EXHIBIT L

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-
v.) ELB-SCJ-SDG
STATE OF GEORGIA, et al.)
)
Defendants.)

_____

COMMON CAUSE, et al.,)
Plaintiffs,) Case No.
v.) 1:22-CV-00090-
BRAD RAFFENSPERGER) ELB-SCJ-SDG
Defendant.)

_____

The DEPOSITION of:
HELEN BUTLER
Being taken pursuant to stipulations herein:
Before Kathryn Taylor, CCR
FRIDAY, JANUARY 13, 2023
Commencing at 9:00 a.m.
All parties, including the court reporter, appeared by videoconference.

Q. So maybe what we can do is this: If you want to jump back to Exhibit Number 4, the complaint, and we'll go to page -- page 15. Again, I'm sorry. This is a lot easier when we're in the same room and I can -- we can keep the documents open in front of us.

A. I have it.

Q. Okay. On page 15, and I wanted to ask -- what I am asking about is paragraph 45.

It says, "The GCPA brings this action on behalf of itself and its individual members who are registered voters residing in Georgia House, State Senate, and Congressional districts where their voting power will be reduced under the new plans."

Do you see that?

A. Yes.

Q. And so what I'm asking is just, does the Peoples' Agenda have a way to determine which House, Senate, and Congressional districts its individual members reside in?

A. They have a way of determining -- let's see, we can -- we go by our members, where they live, and by the voter files.

Q. Okay. And, again, I'm not asking for anything that might have come from work with your lawyers on this topic, but I'm just ask -- I'm just

1 going to ask: Unrelated to that, did the Peoples'
2 Agenda do any analysis of which House, Senate, and
3 Congressional districts its members live in either
4 before filing a lawsuit or after filing it?
5 A. I think that, again, is something we work
6 with our counsel on.
7 Q. Okay. Then that's totally fine. There also
8 is the name of one individual that was provided in the
9 discovery responses. And to make things easier, I
10 don't want to put that person's name on the transcript
11 of the deposition. But does the Peoples' Agenda know
12 what district for House, Senate, and Congress the
13 identified member lives in?
14 A. We know, yes.
15 Q. And what districts are those?
16 A. I didn't look at them to refresh my memory on
17 it -- the numbers, but I know he lives in Cobb County,
18 in the Cobb County districts.
19 Q. Okay.
20 A. The numbers change, so, you know . . .
21 Q. Yes. My district numbers change too. You
22 get used to that.
23 A. Uh-huh.
24 Q. All right. So next, let's go ahead and go to
25 the next topic, which is Topic Number 9, which is,

"Whether and how the Organization determined if any of its individual members are impacted by the laws, policies, and protocols challenged in this action."

And I think based on your answer earlier, this -- this may be one there's not a whole lot to talk about. But just to clarify, you're the designee for Topic 9, right?

A. Yes.

Q. And is there any method the organization used to determine whether its individual members were in districts that it challenges that did not involve working with your lawyers to make that determination?

A. No.

Q. Okay. Then that is definitely our shortest topic yet. So I suspect Number 10 may be similar, but let's move to that one. Topic 10, "The method(s) used by the Organization to challenge" -- I'm sorry -- "to determine which district(s) it would challenge in this action."

MR. TYSON: And, Crinesha, I know this is one that y'all had not planned to produce a witness on. And I'm assuming based on Ms. Butler's answer to Number 9, every answer to the methods used would also be privileged; is that right?

MS. BERRY: That's correct.