

EXHIBIT 34

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
ANNIE LOIS GRANT

December 14, 2022

4:27 p.m.

By Marcia Arberman, CCR B-1059

1 A Yes. I see the Plaintiffs. I'm trying to
2 scroll up. Wait a minute. Here we go.

3 Q Yeah. I think your attorney is going to
4 have to scroll for you.

5 A Uh-huh.

6 Q Okay, all right. And have you reviewed this
7 document before?

8 A I read this one. Yes.

9 Q Okay. And if I could direct you and your
10 counsel to paragraph 11. And that's on page 4. It
11 starts at the bottom of page 4 and then goes to the
12 top of page 5. And that paragraph begins with
13 "Plaintiff Annie Louis Grant is a black citizen of the
14 United States and the state of Georgia." Let me know
15 when you can see what I'm talking about.

16 A I do.

17 Q Okay. Thank you.

18 Can you review that paragraph 11 and --

19 A I have.

20 Q Okay, great. And is the information
21 contained in that paragraph about you -- is all of
22 that correct and accurate?

23 A It is. And if I can say so, it's exactly
24 what I was saying, just in different words. My words
25 were layman -- as a layman person.