EXHIBIT J

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.

DEPOSITION OF GERALD GRIGGS

30(B)(6) REPRESENTATIVE

THE GEORGIA STATE CONFERENCE

OF THE NAACP

JANUARY 18TH, 2023 - 9:00 a.m.

Through Video-Conference

Via ZOOM,

Inna Russell, RPR, CCR #1-1-1-1

Q. Are you able to testify on how many members of the Conference were affected by the re-districting?

A. No, I can't give a single number because I haven't -- I haven't seen that, that research, but I do know it was a lot.

Q. Do you know what would be involved in trying to find out that number?

A. Talking to the individual units.

Q. Is there any particular reason why you talked to Dantaye Carter for this topic?

A. Because I know that he lived in the sixth district and was drawn out of the sixth into the seventh.

Q. Topic 10, The methods used by the Organization to determine which districts it would challenge in this action.

MR. BOYLE: My understanding, counsel, is that you are not allowing testimony on this topic based on privilege; is that correct?

MR. HEAVEN: Exactly. Yes, that's right.

MR. BOYLE: I'll just note, for the record, that we, unless I've missed something, we don't concede to that, but we'll just move on for today's purposes.

BY MR. BOYLE: