

EXHIBIT G

UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA

GEORGIA STATE CONFERENCE OF) No.
NAACP, et al.,) 1:21-CV-5338-ELB-SCJ-
) SDG
Plaintiff,)
)
vs.)
)
STATE OF GEORGIA, et al.,)
)
Defendant.)
_____)

VIDEOTAPED 30(b)(6) and 30(b)(1) DEPOSITION OF
SENATE REDISTRICTING & REAPPORTIONMENT COMMITTEE

(MR. JOHN F. KENNEDY)

January 20, 2023

9:03 a.m.

18 Capitol Square SW
Atlanta, Georgia

Reported by: Marcella Daughtry, RPR, RMR
CA CSR 14315
GA No. 6595-1471-3597-5424

1 data that she had, but I -- I can't tell you the software
2 she was using or, you know, that level of detail of what
3 she -- what she sourced her information from.

4 Q Okay. Was it -- did you tell Gina Wright that
5 it was important that she try to protect incumbents in
6 the first draft of the congressional map?

7 A We certainly may have. I'm just trying to
8 recall. I don't recall the specifics of any conversation
9 about -- about that issue. I don't think anybody got
10 drawn out of their district, so to speak, though, so
11 that's why I'm telling you that, yeah.

12 Q Did you tell Gina Wright that she should
13 consider demographic data when drafting the first
14 congressional map?

15 A What do you mean "demographic data"?

16 Q Let's start with racial demographic data.

17 A Again, your -- your question presupposes. It
18 kind of puts the cart before the horse in the sense of as
19 though I walked in and said, here's what I want you to do
20 and here is the consideration. She was the expert. She
21 knew that. She -- she was steeped in the requirements of
22 what one would have to do to do this correctly, legally,
23 and be compliant going forward.

24 And I would say it was something that was just
25 inherent in her process as she went forward. She knew

1 Q Were the Senate Committee guidelines approved
2 on August 30, 2021?

3 A I don't remember the date, but that sounds
4 about right.

5 Q What role did you have in creating the
6 redistricting guidelines?

7 A If I remember correctly, these are the same
8 principles that were utilized in the last redistricting
9 cycle. So I would have lifted them, if you will, from
10 that and utilized them and placed them with our materials
11 for presentation to the committee for consideration of
12 what the plans, or the principles for drafting plans
13 should be for our current cycle.

14 Q What is your understanding of -- sorry, could
15 you read the principle number 3, please?

16 A "All plans adopted by the Committee will comply
17 with Section 2 of the Voting Rights Act of 1965, as
18 amended."

19 Q And what is your understanding of this
20 principle?

21 A I would have relied upon counsel to advise us
22 as to what, one, we should do to make sure we're in
23 compliance.

24 Q How did you ensure the Senate Committee
25 complied with this principle?

1 passed -- excuse me. I don't have the map that was
2 passed committed to memory, so I can't answer that.

3 Q When did you first see -- let's just assume
4 that this is S.B. 2EX, which was enacted.

5 A Okay.

6 Q When did you first see this proposed map?

7 A I don't remember.

8 Q To your knowledge, who drew this map?

9 A I believe it would be Gina Wright.

10 Q Do you know whether this map took into account
11 submission -- into account public feedback?

12 A I couldn't --

13 Q Do you know whether this map took into account
14 public feedback?

15 A The mapping process included a lot of feedback
16 from the public, including the town hall meetings, the
17 receipt of information, the committee hearings which were
18 public in which the public was invited to. All of that
19 process fed into what was ultimately this map, so I would
20 answer your question that way.

21 Q Did you have any role in drawing any part of
22 this map?

23 A And by way of reminder, this is the one that we
24 passed?

25 Q Correct.

1 (Deposition Exhibit 13 was marked for
2 identification.)

3 THE WITNESS: So tab 11, Exhibit 13?

4 Q BY MR. GENBERG: Yes.

5 A Okay.

6 Q What does this appear to be after you read it?

7 A It appears to be a press release sent out on
8 behalf of or, presumably, at the request of myself as
9 chair of the Senate Redistricting Committee and
10 Representative Bonnie Rich, chair of the House
11 Redistricting Committee, identifying the dates and
12 locations of town hall meetings and that we would have
13 such meetings for the public for the purpose of receiving
14 public input on the redistricting process.

15 And my exhibit behind tab 11 is two pages, but
16 the second page is -- is blank except for just some small
17 print text at the top, so I don't know if I'm supposed to
18 have more on that page or not.

19 Q Do you see that the date, Monday, August 30,
20 2021, is crossed out for the Augusta hearing, and then in
21 parentheses it says, "Rescheduled to an earlier date -
22 August 11th"?

23 A Yes.

24 Q Do you have an understanding why that town hall
25 was changed from August 30th to August 11th?

1 A No, except I do remember one of the -- the
2 hearing dates and the town hall meetings were impacted, I
3 believe by a storm that came through and necessitated the
4 cancellation of one of our town hall meetings, and that
5 may have had -- have impacted, caused in whole or in part
6 this reshuffling that you are seeing on that. I just
7 don't remember enough about the specific dates.

8 That's the only thing that comes to mind as to
9 why some things had to be rescheduled. It could have
10 been other reasons, though.

11 Q Okay. We can take a break.

12 A Okay.

13 THE VIDEOGRAPHER: The time is 4:28 p.m. We
14 are now off the record.

15 (The deposition was at recess from 4:28 p.m. to
16 4:49 p.m.)

17 THE VIDEOGRAPHER: The time is 4:49 p.m., and
18 we are back on the record.

19 Q BY MR. GENBERG: Senator Kennedy, do you have
20 anything else to say that bears on the topics noticed in
21 the Senate Committee subpoena that we have not discussed?

22 A Well, I think I came here to answer your
23 questions, is how I would answer that, and nothing comes
24 to mind. I'm happy to answer questions that you pose. I
25 think that's the only way I can answer that. I'm happy