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

GEORGIA STATE CONFERENCE)
OF THE NAACP, et al.)
) CASE NO.
Plaintiffs,) 1:21-CV-5338
) ELB-SCJ-SDG
vs.)
)
STATE OF GEORGIA, et al.,)
)
Defendants.)
_____)
COMMON CAUSE, et al.,)
) CASE NO.
Plaintiffs,) 1:22-CV-00090
) ELB-SCJ-SDG
vs.)
)
BRAD RAFFENSPERGER)
)
Defendant.)

30(b)(6) remote deposition of GEORGIA ASSOCIATION OF LATINO ELECTED OFFICIALS, INC., Deponent DAVID GARCIA, pursuant to notice and agreement of counsel, under the Federal Rules of Civil Procedure, before Celeste Mack, CCR, RPR, at Crowell & Moring, 1001 Pennsylvania Avenue NW, Washington, D.C., on Wednesday, January 11, 2023, commencing at 12:35 p.m.

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ALSO PRESENT: Elena
Gerardo Eleazar Gonzalez

1 I N D E X

2 CASE CAPTION . . . . . Page 1
APPEARANCES. . . . . Page 2
3 INDEX. . . . . Page 3
TESTIMONY. . . . . Page 6
4 REPORTER CERTIFICATE . . . . . Page 28
5
EXAMINATION
6
By Ms. LaRoss. . . . . Page 6
7 By Mr. Layman. . . . . Page 24
By Ms. LaRoss. . . . . Page 25
8
9
10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

D I S C L O S U R E S T A T E M E N T

STATE OF GEORGIA

COUNTY OF CHATHAM

Pursuant to Article 10.B of the Rules and Regulations of the Board of Court Reporting of the Judicial Council of Georgia, I make the following disclosure:

I am a Georgia Certified Court Reporter.

I am not disqualified for a relationship of interest under the provisions of O.C.G.A 9-11-28(c).

I am self-employed. I was contacted by Veritext Legal Solutions to provide court reporting services for this proceeding.

I will not be taking this proceeding under any contract that is prohibited by Georgia law.

This, the 22nd day of January 2023.

_____

Celeste Mack, CCR, RPR 2738

(Whereupon, the following proceedings were had, to wit:)

DAVID GARCIA,

having been produced and first duly sworn as a witness, testified as follows:

MS. LaROSS: There's a few comments that I need to make to begin the deposition.

So this will be the 30(b)(6) deposition of the GALEO Latino Community Development Fund, and particularly the topic number 12, taken by defendants in this case for purposes of discovery and all other purposes allowable under the Federal Rules of Civil Procedure.

So all reservations, objections, stipulations, as in Mr. Gonzalez's depositions, will have those apply here as well, if that's okay with counsel.

MR. LAYMAN: Yes, that's okay.

MS. LaROSS: And do you want to have -- for this witness as well, to read and sign the deposition.

MR. LAYMAN: Yeah, we'd like to do that.

MS. LaROSS: Okay, all right.

1 EXAMINATION
2 BY MS. LaROSS:
3 Q. So Mr. Garcia, you patiently attended
4 Mr. Gonzalez's deposition. And when that began
5 there were certain instructions that we went over
6 to make sure that we -- you know, only one person
7 speaks at a time.
8 That -- you know, that you speak loudly
9 and clearly.
10 And that -- and as well, if there's
11 anything that I ask you that's confusing or you
12 don't understand, that you'll let me know that
13 and I'll clarify my questions.
14 So are all of those instructions
15 agreeable to you as well?
16 A. Yes.
17 Q. Okay, great.
18 And also, as we requested of
19 Mr. Gonzalez, we would ask that you turn off any
20 cell phones or your e-mail or any social media
21 during the deposition. Obviously, you have to
22 keep Zoom on and the Exhibit Share, but other
23 than that, if you could turn everything else off;
24 is that agreeable to you, Mr. Garcia?
25 A. Yes, I don't -- my phone is silenced, I

don't have it off. Do you want me to physically turn it off?

Q. Are you expecting like a --

A. No, no, I just had it silenced, okay.

Q. Yeah, if you could turn it off, I'd appreciate that. You know, if there's somebody in the hospital or something you need to know, obviously, you know, that's -- but okay, thank you, sir.

Okay, so we're all set to go, Mr. Garcia?

A. Ah-ha.

Q. Okay, great. And you will need to respond verbally to the questions so that the court reporter can take down an accurate transcript; is that also acceptable to you?

A. Yes.

Q. And you're giving your deposition from the GALEO FUND office, the same place that Mr. Gonzalez testified from; is that right?

A. Yes.

Q. And in the room there with you is your counsel Shawn and LaTonya, and as well Mr. Gonzalez, correct?

A. Yes.

Q. Is there anyone else in the room with you, other than the people I've named?
A. No.
Q. Mr. Garcia, if you could go ahead and state your full name for the record.
A. David Garcia.
Q. And Mr. Garcia, have you taken any medications today that may prevent you from fully and truthfully participating in the deposition?
A. No, I have not.
Q. And do you have any medical conditions that might prevent you from truthfully and fully participating in the deposition?
A. No.
Q. Have you ever testified by deposition before?
A. No, I have not.
Q. Have you ever testified in court?
A. No, I have not.
Q. Have you ever been convicted of a crime?
MR. LAYMAN: Objection, it's unrelated to the 30(b)(6) topic and not relevant to this matter.
MS. LaROSS: It goes to the witness and credibility of the witness, so I would just

object to your statements there. So are you instructing him not to answer?

MR. LAYMAN: Can you rephrase the question?

BY MS. LaROSS:

Q. Okay. Well, Mr. Garcia, have you ever been convicted of a crime of moral turpitude?

A. No, I have not.

Q. Mr. Garcia, just really briefly, if you could let us know about your education and how far you got in school.

A. My highest level of education is a Master's degree in Public Administration.

Q. Okay. And where did you receive the Master's degree in Public Administration?

A. Georgia State University.

Q. And where did you do your undergraduate work?

A. American Military University.

Q. And what degrees did you receive from the American Military University?

A. A Bachelor's in Political Science.

Q. Do you hold any other academic degrees, other than what you've mentioned?

A. An Associate's degree in General

Studies.
Q. Was that also at the American Military University?
A. No, that was at Central Texas College.
Q. Are you currently serving in the military?
A. No.
Q. Have you ever --
A. I did.
Q. -- served in the military?
A. Yes.
Q. And what -- what rank did you achieve -- the highest rank you achieved while serving in the military?
A. E5.
Q. And which branch of military was that?
A. The Marine Corps.
Q. And were you honorably discharged from the Marine Corps?
A. Yes, I was.
Q. Okay, any other academic degrees, other than you said master's degree, you also have a Bachelor's of Political Science, and an associate's degree, anything else?
A. No.

Q. And I just want to go over quickly your employment. Let me start, though, if I may, with your work with the FUND. When did you begin working for the GALEO FUND?

A. I believe it was November -- October -- either late October or early November 2021, I can't remember the exact date.

Q. And prior to that time, had you worked at all for the FUND?

A. No. Not as an employee, no. I was a volunteer and I went through a leadership development program with GALEO, I believe, in 2015 or '16.

Q. So then did you complete that leadership program with GALEO?

A. Yes, I did.

Q. So that would mean that you're an alumni of the leadership program?

A. I am.

Q. Did you hold any other -- or any positions with the GALEO Association?

A. No.

Q. And what positions do you hold with the FUND, or have you held since October 2021?

A. The director of policy and advocacy.

Q. And tell us a little bit about the work that you do; how would you describe your work?

A. My job is to formulate our policy positions and to communicate them to elected officials and community leaders to inform their policy deliberations.

Q. And as your position, are you director for the FUND?

A. Yes, my title is director of policy and advocacy.

Q. Do you hold any other positions of employment outside of the work with the FUND?

A. No.

Q. And before that, after completing your college and up until the time that you joined the FUND, just tell us generally what kind of work you did.

A. I've worked in the nonprofit sector for about five or six years, since completing my graduate degree in 2016.

Q. Have you worked with any of the other plaintiffs in this case?

A. No, I have not.

Q. And Mr. Garcia, I understand that you have been designated by the GALEO Latino

Community Development Fund to testify as their representative as to one particular topic; is that correct?

A. That's correct.

Q. Okay. Let's go ahead, if you would, look at the exhibits, and if you could open up Exhibit No. 1. That's the amended notice for today's deposition.

A. Okay.

Q. Am I correct to understand -- oh, I'm sorry, sorry. And take a look at the notice and let me know when you're set.

A. I'm set.

Q. All right. And then am I correct to understand you've been designated to testify as to topic number 11 in the amended notice of deposition?

A. Yes.

Q. So let's turn to the notice itself, the first page -- I'm sorry, on the second page. In the second full paragraph, it states that the person -- the second full sentence, "The person must be ready to testify about the information known or reasonably available to the organization regarding," and we'll say topic 11 particularly

for you. Do you see that sentence that I'm referring to?

A. I'm sorry, which -- is it the first paragraph?

Q. No, the second full paragraph on page two.

A. Ah-ha. Yes, I do see that.

Q. Okay, yeah. So if you look at that, and then if you look at the second sentence in that paragraph; do you see that?

A. Yes, I do.

Q. Okay, where it says, "The person must be ready to testify about the information known and reasonably available to the organization regarding the topics listed in Exhibit A attached hereto," and do you see that sentence there?

A. Yes, I do.

Q. And do you understand that the FUND has designated you as a person to testify as to one topic that's listed in the notice?

A. Yes, I do.

Q. And that your testimony here today is on behalf of the FUND and based upon information known and reasonably available to the FUND; is that your understanding of your testimony today?

A. That's right.
Q. And what did you do to prepare for your testimony today, and certainly other than speaking with your attorneys?
A. I read the complaint and the transcripts.
Q. And you say "the transcripts", the transcripts of what?
A. My testimony at the redistricting hearing, the special session on redistricting.
Q. Oh, okay. So no transcripts of depositions in this case, just from testimony that you gave; is that right?
A. That's right.
Q. Did you do anything else to prepare for your testimony today?
A. No.
Q. And that would include, did you speak with anyone, other than your attorneys, concerning your testimony today?
A. No.
Q. Or did you speak with anyone in order to prepare for your testimony today?
A. No.
MR. LAYMAN: Sorry, other than

Jerry Gonzalez.

THE WITNESS: Right, that's correct.

BY MS. LaROSS:

Q. And your discussions with Jerry Gonzalez, what did they involve?

A. We -- we went through the complaint and the transcripts from my testimony that I just mentioned earlier, my testimony at the special redistricting session.

Q. Was there anything else that you two discussed?

A. No.

Q. Let's look at topic number 11, which is on page five of the notice.

A. Okay.

Q. Okay, it's the organization's communications with the General Assembly regarding the laws, policies and protocols it challenges in this action from January 1, 2021, to the present. Do you see that topic?

A. Yes.

Q. And is this the topic that you are prepared to testify on behalf of the FUND today?

A. Yes.

Q. And tell us about the FUND's communications with the General Assembly.
A. I -- I testified in person during the special session on redistricting, and I also submitted a public comment through the online portal that was available.
Q. And when you testified, was that -- do you know what date that was?
A. I don't remember the exact date, but I do believe it was in early November.
Q. Is that early November of 2021?
A. Yes.
Q. Was that to a particular committee, or was that to the General Assembly as a whole?
A. From my understanding it was to the committee, and that should be in the transcript for my testimony.
Q. What was the substance of your testimony, in general?
A. I'm sorry, can you repeat the question?
Q. Sure. What was the substance of your testimony, generally?
A. I communicated GALEO's position on the matter.
Q. Okay, so when you say that you

communicated, did you mean the GALEO FUND's position on redistricting?

A. That's right.

Q. Okay. And tell us more specifically about what you testified to.

A. The special session on redistricting as it related to the -- I don't remember the exact name of -- of the session, but it was a special session on redistricting.

Q. And at that point when you testified, had the redistricting maps been adopted or -- by the General Assembly, or they hadn't yet been adopted?

A. I can't recall, but I do believe that should be in the transcript of -- of the -- of my testimony. The date --

Q. The date?

A. Right.

Q. Okay. Yeah, I just didn't know if, off the top of your head, you remembered at what -- what the time frame was of your testimony.

A. I don't remember.

Q. And in your testimony, I think you mentioned you were speaking on behalf of the FUND; is that correct?

A. That's correct.
Q. And in your testimony, did you speak publicly concerning the unity maps?
A. I -- I believe so. And again, that should be in the transcript of my testimony.
Q. In your testimony, did you mention the FUND's opposition to the maps as introduced by the General Assembly?
A. Yes, I believe so.
Q. Did you -- in addition to your testimony, did you speak with any legislators, aside from your testimony?
A. No.
Q. Do you know if any legislator introduced the unity maps as a bill in the General Assembly?
A. I can't recall, but I think that also should be in the transcript.
Q. It would be something that you spoke about, is that your understanding?
A. Right, I can't recall the exact wording of my testimony, but I think -- I think I may have. And in reviewing the transcripts, I think I do remember reading that I did, but it should be in the transcript.
Q. As you sit here today, do you recall

anything specific about what you testified on that point?

A. I'm sorry, can you repeat the question?

Q. Sure. As you sit here today, do you recall anything specific that you testified to on that point?

A. I do.

Q. And what was that?

A. Which -- which one exactly? I testified several times. Are you referring to a specific --

Q. Okay, I misunderstood that. So you testified more than once to the General Assembly?

A. That's right.

Q. Okay. All right. And so then -- so -- and how many times did you testify?

A. I -- I can't recall the exact number of times, it must have been maybe two or three times, I believe, including --

Q. And including what?

A. The public comment.

Q. Okay. And that public comment you submitted to the portal?

A. That's right.

Q. And when you testified those two or

1 three times to the General Assembly, was that on
2 behalf of the FUND?
3 A. That's correct.
4 Q. And were you ever prevented from
5 testifying in -- at the General Assembly --
6 A. No.
7 Q. -- concerning redistricting?
8 Did you speak with any Democratic
9 legislators who publicly supported the unity
10 maps?
11 A. No.
12 Q. Did the FUND ever announce its support
13 for the unity -- sorry, let me start again.
14 Did the FUND ever announce support for
15 the maps introduced by the Democratic caucus in
16 the General Assembly?
17 A. I can't recall, but that -- that may be
18 in the transcript. I can't remember
19 word-for-word what my testimony included without
20 having the transcript in front of me.
21 Q. So just generally -- yeah, I'm asking
22 for your general memory of that testimony as best
23 you can as you sit here today.
24 A. Yes, we did. I did.
25 MR. LAYMAN: Can you repeat the

1 question again?
2 BY MS. LaROSS:
3 Q. Okay, I think we might have got a little
4 confused there, Mr. Garcia. So I'm just -- I'm
5 gonna ask my question again, and I think I know
6 your answer, but I just want to make sure we're
7 clear for the record.
8 So did the FUND ever announce support
9 for the maps introduced by the Democratic caucus?
10 A. From what I can recall, part of my
11 testimony was introducing the unity maps that
12 were the alternative maps. And again, from my
13 understanding, I can't recall if the unity maps
14 were the maps that the Democratic caucus was
15 supporting.
16 Q. Okay. Okay, thank you for clarifying
17 that for us.
18 And the comment that you sent in through
19 the portal, were those also on behalf of the
20 FUND?
21 A. That's correct.
22 Q. And are those -- is there a specific --
23 does the FUND have a written copy of those
24 comments that were submitted to the portal?
25 A. Yes.

Q. And is that something that was produced to your attorneys?
A. Yes.
Q. Do you know if -- okay.
MR. LAYMAN: So I can just -- those were -- they're public comments that can be accessed on the public portal, and so they --
(Pause in proceedings.)
BY MS. LaROSS:
Q. So other than your testimony two or three times to the General Assembly, Mr. Garcia, and the public comments that we just spoke about that were submitted through the portal, were there any other communications between the FUND and anyone in the General Assembly --
A. No.
Q. -- from January 1, 2021, to the present?
A. No.
MS. LaROSS: Can we just take a moment and I'll see if there's any further questions we have. We may be through. Just a moment.
(Pause in proceedings.)
MS. LaROSS: So I have no further questions at this time, and I also thank

Mr. Garcia for his time and his patience. I know it's been a bit of a long day to wait for the questioning. So thank you, sir.

MR. LAYMAN: I'd like to follow-up on one point --

MS. LaROSS: Oh, sorry.

MR. LAYMAN: -- for David.

EXAMINATION

BY MR. LAYMAN:

Q. So there was a question -- Ms. LaRoss asked you a question about communications -- other communications that were made to the General Assembly about redistricting. Is your understanding that no communications were made by the FUND, or was it just communications from -- that you made?

A. Communications that I made.

Q. Okay. So you're answering on -- as far as communications that you made, not communications that the FUND made as a whole?

A. Right, communications that I was aware of.

Q. And -- okay.

MR. LAYMAN: I just wanted to clarify that. I think he misunderstood your

1 question specifically about whether it was the
2 FUND making -- the FUND had made any
3 communications or just -- or just him. Jerry I
4 think spoke to that, other communications.
5 MS. LaROSS: Okay.
6 RE-EXAMINATION
7 BY MS. LaROSS:
8 Q. Okay, so let me just make sure that I'm
9 clear about where we are at this point.
10 So Mr. Garcia, I understand that you
11 testified as to your communications with the
12 General Assembly; is that right?
13 A. That's correct.
14 Q. Okay. And so were there communications
15 by the FUND to the General Assembly that were not
16 made by you from January 1, 2021, until the
17 present?
18 A. I don't know. I don't completely
19 entirely understand the question. I'm sure there
20 were other -- or I don't know -- I'm sorry, I
21 don't think I entirely understand your question.
22 Q. Yeah. I'm asking about -- you
23 understand that your obligation today is to
24 testify on behalf of the FUND; is that correct?
25 A. Yes.

Q. And so it would be -- we are asking you to testify on behalf of the FUND as to knowledge of the FUND and what information available to the FUND, so that may go beyond what you were personally involved with.

A. Right.

Q. Do you understand that is your obligation?

A. Yes.

MR. LAYMAN: So just to clarify, so Jerry was the individual that we put as a whole for topic 12 [sic]. And the reason why we have David here also testifying on topic 12 [sic] is specifically about his communications. It's not limited to what Jerry said.

So there may be some communication that he spoke to Jerry about that David may not be aware of.

MS. LaROSS: Okay. And you mean topic 11, Shawn, correct?

MR. LAYMAN: Yeah, topic 11.

MS. LaROSS: Just to make sure the record is clear. Okay, hang on just for a minute.

Those are all the questions we have at

this time, Mr. Garcia. Again, thank you for your time, sir.

(The deposition concluded at 1:05 p.m.)

C E R T I F I C A T E

G E O R G I A :

CHATHAM COUNTY :

I hereby certify that the foregoing transcript was taken down, as stated in the caption, and the questions and answers thereto were reduced to typewriting under my direction; that the foregoing Pages 1 through 27 represent a true and correct transcript of the evidence given upon said hearing, and I further certify that I am not of kin or counsel to the parties in the case; am not in the regular employ of counsel for any of said parties; nor am I in anywise interested in the result of said case.

Th: Celeste Mack)23.

_____

Celeste Mack, CCR, RPR, 2738

To: DAVID GARCIA
Re: Signature of DAVID GARCIA
Date Errata due back at our offices: 30 days

Greetings:
The deponent has reserved the right to read and sign. Please have the deponent review the deposition transcript, noting any changes or corrections on the attached Errata.
Once the Errata is signed by the deponent and notarized, please mail it to the address below. When the signed Errata is returned to us, we will seal and forward to the hiring attorney for filing with the court.
We will also send copies of the Errata to all ordering parties.
If the signed Errata is not returned by the date above, the original transcript may be filed with the court without the signature of the deponent.

Please send completed Errata to:
Veritext Production Facility
20 Mansell Court, Suite 300
Roswell, GA 30076
litsup-ga@veritext.com
770-343-9696

ERRATA

I, the undersigned, do hereby certify that I have read the transcript of my testimony, and that

___There are no changes

___The following changes are noted:

Pursuant to the governing rules of Civil Procedure, any changes in form or substance which you desire to make to your testimony shall be entered upon the deposition with a statement of the reasons given for making them. To assist you in making any such corrections, please use the form below. If additional pages are necessary, please furnish same and attach.

Page _____ Line _____ Change _____

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Reason for Change _____

Page _____ Line _____ Change _____

_____

Reason for Change _____

Page _____ Line _____ Change _____

_____

Reason for Change _____

Page _____ Line _____ Change _____

_____

Reason for Change _____

Page _____ Line _____ Change _____

_____

1 Reason for Change _____
2 Page _____ Line _____ Change _____
3 _____
4 Reason for Change _____
5 Page _____ Line _____ Change _____
6 _____
7 Reason for Change _____
8 Page _____ Line _____ Change _____
9 _____
10 Reason for Change _____
11 Page _____ Line _____ Change _____
12 _____
13 Reason for Change _____
14 Page _____ Line _____ Change _____
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16 Reason for Change _____
17 Page _____ Line _____ Change _____
18 _____
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DEPONENT'S SIGNATURE
22 Sworn to and subscribed before me this ____ day of
_____, _____.
23
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24 NOTARY PUBLIC
25 My commission expires:_____

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& 1:19 2:2

0

00090 1:9

1

1 3:2 13:7 16:20 23:17 25:16 28:9
10.b 4:4
1001 1:19 2:5
11 1:20 13:16 13:25 16:14 26:20,21
12 5:10 26:12 26:13
12:35 1:21
1500 2:11
16 11:13
1600 2:15
1:05 27:4
1:21 1:4
1:22 1:9

2

2 3:2
20 29:22
200 2:15
20004 2:6
20005 2:11
2015 11:13
2016 12:20
202 2:6,12
2021 11:6,24 16:20 17:11 23:17 25:16
2023 1:20 4:17 28:16
21860 28:17
22nd 4:17 28:16
24 3:7
25 3:7
27 28:9
2738 4:20 28:18
28 3:4

3

3 3:3
30 1:14 5:8 8:22 29:3
300 29:22
30076 29:23
30339 2:16
336-7249 2:16

5

5338 1:4

6

6 1:14 3:3,6 5:8 8:22
654-6704 2:6
662-8600 2:12
678 2:16

7

770-343-9696 29:25

9

9-11-28 4:11
900 2:11

a

above 29:17
academic 9:23 10:21
acceptable 7:16
accessed 23:7
accurate 7:15
achieve 10:12
achieved 10:13
action 16:20
addition 19:10
additional 30:10
address 29:11
administration 9:13,15
adopted 18:11 18:13
advocacy 11:25 12:10
agreeable 6:15 6:24
agreement 1:17
ah 7:12 14:7
ahead 8:4 13:5
al 1:3,6,8
alex 2:10
allowable 5:12
alternative 22:12
alumni 11:17
amended 13:7 13:16
american 9:19 9:21 10:2
announce 21:12,14 22:8
answer 9:2 22:6
answering 24:18
answers 28:7
anywise 28:14
appearances 2:1 3:2
apply 5:16
appreciate 7:6
article 4:4
aside 19:12
asked 24:11
asking 21:21 25:22 26:1
assembly 16:18 17:2,14 18:12 19:8,15 20:13 21:1,5,16 23:11,15 24:13 25:12,15
assist 30:9
associate's 9:25 10:24
association 1:15 11:21
astor 2:3
atlanta 1:2 2:16
attach 30:10

attached 14:15 29:9
attended 6:3
attorney 29:13
attorneys 2:5 2:10,15 15:4 15:19 23:2
available 13:24 14:14,24 17:6 26:3
avenue 1:19 2:5
aware 24:21 26:18

b

b 1:14 5:8 8:22
bachelor's 9:22 10:23
back 29:3
based 14:23
began 6:4
behalf 14:23 16:24 18:24 21:2 22:19 25:24 26:2
believe 11:5,12 17:10 18:14 19:4,9 20:19
berry 2:4
best 21:22
beyond 26:4
bill 19:15
bit 12:1 24:2
board 4:5
brad 1:11
branch 10:16
briefly 9:9
bryan 2:14

c

c 2:3 4:1,11 28:1,1
caption 3:2 28:7
case 1:4,9 3:2 5:11 12:22 15:12 28:13,15
caucus 21:15 22:9,14
cause 1:8 2:2
ccr 1:18 4:20 28:18
celeste 1:18 4:20 28:18
cell 6:20
central 10:4
certain 6:5
certainly 15:3
certificate 3:4
certified 4:8
certify 28:5,11 30:2
challenges 16:20
change 30:12 30:14,15,17,18 30:20,21,23,24 31:1,2,4,5,7,8 31:10,11,13,14 31:16,17,19
changes 29:8 30:5,6,8
chatham 4:3 28:3
circle 2:15
civil 1:18 2:9 5:13 30:7
clarify 6:13 24:25 26:10
clarifying 22:16
clear 22:7 25:9 26:23
clearly 6:9
college 10:4 12:15
commencing 1:21
comment 17:5 20:21,22 22:18
comments 5:6 22:24 23:6,12
commission 31:25
committee 2:8 17:13,16
common 1:8 2:2
communicate 12:4
communicated 17:23 18:1
communication 26:16
communicati... 16:18 17:2 23:14 24:11,12 24:14,15,17,19 24:20,21 25:3 25:4,11,14 26:14
community 5:9 12:5 13:1
complaint 15:5 16:7
complete 11:14
completed 29:20
completely 25:18
completing 12:14,19
concerning 15:20 19:3 21:7
concluded 27:3
conditions 8:11
conference 1:3 2:8
confused 22:4
confusing 6:11
contacted 4:12
contract 4:16
convicted 8:20 9:7
copies 29:14
copy 22:23
corps 10:17,19

correct 7:24 13:3,4,10,14 16:3 18:25 19:1 21:3 22:21 25:13,24 26:20 28:10
corrections 29:8 30:10
council 4:6
counsel 1:17 2:1 5:17 7:23 28:12,13
county 4:3 28:3
court 1:1 4:5,8 4:13 7:15 8:18 29:13,18,22
credibility 8:25
crime 8:20 9:7
crinesha 2:4
crowell 1:19 2:2
crowell.com 2:7
currently 10:5
cv 1:4,9

d

d 3:1 4:1
d.c. 1:20 2:6,11
date 11:7 17:8 17:9 18:16,17 29:3,16
david 1:16 5:3 8:6 24:7 26:13 26:17 29:1,2
davis 2:10
day 4:17 24:2 28:16 31:22
days 29:3
defendant 1:12
defendants 1:7 2:13 5:11
degree 9:13,15 9:25 10:22,24 12:20
degrees 9:20,23 10:21
deliberations 12:6
democratic 21:8,15 22:9 22:14
deponent 1:16 29:6,7,10,18
deponent's 31:21
deposition 1:14 5:7,8,21 6:4,21 7:18 8:9,13,15 13:8,17 27:3 29:7 30:9
depositions 5:15 15:12
describe 12:2
designated 12:25 13:15 14:19
desire 30:8
development 5:9 11:12 13:1
diane 2:14
direction 28:8
director 11:25 12:7,9
discharged 10:18
disclosure 4:7
discovery 5:11
discussed 16:12
discussions 16:5
disqualified 4:9
district 1:1,1
division 1:2
dlaross 2:17
due 29:3
duly 5:4
duma 2:13

e

e 3:1 4:1,1,1 6:20 28:1,1,2
e5 10:15
earlier 16:9
early 11:6 17:10,11
education 9:10 9:12
either 11:6
elb 1:5,10
eleazar 2:20
elected 1:15 12:4
elena 2:20
employ 28:13
employed 4:12
employee 11:10
employment 11:2 12:12
english 2:13
entered 30:8
entirely 25:19 25:21
errata 29:3,9 29:10,12,14,16 29:20 30:1
et 1:3,6,8
evidence 28:10
exact 11:7 17:9 18:7 19:20 20:17
exactly 20:9
examination 3:5 6:1 24:8 25:6
exhibit 6:22 13:7 14:15
exhibits 13:6
expecting 7:3
expires 31:25

f

f 28:1
facility 29:21
far 9:11 24:18
federal 1:17 5:13
filed 29:17
filing 29:13
first 5:4 13:20 14:3

five 12:19 16:15
follow 24:4
following 4:7 5:1 30:6
follows 5:5
foregoing 28:5 28:9
form 30:8,10
formulate 12:3
forward 29:12
frame 18:21
front 21:20
full 8:5 13:21 13:22 14:5
fully 8:8,12
fund 5:9 7:19 11:3,4,9,24 12:8,12,16 13:1 14:18,23 14:24 16:24 18:25 21:2,12 21:14 22:8,20 22:23 23:14 24:15,20 25:2 25:2,15,24 26:2,3,4
fund's 17:1 18:1 19:7
furnish 30:10
further 23:20 23:24 28:11

g

g 28:2,2
ga 29:23,24
galeo 5:9 7:19 11:4,12,15,21 12:25 18:1
galeo's 17:23
garcia 1:16 5:3 6:3,24 7:11 8:4 8:6,7 9:6,9 12:24 22:4 23:11 24:1 25:10 27:1 29:1,2
general 9:25 16:18 17:2,14 17:19 18:12 19:8,15 20:13 21:1,5,16,22 23:11,15 24:13 25:12,15
generally 12:16 17:22 21:21
georgia 1:1,3,6 1:14 2:8,16 4:2 4:6,8,16 9:16
gerardo 2:20
given 28:10 30:9
giving 7:18
go 7:10 8:4 11:1 13:5 26:4
goes 8:24
gonna 22:5
gonzalez 2:20 6:19 7:20,24 16:1,6
gonzalez's 5:15 6:4
governing 30:7
graduate 12:20
great 6:17 7:13
greetings 29:5

h

h.l. 2:3
ha 7:12 14:7
hang 26:23
head 18:20
hearing 15:10 28:11
heaven 2:3
held 11:24
hereto 14:16
highest 9:12 10:13
hiring 29:13
hold 9:23 11:20 11:23 12:11
honorably 10:18
hospital 7:7
houk 2:9

i

include 15:18
included 21:19
including 20:19 20:20
index 3:3
individual 26:11
inform 12:5
information 13:23 14:13,23 26:3
instructing 9:2
instructions 6:5,14
interest 4:10
interested 28:15
introduced 19:7,14 21:15 22:9
introducing 22:11
involve 16:6
involved 26:5

j

january 1:20 4:17 16:20 23:17 25:16 28:16
jerry 16:1,5 25:3 26:11,15 26:17
job 12:3
joined 12:15
judicial 4:6
julie 2:9

k

k 2:11
keep 6:22
kin 28:12
kind 12:16
know 6:6,8,12 7:6,7,8 9:10 13:12 17:8 18:19 19:14 22:5 23:4 24:1 25:18,20
knowledge 26:2
known 13:24 14:13,24

l

l 4:1
laross 2:14 3:6 3:7 5:6,19,24 6:2 8:24 9:5 16:4 22:2 23:9 23:19,24 24:6 24:10 25:5,7 26:19,22
late 11:6
latino 1:15 5:9 12:25
latonya 2:4 7:23
law 2:5,9,10,15 4:16
laws 16:19
lawyers 2:8
layman 2:3 3:7 5:18,22 8:21 9:3 15:25 21:25 23:5 24:4,7,9,24 26:10,21
leaders 12:5
leadership 11:11,14,18
legal 4:13
legislator 19:14
legislators 19:11 21:9
level 9:12
limited 26:15
line 30:12,15 30:18,21,24 31:2,5,8,11,14 31:17
listed 14:15,20
litsup 29:24
little 12:1 22:3
llp 2:2,13
long 24:2
look 13:6,11 14:8,9 16:14
loudly 6:8

m

m 2:9 4:1
mack 1:18 4:20 28:18
made 24:12,14 24:16,17,19,20 25:2,16
mail 6:20 29:11
make 4:6 5:7 6:6 22:6 25:8 26:22 30:8
making 25:2 30:9,9
mansell 29:22
maps 18:11 19:3,7,15 21:10,15 22:9 22:11,12,13,14
marine 10:17 10:19
master's 9:13 9:15 10:22
matter 8:23 17:24
mean 11:17 18:1 26:19
media 6:20
medical 8:11
medications 8:8
memory 21:22
mention 19:6
mentioned 9:24 16:9 18:24
military 9:19 9:21 10:2,6,10 10:14,16
minute 26:24
misunderstood 20:12 24:25
moment 23:20 23:22
moral 9:7
moring 1:19 2:2

n

n 3:1 4:1
naacp 1:3 2:8
name 8:5 18:8
named 8:2
necessary 30:10
need 5:7 7:7,13
nonprofit 12:18
northern 1:1
notarized 29:10
notary 31:24
noted 30:6
notice 1:16 13:7,11,16,19 14:20 16:15
noting 29:8
november 11:5 11:6 17:10,11
number 5:10 13:16 16:14 20:17
nw 1:19 2:5,11

o

o 4:1 28:2
o.c.g.a 4:10
object 9:1
objection 8:21
objections 5:14
obligation 25:23 26:8
obviously 6:21 7:8

october 11:5,6 11:24
office 7:19
offices 29:3
officials 1:15 12:5
oh 13:10 15:11 24:6
okay 5:17,18 5:24 6:17 7:4,8 7:10,13 9:6,14 10:21 13:5,9 14:8,12 15:11 16:16,17 17:25 18:4,19 20:12 20:15,22 22:3 22:16,16 23:4 24:18,23 25:5 25:8,14 26:19 26:23
once 20:13 29:10
online 17:5
open 13:6
opposition 19:7
order 15:22
ordering 29:14
organization 13:24 14:14
organization's 16:17
original 29:17
outside 12:12

p

p 2:14
p.m. 1:21 27:4
page 3:2,2,3,3,4 3:6,7,7 13:20 13:20 14:6 16:15 30:12,15 30:18,21,24 31:2,5,8,11,14 31:17
pages 28:9 30:10
paragraph 13:21 14:4,5 14:10
parkwood 2:15
part 22:10
participating 8:9,13
particular 13:2 17:13
particularly 5:10 13:25
parties 28:12 28:14 29:15
patience 24:1
patiently 6:3
pause 23:8,23
pennsylvania 1:19 2:5
people 8:2
person 6:6 13:22,22 14:12 14:19 17:3
personally 26:5
phone 6:25
phones 6:20
physically 7:1
place 7:19
plaintiffs 1:4,9 2:2 12:22
please 29:7,11 29:20 30:10,10
point 18:10 20:2,6 24:5 25:9
policies 16:19
policy 11:25 12:3,6,9
political 9:22 10:23
portal 17:6 20:23 22:19,24 23:7,13
position 12:7 17:23 18:2
positions 11:21 11:23 12:4,11
prepare 15:2 15:15,23
prepared 16:24
present 2:20 16:21 23:17 25:17
prevent 8:8,12
prevented 21:4
prior 11:8
procedure 1:18 5:13 30:7
proceeding 4:14,15
proceedings 5:1 23:8,23
produced 5:4 23:1
production 29:21
program 11:12 11:15,18
prohibited 4:16
protocols 16:19
provide 4:13
provisions 4:10
public 9:13,15 17:5 20:21,22 23:6,7,12 31:24
publicly 19:3 21:9
purposes 5:11 5:12
pursuant 1:16 4:4 30:7
put 26:11

q

question 9:4 17:20 20:3 22:1,5 24:10 24:11 25:1,19 25:21
questioning 24:3
questions 6:13 7:14 23:21,25

26:25 28:7
quickly 11:1

r

r 4:1 28:1,2
raffensperger 1:11
rank 10:12,13
read 5:20 15:5 29:6 30:2
reading 19:23
ready 13:23 14:13
really 9:9
reason 26:12 30:14,17,20,23 31:1,4,7,10,13 31:16,19
reasonably 13:24 14:14,24
reasons 30:9
recall 18:14 19:16,20,25 20:5,17 21:17 22:10,13
receive 9:14,20
record 8:5 22:7 26:23
redistricting 15:9,10 16:10 17:4 18:2,6,9 18:11 21:7 24:13
reduced 28:8
referring 14:2 20:10
regarding 13:25 14:15 16:19
regular 28:13
regulations 4:5
related 18:7
relationship 4:9
relevant 8:22
remember 11:7 17:9 18:7,22 19:23 21:18
remembered 18:20
remote 1:14
repeat 17:20 20:3 21:25
rephrase 9:3
reporter 3:4 4:8 7:15
reporting 4:5 4:14
represent 28:9
representative 13:2
requested 6:18
reservations 5:14
reserved 29:6
respond 7:14
result 28:15
returned 29:12 29:16
review 29:7
reviewing 19:22
right 5:24 7:20 13:14 15:1,13 15:14 16:2 18:3,18 19:20 20:14,15,24 24:21 25:12 26:6 29:6
rights 2:9
room 7:22 8:1
roswell 29:23
rpr 1:18 4:20 28:18
rules 1:17 4:4 5:13 30:7

s

s 4:1,1,1
says 14:12
school 9:11
science 9:22 10:23
scj 1:5,10
sdg 1:5,10
seal 29:12
second 13:20 13:21,22 14:5 14:9
sector 12:18
see 14:1,7,10,16 16:21 23:20
self 4:12
send 29:14,20
sent 22:18
sentence 13:22 14:1,9,16
served 10:10
services 4:14
serving 10:5,13
session 15:10 16:10 17:4 18:6,8,9
set 7:10 13:12 13:13
several 20:10
share 6:22
shawn 2:3 7:23 26:20
sic 26:12,13
sign 5:21 29:6
signature 28:17 29:2,18 31:21
signed 29:10,11 29:16
silenced 6:25 7:4
sir 7:9 24:3 27:2
sit 19:25 20:4 21:23
six 12:19
slayman 2:7
smith 2:4
social 6:20
solutions 4:13
somebody 7:6
sorry 13:11,11 13:20 14:3 15:25 17:20

20:3 21:13 24:6 25:20
speak 6:8 15:18 15:22 19:2,11 21:8
speaking 15:4 18:24
speaks 6:7
special 15:10 16:9 17:4 18:6 18:8
specific 20:1,5 20:11 22:22
specifically 18:4 25:1 26:14
spoke 19:18 23:12 25:4 26:17
start 11:2 21:13
state 1:3,6 2:8 4:2 8:5 9:16
stated 28:6
statement 30:9
statements 9:1
states 1:1 13:21
stipulations 5:15
street 2:11
studies 10:1
submitted 17:5 20:23 22:24 23:13
subscribed 31:22
substance 17:18,21 30:8
suite 2:11,15 29:22
support 21:12 21:14 22:8
supported 21:9
supporting 22:15
sure 6:6 17:21 20:4 22:6 25:8 25:19 26:22
sworn 5:4 31:22

t

t 4:1,1,1 28:1,1
take 7:15 13:11 23:19
taken 5:10 8:7 28:6
taylor 2:13
taylorenglish... 2:17
tell 12:1,16 17:1 18:4
testified 5:5 7:20 8:15,18 17:3,7 18:5,10 20:1,5,9,13,25 25:11
testify 13:1,15 13:23 14:13,19 16:24 20:16 25:24 26:2
testifying 21:5 26:13
testimony 3:3 14:22,25 15:3 15:9,12,16,20 15:23 16:8,9 17:17,19,22 18:16,21,23 19:2,5,6,11,12 19:21 21:19,22 22:11 23:10 30:3,8
texas 10:4
thank 7:8 22:16 23:25 24:3 27:1
thereto 28:7
think 18:23 19:16,21,21,22 22:3,5 24:25 25:4,21
three 20:18 21:1 23:11
time 6:7 11:8 12:15 18:21 23:25 24:1 27:1,2
times 20:10,16 20:18,19 21:1 23:11
title 12:9
today 8:8 14:22 14:25 15:3,16 15:20,23 16:24 19:25 20:4 21:23 25:23
today's 13:8
top 18:20
topic 5:10 8:22 13:2,16,25 14:20 16:14,21 16:23 26:12,13 26:20,21
topics 14:15
transcript 7:16 17:16 18:15 19:5,17,24 21:18,20 28:6 28:10 29:8,17 30:3
transcripts 15:6,7,8,11 16:8 19:22
true 28:10
truthfully 8:9 8:12
turn 6:19,23 7:2,5 13:19
turpitude 9:7
two 14:6 16:11 20:18,25 23:10
typewriting 28:8
tyson 2:14

u

u 4:1
under 1:17 2:9 4:10,15 5:12 28:8

undergraduate 9:17
undersigned 30:2
understand 6:12 12:24 13:10,15 14:18 25:10,19,21,23 26:7
understanding 14:25 17:15 19:19 22:13 24:14
united 1:1
unity 19:3,15 21:9,13 22:11 22:13
university 9:16 9:19,21 10:3
unrelated 8:22
use 30:10

v

verbally 7:14
veritext 4:13 29:21
veritext.com 29:24
volunteer 11:11
vs 1:5,10

w

wait 24:2
want 5:19 7:1 11:1 22:6
wanted 24:24
washington 1:20 2:6,11
wednesday 1:20
went 6:5 11:11 16:7
wit 5:2
witness 5:5,20 8:24,25 16:2
word 21:19,19
wording 19:20
work 9:18 11:3 12:1,2,12,16
worked 11:8 12:18,21
working 11:4
written 22:23

x

x 3:1

y

yeah 5:22 7:5 14:8 18:19 21:21 25:22 26:21
years 12:19

z

zoom 6:22

Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

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