

EXHIBIT I

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

CASE NUMBER: 1:21-CV-05339-SCJ

COAKLEY PENDERGRASS, et al.,
PLAINTIFFS,

V.

BRAD RAFFENSPERGER, et al.,
DEFENDANTS.

DEPOSITION TESTIMONY OF:

ELLIOTT HENNINGTON

December 13, 2022

S T I P U L A T I O N S

IT IS STIPULATED AND AGREED by and
between the parties through their respective
counsel that the deposition of ELLIOTT
HENNINGTON may be taken before Mallory B.

1 A. No.

2 Q. And have you discussed this case
3 with anyone other than your lawyer?

4 A. No.

5 Q. Have you discussed this deposition
6 with anyone other than your lawyer?

7 A. No.

8 Q. Did you review anything prior in
9 preparation for this deposition?

10 A. Just discussion with my lawyer.

11 Q. And do you have any documents or
12 notes physically with you today?

13 A. No.

14 Q. And so we've got through that.
15 That's pretty easy. We'll shift gears again.
16 Could you just again state your full
17 name for the record.

18 A. Elliott Hennington.

19 Q. And, Mr. Hennington, what is your
20 current address?

21 A. [REDACTED] Powder Springs,
22 Georgia [REDACTED]

23 Q. And is it correct that that address

1 is in Cobb County?

2 A. Yes.

3 Q. And could you repeat that city name
4 one more time? Sorry.

5 A. That's okay. Powder Springs; Powder
6 Springs, Georgia.

7 Q. And how long have you lived at that
8 address in Powder Springs?

9 A. Since August of 2004.

10 Q. Since living at that address in
11 Powder Springs in August 2004, have you lived
12 or resided at any other address?

13 A. No.

14 Q. And where did you live before that
15 address in 2004?

16 A. Mount Holly, New Jersey.

17 Q. Did you say Mount Holly?

18 A. Yes, Mount Holly, New Jersey.

19 Q. And can you describe for us how --
20 the type of geographic region that Mount
21 Holly, New Jersey is?

22 A. South of New York, a little north of
23 Philadelphia, right off of the turnpike,

1 Q. Can you give a description of where
2 you voted?

3 A. Yes, at advance voting place at
4 south Ron Anderson building, recreation
5 center, in Powder Springs, New York.

6 Q. So you voted early?

7 A. Correct.

8 Q. And how about -- so -- sorry to --
9 to go back a little bit, was that in the
10 runoff or the most recent general election?

11 A. The last one was a special and a
12 runoff.

13 Q. And that was the one we were just
14 describing, right?

15 A. Correct.

16 Q. And then how about in the general;
17 do you remember which precinct you voted
18 there?

19 A. It would've been the same one.

20 Q. Same.

21 A. Same location.

22 Q. Let's shift a little bit.

23 Do you consider yourself to be a

1 member of the Democratic Party?

2 A. Yes.

3 Q. And for how long have you considered
4 that?

5 A. I guess ever since I been voting
6 regularly.

7 Q. So would that have been probably the
8 mid '70s?

9 A. Yes. More like the '80s.

10 Q. And have you ever held any
11 leadership position in the Democratic Party?

12 A. No.

13 Q. Have you ever held any position or
14 served on any committee in the Democratic
15 Party?

16 A. No.

17 Q. And have you participated in
18 activities of the Democratic Party?

19 A. No, no.

20 Q. And so is it safe to say that you've
21 never considered yourself a member of the
22 Republican Party?

23 A. Yes.

1 Q. And it would also be fair to say you
2 generally support Democratic candidates for
3 election in Georgia?

4 A. Yes.

5 Q. And so have you ever voted for a
6 Republican candidate?

7 A. Not to my knowledge.

8 Q. And we've kind of covered it
9 earlier, but just real quick, have you ever
10 been a member or held a position in
11 connection with any other political party?

12 A. No.

13 Q. Have you ever worked on any
14 political campaigns?

15 A. Yes.

16 Q. Which ones?

17 A. President Obama's campaign.

18 Q. And how would you describe your role
19 in working on that political campaign?

20 A. Just at one of the headquarters,
21 getting people registered to vote, opening
22 and closing the building, phone banking.

23 Q. And was that for both Obama

1 campaigns or just one?

2 A. More so the first one.

3 Q. But maybe a little bit with the
4 second one?

5 A. Yes.

6 Q. And, again, this is something we
7 covered a little bit earlier, but have you
8 had any type of involvement with voter
9 advocacy groups ever?

10 A. No.

11 Q. And so let's now shift to discussing
12 the lawsuit.

13 How did you first hear about the
14 lawsuit that you got involved with?

15 A. I was approached.

16 Q. And who were you approached by?

17 A. I guess my name was given to the --
18 to the law firm that's representing me.

19 Q. And can you describe the nature of
20 the initial contact that occurred?

21 MR. JONES: We'll just object to the
22 extent that this question seeks any
23 information that's covered by the