

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

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

A P P E A R A N C E S

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I N D E X

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EXAMINATION:

PAGE

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By Ms. LaRoss

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E X H I B I T S

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NO.

DESCRIPTION

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(None marked.)

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P R O C E E D I N G S

THE REPORTER: Good afternoon. My name is Daniel Almekinder; I am the reporter assigned by Veritext to take the record of this proceeding. We are now on the record at 1:08 p.m. Eastern.

This is the deposition of Richard -- excuse me -- Robert Richards taken in the matter of Coakley Pendergrass, et al. vs. Brad Raffensperger, et al. on December 5th -- December 5, 2022, at [REDACTED], Powder Springs, Georgia [REDACTED]

I am a notary authorized to take acknowledgments and administer oaths in Georgia. Parties agree that I will swear in the witness remotely.

Additionally, absent an objection on the record before the witness is sworn, all parties and the witness understand and agree that any certified transcript produced from the recording of this proceeding:

- is intended for all uses permitted under applicable procedural and evidentiary rules and laws in the same manner as a deposition recorded by stenographic means; and
- shall constitute written stipulation

1 of such.

2 At this time will everyone in
3 attendance please identify yourself for the record.

4 MR. JONES: Good afternoon. Michael
5 Jones of the Elias Law Group. I'm counsel for
6 Plaintiff, Robert Richards. And I'm joined this
7 morning by Jonathan Hawley.

8 MS. LAROSS: Good morning. It's Diane
9 LaRoss from Taylor English, and I represent the --

10 THE REPORTER: I'm sorry, ma'am, your
11 audio cut out there. The last thing I got was, I
12 represent.

13 MS. LAROSS: I represent the defendants
14 in this matter. And I'm joined by a few attorneys
15 this morning, all from our law firm, and they are Don
16 Boyle, Bryan Jacoutot, Dan Weigel, Hannah Clapp,
17 and -- let me make sure. And that's all we have so
18 far. We might be joined by Bryan Tyson. I'm not sure
19 if his schedule will permit that.

20 THE REPORTER: And he is here, ma'am,
21 just to let you know.

22 MS. LAROSS: Oh. Sorry about that,
23 Bryan. I just saw you.

24 MR. TYSON: No problem. I won't take
25 it personally.

1 MS. LAROSS: Yeah. He knows my
2 technology abilities are a little challenged at times.

3 THE REPORTER: All right. And Mr.
4 Richards?

5 MR. RICHARDS: And I am Robert
6 Richards. I'm one of the plaintiffs.

7 THE REPORTER: All right. Thank you.

8 Hearing no objection, I will now swear
9 in the witness.

10 Sir, please raise your right hand.
11 State and spell your name for the record, if you
12 would.

13 MR. RICHARDS: Robert Ray Richards.
14 R-O-B-E-R-T. R-A-Y. R-I-C-H-A-R-D-S.
15 WHEREUPON,

16 ROBERT RAY RICHARDS,
17 called as a witness, and having been first duly sworn
18 to tell the truth, the whole truth, and nothing but
19 the truth, was examined and testified as follows:

20 THE REPORTER: Thank you.

21 Ms. LaRoss, you may proceed when ready.

22 MS. LAROSS: Thank you.

23 This will be the deposition of Robert
24 Richards taken pursuant to notice and agreement of
25 counsel. The deposition will be taken by Defendant,

1 Secretary of State, Brad Raffensperger, and members of
2 the State Election Board for purposes of discovery and
3 all other purposes allowable under the Federal Rules
4 of Civil Procedure.

5 All objections, except those going to
6 the form of the question and responsiveness of the
7 answer, are reserved until trial or the first use of
8 the deposition if that's agreeable with counsel.

9 MR. JONES: It is.

10 MS. LAROSS: Thank you. And, Mike, how
11 do you and your client wish to handle signature of the
12 deposition?

13 MR. JONES: We would like to review and
14 sign.

15 MS. LAROSS: Okay. Thank you.

16 EXAMINATION

17 BY MS. LAROSS:

18 Q Mr. Richards, as I mentioned, my name is
19 Diane LaRoss, and I represent the defendants in the
20 lawsuit that we're here about today.

21 So in addition to some of the housekeeping
22 instructions that the court reporter already went over
23 with you, which are very helpful, I have just a couple
24 more to add.

25 It's important that, again, you and I not

1 speak at the same time. So I will do my level best to
2 not interrupt you. And if you could wait until I
3 complete my question until beginning your answer --
4 even if you know the answer of what that might be, if
5 you could just wait until I have finished, then that
6 will enable the court reporter to have a clear and
7 accurate transcript of everything that we say today.

8 So is that agreeable to you, Mr. Richards?

9 A Yes, it is.

10 Q Thank you. And also, we need to make sure
11 that we speak clearly and loudly, so that the court
12 reporter can take down everything that we say.

13 And I do want to let you know -- and -- if
14 at any time, you need to take a break, Mr. Richards,
15 that's entirely fine. Just let us know. I would
16 simply ask that if there's a question before you, that
17 you respond to the question and give you answer
18 completely before we take a break.

19 Is that also agreeable to you?

20 A Yes, it is.

21 Q Okay. Thank you. And we also ask that you
22 not have any electric -- sorry -- electronic devices
23 on during the deposition, such as your cell phone or
24 have your e-mail up. Okay. I can see that --

25 A I'll turn it off right now.

1 Q Thank you. I appreciate that. There won't
2 be any interference that way, and that's helpful.
3 Thank you. And certainly, if you need to take a call
4 at any point, just let us know. Again, that would be
5 fine. But now have you turned off your cell phone and
6 any other electronic devices or -- that you have with
7 you today?

8 A I have.

9 Q Okay. Thank you. And I would also ask that
10 you not have your e-mail up on your computer during
11 the deposition. Just simply that we be -- together.

12 Is that also agreeable?

13 THE REPORTER: Oh. I'm -- I'm sorry,
14 ma'am. Your audio got a bit garbled there. Can you
15 repeat that?

16 MS. LAROSS: Am I speaking too fast,
17 Dan?

18 THE REPORTER: You're not speaking too
19 fast. It's just the connection is all, ma'am.

20 MS. LAROSS: Okay. All righty. Okay.
21 I forgot what I said.

22 THE REPORTER: The beginning of what I
23 have is to not have your e-mail up.

24 MS. LAROSS: Okay. All right. Thank
25 you.

1 BY MS. LAROSS:

2 Q And so on the -- not having your e-mail up
3 on your computer, and that's agreeable to you, Mr.
4 Richards?

5 A It is.

6 Q Thank you. Thank you. And I also do want
7 to say that for -- it is not my purpose during the
8 deposition to confuse you. So that if there's any
9 question that I ask that you don't understand, can we
10 agree and -- can I count on you to let me know?

11 A Yes.

12 Q Okay. Thank you. And I understand that Mr.
13 Jones represents you today during your deposition. Is
14 there anyone there in the room with you where you're
15 located?

16 A No.

17 Q Mr. Richards, have you ever given a
18 deposition before?

19 A Yes.

20 Q How many times?

21 A The total number, I can't recount. More
22 than ten.

23 Q Okay. And are -- those depositions, are
24 they in connection with work or are they -- or what
25 are they in connection to?

1 A They were all in connection with work.

2 Q And what about your job that -- would
3 occasion you to have to give that number of
4 depositions?

5 A Law enforcement and federal government.

6 Q Okay. All right. And we'll get to your
7 employment in a bit.

8 So have you ever given a deposition in a
9 voting or election related matter?

10 A No, I have not.

11 Q Have you ever testified at trial?

12 A Yes.

13 Q And would that be connected with your
14 employment?

15 A Yes.

16 Q Have you ever testified in an election or
17 voting rights related trial?

18 A No, I have not.

19 Q Also, just so the record is clear, have you
20 taken any medications that may keep you from fully and
21 untruthfully participating in today's deposition?

22 A No, I have not.

23 Q And do you have any medical conditions that
24 would keep you from fully and truthfully participating
25 in today's deposition?

1 A No, I do not.

2 Q Thank you. Have you ever filed any lawsuits
3 before or been a party filing a lawsuit?

4 A Yes, I have.

5 Q And in what cases would that be?

6 A A action against Baltimore City related to
7 disparate treatment of African American officers.

8 Q And were you one of the named plaintiffs in
9 that case?

10 A Yes, I was.

11 Q And when was that matter filed, just
12 generally?

13 A 1999.

14 Q And how was that matter resolved?

15 A There was a -- as I recall, there was a
16 class action. The City Mayor and City Counsel agreed
17 to certain actions to resolve the matters.

18 Would you like me to go further?

19 Q That's okay. Was it resolved by settlement?

20 A Yes.

21 Q And in that matter, was it connected to
22 employment -- let me ask it this way.

23 Were you employed by the City of Baltimore
24 at the time that the action arose?

25 A I was.

1 Q And you've mentioned that the lawsuit
2 concerned disparate treatment. What in particular had
3 you claimed in that lawsuit against the City of
4 Baltimore?

5 A Fairness and equity and discipline.

6 Q And did you feel that you weren't --
7 sorry -- treated fairly in -- by the City of
8 Baltimore?

9 A This will require a two-part answer. All
10 right. The one -- the one is in reference to the
11 officers. There was specific evidence that
12 demonstrated that minority officers were given harsher
13 discipline than non-minority officers. I was a part
14 of that class action.

15 My individual action, which are two separate
16 cases around the same time, was regarding my treatment
17 as the first African American pilot to command the
18 aviation unit and the extent to which the City dealt
19 with me related to discipline, fairness, and equity.
20 Both were settled.

21 Q Okay. Both of those actions, were they
22 going on -- were they together or were they -- are
23 they two separate lawsuits?

24 A Two separate actions. They happened in
25 overlapping timelines. They didn't start at the same

1 time, but they had overlapping timelines.

2 Q And when did your individual lawsuit -- the
3 second one that you described, when was that one
4 filed?

5 A Hm. I think in 2000.

6 Q Okay.

7 A Actually, let me -- let me amend that. '96.
8 And then -- 1996, when I was a sergeant. That was
9 settled. Let me correct all that. 1996, when I was a
10 sergeant, I filed the lawsuit. And then in 2000, we
11 had to refile because they took additional actions.

12 Q And in that action that was filed originally
13 in 1996 and then refiled in 2000, were you the only
14 plaintiff in that litigation?

15 A In the individual suit, yes.

16 Q And the other lawsuit that you've spoken
17 about, the class action, did the class action arise
18 from your treatment as -- by the City of Baltimore --
19 similar claims to what you were making in your
20 individual lawsuit?

21 A No. The -- the one -- the class action for
22 the City was related to the data that was gathered by
23 the City's own community relations -- that was
24 confirmed by the Community Relations Commission for
25 the City of Baltimore and the Federal EEOC, regarding

1 the broader aspect of African Americans and the extent
2 to which their discipline -- when compared to
3 similarly situated non-minority officers, that it was
4 harsher. So it was in that context.

5 It wasn't just me, Louis Hopson, Shirley
6 Onyango [ph], John Mack -- a number of the people who
7 were named. But it was a broader perspective -- not
8 just on the individual, but the agency's own data.

9 Q Okay. And the class action, do you know
10 what court that was filed in?

11 A It was -- it was in federal court, but I do
12 not know -- I think it was Judge Nickerson at that
13 time, that saw -- for whatever reason, his name sticks
14 out in my mind. And I think he was Magistrate Judge
15 Nickerson at the time. I'm not sure, you know, of the
16 innerworkings of the federal court as it relates to
17 who reports to whom. But, yeah, that's -- that's as
18 much as I remember on that.

19 Q All right. And then the individual action
20 that you've also -- the other lawsuit that you've
21 spoken about, what court was that filed in?

22 A It was also in federal court and oddly
23 enough, Judge Nickerson again, as I recall.

24 Q In either action, did the judge make any
25 factual findings on the record, or was the matter

1 filed, and then it settled out of court?

2 A It was filed and settled out of court, as I
3 recall.

4 Q And were the settlements to your
5 satisfaction in both of those cases?

6 A My individual settlement was to my
7 satisfaction. I would say both were, given the
8 circumstances. Yes.

9 Q Have you been a party to any other lawsuits
10 other than the one we're here about today, and the two
11 that you've described thus far?

12 A I have not.

13 Q So then is it fair to say that the action
14 that we're here about today is the only election
15 related lawsuit that you've been a party to?

16 A Absolutely.

17 Q Okay. And, Mr. Richards, have you ever been
18 charged with a crime?

19 A No.

20 Q So then I would understand that you've never
21 been convicted of a crime.

22 A That's correct.

23 Q Okay. Have you discussed this case with
24 anyone other than your attorney?

25 A Not the case. Not where we are now. And as

1 I explained to the attorney -- and I -- I do want to
2 make sure that I'm clear, when this was brought to my
3 attention about the redistricting, I spoke with
4 Representative Wilkerson regarding my concern on it.
5 And he informed me about the actions that were being
6 taken relative to address it and whether or not I
7 wanted to be a party to it. And that's it. No -- no
8 one else.

9 Well, there was an article in the newspaper,
10 which I think we submitted as a part of either
11 interrogatory or the discovery. I can't remember
12 which at this point. And I submitted that. And --
13 and those were public statements that I made relative
14 to the redistricting.

15 Q And what newspaper did that article appear
16 in?

17 A Okay. So I do not remember, but it was
18 submitted.

19 Q Was it The Atlanta Journal, or would it have
20 been a local paper in Marietta --

21 A No. I want to say it's New York Times or --
22 I -- I cannot remember. It's like The New York Times
23 or one of those national publications.

24 Q And as you mentioned in that article, they
25 have -- the article includes statements made by you?

1 A Right. Statements relative to equitable
2 representation. Yes.

3 Q Okay. And what were the statements as best
4 as you can recall?

5 A Generally, that I did not believe that the
6 redistricting effort at that time would fully allow
7 for representation of the majority -- the majority of
8 the minority African American community, and that I
9 felt it was diluting our vote.

10 And my ancillary concerns around what would
11 then be our new representative -- around her
12 engagement or lack thereof with the minority
13 community, and the incendiary comments she had been
14 making up to that point, to me in my mind, stoking
15 racial division.

16 Q Do you recall any of the other statements
17 that you made to the newspaper?

18 A Not -- not without having to stretch my
19 memory, no. And I don't want to be inaccurate. But
20 the article --

21 Q I --

22 A But we -- but we submitted it, and it's
23 there in the record, I believe.

24 Q Okay. Thank you. Yeah. And my questioning
25 today is just based on your best memory, so that's

1 fine.

2 A Yep. Thank you.

3 Q Did you review anything to prepare for your
4 deposition today?

5 A I did. I reviewed the -- in part, the
6 complaint, not in detail, and the interrogatories.

7 Q And the interrogatories that you reviewed,
8 did those include your responses to those
9 interrogatories?

10 A So again, in brief, I reviewed it on my way
11 from my worksite to here, in the car. And so I just
12 skimmed through it, and I tried to look for anything
13 that may be relevant to what you may ask me today, as
14 a means to refresh my memory, which I didn't do that
15 good of a job at. But, yes, that was the extent. It
16 wasn't a deep dive or a comprehensive review of either
17 document.

18 Q Did you review anything else in preparation
19 for your deposition today?

20 A No.

21 Q And did you speak with anyone other than
22 your attorney? Let me just add this too, Mr.
23 Richards. Let me just add, too, that in response to
24 any of my questions, we -- I'm not looking for any
25 conversations or things that you have told or

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 Q How long have you lived in Cobb County?

2 A June 2016.

3 Q Okay. How long have you lived in the State
4 of Georgia?

5 A December 2006 -- yes.

6 Q In what county did you live in Georgia in
7 2006?

8 A Fulton. South Fulton to be exact.

9 Q While living in South Fulton in 2006, what
10 was your address then?

11 A I don't remember. Yeah. [REDACTED]
[REDACTED], Atlanta, Georgia [REDACTED] -- I think.
13 Don't get me -- don't -- don't hold me to the ZIP.

14 Q Okay. Thank you. And how long did you live
15 at that address?

16 A Until June 2016.

17 Q So you were at the South Fulton address for
18 about ten years; would that be correct?

19 A Roughly. Uh-huh.

20 Q What occasioned your move to Cobb County
21 from South Fulton?

22 A Schools.

23 Q And that would be schools for your children?

24 A For my child at that time -- my youngest.
25 The rest of them are out of school.

1 Q And what school in Cobb County did your
2 youngest child attend?

3 A Varner for elementary school. Tapp Middle
4 for middle. And then McEachern High School.

5 Q And then when you moved to Cobb County in
6 2016, that was to the [REDACTED] address; correct?

7 A That is correct. That is correct.

8 Q And that's the address where you live now;
9 correct?

10 A That is correct.

11 Q And is that a home? Is it in a subdivision?
12 What kind of -- describe your neighborhood for me, if
13 you would.

14 A Okay. A single-family, fairly large home.
15 They're all like 5,600 square feet. Fairly separate,
16 which is one of the draws to this particular
17 subdivision. So to answer your next point, it is a
18 subdivision. Sixty-eight homes. Mostly retired,
19 either law enforcement, military, some elected
20 official, to include Mr. Wilkerson. That's it.

21 Q Does your subdivision -- does -- is there a
22 name to your subdivision?

23 A It's [REDACTED]. [REDACTED]
24 [REDACTED]

25 Q You mentioned that in 2006, you -- was when

1 you first moved to Georgia. Where did you live before
2 then?

3 A In Maryland.

4 Q Have you lived in any states other than
5 Maryland and Georgia?

6 A Yes.

7 Q And what are those?

8 A Okay. I was in the military, so I moved
9 around a lot, so there are quite a few. I was a
10 aviation --

11 Q Okay.

12 A I was a pilot in the Army. So do you want
13 me to go through all of them?

14 Q I mean, I -- did you ever live overseas?

15 A No.

16 Q Okay. Yeah. If you could just give me the
17 states as best as you can.

18 A Okay. I'll work in reverse order. So
19 you've got Maryland. New York. Kansas. Alabama.
20 Virginia. And briefly in Texas, but I don't think
21 that technically counts.

22 Q Okay. All right. And was Maryland the
23 state where you lived the longest outside of Georgia?

24 A Well, I was an original resident of New
25 York, so, you know, I grew up in New York. So in

1 terms of living, I would say New York is probably the
2 longest. Yeah, I -- I would say Georgia is probably
3 the longest at this point.

4 Q Okay. So were you born in New York?

5 A No. I was born in the West Indies --
6 Jamaica, West Indies.

7 Q And then how old were you when you moved to
8 New York?

9 A Nine, ten, something like that.

10 Q And where did you live after New York? Was
11 that up in Kansas?

12 A No. Virginia after that.

13 Q Okay. And how old were you when you moved
14 from New York to Virginia?

15 A I was in the Army. I was 19 years old.

16 Q How long did you live in Virginia?

17 A From 1982 to 1985.

18 Q Where did you live next?

19 A Alabama. Specifically, Fort Rucker,
20 Alabama, where I went through flight training.

21 Q And then in 1985, where did you move to?

22 A Well, I actually moved in '86 because flight
23 training was a year-and-a-half long.

24 Q Okay. So --

25 A So '86 -- so '86 to '88 or '89 -- '89, I was

1 in Kansas. Manhattan, Kansas to be exact, assigned to
2 the First Infantry Division -- the Attack Helicopter
3 Brigade there. Actually, it's the Attack Helicopter
4 Battalion, not brigade.

5 Q And then after Kansas, where did you move
6 from there?

7 A Upstate New York. Technically, assigned to
8 the 10th Mountain Division -- the Air Calvary Unit
9 there in -- out of Watertown, New York. But we were
10 physically billeted in Griffiss Air Force Base, which
11 is -- has a physical address of Rome, New York. So I
12 was at Griffiss Air Force Base, but I was technically
13 assigned to Watertown.

14 Q And how did you -- sorry. Strike that.
15 How long did you live in New York at that
16 point?

17 A '89 to '91.

18 Q And then after that, where did you live?

19 A Maryland. From '91 to 2006 in Maryland.
20 September '91.

21 Q Do you own any property in Maryland?

22 A I do. I'm selling it today after this
23 deposition.

24 Q And what is that? Is that a home? Or what
25 kind of property is --

1 A It's -- it's a home.

2 Q And have you owned that home since the time
3 you moved from Maryland to Georgia?

4 A I have not. I bought it -- it's an
5 investment -- it -- well, not really an investment
6 property. It's a -- a in-law property, a family
7 property by way of my wife. We bought it, and now
8 we're selling it.

9 Q How long did you own that property?

10 A About two years now, I think -- something
11 like that.

12 Q Do you own any property in any state other
13 than Georgia, other than the home that you're selling
14 this afternoon?

15 A No, I do not.

16 Q I'm going to ask you some questions, Mr.
17 Richards, about your education. So how far did you
18 get in school?

19 A I have an MBA.

20 Q And what is your MBA in?

21 A Business administration. Strategic
22 management, to be specific.

23 Q And where did you receive your MBA from?

24 A Morgan State University in Maryland.

25 Q And when did you receive your MBA from

1 Morgan State?

2 A You said where or when?

3 Q I'm sorry. Yes. I said when.

4 A When. December 2006. And then I moved
5 here.

6 Q And what occasioned your move to Georgia?

7 A Family. I wanted to leave Maryland. New
8 opportunities. All of the above.

9 Q Do you still have family in Maryland?

10 A I do not.

11 Q And when you say new opportunities in
12 Georgia, just generally, what would that have been?

13 A Business. Work.

14 Q So did you move to Georgia for a job -- for
15 employment?

16 A I moved to Georgia for employment in a
17 general sense. I did not have a -- yeah, I moved to
18 Georgia for employment for -- in a general sense. My
19 family had a real estate business here. I moved here
20 to join the family, doing real estate.

21 Q And your family's real estate business,
22 where was that located?

23 A Oh. This was, honestly, all just really
24 independent stuff that we had been doing as just a
25 conglomeration of folks -- you know, identifying

1 opportunities in the real estate market. It was
2 short-lived for me because I went into the federal
3 government. But it was for a good year or so, I did
4 that.

5 Q Okay. I'm going to come back to some
6 questions about your employment. But I just wanted to
7 complete the -- my questions about your education.

8 A Okay.

9 Q You mentioned that you got your MBA from
10 Morgan State. Where did you complete your
11 undergraduate schooling?

12 A Embry-Riddle Aeronautical University, also
13 in Maryland. Through the satellite campus at Andrews
14 Air Force Base of Embry-Riddle.

15 Q Any other graduate education other than your
16 master's program?

17 A No.

18 Q And what degree did you receive from -- was
19 it Amber Little?

20 A No. Embry-Riddle. Oh, they would get you
21 for that. Embry-Riddle Aeronautical University. And
22 it's a degree in aeronautical science and a minor in
23 aviation safety.

24 Q Okay. Any other degrees besides your degree
25 from Embry-Riddle and the -- Morgan State?

1 A No.

2 Q Have you had any other training or licensing
3 or certifications other than what you've described to
4 us thus far?

5 A Yes.

6 Q And I guess, how about we start with --
7 other than your -- the trainings and certifications
8 you've received connected to being a pilot. Anything
9 else outside of that?

10 A Yes. I received a number of certifications
11 in federal contracting. I was the director of
12 contracting for Region 4 for the U.S. Department of
13 Labor -- Region 4, and there are a host of
14 certifications that were required for that.

15 Q Any other categories like that -- like
16 federal contracting or -- other than your training as
17 a pilot?

18 A Yes. I'm also what's called a delegated
19 examining unit, certified professional as a federal
20 senior executive and human resources from -- by OPM,
21 Office of Personnel Management.

22 Q And when did you receive that certification?

23 A Earlier last year. A ballpark, I'd say
24 February of last year, something like that.

25 Q Any other certifications or licensing?

1 A Not relevant -- well, not outside of what
2 you -- the broad spectrum of aviation that you
3 outlined.

4 Q Okay. Have you ever had any training in
5 elections or election administration?

6 A No.

7 Q So now I'll turn to talking with you about
8 your employment. We've touched on it periodically
9 thus far in your deposition, but I'm going to ask you
10 some specific questions about that.

11 Mr. Richards, are you currently employed?

12 A I am.

13 Q And where are you employed?

14 A I'm a federal senior executive with the
15 Internal Revenue Service. I'm the director of
16 collection.

17 Q And how long have you held that position?

18 A As the director of collection, about two
19 years. And specifically, I'm the director for
20 collections -- Campus Collections-Atlanta. And I've
21 been there -- I've been here for about two years.

22 Q So is your office in Atlanta, or is it local
23 --

24 A No. My office is -- no. My office is -- is
25 in Atlanta. It's the campus in Atlanta. And of

1 course, I cover multiple states, not just Atlanta.

2 Q How long have you worked for the Internal
3 Revenue Service?

4 A Since June 2015.

5 Q And then before June 2015, where did you
6 work?

7 A The Federal Aviation Administration,
8 briefly, in D.C.

9 Q And while you were working for the Federal
10 Aviation Administration, were you residing here in
11 Georgia at that point or did you --

12 A No. I was in -- I was -- I was --

13 THE REPORTER: I'm sorry, sir. I'm
14 sorry, sir.

15 And, ma'am, can you repeat the
16 question?

17 MS. LAROSS: Yes.

18 BY MS. LAROSS:

19 Q Mr. Richards, while you were working for the
20 Federal Aviation Administration in D.C., did you
21 reside in Georgia?

22 A Okay. No. I was in Virginia -- Crystal
23 City, Virginia.

24 Q And what was the time period that you were
25 residing in Crystal City, Virginia?

1 A September 2014 to June 2015, when I went to
2 the IRS.

3 Q When did you first move to Georgia?

4 A I was --

5 MR. JONES: Objection. Asked and
6 answered.

7 MS. LAROSS: Sure. I think I've got
8 some dates here confused.

9 BY MS. LAROSS:

10 Q So did you move to -- did you say that you
11 moved to Georgia in 2006?

12 A That's correct.

13 Q Okay. So then in 2006, did you reside in
14 Georgia up until the time that you moved in September
15 2014 to Washington, D.C.?

16 A I resided --

17 Q Or sorry. To Crystal --

18 THE REPORTER: I'm sorry. To Crystal?

19 MS. LAROSS: Crystal City, Virginia.

20 THE WITNESS: So I resided in Georgia
21 and in Virginia. My family was here -- held a house
22 here. I moved to D.C. because the job physically
23 required me to be in D.C., which is often the case in
24 federal government.

25 //

1 BY MS. LAROSS:

2 Q So while you were residing in Crystal City,
3 Virginia, your family lived at that [REDACTED]
4 address in Powder Springs?

5 A No, because remember, I moved to [REDACTED]
6 [REDACTED] in 2016.

7 Q Oh, got it. Okay. So at that point, they
8 were living in South Fulton?

9 A That's correct.

10 Q Has there been any other time when you have
11 lived in a different place from your family? As
12 you've described, some -- it happens in federal
13 government sometimes.

14 A Yeah. When you're in -- when you're in the
15 Army, as you know, your family will be in one place,
16 and you'll be in another place. So that happened at
17 varying times. My family lived in New York, but I may
18 have been physically deployed to Kansas.

19 Q Okay. Let's talk about when you moved to
20 Georgia in 2006. And I think you mentioned that that
21 move was occasioned by -- at least in part, by
22 employment opportunities.

23 Where did you work -- what was your first
24 job when you moved to Georgia?

25 A Basically, an entrepreneurship in real

1 estate. So the primary place was from home, working
2 with family and friends, looking at real estate deals
3 that were available in the market at that time, buying
4 homes, flipping them -- those things.

5 Q So you're saying that you were buying homes
6 in the market. Where was the market located? Was it
7 just in the Atlanta area, only in South Fulton? Or
8 where were the homes located that were involved in
9 your real estate practice?

10 A Kind of the metro -- Atlanta Metro area.

11 Q And what counties would that have been in?

12 A Fulton County. The City of Atlanta, of
13 course -- which of course, as you know, is inside
14 Fulton County.

15 Q Any in DeKalb or Cobb or any of the other
16 metro counties?

17 A Nothing in Cobb. I think there was one on
18 the outskirts of the city, but I still think it was
19 still Fulton County, not in another county.

20 MS. LAROSS: Excuse me. Can you guys
21 hear me?

22 THE REPORTER: Yes, ma'am.

23 THE WITNESS: Yes.

24 MS. LAROSS: Okay. Great. My phone
25 was doing something really weird there. Okay. Great.

1 BY MS. LAROSS:

2 Q How long did you work in real estate in the
3 family business that you described?

4 A From December to when I was hired the
5 following May, by the Department of Labor. So it was
6 short-lived, as I previously mentioned.

7 Q And if you would, remind me of what year you
8 were hired by the Department of Labor.

9 A So it was -- so it was like May 2007.

10 Q After you were hired by the Department of
11 Labor in 2007, did you continue working in the real
12 estate business?

13 A No --

14 Q That you've described.

15 A Not -- no. I sold my properties --
16 properties that I may have had. But, no, I did not
17 work in the real estate business.

18 Q And in May of 2007, what was your job for
19 the Department of Labor?

20 A It's a weird title. It's called regional
21 administrative services officer or RASO, R-A-S-O. And
22 do you want me to explain the job or?

23 Q Yeah, just generally --

24 A Okay.

25 Q That would be --

1 A I was the -- I was the division chief for
2 administrative services for the region. Contracting,
3 space, telecommunication, continuity of operation.

4 Q And how long did you work for the Department
5 of Labor?

6 A Up to 2014, when I went to the FAA. I
7 worked in different capacities. As you know, in
8 federal government, you move around. So I worked for
9 the Department of Labor in the aggregate, up until
10 September 2014, but in varying capacities.

11 Q And just generally speaking, what were the
12 capacities that you worked for the Department of Labor
13 from 2007 to 2014, other than what you've described?

14 A The only other job I had was as a
15 director -- a director of administration for the
16 Office of Foreign Labor Certification.

17 Q Any other positions with the Department of
18 Labor?

19 A No.

20 Q While you were working at the Department of
21 Labor, was your office in Downtown Atlanta, or where
22 was the office located?

23 A It was in Downtown Atlanta.

24 Q And in that job -- or in the work that you
25 did for the Department of Labor, did you have occasion

1 to travel outside of the State of Georgia, or were you
2 pretty much based in Georgia?

3 A I was pretty much based in Georgia.

4 Q In 2014, when you left the Department of
5 Labor, where did you go to work?

6 A The FAA in D.C.

7 Q And was that for the period of time that you
8 lived in Crystal City?

9 A That is correct.

10 Q And you may have mentioned it --

11 MS. LAROSS: Can you guys see me?

12 THE WITNESS: Yes, we can --

13 MS. LAROSS: Has my video --

14 THE WITNESS: I was -- I was going to
15 tell you that we can still see you because I see that
16 confused look on your face.

17 MS. LAROSS: Okay. We're going to need
18 to go off the record just for a moment because the
19 video on my computer has turned off. So if we could
20 go off the record for a moment -- if that's all right
21 with everyone.

22 THE REPORTER: We are off the record.

23 The time is 2:02 p.m.

24 (Off the record.)

25 THE REPORTER: We are back on the

1 record. The time is 2:03 p.m.

2 You may proceed when ready, Counsel.

3 BY MS. LAROSS:

4 Q Mr. Richards, I think we were talking about
5 your work for the FAA in 2014. Just generally
6 speaking, what was it that you did for the FAA at that
7 time?

8 A I had two functions. I was -- I can't even
9 remember the -- the title of the first one. I just
10 remember the second one -- the primary one, which was
11 the deputy director for Compensation, Benefits, and
12 Worklife for the FAA. The deputy director, I should
13 say. The deputy director for Compensation, Benefits,
14 and Worklife.

15 Q And did you hold that position for the
16 duration of your work with the FAA in Crystal City?

17 A That's correct. Until I went to the IRS in
18 2015.

19 Q And working for the IRS, is -- I may have
20 asked you this before, so forgive me if I have. Is
21 that a job where you work at their office or how -- or
22 do you work from home?

23 A So we teleworked -- teleworked less then.
24 We certainly do it a lot now. So you work in their
25 office, but you could be remote. And there were times

1 during my initial transition, that I was there
2 physically in D.C. And of course, now I'm here in
3 Georgia, and I've served in multiple roles.

4 Q So how long were you transitionally in D.C.
5 while working for the IRS?

6 A Through senior executive training, which is,
7 I think, June to November, something like that --
8 2015. I could be off by -- you know, but it's like,
9 June to November of that year -- of 2015.

10 Q And after your executive training, were you
11 working out of D.C. again, and have you worked out of
12 Atlanta --

13 A Out of Atlanta after that.

14 Q Do you currently have any other employment
15 other than your work with the IRS?

16 A I do not.

17 Q Do you own any properties in Georgia?

18 A Other than --

19 MR. JONES: Objection. Asked and
20 answered.

21 MS. LAROSS: Okay. So are you going to
22 instruct him not to answer?

23 MR. JONES: I didn't say that.

24 Robert, you can go ahead and answer if
25 you'd like.

1 THE WITNESS: Okay. Other than -- just
2 for point of clarification, other than the property
3 that I'm living in, no.

4 BY MS. LAROSS:

5 Q Are you currently registered to vote in
6 Georgia?

7 A I am.

8 Q And when did you first register to vote in
9 Georgia?

10 A I would expect 2007. Because I got here in
11 2006 -- December 2006, so I'm pretty sure it was 2007.

12 Q Before moving to Georgia, did you vote in
13 any other state?

14 A Yes, in Maryland when I lived in Maryland.

15 Q Have you voted in any other state other than
16 Maryland and Georgia?

17 A In New York when I lived in New York. But
18 again, I was in the military, remember? So I would
19 vote absentee because I was moving around.

20 Q So other than Maryland, New York, and
21 Georgia, have you voted anywhere else?

22 A I have not.

23 Q Are you currently registered to vote at your
24 current address?

25 A Yes.

1 Q In what congressional district did you
2 reside in before the recent redistricting took effect?

3 A So -- so to be honest with you, I don't
4 remember the district number. I do not.

5 Q Do you remember who your representative was?

6 A Oh, God. I knew you were going to ask me
7 that. I just know his face. I'm old, and I can't --
8 I can't remember his name. I -- I mean, I can see
9 him, but I cannot remember his name.

10 Q How about just in general -- and I won't
11 hold you to this, but just describe him for me. It
12 was a male.

13 A Yeah, African American male, gray hair on
14 the side.

15 Q Okay.

16 A Awesome talker. Was there for my interests
17 and my concerns. And I -- I know he would be upset
18 with me because I cannot remember his name. When
19 you're 59, you'll -- you'll know what I'm talking
20 about.

21 Q Is it David Scott?

22 A There you go. David.

23 Q I will not tell him that you didn't remember
24 --

25 A Yeah, please don't -- don't. Yes. Thank

1 you.

2 Q And now you reside in District 14; is that
3 correct?

4 A The -- yes. The redrawn district, District
5 14, under Ms. Greene.

6 Q Looking back on all of your voting while in
7 Georgia, have you voted in each election since you
8 registered -- first registered to vote in Georgia?

9 A Every election. That's correct.

10 Q So how about -- have you voted in every
11 Presidential Preference Primary?

12 A Yes.

13 Q And have you voted in all other local or
14 other primaries in the State of Georgia?

15 A I have.

16 Q Have you voted in every general election in
17 Georgia since you have -- since you were -- registered
18 to vote?

19 A I have.

20 Q Have you voted in all special elections in
21 Georgia since you registered to vote?

22 A Yes, I have.

23 Q What precinct did you vote in for the
24 November 2022 election?

25 A I always early vote, so different locations.

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?

1 A I think from the time I could vote from when
2 I was in the military -- when I turned 18.

3 Q Have you ever held any leadership positions
4 in the Democratic Party?

5 A No.

6 Q Have you ever served on any committees
7 for -- in the party?

8 A No.

9 Q Have you participated in any activities of
10 the Democratic Party?

11 A No. I'm forbidden under the -- yeah, I'm
12 forbidden.

13 Q And why are you forbidden?

14 A Federal law prohibits --

15 Q Is it --

16 A Yeah. Federal law prohibits me from being
17 active.

18 Q So have you been prohibited by law to --
19 from participating in activities of the Democratic
20 Party since the time you moved to Georgia?

21 A Not for the period that I was not employed
22 by the federal government because the Hatch Act
23 wouldn't apply to me as a regular citizen. So --

24 Q Sure. So if that was -- excuse me. I
25 didn't mean to interrupt you. Go ahead.

1 A That's okay. Did you want to clarify your
2 question to me or -- I just wanted to make sure that
3 I'm answering the question that you're asking.

4 Q Okay. Very good. So for the time period
5 that -- before you worked for the federal government
6 while you were living here in Georgia, did you
7 participate in activities or hold any leadership
8 position with the Democratic Party?

9 A No. I had to -- the specific provision
10 under the Hatch Act would stop me from doing that, and
11 certainly, I would not have done that and did not do
12 that.

13 Q Okay. Actually, I did not ask my question
14 well, so let me ask you the -- so I understand that
15 when you first moved to Georgia, that you worked in
16 your family's real estate business; is that correct?

17 A Correct. Yes.

18 Q So during that -- before you -- I think your
19 first job was with the Department of Labor?

20 A That's correct.

21 Q So before you worked for the Department of
22 Labor and during the time that you were working in the
23 family's real estate business, did you participate in
24 any activities or hold any leadership position in the
25 Democratic Party?

1 A No.

2 Q Have you ever considered yourself to be a
3 member of the Republican Party?

4 A No.

5 Q Have you ever considered yourself to be a
6 member of any other party other than the Republican
7 Party or the Democratic Party?

8 A When you say consider, I just want to
9 make -- meaning what I've thought in my mind or
10 physically registered?

11 Q Yeah. Well, let's ask first what you
12 thought in your mind.

13 A Years ago, when I was in the military, I
14 considered myself more of an Independent, but the
15 Democratic Party had the candidates, to me, that were
16 electable and most stood for my values. That was
17 until -- it crystallized as I moved further in life.

18 Q Have you ever voted for a Republican?

19 A Once.

20 Q And who was that?

21 A Bob Earle [ph].

22 Q Have you ever voted for a Republican while
23 living in the State of Georgia?

24 A No.

25 Q And I understand that federal prohibition

1 that you've described to us concerning political
2 parties. But I do want to ask you if you've ever
3 worked on any political campaign.

4 A No.

5 Q You mentioned earlier in your testimony that
6 you first heard about this lawsuit, I think, from your
7 state representative; is that correct?

8 A No, that's not correct. I didn't hear about
9 the lawsuit.

10 Q Okay.

11 A The redistricting is what I heard about.
12 And then I reached out regarding my concerns around
13 representation, equity, and all of the things that I
14 mentioned earlier.

15 Q And so you -- sorry. Strike that.

16 Who did you reach out to?

17 A David Wilkerson. And he's our elected
18 representative for this district at the state level.

19 Q And it was Representative Wilkerson that --
20 was he the one that informed you about the lawsuit?

21 A He informed me that the Eric Holder group
22 would be looking at moving forward in a litigation if
23 they were unsuccessful in the state legislature to be
24 able to dissuade the majority of the Republican Party
25 from wholesale ignoring the community's concern and

1 moving forward with the -- the redistricting, which of
2 course, they did.

3 Q What made you decide to sue the Secretary of
4 State?

5 A For the reasons I just mentioned. One, I
6 believe it was a disenfranchising of my community,
7 diluting my vote, as I said to Representative
8 Wilkerson. And just on its face, the unwillingness of
9 the state legislature to even engage the minority
10 Democratic Party in what I would have liked to have
11 been a -- a more robust community outreach to ensure
12 fair representation -- that we could select who we
13 believe would represent our interests more.

14 Q And what are you hoping the lawsuit will
15 accomplish?

16 A One, restoring the -- the nature of our vote
17 as a majority/minority community, and ultimately
18 having a representative that is in keeping with our
19 values and, quite frankly, our interests.

20 Q Who was the first lawyer that you contacted
21 about this lawsuit?

22 A I don't remember. It was not Michael, I
23 don't think. I honestly don't remember. I spoke to a
24 gentleman and then a young lady. And I think -- yeah,
25 I don't remember because if I -- yeah. I don't want

1 to conflict things. I -- I don't remember. But I
2 know it wasn't Michael. It was -- Michael wasn't the
3 first one.

4 Q Did you understand that whoever you spoke
5 with other than Michael, that those lawyers were a
6 part of Michael's law firm?

7 A As I understood it, there were multiple law
8 firms working -- working in concert with each other
9 under the broader banner of the Eric Holder group.
10 And as we've talked about, I -- I have experienced
11 this before, so I understood that there are
12 partnerships that are gained in the process of that.

13 The law firm, itself, wasn't the issue. I
14 mean, I -- when I signed the waivers, I made sure,
15 okay, this looks right, and -- and that's it -- the
16 agreements and ...

17 Q And so you signed a fee contract with your
18 attorney?

19 A I don't believe -- if that's the legal term.
20 I just knew that I wasn't going to be billed and --
21 and that my interest was going to be represented and
22 that it was under a larger umbrella. I'm -- I'm --
23 that's how I think, you know. I didn't get into all
24 the details of that part --

25 Q Okay. So you have not personally paid your

1 attorney; is that right?

2 A I have -- I have not personally paid the
3 attorneys, no.

4 Q How have your attorneys been paid, if at
5 all?

6 A I -- I'm presuming through the Holder group,
7 but Michael and his team could probably answer --
8 provide the information on that, for Mike and his
9 team.

10 Q Have you been paid or received anything of
11 value in exchange for your participation as a
12 plaintiff in this litigation?

13 A Absolutely not.

14 MS. LAROSS: Mike, I'm going to go to a
15 new topic. We've been at it for almost an hour and a
16 half. So if this is a good time to take a break, we
17 can do that. Or if you want me to keep going, I can
18 do that as well.

19 MR. JONES: I'll defer to you, Robert.
20 How do you feel?

21 THE WITNESS: Let's keep moving.

22 BY MS. LAROSS:

23 Q Mr. Richards, during the 2021 Special
24 Session of the Georgia legislature, did you reach out
25 to any legislator concerning redistricting issues that

1 are raised in the complaint that is part of the
2 lawsuit that we're here about today?

3 A Other than what I've mentioned before about
4 me reaching out to Mr. Wilkerson through the public
5 information that I saw on the news, no.

6 Q Did you testify in the Georgia Assembly on
7 any issues, at any hearings?

8 A No.

9 Q Concerning --

10 THE REPORTER: I'm sorry. Concerning?

11 MS. LAROSS: Redistricting.

12 THE WITNESS: And the answer was no.

13 BY MS. LAROSS:

14 Q Did you attend any hearings in the Georgia
15 legislature pertaining to redistricting?

16 A I did not.

17 Q Did you attend any other meetings concerning
18 redistricting in 2021?

19 A I didn't attend the meeting. I viewed them
20 online.

21 Q And what were those meetings that you viewed
22 online?

23 A Just what -- just what I saw on the news, I
24 should say -- online.

25 Q Okay. So it wasn't a meeting that you were

1 attending remotely --

2 A No. No. No.

3 THE REPORTER: My apologies, Counsel.

4 MS. LAROSS: There --

5 THE REPORTER: Mr. Richards, if you
6 could wait one extra second before you answer, that
7 way, I get a clear question on the record as well.
8 Thank you, sir.

9 THE WITNESS: You -- you got it. Sorry
10 about that.

11 BY MS. LAROSS:

12 Q And I'm not asking you for a legal
13 conclusion. I know that you're not a lawyer. Have
14 you ever heard of the term, community of interest?

15 A No.

16 Q Describe your community. If someone asked
17 you, what is your community, what would your response
18 be?

19 MR. JONES: Objection. Vague.
20 Objection. Compound question.

21 You may answer.

22 THE WITNESS: Okay. My community is
23 predominantly -- as I mentioned earlier, a
24 predominantly African American community.
25 Professionals. Family. Shared values. Shared

1 interests.

2 BY MS. LAROSS:

3 Q And where would you say that you are from?

4 A I don't understand what you mean. Origin?
5 Where I was born? Where -- where I currently live?
6 What ...

7 Q Currently. If someone asked you where you
8 were from, what would you say?

9 A Powder Springs, Cobb County.

10 Q Do you participate in any neighborhood or
11 community association?

12 A I do.

13 Q And what are those?

14 A Our POA, Property Owners' Association. I
15 was on the board, and I'm still active in the
16 community association. Prior to this deposition, I
17 was at a zoning/planning workgroup or focus group. So
18 I'm involved in those things that impact the community
19 and community interests.

20 Q You mentioned that you were on the board.
21 Is that your neighborhood board?

22 A That is correct.

23 Q And that's like a homeowners' association?

24 A Right. Yes, it is.

25 Q I think you mentioned it was an IPOA?

1 A It's a POA, Property Owners -- there's a
2 difference in what you can do within the community.
3 It's an HOA; just an HOA with additional authority.

4 Q How long have you served on the board of
5 that association?

6 A Past tense, one-and-a-half term.

7 Q And when was that?

8 A 2017 to late 2018, I believe.

9 Q And you referred to a community association.
10 Were you referring to the POA, or were you referring
11 to another association?

12 A I was referring to the POA.

13 Q And since the time that you've served on the
14 board of the POA, have you participated in any way
15 with the board since then?

16 A I -- I support the board. I take on
17 different projects and initiatives for the board. The
18 board will consult with me and other past members on
19 legacy issues. And given our varying experiences
20 within our professional world, anything that we can
21 leverage from our professional world to assist the
22 community, in terms of insights, points of contact,
23 and those kind of things.

24 Q And you mentioned that you attended a
25 zoning/planning workgroup earlier today. Do I have

1 that correct?

2 A That's correct. That is correct.

3 Q Okay. The zoning/planning workgroup, is
4 that part of the POA, or is that connected to the City
5 somehow, or who is that related to?

6 A It's connected to Cobb County government.

7 Q So with Cobb County government, what group
8 do you participate with?

9 A Well, it's -- it's not a group. So those of
10 us who -- so as a part of the POA, right, when
11 developers come into the community and want to develop
12 in -- especially in our area of Cobb County, the
13 standing practice is that they reach out to their
14 varying boards that are there.

15 And those of us who are able to articulate
16 the community's concern then engage with both the
17 developers, as well as our elected official, in this
18 case, Lisa Cupid, who is now the board chair, and our
19 current representative, Monique Sheffield. And as a
20 result, they know that we're activists in those things
21 that impact community quality of life.

22 And in this case, she reached out to me,
23 saying hey, there's a -- a UDC, where they're trying
24 to unify our code for zoning to make it more clear,
25 more transparent, more user friendly. And she said,

1 hey, Robert, would you like to participate in this
2 focus group? And I said yes, and I was there.

3 Q Is it fair to say that you continue to work
4 in your community association since the time you
5 served on the board?

6 A I don't work in it. I -- I'm like every
7 other -- other homeowner, right, where we stay active,
8 and we try to support the board because again, it's in
9 our interest to stay active because we want the board
10 to reflect what the community's concerns are. So we
11 stay active in that context.

12 Q Okay. So you stayed active with the work of
13 the board since the time you served on the board then.

14 A Right. Wherever I can. Wherever I can. If
15 they call on me, I'm there. I attend the meetings. I
16 voice my concerns, where I can provide some support
17 for the board by doing varying initiatives because,
18 you know, we all still volunteer to help out on
19 different subgroups. That -- that -- it's in that
20 context, yes.

21 Q And are -- your activities that you take
22 part in with relationship to the POA, are those -- let
23 me start over. Let me strike that.

24 You've described for us, your participation
25 with the board. Other than those activities, have you

1 done anything else or participated in any other way in
2 connection with the POA?

3 A No.

4 Q Are you a member of any faith-based group or
5 organization?

6 A No.

7 Q Are you a member of any school associations?

8 A No.

9 Q Do you participate in activities at your
10 daughter's middle school?

11 A When you say activities, she does piano, she
12 does viola. I go to those. Other than that, I don't
13 have the time to do any of those other things.

14 Q Okay. So you're not a coach or a volunteer
15 for --

16 A No. I have no time. No. No.

17 Q All right. How about any other civic
18 organizations other than what you've described -- do
19 you participate in any civic organizations?

20 A I do not.

21 Q And outside of work and the work that you've
22 described in your POA, where do you spend most of your
23 time?

24 MR. JONES: Objection. Vague.

25 You can answer.

1 THE WITNESS: Okay. Are you talking
2 recreation or?

3 BY MS. LAROSS:

4 Q Anything else. Well, let's start with
5 recreation. That's a good place to start.

6 A Okay. I'm an avid shooter. I've got a
7 absurd amount of firearms. I -- so I go to the range
8 a lot. I'm an exotic car owner. I own -- so I go to
9 exotic car shows. I mean, is that -- is that what
10 you're asking?

11 Q Yeah. And the range that you're talking
12 about -- where you go, is that in Powder Springs, or
13 is that in Atlanta?

14 A No. It's -- it's Cobb County, Powder
15 Springs and -- and dual members -- the range has two
16 locations. The Governors Gun Club. So there's one in
17 Powder Springs, and there's one in Kennesaw, and I go
18 to both.

19 Q And you mentioned that you're an exotic car
20 owner. And where --

21 A Seriously? Okay.

22 Q Does it take you all places, or is that --

23 A It does. It does. It does. We -- you
24 know, we -- we use the car to support charities, Toys
25 for Tots. They're fairly high-end cars, fairly unique

1 cars, so we're the draw. And we don't charge the
2 charities for our appearance. But we go there and we
3 draw in crowds, and those crowds then contribute to
4 see our cars.

5 Q Okay. So you bring the cars for -- to
6 events for Toys for Tots --

7 A Well, varying charities. That's not the
8 only one. I mean, there are --

9 THE WITNESS: I'm sorry. I -- I cut
10 her off. Forgive me, Dan.

11 Let me know when you're ready for me to
12 answer. My apologies.

13 THE REPORTER: You can answer, sir.

14 THE WITNESS: Okay. Yeah. We take the
15 cars to the varying charities, not just Toys for Tots.
16 I did one for VFW. So we deal with the varying
17 charities, a lot -- a lot of law enforcement ones.

18 We're -- in both Powder Springs -- we
19 even go outside of our jurisdiction -- our local
20 community, to Cumming, Georgia -- varying places,
21 where we believe that the cars can help those local
22 charities raise more money. Or winners to a cause
23 because we did a bull run for men's health and cancer
24 awareness. So we just did a bull run for that.

25 //

1 BY MS. LAROSS:

2 Q Any other kinds of activities?

3 A No --

4 MR. JONES: Objection. Relevance.

5 You may answer.

6 THE WITNESS: I'm sorry.

7 MR. JONES: You can answer.

8 THE WITNESS: No.

9 BY MS. LAROSS:

10 Q Do you belong to a fraternity?

11 MR. JONES: Objection. Relevance.

12 You may answer.

13 THE WITNESS: Okay. I'm a member of
14 the Prince Hall Masons. I'm not sure if you know what
15 that is, but -- so that's --

16 BY MS. LAROSS:

17 Q I --

18 A Yep --

19 Q Yeah, I actually --

20 THE REPORTER: I'm sorry. Ma'am?

21 BY MS. LAROSS:

22 Q I actually do not know what that is, Mr.
23 Richards, so if you could let us know.

24 A All right. So it's a Masonic order. Do you
25 know what a Freemason -- I'm a Freemason.

1 Q Okay.

2 A And I'm a life member of the NAACP. I just
3 -- I just looked at my wall and saw it up there, so
4 ...

5 Q How long have you been a member of the
6 NAACP?

7 A Since 1996 when I was on the Fraternal Order
8 of Police Board. I became a life member back then.

9 Q And you've continued your membership since
10 then?

11 A It's a life membership. I -- I have not
12 actively participated. It's a life membership. I
13 literally just looked on my wall, and I see it up
14 there.

15 Q So have you participated in any
16 activities -- NAACP?

17 A Not since probably 2000.

18 Q Are you a member of any voter advocacy
19 groups?

20 A No.

21 Q Have you ever been prohibited from
22 registering to vote based on your race?

23 A Prohibited, no.

24 Q Have you ever been prohibited from
25 participating in the political process based on your

1 race?

2 A Okay. The -- the word, prohibited, is -- is
3 the key that I'm -- that I'm responding to. And I
4 have not been prohibited under those circumstances
5 either, no.

6 Q Do you have any personal knowledge of
7 discrimination by the Government of Georgia against
8 members of a minority group related to participation
9 in the Democratic process?

10 A Any personal knowledge?

11 Q Yes.

12 A Of discrimination, no, not -- not of
13 discrimination.

14 Q In your opinion, to Black voters in Georgia
15 generally vote for Democratic candidates?

16 MR. JONES: Objection. Calls for
17 speculation.

18 You may answer.

19 BY MS. LAROSS:

20 Q And this is just in your own personal
21 knowledge, Mr. Richards.

22 A I'd say generally, yes.

23 Q Do you know if Georgia uses a majority vote
24 requirement in its elections?

25 A I do not know.

1 Q Are you familiar with the term, candidate
2 slating?

3 A Candidate what?

4 Q Slating.

5 A Slating?

6 Q Yes.

7 A No.

8 Q In your opinion, does the lack of education
9 keep people of color from participating in Georgia
10 politics?

11 A Lack of education by the candidate or lack
12 of education about themselves -- where they've been
13 academically?

14 Q The latter, lack of -- yes, their -- lack of
15 their own education.

16 A I don't know about Georgia. But I know in
17 the general sense, that can impact a person, yes. But
18 as it relates to Georgia, no, I don't have any
19 specific example or specific knowledge.

20 Q Do you believe a lack of employment
21 opportunities keep people of color from participating
22 in Georgia politics?

23 A I would -- do I believe? That's the
24 question; right? Do I believe?

25 Q Yes.

1 A Yes, I do believe that.

2 Q And do you have any personal experience of
3 that?

4 A No, I do not. None personally.

5 Q And what is your belief based on?

6 A In the context of if -- if you have to work
7 or if you're trying to find work, it impacts your
8 ability to get to where you can vote. And quite
9 frankly, having the time to vote.

10 And just as a real world issue, if you -- if
11 -- if you don't have employment and you're trying to
12 put food on your table, I'm -- I'm not sure that some
13 would view voting as their number one priority.
14 They're going to focus on trying to put food on the
15 table.

16 Q In your opinion, does lack of access to
17 health services keep people of color from
18 participating in Georgia politics?

19 A In my opinion and for all the reasons that I
20 just previously stated, yes.

21 Q And do you have any personal experience of
22 lack of access to health services keeping you from
23 participating in Georgia politics?

24 A In my personal -- in my personal experience,
25 no.

1 Q Do you know of anyone that has been
2 prevented from participating in Georgia politics
3 because of a lack of access to health services?

4 A Not that I know of.

5 Q Are you familiar with the term, racial
6 appeal, when used in the context --

7 A Yes.

8 Q -- of an election?

9 A I'm vaguely familiar with it.

10 Q Have you personally seen campaigns in
11 Georgia characterized by racial appeals?

12 A Yes.

13 Q And what are those appeals?

14 A So with -- with Ms. Greene's previous
15 campaign, that, to me -- in drawing on perceived
16 differences among race, that has been the strong -- or
17 has been the -- the central issue that I kind of
18 articulated earlier. The divisive nature of her
19 campaign to make it look like, based on an individual
20 race, there's a difference in who should vote for who
21 -- and in the context of stoking fear and division.

22 Q What is it about her ads that have you
23 conclude -- or characterize it as a racial appeal?

24 A The terminology -- if you -- if you see some
25 of the broadcasts, not just of her ads per se, but

1 even when they cover her campaign stops, the use of
2 the term, those people, they are not patriots -- and I
3 have to make sure that I -- yeah. They're not
4 patriots. The whole host of terms that are no longer
5 even dog whistles.

6 She's almost saying the White part out loud,
7 regarding some of the age-old division that people
8 have stoked in the past, among race. I would say that
9 it is -- it is very clear to those of us in our
10 communities that she's just using race as a
11 leverage -- and the race of the varying people in the
12 community as a leverage, to -- to her benefit.

13 Q So do you mean that she's using the race of
14 her community? Do you mean the White race?

15 A That is -- that's correct. The more -- the
16 more you listen to her, the more it's -- without
17 saying it directly, it's more of that's them, I'm with
18 you. And the appeal that she has tried to play to on,
19 again, racial division, even my community --

20 Q I'm --

21 A It's okay. Even -- even my community's
22 interests versus the interests where you'd see in
23 Rome, for example. Completely different. Almost as
24 if, you know, that group of people or that race is not
25 patriotic like we are up here in Rome.

1 Q Any other racial appeals in Georgia
2 campaigns?

3 A Well, you know, my perspective is -- is
4 different. But I even think the -- the race between
5 Mr. Warnock and -- and Walker has a racial component
6 even though they're both African American. So I still
7 see that happening there too. But the primary is Ms.
8 -- Ms. Greene. That's my primary focus at this point.

9 Q Do you know how many Black people have run
10 for office in Georgia?

11 A Local or -- I -- I mean, I would only know
12 the ones that impact me. Right? So, you know, the
13 local election and the state elections are the two --
14 and of course -- of course, Ms. -- Ms. Abrams who ran
15 for the -- the governorship. So both the Governor,
16 the Senate, and for this district.

17 Q Okay. So do you know how many Black people
18 have run for office in Georgia?

19 A I wouldn't know an exact number. I would
20 say -- I mean, I don't know who was on the -- the
21 slate, if -- if that's what you're asking. Both
22 primaries and in a general, I wouldn't know the exact
23 number.

24 I can tell you the people who floated to the
25 top, obviously. Right? Both -- at the Cobb County

1 level, I know there are three African Americans who
2 ran at the Cobb County level -- three females as I
3 recall. And at the -- the district level, Mr.
4 Flowers. The Senate level, of course, Mr. Warnock.
5 And at a gubernatorial level, Ms. Abrams. So those
6 are the ones that I would know. And I'm -- I'm sure
7 Mr. Scott is still around, just in a different
8 district. And I -- I remembered his name that time.

9 Q And do you know how many Black people have
10 been elected to public office in Georgia, to your
11 knowledge?

12 A Now, you said Georgia, and I don't know all
13 of Georgia. And I was -- I can speak to Cobb County.
14 I mean, I -- I can -- all right. Atlanta, obviously,
15 it's our -- our -- part of our -- what we're -- I
16 would consider our close community. Of course, the --
17 the mayor there and the prior -- previous mayor is
18 African American. It's predominantly an African
19 American city.

20 But I -- I do know that the individuals that
21 have now gotten elected to John Lewis' seat, they're
22 African -- that person is African American. So that's
23 one, two, three.

24 The county over from us, McBath, she's
25 African American. And then the ones that I mentioned

1 here. So the --

2 Q Were you -- please. Excuse me. Go ahead.

3 A No. No. That -- that's it.

4 Q Were you aware that the former Chief Justice
5 of the Georgia Supreme Court was Black, and that was a
6 statewide position that he was elected to?

7 A I was not.

8 Q If I mentioned his name -- his name is
9 Harold Melton. Does that ring a bell to you?

10 A It -- it does not.

11 Q And you're aware that Senator Warnock was
12 elected statewide to the United States Senate in 2021;
13 correct?

14 A Yes.

15 Q And are you aware that Herschel Walker was
16 elected in the primary -- the Republican primary by
17 exclusively Republican voters?

18 A Yes.

19 Q Are there any needs of the minority
20 community in Georgia that in your opinion differ from
21 those of the White residents?

22 A It's not a matter of needs. It's interests.

23 Q I mean, tell me what you see as the
24 difference.

25 A Significant difference. The interest of

1 fairness and equity, the interest in full
2 representation is significantly different than in the
3 White community. As you know, historically -- you
4 know, historically, that's been the case, and I don't
5 think it's changed.

6 Q Okay. Explain a little bit more of why it
7 is that you don't think it's changed or that the
8 interests of fairness and equity and the different
9 interests between the White and the Black communities,
10 how they've stayed -- that's stayed the same.

11 A Well, the first is having an elected
12 representative who will meet and talk with you and
13 understand your interest and your concern and your
14 community values. That's the first one, which is what
15 brought me to this table in the first place.

16 But drilling down a bit, when you talk about
17 socioeconomic equity, I don't believe that has
18 changed. And all the things from -- you know, you can
19 talk about -- like today, when I was at the community
20 meeting of the -- the working group, where we talked
21 about the aspect of social justice like -- correction,
22 environmental justice, hearing and seeing what happens
23 in -- in some of these meetings where your elected
24 officials are listening to you versus when they're not
25 listening to you, certain things can happen.

1 Everything from infrastructure, maintenance,
2 to law enforcement -- how you are treated with law
3 enforcement, the extent to which your community is
4 devalued by way of certain construction and zoning
5 laws, where you don't see that in predominantly White
6 communities, or at least they're -- they're heard more
7 and taken seriously in predominantly White
8 communities, again, those are the interests and the
9 values associated with that.

10 The wait lines in some of our communities
11 versus what you see in predominantly White
12 communities. Some of the challenges and hurdles to
13 voting in itself. So that's why I went with the --
14 you know, when you said prohibited, I said that I
15 didn't see an -- an active prohibition. But are they
16 impediments to access to vote? I see that all the
17 time.

18 Their -- their attempt to remove the voting
19 -- the -- the early drop-off boxes. The extent to
20 which our lines are longer. Even the effort to stop
21 us from voting on Saturdays. Those things still
22 exist, and it's not new.

23 Q So do I understand that -- primarily, that
24 the -- there are three main things that you see are an
25 impediment to voting. Longer wait lines. And you

1 mentioned in our community, the removal of drop boxes.
2 And then I think you mentioned the -- well, I guess it
3 was those two. Are those two the main impediments to
4 voting or hurdles to voting?

5 A No. The first one was the representation.
6 Having a representative that reflects our interests
7 and will reach out to us as a community, and talk with
8 us as a community, and understand what our interests
9 and concerns are. Share our values. That's the first
10 one, to me, because that person is the one that will
11 champion our issues and our cause.

12 Q When you spoke about the wait lines and the
13 drop boxes, what -- let me strike that.

14 So what are the particular needs of the
15 minority community in Georgia, in your opinion?

16 A Well, that's -- that's broad. Are you
17 talking about specific to the voting or just -- I
18 mean, because there's a laundry list. I mean, what
19 ...

20 Q Okay. Let's start with voting then.

21 A Okay. Okay.

22 Q The particular needs of the minority
23 community in Georgia pertaining to voting.

24 A Okay. Well, ensuring that our consolidated
25 block is sufficiently maintained, where we can have an

1 impact on deciding who represents us. That's the
2 first one. The other is equal access to voting,
3 meaning machines, locations, dates, and times when you
4 can -- you can vote.

5 Those things are currently controlled by the
6 majority Republican legislature. And anecdotally,
7 when you listen to your colleagues and even friends
8 who are in other jurisdictions, and they talk about
9 their wait time, that's not the experience we have in
10 our community.

11 As it relates to engaging with their
12 representatives, when you look at counties over, their
13 representatives reflect the majority of their
14 interests, not just look like them, but reflect their
15 interests and their values.

16 And all of those things, I believe, has a
17 cascading impact on the vote and our participation and
18 all of those areas.

19 MS. LAROSS: At this point, Mr.
20 Richards, I'd actually like to take a break for a
21 moment.

22 THE WITNESS: Okay. Okay.

23 MS. LAROSS: And look at my notes. If
24 that's okay with you.

25 And if that's all right with you, Mike.

1 And if we could take 15 minutes, I think that -- I'd
2 appreciate that -- unless you'd like to take a longer
3 break or have a different length.

4 THE WITNESS: The -- the only thing I
5 would ask is, I've got a pick-up of my daughter at
6 3:30. Now, I can ask my mother-in-law to go get her,
7 but if she says I'm not feeling well or whatever, then
8 I've got to go pick up my daughter. Nothing is more
9 important than that.

10 MS. LAROSS: Okay. So would you need
11 to leave at 3:30 to get her, or you've got to be there
12 to get her by 3:30?

13 THE WITNESS: I would have to -- well,
14 I mean, as long as I'm there, like, at -- but it
15 may -- it may be a moot point. Let me ask my
16 mother-in-law. It may be a moot point.

17 MS. LAROSS: Okay. All right. Why
18 don't we take ten minutes. And then I'll check my
19 notes and see how much longer we're going to -- if
20 we're going to be longer, and we'll let you know how
21 much longer I would estimate.

22 THE WITNESS: Okay. Are we dropping
23 off --

24 MS. LAROSS: Does that work?

25 THE WITNESS: -- the call, or are we

1 just going to put the -- the lines and video on -- on
2 pause?

3 MS. LAROSS: Yeah, just put everything
4 on pause.

5 THE WITNESS: Okay.

6 MS. LAROSS: Yeah, and don't drop off
7 the Zoom.

8 THE WITNESS: Okay. Okay.

9 THE REPORTER: We are off the record.
10 The time is 3:01 p.m.

11 (Off the record.)

12 THE REPORTER: We are back on the
13 record. The time is 3:12 p.m.

14 You may proceed when ready, Counsel.

15 MS. LAROSS: Thank you.

16 Mr. Richards, I have no further
17 questions. We very much appreciate your time today.

18 THE WITNESS: Okay.

19 MS. LAROSS: And unless Mr. Jones has
20 any questions, then I think we're completing the
21 deposition.

22 MR. JONES: I have no questions.

23 THE REPORTER: All right. Before we go
24 off the record, I'd like to confirm that you tendered
25 no exhibits today, Ms. LaRoss; is that correct?

1 MS. LAROSS: That's correct.

2 THE REPORTER: And you're reserving
3 signature, Mr. Jones. Did you want that to be
4 e-mailed to you or to Mr. Richards, individually?

5 MR. JONES: Please e-mail that to me
6 using the address that I provided you earlier today.

7 THE REPORTER: Thank you so much.

8 And will you be placing an order today,
9 Ms. LaRoss, or not at this time?

10 MS. LAROSS: Yeah. We certainly want a
11 copy. And other than that, I'll let you know if I
12 need anything else.

13 THE REPORTER: All right. Thank you.

14 How about yourself, Mr. Jones, placing
15 an order or not at this time?

16 MR. JONES: We would like a copy.

17 THE REPORTER: Thank you, everyone.

18 We're off the record. The time is 3:13 p.m.

19 (Signature reserved.)

20 (Whereupon, at 3:13 p.m., the
21 proceeding was concluded.)
22
23
24
25

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

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CERTIFICATE OF DEPOSITION OFFICER

I, DANIEL ALMEKINDER, the officer before whom the foregoing proceedings were taken, do hereby certify that any witness(es) in the foregoing proceedings, prior to testifying, were duly sworn; that the proceedings were recorded by me and thereafter reduced to typewriting by a qualified transcriptionist; that said digital audio recording of said proceedings are a true and accurate record to the best of my knowledge, skills, and ability; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this was taken; and, further, that I am not a relative or employee of any counsel or attorney employed by the parties hereto, nor financially or otherwise interested in the outcome of this action.



DANIEL ALMEKINDER

Notary Public in and for the
State of Georgia

☒ [X] Review of the transcript was requested.

CERTIFICATE OF TRANSCRIBER

I, KATIA LAZARRE, do hereby certify that this transcript was prepared from the digital audio recording of the foregoing proceeding, that said transcript is a true and accurate record of the proceedings to the best of my knowledge, skills, and ability; that I am neither counsel for, related to, nor employed by any of the parties to the action in which this was taken; and, further, that I am not a relative or employee of any counsel or attorney employed by the parties hereto, nor financially or otherwise interested in the outcome of this action.



KATIA LAZARRE

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1 Mike Jones

2 mjones@elias.law

3 December 19, 2022

4 RE: Pendergrass, Coakley, Et Al. v. Raffensperger, Brad, Et Al.

5 12/5/2022, Robert Richards (#5609279)

6 The above-referenced transcript is available for
7 review.

8 Within the applicable timeframe, the witness should
9 read the testimony to verify its accuracy. If there are
10 any changes, the witness should note those with the
11 reason, on the attached Errata Sheet.

12 The witness should sign the Acknowledgment of
13 Deponent and Errata and return to the deposing attorney.
14 Copies should be sent to all counsel, and to Veritext at
15 cs-southeast@veritext.com

16
17 Return completed errata within 30 days from
18 receipt of testimony.

19 If the witness fails to do so within the time
20 allotted, the transcript may be used as if signed.

21
22 Yours,

23 Veritext Legal Solutions
24
25

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Robert Richards (#5609279)

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Robert Richards

Date

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1 Pendergrass, Coakley, Et Al. v. Raffensperger, Brad, Et Al.
2 Robert Richards (#5609279)

ACKNOWLEDGEMENT OF DEPONENT

4 I, Robert Richards, do hereby declare that I
5 have read the foregoing transcript, I have made any
6 corrections, additions, or changes I deemed necessary as
7 noted above to be appended hereto, and that the same is
8 a true, correct and complete transcript of the testimony
9 given by me.

11 _____
12 Robert Richards

_____ Date

13 *If notary is required

14 SUBSCRIBED AND SWORN TO BEFORE ME THIS
15 _____ DAY OF _____, 20____.

16
17
18 _____
19 NOTARY PUBLIC
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[05339 - administrative]

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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY.

THE ABOVE RULES ARE CURRENT AS OF APRIL 1, 2019. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

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COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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