EXHIBIT C

UNITED STATES DISTRICT COURT
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 and JANICE STEWART,	CASE NO. 1:21-CV-05337-SCJ
Plaintiffs,	
vs.	
BRAD RAFFENSPERGER, in his official capacity as Secretary of State of Georgia,	
Defendant.	

VIDEOTAPED DEPOSITION OF JOHN B. MORGAN
(Taken by Plaintiffs)
February 9, 2023
9:40 a.m.

Suite 200
1600 Parkwood Circle
Atlanta, Georgia

Reported by: Debra M. Druzisky, CCR-B-1848

specifically, it is being elongated to get lower concentrations of black population in Spalding County into District 16 in the Cooper plan.

Q. But other districts are less elongated in -- among the four that you've chosen?

A. Some are, some aren't.

Q. Do you ever conclude in your report that Cooper's districts in this area do not comport with traditional districting principles?

A. I don't know that I explicitly said that in this area of the report.

Q. Is that your opinion?

A. I said in my opinion that there was a focus on race to the detriment of these other redistricting factors.

Q. But you're not saying that the plans are inconsistent with traditional districting principles?

A. I didn't say that. I don't think I said that anywhere in the report. I said that it -- I said what I said in the concluding statement, and in Paragraph 6, that it's focused on race to the detriment of those factors.

Q. So you're not concluding that the illustrative plans do not comport with traditional