

# EXHIBIT 35

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

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

ANNIE LOIS GRANT, et al., )  
)  
Plaintiffs, )  
)  
v. ) CIVIL ACTION FILE NO.  
) 1:22-CV-00122-SCJ  
BRAD RAFFENSPERGER, in his )  
official capacity as the )  
Georgia Secretary of State, )  
et al., )  
)  
Defendants. )

\* \* \*

Remote Videoconference Deposition of  
QUENTIN T. HOWELL

December 14, 2022

1:03 p.m.

By Marcia Arberman, CCR B-1059

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1           A     I don't remember looking at one. I mean,  
2     most of this stuff happened about a year ago. So I  
3     know I didn't read nothing like this about it. It's  
4     more than one complaint?

5           Q     Well, yeah. I'll tell you, the lawsuit was  
6     filed in January. And the complaint was amended  
7     twice, the most recent one being this. I'm scrolling  
8     to the top. It's got a stamp that says October 28th.  
9     Do you see that? 10/28/22.

10          A     Okay.

11          Q     But you don't recall seeing it. Do you even  
12     recall somebody telling you it's been filed?

13          A     I don't remember. I didn't read it, if  
14     that's what you're asking me.

15          Q     I'll scroll down. There's a paragraph that  
16     specifically talks about you. I'll put that up on the  
17     screen. Paragraph 12. And this goes over just a  
18     couple lines to the next page, but I want you to read  
19     this.

20          A     Out loud?

21          Q     No, no. Just to yourself, just to yourself.  
22     Tell me when you've gotten to the end, and I'll scroll  
23     down to the next page.

24          A     Go ahead.

25          Q     (Scrolling.)

1 A Okay.

2 Q All right. I just want to confirm with you,  
3 going back up to where paragraph 12 starts, it says in  
4 the second line you're a registered voter. We've  
5 established that already, right? You are a registered  
6 voter, correct?

7 A Am I a registered voter?

8 Q Yes, sir.

9 A Yes, sir.

10 Q And it says you intend to vote in future  
11 legislative elections; is that correct?

12 A Yes, sir, the Good Lord willing.

13 Q You're a resident of Baldwin County, right?

14 A Yes, sir.

15 Q And you're in Senate District 25 and House  
16 District 133 under the enacted plans, that is, those  
17 enacted in 2021, right?

18 A Yes, sir.

19 Q It goes on to say you were unable to elect  
20 candidates of your choice to the Georgia State Senate  
21 and Georgia House despite strong electoral support for  
22 those candidates from other black voters in your  
23 community. Is that true?

24 A Yeah. I would agree with that, brother.

25 Q Why are you unable to elect candidates of

1 your choice in this new district?

2 A Well, the district lines has broken up, and  
3 it dilutes the power of the African-American  
4 community. Then our community voice can't be heard.

5 THE WITNESS: I see his lips moving, but  
6 I don't hear nothing.

7 BY MR. HOWELL:

8 Q Are you talking -- I didn't have a question.

9 A Oh, I thought your lips was moving. I  
10 thought you were saying something. I was just saying  
11 I couldn't hear you.

12 Q I think you -- you told me earlier you voted  
13 in the general election in November, right?  
14 November 2020.

15 A You mean the midterm election.

16 Q Well, when I say general, I mean as opposed  
17 to the primaries earlier in the year.

18 A I didn't miss one.

19 Q Do you remember who you voted for for the  
20 Georgia State Senate in the November 2022 election?

21 A In November?

22 Q Yes, sir.

23 A For State Senate it was Valerie Rogers.

24 Q Did she win?

25 A No, sir, she did not.