

# EXHIBIT 41

Grant, Annie Lois, et al.v. Raffensperger, Brad, Et Al.

Page 1

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

4  
5       CIVIL ACTION NUMBER:   1:22-CV-00122-SCJ

6       ANNIE LOIS GRANT; et al.,

7                   Plaintiff(s),

8                   vs.

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

12                   Defendant(s).

13  
14  
15                   DEPOSITION TESTIMONY OF:

16                           GARRETT REYNOLDS

17                           January 25, 2023

18                           3 p.m. Eastern Time

19                   VIA REMOTE VIDEO-CONFERENCE  
20  
21  
22

23       COURT REPORTER:

24       Angela Smith McGalliard,

25       RPR, CRR, CCR

1 (Defendant's Exhibit  
2 2 was marked for  
3 identification.)

4 Q. And now I'm going to bring up  
5 what will be marked as Defendant's Exhibit  
6 2. And this is going to be what I believe  
7 is the Second Amended Complaint that has  
8 been filed by -- Let me scroll back up.  
9 And do you see this screen on the diagram  
10 where it says Second Amended Complaint, Mr.  
11 Reynolds?

12 A. Yes.

13 Q. And are you familiar with either  
14 this document or a version of this document  
15 as it relates to the litigation?

16 A. Yes.

17 Q. Have you read this document?

18 A. Not in detail.

19 Q. Okay. Are you familiar generally  
20 with the allegations in the Complaint?

21 A. I am.

22 Q. And I'm going to scroll down to  
23 paragraph nineteen of the Complaint, which  
24 I believe is on page nine -- page ten.

25 Do you see paragraph nineteen

1 that starts out: Plaintiff Garrett  
2 Reynolds?

3 A. I do.

4 Q. I'm just going to ask you to  
5 quickly read to yourself that paragraph and  
6 let me know when you've finished reading  
7 it.

8 A. Okay.

9 Q. Does it end at the word Georgia  
10 General Assembly?

11 A. Yes, it does.

12 Q. And, Mr. Reynolds, do you  
13 recognize the allegations contained in this  
14 paragraph?

15 A. I do.

16 Q. And was that information that you  
17 read true and accurate as it relates to  
18 you?

19 A. Yes.

20 Q. And we touched on this a little  
21 bit earlier, and it was in the paragraph  
22 that you just read, but you reside in State  
23 Senate District 16; is that correct?

24 A. Yes.

25 Q. And you mentioned that you voted