

# EXHIBIT H

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

COAKLEY PENDERGRASS, et al., )  
)  
Plaintiffs, )  
)  
v. ) CIVIL ACTION FILE NO.  
)  
BRAD RAFFENSPERGER, et al., ) 1:21-CV-05339-SCJ  
)  
Defendants. )

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The DEPOSITION of:

COAKLEY PENDERGRASS

Being taken pursuant to stipulations herein:

Before Kathryn Taylor, CCR

THURSDAY, DECEMBER 15, 2022

Commencing at 3:00 p.m.

All parties, including the court reporter, appeared by  
videoconference.

Job No. 5623315

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1 A. Yes.

2 Q. Thank you. And did those documents help  
3 refresh your recollection as to the events that you  
4 will testify to here today?

5 A. Yes.

6 Q. All right. And do you have any documents or  
7 notes with you today?

8 A. No, I don't.

9 Q. And do you have any notes or memos or other  
10 documents that relate in any way to this case?

11 A. I do not.

12 Q. All right. Moving on, we will talk a little  
13 bit about your background.

14 Can you please state your full name again for  
15 the record, and your current address?

16 A. My name is Coakley Purdy, P-u-r-d-y,  
17 Pendergrass. That was my grandfather's name, so don't  
18 laugh at me.

19 Q. I'm not laughing. I think it's a really  
20 unique name.

21 And what's your current address?

22 A. [REDACTED], Marietta, Georgia [REDACTED]

23 Q. And since we're appearing virtually today,  
24 where are you testifying from?

25 A. From my home at [REDACTED].

1 Q. Thank you. And how long have you lived at  
2 that address?

3 A. Twenty-plus years.

4 Q. And how long have you lived in Cobb County?

5 A. I'd say twenty-five -- twenty-five-plus  
6 years.

7 Q. What about the state of Georgia?

8 A. Twenty-five-plus years.

9 Q. And what was that other Cobb County address?

10 A. I don't remember. I'm sorry.

11 Q. That's okay. And, again, my questions aren't  
12 to confuse you. So if you don't know the answer to one  
13 of my questions, saying "I don't know," is a perfectly  
14 fine answer.

15 A. Thank you.

16 Q. Have you ever resided in any other county in  
17 Georgia?

18 A. No.

19 Q. Have you ever resided in any other state?

20 A. Yes.

21 Q. And what states would that be?

22 A. New York.

23 Q. Is that where you are originally from?

24 A. No. I was born and raised between New York  
25 and South Carolina.

1 A. Yes.

2 Q. Of course I know the big chicken.

3 A. Okay. Yeah, they moved it from Whitlock over  
4 to that area. That's now the main voting area. You're  
5 familiar -- are you -- okay. So you are familiar with  
6 our area.

7 Q. A little bit. I moved here in 2016, so . . .

8 A. Yes, yes.

9 Q. All right. And how about the runoff? Did  
10 you vote in the same location?

11 A. No. The runoff, that would -- that would --  
12 early voting was at the Whitlock office.

13 Q. Okay.

14 A. And I voted early and -- and try to do my  
15 duty. Civics 101.

16 Q. All right. Moving on to your political  
17 affiliations. Do you consider yourself to be a member  
18 of the Democratic Party?

19 A. I do.

20 Q. Do you know when you became a member of the  
21 Democratic Party?

22 A. No. I don't know exactly when, no.

23 Q. Has it been since you started voting?

24 A. Yeah.

25 Q. Okay.

1 A. Yes. Since I started voting, yes.

2 Q. Okay. And have you held any leadership  
3 positions in the Democratic Party?

4 A. In the -- yes. I have been a state committee  
5 member for the Democratic Party. I have been vice  
6 president of the Cobb County Democratic Committee, I  
7 have been vice president of the Democratic Party of  
8 Georgia, Georgia's African American Caucus.

9 Q. All right. So -- and with your state  
10 committee member position, what years would that have  
11 been?

12 A. My -- I was replaced this year, so it would  
13 have been for the last six years.

14 Q. So would that have been 2016?

15 A. Yes.

16 Q. Okay. Lawyers are notoriously bad at math,  
17 so I wanted to make sure that that was correct.

18 A. And I'm -- and I'm feverishly trying to  
19 figure it out as we speak. I do believe it would have  
20 included 2016.

21 Q. Okay. What about the time period for the --  
22 was a vice president of the Cobb Democratic Committee?

23 A. Let's see, that would have been -- when was  
24 it? '14, '13, '12 -- I think '12 -- '11, and I think  
25 the -- I think that's -- somewhere there is -- it

1 began.

2 Q. Somewhere in 2011?

3 A. Yes.

4 Q. Okay. And when did it end?

5 A. Last -- let's see, this is 2022. 2021 --  
6 beginning of 2021. You know, don't hold this against  
7 me, but I'd have to say this, give or take a year. I  
8 don't have it written down.

9 Q. That's okay. I won't expect you to know the  
10 exact dates.

11 And what made you want to leave the --  
12 deposition?

13 A. I have -- I've been doing this type of work  
14 I'd say for the last 25 years, and I -- January 10th, I  
15 turn 78.

16 Q. Well, happy early birthday.

17 A. Thank you. And COVID and all of this other  
18 stuff, all this community activity, and then -- okay.  
19 And that's basically -- that's basically it.

20 Q. And what years were you vice president of the  
21 Democratic Party Georgia African American Caucus?

22 A. Somewhere within the first -- first four  
23 years of the time period that I gave you.

24 Q. Okay. Starting in 2011?

25 A. Somewhere in there, yes.

1 Q. Okay. Thank you. Have you ever participated  
2 in any activities of the Democratic Party?

3 A. You'll have to repeat that.

4 Q. Have you ever participated in any activities  
5 at the Democratic Party, other than these committees?

6 A. Activity such as?

7 Q. Voter registration drives, things like that.

8 A. For the DPG, as opposed to our local caucus.  
9 Is that what you are asking me?

10 Q. Either one.

11 A. Yes. Voter registration is -- remains  
12 steady.

13 Q. Okay. Can you think of any other activities?

14 A. No.

15 Q. Have you ever considered yourself to be a  
16 member of the Republican Party?

17 A. No.

18 Q. Is it fair to say you generally support  
19 Democratic candidates for election in Georgia?

20 A. Yes.

21 Q. Have you ever voted for a Republican  
22 candidate?

23 A. Yes.

24 Q. Do you remember who?

25 A. I crossed over, and no, I don't remember. I



1 A. No.

2 Q. And you've already mentioned that you worked  
3 on this one political campaign. Have you ever worked  
4 on any other political campaigns?

5 A. I've supported candidates. I've held  
6 different candidates in Cobb County running for office.

7 Q. How did you support them?

8 A. I would volunteer or donate.

9 Q. Do you remember which candidates in Cobb  
10 County?

11 A. Almost every Democratic candidate that's run  
12 starting -- you could take it back with some -- from  
13 one -- it would be -- it would behoove you to  
14 financially support a candidate. So a few dollars of  
15 donation, that type of thing, or to pick up or to get a  
16 yard sign or that type -- you know, or that type of  
17 activity.

18 Q. All right. Moving onto the history of this  
19 case. When did you first learn about this lawsuit?

20 A. Locally, I was -- my name was put in, and I  
21 was recommended to consider being a part of it.

22 Q. Do you know what time period that was?

23 A. I'd say -- I really don't. Things have been  
24 happening so fast, and particularly my situation with  
25 my knee, I -- I'm just -- things have been a blur.