EXHIBIT K

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

GEORGIA STATE CONFERENCE OF THE NAACP, et al.	)	
Plaintiffs,	)	CASE NO. 1:21-CV-5338 ELB-SCJ-SDG
vs.	)	
STATE OF GEORGIA, et al.,	)	
Defendants.	)	
COMMON CAUSE, et al.,	)	
Plaintiffs,	)	CASE NO. 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 GERARDO ELEAZAR GONZALEZ, 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 9:05 a.m.

example, during the election we invited our members to participate in Taco Tuesday to the poles. We had -- we provided tacos for folks and started reminding people about going to the poles during the early voting process, as an example.

MS. LaROSS: And Shawn, in response to supplemental response to discovery, the FUND has disclosed under an AAO designation the name of a member who's been affected by redistricting. And I obviously -- we don't want to say her name here, but I do want to ask just a couple of questions about that.

And then you can tell me if we need to designee this portion of the deposition as a -- I'm trying to avoid that, but if we need to, just let me know; is that acceptable?

MR. LAYMAN: Yes. Yeah, just to the -- I'll let you ask the questions and just object.

MS. LaROSS: Okay. And you can object as I ask the question, if need be. I'm not trying to lock you in there.

BY MS. LaROSS:

Q. Okay. So Mr. Gonzalez, are you aware, and we don't want to say the name of the person,

but that one member of the FUND has been identified as having been affected by redistricting?

A. Yes.

Q. And what process did the FUND undertake to determine that individual?

MR. LAYMAN: Objection to the extent that it covers attorney/client privilege, and conversations you had with an attorney or any work product.

MS. LaROSS: Sure.

BY MS. LaROSS:

Q. Other than discussions with your attorney, what did the FUND do to determine that particular individual?

A. We looked at our membership list and made sure that we had addresses for the folks that we were looking at and made sure that they were in concert with what we were particularly looking for.

Q. And what district does that person reside in?

A. I don't know the particular district, but I know that the district is within Dekalb County.