

EXHIBIT 34

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 NO.
)
BRAD RAFFENSPERGER, et al.,) 1:21-CV-05339-SCJ
)
Defendants.)

The DEPOSITION of:

COAKLEY PENDERGRASS

Being taken pursuant to stipulations herein:

Before Kathryn Taylor, CCR

THURSDAY, DECEMBER 15, 2022

Commencing at 3:00 p.m.

All parties, including the court reporter, appeared by
videoconference.

Job No. 5623315

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1 this document?

2 A. I do.

3 Q. All right. Okay. Scrolling down to
4 Paragraph 11 where it mentioned you specifically, do
5 you agree with the statements in this paragraph?

6 A. I did when I first read it. Let me just
7 scroll through it again and make sure.

8 Q. Do you need me to zoom in?

9 A. Say that again.

10 Q. Do you need me to zoom in on the paragraph?

11 A. Oh, no, I'm fine.

12 Q. Okay.

13 A. I agree with that, yes.

14 Q. Okay. Let me go ahead and stop sharing my
15 screen.

16 All right. Did you reach out to any
17 legislators during the 2021 special session concerning
18 redistricting issues raised in your complaint?

19 A. No.

20 Q. How about before or after the special
21 session?

22 A. Did I reach out to any legislators? No, I
23 did not.

24 Q. Okay. Did you testify in the Georgia
25 Assembly on those issues or any issues pertaining to