

EXHIBIT J

Pendergrass, Coakley, et al. v. Raffensperger, Brad, Et Al.

Page 1

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

COAKLEY PENDERGRASS, et al.,

Plaintiffs,

v.

Civil Action File

BRAD RAFFENSPERGER, et al.,

No:

Defendants.

1:21-CV-05339-SCJ

VIDEOCONFERENCE DEPOSITION OF

ROBERT RAY RICHARDS

DATE: Monday, December 5, 2022

TIME: 1:08 p.m.

LOCATION: Remote Proceeding

Powder Springs, GA [REDACTED]

REPORTED BY: Daniel Almekinder, Notary Public

JOB NO.: 5609279

1 discussed with your attorney.

2 So I just want to make sure that you know
3 that I'm not referring to that. It's just simply --
4 because I would understand that you spoke with your
5 lawyer before the deposition. Would that be correct?

6 A Yes.

7 Q Did you speak with anyone else outside --

8 A I have not.

9 Q Okay. Have you made any notes or memos or
10 documents -- or written documents or electronic
11 documents that relate in any way to this case?

12 A No.

13 Q You mentioned earlier, Mr. Richards, that
14 you live on [REDACTED] in Powder Springs; is that
15 correct?

16 A Yes. It's hard to say. Yes.

17 Q Okay. I know. I almost said [REDACTED] but I
18 can see that it's [REDACTED].

19 And how long have you lived at that address?

20 A 2016. June 2016.

21 Q And that address is in Powder Springs;
22 correct?

23 A It is, yes.

24 Q And in Cobb County; correct?

25 A Yes.

1 I can just give you the -- the -- we -- the center off
2 Dallas Highway. Ron Anderson. So we can vote in
3 varying locations when you early vote, as you know, as
4 long as it's in the county. So we just go to
5 different locations depending on what the wait time is
6 because you -- there's an app, and you can see the
7 wait time.

8 Q So do you think in November 2022, that you
9 voted at the location off of Dallas Highway that you
10 described -- the Ron Anderson --

11 A I'm pretty -- I'm pretty sure I did, yeah.

12 Q And for the runoffs tomorrow, I understand
13 that you -- did you vote early for that election?

14 A I've already voted, yes.

15 Q And where did you vote for the -- tomorrow's
16 runoff election?

17 A The one over by Tapp Middle School, my
18 daughter's middle school. I may have the name
19 confused, but it's over by Tapp Middle School, and
20 it's in Powder Springs.

21 Q Do you consider yourself a member of the
22 Democratic Party?

23 A I do.

24 Q How long have you been a member of the
25 Democratic Party?