

Pendergrass, Coakley, et al. v. Raffensperger, Brad, Et Al.

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1 IN THE UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF GEORGIA

3 ATLANTA DIVISION

4 ANNIE LOIS GRANT, et al.,

5 Plaintiffs,

6 vs.

CIVIL ACTION FILE NO.:

1:22-CV-00122-SCJ

7 BRAD RAFFENSPERGER, in his
8 official capacity as the
9 Georgia Secretary of State,
10 et al.,

11 Defendants.

12 (Appearance via Video Conference)

13 DEPOSITION OF: EUNICE SYKES

14 DATE: December 14, 2022

15 TIME: 10:00 a.m.

16 LOCATION: Home of Eunice Sykes
17 [REDACTED]

18 Locust Grove, Georgia

19 TAKEN BY: Counsel for the Defendants

20 REPORTED BY: Mary K. Stepp, Court Reporter

21 (Appearance via Video Conference)
22
23
24
25

1
2 APPEARANCES OF COUNSEL:

3 ATTORNEY FOR PLAINTIFFS:

4 (Appearance via Video Conference)

5 ELIAS LAW GROUP

6 MAKEBA RUTAHINDURWA, ESQUIRE

7 10 G Street NE

8 Washington, DC 20002

202.968.4490

mrutahindurwa@elias.law

9 ATTORNEY FOR DEFENDANTS:

10 (Appearance via Video Conference)

11 TAYLOR ENGLISH DUMA, LLP

12 HANNAH CLAPP, ESQUIRE

13 BRYAN JACOUTOT, ESQUIRE

14 1600 Parkwood Circle

15 Suite 200

16 Atlanta, Georgia 30339

17 678.336.7249

bjacoutot@taylorenghish.com

hclapp@taylorenghish.com

18 (INDEX AT REAR OF TRANSCRIPT)

1 MR. JACOUTOT: And this is Bryan
2 Jacoutot for the State Defendants. I just want to
3 put on record that an associate in our firm, Hannah
4 Clapp, who has not yet made an appearance in the
5 case, will be taking today's deposition. And I just
6 want to confirm with opposing counsel that that's
7 okay with them.

8 MS. RUTAHINDURWA: Okay with us.

9 MR. JACOUTOT: Great. Thank you. I'll
10 give it to you, Ms. Clapp.

11 MS. CLAPP: Thank you. This will be the
12 deposition of Ms. Eunice Sykes taken by Defendant,
13 Secretary of State Brad Raffensperger, and members of
14 the State Election Board for the purposes of
15 discovery and all purposes allowed under the Federal
16 Rules of Civil Procedure.

17 All objections except those going to the
18 form of the question and the responsiveness of the
19 answer are reserved until trial or the first use of
20 the deposition.

21 Are those stipulations agreeable to you?

22 MS. RUTAHINDURWA: Plaintiffs agree.

23 MS. CLAPP: Thank you. How do you wish to
24 handle signature?

25 MS. RUTAHINDURWA: We'll review and sign.

1 MS. CLAPP: Okay. Great. Thank you.

2 EUNICE SYKES,

3 having been duly sworn, testified as follows:

4 EXAMINATION

5 BY MS. CLAPP:

6 Q. Good morning, Ms. Sykes. My name's Hannah
7 Clapp. I'm an attorney with the law firm of Taylor
8 English Duma. As you know, I'm an attorney for the
9 defendants in this matter. The purpose of this
10 deposition is not to confuse you. So if I ask you a
11 question that you don't understand, can we agree that
12 you will let me know?

13 A. Yes.

14 Q. Great. For the court reporter, please
15 speak clearly and loud enough so that she can hear
16 you, and be sure to say yes and no, as opposed to
17 uh-huh or shaking your head yes or no. And try to
18 give audible answers as opposed to, like I mentioned,
19 nodding. Do you understand?

20 A. Yes.

21 Q. It's important that we also not speak at
22 the same time, especially since we are doing this
23 over Zoom. So please wait until I finish my question
24 before you answer.

25 If we need a break, please let me know.

1 But I'll ask you to answer the last question before
2 we take that break.

3 We also ask that you not have any
4 electronic devices available during your deposition,
5 including your cell phone, e-mail, iPad, your Wordle,
6 you know, anything like that. Do you have all that
7 cleared from your desk?

8 A. Yes.

9 Q. Okay. Great. Thank you. And certainly
10 you'll need to keep Zoom open on your computer, but
11 do you agree not to have your cell phone on and your
12 e-mail, text messaging, social media open during your
13 deposition?

14 A. Yes.

15 Q. Perfect. Great. I'm going to share my
16 screen now, if you'll give me just a moment.

17 (Defendant's Exhibit No. 1 was marked for
18 identification.)

19 BY MS. CLAPP:

20 Q. Ms. Sykes, can you see my screen?

21 A. Yes.

22 Q. Okay. Does this look like the notice to
23 take your deposition that you were served, I think it
24 was probably Monday?

25 A. Yes.

1 Q. I'll scroll to the second page as well.

2 Does this look accurate?

3 A. Yes.

4 Q. Okay. Great. I'll stop sharing.

5 So just a couple preliminary questions.

6 Ms. Sykes, have you ever testified before, whether
7 that be in trial or another deposition?

8 A. Yes.

9 Q. And in what setting was that?

10 A. It was 20 years ago in Cincinnati, Ohio.

11 Q. Okay. Was that for a trial or a
12 deposition?

13 A. A deposition.

14 Q. Do you remember what that case was about?

15 A. It was a car accident.

16 Q. It was a car accident. Was that your only
17 deposition?

18 A. Yes.

19 Q. So this will be your second deposition in
20 your entire life?

21 A. Yes.

22 Q. Okay. And have you taken any medications
23 that would keep you from fully and truthfully
24 participating in today's deposition?

25 A. No.

1 Q. And are -- do you have any medical
2 conditions that will also keep you from fully and
3 truthfully participating in today's deposition?

4 A. No.

5 Q. Have you ever been involved in any prior
6 lawsuits, whether that be you or a family member, in
7 any election-related cases?

8 A. No.

9 Q. And have you ever made any prior claims,
10 whether that be you or a family member, in any
11 election-related scenario or claim?

12 A. No.

13 Q. Have you ever been charged with a crime?

14 A. No.

15 Q. Have you ever been arrested?

16 A. No.

17 Q. And, also, have you ever been convicted of
18 a crime?

19 A. No.

20 Q. Okay. Perfect. And without going into
21 any of the details of anything that you've ever
22 discussed with your attorney, have you discussed this
23 case with anyone other than your lawyer?

24 A. No.

25 Q. Have you discussed this deposition with

1 anyone other than your lawyer?

2 A. No.

3 Q. It's probably not fun party banter, right?

4 A. I'm sorry?

5 Q. Did you review anything to prepare for
6 this deposition?

7 A. No. I talked to my attorney.

8 Q. Okay. Did you review the Complaint or the
9 Second Amended Complaint?

10 A. Yes. Yes.

11 Q. Did you review one or both?

12 A. One.

13 Q. Okay. Was it the Second Amended
14 Complaint?

15 A. Yes.

16 Q. Thank you. Did those documents help you
17 refresh your recollection as to the events that you
18 will testify as to here today?

19 A. Yes.

20 Q. And do you have any documents or notes
21 with you today?

22 A. No.

23 Q. Do you have any notes or memos or other
24 documents that relate in any way to this case?

25 A. No.

1 Q. So nothing that you have previously
2 provided to your attorney?

3 A. No.

4 Q. Relative to -- okay. All right. Now I
5 need to go into some background about you, Ms. Sykes.
6 Can you give me your full name and current address
7 for the record?

8 A. Eunice Sykes, [REDACTED], Locust
9 Grove, Georgia [REDACTED]

10 Q. All right. Since we're doing a Zoom
11 deposition, can you state for the record the address
12 from which you're taking your deposition?

13 A. [REDACTED], Locust Grove, Georgia

14 [REDACTED]

15 Q. Okay. Great. Thank you. And how long
16 have you lived at that address?

17 A. 17 years.

18 Q. 17 years. That's a long time.

19 A. It is.

20 Q. Do you like living down there?

21 A. I do.

22 Q. All right. So, what year would you say
23 you moved in? Attorneys are notoriously bad at math.
24 So if you would just state for the record what year
25 you moved in.

1 A. 2006.

2 Q. 2006. And what month was that?

3 A. July.

4 Q. July. And before 2006, were you still in
5 the state of Georgia?

6 A. No.

7 Q. Where did you move from?

8 A. Pennsylvania.

9 Q. What part of Pennsylvania?

10 A. Pittsburgh.

11 Q. Were you just moving to get away from the
12 cold weather?

13 A. I was retiring.

14 Q. Retiring. Congratulations, even though
15 it's been several years. What made you pick Georgia?

16 A. Better weather.

17 Q. For the most part, other than these gray,
18 rainy days.

19 A. We have more sunny, blue sky days here
20 than we do rainy days.

21 Q. Yeah, that's true. Have you resided at
22 any other addresses in Locust Grove or Henry County?

23 A. No.

24 Q. And just to state for the record, your
25 address, is it located in Henry County, Georgia?

1 A. Yes.

2 Q. Thank you. So during the time that you've
3 lived in Georgia, have you ever split your time
4 between residences? For instance, were you -- did
5 you have a home here, while you also had a home in
6 Pennsylvania or --

7 A. Can you excuse me for one minute?

8 Q. Yes, ma'am.

9 A. I'm sorry. I had the coffee pot on and it
10 was about to go off.

11 Q. Oh, that's okay. I'll repeat my question.

12 A. Okay.

13 Q. During the time that you've lived at your
14 residence in Henry County, did you ever split time
15 between residences, say here and Pennsylvania, or
16 were you solely here in Georgia?

17 A. I split time between here and
18 Pennsylvania --

19 Q. Okay.

20 A. -- for three months.

21 Q. What was that last bit?

22 A. For three months.

23 Q. For three months. And what time period
24 was that?

25 A. That was the summer of '06.

1 Q. Why were you splitting time between
2 Pennsylvania and Georgia?

3 A. I was finishing up some work from there.

4 Q. What kind of work were you finishing?

5 A. I was in purchasing supply chain.

6 Q. Who was that with?

7 A. PNC Bank.

8 Q. Okay. I'll ask you a little bit more
9 about that later. I'm very interested in your --
10 your background. I saw that you were an author
11 online. So I -- loads of questions for you.

12 So, do you own the property in Henry
13 County?

14 A. Yes.

15 Q. Have you owned it since 2006?

16 A. Yes.

17 Q. Has anyone else owned the property with
18 you?

19 A. Yes.

20 Q. And who is the other owner?

21 A. John Sykes.

22 Q. So, at the time of filing the initial
23 Complaint, which would have been January 11th, 2022,
24 was your Henry County residence your sole residence?

25 A. Yes.

1 Q. Okay. And do you own any other
2 properties?

3 A. No.

4 Q. I can see that your attorney is not there
5 with you, but is there anyone else there with you?

6 A. No.

7 Q. Okay. All right. Ms. Sykes, can you tell
8 me a little bit about your educational background?

9 A. I have a master's degree in curriculum and
10 instruction, University of Dayton.

11 Q. I'm sorry, could you repeat what your
12 master's is in?

13 A. Curriculum and instruction.

14 Q. Okay. Were you an educator at one point?

15 A. Briefly.

16 Q. Briefly. How long was that?

17 A. Four years.

18 Q. Uhm, sorry about that. What level did you
19 teach?

20 A. High school.

21 Q. All right. And where did you go to high
22 school?

23 A. In Weirton, West Virginia.

24 Q. Could you spell that for me?

25 A. W-e-i-r-t-o-n.

1 Q. West Virginia?

2 A. Uh-huh.

3 Q. And what year did you graduate?

4 A. 1965.

5 Q. And where did you attend undergraduate?

6 A. West -- well, my undergrad degree is from
7 Chicago State University.

8 Q. So you lived everywhere possible that it's
9 extremely cold and then you ended up in Georgia. It
10 makes sense now.

11 A. (Nods head.)

12 Q. What year did you graduate from Chicago
13 State?

14 A. 1975.

15 Q. And what was your undergrad degree in?

16 A. Business education.

17 Q. Okay. Aside from your bachelor's in
18 business education and your master's in curriculum
19 and instruction, do you have any other education?

20 A. No.

21 Q. Do you have any other kind of training,
22 like certificates or anything like that?

23 A. No.

24 Q. Do you have any kind of teaching license?

25 A. I used to. No.

1 Q. Used to. What time period?

2 A. The time that I was teaching, '75 through
3 '80.

4 Q. Okay. All right. Now I'd like to ask
5 about your employment history. Can you start from
6 the very beginning? What was your first job?

7 A. I worked for Weirton Steel Corporation as
8 a clerk.

9 Q. What kind of company was that?

10 A. Steel manufacturing.

11 Q. Steel. Okay. And what time period were
12 you there as a clerk?

13 A. Uhm, I went back and forth with that job.
14 So my first time here it was like 1966 through '68,
15 something like that.

16 Q. What was the other job you were back and
17 forth between?

18 A. Then I got married and moved away. And I
19 came back and I worked for them again.

20 Q. Where did you move to, whenever you got
21 married?

22 A. Tennessee.

23 Q. What part of Tennessee?

24 A. Nashville.

25 Q. And what time period was that?

1 A. '69 through '71.

2 Q. All right. So when you came back from
3 Nashville, you were working at Weirton Steel
4 Corporation, did you come back as a clerk?

5 A. When I came back, I didn't go back to work
6 then. I was going -- I was on my way to California.

7 Q. Okay. And what part of California?

8 A. Oakland.

9 Q. And what time period?

10 A. Uhm, '69, '70. Might have been -- '70, I
11 think it was, through '72.

12 Q. Were you working, when you were in
13 California?

14 A. No.

15 Q. Okay. So after you were living in
16 Oakland, California -- Oakland, California, where did
17 you move?

18 A. Chicago.

19 Q. And is this when you enrolled in your
20 master's program?

21 A. No.

22 Q. Is this when you enrolled in your business
23 education program?

24 A. I was finishing up my business education
25 program.

1 Q. Okay. Was your husband also in school at
2 the time or was he working?

3 A. He was working.

4 Q. All right. So it looks like, from what
5 you told me, you went directly to your master's
6 program right after your bachelor's program; is that
7 correct?

8 A. No, I worked some years.

9 Q. Okay.

10 A. And then I got a bachelor's -- master's.

11 Q. What did you -- what kind of work did you
12 do in that time period between your bachelor's and
13 master's?

14 A. I was back in the steel manufacturing
15 company.

16 Q. Okay. All right. What was your next job
17 after steel manufacturing?

18 A. Teaching.

19 Q. Teaching?

20 A. Uh-huh.

21 Q. Did you like teaching?

22 A. I did.

23 Q. What made you want to give it up?

24 A. My daughter got sick.

25 Q. Oh, I'm sorry to hear that. I know how

1 important it is to take care of family.

2 A. It is.

3 Q. So what time period did you retire from
4 teaching?

5 A. I left teaching -- that would have
6 been '90 -- no, that wasn't '90. It was in the '80s.

7 Q. Okay.

8 A. Early '80s, late '70s.

9 Q. And where were you living, at the time?

10 A. In Weirton, West Virginia.

11 Q. And what time period did you move from
12 Weirton?

13 A. I left Weirton in '81.

14 Q. All right. And where did you go after
15 that? I don't think you've told me yet.

16 A. Cincinnati, Ohio.

17 Q. Cincinnati. And what were you doing in
18 Cincinnati?

19 A. I was working as a consultant. And then I
20 worked for gas and electric company.

21 Q. And what time period was this?

22 A. Say that again?

23 Q. What time period was this?

24 A. It was '81 through 2000.

25 Q. So you were living in Cincinnati from

1 about '81 to 2000?

2 A. Let me get that straight. I was in
3 Cincinnati for 16 years.

4 Q. Uh-huh.

5 A. Okay. So that would have been through
6 2000, yes.

7 Q. Okay. So you moved there in about '84?

8 A. Yeah, that's right.

9 Q. Okay. See, I can do some math.

10 A. (Nods head.)

11 Q. All right. 2000. What's going on in 2000
12 that made you move?

13 A. Got a job in Texas.

14 Q. What kind of job did you get?

15 A. I was working for an internet company.

16 Q. Do you remember which company?

17 A. It's called Pentelos (ph).

18 Q. And what time period were you there?

19 A. Uhm, 2000 to about 2003, 2004.

20 Q. What were you doing for them? You said --
21 were you a consultant?

22 A. It was internet e-commerce.

23 Q. Okay. Is that when you left Texas, 2003?

24 A. Yes.

25 Q. And where did you go after that?

1 A. I came to Kentucky.

2 Q. What part of Kentucky?

3 A. Union.

4 Q. So from 2003 to about what year were you
5 living in Union, Kentucky?

6 A. Uhm, 2005, maybe. 2005.

7 Q. And what were you doing for work in
8 Kentucky?

9 A. I was a consultant.

10 Q. For what kind of company?

11 A. It was a construction company.

12 Q. You've been in all kinds of industries.
13 What's your favorite one so far?

14 A. Retirement.

15 Q. Retirement. Good answer.

16 Okay. So after you were a consultant for
17 a construction company in 2005, did you leave
18 Kentucky?

19 A. Yes.

20 Q. Okay. Where did you go after that?

21 A. Pennsylvania.

22 Q. And did you go straight to Pittsburgh?

23 A. Yes.

24 Q. Okay. And how long were you in
25 Pittsburgh?

1 A. Two years.

2 Q. So 2005 to about 2007?

3 A. Yes.

4 Q. And then that's when you moved to Georgia?

5 A. Yes.

6 Q. Okay. And what were you doing in
7 Pittsburgh?

8 A. I was working for PNC Bank.

9 Q. And you moved to Georgia for work as well?

10 A. No, I moved to Georgia because I left the
11 workforce.

12 Q. Okay. All right. And did you resign from
13 most of these positions or were you terminated from
14 any of them?

15 A. I resigned from most of them.

16 Q. Do you remember which ones you were
17 terminated from?

18 A. I was laid off.

19 Q. Okay.

20 A. From the internet position.

21 Q. Did they tell you why you were laid off?

22 A. Internet. In the early 2000s.

23 Q. Yeah, kind of a weird time period --
24 interesting time period to be working for an internet
25 company.

1 All right. And were you part time or full
2 time for these positions?

3 A. I was full time.

4 Q. For all of them?

5 A. Yes.

6 Q. All right. Moving on to your voter
7 registration history. Even more exciting than your
8 employment history. Are you registered to vote in
9 Georgia?

10 A. Yes.

11 Q. Do you remember where you registered to
12 vote?

13 A. Henry County.

14 Q. Was it in person, by mail?

15 A. In person.

16 Q. Okay.

17 A. Likely. It may have been by mail.

18 Q. Did you register when you immediately got
19 to Georgia?

20 A. Yes.

21 Q. So you registered in 2007?

22 A. Yes.

23 Q. Okay. Did you ever register anywhere else
24 you lived?

25 A. I have probably registered wherever I've

1 lived.

2 Q. Okay.

3 A. Uhm --

4 Q. Can you say with certainty any of the
5 locations in particular?

6 A. No, I cannot say with certainty.

7 Q. Okay. And are you registered to vote at
8 your current address?

9 A. Yes.

10 Q. All right. And do you know what district
11 you resided in before the recent redistricting took
12 effect?

13 A. No.

14 Q. And have you voted in each election since
15 you've been registered to vote in Georgia?

16 A. Yes.

17 Q. So have you voted in the presidential
18 primary elections?

19 A. Yes.

20 Q. Have you voted in general primary
21 elections?

22 A. Yes.

23 Q. Have you voted in special elections?

24 A. Yes.

25 Q. And do you know what precinct you voted in

1 for the November 2022 election?

2 A. I don't know, no.

3 Q. I don't think I'd know my precinct off the
4 top of my head either. And how about the runoff, do
5 you know the precinct for that?

6 A. Same precinct.

7 Q. And do you remember what kind of location
8 it was?

9 A. It was the library.

10 Q. The library. Which library?

11 A. It was actually the voter office on
12 Atlanta Street and McDonough, because I early voted.

13 Q. For both the regular election and the
14 special -- the runoffs?

15 A. (Nods head.)

16 Q. Okay. We already covered this, I think,
17 but have you voted in any other state?

18 A. Yes.

19 Q. Which states?

20 A. Most of them.

21 Q. And can you recall any years those voter
22 registrations were active?

23 A. I don't understand.

24 Q. So, the previous states that you've lived
25 in, do you know what years those voter registrations

1 would have been active?

2 A. My voter registration?

3 Q. Yes, ma'am.

4 A. I cannot recall.

5 Q. Do you recall being generally active in
6 voting?

7 A. Yes.

8 Q. So when you moved to Georgia, your voting
9 habits didn't change?

10 A. No.

11 Q. You continued to stay active?

12 A. Yes.

13 Q. Okay. And would those registrations be
14 under your name, Eunice Sykes, or would they be under
15 a different name, say before you got married or
16 anything like that?

17 A. Yeah, they could be under other names.
18 But they have been under Eunice Sykes for the last 17
19 years.

20 Q. Do you know what names they could possibly
21 be under?

22 A. Yes.

23 Q. What names would those be?

24 A. Uhm, West, W-e-s-t. Lawyer, L-a-w-y-e-r.

25 Q. Any others?

1 A. No.

2 Q. Okay. Thank you. All right. Moving on
3 to your political affiliations. Are you currently
4 involved in any political or activist organizations?

5 A. No.

6 Q. So you have no leadership positions or
7 anything like that?

8 A. No.

9 Q. Okay. Do you consider yourself to be a
10 member of the Democratic party?

11 A. Yes.

12 Q. And since when?

13 A. All my life.

14 Q. And have you held any leadership positions
15 in the Democratic party?

16 A. No.

17 Q. Have you served on any committees for the
18 Democratic party?

19 A. No.

20 Q. Have you participated in any activities of
21 the Democratic party?

22 A. No.

23 Q. Have you ever considered yourself to be a
24 member of the Republican party?

25 A. No.

1 Q. And is it fair to say you generally
2 support Democratic candidates for election here in
3 Georgia?

4 A. Yes.

5 Q. Have you ever voted for a Republican
6 candidate?

7 A. No.

8 Q. And have you ever been a member or held a
9 position in any other political party?

10 A. No.

11 Q. Have you worked on any political
12 campaigns?

13 A. No.

14 Q. Ms. Sykes, you're making this easy for me.
15 Are you involved with any voter advocacy groups?

16 A. No.

17 Q. Sorry. Could you repeat that?

18 A. No.

19 Q. Okay. Thank you. All right. Now,
20 talking about your case. When did you first learn
21 about this lawsuit?

22 A. Probably back in the summer.

23 Q. Summer of what year?

24 A. 2022.

25 Q. To confirm, the Complaint was filed in

1 January of 2022, correct?

2 A. Yes.

3 Q. Okay. And you found out about the lawsuit
4 in the summer of 2022?

5 A. It was sometime during this year. I don't
6 know for sure.

7 Q. Okay. And who did you learn about the
8 suit from?

9 A. I got an e-mail. Or it might have been a
10 phone call. I'm sorry.

11 Q. Can you describe the phone call? As long
12 as it's not from your attorney or any attorney that
13 you've hired, can you describe the phone call?

14 A. I don't know who called. They identified
15 themselves, they talked about the case, they asked me
16 if I had any feelings about it. I said, Yes, I
17 support what you're doing. And that was pretty much
18 the nature of the call, if that was a call.

19 Q. What happened after that?

20 A. Then there was some subsequent
21 communications. Mostly e-mails.

22 Q. Do you remember who you were e-mailing
23 with?

24 A. The latter part, I was e-mailing with my
25 attorney.

1 Q. Okay. Do you know if the person that
2 called you was with a particular political party or
3 voter advocacy group?

4 A. I don't remember. It was probably -- it
5 was probably from an attorney's office.

6 Q. Why do you say that?

7 A. I don't answer all my phone calls. I
8 think this one had an ID on it.

9 Q. So you saw it was from an attorney's
10 office and you picked up the phone?

11 A. Yes.

12 Q. So what made you decide to sign on and sue
13 the Secretary of State?

14 A. Because I recognized some of the voter
15 irregularities that were going on.

16 Q. Can you elaborate?

17 A. The shutting down -- making it hard for
18 others to vote, for people -- marginalized
19 individuals were finding it hard to vote and were
20 getting discouraged. And I witnessed that. So I
21 thought it was a worthy cause.

22 Q. Did you do any research concerning the
23 issues in this case before signing on?

24 A. No. I was aware of what was going on.

25 Q. All right. Is there any kind of contract

1 for you signing on to this case?

2 A. Say that again.

3 Q. Is there any kind of contract for you
4 signing on to this case?

5 A. No.

6 Q. Are you being paid?

7 A. No.

8 Q. Have you received anything of value in
9 exchange for your participation as a plaintiff in
10 this case?

11 A. No.

12 Q. All right. Ms. Sykes, I'd like to share
13 my screen again.

14 (Off-record discussion.)

15 MS. CLAPP: Now I'm displaying for
16 Ms. Sykes the Second Amended Complaint, which I'd
17 like to mark as Exhibit 2.

18 (Defendant's Exhibit No. 2 was marked for
19 identification.)

20 BY MS. CLAPP:

21 Q. Ms. Sykes, have you seen this document
22 before? I'll scroll through it before you answer, if
23 you'll give me just a moment.

24 Your name is in paragraph 16. Have you
25 seen this document before?

1 A. Yes.

2 Q. Okay. When did you see it?

3 A. Uhm, probably within the last month or so.

4 Q. So is it safe to say you saw it in the
5 month of November?

6 A. Yes.

7 Q. And have you read this document in its
8 entirety?

9 A. No.

10 Q. So you don't know the specifics of the
11 allegations contained in this document?

12 A. I -- I know the general specifics, yes.

13 Q. Okay. Would you describe the general
14 allegations made in the complaint, as to your
15 understanding?

16 A. Uhm, this is about redistricting, drawing
17 lines across the state that make it difficult for
18 minorities to show up to vote. And it makes it
19 difficult for them to be a part of the voter process
20 by way of certain things that are happening. Like
21 standing in long lines and not being able to take
22 breaks, that sort of thing.

23 Q. Are you at a minimum familiar with this
24 paragraph in which you're mentioned, this paragraph
25 16?

1 A. Yes.

2 Q. And would you agree with its
3 representations of your position in this matter?

4 A. Yes.

5 Q. Now, did you reach out to any legislators
6 during the 2021 special session concerning the
7 redistricting issues raised in your complaint?

8 A. No.

9 Q. How about before the special session?

10 A. I am a member of an organization that
11 stays in touch with our legislators on the various
12 issues in the State of Georgia.

13 Q. What organization would that be?

14 A. It's a sorority.

15 Q. Okay. What sorority is that?

16 A. Alpha Kappa Alpha sorority.

17 Q. Do you hold any leadership positions with
18 them?

19 A. No.

20 Q. And what year did you become a member?

21 A. I've been a member all my life. For
22 years.

23 Q. Is that something you joined in undergrad?

24 A. No. Grad.

25 Q. Oh, you were a grad. Sorry.

1 A. And I didn't join. You don't join a
2 sorority.

3 Q. How did you become a member?

4 A. You are selected and invited to become a
5 member.

6 Q. Okay. Thank you for clarifying that. I
7 wasn't sure how that process worked.

8 All right. So you mentioned that you
9 were -- the organization, Alpha Kappa Alpha...

10 THE REPORTER: I'm sorry. Ms. Clapp, my
11 internet just froze on me and so I missed what you
12 just said.

13 MS. CLAPP: Okay. I had asked Ms. Sykes
14 if the organization Alpha Kappa Alpha was involved in
15 reaching out to legislators. She responded and said
16 that that was one of the things -- one of the many
17 things that they do.

18 BY MS. CLAPP:

19 Q. Is that correct, Ms. Sykes?

20 A. Yes.

21 Q. Okay. Thank you. And do you know who
22 Alpha Kappa Alpha would have reached out to?

23 A. No.

24 Q. Do you know who at Alpha Kappa Alpha would
25 have reached out to someone?

1 A. We have various committees that are
2 charged to work in various community service
3 organizations. So we have ties to our state
4 legislators, state congressmen.

5 Q. Can you describe what you mean by you have
6 ties to them?

7 A. I said they, we. The organization has
8 those ties.

9 Q. But can you describe how the organization
10 has ties?

11 A. So, we have a day at the capitol and each
12 of us is invited to stay in touch with our local
13 officials. We have local officials who are members
14 of the sorority. That's it.

15 Q. It's really great that you guys stay so
16 involved. I know a lot of people join sororities in
17 college and as a graduate, and that's the only time
18 they spend with that organization. So it's great
19 that you spend time developing that and continuing
20 with the mission.

21 Do you know if anyone from Alpha Kappa
22 Alpha testified in the Georgia assembly on these
23 redistricting issues?

24 A. No.

25 Q. And did you personally attend any hearings

1 in the Georgia legislature pertaining to
2 redistricting?

3 A. No.

4 Q. And did you attend any other meetings
5 concerning redistricting in 2021?

6 A. No.

7 Q. And do you know what the term "community
8 of interest" means?

9 A. Say that again.

10 Q. Do you know what the term "community of
11 interest" means?

12 MS. RUTAHINDURWA: I'm going to object to
13 the extent it calls for a legal conclusion. You can
14 answer.

15 BY MS. CLAPP:

16 Q. Ms. Sykes, you can answer.

17 A. Do I know what the term "community of
18 interest" means?

19 Q. Yes, ma'am.

20 A. Is that the question? I can guess at it.
21 It is an interest in the community activities.

22 MS. RUTAHINDURWA: Counsel, do you want to
23 stop sharing your screen?

24 MS. CLAPP: Thank you. I totally forgot.
25 Got carried away.

1 BY MS. CLAPP:

2 Q. Ms. Sykes, how would you describe your
3 community?

4 A. It's a close-knit community. Most people
5 know each other at least by face. We're all
6 geographic democratic -- excuse me, the demographics
7 are pretty similar.

8 Q. In what way?

9 A. There are professionals who have moved
10 here from other areas, who come together to talk
11 about community issues and what to do about them.

12 Q. And where would you say you are from?

13 A. I would say that I was from the Pittsburgh
14 area.

15 Q. Really? You're going to claim Pittsburgh?

16 A. Yes.

17 Q. Okay. What is that based on?

18 A. That's where I spent the majority of my
19 life, even though I traveled around. Locally, you
20 know, I like to just say that I'm from Georgia. But
21 people always ask -- because so many Georgians are
22 from someplace else -- where you were raised.

23 Q. So you mentioned you're part of a
24 close-knit community. Do you or have you
25 participated in any neighborhood or community

1 associations?

2 A. Yes.

3 Q. What kind of community associations?

4 A. I'm a member of my homeowners'
5 association.

6 Q. Okay.

7 A. I'm a member of a church.

8 Q. Where is that church located?

9 A. In McDonough, Georgia.

10 Q. About how far is that from your home?

11 A. Minutes.

12 Q. Minutes. That's good. Are you very
13 active with them?

14 A. Yes.

15 Q. And are you very active with your
16 homeowners' association?

17 A. Yes.

18 Q. Do you have a leadership role with the
19 homeowners' association?

20 A. No.

21 Q. Do you regularly attend any kind of church
22 services at another place of worship?

23 A. No. You mean, besides the one I just
24 mentioned?

25 Q. Yes, ma'am.

1 A. No.

2 Q. Okay. And are you involved with any
3 activities or groups with your church?

4 A. Yes.

5 Q. And what would those be?

6 A. I'm a member of the usher board. I am a
7 member of the church anniversary. Those are my
8 current roles.

9 Q. Thank you. Are you involved with any
10 school associations or activities?

11 A. Any what?

12 Q. School associations or activities?

13 A. School?

14 Q. School.

15 A. Okay. No.

16 Q. And you already mentioned you're not
17 involved with any leadership positions with Alpha
18 Kappa Alpha; is that correct?

19 A. That's correct.

20 Q. Okay. But you are involved?

21 A. Yes.

22 Q. And where are the Alpha Kappa Alpha
23 activities held?

24 A. In Georgia.

25 Q. Is there a particular location?

1 A. We're in Stockbridge.

2 Q. I'm sorry, could you repeat that?

3 A. Stockbridge and Riverdale.

4 Q. Thank you. All right. Outside of work
5 and church, where do you spend most of your time?

6 A. Home. I'm a golfer.

7 Q. A golfer. How did you get into golfing?

8 A. My husband introduced me to the game.

9 Q. Oh, that's so nice. Someone told me once
10 it's really good to have a hobby with your partner,
11 so I'm glad you guys have golfing. But sometimes it
12 can be a bad thing if you're really good.

13 A. Well, he was smart enough to introduce me
14 to the game, but to also suggest that I take lessons.

15 Q. Uh-huh.

16 A. He's a wise man.

17 Q. Did you end up beating him more often than
18 not?

19 A. No. I know how to play that game.

20 Q. Okay. All right. Moving on to my next
21 section. Have you ever been prohibited from
22 registering to vote based on your race?

23 A. No.

24 Q. Have you ever been prohibited from
25 participating in the political process based on your

1 race?

2 A. No.

3 Q. Do you have any personal knowledge of
4 discrimination by the government of Georgia against
5 members of a minority group related to participation
6 in the democratic process?

7 A. Can you repeat that?

8 Q. Yes, ma'am. It was a long question, sorry
9 about that. Do you have any personal knowledge of
10 discrimination by the government of Georgia against
11 members of a minority group related to participation
12 in the democratic process?

13 A. Personal. No.

14 Q. You stressed personal. Do you have other
15 knowledge?

16 A. It was repeating -- I was repeating
17 something that you said. Personal knowledge.

18 Q. Got it.

19 A. But, yeah, I do know of people who have
20 been -- they showed up to vote and they were told to
21 go to another precinct. And people don't understand
22 that. And they get upset. And those people often
23 end up not voting at all. A deterrent.

24 Q. Why do you think they end up not voting?

25 A. Because they are disgusted that they've

1 made the effort to come and vote where they thought
2 they were entitled, only to be told that they need to
3 go somewhere else to vote. And they're often on
4 their way to work. Or they've often stood in the
5 rain and the sleet and the cold, early mornings, all
6 to get inside and to be told that they're at the
7 wrong spot. Discouraging.

8 Q. Was this recent?

9 A. Say that again.

10 Q. Was this recent?

11 A. Well, that happens often. But, yeah,
12 something that was recent.

13 Q. All right. Do you know what racially
14 polarized voting is?

15 A. I have a sense of what that is, yes.

16 Q. What's your understanding of it?

17 A. When the voting numbers show that in a
18 certain geographical area there are certain people
19 who vote there and there's an attempt to change that.
20 And that, you know, people look at the maps and see
21 where people, my ethnicity, certain different
22 demographics are voting.

23 Q. So is it, in your opinion, that black
24 voters in Georgia generally vote for democratic
25 candidates?

1 A. Yes.

2 Q. Is that just from personal experience?

3 A. Yes.

4 Q. And do you personally know of any black
5 voters who have told you that they have voted for
6 Republican candidates?

7 A. Yes.

8 Q. All right. Do you know if Georgia uses a
9 majority vote requirement in its elections?

10 A. I don't know what that means.

11 MS. CLAPP: Okay. All right. I'm going
12 to use this as a quick stopping point. Can we take a
13 five-minute break?

14 THE WITNESS: Yes. I was about to ask for
15 one. Thank you so much.

16 (Recess was taken from 10:54 a.m. to 11:02
17 a.m.)

18 BY MS. CLAPP:

19 Q. Ms. Sykes, thanks for coming back.

20 A. Get squared away here. Okay.

21 Q. Ms. Sykes, are you ready?

22 A. Uh-huh.

23 MS. CLAPP: Okay. Ms. Stepp, I'm ready
24 when you are.

25 THE REPORTER: I am. I'm ready.

1 BY MS. CLAPP:

2 Q. Before we took a short break, we were
3 talking about the majority vote requirements. So,
4 Ms. Sykes, the majority vote requirement is when the
5 state requires just a simple majority vote to pass a
6 measure.

7 Would you agree that a majority vote
8 requirement is what led to the runoff in 2021?

9 A. Yes.

10 Q. Okay. And that resulted in the election
11 of Senator Warnock and Senator Ossoff, correct?

12 A. Yes.

13 Q. And those were candidates that you
14 supported, correct?

15 A. Yes.

16 Q. Hopefully this doesn't feel like too much
17 of a vocabulary quiz, but are you familiar with the
18 term "candidate slating process"?

19 A. Candidate what?

20 Q. Candidate slating process.

21 A. Uhm, no.

22 Q. Okay. It's mentioned in your complaint at
23 paragraph 34(d). Paragraph 34(d) states, "That one
24 of the Senate factors include the exclusion of
25 members of the minority group from candidate slating

1 processes."

2 So the candidate slating process is where
3 a group of candidates run to -- basically in a
4 multi-position election on a common platform. So, do
5 you think there is a candidate slating process in
6 Georgia?

7 A. Yeah, I'm -- I'm pretty unclear about
8 that.

9 Q. Okay. If you don't know, I don't know is
10 a perfectly good answer.

11 A. Okay.

12 Q. So, do you know if there is a candidate
13 slating process in Georgia?

14 A. I would guess that there is, but I don't
15 know.

16 Q. Okay. And to your best guess, would
17 members of a minority group have been denied access
18 to that process?

19 A. I don't know.

20 Q. Okay. So in your opinion does a lack of
21 education keep people of color from participating in
22 Georgia politics?

23 A. To some extent, yes.

24 Q. Can you explain in what way?

25 A. If candidates are in close connection with

1 people in their districts, then people may feel left
2 out of the process. Or if advocacy groups don't
3 reach out into those communities to educate, to raise
4 awareness, then I don't think we've done our job as
5 citizens in allowing that to happen.

6 We have open rural areas that don't have
7 the communication tools that others have, that
8 prohibits them from taking full advantage of all of
9 the information as well.

10 Q. I mean, do you have any personal
11 experience or exposure to this?

12 A. No.

13 Q. Do you believe that a lack of employment
14 opportunities keep people of color from participating
15 in Georgia politics?

16 A. To some extent that could -- that could be
17 possible.

18 Q. What do you mean, "to some extent"?

19 A. Well, lack of employment opportunities can
20 be directly tied to a candidate's slate. And people
21 need to see and have hope that their situations are
22 going to get better. And -- but that's part of the
23 process. I think that could be improved.

24 Q. Do you have any personal experience with
25 this, whether that be yourself or friends?

1 A. Yeah. People need to be engaged early on,
2 and so those advocacy groups tend to want to make
3 that happen.

4 Q. How is that related to lack of employment
5 opportunities, though?

6 A. Because when a person doesn't feel hopeful
7 about their employment opportunities, then their mind
8 is somewhere else. It's not on who the candidates
9 are, unless that candidate is actively engaged in
10 trying to make that better for them. In that way
11 it...

12 Q. Okay. Thank you. Does a lack of access
13 to healthcare services, in your opinion, keep people
14 of color from participating in Georgia politics?

15 A. It could, yes.

16 Q. How?

17 A. Well, again, if there's no priority in
18 their admitting style that comes through elected
19 officials, then that creates a barrier that someone
20 or something needs to tackle.

21 Q. Does this affect people of color in
22 particular?

23 A. It could.

24 Q. And do you have any personal experience of
25 this?

1 A. No. No personal experience.

2 Q. Okay. And are you familiar with the term
3 "racial appeals," when used in the context of
4 elections?

5 A. Racial?

6 Q. Racial appeals.

7 A. No.

8 Q. So you wouldn't be able to recognize it,
9 if you saw it?

10 A. Not unless someone gave me some insight on
11 it.

12 Q. All right. I think one example that has
13 been used in the news would be like Kelly Loeffler,
14 darkening the skin of Senator Warnock to use a racial
15 appeal to voters.

16 A. In a negative sense?

17 Q. It can be a negative or a positive sense.
18 Do you have any understanding of how racial appeals
19 are used now?

20 A. I can see how that would work, yes, yes.

21 Q. Okay. Have you personally seen any
22 campaigns in Georgia characterized by racial appeals?

23 A. No, not personally. Huh-uh.

24 Q. Are there any other racial appeals that
25 you know of?

1 A. Uhm, no. I do recall hearing about one,
2 but I don't recall it off the top of my head right
3 now.

4 Q. Okay. Have you seen a similar treatment
5 of -- well, I guess if you haven't seen other racial
6 appeals, then you wouldn't have an answer to this
7 question. But for the record, have you seen the
8 similar treatment of Republican white and black
9 candidates?

10 A. No.

11 Q. Okay. We're getting close to the end, I
12 promise. Do you know how many black people have run
13 for office in Georgia?

14 A. No.

15 Q. Do you know how many black people have
16 been elected to office -- or public office in
17 Georgia?

18 A. No.

19 Q. All right. And did you know that the
20 former Chief Justice of the Georgia Supreme Court was
21 black, and that position is an elected one?

22 A. No.

23 Q. And then are you aware of in 2021, Senator
24 Warnock, a black candidate, was elected statewide to
25 the United States Senate?

1 A. Yes.

2 Q. And then are you aware that Herschel
3 Walker, another black candidate, ran on the
4 Republican ticket and was elected by a wide margin in
5 the Republican primary by exclusively Republican
6 voters?

7 A. Yes.

8 Q. Then are you aware that the United States
9 Senate is a statewide office and that both major
10 political parties were represented by black -- or by
11 people who are black?

12 A. Yes.

13 Q. Okay. This is where I want to hear a
14 little bit more from you, Ms. Sykes. So, are there
15 any needs of the minority community in Georgia that,
16 in your opinion, differ from those of the white
17 residents of Georgia?

18 A. My answer to that question would be, I
19 think if they were just equitably treated the same
20 across the board, those needs would be met.

21 Q. So you say if equitably treated, those
22 needs -- across the board, those needs would be met.
23 To what needs are you referring?

24 A. The needs for fair employment, the need
25 for medical insurance, those things would be more

1 accessible.

2 Q. And what are particular needs of the
3 minority community in Georgia, in your view?

4 A. Equitable housing, equitable opportunities
5 for employment, equitable education, equitable
6 insurance.

7 Q. And what's that based on?

8 A. Education.

9 MS. RUTAHINDURWA: Objection, ambiguous.

10 BY MS. CLAPP:

11 Q. All right. What is your position that
12 equitable housing is a particular need of the
13 minority community in Georgia?

14 A. Say that again.

15 Q. So, your opinion is that one particular
16 need of the minority community in Georgia is more
17 equitable housing. What is that based on?

18 A. When you drive 75 North, you can see what
19 that's based on. You have pockets of poverty across
20 the city that are predominantly African-American or
21 people of color occupying it.

22 Q. It's your position that one particular
23 need of the minority community in Georgia is that
24 there's a need for more equitable insurance. What is
25 that based on?

1 A. Yes. People are turned away every day for
2 not having insurance, until other resources become
3 available to them. If the price of those other
4 resources were just put into more equitable insurance
5 that would level that playing field.

6 Q. What kind of insurance are you referring
7 to?

8 A. Medical insurance. For the most part,
9 it's medical insurance.

10 MS. CLAPP: All right. Ms. Sykes, I'm
11 going to take a quick break, confer with Mr.
12 Jacoutot, and I will be right back.

13 THE WITNESS: Okay. I can mute and -- or
14 do I --

15 MS. CLAPP: Yes, ma'am. Please do. Thank
16 you.

17 (Recess was taken from 11:15 a.m. to 11:17
18 a.m.)

19 MS. CLAPP: Ms. Sykes, thank you so much
20 for your time today. I appreciate your thoughtful
21 responses to my questioning. I know it's probably
22 not the most fun to sit through a deposition. So I
23 appreciate you taking the time out of your retirement
24 schedule to sit with us today. And I'm done with my
25 questioning, unless your attorney has anything else.

1 MS. RUTAHINDURWA: I don't have any
2 questions. Thanks.

3 MS. CLAPP: Great. Thank you so much.

4 (The witness, after having been advised of
5 her right to read and sign the transcript, does not
6 waive that right.)

7 (Deposition was concluded at 11:18 a.m.)

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1 CERTIFICATE OF REPORTER

2 I, MARY K. STEPP, Notary Public for the State of
3 South Carolina at Large, do hereby certify that the
4 foregoing transcript is a true, accurate, and
5 complete record.

6 I further certify that I am neither related to
7 nor counsel for any party to the cause pending or
8 interested in the events thereof.

9 Witness my hand, I have hereunto affixed my
10 official seal this 30th day of December, 2022, at
11 Campobello, Spartanburg County, South Carolina.
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17



20 Mary K. Stepp, Notary Public
21 My Commission Expires:
22 March 1, 2028
23
24
25

I N D E X

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REQUESTED INFORMATION

(No information requested.)

E X H I B I T S

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1 Makeba Rutahindurwa

2 mrutahindurwa@elias.law

3 December 30th, 2022

4 RE: Pendergrass, Coakley, Et Al. v. Raffensperger, Brad, Et Al.

5 12/14/2022, Eunice Sykes (#5624086)

6 The above-referenced transcript is available for
7 review.

8 Within the applicable timeframe, the witness should
9 read the testimony to verify its accuracy. If there are
10 any changes, the witness should note those with the
11 reason, on the attached Errata Sheet.

12 The witness should sign the Acknowledgment of
13 Deponent and Errata and return to the deposing attorney.
14 Copies should be sent to all counsel, and to Veritext at
15 (cs-southeast@veritext.com).

16
17 Return completed errata within 30 days from
18 receipt of testimony.

19 If the witness fails to do so within the time
20 allotted, the transcript may be used as if signed.

21
22 Yours,

23 Veritext Legal Solutions
24
25

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Eunice Sykes (#5624086)

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Eunice Sykes

Date

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1 Pendergrass, Coakley, Et Al. v. Raffensperger, Brad, Et Al.
2 Eunice Sykes (#5624086)

ACKNOWLEDGEMENT OF DEPONENT

4 I, Eunice Sykes, do hereby declare that I
5 have read the foregoing transcript, I have made any
6 corrections, additions, or changes I deemed necessary as
7 noted above to be appended hereto, and that the same is
8 a true, correct and complete transcript of the testimony
9 given by me.

11 _____
12 Eunice Sykes

_____ Date

13 *If notary is required

14 SUBSCRIBED AND SWORN TO BEFORE ME THIS
15 _____ DAY OF _____, 20____.

16 _____
17
18
19 NOTARY PUBLIC
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[00122 - agree]

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Georgia Code

Title 9, Chapter 11

Article 5, Section 9-11-30

(e) Review by witness; changes; signing.

If requested by the deponent or a party before completion of the deposition, the deponent shall have 30 days after being notified by the officer that the transcript or recording is available in which to review the transcript or recording and, if there are changes in form or substance, to sign a statement reciting such changes and the reasons given by the deponent for making them. The officer shall indicate in the certificate prescribed by paragraph (1) of subsection (f) of this Code section whether any review was requested and, if so, shall append any changes made by the deponent during the period allowed. If the deposition is not reviewed and signed by the witness within 30 days of its submission to him or her, the officer shall sign it and state on the record that the deposition was not reviewed and signed by the deponent within 30 days. The deposition may then be used as fully as though signed unless, on a motion to suppress under paragraph (4) of subsection (d) of Code

Section 9-11-32, the court holds that the reasons given for the refusal to sign require rejection of the deposition in whole or in part.

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