

EXHIBIT 39

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

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

ANNIE LOIS GRANT, et al.,
Plaintiffs,

CIVIL ACTION FILE

vs.

NO. 1:22-CV-00122-SCJ

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

Defendants.

DEPOSITION OF ELBERT SOLOMON
TAKEN BY REMOTE VIDEOCONFERENCE

December 9, 2022
2:10 p.m.

REPORTED REMOTELY BY:
LAURA R. SINGLE, CCR-B-1343

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1 MS. LAROSS: Thank you. I very much
2 appreciate your help with this.

3 MS. RUTAHINDURWA: No problem.

4 BY MS. LAROSS:

5 Q. Mr. Solomon, so paragraph 17 begins with
6 Plaintiff Elbert Solomon is a black citizen of the
7 United States and the State of Georgia. Do you see
8 where I'm referring -- what I'm referring to?

9 A. Yes.

10 Q. If you could just take a moment and read
11 through the entirety of paragraph 17. I think it
12 goes on to the next page. If you could tell me if
13 all of the information contained in that paragraph is
14 accurate.

15 MS. RUTAHINDURWA: And just let me know when
16 to scroll down, Mr. Solomon.

17 THE WITNESS: You can scroll down.

18 That's the end of it, of 17. I finished
19 reading it.

20 BY MS. LAROSS:

21 Q. Perfect. Thank you.

22 Is everything in that paragraph accurate
23 still today?

24 A. It is accurate.

25 Q. I do think you mentioned that you voted in