

EXHIBIT 39

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.,)

)

Plaintiff,)

)

vs.) CIVIL ACTION FILE

) NO. 1:21-CV-05339-SCJ

BRAD RAFFENSPERGER, et al.,)

)

Defendants.)

)

Deposition of Ojuan Glaze

December 14, 2022

10:08 a.m.

Remote via Zoom technology

Reported by: Carla J. Hopson, RPR, CCR-1816

1 Q I'm not asking any legal conclusion,
2 just your general knowledge, Mr. Glaze?

3 A That's my understanding.

4 Could you give me one second real quick?
5 Is that okay?

6 Q Sure. Why don't -- yeah, we can -- why
7 don't -- do you want to take like a -- just a
8 five-minute break.

9 A Yes.

10 (Recess.)

11 Q (By Ms. LaRoss) Mr. Glaze, are you ready
12 to go?

13 A Ready.

14 Q Thank you. I had asked you about the
15 amended complaint in this case. I would show it to
16 you but my share screen is disabled, so I'm just
17 going to read for you a couple of the sentences from
18 the complaint and you can just tell me if they're
19 accurate or not. I apologize that I'm not just
20 showing it to you.

21 So Paragraph 16 of the amended complaint
22 says -- it begins, it says, Plaintiff, Ojuan Glaze,
23 is a black citizen of the United States and the
24 state of Georgia. Mr. Glaze is a registered voter
25 and intends to vote in future congregational

1 elections. He is a resident of Douglas County and
2 located in the 13th congregational district under
3 the inactive plan.

4 Are all of those statements true and
5 correct today?

6 A That's correct.

7 Q Okay. And you intend to vote in future
8 congressional elections?

9 A I do.

10 Q And what candidate did you vote for in
11 the 13th Congressional District this past November?

12 A David Scott.

13 Q Had you voted for Mr. Scott previously?

14 A I have.

15 Q Did you reach out to any legislators
16 during the 2021 special session of the General
17 Assembly here in Georgia? And I'm asking
18 specifically concerning redistricting.

19 A No.

20 Q Had you reached out to any legislators
21 in the General Assembly concerning restricting
22 issues before the 2021 special election? Sorry.
23 Special session, excuse me, on the General Assembly.

24 A Not redistricting -- not redistricting,
25 no.