

EXHIBIT 36

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

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UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION

ANNIE LOIS GRANT, et al.,

Plaintiffs,

vs.

CIVIL ACTION FILE

NO. 1:22-CV-00122-SCJ

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

Defendants.

DEPOSITION OF ELROY TOLBERT

Taken by Remote Conference

February 9, 2023

9:04 a.m.

Valerie N. Almand, RPR, CRR, CRC

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

3 A. No, I don't.

4 Q. All right. Mr. Tolbert, can you state
5 your current address for the record.

6 A. [REDACTED]

7 Macon, Georgia [REDACTED]

8 Q. How long have you lived in Macon?

9 A. Since 1988.

10 Q. Have you always lived at that same
11 address?

12 A. No I haven't.

13 Q. And for the record, what county do you
14 live in?

15 A. Bibb, Macon-Bibb.

16 Q. You said that was [REDACTED]?

17 A. [REDACTED].

18 Q. Can you spell that?

19 A. [REDACTED]

20 Q. I want to make sure I'm referring to the
21 correct address when I ask about it. Where did
22 you live before the [REDACTED]?

23 A. [REDACTED]. That's also Macon.

24 Q. Is that the same county?

25 A. Yes.

1 Q. Okay. And when did you move from
2 [REDACTED] to your current address?

3 A. 2017.

4 Q. When did you move to the [REDACTED]
5 address?

6 A. 1999.

7 Q. All right. And how long have you lived
8 in Macon-Bibb County?

9 A. Since '88.

10 Q. What about the state of Georgia?

11 A. All my life.

12 Q. What other counties have you resided in
13 in Georgia?

14 A. Baldwin County.

15 Q. What time period was that?

16 A. That's where I was born.

17 Q. Okay. Makes it pretty easy. Some
18 plaintiffs have moved all around, so their
19 residential history was quite lengthy.

20 A. Right.

21 Q. And just to be clear for the record, have
22 you ever resided in any other state?

23 A. No, I haven't.

24 Q. And where are you testifying from today?

25 A. Macon.