partner -- sorry -- partisanship as a reason for lack of success of black candidates?

A. Can I rule it out?

Q. Yeah.

A. I don't understand why. I don't understand. Like why would I need to rule it out?

Q. So -- So do you consider partner -- partisanship as a factor in the lack of success of black candidates?

A. Do I consider partisanship.

Say it again. Say it again.

MS. LaROSS: Just go ahead and read that back, if you would Julie.

(Whereupon, the record was read by the reporter as requested.)

THE WITNESS: I guess -- I guess the question is taking me off of what I'm presenting here, which is the State's influence or participation in making it difficult for black voters to vote in the state.

Partisanship has changed over time in the

state historically, so the focus isn't really here.

Like here, I'm not evaluating partisanship. I'm evaluating the impact of State, you know, State-authorized legislation, tactics, environment on the ability of black voters to access the polls in elections.

Q. (By Ms. LaRoss) So can you rule out partisanship as a factor?

A. I think you probably could, because, again, the partisanship balance of the state has shifted over time. Challenges for black voters have persisted, so yes. You could rule that out.

Q. Let's look at Page 52 of your report, and you state in your conclusion that the black Georgians have not been elected to the degree they should based on population, and that was changed in the second report to Black Georgians have not been elected to the degree that they would have, based on population, if they had equal and fair access to the state's electoral system.

Was that change made under the direction of counsel?

A. No.

But let me -- First, let me take a look