

EXHIBIT 38

Pendergrass, Coakley, 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,

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.

(Appearance via Video Conference)

DEPOSITION OF: EUNICE SYKES

DATE: December 14, 2022

TIME: 10:00 a.m.

LOCATION: Home of Eunice Sykes
[REDACTED]

Locust Grove, Georgia

TAKEN BY: Counsel for the Defendants

REPORTED BY: Mary K. Stepp, Court Reporter

(Appearance via Video Conference)

1 for you signing on to this case?

2 A. Say that again.

3 Q. Is there any kind of contract for you
4 signing on to this case?

5 A. No.

6 Q. Are you being paid?

7 A. No.

8 Q. Have you received anything of value in
9 exchange for your participation as a plaintiff in
10 this case?

11 A. No.

12 Q. All right. Ms. Sykes, I'd like to share
13 my screen again.

14 (Off-record discussion.)

15 MS. CLAPP: Now I'm displaying for
16 Ms. Sykes the Second Amended Complaint, which I'd
17 like to mark as Exhibit 2.

18 (Defendant's Exhibit No. 2 was marked for
19 identification.)

20 BY MS. CLAPP:

21 Q. Ms. Sykes, have you seen this document
22 before? I'll scroll through it before you answer, if
23 you'll give me just a moment.

24 Your name is in paragraph 16. Have you
25 seen this document before?

1 A. Yes.

2 Q. Okay. When did you see it?

3 A. Uhm, probably within the last month or so.

4 Q. So is it safe to say you saw it in the
5 month of November?

6 A. Yes.

7 Q. And have you read this document in its
8 entirety?

9 A. No.

10 Q. So you don't know the specifics of the
11 allegations contained in this document?

12 A. I -- I know the general specifics, yes.

13 Q. Okay. Would you describe the general
14 allegations made in the complaint, as to your
15 understanding?

16 A. Uhm, this is about redistricting, drawing
17 lines across the state that make it difficult for
18 minorities to show up to vote. And it makes it
19 difficult for them to be a part of the voter process
20 by way of certain things that are happening. Like
21 standing in long lines and not being able to take
22 breaks, that sort of thing.

23 Q. Are you at a minimum familiar with this
24 paragraph in which you're mentioned, this paragraph
25 16?

1 A. Yes.

2 Q. And would you agree with its
3 representations of your position in this matter?

4 A. Yes.

5 Q. Now, did you reach out to any legislators
6 during the 2021 special session concerning the
7 redistricting issues raised in your complaint?

8 A. No.

9 Q. How about before the special session?

10 A. I am a member of an organization that
11 stays in touch with our legislators on the various
12 issues in the State of Georgia.

13 Q. What organization would that be?

14 A. It's a sorority.

15 Q. Okay. What sorority is that?

16 A. Alpha Kappa Alpha sorority.

17 Q. Do you hold any leadership positions with
18 them?

19 A. No.

20 Q. And what year did you become a member?

21 A. I've been a member all my life. For
22 years.

23 Q. Is that something you joined in undergrad?

24 A. No. Grad.

25 Q. Oh, you were a grad. Sorry.