

# EXHIBIT U

Grant, Annie Lois, et al.v. Raffensperger, Brad, E

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1 UNITED STATES DISTRICT COURT  
2 FOR THE NORTHERN DISTRICT OF GEORGIA  
3 ATLANTA DIVISION

4 ANNIE LOIS GRANT, et al.,

5 Plaintiffs,

6 v.

CIVIL ACTION FILE  
NO. 1:22-CV-00122-SCJ

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

11 Defendants.

12 COAKLEY PENDERGRASS, et al.,

13 Plaintiffs,

14 v.

CIVIL ACTION FILE  
NO. 1:21-CV-05339-SCJ

15 BRAD RAFFENSPERGER, et al.,  
16 Defendants.

17 VIDEOTAPED ZOOM DEPOSITION OF  
18 MAXWELL PALMER, Ph.D.

19 February 22, 2023

20 9:28 A.M.

21 Lee Ann Barnes, CCR-1852B, RPR, CRR, CRC  
22  
23  
24  
25

1 question, for the record.

2 BY MR. JACOUTOT:

3 Q. So let me ask you this: What is your  
4 standard for determining racial polarization?

5 A. So determining racial polarization, to me,  
6 comes in three parts.

7 First, I have to see if -- and just to  
8 simplify, just for black and white voters as I'm  
9 looking for here. If black voters vote  
10 cohesively -- that is, do they -- do the large  
11 majority of the black voters support the same  
12 candidate -- then do white voters vote cohesively,  
13 do a large majority of white voters support the same  
14 candidate, and then are they different candidates or  
15 not. So you first have to have a candidate of  
16 choice for each group and then those have to be  
17 different candidates.

18 Q. Okay. And how do you -- how do you define  
19 cohesively as used in that standard?

20 A. I don't have a bright-line test. Here the  
21 results are unambiguous regardless of any cutoff you  
22 might want to use.

23 Q. And you didn't examine any primary data in  
24 your analysis; right? It was strictly limited to  
25 general elections and runoffs, I believe.

1 A. That's correct.

2 Q. Okay. Do you know if there's a -- and  
3 this is just for how you operate personally in this  
4 area.

5 But do you know if there is a cutoff, like  
6 or a threshold level of support that you need to  
7 achieve in order to find -- in order for you to find  
8 that a -- a group voted cohesively in a given  
9 election?

10 A. I don't have a bright-line cutoff.

11 Q. If a group voted 55 percent for the same  
12 candidate, would you -- would you find that to be  
13 cohesive voting of that group?

14 A. Generally weakly cohesive or not cohesive.

15 Q. Okay. And if there's weak cohesion --

16 A. Sorry. I -- I would say that's not  
17 cohesive.

18 Q. Okay. What about 60 percent?

19 Have you ever seen a -- examined an  
20 election contest where an indiv- -- a group that you  
21 were analyzing voted 60 percent for a candidate -- a  
22 given candidate, would you -- have you ever said  
23 that that was sufficiently cohesive, in your  
24 opinion, for your -- for purposes of your racial  
25 polarization analysis?