

EXHIBIT 42

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
) NO. 1:22-CV-00122-SCJ
v.)
)
BRAD RAFFENSPERGER, in his)
official capacity as the)
Georgia Secretary of State,)
et al.,)

VOLUME I

The deposition of JACQUELINE ARBUTHNOT taken pursuant to the stipulations contained herein; all formalities waived, excluding the reading and signing of the deposition; before Heather D. Williams, CCR; taken on January 24th, 2023, via Zoom teleconference, commencing at 3:00 p.m.

1 A No.

2 Q And have you discussed this deposition with anyone
3 other than your lawyer?

4 A No.

5 Q Did you review anything to prepare for this
6 deposition?

7 A Yes.

8 Q And what did you review?

9 A The documents that you said I received from the
10 attorney, only.

11 Q Without divulging any attorney-client privilege
12 information, or the nature, or form of any communication you've
13 had with your attorney, why did you look at those documents?

14 A To refresh my memory.

15 Q So looking at those documents helped to refresh your
16 recollection as to the events that you will testify about today?

17 A Yes.

18 Q And do you have any documents or notes with you today?

19 A No.

20 Q Shifting gears again, Ms. Arbuthnot. Could you please
21 state your full name for the record?

22 A Jacqueline Faye Arbuthnot.

23 Q And Ms. Arbuthnot, what is your current address?

24 A [REDACTED] Powder Springs, Georgia

25 [REDACTED]

1 Q Okay. What county is that in?

2 A Paulding.

3 Q And the city you said is Powder Springs; correct?

4 A Correct.

5 Q And how long have you lived at that address?

6 A About 18 years, plus.

7 Q And have you lived anywhere else in the past two
8 years?

9 A No.

10 Q And you recall where you lived before moving to your
11 current address?

12 A In Mississippi. You said the address? Pardon me.

13 Q No. And how long did you live in Mississippi for?

14 A 30-plus years.

15 Q And is the address you provided earlier the only
16 address that you have lived in since moving from Mississippi to
17 Georgia?

18 A There's been others.

19 Q Okay. And do you recall what those were?

20 A I can't quite remember the numbers, but it was Bakers
21 Mill, here in Georgia -- Atlanta. Let's see. I lived in
22 Fairburn, and College Park, as a matter of fact, when I first
23 got here -- in Georgia.

24 Q And so how long have you lived in Paulding County?

25 A The 18 years at my home address.