

EXHIBIT 42

Grant, Annie Lois, et al.v. Raffensperger, Brad, E

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1 UNITED STATES DISTRICT COURT
2 FOR THE NORTHERN DISTRICT OF GEORGIA
3 ATLANTA DIVISION

4 ANNIE LOIS GRANT, et al.,

5 Plaintiffs,

6 v.

CIVIL ACTION FILE
NO. 1:22-CV-00122-SCJ

7 BRAD RAFFENSPERGER, in his
8 official capacity as the
9 Georgia Secretary of
10 State, et al.,

11 Defendants.

12 COAKLEY PENDERGRASS, et al.,

13 Plaintiffs,

14 v.

CIVIL ACTION FILE
NO. 1:21-CV-05339-SCJ

15 BRAD RAFFENSPERGER, et al.,
16 Defendants.

17 VIDEOTAPED ZOOM DEPOSITION OF
18 MAXWELL PALMER, Ph.D.

19 February 22, 2023

20 9:28 A.M.

21 Lee Ann Barnes, CCR-1852B, RPR, CRR, CRC
22
23
24
25

1 A. I'm not if he was using the same data that
2 was available to him. He might just be using the
3 results of my report and not looking at the data
4 itself.

5 COURT REPORTER: Excuse me. Could you
6 repeat the objection, please? It was spoken
7 over.

8 MR. JACOUTOT: It was just object to form.

9 COURT REPORTER: Thank you.

10 BY MR. HAWLEY:

11 Q. With that data and with the methodology
12 that you applied to reach your results, Dr. Palmer,
13 is it possible for Dr. Alford to make a subjective
14 determination as to causation, which is to say, why
15 voters voted the way they did?

16 MR. JACOUTOT: Object to form.

17 THE WITNESS: I -- I don't believe so.

18 MR. HAWLEY: Okay. That's all I have.

19 MR. JACOUTOT: Okay. And I don't have any
20 follow-up, so I think we can call it a day.

21 VIDEOGRAPHER: All right. The time on the
22 monitor is 11:51 a.m. We're going off the
23 record.

24 (Deposition concluded at 11:51 a.m.)

25 (Pursuant to Rule 30(e) of the Federal