

EXHIBIT 7



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Transcript of Michael McClanahan, Designated Representative

Date: September 8, 2023

Case: Nairne, et al. -v- Ardoin

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IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF LOUISIANA

DR. DOROTHY NAIRNE, : CIVIL ACTION NO.:
et al., : 3:22-cv-00178-SDD-SDJ
Plaintiffs, :
v. : Chief Judge
R. KYLE ARDOIN, in his : Shelly D. Dick
official capacity as : Magistrate Judge
Secretary of State of : Scott D. Johnson
Louisiana, :
Defendant. :

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30(b)(6) DEPOSITION
OF LOUISIANA STATE CONFERENCE OF THE NAACP
through their representative
MICHAEL McCLANAHAN
CONDUCTED VIRTUALLY
FRIDAY, SEPTEMBER 8, 2023
10:04 a.m. EST

Job No.: 506194

Pages 1 - 137

Reported by: APRIL REID

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

2

1 Deposition of MICHAEL McCLANAHAN, held
2 virtually. All appeared remotely.

3
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Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

3

1 A P P E A R A N C E S cont'd

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Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

4

1 A P P E A R A N C E S cont'd

2

3 ALSO PRESENT:

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6 Louisiana Attorney General's Office

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8 ROB CLARK, ESQ.

9 AMANDA GIGLIO, ESQ.

10 DAKOTA KNEHANS, ESQ.

11 Cozen O'Connor - observing only

12

13 ALORA THOMAS-LUNDBORG, ESQ.

14 ACLU

15

16 JACK ADCOCK

17

18 JACKSON SCHUELER,

19 Remote Technician

20

21

22

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Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

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18
19
20
21
22
23
24
25

I N D E X

MICHAEL MCCLANAHAN	PAGE
Examination by Ms. Holt	7
Examination by Ms. Prouty	121
Examination by Ms. Rohani	134

E X H I B I T S

NUMBER	DESCRIPTION	PAGE
Exhibit 1	Second Amended 30(b)(6) Notice of Deposition	15
Exhibit 2	Printout of the Executive Committee page of the Louisiana NAACP Website	25
Exhibit 3	Amended Complaint for Declaratory Judgment and Injunctive Relief	39
Exhibit 4	Plaintiff NAACP Louisiana State Conference's Supplemental Responses & Objections to Defendant Ardoin's First Set of Interrogatories and First Set of Requests for Production of Documents to the Organizational Plaintiffs	60

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

6

1	E X H I B I T S		
2	NUMBER	DESCRIPTION	PAGE
3	Exhibit 5	NAACP's Responses to	95
4		Defendant's First Set of	
5		Discover	
6			
7			
8			
9			
10			
11			
12			
13			
14			
15			
16			
17			
18			
19			
20			
21			
22			
23			
24			
25			

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

7

1 P R O C E E D I N G S

2 THE COURT REPORTER: Good morning, Mr.
3 McClanahan. If you will please raise your
4 right hand.

5 THEREUPON:

6 MICHAEL MCCLANAHAN

7 being first duly sworn or affirmed to
8 testify to the truth, the whole truth, and
9 nothing but the truth, was examined and
10 testified as follows:

11 THE COURT REPORTER: Thank you, sir.
12 We may begin.

13 EXAMINATION

14 BY MS. HOLT:

15 Q. Good morning. My name is Cassie Holt,
16 and I'll be taking your deposition today. I'm
17 with the law firm Nelson Mullins, and we represent
18 the defendant, Kyle Ardoin in his official
19 capacity as the Louisiana Secretary of State,
20 styled as Nairne v. Ardoin, pending in the United
21 States District Court for the Middle District of
22 Louisiana.

23 Mr. McClanahan, I appreciate you making
24 yourself available today so I can ask you a few
25 questions.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

8

1 (Amanda Giglio, Esq. entered the virtual
2 deposition room.)

3 A. Okay.

4 Q. Can you please state your full name, for
5 the record.

6 A. My name is Michael Wayne McClanahan.

7 Q. Have you gone by any other name?

8 A. I'm in Louisiana, so they have nicknames
9 for everybody here.

10 Q. All right. Well -- but not officially?

11 A. No, ma'am.

12 Q. No official -- okay.

13 What is your current address?

14 A. Business address or personal address?

15 Q. Let's do -- let's do both. What's your
16 personal address?

17 A. My personal address is 1473 South
18 Redondo Drive, Baton Rouge, Louisiana 70815, and
19 my business address is 7600 Airline Highway, Baton
20 Rouge, Louisiana 70814.

21 Q. Great.

22 And are you registered to vote at your
23 current personal address?

24 A. Yes, I am.

25 (Dakota Knehans, Esq. entered the

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

9

1 virtual deposition room.)

2 Q. Have you ever been deposed or testified
3 in court before?

4 A. Yes, I have.

5 Q. Okay. In what matters have you
6 testified?

7 A. Recently, I had a deposition in a -- and
8 testified in a suit which me and some plaintiffs
9 sued the City of Baton Rouge.

10 Q. And do you recall when that was?

11 A. Last year or the year before. One of
12 the two.

13 Q. And you said sued the City of -- or
14 Baton Rouge?

15 A. Baton Rouge, right.

16 Q. Okay. And what was that case about
17 generally?

18 A. Well, the City of Baton Rouge had --
19 during its council meeting, me and some others
20 went there to talk about the Alton Sterling
21 murder, and the council did not want to -- want to
22 let us speak, and so they had the police to escort
23 us out.

24 Q. Okay. And as we get started today, I
25 know you're a little -- you're familiar with --

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

10

1 you've had -- you've been deposed and testified.
2 Were there -- actually, let me ask you this: Were
3 there any other matters in which you testified?

4 A. Probably. You know, probably over my
5 lifetime, my professional lifetime, probably so.

6 Q. Okay. And do you recall any of those
7 today?

8 A. Not like I recall the last one.

9 Q. That's fair enough.

10 So as we get started today, I'm going to
11 just remind you of a few ground rules that will
12 help us move through this process.

13 Since we do need to make sure that the
14 court reporter can record all of your responses,
15 can you please make sure to -- or try to give a
16 verbal response to all my questions today?

17 A. Yes.

18 Q. Okay. And to avoid confusion on the
19 record and to make it a little easier on the court
20 reporter, I ask if you could please wait until I
21 finish a question before you give your answer.
22 And I will try to do the same for you, let you
23 finish speaking before I ask the next question.
24 Does that sound good?

25 A. Sounds good to me.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

11

1 Q. Great.

2 And I'm going to try to ask you
3 questions that are clear and concise. I don't
4 always do a good job of that, so if you don't
5 understand one of my questions, please let me know
6 and I will do my best to rephrase it. Does that
7 sound good?

8 A. Sure.

9 You're going to be all right. I know
10 that already. You're ready.

11 Q. All right. Well, you know, this --
12 these things can go on. This is not an endurance
13 test. So if you need a comfort break or anything
14 like that, please let me know. I just ask that
15 you let me finish my question and then I'm happy
16 to oblige.

17 A. Thank you.

18 Q. And -- yeah. No problem.

19 And -- let's see. And lastly, do you
20 understand that you are testifying here today
21 under oath, just as if you were in a real
22 courtroom testifying before a judge or jury?

23 A. Yes.

24 Q. Okay. And is there anything that would
25 prevent you from answering any of my questions

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

12

1 today honestly and completely?

2 A. No.

3 Q. Great.

4 Mr. McClanahan, are you a member of the
5 NAACP?

6 A. Yes.

7 Q. And how long have you been a member?

8 A. Over ten years, I would imagine.

9 Q. Do you pay dues?

10 A. I don't anymore. I'm a life member.

11 Q. Okay. Life member.

12 Are you -- when you say you're a "life
13 member," does that -- are you a life member of the
14 Louisiana NAACP?

15 A. No. You're just -- you're a member of
16 the NAACP period. There's no -- you don't pay
17 membership to anything but the national office.

18 Q. Okay. Do you belong to any local
19 branches or units?

20 A. Yes. I'm a member of the Baton Rouge
21 branch.

22 Q. Do you pay any dues to the Baton Rouge
23 branch?

24 A. No.

25 Q. Do you have any positions with the Baton

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

13

1 Rouge branch?

2 A. No.

3 Q. And what is your current title with the
4 Louisiana -- Louisiana State Conference of the
5 NAACP?

6 A. I'm the president.

7 Q. And if I shorten that down to "State
8 Conference" or "Louisiana NAACP," will you know
9 what I'm referring to?

10 A. I would.

11 Q. Great.

12 How long have you been president?

13 A. Seems like forever. Probably about
14 five, six years now, it looks like.

15 Q. Okay. And is that an elected position?

16 A. It is.

17 Q. And is it a paid position?

18 A. No. No. No.

19 Q. All right. Well, that answers my
20 question for that.

21 Well, is it -- so you're not an employee
22 of the State Conference?

23 A. No.

24 Q. So do you have any other work that you
25 do for income?

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

14

1 A. Yes, I do.

2 Q. And what is that?

3 A. I'm -- I am a home manager for a company
4 here in Baton Rouge called Harmony Center, and
5 then I -- I have -- I'm a political consultant,
6 and then I have a little small home repair
7 company.

8 Q. And your role as a political consultant,
9 is that for a company?

10 A. Yes.

11 Q. And what's the name of that company?

12 A. The Sharp Group.

13 Q. And out of those three that you just
14 gave me, what would you say is your primary form
15 of income?

16 A. Probably the Harmony Center.

17 Q. Did you hold any positions with the
18 State Conference before being elected president?

19 A. No.

20 Q. And what are your duties as state
21 president?

22 A. My duties is to continue to promote the
23 mission of the NAACP through the state of
24 Louisiana. I facilitate and coordinate work with
25 the branches and -- the adult branches and the

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

15

1 youth and college chapters, and -- and --
2 throughout the state of Louisiana.

3 Q. Do you report to anyone?

4 A. No.

5 Q. Does anyone report to you?

6 A. Yes.

7 Q. And -- and who reports to you?

8 A. So my -- I have district vice
9 presidents, they report to me, and/or the
10 presidents of the various branches.

11 Q. Okay. Now I'm going to ask the tech to
12 pull up a document called the Second Amended
13 Notice of 30(b)(6), which I would like to be
14 marked as Exhibit 1, please.

15 (Exhibit 1 was marked for identification
16 and is attached to the transcript.)

17 MS. HOLT: Excellent. Thank you.

18 BY MS. HOLT:

19 Q. And, Mr. McClanahan, if you have hard
20 copies that would -- that you'd like to look at,
21 if that's easier than looking at the computer
22 screen, that's completely fine.

23 I'm just going to ask you a couple
24 questions about this Exhibit 1.

25 Do you recognize this document?

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

16

1 A. Yes, I do.

2 Q. And what is it?

3 A. It's Amended Notice of a deposition
4 of -- of the State -- the State Conference.

5 Q. So you understand that you've been asked
6 here to testify today on behalf of the State
7 Conference?

8 A. Yes.

9 Q. And do you understand that as the
10 30(b)(6) designee, your answers are binding on the
11 State Conference?

12 A. Yes.

13 Q. Okay.

14 MS. HOLT: And if we can turn to the
15 very last page of the exhibit. Excellent.

16 Q. Mr. McClanahan, is it your understanding
17 that you're here today to testify regarding the
18 topics listed in this Exhibit A?

19 A. Yes.

20 Q. And what did you do to prepare for this
21 deposition?

22 A. Well, I looked over the Exhibit A and
23 became familiar with -- that you talked about,
24 went over the responses to the interrogatories,
25 read -- then I read the constitution and by-laws,

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

17

1 you know, just consulted with my lawyers and sat
2 down and prepared to go ahead today.

3 Q. Great.

4 And when you say "interrogatory
5 responses," are you referring to both the initial
6 interrogatory responses and supplemental
7 interrogatory responses?

8 A. Yes.

9 Q. Okay. Great.

10 And did you -- besides the interrogatory
11 responses, this exhibit, the constitution, and the
12 by-laws, did you review any other documents?

13 A. Yes. Yes, I did.

14 Q. And do you recall what those are?

15 A. Yeah. I looked at the illegal maps
16 passed by the state of Louisiana, and then I
17 looked at the illustrative maps that we had
18 introduced.

19 Q. And when you say "the illustrative maps
20 we had" produced [sic], what are you referring to?

21 A. The maps that our demographer had
22 produced.

23 Q. And is that an expert in this case?

24 A. I don't know.

25 Q. Is it William Cooper?

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

18

1 A. Yeah, Bill Cooper, right, uh-huh.

2 Q. Okay. Great.

3 And were -- and were there any other
4 documents that you looked at?

5 A. I'm -- I don't think so. I'm -- yeah,
6 I'm quite sure that's pretty much it. But if
7 something else comes to mind, I'll let you know.

8 Q. All right. Thanks. I appreciate that.

9 So I believe you mentioned the
10 constitution.

11 MS. HOLT: And we can take down this
12 Exhibit 1. Thank you.

13 Q. So, Mr. McClanahan, you reviewed the
14 by-laws and constitution of the NAACP.

15 Are you familiar with the organizational
16 structure of the NAACP?

17 A. Yes.

18 Q. And what is the purpose of the
19 constitution and by-laws?

20 A. The constitution and by-laws set the
21 groundwork and the framework for the headquartered
22 association and its members, member of state
23 conferences, and its member branches, as well as
24 its members.

25 Q. And would you agree with me that as

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

19

1 state president, you're expected to follow the
2 constitution and by-laws?

3 A. Yes.

4 MS. ROHANI: Objection.

5 Q. What is the -- now, you said "branches."
6 Is there a difference between branches and units?

7 A. In my mind, no.

8 Q. Okay. Why -- why do you say in your
9 mind?

10 A. Because -- you know, because we use
11 those terms here in Louisiana interchangeable, you
12 know, unit, branches.

13 Q. Okay. Great.

14 Do all branches or units have to report
15 to the State Conference?

16 A. All do. In the State of Louisiana, they
17 do.

18 Q. Okay. How many adult branches does the
19 Louisiana State Conference have?

20 A. About -- about 40. About 40 or so, I
21 would imagine.

22 Q. And is that the same number for units?

23 A. Yes.

24 Q. Okay. Great.

25 And what -- what do the branches or

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

20

1 units have to do to stay in good standing with the
2 State Conference?

3 A. They have to maintain a membership --
4 registered membership of at least 50 members.
5 They have to file an annual financial report, pay
6 the national assessment, and pay the state
7 assessment.

8 Q. And who monitors whether branches meet
9 those requirements?

10 A. Well, the national office has -- has an
11 office that assigns it. If they fall below it,
12 then they're -- if they file below 50 members,
13 then they're deemed to be out of compliance first.
14 But if they don't file the AFR or pay the
15 assessment, then they're out of compliance that
16 way, too.

17 Q. Now, the -- you mentioned the annual
18 financial reports. Who are those sent to?

19 A. They're sent to the financial department
20 for the international office.

21 Q. Does the State Conference have a
22 physical office?

23 A. Yes.

24 Q. And where is that office?

25 A. We -- we recently moved this year to

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

21

1 7600 Airline Highway.

2 Q. And do you report to that office?

3 A. Yes, I do.

4 Q. Do you go there daily?

5 A. It all depends, you know, because it's
6 not a paid position, so...

7 Q. Right.

8 A. You know. As the need arises, I -- I
9 will stop by.

10 Q. Okay. Does the State Conference have
11 any paid employees?

12 A. No, we don't.

13 Q. And how is the State Conference funded?

14 A. It's funded by -- we have a -- we have a
15 convention and a Freedom Fund banquet. We -- by
16 that way. Or if we have -- host any type of
17 events, like a prayer breakfast, we receive funds
18 that way.

19 Q. You mentioned the convention. Who can
20 attend the convention?

21 A. Anyone. It's open and free to the
22 public.

23 Q. And are you having the convention this
24 year?

25 A. Yes.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

22

1 And we would like to have all of you
2 come attend. Go to our website and register and
3 come down and look at what we're doing and have a
4 great time.

5 Q. Well, where is it at? Let me ask you
6 that.

7 A. I'm glad you asked. I like you.

8 It's going to be dinner at Paragon
9 Casino. And we're going to have a great time.
10 It's a three-day event, Thursday, Friday, and
11 Saturday. And you're welcome to -- we have
12 trainings for all kinds of activities. And you
13 will love it.

14 (Alora Thomas-Lundborg, Esq. entered the
15 virtual deposition room.)

16 Q. Thank you very much.

17 All right. So getting back to the
18 organization, does the State Conference have a
19 board of directors?

20 A. No.

21 Q. Does the State Conference have an
22 executive committee?

23 A. Yes.

24 Q. And what is the role of the Executive
25 Committee?

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

23

1 A. Executive Committee is really the -- the
2 brain trust of the State Conference. They -- the
3 Executive Committee acts as, lack of a better
4 term, the board. But there's only one board in
5 the NAACP, which is the national board, which I
6 serve on also. So the committee sets the tone for
7 anything; the new business, the old business,
8 anything that we do.

9 Q. And who is on the Executive Committee
10 for the State Conference?

11 A. All of the officers. You know, all of
12 the officers. That means vice presidents,
13 secretary, the treasurer, they make up -- and the
14 committee chairs make up the Executive Committee.

15 Q. Does someone have to be a member of the
16 NAACP to be on the Executive Committee?

17 A. Yes.

18 Q. Does the State Conference have any other
19 officers?

20 I believe you mentioned VP, president,
21 but are there -- are there other officers?

22 A. Not at the State Conference. There are
23 no officers other than those, that I'm aware of.

24 Q. Now, I believe you mentioned district
25 vice presidents. Do you know how many the

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

24

1 Louisiana State Conference has?

2 A. I want to say eight. I want to say
3 eight.

4 Q. And does someone have to be a member of
5 the NAACP to be a district vice president?

6 A. Yes.

7 Q. Does that person have to live in a
8 particular place?

9 A. Has to live in that particular district
10 that that position comes from.

11 Q. Okay. And the -- I'm going to call it
12 the jurisdiction of the VPs, because that's the
13 way that I think about it, but please correct me
14 if you'd like to call it something different.

15 Does the jurisdiction of the VPs cover
16 multiple parishes?

17 A. Yes.

18 Q. So is it fair to say that a district VP
19 needs to live in one of the parishes in their
20 jurisdiction?

21 A. Right.

22 Q. And, Mr. McClanahan, I believe you
23 mentioned that the State Conference has a website.

24 A. Yes.

25 Q. And that website is publicly available?

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

25

1 A. Yes.

2 MS. HOLT: I'd like to pull up a
3 document called "Louisiana NAACP Website,"
4 which I'd like to be marked as Exhibit 2,
5 please.

6 (Exhibit 2 was marked for identification
7 and is attached to the transcript.)

8 BY MS. HOLT:

9 Q. Okay. Can you see that, Mr. McClanahan?

10 A. Yes.

11 Q. And do you recognize this document?

12 A. Yes.

13 Q. Okay. I'll represent to you that it is
14 a printout of the Executive Committee page of the
15 Louisiana NAACP website. Do you have any reason
16 to dispute that?

17 A. Could you raise it up from the top to
18 the bottom --

19 Q. Sure.

20 MS. HOLT: Let's do that.

21 A. -- so I can see it.

22 Okay. Okay. All right.

23 Q. All right. Now, does this page contain
24 the names and pictures of the members of the
25 Executive Committee?

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

26

1 A. Yes.

2 MS. HOLT: And if we can scroll back
3 down to the second page.

4 Q. Does this -- does this --

5 MS. HOLT: If we can go up just a little
6 bit so we can get the end. Right there.
7 Perfect.

8 Q. Does this contain the names and contact
9 information for the Louisiana State Conferences
10 district vice presidents?

11 A. It's more than that. I see four of
12 them. It should be probably about eight of them
13 listed.

14 Q. Okay.

15 MS. HOLT: And we can scroll -- we can
16 scroll down. I just wanted to get that
17 title. If we could -- let's see.

18 Q. It might have cut off in the printing.
19 But do you recognize these six people to
20 be some of the district vice presidents?

21 A. I do.

22 Q. All right. Now, do you see e-mail
23 addresses under each of these six names?

24 A. Yes, I do.

25 Q. Do you know if those are personal e-mail

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

27

1 addresses?

2 A. I don't.

3 Q. Okay. Are you concerned that someone
4 could identify these persons as members by posting
5 this information on the publicly-available
6 website?

7 A. I'm not.

8 Q. Why not?

9 MS. ROHANI: Objection.

10 Q. You can answer.

11 A. I'm not because it's -- because the
12 website itself is public. And so, you know, if
13 anybody want to know anything about Mr. Coleman,
14 they can look to the website. If we wanted to be
15 anything other than that, then we would have done
16 something other than this.

17 Q. Is Mr. Coleman -- did Mr. Coleman give
18 you permission to post this information on the
19 website?

20 A. He gave -- yes, he gave that to the
21 secretary.

22 Q. Have any of these people listed on the
23 website waived their First Amendment standing
24 privilege in this litigation?

25 A. I don't understand what you're asking.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

28

1 Q. Sure.

2 So my understanding of the Louisiana
3 NAACP's position is that its members' identities
4 are protected by First Amendment associational
5 standing or First Amendment -- First Amendment
6 privilege. I -- excuse me.

7 MS. ROHANI: Objection. This calls for
8 legal conclusion.

9 MS. HOLT: Okay. I'm going to move --
10 move on from that.

11 Q. What are the qualifications for
12 membership in the NAACP?

13 A. Membership, all I know -- all I'm
14 familiar with is you have to pay your membership
15 dues, for lack of a better term, and you can
16 become a member of the NAACP.

17 MS. HOLT: And we can take down that
18 Exhibit 2. Thank you.

19 Q. Is there a minimum age for someone to
20 become a member?

21 A. No. You can be a baby.

22 Q. Do you have to be a certain race?

23 A. No. You could be -- we're all
24 inclusive.

25 Q. That includes nationality as well?

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

29

1 A. We are all inclusive.

2 Q. Do you have to be a registered voter?

3 A. Not to my knowledge, it's not -- not --
4 it's not a requirement.

5 Q. Once an adult becomes a member, what
6 does he or she have to do to remain in good
7 standing?

8 A. We would like to hope that you keep your
9 membership dues paid up. As long as your
10 membership dues is paid up, then you're good.

11 Q. And how does someone become a member of
12 the State Conference?

13 A. Well, they don't become members of the
14 State Conference, per se. Not individually. They
15 just have to become a member of the branch.

16 Q. Okay.

17 A. The branch is a member of the State
18 Conference.

19 Q. Great.

20 So if someone becomes a member of a
21 particular branch in Louisiana, is it fair to say
22 they're automatically a member of the State
23 Conference?

24 (Jack Adcock entered the virtual
25 deposition room.)

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

30

1 A. Per se. Per se. But the branch has to
2 be in good standing. So if not, then they're not
3 in -- then the branch is not really technically a
4 member unless it stays in good standing.

5 Q. How does the State Conference monitor
6 whether a branch is in good standing?

7 A. Goes back to what I said earlier, the
8 national office keeps track and lets us know who's
9 in compliance and who's not.

10 Q. Are there any branches in Louisiana
11 currently that are not in good standing?

12 A. I haven't checked recently because, you
13 know, my staff -- I mean, the secretaries and
14 those persons keep -- kind of keep that stuff up.
15 But as it gets closer to our state convention,
16 they'll let me know.

17 Q. Do you recall during last year's state
18 convention if there were any branches that weren't
19 in good standing?

20 A. You're asking a 58-year-old some
21 questions that I -- I -- just -- I don't know the
22 number, if you're asking for a number. I wouldn't
23 know a number.

24 Q. Well, I don't need a number, per se, but
25 what's -- do you recall there being at least one

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

31

1 branch not in good standing?

2 A. At least one branch not in good
3 standing.

4 Q. Do you remember what that branch was?

5 A. I don't. Because I'm trying to get them
6 all to be in good standing, so...

7 Q. That's fair.

8 So what does the State Conference do to
9 make sure its members and the members of the
10 branches, by explanation, are in good standing?

11 A. Repeat that.

12 Q. Sure.

13 So let -- let me rephrase that. You
14 said that members pay dues; right?

15 A. Right.

16 Q. If you can audibly say that for the
17 record, that would be great.

18 A. Right. Right. Right.

19 Q. And they need to pay dues to continue to
20 be in good standing, I believe is what you --

21 A. Right.

22 Q. How does the State Conference track
23 whether or not a member has paid their dues?

24 A. The national office does that because
25 all membership fees, dues, goes to the national

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

32

1 office.

2 Q. Does the national office send you
3 reports on which members have and haven't paid
4 their dues?

5 A. It would probably go to the branch as
6 opposed to coming to me. Branches look after the
7 members, and I look after the branches.

8 Q. And how often does the national office
9 send reports?

10 A. I don't know. I don't know if they send
11 them monthly, quarterly, I don't know that, but
12 they send them. They send them periodically, I
13 know that.

14 Q. And what happens when a nonpaying member
15 is identified?

16 A. Well, if he's a nonpaying member -- what
17 you mean by "nonpaying member"?

18 Q. Well, to pay his dues.

19 A. Okay. If he failed to pay his dues,
20 then I would imagine -- I would imagine the branch
21 would get some type of notification. I
22 wouldn't -- I don't really look at memberships.
23 Those things go to the branches. I deal with the
24 branches.

25 Q. And do you know who in the branches

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

33

1 would be in charge of overseeing who pays and who
2 doesn't pay dues?

3 A. That's probably -- it's probably two,
4 two person. They should have a membership chair
5 and a secretary.

6 Q. To be a member of a particular branch,
7 do you have to be a permanent resident in the area
8 that the branch is located?

9 A. No.

10 Q. So if I live in Baton Rouge, I could be
11 a member of the New Orleans branch?

12 A. Yes, but -- you can, but you -- to be a
13 member of a particular branch, you have to either
14 live -- live where that branch is located or work
15 where that branch is located.

16 Q. Okay. And who determines -- do you know
17 who determines if somebody lives or works within
18 the branch?

19 A. I don't.

20 Q. Do you belong to -- to one branch at a
21 time or multiple branches?

22 A. Just one. One is enough.

23 Q. All right. Fair.

24 Sir, what happens if a member passes
25 away? How is that -- how is that -- or how is

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

34

1 that recorded?

2 A. It's not recorded, per se. Only when we
3 have -- only when the branch has memorial services
4 and they would notify -- identify that that member
5 has more or less transitioned to -- to be with the
6 Lord. But outside of that, I don't think there's
7 nothing that is recorded officially. I'm not
8 familiar with it, if it is.

9 Q. Does the State Conference know when a
10 member has passed away?

11 A. Not all. Not all persons that pass away
12 I would get a notice of, you know. But I pretty
13 much get notices, you know, regularly, but I may
14 not get all notices.

15 Q. And what do you do with those notices
16 when you get them?

17 A. Well, what we do is try to find out --
18 talk to the family and probably send a -- some
19 type of flower or some type of plant, or I may
20 attend the service, the services for the -- for
21 the fallen soldier, transitioned soldier.

22 Q. And is their name removed from any
23 membership list?

24 A. It is. I don't know if -- I don't know
25 where the removing part starts that, but it is.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

35

1 Q. So when a new member is added, does the
2 State Conference know about that?

3 A. No, not everyone.

4 Q. Do you know when the new membership of a
5 new member become effective?

6 A. It can become effective one of two ways,
7 at a regular general invited meeting, they can
8 become a member that day, or when they send the
9 application up to the national office, they become
10 a member then.

11 Q. I know previously you mentioned deceased
12 members being removed from a list. Are new
13 members added to a list?

14 A. I don't know, but I'm quite sure at some
15 point they are. I don't know at what point that
16 happens and who's responsible for that.

17 Q. Does the State Conference get periodic
18 membership updates from the National?

19 A. No, I don't because those things go
20 through to the branches. The branches would --
21 should get those lists. I don't.

22 Q. Do the branches send you periodic
23 updates on their membership?

24 A. They may not send me names. They might
25 send me numbers. So I -- I would look at -- I

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

36

1 wouldn't look at names.

2 Q. Do you compile those numbers?

3 A. Depends. Depends if we're getting ready
4 to go to the national convention or the state
5 convention.

6 Q. And those numbers they send to you, are
7 they numbers to be added, numbers to be removed?

8 A. No. They're just numbers.

9 Q. They're just numbers.

10 So what do you do with those numbers?

11 A. Well, if -- if there's a branch -- if
12 there's a branch, I look at the numbers because
13 the numbers -- they have to be above 50. So 50 is
14 their trigger number, that they're in
15 compliance -- at least in compliance with that
16 aspect. And so when we preparing for, you know,
17 the state convention, the national convention,
18 those numbers -- anything above 50 is a check, a
19 check mark because they're at least complying in
20 terms of membership.

21 Q. Okay. So do they just tell you there's
22 50 or do you personally -- or do they provide a --
23 a list of the 50 for you to check?

24 A. No, I never receive a list of anything
25 other than each branch may send me a -- their

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

37

1 number, how many -- how many persons they have on
2 their roll. And that -- for me, that means that
3 they're complying in terms of membership. That's
4 the only thing that that number there means.

5 Q. So just to be clear, you don't -- do you
6 do anything to verify that number?

7 A. No, I don't do anything to verify that
8 number.

9 Q. And how many members does the Louisiana
10 NAACP currently have?

11 A. You say the NAACP -- repeat that
12 question.

13 Q. The State Conference. Excuse me.

14 A. We don't have members, per se, because
15 we are the -- we are the -- for lack of a better
16 term, we're the corporate office for the state --
17 for the state of Louisiana. So we don't have
18 members. The members are made up in the branches.

19 Q. Okay. I see.

20 And do you know how many members of the
21 branches there are in Louisiana?

22 A. So if you're asking how many branches we
23 have statewide, from all the branches, probably --
24 the number's in the thousands.

25 Q. And the number of individual NAACP

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

38

1 members in the State of Louisiana, do you know
2 that number?

3 A. I haven't added the number up, but I
4 know it's in the thousands because we have --
5 because, you know, we have large branches and
6 there are small numbers. So the number, it's
7 all -- it's probably in the thousands, thousands
8 of members.

9 Q. And when you say "in the thousands," are
10 you relying on the representations of the branches
11 as to their numbers?

12 A. Yes. If -- if a branch tells me that
13 they have 50 or so -- and also, the national
14 office tells you. So between those two bodies,
15 safe to say that we're in the thousands.

16 Q. So just -- just so I'm understanding you
17 correctly, is it your testimony that the Louisiana
18 State Conference of the NAACP does not have any
19 members?

20 A. We have -- our members are branches,
21 they're not persons.

22 Q. Okay. And the -- and the thousands of
23 members, are all of those registered to vote, do
24 you know?

25 A. I don't know.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

39

1 MS. HOLT: I'd like to pull up a
2 document called the Amended Complaint, which
3 I would like to be marked as Exhibit 3,
4 please.

5 (Exhibit 3 was marked for identification
6 and is attached to the transcript.)

7 BY MS. HOLT:

8 Q. Okay. Mr. McClanahan, do you recognize
9 this document?

10 A. If you kind of let me see the entire
11 page, I can kind of give you --

12 Q. Sure.

13 MS. HOLT: If you can kind of scroll
14 through.

15 Q. And if you have a hard copy of the
16 Amended Complaint that you would prefer to look
17 at, that is completely fine.

18 A. Yes. Okay.

19 Q. And what is -- what is this document?

20 A. It's the Amended Complaint for
21 Declaratory Judgment and Injunctive Relief.

22 Q. Okay. Great.

23 And did you review this document in
24 preparation for your deposition today?

25 A. Yes.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

40

1 MS. HOLT: And if we can scroll up a
2 little bit on this first page or -- a little
3 more, so we can see the red font.

4 BY MS. HOLT:

5 Q. What is the date of this filing?

6 A. That'd be 4/4/22.

7 Q. Great.

8 And how did the Louisiana State
9 Conference become involved in this lawsuit?

10 A. We became involved in the lawsuit
11 because we represent the people of the state of
12 Louisiana.

13 Q. Can you explain that a little bit more.

14 A. Well, this is dealing with the
15 redistricting process and it said that 2021
16 redistricting cycle, in that we knew there were
17 going to be some shift in the boundaries. And so
18 we represent the entire state of Louisiana as the
19 NAACP. And when we realized that there may be
20 some illegal stuff going on in the State of
21 Louisiana -- Louisiana, whatever, we knew we had
22 to take action because the people demand that we
23 take action.

24 Q. And who made the decision to join this
25 litigation?

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

41

1 A. I did. I did.

2 We consulted with -- we consulted with
3 our -- with our Office of General Counsel and the
4 NAACP State Conference became a party to this
5 litigation.

6 Q. Did you consult with any other members?

7 A. Oh, every Monday -- every Monday night
8 we talk to members about actions that we take
9 throughout the state of Louisiana on various
10 issues, and this is one of them.

11 Q. So these Monday night calls, who can
12 attend those?

13 A. Members can attend. And if you're not a
14 member, you're -- you're a guest, and you have to
15 be brought in as a guest.

16 Q. Is there an attendance list?

17 A. No.

18 Q. So how do you determine if someone is a
19 member or a guest?

20 MS. ROHANI: Objection.

21 You can answer.

22 A. Well, the parties that control the --
23 it's -- they're via Zoom, so the party that
24 controls the Zoom would ask. And members that
25 they're familiar with, they'll let us know that

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

42

1 they are a member of this particular branch and
2 say they can come in.

3 Q. Did you consult with the president of
4 the local or any -- the presidents of the local
5 branches before bringing this lawsuit?

6 MS. ROHANI: Objection, to the extent
7 that this may seek information protected by
8 attorney-client privilege.

9 We just want to make sure that none of
10 the answers are from discussions or
11 conversations with counsel.

12 But you may answer.

13 A. When you say "consult," what do you mean
14 by "consult"?

15 Q. Did you talk to any of the presidents of
16 the local branches before filing this litigation?

17 A. I talked to some.

18 When you say "local branches," I'm
19 probably sure you mean the entire state, the state
20 of Louisiana. Because the local branch here is
21 Baton Rouge. I live in Baton Rouge. So that's
22 the local branch. And I spoke -- and there are
23 plenty of branches around us because there's
24 plenty of parishes. But I've spoken with many of
25 the membership and many of the leadership.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

43

1 Q. Okay. So the State Conference doesn't
2 have any members; right?

3 A. No. We have members, but our members
4 are the members of our branches.

5 Q. Yeah, the branches.

6 But did you ask any of the branch
7 presidents whether they consent to being a part of
8 this lawsuit?

9 MS. ROHANI: Again, objection, to the
10 extent that this seeks attorney-client
11 privileged information.

12 But you can answer.

13 A. Well, all -- all members, when they
14 happily join the NAACP and they -- they join us
15 because we have a -- a bright, rich history. And
16 there are many methods that we employ -- we talk
17 about this all the time, that we employ to achieve
18 our mission. And that we -- we have marches, we
19 have phone calls, we have rallies. We raise
20 awareness through various social media campaigns.
21 And then we have litigation. All members, when
22 they join the NAACP, consent to the NAACP's
23 mission and the various means that we employ to
24 achieve that mission.

25 Q. And I appreciate that, Mr. McClanahan,

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

44

1 but my question was: Did you ask any vice
2 president or -- excuse me, president of the local
3 branches whether they agreed to join this lawsuit
4 before filing this litigation?

5 MS. ROHANI: Objection.

6 You can answer.

7 A. Well, I -- I have during meetings,
8 quarterly meetings or our state convention, talked
9 about our involvement. They wholeheartedly say,
10 let's go, and let's win for the state of
11 Louisiana. And so to that extent, they all agree,
12 let's go.

13 Q. Okay. But you didn't specifically --
14 specifically ask whether a president consented to
15 this litigation before filing it?

16 MS. ROHANI: Objection.

17 You can answer.

18 A. If you're saying whether I spoke to one
19 or I spoke to all of them in global, I think I
20 spoke to all of them in global at a meeting.

21 Q. What meeting was that?

22 A. Probably quarterly meeting because we
23 have quarterly meetings. And then we have a state
24 convention. This is every year. And so
25 throughout the whole process we would talk about

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

45

1 the process that we're going to -- the many issues
2 that we were fighting throughout the state.

3 And one of the issues that will always
4 come up would be the redistricting process because
5 we -- we have our members to participate. And so
6 one thing that we talked about was at the end --
7 the end result would be the state of Louisiana is
8 going to do the right thing and pass fair maps;
9 and if they were not, what our next choice would
10 be. Everyone always agreed to what is our next
11 choice, and if we have to, we'll bring some type
12 of litigation.

13 Q. Mr. McClanahan, what is the relief that
14 the State Conference is seeking in this
15 litigation?

16 A. I'm so glad you asked.

17 You know -- you know, we would hope that
18 the relief that we're seeking is that the people
19 of the state of -- the people -- the great people
20 of the great state of Louisiana would have an
21 opportunity to elect candidates of their choice.
22 And we believe that we can get more state senators
23 and state representatives out of this
24 redistricting cycle than we have. And so we are
25 praying that you would go back to your -- your

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

46

1 client and tell him, Mike is right, let's go ahead
2 and do the right thing, agree to additional
3 senatorial districts and agree to additional
4 majority-minority representatives so we can all go
5 about our daily lives again.

6 Q. Well, Mr. McClanahan, my client is the
7 Secretary of State. Does he have any authority to
8 do what you're asking?

9 A. I don't know if he does, but his friends
10 are on the Legislature and so he can make calls
11 and say, look, I -- I've seen the writing on the
12 wall, the Lord has spoken to me, and we should be
13 about the right thing.

14 Q. Now, I believe you said a lot of people
15 of Louisiana to elect candidates of their choice.
16 What did you mean by "candidates of their choice"?

17 MS. ROHANI: Objection, to the extent it
18 calls for a legal conclusion.

19 Mr. McClanahan, you can answer.

20 A. Well, I do know --

21 MS. HOLT: Sara, I'm asking him what he
22 meant by a specific phrase that he used.

23 MS. ROHANI: Correct, but it is a legal
24 term, and so I just wanted to establish that
25 on the record.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

47

1 MS. HOLT: Okay. It's a legal term that
2 he used.

3 BY MS. HOLT:

4 Q. But you can -- you can answer that,
5 Mr. McClanahan.

6 A. Okay.

7 So we -- we do know that Louisiana is
8 made up of black folks. African Americans make up
9 a third of Louisiana. And so a third of
10 anything -- we just want that third. Whatever the
11 law says we're entitled to according to that
12 third. And so the way things are now, I don't
13 think we can get that third. And so -- in
14 anything. So we just want to make sure, through
15 this litigation, that we'll get that third
16 throughout the entire senate, state senate and
17 state house of representatives.

18 Q. So you said "entire." So does that
19 apply to the maps as a whole?

20 A. That third, whatever that third applies
21 to.

22 MS. HOLT: If we can turn to page 58.
23 Great.

24 Q. Mr. McClanahan, do you see where it says
25 "prayer for relief" at the top of this page?

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

48

1 A. Can you -- can you scroll so I can make
2 sure that it's page 58.

3 It doesn't say it.

4 Q. Yeah.

5 MS. HOLT: Please, if we can scroll up
6 or down, whichever.

7 A. Okay. All right.

8 Q. And I'll give you a minute to
9 familiarize yourself with this.

10 A. Okay.

11 Q. Okay. Do you see where it starts with,
12 "Wherefore, plaintiffs respectfully request that
13 the court..."

14 Did I read that correctly?

15 A. Right.

16 Q. Can you please read paragraph A out
17 loud, for the record.

18 A. "A, Declare SB1 and HB14 to be in
19 violation of Section 2 of the Voting Rights Act,
20 as amended, 52 USC, Section 10301."

21 Q. Is it your understanding that plaintiffs
22 want the court to declare the entire state senate
23 map illegal and in violation of Section 2?

24 MS. ROHANI: Objection. Again, calls
25 for a legal conclusion.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

49

1 But you can answer.

2 A. Yes. If SB1 is the senate map, yes.

3 Q. And if HB14 is the house map?

4 A. Yes.

5 Q. Okay.

6 MS. ROHANI: And then, Cassie, I
7 apologize, if there's a moment where we can
8 take a five-minute break whenever we're done
9 with this line of questioning.

10 MS. HOLT: Sure. I'm done with this
11 exhibit, and we can go ahead and take a
12 comfort break. We've been going for about an
13 hour.

14 (Recess in proceedings.)

15 MS. HOLT: So back on the record.

16 BY MS. HOLT:

17 Q. Mr. McClanahan, I wanted to clarify
18 something just so that I make sure we're on the
19 same page here as to the organizational structure.

20 Is the State Conference made up of the
21 branches?

22 A. Yes.

23 Q. Is the State Conference a corporate
24 entity?

25 A. No.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

50

1 Q. Okay. So it's not a 501(c)(3)?

2 A. We are a -- we are an association, a
3 member of the national association, and so our
4 status is 501(c)(4).

5 Q. Okay.

6 A. Based upon the association, the national
7 association.

8 Q. Great.

9 And are the branches separate entities
10 or separate 501(c)(4)s?

11 A. Yes.

12 Q. Okay. And we looked at the Amended
13 Complaint in this matter.

14 We don't need to pull it back up.

15 But do you remember when this litigation
16 was first brought?

17 A. In terms of the date and time and that
18 type of stuff you're asking?

19 Q. Does the spring of 2022 sound right?

20 A. Right. I think you -- I think it
21 said -- yeah, spring of 2022.

22 Q. Do you have a specific recollection of
23 any meetings with state branch presidents before
24 the spring of 2022?

25 A. I meet with -- I meet with the

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

51

1 leadership and the branches five times a year.

2 And so -- so we are talking about 2021? We met
3 five times that year.

4 And when you talk about spring, we
5 probably met at least once before the spring -- or
6 once during that part of the year.

7 Q. At any of those meetings, did branch
8 presidents give you permission to bring this
9 lawsuit?

10 MS. ROHANI: Objection.

11 You can answer.

12 A. Okay. So what happens is we talk about
13 a plethora of issues that we have. And one of
14 them was the redistricting process. And I -- I
15 asked them what was their pleasure. You know,
16 they said we employed the other methods, if they
17 don't work -- if the last method of litigation
18 works, let's go with litigation.

19 Q. Which branch presidents were present at
20 that meeting?

21 A. I don't know because I don't have
22 anything before me, but I'm quite sure it's a good
23 number of them, were present, their membership.
24 So we talked about it, and they agreed, just file
25 the lawsuit.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

52

1 Q. And when was -- was that one meeting
2 where they agreed?

3 A. No.

4 What happens is that I -- I probably
5 talk about the process along the way, as we were
6 talking about, you know, how -- how the
7 redistricting process was coming along. And so I
8 let them know every step of the way, via the
9 Monday night calls, what's going on.

10 And then we have our quarterly meetings,
11 I let them know also.

12 At our state convention, we were talking
13 about all of this.

14 And then -- and then I also, you know,
15 we would bring our lawyers, the greatest lawyers
16 this side of Heaven, they would give us updates.

17 And so, you know, when all else, you
18 know, looked like it was going to be a -- still a
19 lopsided, one-sided illegal victory, we brought --
20 we said -- the membership said, let's go ahead and
21 let's file a lawsuit.

22 Q. So when you say if the membership says,
23 what are you basing that off of?

24 A. When you say the memberships says, so I
25 talked to -- during our quarterly meetings, all

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

53

1 NAACP members get on -- are there via Zoom. I
2 think we were doing Zoom then. And so I would
3 have people from all over, as well as the
4 leadership.

5 At leadership meetings, the presidents,
6 the officers for the branches would be on those --
7 those Zoom calls. And we talk about issues that
8 we're dealing with throughout the whole state.
9 And one of -- I will always keep them informed of
10 what's going on with the redistricting here in
11 Louisiana as pertains to the Louisiana senate,
12 Louisiana house, as well as the congressional
13 lawsuit I forgot to talk about. I was involved in
14 that one also. We would talk about those.

15 And also the Supreme Court suit that
16 we're involved in. I would talk about all those
17 things to -- to the membership. And they
18 understand this is Louisiana and that -- and we
19 would have to ultimately file a lawsuit, and they
20 agreed.

21 Q. Did you take attendance at those
22 quarterly meetings?

23 A. I didn't. Maybe my staff -- I mean,
24 maybe, you know, the leadership -- maybe the
25 secretary or somebody would always get attendance,

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

54

1 but I didn't. I don't.

2 Q. Okay. And so you don't know if all of
3 the members or all of the presidents of the
4 branches were present at that meeting?

5 A. I don't, but it's done through a
6 democratic process.

7 Q. And those Monday Zoom calls, I believe
8 you said earlier there wasn't attendance at those;
9 is that correct?

10 A. I didn't hear the last part.

11 Q. There -- there was not attendance at
12 those monthly Zoom calls; is that correct?

13 A. When you say "attendance," you mean
14 attendance taken?

15 Q. Yes, sir.

16 A. No, not that I'm aware of.

17 Q. Okay. So you don't know if all of the
18 members were present on those Monday Zoom calls?

19 A. No. It would be hard to get all the
20 members present because, you know, you're talking
21 about thousands of people. But we have a good --
22 a good many persons on the calls.

23 Q. All right. Do you recall any specific
24 branch president on one of those month -- or one
25 of those Monday calls?

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

55

1 A. Do I remember one -- one branch
2 president? You asking --

3 Q. Yes.

4 A. -- for a particular name?

5 Q. I'm asking if you recall -- well, let me
6 scratch that. That's a -- that's a poor question.

7 Now, before the break we were discussing
8 the relief that the State Conference seeks in this
9 litigation. I'd like to clarify. I didn't
10 understand your definition of "candidate of
11 choice."

12 Can you explain that for me?

13 MS. ROHANI: Objection again, to the
14 extent it calls for a legal conclusion.

15 But, Mr. McClanahan, you can answer.

16 Q. Sure.

17 And just to be clear, Mr. McClanahan,
18 I'm referring to the phrase that you used, the
19 people of Louisiana to elect candidates of their
20 choice.

21 A. Okay.

22 What I was referring to is abundant --
23 abundant -- the way Louisiana -- the state of
24 Louisiana and its house and senate are structured,
25 that our options are limited to the very few that

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

56

1 they -- that they say we have to choose from. But
2 if those -- but if those districts were expanded
3 to include more persons that make up Louisiana,
4 black and brown people, other nationality, races,
5 we would get a greater mix of representation
6 throughout this whole legislative process --
7 throughout the whole Legislature.

8 Q. So is the candidate of choice a
9 particular race?

10 MS. ROHANI: Objection.

11 You can answer.

12 A. Not in this particular instance as
13 we're -- as I just told you, a candidate of
14 choice, because if a particular area was -- was
15 needed -- better representation or more diverse
16 representation, should I say -- then we hope that
17 the state of Louisiana would draw maps so that
18 persons could actually choose one of their own
19 choice.

20 Q. Sir, when you're referring to the
21 persons in various parts of Louisiana, who are
22 you -- who do you mean by that?

23 MS. ROHANI: Objection, vague.

24 You can answer.

25 A. Okay. So repeat the question. Just

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

57

1 repeat the question.

2 Q. Yeah. Sure.

3 So you've been referring to people in
4 specific parts of Louisiana and expanding their --
5 I believe you said the options are limited in
6 wanting to expand the mix. Who are those people
7 that you are referring to in that context?

8 MS. ROHANI: Objection.

9 Cassie, can we determine whether or not
10 that was the exact testimony of Mr.
11 McClanahan?

12 MS. HOLT: Sure.

13 MS. ROHANI: Would the court reporter
14 please read that back to us. Thank you.

15 (Record read back by Stenographer.)

16 MS. ROHANI: Thank you.

17 BY MS. HOLT:

18 Q. Okay. So, Mr. McClanahan, my question
19 was: Who do you mean by more persons?

20 MS. ROHANI: Objection.

21 You can answer.

22 A. Okay. Louisiana is made -- like New
23 York -- I think New York is the melting pot.
24 Louisiana is the gumbo pot. And the gumbo here in
25 Louisiana is made up of a whole lot of stuff

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

58

1 that's in there, right, that makes it good.

2 That's what makes Louisiana great.

3 And so if you look at black and brown,
4 if you look at the Asian population and others,
5 Louisiana has a great, rich culture and a great
6 race history. And so to have those at the
7 Legislature would be great, but -- but as it
8 stands, we just don't have those options because
9 they're limited.

10 You have -- I don't know of any Asian
11 that's in the Legislature. And I don't know of
12 any Hispanics that are in the Legislature. I'm
13 not saying in all of them. But I do know that we
14 would have a great gumbo if all of them were in
15 the Legislature.

16 Over rice, I might add.

17 Q. Fair enough.

18 Would -- so I believe you previously
19 mentioned before the break one-third. Does that
20 one-third include all the members of the gumbo pot
21 or specific members of that pot?

22 MS. ROHANI: Apologies. Objection.

23 You can answer.

24 A. I think -- I think the one-third
25 pertains to African Americans. Black folks make

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

59

1 up a third of the population of the state of
2 Louisiana.

3 Q. So for the Louisiana State Conference to
4 get the relief it seeks, would the maps need
5 one-third to elect black candidates of choice?

6 MS. ROHANI: Objection.

7 You can answer.

8 A. The one-third throughout the leg- --
9 throughout the redistricting of the legislative
10 process, yes, it would give us a greater --
11 greater options to elect candidates of our choice.
12 In this -- in this particular instance, should be
13 majority minorites, majority minorities, black
14 folks.

15 Q. So that's in -- the one-third, that's in
16 proportion to the overall black population of
17 Louisiana; is that correct?

18 A. Correct.

19 MS. HOLT: I would like to pull up a
20 document called "Plaintiff NAACP Louisiana
21 State Conference's Supplemental Responses..."

22 If the tech can pull that up, please,
23 and mark it as Exhibit 3.

24 REMOTE TECHNICIAN: I believe we're on
25 Exhibit 4 now.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

60

1 MS. HOLT: Oh, Exhibit 4. Excuse me.

2 (Exhibit 4 was marked for identification
3 and is attached to the transcript.)

4 REMOTE TECHNICIAN: Yes. The Amended
5 Complaint was Exhibit 3.

6 MS. HOLT: Thank you. Thank you.
7 Counting is not a lawyer's strong suit.

8 Okay. And if we can please scroll
9 through this entire document for Mr.
10 McClanahan.

11 BY MS. HOLT:

12 Q. Okay. Mr. McClanahan, do you recognize
13 this document?

14 A. Yes.

15 MS. HOLT: And if we can go back to the
16 top.

17 Q. And what is this document?

18 A. It is the Plaintiff, NAACP Louisiana
19 State Conference's Supplemental Responses and
20 Objections to Defendant Ardoin's First Set of
21 Interrogatories and First Set of Requests for
22 Production of Documents to the Organizational
23 Plaintiffs.

24 Q. Thank you. I know that's a long title.

25 MS. HOLT: If we can turn to the very

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

61

1 last page of this Exhibit 4, please.

2 BY MS. HOLT:

3 Q. Mr. McClanahan, do you recall signing
4 that verification?

5 A. Yes.

6 Q. So you understand that these responses
7 you've sworn to answer in the best of your
8 knowledge and belief?

9 A. Yes.

10 MS. HOLT: Now, if we can turn back to
11 the bottom of page 1. And if we can include
12 the top of page 2 in this view we're
13 looking -- yeah. Great.

14 Q. Mr. McClanahan, can you please read that
15 Interrogatory No. 3 to yourself and let me know
16 when you're finished.

17 A. Okay. Read the --

18 Q. Perfect.

19 A. -- first and the -- okay.

20 Q. Okay. Do you see part (a) there?

21 A. Right.

22 Q. And can you read that out loud for the
23 record.

24 A. "Identify the members of your
25 organization living in each challenged district."

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

62

1 Q. Thank you.

2 MS. HOLT: And if we can look down on
3 page 2 to the response. Great.

4 Q. Can you please read that first paragraph
5 in the response to paragraph (a). I'm sorry.
6 It's the second paragraph down under Supplemental
7 Response, starting with -- it starts with the
8 subsection (a).

9 A. Do I read it silently or out loud?

10 Q. If you can read it out loud for the
11 record, please.

12 A. "Plaintiff has identified at least one
13 member who resides in, among others, each of the
14 following Louisiana senate districts: 2, 5, 7, 8,
15 10, 14, 15, 17, 19, 31, 36, 38 and 39."

16 Q. Great. Thank you.

17 Is every senate district listed in this
18 response?

19 MS. ROHANI: Objection, calls for a
20 legal conclusion.

21 You can answer.

22 A. Now repeat your question again.

23 Q. Sure.

24 How many senate districts does Louisiana
25 have?

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

63

1 MS. ROHANI: Objection.

2 You can answer.

3 A. I don't know. Off the top of my head, I
4 don't know. I know --

5 Q. That's totally fine.

6 Do you see the number 1 in this
7 response?

8 A. I see 1 down by the house districts.

9 Q. Okay.

10 A. But I don't see nothing by the senate.

11 Q. So what I'm getting at is: Can we agree
12 that there are numbers missing between 1 and 39 in
13 this response?

14 A. Okay. All right. We can.

15 Q. So what does the Louisiana State
16 Conference mean when it says it has identified at
17 least one member?

18 MS. ROHANI: Objection.

19 You can answer.

20 A. Okay. It means that we have at least
21 one member living in these identified senatorial
22 districts, 2, 5, 7, 8, 10, 14, 15, 17, 19, 31, 36,
23 38, and 39.

24 Q. And how do you know that?

25 MS. ROHANI: Objection.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

64

1 A. Well, what we've done is looked at these
2 maps, the legal maps of the -- that were passed,
3 looked at the illustrative maps. And I'm from
4 Louisiana. I'm a -- I'm from north Louisiana, the
5 best part of Louisiana. It's Sabine Parish in
6 Zwolle, Louisiana. But I've been all over the
7 state of Louisiana as the NAACP State Conference
8 president. And as I -- as I cross-reference
9 these, I do know that we have members residing in
10 all of these -- these senatorial districts.

11 Q. Sir, I believe you testified earlier
12 that you don't receive any reports on membership
13 from the branches; is that correct?

14 A. I don't receive a report about member --
15 about membership, but I receive -- you know, they
16 tell me what they're doing. I receive -- I
17 receive activity reports.

18 Q. So how do you know the members or
19 what -- what members are in which house -- or
20 which senate district? Excuse me.

21 MS. ROHANI: Objection.

22 A. Okay. I'm a native. I'm a native
23 Louisianan. I've been all over the state.

24 I've gone to many of these parishes
25 where they have branches and they have Freedom

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

65

1 Fund banquets.

2 I've gone to many of these areas where
3 we've had to deal with police brutality.

4 I've gone to many of these areas where
5 we've had to deal with voter registration.

6 I've gone to many of these areas where
7 they've had an issue with school systems, the
8 desegregation suits.

9 I've gone to many of these areas where
10 we had to go talk to the senate -- the senator for
11 that particular area.

12 I've gone to many of these areas because
13 I've gone to the football games with members.

14 And we've had rallies at these various
15 places.

16 I've attended parades in these various
17 areas.

18 I'm familiar with leadership. I might
19 not be familiar with every member, but I'm
20 familiar with the leadership of those various
21 areas.

22 And so -- and sometime members come up
23 to me and say, Mr. McClanahan, how you doing, I'm
24 a member. I might remember that day. I might not
25 remember his face, but I remember I met them

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

66

1 there.

2 So I'm familiar with having members
3 in -- at least one member that reside in each one
4 of these questioned senatorial districts.

5 Q. Do you know those members' home
6 addresses?

7 MS. ROHANI: Objection, to the extent
8 that this is protected by attorney-client
9 privilege.

10 But you can answer.

11 A. I've gone to some of their homes. I
12 haven't -- probably haven't gone to all of them,
13 but I've gone to a lot of homes. And not only
14 eaten gumbo, but crackers. I'm telling you.

15 I was up in Cottonport last night.
16 That's right outside of Marksville, right.

17 And I've gone to those places and I've
18 sat down.

19 And I've also attended funerals.

20 But I might not have gone to each home,
21 but I've gone to enough of them to understand that
22 we have members that reside there.

23 Q. So let me -- let me try it this way. So
24 do you see how it lists Senate District 2?

25 A. Yes.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

67

1 Q. The member identified in that
2 district -- I'm not asking for their identity, but
3 do you know their home address?

4 MS. ROHANI: Objection.

5 A. I know they live there, yes.

6 Q. How do you know that?

7 A. Because I've already looked at that
8 particular area, and I know we have at least one.
9 I might not know every one at -- at that
10 particular senatorial dist- -- address, but I know
11 at least one of the membership that stays in that
12 area. And I know -- I've been to the homes. I've
13 been -- most of these homes I've been to.

14 And Louisiana is a welcoming state.
15 We -- we love to bring you in, watch some LSU,
16 southern football and eat some barbecue and some
17 dirty rice and some -- so I've been to many of
18 those homes. And so I -- I can get to most of
19 their homes from -- just on memory alone.

20 Q. Okay. Now, Mr. McClanahan, I'm -- I'm
21 not doubting that you go to certain members'
22 homes.

23 What I'm getting at is: This response
24 says that plaintiff has identified at least one
25 member who resides in Senate District 2. Now, I

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

68

1 want to know how you know that.

2 MS. ROHANI: Objection.

3 You can answer.

4 A. Okay. So as I alluded to earlier, the
5 senate districts are a whole lot larger than the
6 house representative districts, right. So I do
7 know, based upon looking -- and looking at the
8 maps that have the parishes -- Louisiana has
9 parishes, not counties. So looking at the
10 parishes, cross-referencing them with our
11 branches, where our branch is located, it's easy.
12 I know that easily, that we have branches in and
13 the members that make up the branches in these
14 particular senatorial districts.

15 Q. Does "member" mean member in good
16 standing?

17 MS. ROHANI: Objection.

18 A. Either you're a member or you're not.
19 Either you're a member -- paid dues member or
20 you're not. I don't know if there's a quasi -- a
21 place where members go until they get in good
22 standing. I'm not aware of anything like that.
23 So if your \$30 paid up, then I want
24 everybody on the call, on this Zoom, that paid
25 their \$30 to become a member of the oldest and the

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

69

1 boldest civilized organization in the country.

2 Q. So how did you verify that the
3 identified member was, in fact, a member?

4 MS. ROHANI: Objection.

5 I want to make sure that none of these
6 answers Mr. McClanahan gives invites
7 discussions or consultation with counsel, he
8 or the NAACP had with counsel.

9 A. Repeat your question.

10 Q. Sure.

11 So how did you verify that the
12 identified member in Senate District 2 was
13 actually a member of the NAACP?

14 A. Well, I do know that we have at least
15 one member -- several members. And so I looked at
16 the -- I know the leadership of the various
17 branches, and I know that somebody from the
18 leadership lives in that area. And if they're not
19 part of the leadership, then the branch would know
20 because national would tell them that, you know,
21 this -- this person or that person cannot be part
22 of the leadership because they're not a member.
23 But I haven't -- I haven't gotten anything saying
24 that the leadership as the branch has it is not in
25 good standing.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

70

1 So when I look around and go to these
2 places, I speak to the presidents, vice
3 presidents, or some -- somebody in leadership.
4 And they're situated, living in these questioned
5 senatorial districts.

6 Q. Mr. McClanahan, did you have a
7 conversation with a local branch president whose
8 jurisdiction covers Senate District 2 before this
9 litigation?

10 MS. ROHANI: Objection.

11 Apologies, Cassie.

12 A. Okay. So what I've done, you know, I
13 have these calls, the quarterly meetings, I have
14 the state convention, and we talk about issues
15 that affect them.

16 So we know -- we know that, once we
17 talked about how the state looks like, they were
18 going to -- going to vote. We decided as a group.
19 And it included members from all of these
20 questioned senatorial districts. And we -- we
21 decided as a group, as a -- to -- to agree to a
22 lawsuit.

23 Q. Mr. McClanahan, I'm a little confused
24 because I believe you testified that you don't get
25 membership lists and that you rely on the local

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

71

1 branches to tell you about their members. But how
2 do you -- how do you know, then, what members
3 actually reside in which senate districts?

4 How did you identify those particular
5 members?

6 MS. ROHANI: Objection.

7 Again, I want to make sure that, Mr.
8 McClanahan, the answers you give invite [sic]
9 conversations you've discussed with counsel,
10 including General Counsel.

11 A. As I alluded to you before, I looked --
12 I cross-referenced the legal maps, the
13 illustrative maps with the membership. The
14 state -- the state map had -- with the parishes in
15 it, right, with the parishes. And I
16 cross-referenced that. And I've been to many of
17 these places, and I know the membership and I know
18 the leadership. And they're there, at least one
19 or two.

20 And I know the leadership. That means
21 the president, vice president, secretary,
22 treasurer, the various vice presidents are in
23 those areas. I know that. I know that. I've
24 been to their homes and I know -- I know this area
25 well. I know the terrain of Louisiana, if I don't

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

72

1 know anything else.

2 Q. Okay. Now, you said you
3 cross-referenced the map. Did you cross-reference
4 the map of the membership list?

5 A. I --

6 MS. ROHANI: Objection.

7 THE WITNESS: Go ahead.

8 MS. ROHANI: Objection.

9 Please go ahead and answer.

10 A. I cross-referenced the maps with -- with
11 the -- with the vice president and those areas
12 that they represent, the vice president. So
13 the -- so the maps would have the parish. Because
14 that, based upon my knowledge -- I know for a fact
15 that I've been in those towns and I've sat down at
16 those tables. And I know for a fact that I was in
17 2, 5, and I got calls from members in 14 and 15.
18 And I've attended funerals in 38, 39. All over
19 the state of Louisiana I've been. And I've sat
20 down and I've talked to members. And we've
21 rallied together in all of those senatorial
22 districts in question.

23 MS. ROHANI: Counsel, I would like to
24 ask for a quick five-minute break, if
25 possible.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

73

1 MS. HOLT: Okay. We can certainly do
2 that.

3 Would you like to meet back -- I guess
4 we're about -- we can go ahead and do a
5 little bit longer than five because every
6 time I look at the clock, it keeps going up.
7 You want to do 11:55?

8 MS. ROHANI: That's fine.

9 MS. HOLT: 10:55 your time.

10 MS. ROHANI: That's fine.

11 We just need to clarify. We think
12 there's an issue with the attorney-client
13 privilege. That's fine.

14 MS. HOLT: Okay. Do you need to consult
15 with -- well, no. I'll -- that's totally
16 fine. All right.

17 MS. ROHANI: We'll be back at 11:55.

18 (Recess in proceedings.)

19 BY MS. HOLT:

20 Q. Mr. McClanahan, before the break --

21 MS. HOLT: And if we could bring back up
22 Exhibit 4, please.

23 Thank you.

24 Q. Mr. McClanahan, before the break we were
25 talking about the second paragraph there regarding

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

74

1 the identification of members in Louisiana senate
2 districts.

3 And do -- do you see the senate
4 districts identified in 3(a), Mr. McClanahan?

5 A. Yes, I do.

6 Q. Did you review any list or document with
7 addresses and names to verify that a branch member
8 lives in each of these districts?

9 A. I didn't -- I didn't look at a list. I
10 didn't have a list. But I do know, and -- and in
11 reviewing this, talked with my lawyers and we took
12 the legal maps and illustrative maps, put
13 together. And based upon our conversations -- and
14 I told them that I've been all over these places,
15 and I could identify where members live in these
16 particular senatorial districts.

17 Q. Did you speak with any branch leaders
18 for the purpose of identifying these districts?

19 MS. ROHANI: Objection.

20 You can answer.

21 A. Did I speak to any -- any leadership
22 about the districts?

23 Q. Any branch leaders.

24 A. What do you mean, "speak with" them?

25 Q. Did you ask any branch leaders whether

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

75

1 they had been a member and residing in each of
2 these senate districts?

3 MS. ROHANI: Objection.

4 You can answer.

5 A. Well, besides going to these branch --
6 branches, branches and branch meetings, I know for
7 a fact because I've been to all of them. There's
8 probably not too many branches I haven't visited.
9 And I visited all of these. I know the
10 leadership.

11 And in preparing for this, I speak with
12 my lawyers. I know these. I know this. We have
13 members there. We have branches there in these
14 districts and these areas. And -- and the
15 membership's excited about being a part of the
16 NAACP.

17 Q. So I don't believe you answered my
18 question there.

19 I -- I asked if you spoke with specific
20 branch leaders for the purpose of answering this
21 interrogatory.

22 MS. ROHANI: Objection.

23 You can answer.

24 A. I -- I may have spoke with some, but may
25 have spoke with all. But a good many of them, in

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

76

1 terms of our Monday call, in terms of our
2 quarterly meetings, in terms of our state
3 conventions about -- about this litigation. And,
4 you know, they all agreed that we have members in
5 these districts. I know for a fact they have
6 members in these districts. I've been there.

7 And so in terms of the leadership, we
8 know that there's -- somebody lives in each one of
9 those districts from the leadership team.

10 Q. Now, you just said we know individuals
11 live in each of those districts from the
12 leadership team.

13 What particular conversations did you
14 have or documents did you review to come up with
15 that conclusion?

16 MS. ROHANI: Objection, again, with
17 respect that it seeks information covered by
18 attorney-client privilege.

19 But, President McClanahan, anything
20 that's not, you can feel free to answer.

21 A. Well, I do know that I've been to and
22 having these -- all these quarterly meetings,
23 quarterly meetings and conventions, going to all
24 of these Freedom Fund banquets, going to these
25 galas in every -- these towns, in these -- I do

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

77

1 know that we have somebody there. And in talking
2 to -- on the calls about this litigation,
3 preparing them for as we go down toward the end of
4 this litigation, I'm aware of members that stay in
5 each one of these districts.

6 Q. Are those members black?

7 A. Our membership is diverse.

8 Q. Yes, but you said you're aware of
9 members in the specific district.

10 Is the member that you're aware of
11 black?

12 A. It all depends. It all depends on where
13 the senatorial district is located at.

14 Q. Okay.

15 A. But most of it's black.

16 Q. So the member that you say you
17 identified for Senate District 2, is that member
18 black?

19 A. I probably -- identify it in my head,
20 probably 2. And yes, that one's probably black.

21 Q. How do you -- you said "probably." What
22 do you -- what do you mean in your -- in your
23 head? What do you mean by "probably" and in your
24 head?

25 A. Because our membership is diverse. I

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

78

1 was at a meeting on -- last night where the
2 members were -- where two or three of the members
3 were white. And so it's -- you know. So -- and
4 Louisiana is diverse. And so our membership also
5 refers diversity. And so I can't assume that the
6 member's going to be black because he could have
7 very well been white.

8 Q. Okay. Do you know if that member is
9 registered to vote?

10 A. No, I don't.

11 Q. And would your answer -- I asked you
12 specifically about Senate District 2. Would your
13 answer be the same for the other senate districts
14 listed here?

15 A. Probably so.

16 Q. Okay. So this response to part (a)
17 regarding the senate districts, is that based on
18 your own personal knowledge?

19 A. If I would have to say an answer, yes.

20 Q. I'm sorry, I didn't hear that first
21 part.

22 A. Yes. Yes, it's based upon my personal
23 knowledge, and it's based upon me talking with the
24 lawyers and me looking at the maps, the
25 illustrative maps, me looking at the illegal maps

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

79

1 that we looking -- I know where I've been and
2 where the membership resides through the state --
3 the state of Louisiana, yes.

4 Q. Mr. McClanahan, who is that member who
5 live -- who's been identified who lives in Senate
6 District 2?

7 MS. ROHANI: Objection.

8 Direct not to answer.

9 Q. Mr. McClanahan, who is that member who
10 has been identified who resides in District 5?

11 MS. ROHANI: Objection.

12 Direct not to answer.

13 MS. HOLT: And, Sara, is your
14 instruction going to be the same for every
15 senate district on this list?

16 MS. ROHANI: Correct.

17 I just want to clarify that there was a
18 motion to compel filed in order to get this
19 information already, and it was denied. So
20 these are questions that shouldn't be asked
21 in this deposition. It's really improper to
22 even ask that.

23 MS. HOLT: Sara, we intend to challenge
24 that.

25 And in addition, the motion -- the

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

80

1 denial of the motion to compel didn't say
2 that we couldn't ask these questions at
3 30(b)(6).

4 MS. ROHANI: It is still -- at this
5 current point, it was denied.

6 You -- it's not appropriate to be asking
7 personally-identifiable information from the
8 president.

9 MS. HOLT: Sure. And I understand that
10 it's been denied. I need to ask these
11 questions to create a record, and it is a
12 topic in the 30(b)(6) notice.

13 MS. ROHANI: I just want to get on the
14 record that it is improper to even ask. This
15 is based on First Amendment privileges, and
16 my answers will be exactly the same for every
17 single district.

18 MS. HOLT: And is your objection going
19 to be the same for Senate District 15?

20 MS. ROHANI: Yes.

21 MS. HOLT: Even though Mr. McClanahan
22 lives in Senate District 15?

23 MS. ROHANI: Yes.

24 MS. HOLT: Okay.

25

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

81

1 BY MS. HOLT:

2 Q. All right. So let's now go to that
3 second paragraph of this response.

4 Mr. McClanahan, can you please read that
5 out loud, for the record?

6 A. "Plaintiff has identified at least one
7 member who lives in, among others, each of the
8 following Louisiana House Districts: 1, 2, 3, 4,
9 5, 6, 7, 8, 9, 13, 22, 25, 27, 34, 35, 36, 37, 47,
10 57, 58, 59, 60, 61, 62, 63, 65, 66, 67, 68, 69,
11 70, 80, 88, and 101.

12 Q. Thank you, Mr. McClanahan.

13 Is that -- do you know how many house
14 districts Louisiana has?

15 A. No, I don't. Not off the top of my
16 head.

17 Q. Let's see. Do you see number 10 in this
18 response?

19 A. No, I don't.

20 Q. So is it fair to say that not all the
21 Louisiana house districts are listed in this
22 response?

23 A. Right.

24 Q. Okay. Now, did you review any list or
25 documents with names and addresses to verify that

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

82

1 a member lives in each of these house districts?

2 A. I didn't have a list.

3 Q. Okay. What did you have?

4 MS. ROHANI: Objection.

5 Q. You can answer, I believe.

6 MS. ROHANI: No. Direct not to answer.

7 MS. HOLT: Direct not to answer? Okay.

8 MS. ROHANI: Yeah. It's confidential.

9 MS. HOLT: Okay.

10 BY MS. HOLT:

11 Q. On -- Mr. McClanahan, do you have
12 personal knowledge of at least one member
13 identified in each of these house districts?

14 A. Yes.

15 Q. And how do you know that?

16 MS. ROHANI: Objection.

17 Direct not to answer.

18 MS. HOLT: Sara, I'm a little confused.

19 MS. ROHANI: My apologies, Cassie. I
20 merely object to the extent that this may be
21 covered by attorney-client privileges;
22 however, Mr. McClanahan can answer how. My
23 apologies.

24 MS. HOLT: Okay.

25 A. Okay. Well, as I alluded to you in the

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

83

1 answer to (a), that I'm a native Louisianan. How
2 I travel this whole state, bad roads and all, and
3 I looked at the illustrative maps, I looked at the
4 illegal maps, and I know -- I know that we have
5 members in the house district because the house
6 district is smaller than the senatorial district.

7 So we eat, watch football games. We go
8 to festivals. We go to Freedom Fund banquets. I
9 go to protest police brutality. We go to stand in
10 the school district or -- or kicking our kids out
11 of school for literally nothing. I go there to
12 test medication or -- or healthcare, inadequate
13 healthcare. I've been to these areas and I've
14 stood with members. Stood with members in all of
15 these areas.

16 And so I know, based upon looking at the
17 illustrative maps, looking at the illegal maps,
18 and just knowledge of Louisiana, talked with our
19 lawyers, knowing that we have a plaintiff -- we've
20 identified at least one member in each one of
21 these house districts.

22 Q. Mr. McClanahan, how many house -- do you
23 know how many house districts Baton Rouge has?

24 A. I don't, not off the top of my head.

25 Q. Sure.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

84

1 Is it more than one?

2 A. Yes.

3 Q. How did you verify that at least one
4 member lives in at least two house districts in
5 Baton Rouge?

6 MS. ROHANI: Again, objection, to the
7 extent that there are maybe privileged
8 communications.

9 However, President McClanahan, you can
10 answer.

11 THE WITNESS: Okay.

12 A. You say Baton Rouge?

13 Q. Yes, sir.

14 A. I used to be Baton Rouge vice president,
15 so I know for a fact that we have at least one or
16 two members living in each of the house districts
17 in Baton Rouge area.

18 Q. How do you know that those members
19 didn't move?

20 A. I live in Baton Rouge. I know them
21 personally.

22 Q. Okay.

23 A. On more times than not I've been to
24 their house. And then I've probably helped fix
25 their house, repair their house.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

85

1 Q. Okay.

2 A. You know, we've been through floods and
3 all that, hurricane. So I've been there. I've
4 been the president -- when I was branch
5 president -- branch president, that they can call
6 on me to also pray for them and to welcome them,
7 you know, when they have bursts and to help grieve
8 with them when they've had losses.

9 So I've been to many of the houses.
10 Been on the Southern University branch. I've been
11 to these homes and cheered on the Jaguars. Been
12 to these homes to cheer on the Tigers. And so
13 we're familiar with those here in the Baton Rouge
14 area in the house districts.

15 Q. When you go to a home, do you know which
16 house district you're in when you visit?

17 A. Probably so.

18 Q. Probably so?

19 A. Probably so. In the State of Louisiana,
20 probably. And in Baton Rouge, probably so.

21 Q. Now, there's -- there's other house
22 districts listed outside of Baton Rouge in this
23 response; is that correct?

24 A. Yes.

25 Q. Did you speak with any branch leaders

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

86

1 for the purposes of verifying this interrogatory
2 as to the house districts?

3 MS. ROHANI: Objection.

4 You can answer.

5 A. Okay. You know, I've spoke with
6 leadership all over the state through the various
7 means I alluded to earlier. And the response
8 would be the same because, you know, I know, and
9 they would tell me in these various house
10 districts. And so I'm confident that I've spoken
11 with, or they made their voices known. And so
12 they agreed with what we're doing.

13 Q. Did you have a specific meeting with a
14 specific branch president --

15 MS. ROHANI: Objection --

16 Q. -- about these house districts?

17 MS. HOLT: Oh. I apologize, Sara.

18 MS. ROHANI: My apologies, Cassie. I
19 keep doing that.

20 Objection.

21 But you can answer.

22 A. I've had conversation with a number of
23 members about -- about the -- about the methods we
24 were about to employ and the various issues that
25 we deal with. And the leadership, which reflects

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

87

1 the membership, agrees that we should employ these
2 methods on these various house districts.

3 So I've spoken to them individually, but
4 they speak in global. When they speak through --
5 the membership speak through the leadership.

6 Q. But that -- there wasn't a specific
7 conversation with a branch leader. That was my
8 question.

9 A. If there was, I don't remember. Because
10 a lot of times when we -- when we have these
11 various meetings, these various calls, they'll
12 speak out; they want to be part of this. And so
13 sometimes they're speaking for themselves
14 individually, but -- but when they speak, they
15 speak as -- as a head, so they represent the whole
16 branch.

17 Q. So for the house districts that are in
18 other parts of the state, like New Orleans, how do
19 you -- how did you identify a member who lived in
20 that specific house district?

21 MS. ROHANI: Objection.

22 You can answer.

23 A. Well, I'm a Louisiana native. And I've
24 lived in New Orleans also. And I've known -- I've
25 known each president, branch president of Orleans

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

88

1 for the last -- probably the last ten -- ten
2 years. And I've sit with them all. I know New
3 Orleans pretty good now. So, you know, I've spoke
4 with the leadership and the membership when I
5 was -- then.

6 I used to be the administrator for the
7 entire branch. That means when they're -- when
8 the branch president was in between. And so I've
9 spoken with them. And I -- I know Orleans. And I
10 can say that I've spoken to -- not individually,
11 as the administrator. But also in speaking with
12 the membership about -- about this. And we have a
13 member, at least one member in each one of
14 these -- this house district in New Orleans in
15 question.

16 Q. Mr. McClanahan, when did you speak with
17 the New Orleans branch president about this case?

18 MS. ROHANI: Objection.

19 A. I don't know a -- if you're asking for a
20 specific date and time, I'm not that good. I'm
21 sorry. But I spoke with him because he gets on
22 our Monday calls, too. And he and I are friends.
23 I speak with him regularly.

24 Q. Okay. Now, Mr. McClanahan, sitting here
25 today, can you identify which house districts are

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

89

1 within New Orleans?

2 A. I'm not -- I'm not that good. I
3 don't -- I don't even know where my kids' rooms
4 are in my own house.

5 Q. Do you know if any of the members
6 identified in these house districts are registered
7 voters?

8 A. No, I don't.

9 Q. Do you know if they are black?

10 A. No, I don't. Because the membership is
11 diverse. And then when you talk about Orleans,
12 you're talking about really diversity, so I
13 wouldn't know.

14 Q. Okay. Now, let's see, house district
15 or -- yeah, House District 1, who is the member
16 who you identified that lives in House District 1?

17 MS. ROHANI: Again, objection.

18 Direct not to answer.

19 MS. HOLT: All right. And, Sara, is
20 your objection and instruction going to be
21 the same for every house district --

22 MS. ROHANI: Yes, ma'am.

23 MS. HOLT: -- listed here?

24 MS. ROHANI: Yes, Cassie.

25 MS. HOLT: All right.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

90

1 So if we can go to the very last
2 paragraph -- oh, we don't need to scroll. I
3 apologize. That's just -- my eyes need to go
4 down.

5 BY MS. HOLT:

6 Q. All right. Mr. McClanahan, can you
7 please read this last paragraph out loud for the
8 record.

9 A. "Plaintiff has identified at least one
10 member who would reside in each of the newly
11 created majority-Black districts or the newly
12 unpacked majority-Black districts in Bill Cooper's
13 June 2023 illustrative plans, including, among
14 others, illustrative House Districts 1, 3, 4, 29,
15 34, 38, 57, 58, 60, 61, 63, 65, 68, 69, and 101,
16 and illustrative Senate Districts 2, 7, 15, 17,
17 19, 38, and 39."

18 Q. Thank you, Mr. McClanahan.

19 And some of these questions are going to
20 be the same as the previous sections.

21 But how did you identify a member that
22 lives in these illustrative districts?

23 A. Well, being a native Louisianan, I
24 looked at the illustrative maps, looked at the
25 illegal -- illegal maps, and I know the areas,

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

91

1 spoke with my -- my lawyers, and I know these
2 areas and I know the membership that lives there.
3 And it was easy for me to identify where branches
4 are, where the leadership lives, and members live
5 in these particular districts.

6 Q. Did you review any other documents to
7 make that determination?

8 A. I didn't have a list or anything.

9 I spoke with my lawyers. We got
10 together, and -- and I know -- I looked at the
11 illegal maps, which was the -- I looked at the
12 illustrative maps and, you know, came to the
13 conclusion, based upon the -- the membership,
14 based upon our -- where our branches are located.
15 We came to the conclusion.

16 I've been in these areas. I've been in
17 these homes. I've been in these football
18 stadiums. I've been in these courtrooms. I've
19 been here and I've been there. I've eaten here
20 and I've bought from here.

21 And so we came to the conclusion that we
22 have persons -- because when I would go there, I
23 wouldn't go there by myself. I would go there at
24 the request of the membership. I would go there
25 at the request of the leadership.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

92

1 Q. So is it fair to say that this response
2 is based off your personal knowledge?

3 A. Based upon my personal knowledge, and
4 it's based upon the information that the lawyers
5 and I talked about.

6 Q. And did you speak with any branch
7 presidents to identify members that live in these
8 illustrative districts?

9 MS. ROHANI: Objection.

10 But you can answer.

11 THE WITNESS: Okay.

12 A. So when I would have these quarterly
13 meetings and these state conventions and we would
14 talk about what's -- so I would keep them updated,
15 right. And we would talk about these districts.
16 Literally talk about these districts. And based
17 upon me talking to them about this -- this
18 litigation, about where we're headed with
19 litigation, we all agree -- they agreed with me
20 that we have somebody who lives in each one of
21 these districts in question.

22 Q. Did you show them Mr. Cooper's
23 illustrative districts?

24 MS. ROHANI: Objection.

25 You can answer.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

93

1 A. I didn't show them, per se, but we
2 talked about the districts, the numbers
3 themselves. I probably didn't have the map to
4 show them. If I did, I didn't have -- you know, I
5 didn't pull it up on a particular screen or
6 anything like that. But we talked about the areas
7 in question, as you talk about Orleans, as you
8 talk about Baton Rouge. It's easy for me to say
9 that to them, East Baton Rouge, Orleans Parish, or
10 Caddo Parish or Sabine Parish.

11 Q. Do you know if any of those members
12 identified are registered to vote?

13 A. No, I don't.

14 Q. Do you know if any of those members
15 identified are black?

16 A. Yes.

17 Q. How do you know that?

18 MS. ROHANI: Objection.

19 You can answer.

20 THE WITNESS: Okay.

21 A. Because in talking with some of them, or
22 two or three of them, they identify as black
23 because I know them personally.

24 Q. And who are those members?

25 MS. ROHANI: Objection.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

94

1 Direct not to answer.

2 BY MS. HOLT:

3 Q. Mr. McClanahan, so your sworn testimony
4 today is that you have identified members in each
5 of the districts listed in this interrogatory
6 response; is that correct?

7 A. If the document you're talking about is
8 the one that I signed, yes.

9 Q. Are you aware if any court cases or
10 local branches of the NAACP have been compelled to
11 produce member names?

12 MS. ROHANI: Objection.

13 But you can answer.

14 A. I'm not, because the NAACP is a vast
15 organization, so I wouldn't be aware of that kind
16 of stuff.

17 Q. All right.

18 MS. HOLT: We are done with this exhibit
19 for now.

20 And I'd like to pull up a document
21 called "NAACP's Responses to Defendant's
22 First Set of Discovery," which we -- I would
23 like to have marked as Exhibit 5, please.

24 (Exhibit 5 was marked for identification
25 and is attached to the transcript.)

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

95

1 MS. HOLT: And if we can scroll down for
2 Mr. McClanahan so that he can review this.

3 BY MS. HOLT:

4 Q. Now, Mr. McClanahan, from what you've
5 seen so far, are you familiar with this document?

6 A. Yes.

7 MS. HOLT: And if we could scroll back
8 up to page 1, please. Great.

9 Q. And do you understand this document to
10 be NAACP Louisiana State Conference's Responses
11 and Objections to Defendant's First Set of
12 Discovery?

13 A. Yes.

14 Q. Okay. I shortened the title there a
15 little bit for you.

16 A. All right.

17 Q. All right.

18 MS. HOLT: And if we can turn to the
19 very last page of this document, please.

20 Q. Okay. Mr. McClanahan, do you recall
21 verifying these interrogatory responses?

22 A. Yes.

23 Q. All right.

24 MS. HOLT: And if we could please turn
25 to page 7. Okay. Let's see. And actually,

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

96

1 if we can -- sure. If we can scroll back up
2 so Mr. McClanahan can actually see the
3 question. I believe they're on page 6. Oh,
4 no, a little bit further. There we go.

5 BY MS. HOLT:

6 Q. Interrogatory No. 2. Mr. McClanahan,
7 I'll let you review this Interrogatory No. 2, and
8 please let me know when you're finished.

9 A. Okay.

10 Q. Great.

11 MS. HOLT: Now if we can please turn to
12 page -- back to page 7.

13 Q. And, Mr. McClanahan, do you see the very
14 last paragraph at the bottom of the page, it
15 starts with, "In addition..."?

16 A. Yes.

17 Q. Okay. Could you please read that out
18 loud, for the record?

19 A. "In addition, plaintiff intends to call
20 a number of fact witnesses. The specific fact
21 witnesses plaintiff will call have not yet been
22 determined but will likely include Louisiana NAACP
23 president, Michael McClanahan. Mr. McClanahan's
24 testimony will include information about the
25 Louisiana NAACP's activities and mission, the harm

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

97

1 to the organization, its members, and Black
2 communities in Louisiana caused by the enacted
3 maps, the lack of responsiveness of elected
4 officials in addressing issues faced by Black
5 Louisianans, and other topics relevant to
6 Plaintiffs' claims. The other plaintiffs in the
7 case will also likely testify, including
8 representatives from the Black Voters Matter Fund
9 and the individual plaintiffs. Other witnesses
10 Plaintiff may call will be identified as their
11 identities are determined and in accordance with
12 the pre-trial schedule and Plaintiffs' discovery
13 obligations."

14 Q. Thank you, Mr. McClanahan.

15 I didn't want to interrupt you, but
16 we -- we could have stopped it at "claims."

17 I'm going to ask you a few questions
18 about the first part of that paragraph.

19 What harm has the Louisiana State
20 Conference suffered as an organization as a result
21 of the enacted maps?

22 MS. ROHANI: Objection.

23 But you can answer.

24 A. Okay. What we've had to do since the
25 enactment of these illegal maps is that we have

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

98

1 had to shift our -- our -- our action plan, for
2 lack of a better term. You know, we had to get
3 geared up during the -- during the time from the
4 census through the Road Shows, the legislative
5 Road Shows to the legislative sessions. And so we
6 had members get up because the -- because when the
7 census came back, it identified that we had --
8 that we had gained population, black population,
9 in certain areas. We're excited about that
10 because we knew that we were going to get some
11 additional majority-minority representatives. And
12 so when the -- when the house passed the illegal
13 maps, the areas that we were shifting to do the
14 work in and keep going, because these areas were
15 going to get excited about having a representative
16 of their choice, possibly somebody who looks just
17 like them, and when that didn't happen, we had to
18 shift the resources and manpower to -- to take
19 into account that this area that we thought was
20 gonna have a -- probably a black representative or
21 an Asian, if that was the case -- excuse me, or
22 Hispanic, if that was the case, would no longer
23 have that.

24 And we were having radio spots already
25 getting ready to be cut. And we were doing

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

99

1 trainings to get people excited about going to
2 these particular areas and talking about, finally,
3 Louisiana got it right this time.

4 But, no, we had to say that Louisiana is
5 still Lousyana because it's going to keep us in
6 bandage. And so we suffered not only because the
7 people were emotionally distressed, but having to
8 redirect manpower and resources to these areas.

9 It makes our work a little bit harder
10 because it's easier to get you excited about
11 something that you know is coming your way. It's
12 easier. But it's a lot bit tougher to get you
13 excited about something that you know should have
14 happened but you will tell me, "I told you that
15 things were not going to change in Louisiana."

16 You have that mindset. It's really
17 tough for me to get you excited about just wanting
18 to participate in the process because you know the
19 process is not -- is not kin to you, is not liken
20 to you. The process -- we know that in Louisiana,
21 the good ol' boy still wins out.

22 "The good ol' boy still wins out; power
23 does not concede power," those are the things that
24 I would hear. And how would I combat that? And
25 how would I combat that? I would have to pray all

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

100

1 the time, just pray all the time that we -- that I
2 be given encouragement, that I could encourage my
3 members to go in these areas in Louisiana to talk
4 about we're trying to -- we're trying to -- the
5 process is still going to work, we just have to
6 keep the faith. And that's tough, trying to tell
7 somebody to keep the faith and you just slapped
8 them in the face. It's tough.

9 It's tough going into these areas and
10 saying, look -- I think Sam Cook says, "If changes
11 don't come, can't stay in that zone, can't sit on
12 the dock of the bay, can't do that." So it's a
13 little bit tougher.

14 When you talk about harm to the -- to
15 the State Conference, people would tell me, "Man,
16 y'all lying, y'all are not good." It damaged our
17 reputation because I'm getting geared up, I'm
18 pumping them up. We'd like to do right -- for
19 once in Louisiana's history, we're about to do
20 right. Once. We're about to get this right.

21 And I was saying it all along because I
22 have faith in Louisiana. I have faith in the
23 members in the House and members in the Senate. I
24 have faith in them. And I would tell people
25 throughout the state, just watch, you're going to

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

101

1 have somebody that you like, get ready. You ready
2 to run? Let's get you ready to run. Let's get
3 you excited about running for an office, and a --
4 for a office position, the House or the Senate,
5 get excited about that. And only to go back
6 behind myself and tell them, well, next time.

7 And then that's a slap in their face
8 because they say, you lied then, you're lying now,
9 things ain't going to change. This is Louisiana.

10 So trying to get the harm -- the harm is
11 to this whole state of Louisiana because our kids,
12 as they grow up -- they grew up under the Jim Crow
13 law. They grew up understanding what Jim Crow law
14 is. And now they're young adults. And they
15 saying, "It ain't gonna change. Let me move out
16 of the state of Louisiana. Let me go to another
17 state."

18 So let's try to keep families together.
19 Because that breaks up families. And so the harm
20 to the Louisiana NAACP, but it harms us all.

21 So now I'm still -- I'm still going from
22 town to town shouting that change is gonna come
23 some day, change is gonna come sooner than you
24 think.

25 Q. Thank you.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

102

1 So you said -- I believe one part of
2 your answer was sending members to go into these
3 areas. What areas are you referring to?

4 A. Well -- well, when we were -- we were
5 sending members into areas where the elections or
6 maps saying we were going to get a -- a
7 majority-minority representative there, right.
8 Sending them there to get people excited about
9 participating again in the process, the democratic
10 process. Getting them geared up to maybe my uncle
11 or maybe my brother's about to become a state
12 senator or state representative, and getting them
13 excited about what's about to happen, what's going
14 to come, what's down the road.

15 Q. Are you aware of any specific resources
16 that have been diverted as a result of the enacted
17 maps?

18 A. Well, we talk about resources. Do you
19 mean resources from the State Conference or
20 resources from any other -- any other areas
21 that...

22 Q. Sure, from the State Conference.

23 A. I'm aware because -- you know, because,
24 you know, I have to make sure that we have the
25 resources. And so we -- we've diverted resources.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

103

1 We've diverted finances. We've diverted manpower.
2 I'm aware of -- I'm aware of it personally because
3 I've had to say that we're not gonna spend in
4 here; if we are, we're not going to spend this
5 much; we're going to have to double up in this
6 particular area. And we need to talk about
7 renting cars and renting vans and those type of
8 things. And we need to talk about hotel rooms.
9 And we talk about staying all day and all night.
10 I'm aware of the resources that go into these
11 particular areas.

12 Q. Are you aware of any specific events
13 that have been canceled or postponed as a result
14 of the enacted maps?

15 A. Oh, yes.

16 MS. ROHANI: Objection.

17 Go ahead.

18 A. Oh, yes, yes, indeed.

19 I refer -- refer to you again, I'm a
20 native Louisianan. I know areas that we can go
21 easily into and do the -- and do the cheering
22 thing and take down. And I'm also aware of areas
23 that we have to tiptoe in now. And so I am -- I'm
24 aware of areas like that. I'm aware of stuff that
25 we had planned for those areas that we tiptoe in.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

104

1 I'm aware of things like that. I'm aware of -- we
2 didn't have -- we had planned to have maybe a -- a
3 town hall or -- or a rally, I'm familiar with
4 that. But we had to postpone that or we had to
5 downsize or we're going to be staying and talking
6 about the people that we were gonna make sure that
7 got there. I'm familiar with those type of
8 things.

9 Q. What -- I believe you mentioned town
10 halls. What specific town halls were canceled?

11 MS. ROHANI: Objection.

12 You can answer.

13 A. Well, we're looking to go into a town
14 called Bogalusa and engage the memberships there,
15 the town there. We've been looking to go to
16 Orleans because they're always excited about
17 getting geared up to get people excited about
18 transform to government. But we had to downsize
19 that, or not change that at all. And other areas
20 that we've had to do specifically, we just
21 couldn't do.

22 Q. Now, the State Conference is still
23 having their annual conference this year?

24 A. I like you, Cassie, because you're
25 excited about it, just like I am.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

105

1 Q. I am.

2 A. We are in a couple of weeks. So, you
3 know, I want you to be my guest. And we are. I'm
4 excited about it.

5 Q. Great.

6 And are you aware of any legislative
7 efforts that have been sidelined as a result of
8 the enacted maps?

9 MS. ROHANI: Objection.

10 But you can answer.

11 A. Probably so, because I talk to -- I talk
12 to the black caucus all the time. I talk to them
13 and their leadership. But specifically, it's
14 something that eludes me right now. But I speak
15 to them regularly. We speak with them regularly
16 about things that they're doing, the things that
17 we can do together. But it specifically eludes me
18 right now.

19 Q. Mr. McClanahan, are you familiar with
20 the Voting Systems Commission?

21 A. Yes, I am.

22 Q. And what is that commission?

23 A. It's a legislative-created commission
24 that talks about the -- the way that voting will
25 take place in the state of Louisiana in the

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

106

1 future.

2 Q. And are you a member of that commission?

3 A. Yes, I am.

4 Q. Is the Voting Systems Commission
5 important to the Louisiana State Conference?

6 MS. ROHANI: Objection.

7 You can answer.

8 A. Very much so.

9 Q. How so?

10 A. Because as we have voted now in
11 Louisiana, we have a machine, electronic machine
12 that records and tabulates the votes. And so now
13 we're not going to have that. It's going to be
14 done either through paper or a hybrid paper
15 system.

16 And for us, change for people, period,
17 it's just not good. And so for all of Louisiana,
18 not just black Louisiana, that would change. And
19 so persons may -- may not vote because the lines
20 may be longer.

21 And that's -- that may be a form of
22 voter suppression because telling me I have to
23 wait outside in long lines to vote or -- it may be
24 scary, changing my voting, so...

25 But it's -- you know, it's important to

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

107

1 the NAACP because we want -- we want to make
2 voting easier, not more cumbersome. We want
3 people to be able to vote happily and freely,
4 right.

5 And so through the commission, it's just
6 not happening because they already passed the law
7 saying how the voting machines gonna be done
8 through -- in the future.

9 Q. Mr. McClanahan, are you familiar with
10 Senate Bill 23?

11 A. If you tell me what it is, I can tell
12 you if I'm familiar with it or not.

13 Q. Sure.

14 I can say generally it expands
15 permissible locations and alternative locations
16 for early voting. Does that sound familiar?

17 A. Yes.

18 Q. Do you know if that bill passed?

19 MS. ROHANI: Objection.

20 This is not really relevant to the case
21 at hand. If Mr. McClanahan is being asked in
22 his personal capacity -- but he's here as a
23 representative of the Louisiana NAACP. So
24 with regards to questions about his position
25 on the Voting Systems Commission, those are

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

108

1 personal to President McClanahan. He's not a
2 member of that commission.

3 BY MS. HOLT:

4 Q. So, Mr. McClanahan, are you a member of
5 the commission in your personal capacity?

6 A. No. I say it as a member of the NAACP.

7 Q. Okay. Thank you.

8 And I was asking you about Senate
9 Bill 23. Is examining early voting locations --
10 or expanding, excuse me, early voting locations an
11 important policy objective of the Louisiana NAACP?

12 MS. ROHANI: Objection.

13 But you can answer.

14 A. Yes, it is.

15 Q. And do you know if Secretary Ardoyn
16 worked to help get that legislation passed?

17 MS. ROHANI: Objection.

18 You can answer.

19 A. I have -- I really don't know personally
20 if he worked on it. But, you know, it's something
21 that he should have been worked on if he didn't.

22 Q. And what is the harm suffered by
23 Louisiana State Conference members as a result of
24 the enacted maps?

25 MS. ROHANI: Objection.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

109

1 You can answer.

2 A. What harm -- say that again. Repeat the
3 question.

4 Q. Sure.

5 So I previously asked you about the harm
6 suffered by the organization. Now I'm wondering
7 about the harm to any of the individual members.

8 A. As a result of the enacted maps?

9 Q. Yes, sir.

10 A. Okay.

11 Now I get calls. I get calls from the
12 members that talk about -- because I tell them to
13 get their areas excited. They're not excited
14 because this is Louisiana. They say, "President
15 McClanahan, we love you, you're always getting us
16 excited about the changes happening in Louisiana,
17 but we don't see change. And without proper
18 representation, the status quo is the same."

19 They understand. Some of these small
20 towns are so racist and so low down, you know, I
21 can't go in there and have a NAACP shirt on. If I
22 do, man -- if I do before -- before the sun goes
23 down, that's fine, but after the sun goes down, I
24 have to make my way -- I probably have to change
25 clothes because, you know -- because things are

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

110

1 real, real rough, the racism and low down.

2 So members understand that. So if they
3 had somebody who understands their plight, you
4 know, they could -- they could finally feel that
5 there is hope, there's a hope for them in
6 Louisiana when most -- most people would have no
7 hope because of things staying the same. So
8 members would be down in the dumps.

9 I get those calls. You know, the family
10 saying, "I told you, President McClanahan, you
11 doing good, but you -- you barreling upstream."
12 And they would talk about now look at what's going
13 to happen to the school system in which their kids
14 and grandkids live.

15 They would talk about the police
16 brutality that happens in these communities as a
17 result of it because they don't have proper
18 representation.

19 They would talk about how -- how they
20 will have access to -- to healthcare, you know,
21 adequate and affordable healthcare because they
22 would have adequate representation; how the
23 streets still have potholes filled up; President
24 McClanahan, we're not going to get trash picked up
25 today, not on our side of the town because we

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

111

1 don't have the representation that we need to look
2 after us and to advocate for us. They would talk
3 about that.

4 Q. Mr. McClanahan, do you know of a
5 specific member who hasn't been able to elect
6 their candidate of choice because of the enacted
7 maps?

8 MS. ROHANI: Objection.

9 But you can answer.

10 A. If I -- if I were to tell -- look at the
11 maps that were illegally drawn, everybody will
12 raise they hand. All of them, like in school.
13 They would all raise their hand like -- if you
14 asked them a question like that.

15 Q. So is it your position that all members
16 of the Louisiana State Conference are harmed as a
17 result of the enacted maps?

18 MS. ROHANI: Objection.

19 But you can answer.

20 A. Well, to this extent, if one suffer, we
21 all suffer. If one suffers, we all suffers.

22 Q. So that includes members that aren't
23 registered voters?

24 MS. ROHANI: Objection.

25 But you can answer.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

112

1 A. In a -- you know, if one suffer, we all
2 suffer. Suffering doesn't -- I don't think
3 suffering has anything to do with whether or not
4 you're a voter or not, right. If you suffer
5 internally, emotionally, spiritually, financially,
6 economically, you know, you suffer. Suffer is
7 suffering. I don't think because I'm a voter and
8 you may not, that your suffering is -- is any less
9 or a bit worse than mine. I think suffering is
10 suffering.

11 Q. Sure.

12 Mr. McClanahan, are you familiar -- I
13 believe we looked at before -- with the claims
14 brought in this case?

15 A. If you talk about something specific,
16 show me.

17 Q. Sure.

18 Do you understand this case to be under
19 the Section 2 of the Voting Rights Act?

20 A. Yes.

21 MS. ROHANI: Apologies.

22 Would it be possible to have that on the
23 screen so President McClanahan is able to
24 look at it while we go over this?

25 MS. HOLT: Sure.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

113

1 The Amended Complaint?

2 MS. ROHANI: Correct. Exhibit 3.

3 Thank you.

4 BY MS. HOLT:

5 Q. And, Mr. McClanahan, we're on Exhibit 3,
6 page 58, the Prayer for Relief that we discussed
7 earlier. Do you see paragraph A?

8 A. Yes.

9 Q. And do you see where it says "...in
10 violation of Section 2 of the Voting Rights
11 Act..."?

12 A. Right.

13 Q. So I'm wondering about the specific harm
14 to members --

15 A. Okay.

16 Q. -- under this specific claim, not the
17 general harm. So I'm wondering what members --
18 are you aware of a specific member who has not
19 been able to elect its -- his candidate of choice
20 because of the enacted maps?

21 MS. ROHANI: Objection. This calls for
22 a legal conclusion.

23 But, President McClanahan, to the best
24 of your knowledge, you can answer.

25 A. To the best of my knowledge, I am aware

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

114

1 of a member.

2 Q. And who is that member?

3 MS. ROHANI: Objection.

4 Personally-identifiable information is not
5 appropriate to be asked at this point.

6 BY MS. HOLT:

7 Q. Mr. McClanahan, what senate district do
8 you live in?

9 A. I should know, but it eludes me. I
10 can't tell off the top of my head today. Ask me a
11 little bit later on, I probably could tell you.

12 Q. Okay. If I said Senate District 15,
13 does that sound right?

14 A. If you can -- if you can -- who the
15 senator is? I could tell if it's mine or not.

16 Q. Well, who -- who is your senate
17 representative?

18 Is it Senator Regina Barrow?

19 A. Yes.

20 Q. And is Ms. Barrow a democrat?

21 A. I don't know her party affiliation.

22 Yes, she is. Yes, she is.

23 Q. Is she black?

24 A. Yes.

25 Q. Was Senator Barrow your candidate of

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

115

1 choice in the last state senate election?

2 MS. ROHANI: Objection, again calls for
3 a legal conclusion.

4 But you can answer.

5 A. I don't know who was running against
6 her. But she's a personal friend.

7 Q. But was she your candidate of choice out
8 of all the candidates running?

9 MS. ROHANI: Again, objection, vague.

10 A. Ask it another way. Let me see if I can
11 answer that.

12 Q. Sure.

13 So did you vote for Senator Barrow?

14 MS. ROHANI: Objection.

15 Direct not to answer.

16 MS. HOLT: On what grounds, Sara?

17 MS. ROHANI: Again, that's personal --
18 that's private information. It's not
19 appropriate to be asking about who President
20 McClanahan voted for.

21 BY MS. HOLT:

22 Q. Okay. Mr. McClanahan, you said
23 earlier -- you had talked about expanding the
24 options for, like, people to elect their -- a
25 candidate of their choosing. Was Senator Barrow

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

116

1 the candidate of your choosing?

2 A. When I talked about expanding options, I
3 was talking about everyone. And it just so
4 happens she just might have gotten into the race.
5 But, for me, it was broad. It was broader than
6 that. For everybody to have a candidate of their
7 choice. And I don't -- I don't think she was
8 running at the time. I don't think she was
9 running at the time, I don't think.

10 Q. Okay. So you -- hmm. Let me -- let me
11 ask you some -- something a little bit different.

12 So for other state legislative districts
13 that already elect black representatives, what is
14 the harm to members in those specific districts?

15 MS. ROHANI: Objection.

16 You can answer.

17 A. You're saying what harm is there to
18 members that have black represen- -- black
19 representation?

20 Q. Yes, sir.

21 A. They -- there might be harm in that once
22 bills come -- bills come through or legislation
23 comes through its process, if there are not enough
24 persons to pick up their representative vote as
25 they wish to get that legislation passed, then

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

117

1 they're harmed because there are not enough of
2 persons that look like them, black and brown
3 people, that would get that particular legislation
4 through. And so they're harmed if they only have
5 one black and you got -- just say senate, you've
6 got 39 senators, you have five blacks, but you
7 want to get something passed that affects you as a
8 black person in one of those senatorial areas.

9 Q. Can -- do -- I'm going to -- I'm going
10 to strike that.

11 I'm going to ask you about a specific
12 example.

13 So House District 63, do you know who
14 the representative is for that district?

15 A. You tell me where District 63 is --

16 Q. Sure.

17 A. -- I'll help you out.

18 Q. It is in Baton Rouge.

19 And does the name Barbara Carpenter
20 sound familiar?

21 A. Barbara Carpenter sounds familiar.

22 Q. Okay. Do you know if Ms. Carpenter is
23 black?

24 A. Yes, she is.

25 Q. Okay. How is a member that lives in

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

118

1 Representative Carpenter's district harmed by the
2 enacted maps?

3 A. Because, as I alluded before, Barbara
4 Carpenter might go there and talk -- she might
5 talk to her constituents about things that matter
6 to them. If she goes to the Legislature and
7 proposes legislation, it will not pass because
8 there's not enough Barbara Carpenters, a person
9 that looks like Barbara Carpenters, that would get
10 it through. And so if we had more -- more persons
11 that looked like Barbara Carpenter there, then
12 maybe the Legislature could get passed.

13 But because the map does not give enough
14 of minorities the opportunity to get elected to
15 these positions -- so the legislation that would
16 have helped Barbara's constituents doesn't get
17 past committee -- so they're harmed.

18 MS. HOLT: Sara, I've got a few more
19 questions, but now might be a good time for a
20 comfort break. I don't anticipate taking too
21 much longer. Does that sound good to you?

22 MS. ROHANI: Yeah, that sounds good.

23 MS. HOLT: Okay. Do we want to do --
24 let's see. Come back at 1- -- I'm having a
25 hard time seeing the time on all the TV

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

119

1 screens -- 1:05?

2 MS. ROHANI: Yeah. That sounds great.

3 MS. HOLT: Okay. Great. Thank you.

4 (Recess in proceedings.)

5 MS. HOLT: All right. Back on the
6 record.

7 BY MS. HOLT:

8 Q. Mr. McClanahan, you mentioned earlier
9 that you do political work; is that correct?

10 A. Correct.

11 Q. Did you do political work for Senator
12 Barrow?

13 A. No.

14 Q. Did you do political work for
15 Representative Carpenter?

16 A. No.

17 Q. Has Senator Barrow represented your
18 interests in the senate?

19 MS. ROHANI: Objection.

20 This is outside the scope. President
21 McClanahan, again, is here as a
22 representative of the State Conference and
23 not in his individual capacity.

24 But you can answer, President.

25 A. Has she represented -- she's represented

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

120

1 my interests to the best of her ability.

2 Q. Now, I believe before the break some of
3 the harm that was discussed involved school
4 boards. And does the Legislature appoint school
5 board members?

6 A. They -- they don't.

7 Q. School board members have different
8 maps; right?

9 A. Right.

10 Q. And they have their own elections?

11 A. Right.

12 Q. Does the Legislature award trash
13 contracts?

14 MS. ROHANI: Objection. This is outside
15 the scope of this litigation.

16 MS. HOLT: Sara, he's testified that
17 part of the harm was trash and trash pickups,
18 so I am just asking him about that.

19 MS. ROHANI: Okay.

20 Please go ahead and answer, President.

21 A. No.

22 Q. Okay. Do you know who awards trash
23 contracts?

24 MS. ROHANI: Objection.

25 You can answer.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

121

1 A. I'm quite sure that the local government
2 authority.

3 Q. Okay.

4 MS. HOLT: No further questions for me
5 at this time.

6 Do any of the other defendants have
7 questions?

8 MS. PROUTY: Yes, I do. This is Erica
9 Prouty on behalf of the Legislative
10 Intervenors.

11 EXAMINATION

12 BY MS. PROUTY:

13 Q. Mr. McClanahan, I apologize that we
14 haven't met, but I would like to ask a few
15 follow-up questions today.

16 A. Okay.

17 Q. So I understand your testimony earlier
18 today was that you did not review any documents or
19 lists when preparing the responses -- or the
20 supplemental responses to Interrogatory No. 3.

21 MS. PROUTY: I believe that's Exhibit 4,
22 if we want to pull that back up.

23 MS. ROHANI: Objection. That misstates
24 President McClanahan's testimony.

25 A. Correct.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

122

1 Q. So I know we're at the end here and the
2 lunch hour's approaching, so I want to keep it
3 short and just focus on what you did to prepare
4 the supplemental responses to this interrogatory.

5 So I understand, Mr. McClanahan, that
6 you said you met with counsel to prepare your
7 responses to Interrogatory No. 3; is that right?

8 A. Well, that -- that was one of the -- one
9 of the things that I did. That's one. I did some
10 other stuff, but one of the things I did was meet
11 with counsel, right.

12 Q. Okay. And who did you meet with?

13 MS. ROHANI: Objection, attorney-client
14 privilege.

15 Direct not to answer.

16 MS. PROUTY: Sara, I believe he can
17 identify who he met with.

18 MS. ROHANI: Oh, apologies. Apologies.
19 I misheard the question.

20 MS. PROUTY: Yeah.

21 MS. ROHANI: Okay. Thank you, Erica.

22 A. Okay. So I talked to LDF, the team of
23 lawyers with LDF.

24 Q. Okay. And do you recall the specific
25 names of the attorneys at LDF you met with?

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

123

1 A. I do. I do. I think at some point in
2 time I met with -- I know Sara, Stuart, Victoria,
3 maybe others, but they elude me right now. But I
4 know those came from heaven.

5 Q. And when did you have those meetings to
6 repair -- to prepare the supplemental responses to
7 Interrogatory No. 3?

8 A. If you're looking for a date and time,
9 I'm not that smart. I write everything down.
10 Even my kids' names. So I don't know a date and
11 time that we did, but it was before I signed it
12 and sent it in, if that would help.

13 Q. Okay. Do you know for about how long
14 you met?

15 A. We met over time, just not one day, one
16 call. It was a series of calls and a series of
17 meetings.

18 Q. Okay. And did you review any documents
19 when you were preparing the supplemental response
20 to Interrogatory No. 3?

21 A. Well, I looked at the illegal maps, I
22 looked at the illustrative maps and then I looked
23 at the state of the federal -- the -- the map that
24 has the parishes on it and the list -- and just
25 the out- -- the outlines of the parishes. I

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

124

1 looked at the names of the parishes and the map
2 that has that.

3 Q. Okay. But no other documents; is that
4 right?

5 A. Not to -- not to my knowledge.

6 Q. Okay. And when you were preparing your
7 supplemental response to Interrogatory No. 3, did
8 you identify the specific name of the member who
9 lives in House District 4, for example?

10 MS. ROHANI: Objection, privileged
11 communications.

12 Q. To the extent that you can answer
13 without revealing any privileged communi- --
14 communications, did you -- you identify the
15 specific name of the member who you assert lives
16 in House District 4?

17 A. Identify, yes.

18 Q. You did identify that member?

19 A. Identified.

20 Q. Okay. And you -- you identified their
21 specific name?

22 A. Identified the member and the name --
23 identified the name. Might have got a first name,
24 might have got a second name, might have got them
25 both right, but I identified a person.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

125

1 Q. Okay. So do you -- at the time you were
2 preparing this response, you were able to identify
3 a specific name of that member who lives in House
4 District 4?

5 A. Yes.

6 Q. Okay. And I understand this is likely
7 to draw an objection, but would you be able to
8 state that name on the record today?

9 MS. ROHANI: Objection.

10 Q. I'm not asking you to actually identify
11 what that name is, but if you could, would you be
12 able to remember who that is today?

13 MS. ROHANI: Objection.

14 MS. PROUTY: Are you instructing him not
15 to answer?

16 MS. ROHANI: Yes.

17 MS. PROUTY: Okay.

18 BY MS. PROUTY:

19 Q. And when you were preparing your
20 response to Interrogatory No. 3, did you identify
21 the address of the specific member who lives in
22 House District 4?

23 A. In House District 4, I would say yes. I
24 have been to those houses. I would say, yes. I
25 identified the address. Now -- yes. I'm just --

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

126

1 yes.

2 Q. And how did you do that?

3 A. How did I identify the address?

4 Q. Yeah.

5 A. I know the -- I know -- when I -- when I
6 cross-referenced the illustrative maps and the
7 illegal maps and the parishes that they in, I
8 probably -- I've been to most, if not all of
9 the -- the areas that -- that are there, and I
10 could identify that persons. Might not can do a
11 navigation to his house, but I know the area.

12 Q. Okay. And do you know where House
13 District 4 is -- is located?

14 A. If you tell me -- if you tell me the
15 parish, I can tell you where it's at.

16 Q. It's not -- it's not a memory test.
17 Just curious.

18 And when you said that you were
19 preparing Interrogatory No. 3 and you were
20 identifi- -- you were able to identify the
21 specific name of the member who lives in House
22 District 4, how did you do that?

23 A. Repeat that now.

24 Q. When you were preparing your responses
25 to Interrogatory No. 3, and you said you were able

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

127

1 to identify the specific name of the member who
2 lives in House District 4, how did you do that?

3 A. As I alluded earlier, what I do is
4 cross-reference the area so I can identify the
5 parish, the town, and where the branch is located
6 at. Based upon that knowledge there alone, once I
7 know the branch, I know the leadership.

8 Q. Okay. And so you were able to just
9 recall a specific name?

10 A. Yes.

11 Q. Okay. Is there a record of that name
12 somewhere?

13 A. Now, the -- the branch is -- the
14 branches has membership roles. They do that.
15 Now, I know because I have to go -- I have to
16 go -- probably have to administer the oath,
17 probably have installation. So I go to these -- I
18 go to these branch areas all the time. And so I
19 can identify that, I know they're there, but I
20 don't know all the different areas.

21 Q. Okay. But you didn't review the
22 membership role when you were preparing your
23 supplemental response to Interrogatory No. 3;
24 right?

25 MS. ROHANI: Objection.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

128

1 But you can answer.

2 A. No, I didn't get a -- I didn't get a --
3 I didn't get a roster, per se, or role, per se.

4 Q. And when you identify the address of
5 this -- the same specific member in House
6 District 4, how did you know what their specific
7 address was?

8 A. Okay. So I've -- I've been to these
9 areas. I've almost lived in all of these areas
10 because I'm rarely at home. So -- this is
11 Louisiana -- when I go to these places, they bring
12 me to their house. If I could -- I could
13 identify. I can identify the particular area, the
14 particular member or members. But we know at
15 least one. I can identify at least one member
16 there. And might not could take you to the house,
17 but I could identify with certainty those that
18 live in that -- in that area.

19 Q. And when you were preparing your
20 response to Interrogatory No. 3, did you do
21 anything to confirm that that specific member in
22 House District 4 -- that their address actually
23 fell within the boundaries of House District 4 and
24 wasn't, for example, in House District 5 or House
25 District 2?

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

129

1 A. Right, right. Yeah. I did. We did. I
2 did.

3 Q. Okay.

4 A. With the lawyers, we did. We did.
5 We -- we cross-referenced to make sure that -- and
6 some of these areas, right, some of these areas
7 were close, where the lines might have drawn, but
8 we identified to the -- to the street that they
9 were not in -- they were in this particular
10 district and not in the one that it was not.

11 Because sometimes when you look, zoom in -- you
12 have to zoom in. And we zoomed in and realized
13 the street and we identified the member that lives
14 in that particular district on that street.

15 Q. And when you were preparing your
16 responses to Interrogatory No. 3, did you
17 personally talk to this specific member who lives
18 in House District 4?

19 MS. ROHANI: Objection, to the extent
20 that it calls for attorney-client privileged
21 communications.

22 Direct not to answer.

23 MS. PROUTY: And I -- I believe the
24 question didn't call for information
25 protected by the attorney-client privilege.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

130

1 BY MS. PROUTY:

2 Q. But did -- did you personally talk to
3 this specific member?

4 A. I talked to -- I talked to -- as I
5 alluded to under Cassie's questioning, I talked to
6 all of them. Maybe not individually. Some
7 individually, some not. But all of them,
8 collectively, I spoke with.

9 Q. Okay. So you can't recall a specific
10 conversation with a specific member in House
11 District 4?

12 A. When you say "conversation," you know,
13 we have general conversation or we have specific
14 conversations.

15 Q. Yes.

16 A. I can say -- I can speak to general
17 conversations, yeah. But if you ask me something
18 else...

19 Q. Yeah.

20 I'm talking about when you were
21 preparing your supplemental response to
22 Interrogatory No. 3, did you speak to the member
23 who lives in House District 4?

24 A. Once I identified who that member was, I
25 didn't -- I didn't go and say, look, we preparing

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

131

1 a lawsuit because this is your area.

2 But I do know when I spoke with them
3 through the quarterly meetings, the State
4 Conference conventions, we identified these areas
5 of interest. And so we just did a general talk
6 about all of them because you have a -- a host of
7 house districts that we're looking at.

8 So I would tell them that we're coming
9 to them because we have a -- we have some
10 discrepancies based upon the illegal maps and the
11 maps that our people have drawn. And so --

12 Q. I apologize. I don't mean to interrupt,
13 but I -- I think we can keep this really specific.

14 So you did not have a conversation with
15 a specific member in House District 4 when you
16 were preparing your supplemental response to
17 Interrogatory No. 3?

18 A. Did you say did I have or did I not?

19 Q. Did you -- you did not have a
20 conversation with them?

21 A. Not specifically.

22 Q. Okay. Do you know if this specific
23 member who lives in House District 4 is registered
24 to vote?

25 A. No, I don't.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

132

1 Q. Okay. Do you know if this specific
2 member who lives in House District 4 intends to
3 vote in future elections?

4 A. I -- I don't.

5 Q. Okay. And do you know for whom this
6 specific member who lives in House District 4
7 voted for in the last election for the Louisiana
8 House of Representatives?

9 A. No, I don't.

10 Q. Okay. Now, are the answers the same for
11 all of the other house districts that are
12 identified in this supplemental response to
13 Interrogatory No. 3?

14 A. Yes, it would be the same.

15 Q. Okay. And the same for all the senate
16 districts that are identified in the supplemental
17 response to Interrogatory No. 3?

18 A. Right.

19 Q. Are you still there, Mr. McClanahan?

20 A. Yes.

21 Q. Okay. I apologize, I didn't hear your
22 answer.

23 Is your answer the same for all of the
24 districts, the senate districts that are
25 identified in supplemental interrogatory response

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

133

1 No. 3?

2 A. If you're -- if you're asking if my
3 answer would be the same as you questioned me
4 about No. 4?

5 Q. Yes.

6 A. Well, I can't say that because I have
7 spoken to some of them. Some of them are more
8 personal to me than others.

9 Q. Okay.

10 A. So I can't say all.

11 Like the Orleans president is a friend
12 of mine, so I speak with him. The Baton Rouge guy
13 is a friend of mine. So some of them are a little
14 bit closer than others so I would speak to them
15 more intimately as opposed to others.

16 Q. Okay. But the questions about whether
17 you know for a fact that they are registered to
18 vote or they intend to vote for -- in future
19 elections or who they voted for in the past, is
20 your answer no, you still don't know as to the
21 specific districts in the senate for those
22 members?

23 A. I don't know what they would do
24 personally. I would hope that they would vote,
25 but I don't know personal -- their personal

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

134

1 voting.

2 Q. Okay. Great.

3 MS. PROUTY: Well, thank you,
4 Mr. McClanahan. Those are all the questions
5 that I have for you today. I really
6 appreciate your time.

7 THE WITNESS: Thank you.

8 MS. HOLT: All right. And, Sara, at
9 this time we're going to leave the deposition
10 open pending motions practice regarding the
11 instructions not to answer.

12 MS. ROHANI: Understood.

13 I have a few questions for President
14 McClanahan.

15 MS. HOLT: Oh. Absolutely.

16 EXAMINATION

17 BY MS. ROHANI:

18 Q. So, President McClanahan, you were
19 earlier asked about the membership -- membership
20 structure of the State Conference. Do you
21 remember that?

22 A. Yes.

23 Q. And you explained your understanding of
24 the membership structure.

25 A. Okay. Yes.

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

135

1 Q. And where does this understanding --
2 your understanding of the membership structure
3 come from?

4 A. It comes from the constitution and
5 by-laws and -- and my being in the NAACP for over
6 ten years.

7 Q. So is it fair to say that the membership
8 structure is accurately reflected in the NAACP
9 by-laws?

10 A. Correct.

11 MS. ROHANI: Thank you. No further
12 questions.

13 MS. HOLT: All right. So I'll just
14 restate again that we're -- at this time,
15 we're leaving the deposition open pending
16 further motions practice on the instructions
17 not to answer, but we would still like a copy
18 of the transcript.

19 Does the stenographer need any
20 information?

21 THE COURT REPORTER: I would just ask if
22 you want the exhibits attached as well?

23 MS. HOLT: Yes, please.

24 THE COURT REPORTER: Okay. Thank you.
25 And then other counsel present, if you

Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

136

1 could let me know your orders at this time.

2 MS. ROHANI: We will read and sign, and
3 also would like a copy of the transcript,
4 please, with the exhibits.

5 THE COURT REPORTER: Thank you.

6 MS. PROUTY: And this is Erica Prouty on
7 behalf of the Legislative Intervenors. We
8 would like a copy as well.

9 THE COURT REPORTER: And exhibits?

10 MS. PROUTY: Yes, please.

11 THE COURT REPORTER: Thank you. I think
12 that takes care of it.

13

14 AND FURTHER THIS DEPONENT SAITH NOT.

15 SIGNATURE RIGHTS RESERVED.

16 (Videotaped Deposition concluded at 1:25 p.m.)

17

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Transcript of Michael McClanahan, Designated Representative
Conducted on September 8, 2023

137

1 STATE OF NORTH CAROLINA:

2 COUNTY OF MECKLENBURG :

3 I, April Reid, Court Reporter and Notary
4 Public in and for the State of North Carolina,
5 and whose commission expires March 4, 2025,
6 do certify that the aforementioned appeared
7 before me, was sworn by me, and was thereupon
8 examined by counsel; and that the foregoing is a
9 true, correct, and full transcript of the
10 testimony adduced.

11 I further certify that I am neither
12 related to nor associated with any counsel or
13 party to this proceeding, nor otherwise interested
14 in the event thereof.

15 Given under my hand and notarial seal in
16 Charlotte, North Carolina, this 12th day of
17 September, 2023.

18 
19

20 April Reid, RPR, CRR, Notary Public
21 State of North Carolina, County of Mecklenburg
22 Notary Registration No. 20012210079
23
24
25

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

138

A			
ability	125:10, 128:22	affirmed	al
120:1	adcock	7:7	1:5
able	4:16, 29:24	affordable	alluded
107:3, 111:5,	add	110:21	68:4, 71:11,
112:23, 113:19,	58:16	aforementioned	82:25, 86:7,
125:2, 125:7,	added	137:6	118:3, 127:3,
125:12, 126:20,	35:1, 35:13,	afr	130:5
126:25, 127:8	36:7, 38:3	20:14	almost
above	addition	african	128:9
36:13, 36:18	79:25, 96:15,	47:8, 58:25	alone
absolutely	96:19	after	67:19, 127:6
134:15	additional	32:6, 32:7,	along
abundant	46:2, 46:3,	109:23, 111:2	52:5, 52:7,
55:22, 55:23	98:11	again	100:21
access	address	43:9, 46:5,	alora
110:20	8:13, 8:14,	48:24, 55:13,	4:13, 22:14
accordance	8:16, 8:17,	62:22, 71:7,	already
97:11	8:19, 8:23,	76:16, 84:6,	11:10, 67:7,
according	67:3, 67:10,	89:17, 102:9,	79:19, 98:24,
47:11	125:21, 125:25,	103:19, 109:2,	107:6, 116:13
account	126:3, 128:4,	115:2, 115:9,	also
98:19	128:7, 128:22	115:17, 119:21,	3:3, 4:3, 23:6,
accurately	addresses	135:14	38:13, 52:11,
135:8	26:23, 27:1,	against	52:14, 53:14,
achieve	66:6, 74:7,	115:5	53:15, 66:19,
43:17, 43:24	81:25	age	78:4, 85:6,
aclu	addressing	28:19	87:24, 88:11,
4:14	97:4	agree	97:7, 103:22,
act	adduced	18:25, 44:11,	136:3
48:19, 112:19,	137:10	46:2, 46:3,	alternative
113:11	adequate	63:11, 70:21,	107:15
action	110:21, 110:22	92:19	alton
1:4, 40:22,	administer	agreed	9:20
40:23, 98:1	127:16	44:3, 45:10,	always
actions	administrator	51:24, 52:2,	11:4, 45:3,
41:8	88:6, 88:11	53:20, 76:4,	45:10, 53:9,
activities	adult	86:12, 92:19	53:25, 104:16,
22:12, 96:25	14:25, 19:18,	agrees	109:15
activity	29:5	87:1	alyssa
64:17	adults	ahead	2:17
acts	101:14	17:2, 46:1,	amanda
23:3	advocate	49:11, 52:20,	4:5, 4:9, 8:1
actually	111:2	72:7, 72:9,	amended
10:2, 56:18,	affect	73:4, 103:17,	5:13, 5:18,
69:13, 71:3,	70:15	120:20	15:12, 16:3,
95:25, 96:2,	affects	ain't	39:2, 39:16,
	117:7	101:9, 101:15	39:20, 48:20,
	affiliation	airline	50:12, 60:4,
	114:21	8:19, 21:1	

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

139

113:1 amendment 27:23, 28:4, 28:5, 80:15 americans 47:8, 58:25 among 62:13, 81:7, 90:13 annual 20:5, 20:17, 104:23 another 101:16, 115:10 answer 10:21, 27:10, 41:21, 42:12, 43:12, 44:6, 44:17, 46:19, 47:4, 49:1, 51:11, 55:15, 56:11, 56:24, 57:21, 58:23, 59:7, 61:7, 62:21, 63:2, 63:19, 66:10, 68:3, 72:9, 74:20, 75:4, 75:23, 76:20, 78:11, 78:13, 78:19, 79:8, 79:12, 82:5, 82:6, 82:7, 82:17, 82:22, 83:1, 84:10, 86:4, 86:21, 87:22, 89:18, 92:10, 92:25, 93:19, 94:1, 94:13, 97:23, 102:2, 104:12, 105:10, 106:7, 108:13, 108:18, 109:1, 111:9, 111:19, 111:25, 113:24, 115:4, 115:11, 115:15, 116:16, 119:24,	120:20, 120:25, 122:15, 124:12, 125:15, 128:1, 129:22, 132:22, 132:23, 133:3, 133:20, 134:11, 135:17 answered 75:17 answering 11:25, 75:20 answers 13:19, 16:10, 42:10, 69:6, 71:8, 80:16, 132:10 anticipate 118:20 any 8:7, 10:3, 10:6, 11:25, 12:18, 12:22, 12:25, 13:24, 14:17, 17:12, 18:3, 21:11, 21:16, 23:18, 25:15, 27:22, 30:10, 30:18, 34:22, 38:18, 41:6, 42:4, 42:15, 43:2, 43:6, 44:1, 46:7, 50:23, 51:7, 54:23, 58:10, 58:12, 64:12, 74:6, 74:17, 74:21, 74:23, 74:25, 81:24, 85:25, 89:5, 91:6, 92:6, 93:11, 93:14, 94:9, 102:15, 102:20, 103:12, 105:6, 109:7, 112:8, 121:6, 121:18, 123:18, 124:13, 135:19, 137:12	anybody 27:13 anymore 12:10 anyone 15:3, 15:5, 21:21 anything 11:13, 11:24, 12:17, 23:7, 23:8, 27:13, 27:15, 36:18, 36:24, 37:6, 37:7, 47:10, 47:14, 51:22, 68:22, 69:23, 72:1, 76:19, 91:8, 93:6, 112:3, 128:21 apologies 58:22, 70:11, 82:19, 82:23, 86:18, 112:21, 122:18 apologize 49:7, 86:17, 90:3, 121:13, 131:12, 132:21 appeared 2:2, 137:6 application 35:9 applies 47:20 apply 47:19 appoint 120:4 appreciate 7:23, 18:8, 43:25, 134:6 approaching 122:2 appropriate 80:6, 114:5, 115:19 april 1:25, 137:3,	137:20 ardoin 1:8, 7:18, 7:20, 108:15 ardoin's 5:25, 60:20 area 33:7, 56:14, 65:11, 67:8, 67:12, 69:18, 71:24, 84:17, 85:14, 98:19, 103:6, 126:11, 127:4, 128:13, 128:18, 131:1 areas 65:2, 65:4, 65:6, 65:9, 65:12, 65:17, 65:21, 71:23, 72:11, 75:14, 83:13, 83:15, 90:25, 91:2, 91:16, 93:6, 98:9, 98:13, 98:14, 99:2, 99:8, 100:3, 100:9, 102:3, 102:5, 102:20, 103:11, 103:20, 103:22, 103:24, 103:25, 104:19, 109:13, 117:8, 126:9, 127:18, 127:20, 128:9, 129:6, 131:4 aren't 111:22 arises 21:8 around 42:23, 70:1 asian 58:4, 58:10, 98:21 asked 16:5, 22:7, 45:16, 51:15,
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

140

75:19, 78:11, 79:20, 107:21, 109:5, 111:14, 114:5, 134:19 asking 27:25, 30:20, 30:22, 37:22, 46:8, 46:21, 50:18, 55:2, 55:5, 67:2, 80:6, 88:19, 108:8, 115:19, 120:18, 125:10, 133:2 aspect 36:16 assert 124:15 assessment 20:6, 20:7, 20:15 assigns 20:11 associated 137:12 association 18:22, 50:2, 50:3, 50:6, 50:7 associational 28:4 assume 78:5 attached 15:16, 25:7, 39:6, 60:3, 94:25, 135:22 attend 21:20, 22:2, 34:20, 41:12, 41:13 attendance 41:16, 53:21, 53:25, 54:8, 54:11, 54:13, 54:14 attended 65:16, 66:19, 72:18	attorney 4:6 attorney-client 42:8, 43:10, 66:8, 73:12, 76:18, 82:21, 122:13, 129:20, 129:25 attorneys 122:25 audibly 31:16 authority 46:7, 121:2 automatically 29:22 available 7:24, 24:25 avoid 10:18 award 120:12 awards 120:22 aware 23:23, 54:16, 68:22, 77:4, 77:8, 77:10, 94:9, 94:15, 102:15, 102:23, 103:2, 103:10, 103:12, 103:22, 103:24, 104:1, 105:6, 113:18, 113:25 awareness 43:20 away 33:25, 34:10, 34:11	back 22:17, 26:2, 30:7, 45:25, 49:15, 50:14, 57:14, 57:15, 60:15, 61:10, 73:3, 73:17, 73:21, 95:7, 96:1, 96:12, 98:7, 101:5, 118:24, 119:5, 121:22 bad 83:2 baker 3:13 bandage 99:6 banquet 21:15 banquets 65:1, 76:24, 83:8 barbara 117:19, 117:21, 118:3, 118:8, 118:9, 118:11 barbara's 118:16 barbecue 67:16 barreling 110:11 barrow 114:18, 114:20, 114:25, 115:13, 115:25, 119:12, 119:17 based 50:6, 68:7, 72:14, 74:13, 78:17, 78:22, 78:23, 80:15, 83:16, 91:13, 91:14, 92:2, 92:3, 92:4, 92:16, 127:6, 131:10	basing 52:23 baton 3:8, 8:18, 8:19, 9:9, 9:14, 9:15, 9:18, 12:20, 12:22, 12:25, 14:4, 33:10, 42:21, 83:23, 84:5, 84:12, 84:14, 84:17, 84:20, 85:13, 85:20, 85:22, 93:8, 93:9, 117:18, 133:12 bay 100:12 became 16:23, 40:10, 41:4 because 19:10, 21:5, 24:12, 27:11, 30:12, 31:5, 31:24, 35:19, 36:12, 36:19, 37:14, 38:4, 38:5, 40:11, 40:22, 42:20, 42:23, 43:15, 44:22, 45:4, 51:21, 54:20, 56:14, 58:8, 65:12, 67:7, 69:20, 69:22, 70:24, 72:13, 73:5, 75:7, 77:25, 78:6, 83:5, 86:8, 87:9, 88:21, 89:10, 91:22, 93:21, 93:23, 94:14, 98:6, 98:10, 98:14, 99:5, 99:6, 99:10, 99:18, 100:17, 100:21,
	B		
	b) (6 1:15, 5:13, 15:13, 16:10, 80:3, 80:12 baby 28:21		

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

141

101:8, 101:11, 101:19, 102:23, 103:2, 104:16, 104:24, 105:11, 106:10, 106:19, 106:22, 107:1, 107:6, 109:12, 109:14, 109:25, 110:7, 110:17, 110:21, 110:25, 111:6, 112:7, 113:20, 117:1, 118:3, 118:7, 118:13, 127:15, 128:10, 129:11, 131:1, 131:6, 131:9, 133:6 become 28:16, 28:20, 29:11, 29:13, 29:15, 35:5, 35:6, 35:8, 35:9, 40:9, 68:25, 102:11 becomes 29:5, 29:20 been 9:2, 10:1, 12:7, 13:12, 16:5, 49:12, 57:3, 64:6, 64:23, 67:12, 67:13, 67:17, 71:16, 71:24, 72:15, 72:19, 74:14, 75:1, 75:7, 76:6, 76:21, 78:7, 79:1, 79:5, 79:10, 80:10, 83:13, 84:23, 85:2, 85:3, 85:4, 85:9, 85:10, 85:11, 91:16, 91:17, 91:18, 91:19, 94:10, 96:21, 102:16, 103:13,	104:15, 105:7, 108:21, 111:5, 113:19, 125:24, 126:8, 128:8 before 9:3, 9:11, 10:21, 10:23, 11:22, 14:18, 42:5, 42:16, 44:4, 44:15, 50:23, 51:5, 51:22, 55:7, 58:19, 70:8, 71:11, 73:20, 73:24, 109:22, 112:13, 118:3, 120:2, 123:11, 137:7 begin 7:12 behalf 2:6, 2:15, 3:3, 3:11, 16:6, 121:9, 136:7 behind 101:6 being 7:7, 14:18, 30:25, 35:12, 43:7, 75:15, 90:23, 107:21, 135:5 belief 61:8 believe 18:9, 23:20, 23:24, 24:22, 31:20, 45:22, 46:14, 54:7, 57:5, 58:18, 59:24, 64:11, 70:24, 75:17, 82:5, 96:3, 102:1, 104:9, 112:13, 120:2, 121:21, 122:16, 129:23 belong 12:18, 33:20	below 20:11, 20:12 besides 17:10, 75:5 best 11:6, 61:7, 64:5, 113:23, 113:25, 120:1 better 23:3, 28:15, 37:15, 56:15, 98:2 between 19:6, 38:14, 63:12, 88:8 bill 18:1, 90:12, 107:10, 107:18, 108:9 bills 116:22 binding 16:10 bit 26:6, 40:2, 40:13, 73:5, 95:15, 96:4, 99:9, 99:12, 100:13, 112:9, 114:11, 116:11, 133:14 black 47:8, 56:4, 58:3, 58:25, 59:5, 59:13, 59:16, 77:6, 77:11, 77:15, 77:18, 77:20, 78:6, 89:9, 93:15, 93:22, 97:1, 97:4, 97:8, 98:8, 98:20, 105:12, 106:18, 114:23, 116:13, 116:18, 117:2, 117:5, 117:8, 117:23 blacks 117:6	board 22:19, 23:4, 23:5, 120:5, 120:7 boards 120:4 bodies 38:14 bogalusa 104:14 boldest 69:1 both 8:15, 17:5, 124:25 bottom 25:18, 61:11, 96:14 bought 91:20 boundaries 40:17, 128:23 boy 99:21, 99:22 brain 23:2 branch 12:21, 12:23, 13:1, 29:15, 29:17, 29:21, 30:1, 30:3, 30:6, 31:1, 31:2, 31:4, 32:5, 32:20, 33:6, 33:8, 33:11, 33:13, 33:14, 33:15, 33:18, 33:20, 34:3, 36:11, 36:12, 36:25, 38:12, 42:1, 42:20, 42:22, 43:6, 50:23, 51:7, 51:19, 54:24, 55:1, 68:11, 69:19, 69:24, 70:7, 74:7, 74:17,
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

142

74:23, 74:25, 75:5, 75:6, 75:20, 85:4, 85:5, 85:10, 85:25, 86:14, 87:7, 87:16, 87:25, 88:7, 88:8, 88:17, 92:6, 127:5, 127:7, 127:13, 127:18 branches 12:19, 14:25, 15:10, 18:23, 19:5, 19:6, 19:12, 19:14, 19:18, 19:25, 20:8, 30:10, 30:18, 31:10, 32:6, 32:7, 32:23, 32:24, 32:25, 33:21, 35:20, 35:22, 37:18, 37:21, 37:22, 37:23, 38:5, 38:10, 38:20, 42:5, 42:16, 42:18, 42:23, 43:4, 43:5, 44:3, 49:21, 50:9, 51:1, 53:6, 54:4, 64:13, 64:25, 68:11, 68:12, 68:13, 69:17, 71:1, 75:6, 75:8, 75:13, 91:3, 91:14, 94:10, 127:14 break 11:13, 49:8, 49:12, 55:7, 58:19, 72:24, 73:20, 73:24, 118:20, 120:2 breakfast 21:17	breaks 101:19 bright 43:15 bring 45:11, 51:8, 52:15, 67:15, 73:21, 128:11 bringing 42:5 broad 116:5 broader 116:5 brother's 102:11 brought 41:15, 50:16, 52:19, 112:14 brown 56:4, 58:3, 117:2 brutality 65:3, 83:9, 110:16 bursts 85:7 business 8:14, 8:19, 23:7 by-laws 16:25, 17:12, 18:14, 18:19, 18:20, 19:2, 135:5, 135:9 <hr/> C <hr/> c) (3) 50:1 c) (4) 50:4 c) (4) s 50:10 caddo 93:10 call 3:6, 24:11, 24:14, 68:24,	76:1, 85:5, 96:19, 96:21, 97:10, 123:16, 129:24 called 14:4, 15:12, 25:3, 39:2, 59:20, 94:21, 104:14 calls 28:7, 41:11, 43:19, 46:10, 46:18, 48:24, 52:9, 53:7, 54:7, 54:12, 54:18, 54:22, 54:25, 55:14, 62:19, 70:13, 72:17, 77:2, 87:11, 88:22, 109:11, 110:9, 113:21, 115:2, 123:16, 129:20 came 91:12, 91:15, 91:21, 98:7, 123:4 campaigns 43:20 can't 78:5, 100:11, 100:12, 109:21, 114:10, 130:9, 133:6, 133:10 canceled 103:13, 104:10 candidate 55:10, 56:8, 56:13, 111:6, 113:19, 114:25, 115:7, 115:25, 116:1, 116:6 candidates 45:21, 46:15, 46:16, 55:19, 59:5, 59:11, 115:8 cannot 69:21	capacity 1:9, 7:19, 107:22, 108:5, 119:23 care 136:12 carolina 137:1, 137:4, 137:16, 137:21 carpenter 117:19, 117:21, 117:22, 118:4, 118:11, 119:15 carpenter's 118:1 carpenters 118:8, 118:9 cars 103:7 case 9:16, 17:23, 88:17, 97:7, 98:21, 98:22, 107:20, 112:14, 112:18 cases 94:9 casino 22:9 cassie 2:16, 7:15, 49:6, 57:9, 70:11, 82:19, 86:18, 89:24, 104:24 cassie's 130:5 caucus 105:12 caused 97:2 census 98:4, 98:7 center 3:14, 14:4, 14:16 certain 28:22, 67:21,
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

143

98:9 certainly 73:1 certainty 128:17 certify 137:6, 137:11 chair 33:4 chairs 23:14 challenge 79:23 challenged 61:25 change 99:15, 101:9, 101:15, 101:22, 101:23, 104:19, 106:16, 106:18, 109:17, 109:24 changes 100:10, 109:16 changing 106:24 chapters 15:1 charge 33:1 charlotte 137:16 check 36:18, 36:19, 36:23 checked 30:12 cheer 85:12 cheered 85:11 cheering 103:21 chief 1:7 choice 45:9, 45:11, 45:21, 46:15, 46:16, 55:11,	55:20, 56:8, 56:14, 56:19, 59:5, 59:11, 98:16, 111:6, 113:19, 115:1, 115:7, 116:7 choose 56:1, 56:18 choosing 115:25, 116:1 city 9:9, 9:13, 9:18 civic 3:14 civil 1:4 civilized 69:1 claim 113:16 claims 97:6, 97:16, 112:13 clarify 49:17, 55:9, 73:11, 79:17 clark 4:8 clear 11:3, 37:5, 55:17 client 46:1, 46:6 clock 73:6 close 129:7 closer 30:15, 133:14 clothes 109:25 coleman 27:13, 27:17 collectively 130:8 college 15:1 columbus 3:16	combat 99:24, 99:25 come 22:2, 22:3, 42:2, 45:4, 65:22, 76:14, 100:11, 101:22, 101:23, 102:14, 116:22, 118:24, 135:3 comes 18:7, 24:10, 116:23, 135:4 comfort 11:13, 49:12, 118:20 coming 32:6, 52:7, 99:11, 131:8 commission 105:20, 105:22, 105:23, 106:2, 106:4, 107:5, 107:25, 108:2, 108:5, 137:5 committee 5:16, 22:22, 22:25, 23:1, 23:3, 23:6, 23:9, 23:14, 23:16, 25:14, 25:25, 118:17 communi 124:13 communications 84:8, 124:11, 124:14, 129:21 communities 97:2, 110:16 company 14:3, 14:7, 14:9, 14:11 compel 79:18, 80:1 compelled 94:10 compile 36:2	complaint 5:18, 39:2, 39:16, 39:20, 50:13, 60:5, 113:1 completely 12:1, 15:22, 39:17 compliance 20:13, 20:15, 30:9, 36:15 complying 36:19, 37:3 computer 15:21 concede 99:23 concerned 27:3 concise 11:3 concluded 136:16 conclusion 28:8, 46:18, 48:25, 55:14, 62:20, 76:15, 91:13, 91:15, 91:21, 113:22, 115:3 conducted 1:19 conference 1:16, 13:4, 13:8, 13:22, 14:18, 16:4, 16:7, 16:11, 19:15, 19:19, 20:2, 20:21, 21:10, 21:13, 22:18, 22:21, 23:2, 23:10, 23:18, 23:22, 24:1, 24:23, 29:12, 29:14, 29:18, 29:23, 30:5, 31:8, 31:22, 34:9,
--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

144

35:2, 35:17, 37:13, 38:18, 40:9, 41:4, 43:1, 45:14, 49:20, 49:23, 55:8, 59:3, 63:16, 64:7, 97:20, 100:15, 102:19, 102:22, 104:22, 104:23, 106:5, 108:23, 111:16, 119:22, 131:4, 134:20 conference's 5:22, 59:21, 60:19, 95:10 conferences 18:23, 26:9 confident 86:10 confidential 82:8 confirm 128:21 confused 70:23, 82:18 confusion 10:18 congressional 53:12 conine 3:5 consent 43:7, 43:22 consented 44:14 constituents 118:5, 118:16 constitution 16:25, 17:11, 18:10, 18:14, 18:19, 18:20, 19:2, 135:4 consult 41:6, 42:3, 42:13, 42:14, 73:14 consultant 14:5, 14:8	consultation 69:7 consulted 17:1, 41:2 cont'd 3:1, 4:1 contact 26:8 contain 25:23, 26:8 context 57:7 continue 14:22, 31:19 contracts 120:13, 120:23 control 41:22 controls 41:24 convention 21:15, 21:19, 21:20, 21:23, 30:15, 30:18, 36:4, 36:5, 36:17, 44:8, 44:24, 52:12, 70:14 conventions 76:3, 76:23, 92:13, 131:4 conversation 70:7, 86:22, 87:7, 130:10, 130:12, 130:13, 131:14, 131:20 conversations 42:11, 71:9, 74:13, 76:13, 130:14, 130:17 cook 100:10 cooper 17:25, 18:1 cooper's 90:12, 92:22 coordinate 14:24	copies 15:20 copy 39:15, 135:17, 136:3, 136:8 corporate 37:16, 49:23 correct 24:13, 46:23, 54:9, 54:12, 59:17, 59:18, 64:13, 79:16, 85:23, 94:6, 113:2, 119:9, 119:10, 121:25, 135:10, 137:9 correctly 38:17, 48:14 cottonport 66:15 could 10:20, 25:17, 26:17, 27:4, 28:23, 33:10, 56:18, 73:21, 74:15, 78:6, 95:7, 95:24, 96:17, 97:16, 100:2, 110:4, 114:11, 114:15, 118:12, 125:11, 126:10, 128:12, 128:16, 128:17, 136:1 couldn't 80:2, 104:21 council 9:19, 9:21 counsel 41:3, 42:11, 69:7, 69:8, 71:9, 71:10, 72:23, 122:6, 122:11, 135:25, 137:8, 137:12 counties 68:9 counting 60:7	country 69:1 county 137:2, 137:21 couple 15:23, 105:2 court 1:1, 7:2, 7:11, 7:21, 9:3, 10:14, 10:19, 48:13, 48:22, 53:15, 57:13, 94:9, 135:21, 135:24, 136:5, 136:9, 136:11, 137:3 courtroom 11:22 courtrooms 91:18 cover 24:15 covered 76:17, 82:21 covers 70:8 cozen 4:11 crackers 66:14 create 80:11 created 90:11 cross-reference 64:8, 72:3, 127:4 cross-referenced 71:12, 71:16, 72:3, 72:10, 126:6, 129:5 cross-referencing 68:10 crow 101:12, 101:13 crr 137:20 culture 58:5
--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

145

cumbersome 107:2	3:3, 5:24, 7:18, 60:20	determine 41:18, 57:9	24:5, 24:9,
curious 126:17	defendant's 6:4, 94:21,	determined 96:22, 97:11	24:18, 26:10,
current 8:13, 8:23, 13:3, 80:5	95:11	determines 33:16, 33:17	26:20, 61:25,
currently 30:11, 37:10	defendants 121:6	dick 1:8	62:17, 64:20,
cut 26:18, 98:25	defense 2:6	difference 19:6	66:24, 67:2,
cycle 40:16, 45:24	definition 55:10	different 24:14, 116:11,	67:25, 69:12,
D	demand 40:22	dinner 22:8	70:8, 77:9,
daily 21:4, 46:5	democrat 114:20	direct 79:8, 79:12,	77:13, 77:17,
dakota 4:10, 8:25	democratic 54:6, 102:9	82:6, 82:7,	78:12, 79:6,
damaged 100:16	demographer 17:21	82:17, 89:18,	79:10, 79:15,
date 40:5, 50:17, 88:20, 123:8, 123:10	denial 80:1	94:1, 115:15,	80:17, 80:19,
day 35:8, 65:24, 101:23, 103:9, 123:15, 137:16	denied 79:19, 80:5, 80:10	122:15, 129:22	80:22, 83:5,
deal 32:23, 65:3, 65:5, 86:25	department 20:19	directors 22:19	83:6, 83:10,
dealing 40:14, 53:8	depends 21:5, 36:3, 77:12	dirty 67:17	85:16, 87:20,
deceased 35:11	deponent 136:14	discover 6:5	88:14, 89:14,
decided 70:18, 70:21	deposed 9:2, 10:1	discovery 94:22, 95:12, 97:12	89:15, 89:16,
decision 40:24	deposition 1:15, 2:1, 5:14, 7:16, 8:2, 9:1, 9:7, 16:3, 16:21, 22:15, 29:25, 39:24, 79:21, 134:9, 135:15, 136:16	discrepancies 131:10	89:21, 114:7,
declaratory 5:19, 39:21	description 5:12, 6:2	discussed 71:9, 113:6, 120:3	114:12, 117:13,
declare 48:18, 48:22	desegregation 65:8	discussing 55:7	117:14, 117:15,
deemed 20:13	designee 16:10	discussions 42:10, 69:7	118:1, 124:9,
defendant 1:12, 2:15,	determination 91:7	dispute 25:16	124:16, 125:4,
		dist 67:10	125:22, 125:23,
		distressed 99:7	126:13, 126:22,
		district 1:1, 1:2, 7:21, 15:8, 23:24,	127:2, 128:6,
			128:22, 128:23,
			128:24, 128:25,
			129:10, 129:14,
			129:18, 130:11,
			130:23, 131:15,
			131:23, 132:2,
			132:6
			districts
			46:3, 56:2,
			62:14, 62:24,
			63:8, 63:22,
			64:10, 66:4,
			68:5, 68:6,
			68:14, 70:5,
			70:20, 71:3,
			72:22, 74:2,
			74:4, 74:8,
			74:16, 74:18,
			74:22, 75:2,
			75:14, 76:5,
			76:6, 76:9,
			76:11, 77:5,
			78:13, 78:17,
			81:8, 81:14,

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

146

81:21, 82:1, 82:13, 83:21, 83:23, 84:4, 84:16, 85:14, 85:22, 86:2, 86:10, 86:16, 87:2, 87:17, 88:25, 89:6, 90:11, 90:12, 90:14, 90:16, 90:22, 91:5, 92:8, 92:15, 92:16, 92:21, 92:23, 93:2, 94:5, 116:12, 116:14, 131:7, 132:11, 132:16, 132:24, 133:21 diverse 56:15, 77:7, 77:25, 78:4, 89:11 diversity 78:5, 89:12 diverted 102:16, 102:25, 103:1 dock 100:12 document 15:12, 15:25, 25:3, 25:11, 39:2, 39:9, 39:19, 39:23, 59:20, 60:9, 60:13, 60:17, 74:6, 94:7, 94:20, 95:5, 95:9, 95:19 documents 5:28, 17:12, 18:4, 60:22, 76:14, 81:25, 91:6, 121:18, 123:18, 124:3 doing 22:3, 53:2, 64:16, 65:23,	86:12, 86:19, 98:25, 105:16, 110:11 done 27:15, 49:8, 49:10, 54:5, 64:1, 70:12, 94:18, 106:14, 107:7 dorothy 1:4 double 103:5 doubting 67:21 down 13:7, 17:2, 18:11, 22:3, 26:3, 26:16, 28:17, 48:6, 62:2, 62:6, 63:8, 66:18, 72:15, 72:20, 77:3, 90:4, 95:1, 102:14, 103:22, 109:20, 109:23, 110:1, 110:8, 123:9 downsize 104:5, 104:18 dr 1:4 draw 56:17, 125:7 drawn 111:11, 129:7, 131:11 drive 3:14, 8:18 dues 12:9, 12:22, 28:15, 29:9, 29:10, 31:14, 31:19, 31:23, 31:25, 32:4, 32:18, 32:19, 33:2, 68:19 duly 7:7	dumps 110:8 during 9:19, 30:17, 44:7, 51:6, 52:25, 98:3 duties 14:20, 14:22 <hr/> E <hr/> e-mail 26:22, 26:25 each 26:23, 36:25, 61:25, 62:13, 66:3, 66:20, 74:8, 75:1, 76:8, 76:11, 77:5, 81:7, 82:1, 82:13, 83:20, 84:16, 87:25, 88:13, 90:10, 92:20, 94:4 earlier 30:7, 54:8, 64:11, 68:4, 86:7, 113:7, 115:23, 119:8, 121:17, 127:3, 134:19 early 107:16, 108:9, 108:10 easier 10:19, 15:21, 99:10, 99:12, 107:2 easily 68:12, 103:21 east 93:9 easy 68:11, 91:3, 93:8 eat 67:16, 83:7 eaten 66:14, 91:19	economically 112:6 educational 2:7 effective 35:5, 35:6 efforts 105:7 eight 24:2, 24:3, 26:12 either 33:13, 68:18, 68:19, 106:14 elect 45:21, 46:15, 55:19, 59:5, 59:11, 111:5, 113:19, 115:24, 116:13 elected 13:15, 14:18, 97:3, 118:14 election 115:1, 132:7 elections 102:5, 120:10, 132:3, 133:19 electronic 106:11 else 18:7, 52:17, 72:1, 130:18 elude 123:3 eludes 105:14, 105:17, 114:9 emotionally 99:7, 112:5 employ 43:16, 43:17, 43:23, 86:24, 87:1 employed 51:16 employee 13:21
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

147

employees 21:11 enacted 97:2, 97:21, 102:16, 103:14, 105:8, 108:24, 109:8, 111:6, 111:17, 113:20, 118:2 enactment 97:25 encourage 100:2 encouragement 100:2 end 26:6, 45:6, 45:7, 77:3, 122:1 endurance 11:12 engage 104:14 enough 10:9, 33:22, 58:17, 66:21, 116:23, 117:1, 118:8, 118:13 entered 8:1, 8:25, 22:14, 29:24 entire 39:10, 40:18, 42:19, 47:16, 47:18, 48:22, 60:9, 88:7 entities 50:9 entitled 47:11 entity 49:24 erica 121:8, 122:21, 136:6 erika 3:12 escort 9:22	esq 2:8, 2:9, 2:10, 2:16, 2:17, 3:4, 3:5, 3:12, 4:8, 4:9, 4:10, 4:13, 8:1, 8:25, 22:14 est 1:21 establish 46:24 et 1:5 even 79:22, 80:14, 80:21, 89:3, 123:10 event 22:10, 137:14 events 21:17, 103:12 ever 9:2 every 41:7, 44:24, 52:8, 62:17, 65:19, 67:9, 73:5, 76:25, 79:14, 80:16, 89:21 everybody 8:9, 68:24, 111:11, 116:6 everyone 35:3, 45:10, 116:3 everything 123:9 exact 57:10 exactly 80:16 examination 5:5, 5:7, 5:9, 7:13, 121:11, 134:16 examined 7:9, 137:8 examining 108:9	example 117:12, 124:9, 128:24 excellent 15:17, 16:15 excited 75:15, 98:9, 98:15, 99:1, 99:10, 99:13, 99:17, 101:3, 101:5, 102:8, 102:13, 104:16, 104:17, 104:25, 105:4, 109:13, 109:16 excuse 28:6, 37:13, 44:2, 60:1, 64:20, 98:21, 108:10 executive 5:15, 22:22, 22:24, 23:1, 23:3, 23:9, 23:14, 23:16, 25:14, 25:25 exhibit 5:13, 5:15, 5:18, 5:21, 6:3, 15:14, 15:15, 15:24, 16:15, 16:18, 16:22, 17:11, 18:12, 25:4, 25:6, 28:18, 39:3, 39:5, 49:11, 59:23, 59:25, 60:1, 60:2, 60:5, 61:1, 73:22, 94:18, 94:23, 94:24, 113:2, 113:5, 121:21 exhibits 135:22, 136:4, 136:9 expand 57:6	expanded 56:2 expanding 57:4, 108:10, 115:23, 116:2 expands 107:14 expected 19:1 expert 17:23 expires 137:5 explain 40:13, 55:12 explained 134:23 explanation 31:10 extent 42:6, 43:10, 44:11, 46:17, 55:14, 66:7, 82:20, 84:7, 111:20, 124:12, 129:19 eyes 90:3 <hr/> F <hr/> face 65:25, 100:8, 101:7 faced 97:4 facilitate 14:24 fact 69:3, 72:14, 72:16, 75:7, 76:5, 84:15, 96:20, 133:17 failed 32:19 fair 10:9, 24:18, 29:21, 31:7, 33:23, 45:8,
-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

148

58:17, 81:20, 92:1, 135:7 faith 100:6, 100:7, 100:22, 100:24 fall 20:11 fallen 34:21 familiar 9:25, 16:23, 18:15, 28:14, 34:8, 41:25, 65:18, 65:19, 65:20, 66:2, 85:13, 95:5, 104:3, 104:7, 105:19, 107:9, 107:12, 107:16, 112:12, 117:20, 117:21 familiarize 48:9 families 101:18, 101:19 family 34:18, 110:9 far 95:5 federal 123:23 feel 76:20, 110:4 fees 31:25 fell 128:23 festivals 83:8 few 7:24, 10:11, 55:25, 97:17, 118:18, 121:14, 134:13 fifth 2:12 fighting 45:2	file 20:5, 20:12, 20:14, 51:24, 52:21, 53:19 filed 79:18 filing 40:5, 42:16, 44:4, 44:15 filled 110:23 finally 99:2, 110:4 finances 103:1 financial 20:5, 20:18, 20:19 financially 112:5 find 34:17 fine 15:22, 39:17, 63:5, 73:8, 73:10, 73:13, 73:16, 109:23 finish 10:21, 10:23, 11:15 finished 61:16, 96:8 firm 7:17 first 5:25, 5:26, 6:4, 7:7, 20:13, 27:23, 28:4, 28:5, 40:2, 50:16, 60:20, 60:21, 61:19, 62:4, 78:20, 80:15, 94:22, 95:11, 97:18, 124:23 five 13:14, 51:1, 51:3, 73:5,	117:6 five-minute 49:8, 72:24 fix 84:24 floods 85:2 floor 2:12 flower 34:19 focus 122:3 folks 47:8, 58:25, 59:14 follow 19:1 follow-up 121:15 following 62:14, 81:8 follows 7:10 font 40:3 football 65:13, 67:16, 83:7, 91:17 foregoing 137:8 forever 13:13 forgot 53:13 form 14:14, 106:21 four 26:11 framework 18:21 free 21:21, 76:20 freedom 21:15, 64:25, 76:24, 83:8 freely 107:3	friday 1:20, 22:10 friend 115:6, 133:11, 133:13 friends 46:9, 88:22 full 8:4, 137:9 fund 2:7, 21:15, 65:1, 76:24, 83:8, 97:8 funded 21:13, 21:14 funds 21:17 funerals 66:19, 72:18 further 96:4, 121:4, 135:11, 135:16, 136:14, 137:11 future 106:1, 107:8, 132:3, 133:18 <hr/> G <hr/> gained 98:8 galas 76:25 games 65:13, 83:7 gave 14:14, 27:20 geared 98:3, 100:17, 102:10, 104:17 general 35:7, 41:3, 71:10, 113:17, 130:13, 130:16, 131:5 general's 4:6 generally 9:17, 107:14
--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

149

<p>getting 22:17, 36:3, 63:11, 67:23, 98:25, 100:17, 102:10, 102:12, 104:17, 109:15</p> <p>giglio 4:9, 8:1</p> <p>give 10:15, 10:21, 27:17, 39:11, 48:8, 51:8, 52:16, 59:10, 71:8, 118:13</p> <p>given 100:2, 137:15</p> <p>gives 69:6</p> <p>glad 22:7, 45:16</p> <p>global 44:19, 44:20, 87:4</p> <p>go 11:12, 17:2, 21:4, 22:2, 26:5, 32:5, 32:23, 35:19, 36:4, 44:10, 44:12, 45:25, 46:1, 46:4, 49:11, 51:18, 52:20, 60:15, 65:10, 67:21, 68:21, 70:1, 72:7, 72:9, 73:4, 77:3, 81:2, 83:7, 83:8, 83:9, 83:11, 85:15, 90:1, 90:3, 91:22, 91:23, 91:24, 96:4, 100:3, 101:5, 101:16, 102:2, 103:10, 103:17, 103:20, 104:13, 104:15, 109:21,</p>	<p>112:24, 118:4, 120:20, 127:15, 127:16, 127:17, 127:18, 128:11, 130:25</p> <p>goes 30:7, 31:25, 109:22, 109:23, 118:6</p> <p>going 10:10, 11:2, 11:9, 15:11, 15:23, 22:8, 22:9, 24:11, 28:9, 40:17, 40:20, 45:1, 45:8, 49:12, 52:9, 52:18, 53:10, 70:18, 73:6, 75:5, 76:23, 76:24, 78:6, 79:14, 80:18, 89:20, 90:19, 97:17, 98:10, 98:14, 98:15, 99:1, 99:5, 99:15, 100:5, 100:9, 100:25, 101:9, 101:21, 102:6, 102:13, 103:4, 103:5, 104:5, 106:13, 110:12, 110:24, 117:9, 117:11, 134:9</p> <p>gone 8:7, 64:24, 65:2, 65:4, 65:6, 65:9, 65:12, 65:13, 66:11, 66:12, 66:13, 66:17, 66:20, 66:21</p> <p>gonna 98:20, 101:15, 101:22, 101:23, 103:3, 104:6, 107:7</p>	<p>good 7:2, 7:15, 10:24, 10:25, 11:4, 11:7, 20:1, 29:6, 29:10, 30:2, 30:4, 30:6, 30:11, 30:19, 31:1, 31:2, 31:6, 31:10, 31:20, 51:22, 54:21, 54:22, 58:1, 68:15, 68:21, 69:25, 75:25, 88:3, 88:20, 89:2, 99:21, 99:22, 100:16, 106:17, 110:11, 118:19, 118:21, 118:22</p> <p>gotten 69:23, 116:4</p> <p>government 104:18, 121:1</p> <p>grandkids 110:14</p> <p>great 8:21, 11:1, 12:3, 13:11, 17:3, 17:9, 18:2, 19:13, 19:24, 22:4, 22:9, 29:19, 31:17, 39:22, 40:7, 45:19, 45:20, 47:23, 50:8, 58:2, 58:5, 58:7, 58:14, 61:13, 62:3, 62:16, 95:8, 96:10, 105:5, 119:2, 119:3, 134:2</p> <p>greater 56:5, 59:10, 59:11</p> <p>greatest 52:15</p>	<p>grew 101:12, 101:13</p> <p>grieve 85:7</p> <p>ground 10:11</p> <p>grounds 115:16</p> <p>groundwork 18:21</p> <p>group 14:12, 70:18, 70:21</p> <p>grow 101:12</p> <p>guess 73:3</p> <p>guest 41:14, 41:15, 41:19, 105:3</p> <p>gumbo 57:24, 58:14, 58:20, 66:14</p> <p>guy 133:12</p> <hr/> <p style="text-align: center;">H</p> <hr/> <p>hall 104:3</p> <p>halls 104:10</p> <p>hand 7:4, 107:21, 111:12, 111:13, 137:15</p> <p>happen 98:17, 102:13, 110:13</p> <p>happened 99:14</p> <p>happening 107:6, 109:16</p> <p>happens 32:14, 33:24, 35:16, 51:12, 52:4, 110:16, 116:4</p> <p>happily 43:14, 107:3</p>
--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

150

happy 11:15 hard 15:19, 39:15, 54:19, 118:25 harder 99:9 harm 96:25, 97:19, 100:14, 101:10, 101:19, 108:22, 109:2, 109:5, 109:7, 113:13, 113:17, 116:14, 116:17, 116:21, 120:3, 120:17 harmed 111:16, 117:1, 117:4, 118:1, 118:17 harmony 14:4, 14:16 harms 101:20 hb 48:18, 49:3 head 63:3, 77:19, 77:23, 77:24, 81:16, 83:24, 87:15, 114:10 headed 92:18 headquartered 18:21 healthcare 83:12, 83:13, 110:20, 110:21 hear 54:10, 78:20, 99:24, 132:21 heaven 52:16, 123:4 held 2:1 help 10:12, 85:7, 108:16, 117:17,	123:12 helped 84:24, 118:16 here 8:9, 11:20, 14:4, 16:6, 16:17, 19:11, 42:20, 49:19, 53:10, 57:24, 78:14, 85:13, 88:24, 89:23, 91:19, 91:20, 103:4, 107:22, 119:21, 122:1 highway 8:19, 21:1 hillsborough 2:19 hispanic 98:22 hispanics 58:12 history 43:15, 58:6, 100:19 hmm 116:10 hold 14:17 holt 2:16, 5:5, 7:14, 7:15, 15:17, 15:18, 16:14, 18:11, 25:2, 25:8, 25:20, 26:2, 26:5, 26:15, 28:9, 28:17, 39:1, 39:7, 39:13, 40:1, 40:4, 46:21, 47:1, 47:3, 47:22, 48:5, 49:10, 49:15, 49:16, 57:12, 57:17, 59:19, 60:1, 60:6, 60:11, 60:15,	60:25, 61:2, 61:10, 62:2, 73:1, 73:9, 73:14, 73:19, 73:21, 79:13, 79:23, 80:9, 80:18, 80:21, 80:24, 81:1, 82:7, 82:9, 82:10, 82:18, 82:24, 86:17, 89:19, 89:23, 89:25, 90:5, 94:2, 94:18, 95:1, 95:3, 95:7, 95:18, 95:24, 96:5, 96:11, 108:3, 112:25, 113:4, 114:6, 115:16, 115:21, 118:18, 118:23, 119:3, 119:5, 119:7, 120:16, 121:4, 134:8, 134:15, 135:13, 135:23 home 14:3, 14:6, 66:5, 66:20, 67:3, 85:15, 128:10 homes 66:11, 66:13, 67:12, 67:13, 67:18, 67:19, 67:22, 71:24, 85:11, 85:12, 91:17 honestly 12:1 hope 29:8, 45:17, 56:16, 110:5, 110:7, 133:24 host 21:16, 131:6 hostetler 3:13	hotel 103:8 hour 49:13 hour's 122:2 house 47:17, 49:3, 53:12, 55:24, 63:8, 64:19, 68:6, 81:8, 81:13, 81:21, 82:1, 82:13, 83:5, 83:21, 83:22, 83:23, 84:4, 84:16, 84:24, 84:25, 85:14, 85:16, 85:21, 86:2, 86:9, 86:16, 87:2, 87:17, 87:20, 88:14, 88:25, 89:4, 89:6, 89:14, 89:15, 89:16, 89:21, 90:14, 98:12, 100:23, 101:4, 117:13, 124:9, 124:16, 125:3, 125:22, 125:23, 126:11, 126:12, 126:21, 127:2, 128:5, 128:12, 128:16, 128:22, 128:23, 128:24, 129:18, 130:10, 130:23, 131:7, 131:15, 131:23, 132:2, 132:6, 132:8, 132:11 houses 85:9, 125:24 however 82:22, 84:9 hurricane 85:3 hybrid 106:14
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

151

I			
identifi	illegal	individual	interrogatories
126:20	17:15, 40:20,	37:25, 97:9,	5:26, 16:24,
identification	48:23, 52:19,	109:7, 119:23	60:21
15:15, 25:6,	78:25, 83:4,	individually	interrogatory
39:5, 60:2,	83:17, 90:25,	29:14, 87:3,	17:4, 17:6,
74:1, 94:24	91:11, 97:25,	87:14, 88:10,	17:7, 17:10,
identified	98:12, 123:21,	130:6, 130:7	61:15, 75:21,
32:15, 62:12,	126:7, 131:10	individuals	86:1, 94:5,
63:16, 63:21,	illegally	76:10	95:21, 96:6,
67:1, 67:24,	111:11	information	96:7, 121:20,
69:3, 69:12,	illustrative	26:9, 27:5,	122:4, 122:7,
74:4, 77:17,	17:17, 17:19,	27:18, 42:7,	123:7, 123:20,
79:5, 79:10,	64:3, 71:13,	43:11, 76:17,	124:7, 125:20,
81:6, 82:13,	74:12, 78:25,	79:19, 80:7,	126:19, 126:25,
83:20, 89:6,	83:3, 83:17,	92:4, 96:24,	127:23, 128:20,
89:16, 90:9,	90:13, 90:14,	114:4, 115:18,	129:16, 130:22,
93:12, 93:15,	90:16, 90:22,	129:24, 135:20	131:17, 132:13,
94:4, 97:10,	90:24, 91:12,	informed	132:17, 132:25
98:7, 124:19,	92:8, 92:23,	53:9	interrupt
124:20, 124:22,	123:22, 126:6	initial	97:15, 131:12
124:23, 124:25,	imagine	17:5	intervenor
125:25, 129:8,	12:8, 19:21,	injunctive	3:11, 121:10,
129:13, 130:24,	32:20	5:20, 39:21	136:7
131:4, 132:12,	important	installation	intimately
132:16, 132:25	106:5, 106:25,	127:17	133:15
identify	108:11	instance	introduced
27:4, 34:4,	improper	56:12, 59:12	17:18
61:24, 71:4,	79:21, 80:14	instructing	invite
74:15, 77:19,	inadequate	125:14	71:8
87:19, 88:25,	83:12	instruction	invited
90:21, 91:3,	inc	79:14, 89:20	35:7
92:7, 93:22,	2:7	instructions	invites
122:17, 124:8,	include	134:11, 135:16	69:6
124:14, 124:17,	56:3, 58:20,	intend	involved
124:18, 125:2,	61:11, 96:22,	79:23, 133:18	40:9, 40:10,
125:10, 125:20,	96:24	intends	53:13, 53:16,
126:3, 126:10,	included	96:19, 132:2	120:3
126:20, 127:1,	70:19	interchangeable	involvement
127:4, 127:19,	includes	19:11	44:9
128:4, 128:13,	28:25, 111:22	interest	issue
128:15, 128:17	including	131:5	65:7, 73:12
identifying	71:10, 90:13,	interested	issues
74:18	97:7	137:13	41:10, 45:1,
identities	inclusive	interests	45:3, 51:13,
28:3, 97:11	28:24, 29:1	119:18, 120:1	53:7, 70:14,
identity	income	internally	86:24, 97:4
67:2	13:25, 14:15	112:5	itself
	indeed	international	27:12
	103:18	20:20	

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

152

J	123:10	78:1, 88:1,	87:5, 88:4,
jack	kin	90:1, 90:7,	91:4, 91:25,
4:16, 29:24	99:19	95:19, 96:14,	105:13, 127:7
jackson	kind	115:1, 132:7	least
4:18	30:14, 39:10,	lastly	20:4, 30:25,
jaguars	39:11, 39:13,	11:19	31:2, 36:15,
85:11	94:15	later	36:19, 51:5,
jim	kinds	114:11	62:12, 63:17,
101:12, 101:13	22:12	law	63:20, 66:3,
job	knehans	7:17, 47:11,	67:8, 67:11,
1:23, 11:4	4:10, 8:25	101:13, 107:6	67:24, 69:14,
john	knew	lawsuit	71:18, 81:6,
3:4, 3:5	40:16, 40:21,	40:9, 40:10,	82:12, 83:20,
johnson	98:10	42:5, 43:8,	84:3, 84:4,
1:10	knowing	44:3, 51:9,	84:15, 88:13,
join	83:19	51:25, 52:21,	90:9, 128:15
40:24, 43:14,	knowledge	53:13, 53:19,	leave
43:22, 44:3	29:3, 61:8,	70:22, 131:1	134:9
jr	72:14, 78:18,	lawyer's	leaving
3:5	78:23, 82:12,	60:7	135:15
judge	83:18, 92:2,	lawyers	leg
1:7, 1:9, 11:22	92:3, 113:24,	17:1, 52:15,	59:8
judgment	113:25, 124:5,	74:11, 75:12,	legal
5:19, 39:21	127:6	78:24, 83:19,	2:6, 28:8,
june	known	91:1, 91:9,	46:18, 46:23,
90:13	86:11, 87:24,	92:4, 122:23,	47:1, 48:25,
jurisdiction	87:25	129:4	55:14, 62:20,
24:12, 24:15,	kyle	ldf	64:2, 71:12,
24:20, 70:8	1:8, 7:18	122:22, 122:23,	74:12, 113:22,
jury	L	122:25	115:3
11:22	la	leader	legislation
K	3:8	87:7	108:16, 116:22,
keep	lack	leaders	116:25, 117:3,
29:8, 30:14,	23:3, 28:15,	74:17, 74:23,	118:7, 118:15
53:9, 86:19,	37:15, 97:3,	74:25, 75:20,	legislative
92:14, 98:14,	98:2	85:25	3:11, 56:6,
99:5, 100:6,	lagroue	leadership	59:9, 98:4,
100:7, 101:18,	4:5	42:25, 51:1,	98:5, 105:6,
122:2, 131:13	large	53:4, 53:5,	116:12, 121:9,
keeps	38:5	53:24, 65:18,	136:7
30:8, 73:6	larger	65:20, 69:16,	legislative-crea-
kicking	68:5	69:18, 69:19,	ted
83:10	last	69:22, 69:24,	105:23
kids	9:11, 10:8,	70:3, 71:18,	legislature
83:10, 89:3,	16:15, 30:17,	71:20, 74:21,	46:10, 56:7,
101:11, 110:13,	51:17, 54:10,	75:10, 76:7,	58:7, 58:11,
	61:1, 66:15,	76:9, 76:12,	58:12, 58:15,
		86:6, 86:25,	118:6, 118:12,

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

153

120:4, 120:12 less 34:5, 112:8 let's 8:15, 11:19, 25:20, 26:17, 44:10, 44:12, 46:1, 51:18, 52:20, 52:21, 81:2, 81:17, 89:14, 95:25, 101:2, 101:18, 118:24 lied 101:8 life 12:10, 12:11, 12:12, 12:13 lifetime 10:5 likely 96:22, 97:7, 125:6 liken 99:19 limited 55:25, 57:5, 58:9 line 49:9 lines 106:19, 106:23, 129:7 list 34:23, 35:12, 35:13, 36:23, 36:24, 41:16, 72:4, 74:6, 74:9, 74:10, 79:15, 81:24, 82:2, 91:8, 123:24 listed 16:18, 26:13, 27:22, 62:17, 78:14, 81:21, 85:22, 89:23, 94:5	lists 35:21, 66:24, 70:25, 121:19 literally 83:11, 92:16 litigation 27:24, 40:25, 41:5, 42:16, 43:21, 44:4, 44:15, 45:12, 45:15, 47:15, 50:15, 51:17, 51:18, 55:9, 70:9, 76:3, 77:2, 77:4, 92:18, 92:19, 120:15 little 9:25, 10:19, 14:6, 26:5, 40:2, 40:13, 70:23, 73:5, 82:18, 95:15, 96:4, 99:9, 100:13, 114:11, 116:11, 133:13 live 24:7, 24:9, 24:19, 33:10, 33:14, 42:21, 67:5, 74:15, 76:11, 79:5, 84:20, 91:4, 92:7, 110:14, 114:8, 128:18 lived 87:19, 87:24, 128:9 lives 33:17, 46:5, 69:18, 74:8, 76:8, 79:5, 80:22, 81:7, 82:1, 84:4, 89:16, 90:22, 91:2, 91:4, 92:20, 117:25, 124:9, 124:15,	125:3, 125:21, 126:21, 127:2, 129:13, 129:17, 130:23, 131:23, 132:2, 132:6 living 61:25, 63:21, 70:4, 84:16 llp 2:18 local 12:18, 42:4, 42:16, 42:18, 42:20, 42:22, 44:2, 70:7, 70:25, 94:10, 121:1 located 33:8, 33:14, 33:15, 68:11, 77:13, 91:14, 126:13, 127:5 locations 107:15, 108:9, 108:10 long 12:7, 13:12, 29:9, 60:24, 106:23, 123:13 longer 73:5, 98:22, 106:20, 118:21 look 15:20, 22:3, 27:14, 32:6, 32:7, 32:22, 35:25, 36:1, 36:12, 39:16, 46:11, 58:3, 58:4, 62:2, 70:1, 73:6, 74:9, 100:10, 110:12, 111:1, 111:10, 112:24, 117:2, 129:11, 130:25 looked 16:22, 17:15,	17:17, 18:4, 50:12, 52:18, 64:1, 64:3, 67:7, 69:15, 71:11, 83:3, 90:24, 91:10, 91:11, 112:13, 118:11, 123:21, 123:22, 124:1 looking 15:21, 61:13, 68:7, 68:9, 78:24, 78:25, 79:1, 83:16, 83:17, 104:13, 104:15, 123:8, 131:7 looks 13:14, 70:17, 98:16, 118:9 lopsided 52:19 lord 34:6, 46:12 losses 85:8 lot 46:14, 57:25, 66:13, 68:5, 87:10, 99:12 loud 48:17, 61:22, 62:9, 62:10, 81:5, 90:7, 96:18 louis 3:7 louisiana's 100:19 louisianan 64:23, 83:1, 90:23, 103:20 louisianans 97:5 lousyana 53:18, 99:5 love 22:13, 67:15,
----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

154

109:15 low 109:20, 110:1 lsu 67:15 lunch 122:2 lying 100:16, 101:8 <hr/> M <hr/> ma'am 8:11, 89:22 machine 106:11 machines 107:7 made 37:18, 40:24, 47:8, 49:20, 57:22, 57:25, 86:11 magistrate 1:9 maintain 20:3 majority 59:13 majority-black 90:11, 90:12 majority-minority 46:4, 98:11, 102:7 make 10:13, 10:15, 10:19, 23:13, 23:14, 31:9, 42:9, 46:10, 47:8, 47:14, 48:1, 49:18, 56:3, 58:25, 68:13, 69:5, 71:7, 91:7, 102:24, 104:6, 107:1, 109:24, 129:5 makes 58:1, 58:2,	99:9 making 7:23 man 100:15, 109:22 manager 14:3 manpower 98:18, 99:8, 103:1 many 19:18, 23:25, 37:1, 37:9, 37:20, 37:22, 42:24, 42:25, 43:16, 45:1, 54:22, 62:24, 64:24, 65:2, 65:4, 65:6, 65:9, 65:12, 67:17, 71:16, 75:8, 75:25, 81:13, 83:22, 83:23, 85:9 map 48:23, 49:2, 49:3, 71:14, 72:3, 72:4, 93:3, 118:13, 123:23, 124:1 maps 17:15, 17:17, 17:19, 17:21, 45:8, 47:19, 56:17, 59:4, 64:2, 64:3, 68:8, 71:12, 71:13, 72:10, 72:13, 74:12, 78:24, 78:25, 83:3, 83:4, 83:17, 90:24, 90:25, 91:11, 91:12, 97:3, 97:21, 97:25, 98:13, 102:6, 102:17, 103:14, 105:8, 108:24,	109:8, 111:7, 111:11, 111:17, 113:20, 118:2, 120:8, 123:21, 123:22, 126:6, 126:7, 131:10, 131:11 march 137:5 marches 43:18 mark 36:19, 59:23 marked 15:14, 15:15, 25:4, 25:6, 39:3, 39:5, 60:2, 94:23, 94:24 marksville 66:16 matter 50:13, 97:8, 118:5 matters 9:5, 10:3 maybe 53:23, 53:24, 84:7, 102:10, 102:11, 104:2, 118:12, 123:3, 130:6 mcclanahan 1:18, 2:1, 5:3, 7:3, 7:6, 7:23, 8:6, 12:4, 15:19, 16:16, 18:13, 24:22, 25:9, 39:8, 43:25, 45:13, 46:6, 46:19, 47:5, 47:24, 49:17, 55:15, 55:17, 57:11, 57:18, 60:10, 60:12, 61:3, 61:14, 65:23, 67:20, 69:6,	70:6, 70:23, 71:8, 73:20, 73:24, 74:4, 76:19, 79:4, 79:9, 80:21, 81:4, 81:12, 82:11, 82:22, 83:22, 84:9, 88:16, 88:24, 90:6, 90:18, 94:3, 95:2, 95:4, 95:20, 96:2, 96:6, 96:13, 96:23, 97:14, 105:19, 107:9, 107:21, 108:1, 108:4, 109:15, 110:10, 110:24, 111:4, 112:12, 112:23, 113:5, 113:23, 114:7, 115:20, 115:22, 119:8, 119:21, 121:13, 122:5, 132:19, 134:4, 134:14, 134:18 mcclanahan's 96:23, 121:24 mean 30:13, 32:17, 42:13, 42:19, 46:16, 53:23, 54:13, 56:22, 57:19, 63:16, 68:15, 74:24, 77:22, 77:23, 102:19, 131:12 means 23:12, 37:2, 37:4, 43:23, 63:20, 71:20, 86:7, 88:7 meant 46:22 mecklenburg 137:2, 137:21 media 43:20
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

155

medication 83:12	64:9, 64:18, 64:19, 65:13, 65:22, 66:2, 66:5, 66:22, 67:21, 68:13, 68:21, 69:15, 70:19, 71:1, 71:2, 71:5, 72:17, 72:20, 74:1, 74:15, 75:13, 76:4, 76:6, 77:4, 77:6, 77:9, 78:2, 83:5, 83:14, 84:16, 84:18, 86:23, 89:5, 91:4, 92:7, 93:11, 93:14, 93:24, 94:4, 97:1, 98:6, 100:3, 100:23, 102:2, 102:5, 108:23, 109:7, 109:12, 110:2, 110:8, 111:15, 111:22, 113:14, 113:17, 116:14, 116:18, 120:5, 120:7, 128:14, 133:22	88:4, 88:12, 89:10, 91:2, 91:13, 91:24, 127:14, 127:22, 134:19, 134:24, 135:2, 135:7 membership's 75:15 memberships 32:22, 52:24, 104:14 memorial 34:3 memory 67:19, 126:16 mentioned 18:9, 20:17, 21:19, 23:20, 23:24, 24:23, 35:11, 58:19, 104:9, 119:8 merely 82:20 met 51:2, 51:5, 65:25, 121:14, 122:6, 122:17, 122:25, 123:2, 123:14, 123:15 method 51:17 methods 43:16, 51:16, 86:23, 87:2 michael 1:18, 2:1, 5:3, 7:6, 8:6, 96:23 middle 1:2, 7:21 might 26:18, 35:24, 58:16, 65:18, 65:24, 66:20, 67:9, 116:4, 116:21, 118:4, 118:19, 124:23, 124:24, 126:10, 128:16, 129:7	mike 46:1 mind 18:7, 19:7, 19:9 mindset 99:16 mine 112:9, 114:15, 133:12, 133:13 minimum 28:19 minorities 59:13 minorities 59:13, 118:14 minute 48:8 misheard 122:19 missing 63:12 mission 14:23, 43:18, 43:23, 43:24, 96:25 misstates 121:23 mix 56:5, 57:6 moment 49:7 monday 41:7, 41:11, 52:9, 54:7, 54:18, 54:25, 76:1, 88:22 monitor 30:5 monitors 20:8 month 54:24 monthly 32:11, 54:12 more 26:11, 34:5, 40:3, 40:13,
----------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

156

45:22, 56:3, 56:15, 57:19, 84:1, 84:23, 107:2, 118:10, 118:18, 133:7, 133:15 morning 7:2, 7:15 most 67:13, 67:18, 77:15, 110:6, 126:8 motion 79:18, 79:25, 80:1 motions 134:10, 135:16 move 10:12, 28:9, 28:10, 84:19, 101:15 moved 20:25 much 18:6, 22:16, 34:13, 103:5, 106:8, 118:21 mullins 2:18, 7:17 multiple 24:16, 33:21 murder 9:21 myself 91:23, 101:6	37:11, 37:25, 38:18, 40:19, 41:4, 43:14, 43:22, 53:1, 59:20, 60:18, 64:7, 69:8, 69:13, 75:16, 94:10, 94:14, 95:10, 96:22, 101:20, 107:1, 107:23, 108:6, 108:11, 109:21, 135:5, 135:8 naacp's 6:3, 28:3, 43:22, 94:21, 96:25 naifeh 2:10 nairne 1:4, 7:20 name 7:15, 8:4, 8:6, 8:7, 14:11, 34:22, 55:4, 117:19, 124:8, 124:15, 124:21, 124:22, 124:23, 124:24, 125:3, 125:8, 125:11, 126:21, 127:1, 127:9, 127:11 names 25:24, 26:8, 26:23, 35:24, 36:1, 74:7, 81:25, 94:11, 122:25, 123:10, 124:1 national 12:17, 20:6, 20:10, 23:5, 30:8, 31:24, 31:25, 32:2, 32:8, 35:9, 35:18, 36:4, 36:17, 38:13, 50:3, 50:6,	69:20 nationality 28:25, 56:4 native 64:22, 83:1, 87:23, 90:23, 103:20 navigation 126:11 nc 2:21 need 10:13, 11:13, 21:8, 30:24, 31:19, 50:14, 59:4, 73:11, 73:14, 80:10, 90:2, 90:3, 103:6, 103:8, 111:1, 135:19 needed 56:15 needs 24:19 neither 137:11 nelson 2:18, 7:17 never 36:24 new 2:13, 23:7, 33:11, 35:1, 35:4, 35:5, 35:12, 57:22, 57:23, 87:18, 87:24, 88:2, 88:14, 88:17, 89:1 newly 90:10, 90:11 next 10:23, 45:9, 45:10, 101:6 nicknames 8:8 night 41:7, 41:11,	52:9, 66:15, 78:1, 103:9 none 42:9, 69:5 nonpaying 32:14, 32:16, 32:17 north 64:4, 137:1, 137:4, 137:16, 137:21 notarial 137:15 notary 137:3, 137:20, 137:22 nothing 7:9, 34:7, 63:10, 83:11 notice 5:14, 15:13, 16:3, 34:12, 80:12 notices 34:13, 34:14, 34:15 notification 32:21 notify 34:4 number 5:12, 6:2, 19:22, 30:22, 30:23, 30:24, 36:14, 37:1, 37:4, 37:6, 37:8, 37:25, 38:2, 38:3, 38:6, 51:23, 63:6, 81:17, 86:22, 96:20 number's 37:24 numbers 35:25, 36:2, 36:6, 36:7, 36:8, 36:9, 36:10, 36:12,
N			
naacp 1:16, 2:6, 5:17, 5:21, 12:5, 12:14, 12:16, 13:5, 13:8, 14:23, 18:14, 18:16, 23:5, 23:16, 24:5, 25:3, 25:15, 28:12, 28:16, 37:10,			

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

157

36:13, 36:18, 38:6, 38:11, 63:12, 93:2 ny 2:13	115:2, 115:9, 115:14, 116:15, 119:19, 120:14, 120:24, 121:23, 122:13, 124:10, 125:7, 125:9, 125:13, 127:25, 129:19	ol 99:21, 99:22 old 23:7 oldest 68:25 once 29:5, 51:5, 51:6, 70:16, 100:19, 100:20, 116:21, 127:6, 130:24 one 9:11, 10:8, 11:5, 23:4, 24:19, 30:25, 31:2, 33:20, 33:22, 35:6, 41:10, 44:18, 45:3, 45:6, 51:13, 52:1, 53:9, 53:14, 54:24, 55:1, 56:18, 62:12, 63:17, 63:21, 66:3, 67:8, 67:9, 67:11, 67:24, 69:15, 71:18, 76:8, 77:5, 81:6, 82:12, 83:20, 84:1, 84:3, 84:15, 88:13, 90:9, 92:20, 94:8, 102:1, 111:20, 111:21, 112:1, 117:5, 117:8, 122:8, 122:9, 122:10, 123:15, 128:15, 129:10 one's 77:20 one-sided 52:19 one-third 58:19, 58:20, 58:24, 59:5,	59:8, 59:15 only 4:11, 23:4, 34:2, 34:3, 37:4, 66:13, 99:6, 101:5, 117:4 open 21:21, 134:10, 135:15 opportunity 45:21, 118:14 opposed 32:6, 133:15 options 55:25, 57:5, 58:8, 59:11, 115:24, 116:2 order 79:18 orders 136:1 organization 22:18, 61:25, 69:1, 94:15, 97:1, 97:20, 109:6 organizational 5:29, 18:15, 49:19, 60:22 orleans 33:11, 87:18, 87:24, 87:25, 88:3, 88:9, 88:14, 88:17, 89:1, 89:11, 93:7, 93:9, 104:16, 133:11 other 8:7, 10:3, 13:24, 17:12, 18:3, 23:18, 23:21, 23:23, 27:15, 27:16, 36:25, 41:6, 51:16, 56:4, 78:13, 85:21, 87:18, 91:6,
o o'connor 4:11 oath 11:21, 127:16 object 82:20 objection 19:4, 27:9, 28:7, 41:20, 42:6, 43:9, 44:5, 44:16, 46:17, 48:24, 51:10, 55:13, 56:10, 56:23, 57:8, 57:20, 58:22, 59:6, 62:19, 63:1, 63:18, 63:25, 64:21, 66:7, 67:4, 68:2, 68:17, 69:4, 70:10, 71:6, 72:6, 72:8, 74:19, 75:3, 75:22, 76:16, 79:7, 79:11, 80:18, 82:4, 82:16, 84:6, 86:3, 86:15, 86:20, 87:21, 88:18, 89:17, 89:20, 92:9, 92:24, 93:18, 93:25, 94:12, 97:22, 103:16, 104:11, 105:9, 106:6, 107:19, 108:12, 108:17, 108:25, 111:8, 111:18, 111:24, 113:21, 114:3,	objections 5:24, 60:20, 95:11 objective 108:11 obligations 97:13 oblige 11:16 observing 4:11 office 4:6, 12:17, 20:10, 20:11, 20:20, 20:22, 20:24, 21:2, 30:8, 31:24, 32:1, 32:2, 32:8, 35:9, 37:16, 38:14, 41:3, 101:3, 101:4 officers 23:11, 23:12, 23:19, 23:21, 23:23, 53:6 official 1:9, 7:18, 8:12 officially 8:10, 34:7 officials 97:4 often 32:8 oh 3:16, 41:7, 60:1, 86:17, 90:2, 96:3, 103:15, 103:18, 122:18, 134:15		

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

158

97:5, 97:6, 97:9, 102:20, 104:19, 116:12, 121:6, 122:10, 124:3, 132:11, 135:25 others 9:19, 58:4, 62:13, 81:7, 90:14, 123:3, 133:8, 133:14, 133:15 otherwise 137:13 out 9:23, 14:13, 20:13, 20:15, 34:17, 45:23, 48:16, 61:22, 62:9, 62:10, 81:5, 83:10, 87:12, 90:7, 96:17, 99:21, 99:22, 101:15, 115:7, 117:17, 123:25 outlines 123:25 outside 34:6, 66:16, 85:22, 106:23, 119:20, 120:14 over 10:4, 12:8, 16:22, 16:24, 53:3, 58:16, 64:6, 64:23, 72:18, 74:14, 86:6, 112:24, 123:15, 135:5 overall 59:16 overseeing 33:1 own 56:18, 78:18, 89:4, 120:10 <hr/> P <hr/> page 5:3, 5:12,	5:16, 6:2, 16:15, 25:14, 25:23, 26:3, 39:11, 40:2, 47:22, 47:25, 48:2, 49:19, 61:1, 61:11, 61:12, 62:3, 95:8, 95:19, 95:25, 96:3, 96:12, 96:14, 113:6 pages 1:24 paid 13:17, 21:6, 21:11, 29:9, 29:10, 31:23, 32:3, 68:19, 68:23, 68:24 paper 106:14 parades 65:16 paragon 22:8 paragraph 48:16, 62:4, 62:5, 62:6, 73:25, 81:3, 90:2, 90:7, 96:14, 97:18, 113:7 parish 64:5, 72:13, 93:9, 93:10, 126:15, 127:5 parishes 24:16, 24:19, 42:24, 64:24, 68:8, 68:9, 68:10, 71:14, 71:15, 123:24, 123:25, 124:1, 126:7 part 34:25, 43:7, 51:6, 54:10,	61:20, 64:5, 69:19, 69:21, 75:15, 78:16, 78:21, 87:12, 97:18, 102:1, 120:17 participate 45:5, 99:18 participating 102:9 particular 24:8, 24:9, 29:21, 33:6, 33:13, 42:1, 55:4, 56:9, 56:12, 56:14, 59:12, 65:11, 67:8, 67:10, 68:14, 71:4, 74:16, 76:13, 91:5, 93:5, 99:2, 103:6, 103:11, 117:3, 128:13, 128:14, 129:9, 129:14 parties 41:22 parts 56:21, 57:4, 87:18 party 41:4, 41:23, 114:21, 137:13 pass 34:11, 45:8, 118:7 passed 17:16, 34:10, 64:2, 98:12, 107:6, 107:18, 108:16, 116:25, 117:7, 118:12 passes 33:24 past 118:17, 133:19 pay 12:9, 12:16,	12:22, 20:5, 20:6, 20:14, 28:14, 31:14, 31:19, 32:18, 32:19, 33:2 pays 33:1 pending 7:20, 134:10, 135:15 people 26:19, 27:22, 40:11, 40:22, 45:18, 45:19, 46:14, 53:3, 54:21, 55:19, 56:4, 57:3, 57:6, 99:1, 99:7, 100:15, 100:24, 102:8, 104:6, 104:17, 106:16, 107:3, 110:6, 115:24, 117:3, 131:11 perfect 26:7, 61:18 period 12:16, 106:16 periodic 35:17, 35:22 periodically 32:12 permanent 33:7 permissible 107:15 permission 27:18, 51:8 person 24:7, 33:4, 69:21, 117:8, 118:8, 124:25 personal 8:14, 8:16, 8:17, 8:23, 26:25, 78:18, 78:22, 82:12, 92:2, 92:3,
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

159

107:22, 108:1, 108:5, 115:6, 115:17, 133:8, 133:25 personally 36:22, 84:21, 93:23, 103:2, 108:19, 129:17, 130:2, 133:24 personally-ident- ifiable 80:7, 114:4 persons 27:4, 30:14, 34:11, 37:1, 38:21, 54:22, 56:3, 56:18, 56:21, 57:19, 91:22, 106:19, 116:24, 117:2, 118:10, 126:10 pertains 53:11, 58:25 phone 43:19 phrase 46:22, 55:18 physical 20:22 pick 116:24 picked 110:24 pickups 120:17 pictures 25:24 place 24:8, 68:21, 105:25 places 65:15, 66:17, 70:2, 71:17, 74:14, 128:11 plaintiff 5:21, 59:20, 60:18, 62:12, 67:24, 81:6,	83:19, 90:9, 96:19, 96:21, 97:10 plaintiffs 1:6, 5:29, 9:8, 48:12, 48:21, 60:23, 97:6, 97:9, 97:12 plan 98:1 planned 103:25, 104:2 plans 90:13 plant 34:19 please 7:3, 8:4, 10:15, 10:20, 11:5, 11:14, 15:14, 24:13, 25:5, 39:4, 48:5, 48:16, 57:14, 59:22, 60:8, 61:1, 61:14, 62:4, 62:11, 72:9, 73:22, 81:4, 90:7, 94:23, 95:8, 95:19, 95:24, 96:8, 96:11, 96:17, 120:20, 135:23, 136:4, 136:10 pleasure 51:15 plenty 42:23, 42:24 plethora 51:13 plight 110:3 point 35:15, 80:5, 114:5, 123:1 police 9:22, 65:3, 83:9, 110:15	policy 108:11 political 14:5, 14:8, 119:9, 119:11, 119:14 poor 55:6 population 58:4, 59:1, 59:16, 98:8 position 13:15, 13:17, 21:6, 24:10, 28:3, 101:4, 107:24, 111:15 positions 12:25, 14:17, 118:15 possible 72:25, 112:22 possibly 98:16 post 27:18 posting 27:4 postpone 104:4 postponed 103:13 pot 57:23, 57:24, 58:20, 58:21 potholes 110:23 power 99:22, 99:23 practice 134:10, 135:16 pray 85:6, 99:25, 100:1 prayer 21:17, 47:25, 113:6 praying 45:25	pre-trial 97:12 prefer 39:16 preparation 39:24 prepare 16:20, 122:3, 122:6, 123:6 prepared 17:2 preparing 36:16, 75:11, 77:3, 121:19, 123:19, 124:6, 125:2, 125:19, 126:19, 126:24, 127:22, 128:19, 129:15, 130:21, 130:25, 131:16 present 4:3, 51:19, 51:23, 54:4, 54:18, 54:20, 135:25 president 13:6, 13:12, 14:18, 14:21, 19:1, 23:20, 24:5, 42:3, 44:2, 44:14, 54:24, 55:2, 64:8, 70:7, 71:21, 72:11, 72:12, 76:19, 80:8, 84:9, 84:14, 85:4, 85:5, 86:14, 87:25, 88:8, 88:17, 96:23, 108:1, 109:14, 110:10, 110:23, 112:23, 113:23, 115:19, 119:20, 119:24, 120:20, 121:24, 133:11, 134:13, 134:18 presidents 15:9, 15:10,
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

160

23:12, 23:25, 26:10, 26:20, 42:4, 42:15, 43:7, 50:23, 51:8, 51:19, 53:5, 54:3, 70:2, 70:3, 71:22, 92:7 pretty 18:6, 34:12, 88:3 prevent 11:25 previous 90:20 previously 35:11, 58:18, 109:5 primary 14:14 printing 26:18 printout 5:15, 25:14 private 115:18 privilege 27:24, 28:6, 42:8, 66:9, 73:13, 76:18, 122:14, 129:25 privileged 43:11, 84:7, 124:10, 124:13, 129:20 privileges 80:15, 82:21 probably 10:4, 10:5, 13:13, 14:16, 26:12, 32:5, 33:3, 34:18, 37:23, 38:7, 42:19, 44:22, 51:5, 52:4, 66:12, 75:8, 77:19, 77:20, 77:21, 77:23,	78:15, 84:24, 85:17, 85:18, 85:19, 85:20, 88:1, 93:3, 98:20, 105:11, 109:24, 114:11, 126:8, 127:16, 127:17 problem 11:18 proceeding 137:13 proceedings 49:14, 73:18, 119:4 process 10:12, 40:15, 44:25, 45:1, 45:4, 51:14, 52:5, 52:7, 54:6, 56:6, 59:10, 99:18, 99:19, 99:20, 100:5, 102:9, 102:10, 116:23 produce 94:11 produced 17:20, 17:22 production 5:27, 60:22 professional 10:5 promote 14:22 proper 109:17, 110:17 proportion 59:16 proposes 118:7 protected 28:4, 42:7, 66:8, 129:25 protest 83:9 prouty 3:12, 5:7,	121:8, 121:9, 121:12, 121:21, 122:16, 122:20, 125:14, 125:17, 125:18, 129:23, 130:1, 134:3, 136:6, 136:10 provide 36:22 public 21:22, 27:12, 137:4, 137:20 publicly 24:25 publicly-available le 27:5 pull 15:12, 25:2, 39:1, 50:14, 59:19, 59:22, 93:5, 94:20, 121:22 pumping 100:18 purpose 18:18, 74:18, 75:20 purposes 86:1 put 74:12 <hr/> Q <hr/> qualifications 28:11 quarterly 32:11, 44:8, 44:22, 44:23, 52:10, 52:25, 53:22, 70:13, 76:2, 76:22, 76:23, 92:12, 131:3 quasi 68:20 question 10:21, 10:23,	11:15, 13:20, 37:12, 44:1, 55:6, 56:25, 57:1, 57:18, 62:22, 69:9, 72:22, 75:18, 87:8, 88:15, 92:21, 93:7, 96:3, 109:3, 111:14, 122:19, 129:24 questioned 66:4, 70:4, 70:20, 133:3 questioning 49:9, 130:5 questions 7:25, 10:16, 11:3, 11:5, 11:25, 15:24, 30:21, 79:20, 80:2, 80:11, 90:19, 97:17, 107:24, 118:19, 121:4, 121:7, 121:15, 133:16, 134:4, 134:13, 135:12 quick 72:24 quite 18:6, 35:14, 51:22, 121:1 quo 109:18 <hr/> R <hr/> race 28:22, 56:9, 58:6, 116:4 races 56:4 racism 110:1 racist 109:20 radio 98:24
-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

161

raise 7:3, 25:17, 43:19, 111:12, 111:13 raleigh 2:21 rallied 72:21 rallies 43:19, 65:14 rally 104:3 rarely 128:10 read 16:25, 48:14, 48:16, 57:14, 57:15, 61:14, 61:17, 61:22, 62:4, 62:9, 62:10, 81:4, 90:7, 96:17, 136:2 ready 11:10, 36:3, 98:25, 101:1, 101:2 real 11:21, 110:1 realized 40:19, 129:12 really 23:1, 30:3, 32:22, 79:21, 89:12, 99:16, 107:20, 108:19, 131:13, 134:5 reason 25:15 recall 9:10, 10:6, 10:8, 17:14, 30:17, 30:25, 54:23, 55:5, 61:3, 95:20, 122:24, 127:9, 130:9 receive 21:17, 36:24,	64:12, 64:14, 64:15, 64:16, 64:17 recently 9:7, 20:25, 30:12 recess 49:14, 73:18, 119:4 recognize 15:25, 25:11, 26:19, 39:8, 60:12 recollection 50:22 record 8:5, 10:14, 10:19, 31:17, 46:25, 48:17, 49:15, 57:15, 61:23, 62:11, 80:11, 80:14, 81:5, 90:8, 96:18, 119:6, 125:8, 127:11 recorded 34:1, 34:2, 34:7 records 106:12 rector 2:11 red 40:3 redirect 99:8 redistricting 40:15, 40:16, 45:4, 45:24, 51:14, 52:7, 53:10, 59:9 redondo 8:18 refer 103:19 referring 13:9, 17:5, 17:20, 55:18,	55:22, 56:20, 57:3, 57:7, 102:3 refers 78:5 reflected 135:8 reflects 86:25 regarding 16:17, 73:25, 78:17, 134:10 regards 107:24 regina 114:18 register 22:2 registered 8:22, 20:4, 29:2, 38:23, 78:9, 89:6, 93:12, 111:23, 131:23, 133:17 registration 65:5, 137:22 regular 35:7 regularly 34:13, 88:23, 105:15 reid 1:25, 137:3, 137:20 related 137:12 relevant 97:5, 107:20 relief 5:20, 39:21, 45:13, 45:18, 47:25, 55:8, 59:4, 113:6 rely 70:25 relying 38:10 remain 29:6	remember 31:4, 50:15, 55:1, 65:24, 65:25, 87:9, 125:12, 134:21 remind 10:11 remote 4:19, 59:24, 60:4 remotely 2:2 removed 34:22, 35:12, 36:7 removing 34:25 renting 103:7 repair 14:6, 84:25, 123:6 repeat 31:11, 37:11, 56:25, 57:1, 62:22, 69:9, 109:2, 126:23 rephrase 11:6, 31:13 report 15:3, 15:5, 15:9, 19:14, 20:5, 21:2, 64:14 reported 1:25 reporter 7:2, 7:11, 10:14, 10:20, 57:13, 135:21, 135:24, 136:5, 136:9, 136:11, 137:3 reports 15:7, 20:18, 32:3, 32:9, 64:12, 64:17 represen 116:18
---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

162

represent 7:17, 25:13, 40:11, 40:18, 72:12, 87:15 representation 56:5, 56:15, 56:16, 109:18, 110:18, 110:22, 111:1, 116:19 representations 38:10 representative 1:17, 68:6, 98:15, 98:20, 102:7, 102:12, 107:23, 114:17, 116:24, 117:14, 118:1, 119:15, 119:22 representatives 45:23, 46:4, 47:17, 97:8, 98:11, 116:13, 132:8 represented 119:17, 119:25 reputation 100:17 request 48:12, 91:24, 91:25 requests 5:27, 60:21 requirement 29:4 requirements 20:9 reserved 136:15 reside 66:3, 66:22, 71:3, 90:10 resident 33:7 resides 62:13, 67:25, 79:2, 79:10 residing 64:9, 75:1	resources 98:18, 99:8, 102:15, 102:18, 102:19, 102:20, 102:25, 103:10 respect 76:17 respectfully 48:12 response 10:16, 62:3, 62:5, 62:7, 62:18, 63:7, 63:13, 67:23, 78:16, 81:3, 81:18, 81:22, 85:23, 86:7, 92:1, 94:6, 123:19, 124:7, 125:2, 125:20, 127:23, 128:20, 130:21, 131:16, 132:12, 132:17, 132:25 responses 5:23, 6:3, 10:14, 16:24, 17:5, 17:6, 17:7, 17:11, 59:21, 60:19, 61:6, 94:21, 95:10, 95:21, 121:19, 121:20, 122:4, 122:7, 123:6, 126:24, 129:16 responsible 35:16 responsiveness 97:3 restate 135:14 result 45:7, 97:20, 102:16, 103:13, 105:7, 108:23, 109:8, 110:17, 111:17	revealing 124:13 review 17:12, 39:23, 74:6, 76:14, 81:24, 91:6, 95:2, 96:7, 121:18, 123:18, 127:21 reviewed 18:13 reviewing 74:11 rice 58:16, 67:17 rich 43:15, 58:5 riggins 2:17 right 7:4, 8:10, 9:15, 11:9, 11:11, 13:19, 18:1, 18:8, 21:7, 22:17, 24:21, 25:22, 25:23, 26:6, 26:22, 31:14, 31:15, 31:18, 31:21, 33:23, 43:2, 45:8, 46:1, 46:2, 46:13, 48:7, 48:15, 50:19, 50:20, 54:23, 58:1, 61:21, 63:14, 66:16, 68:6, 71:15, 73:16, 81:2, 81:23, 89:19, 89:25, 90:6, 92:15, 94:17, 95:16, 95:17, 95:23, 99:3, 100:18, 100:20, 102:7, 105:14, 105:18, 107:4, 112:4, 113:12,	114:13, 119:5, 120:8, 120:9, 120:11, 122:7, 122:11, 123:3, 124:4, 124:25, 127:24, 129:1, 129:6, 132:18, 134:8, 135:13 rights 48:19, 112:19, 113:10, 136:15 riley 2:18 road 98:4, 98:5, 102:14 roads 83:2 rob 4:8 role 14:8, 22:24, 127:22, 128:3 roles 127:14 roll 37:2 room 8:2, 9:1, 22:15, 29:25 rooms 89:3, 103:8 roster 128:3 rouge 3:8, 8:18, 8:20, 9:9, 9:14, 9:15, 9:18, 12:20, 12:22, 13:1, 14:4, 33:10, 42:21, 83:23, 84:5, 84:12, 84:14, 84:17, 84:20, 85:13, 85:20, 85:22, 93:8, 93:9, 117:18, 133:12
----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

163

rough 110:1 rpr 137:20 rules 10:11 run 101:2 running 101:3, 115:5, 115:8, 116:8, 116:9	89:19, 115:16, 118:18, 120:16, 122:16, 123:2, 134:8 sat 17:1, 66:18, 72:15, 72:19 saturday 22:11 say 12:12, 14:14, 17:4, 17:19, 19:8, 24:2, 24:18, 29:21, 31:16, 37:11, 38:9, 38:15, 42:2, 42:13, 42:18, 44:9, 46:11, 48:3, 52:22, 52:24, 54:13, 56:1, 56:16, 65:23, 77:16, 78:19, 80:1, 81:20, 84:12, 88:10, 92:1, 93:8, 99:4, 101:8, 103:3, 107:14, 108:6, 109:2, 109:14, 117:5, 125:23, 125:24, 130:12, 130:16, 130:25, 131:18, 133:6, 133:10, 135:7 saying 44:18, 58:13, 69:23, 100:10, 100:21, 101:15, 102:6, 107:7, 110:10, 116:17 says 47:11, 47:24, 52:22, 52:24, 63:16, 67:24, 100:10, 113:9 sbl 48:18, 49:2	scarborough 2:18 scary 106:24 schedule 97:12 school 65:7, 83:10, 83:11, 110:13, 111:12, 120:3, 120:4, 120:7 schueler 4:18 scope 119:20, 120:15 scott 1:10 scratch 55:6 screen 15:22, 93:5, 112:23 screens 119:1 scroll 26:2, 26:15, 26:16, 39:13, 40:1, 48:1, 48:5, 60:8, 90:2, 95:1, 95:7, 96:1 se 29:14, 30:1, 30:24, 34:2, 37:14, 93:1, 128:3 seal 137:15 second 5:13, 15:12, 26:3, 62:6, 73:25, 81:3, 124:24 secretaries 30:13 secretary 1:10, 7:19, 23:13, 27:21,	33:5, 46:7, 53:25, 71:21, 108:15 section 48:19, 48:20, 48:23, 112:19, 113:10 sections 90:20 see 11:19, 25:9, 25:21, 26:11, 26:17, 26:22, 37:19, 39:10, 40:3, 47:24, 48:11, 61:20, 63:6, 63:8, 63:10, 66:24, 74:3, 81:17, 89:14, 95:25, 96:2, 96:13, 109:17, 113:7, 113:9, 115:10, 118:24 seeing 118:25 seek 42:7 seeking 45:14, 45:18 seeks 43:10, 55:8, 59:4, 76:17 seems 13:13 seen 46:11, 95:5 senate 47:16, 48:22, 49:2, 53:11, 55:24, 62:14, 62:17, 62:24, 63:10, 64:20, 65:10, 66:24, 67:25, 68:5, 69:12, 70:8, 71:3, 74:1, 74:3, 75:2,
S			
sabine 64:5, 93:10 safe 38:15 said 9:13, 19:5, 30:7, 31:14, 40:15, 46:14, 47:18, 50:21, 51:16, 52:20, 54:8, 57:5, 72:2, 76:10, 77:8, 77:21, 102:1, 114:12, 115:22, 122:6, 126:18, 126:25 saith 136:14 sam 100:10 same 10:22, 19:22, 49:19, 78:13, 79:14, 80:16, 80:19, 86:8, 89:21, 90:20, 109:18, 110:7, 128:5, 132:10, 132:14, 132:15, 132:23, 133:3 sara 2:9, 46:21, 79:13, 79:23, 82:18, 86:17,			

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

164

77:17, 78:12, 78:13, 78:17, 79:5, 79:15, 80:19, 80:22, 90:16, 100:23, 101:4, 107:10, 108:8, 114:7, 114:12, 114:16, 115:1, 117:5, 119:18, 132:15, 132:24, 133:21 senator 65:10, 102:12, 114:15, 114:18, 114:25, 115:13, 115:25, 119:11, 119:17 senatorial 46:3, 63:21, 64:10, 66:4, 67:10, 68:14, 70:5, 70:20, 72:21, 74:16, 77:13, 83:6, 117:8 senators 45:22, 117:6 send 32:2, 32:9, 32:10, 32:12, 34:18, 35:8, 35:22, 35:24, 35:25, 36:6, 36:25 sending 102:2, 102:5, 102:8 sent 20:18, 20:19, 123:12 separate 50:9, 50:10 september 1:20, 137:17 series 123:16 serve 23:6	service 34:20 services 34:3, 34:20 sessions 98:5 set 5:25, 5:26, 6:4, 18:20, 60:20, 60:21, 94:22, 95:11 sets 23:6 several 69:15 sharp 14:12 shelly 1:8 shift 40:17, 98:1, 98:18 shifting 98:13 shirt 109:21 short 122:3 shorten 13:7 shortened 95:14 should 26:12, 33:4, 35:21, 46:12, 56:16, 59:12, 87:1, 99:13, 108:21, 114:9 shouldn't 79:20 shouting 101:22 show 92:22, 93:1, 93:4, 112:16 shows 3:6, 98:4, 98:5 sic 17:20, 71:8	side 52:16, 110:25 sidelined 105:7 sign 136:2 signature 136:15 signature-plkal 137:18 signed 94:8, 123:11 signing 61:3 silently 62:9 since 10:13, 97:24 single 80:17 sir 7:11, 33:24, 54:15, 56:20, 64:11, 84:13, 109:9, 116:20 sit 88:2, 100:11 sitting 88:24 situated 70:4 six 13:14, 26:19, 26:23 slap 101:7 slapped 100:7 small 14:6, 38:6, 109:19 smaller 83:6 smart 123:9 social 43:20 soldier 34:21	some 9:8, 9:19, 26:20, 30:20, 32:21, 34:18, 34:19, 35:14, 40:17, 40:20, 42:17, 45:11, 66:11, 67:15, 67:16, 67:17, 70:3, 75:24, 90:19, 93:21, 98:10, 101:23, 109:19, 116:11, 120:2, 122:9, 123:1, 129:6, 130:6, 130:7, 131:9, 133:7, 133:13 somebody 33:17, 53:25, 69:17, 70:3, 76:8, 77:1, 92:20, 98:16, 100:7, 101:1, 110:3 someone 23:15, 24:4, 27:3, 28:19, 29:11, 29:20, 41:18 something 18:7, 24:14, 27:16, 49:18, 99:11, 99:13, 105:14, 108:20, 112:15, 116:11, 117:7, 130:17 sometime 65:22 sometimes 87:13, 129:11 somewhere 127:12 sooner 101:23 sorry 62:5, 78:20, 88:21
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

165

sound 10:24, 11:7, 50:19, 107:16, 114:13, 117:20, 118:21 sounds 10:25, 117:21, 118:22, 119:2 south 8:17 southern 67:16, 85:10 speak 9:22, 70:2, 74:17, 74:21, 74:24, 75:11, 85:25, 87:4, 87:5, 87:12, 87:14, 87:15, 88:16, 88:23, 92:6, 105:14, 105:15, 130:16, 130:22, 133:12, 133:14 speaking 10:23, 87:13, 88:11 specific 46:22, 50:22, 54:23, 57:4, 58:21, 75:19, 77:9, 86:13, 86:14, 87:6, 87:20, 88:20, 96:20, 102:15, 103:12, 104:10, 111:5, 112:15, 113:13, 113:16, 113:18, 116:14, 117:11, 122:24, 124:8, 124:15, 124:21, 125:3, 125:21, 126:21, 127:1, 127:9, 128:5, 128:6, 128:21, 129:17, 130:3, 130:9, 130:10, 130:13,	131:13, 131:15, 131:22, 132:1, 132:6, 133:21 specifically 44:13, 44:14, 78:12, 104:20, 105:13, 105:17, 131:21 spend 103:3, 103:4 spiritually 112:5 spoke 42:22, 44:18, 44:19, 44:20, 75:19, 75:24, 75:25, 86:5, 88:3, 88:21, 91:1, 91:9, 130:8, 131:2 spoken 42:24, 46:12, 86:10, 87:3, 88:9, 88:10, 133:7 spots 98:24 spring 50:19, 50:21, 50:24, 51:4, 51:5 st 3:7 stadiums 91:18 staff 30:13, 53:23 stand 83:9 standing 20:1, 27:23, 28:5, 29:7, 30:2, 30:4, 30:6, 30:11, 30:19, 31:1, 31:3, 31:6, 31:10, 31:20, 68:16, 68:22,	69:25 stands 58:8 started 9:24, 10:10 starting 62:7 starts 34:25, 48:11, 62:7, 96:15 states 1:1, 7:21 statewide 37:23 status 50:4, 109:18 stay 20:1, 77:4, 100:11 staying 103:9, 104:5, 110:7 stays 30:4, 67:11 stenographer 57:15, 135:19 step 52:8 sterling 9:20 still 52:18, 80:4, 99:5, 99:21, 99:22, 100:5, 101:21, 104:22, 110:23, 132:19, 133:20, 135:17 stood 83:14 stop 21:9 stopped 97:16 street 2:11, 2:19, 3:7, 129:8, 129:13, 129:14 streets 110:23	strike 117:10 strong 60:7 structure 18:16, 49:19, 134:20, 134:24, 135:2, 135:8 structured 55:24 stuart 2:10, 123:2 stuff 30:14, 40:20, 50:18, 57:25, 94:16, 103:24, 122:10 styled 7:20 subsection 62:8 sued 9:9, 9:13 suffer 111:20, 111:21, 112:1, 112:2, 112:4, 112:6 suffered 97:20, 99:6, 108:22, 109:6 suffering 112:2, 112:3, 112:7, 112:8, 112:9, 112:10 suffers 111:21 suit 9:8, 53:15, 60:7 suite 2:20, 3:15 suits 65:8 sun 109:22, 109:23 supplemental 5:23, 17:6, 59:21, 60:19,
-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

166

62:6, 121:20, 122:4, 123:6, 123:19, 124:7, 127:23, 130:21, 131:16, 132:12, 132:16, 132:25 suppression 106:22 supreme 53:15 sure 10:13, 10:15, 11:8, 18:6, 25:19, 28:1, 31:9, 31:12, 35:14, 39:12, 42:9, 42:19, 47:14, 48:2, 49:10, 49:18, 51:22, 55:16, 57:2, 57:12, 62:23, 69:5, 69:10, 71:7, 80:9, 83:25, 96:1, 102:22, 102:24, 104:6, 107:13, 109:4, 112:11, 112:17, 112:25, 115:12, 117:16, 121:1, 129:5 sworn 7:7, 61:7, 94:3, 137:7 system 106:15, 110:13 systems 65:7, 105:20, 106:4, 107:25 <hr/> T <hr/> tables 72:16 tabulates 106:12 take 18:11, 28:17, 40:22, 40:23,	41:8, 49:8, 49:11, 53:21, 98:18, 103:22, 105:25, 128:16 taken 54:14 takes 136:12 taking 7:16, 118:20 talk 9:20, 34:18, 41:8, 42:15, 43:16, 44:25, 51:4, 51:12, 52:5, 53:7, 53:13, 53:14, 53:16, 65:10, 70:14, 89:11, 92:14, 92:15, 92:16, 93:7, 93:8, 100:3, 100:14, 102:18, 103:6, 103:8, 103:9, 105:11, 105:12, 109:12, 110:12, 110:15, 110:19, 111:2, 112:15, 118:4, 118:5, 129:17, 130:2, 131:5 talked 16:23, 42:17, 44:8, 45:6, 51:24, 52:25, 70:17, 72:20, 74:11, 83:18, 92:5, 93:2, 93:6, 115:23, 116:2, 122:22, 130:4, 130:5 talking 51:2, 52:6, 52:12, 54:20, 73:25, 77:1, 78:23, 89:12, 92:17, 93:21, 94:7, 99:2,	104:5, 116:3, 130:20 talks 105:24 team 76:9, 76:12, 122:22 tech 15:11, 59:22 technically 30:3 technician 4:19, 59:24, 60:4 tell 36:21, 46:1, 64:16, 69:20, 71:1, 86:9, 99:14, 100:6, 100:15, 100:24, 101:6, 107:11, 109:12, 111:10, 114:10, 114:11, 114:15, 117:15, 126:14, 126:15, 131:8 telling 66:14, 106:22 tells 38:12, 38:14 ten 12:8, 88:1, 135:6 term 23:4, 28:15, 37:16, 46:24, 47:1, 98:2 terms 19:11, 36:20, 37:3, 50:17, 76:1, 76:2, 76:7 terrain 71:25 test 11:13, 83:12, 126:16 testified 7:10, 9:2, 9:6,	9:8, 10:1, 10:3, 64:11, 70:24, 120:16 testify 7:8, 16:6, 16:17, 97:7 testifying 11:20, 11:22 testimony 38:17, 57:10, 94:3, 96:24, 121:17, 121:24, 137:10 th 137:16 thank 7:11, 11:17, 15:17, 18:12, 22:16, 28:18, 57:14, 57:16, 60:6, 60:24, 62:1, 62:16, 73:23, 81:12, 90:18, 97:14, 101:25, 108:7, 113:3, 119:3, 122:21, 134:3, 134:7, 135:11, 135:24, 136:5, 136:11 thanks 18:8 that'd 40:6 themselves 87:13, 93:3 thereof 137:14 thereupon 7:5, 137:7 thing 37:4, 45:6, 45:8, 46:2, 46:13, 103:22 things 11:12, 32:23, 35:19, 47:12, 53:17, 99:15,
-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

167

<p>99:23, 101:9, 103:8, 104:1, 104:8, 105:16, 109:25, 110:7, 118:5, 122:9, 122:10 think 18:5, 24:13, 34:6, 44:19, 47:13, 50:20, 53:2, 57:23, 58:24, 73:11, 100:10, 101:24, 112:2, 112:7, 112:9, 116:7, 116:8, 116:9, 123:1, 131:13, 136:11 third 47:9, 47:10, 47:12, 47:13, 47:15, 47:20, 59:1 thomas-lundborg 4:13, 22:14 thought 98:19 thousands 37:24, 38:4, 38:7, 38:9, 38:15, 38:22, 54:21 three 14:13, 78:2, 93:22 three-day 22:10 through 1:17, 10:12, 14:23, 35:20, 39:14, 43:20, 47:14, 54:5, 60:9, 79:2, 85:2, 86:6, 87:4, 87:5, 98:4, 106:14, 107:5, 107:8, 116:22, 116:23,</p>	<p>117:4, 118:10, 131:3 throughout 15:2, 41:9, 44:25, 45:2, 47:16, 53:8, 56:6, 56:7, 59:8, 59:9, 100:25 thursday 22:10 tigers 85:12 time 22:4, 22:9, 33:21, 43:17, 50:17, 73:6, 73:9, 88:20, 98:3, 99:3, 100:1, 101:6, 105:12, 116:8, 116:9, 118:19, 118:25, 121:5, 123:2, 123:8, 123:11, 123:15, 125:1, 127:18, 134:6, 134:9, 135:14, 136:1 times 51:1, 51:3, 84:23, 87:10 tiptoe 103:23, 103:25 title 13:3, 26:17, 60:24, 95:14 today 7:16, 7:24, 9:24, 10:7, 10:10, 10:16, 11:20, 12:1, 16:6, 16:17, 17:2, 39:24, 88:25, 94:4, 110:25, 114:10, 121:15, 121:18, 125:8, 125:12, 134:5</p>	<p>together 72:21, 74:13, 91:10, 101:18, 105:17 told 56:13, 74:14, 99:14, 110:10 tone 23:6 took 74:11 top 25:17, 47:25, 60:16, 61:12, 63:3, 81:15, 83:24, 114:10 topic 80:12 topics 16:18, 97:5 tori 2:8 totally 63:5, 73:15 tough 99:17, 100:6, 100:8, 100:9 tougher 99:12, 100:13 toward 77:3 town 101:22, 104:3, 104:9, 104:10, 104:13, 104:15, 110:25, 127:5 towns 72:15, 76:25, 109:20 track 30:8, 31:22 trainings 22:12, 99:1 transcript 15:16, 25:7, 39:6, 60:3, 94:25, 135:18, 136:3, 137:9</p>	<p>transform 104:18 transitioned 34:5, 34:21 trash 110:24, 120:12, 120:17, 120:22 travel 83:2 treasurer 23:13, 71:22 trigger 36:14 true 137:9 trust 23:2 truth 7:8, 7:9 try 10:15, 10:22, 11:2, 34:17, 66:23, 101:18 trying 31:5, 100:4, 100:6, 101:10 turn 16:14, 47:22, 60:25, 61:10, 95:18, 95:24, 96:11 tv 118:25 two 9:12, 33:3, 33:4, 35:6, 38:14, 71:19, 78:2, 84:4, 84:16, 93:22 type 21:16, 32:21, 34:19, 45:11, 50:18, 103:7, 104:7</p> <hr/> <p style="text-align: center;">U</p> <hr/> <p>uh-huh 18:1</p>
------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

168

<p>ultimately 53:19 uncle 102:10 under 11:21, 26:23, 62:6, 101:12, 112:18, 113:16, 130:5, 137:15 understand 11:5, 11:20, 16:5, 16:9, 27:25, 53:18, 55:10, 61:6, 66:21, 80:9, 95:9, 109:19, 110:2, 112:18, 121:17, 122:5, 125:6 understanding 16:16, 28:2, 38:16, 48:21, 101:13, 134:23, 135:1, 135:2 understands 110:3 understood 134:12 unit 19:12 united 1:1, 7:20 units 12:19, 19:6, 19:14, 19:22, 20:1 university 85:10 unless 30:4 unpacked 90:12 until 10:20, 68:21 updated 92:14 updates 35:18, 35:23,</p>	<p>52:16 upstream 110:11 usc 48:20 use 19:10</p> <hr/> <p>v</p> <hr/> <p>vague 56:23, 115:9 vans 103:7 various 15:10, 41:9, 43:20, 43:23, 56:21, 65:14, 65:16, 65:20, 69:16, 71:22, 86:6, 86:9, 86:24, 87:2, 87:11 vast 94:14 verbal 10:16 verification 61:4 verify 37:6, 37:7, 69:2, 69:11, 74:7, 81:25, 84:3 verifying 86:1, 95:21 via 41:23, 52:8, 53:1 vice 15:8, 23:12, 23:25, 24:5, 26:10, 26:20, 44:1, 70:2, 71:21, 71:22, 72:11, 72:12, 84:14 victoria 2:8, 123:2</p>	<p>victory 52:19 videotaped 136:16 view 61:12 violation 48:19, 48:23, 113:10 virtual 8:1, 9:1, 22:15, 29:24 virtually 1:19, 2:2 visit 85:16 visited 75:8, 75:9 voices 86:11 vote 8:22, 38:23, 70:18, 78:9, 93:12, 106:19, 106:23, 107:3, 115:13, 116:24, 131:24, 132:3, 133:18, 133:24 voted 106:10, 115:20, 132:7, 133:19 voter 29:2, 65:5, 106:22, 112:4, 112:7 voters 89:7, 97:8, 111:23 votes 106:12 voting 48:19, 105:20, 105:24, 106:4, 106:24, 107:2, 107:7, 107:16, 107:25, 108:9, 108:10, 112:19, 113:10, 134:1</p>	<p>vp 23:20, 24:18 vps 24:12, 24:15</p> <hr/> <p>w</p> <hr/> <p>wait 10:20, 106:23 waived 27:23 wall 46:12 walsh 3:4, 3:6 want 9:21, 24:2, 27:13, 42:9, 47:10, 47:14, 48:22, 68:1, 68:23, 69:5, 71:7, 73:7, 79:17, 80:13, 87:12, 97:15, 105:3, 107:1, 107:2, 117:7, 118:23, 121:22, 122:2, 135:22 wanted 26:16, 27:14, 46:24, 49:17 wanting 57:6, 99:17 watch 67:15, 83:7, 100:25 way 20:16, 21:16, 21:18, 24:13, 47:12, 52:5, 52:8, 55:23, 66:23, 99:11, 105:24, 109:24, 115:10 wayne 8:6 ways 35:6 we'll 45:11, 47:15,</p>
-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

169

73:17 we're 22:3, 22:9, 28:23, 36:3, 37:16, 38:15, 45:1, 45:18, 47:11, 49:8, 49:18, 53:8, 53:16, 56:13, 59:24, 61:12, 73:4, 85:13, 86:12, 92:18, 98:9, 100:4, 100:19, 100:20, 103:3, 103:4, 103:5, 104:5, 104:13, 106:13, 110:24, 113:5, 122:1, 131:7, 131:8, 134:9, 135:14, 135:15 we've 49:12, 64:1, 65:3, 65:5, 65:14, 72:20, 83:19, 85:2, 97:24, 102:25, 103:1, 104:15, 104:20 website 5:17, 22:2, 24:23, 24:25, 25:3, 25:15, 27:6, 27:12, 27:14, 27:19, 27:23 weeks 105:2 welcome 22:11, 85:6 welcoming 67:14 wenger 2:8 went 9:20, 16:24 weren't 30:18	whatever 40:21, 47:10, 47:20 whenever 49:8 wherefore 48:12 whether 20:8, 30:6, 31:23, 43:7, 44:3, 44:14, 44:18, 57:9, 74:25, 112:3, 133:16 whichever 48:6 white 78:3, 78:7 whole 7:8, 44:25, 47:19, 53:8, 56:6, 56:7, 57:25, 68:5, 83:2, 87:15, 101:11 wholeheartedly 44:9 william 17:25 win 44:10 wins 99:21, 99:22 wish 116:25 within 33:17, 89:1, 128:23 without 109:17, 124:13 witness 72:7, 84:11, 92:11, 93:20, 134:7 witnesses 96:20, 96:21, 97:9 wondering 109:6, 113:13,	113:17 work 13:24, 14:24, 33:14, 51:17, 98:14, 99:9, 100:5, 119:9, 119:11, 119:14 worked 108:16, 108:20, 108:21 works 33:17, 51:18 worse 112:9 wouldn't 30:22, 32:22, 36:1, 89:13, 91:23, 94:15 write 123:9 writing 46:11 <hr/> Y <hr/> y'all 100:16 yeah 11:18, 17:15, 18:1, 18:5, 43:5, 48:4, 50:21, 57:2, 61:13, 82:8, 89:15, 118:22, 119:2, 122:20, 126:4, 129:1, 130:17, 130:19 year 9:11, 20:25, 21:24, 44:24, 51:1, 51:3, 51:6, 104:23 year's 30:17 year-old 30:20 years 12:8, 13:14, 88:2, 135:6	york 2:13, 57:23 young 101:14 yourself 7:24, 48:9, 61:15 youth 15:1 <hr/> Z <hr/> zone 100:11 zoom 41:23, 41:24, 53:1, 53:2, 53:7, 54:7, 54:12, 54:18, 68:24, 129:11, 129:12 zoomed 129:12 zwolle 64:6 <hr/> \$ <hr/> \$30 68:23, 68:25 <hr/> 0 <hr/> 00178 1:5 04 1:21 05 119:1 <hr/> 1 <hr/> 1 118:24, 119:1, 136:16 10 1:21, 62:15, 63:22, 73:9, 81:17 10006 2:13 101 81:11, 90:15
--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------

Transcript of Michael McClanahan, Designated Representative

Conducted on September 8, 2023

170

10301 48:20 11 73:7, 73:17 12 137:16 1200 3:15 121 5:7 13 81:9 134 5:9 137 1:24 14 48:18, 49:3, 62:15, 63:22, 72:17 1400 2:20 1461 3:9 1473 8:17 15 5:13, 62:15, 63:22, 72:17, 80:19, 80:22, 90:16, 114:12 17 62:15, 63:22, 90:16 19 62:15, 63:22, 90:17 <hr/> 2 <hr/> 200 3:14 20012210079 137:22 2021 40:15, 51:2 2022 50:19, 50:21, 50:24	2023 1:20, 90:13, 137:17 2025 137:5 22 1:5, 81:9 225 3:9 23 107:10, 108:9 25 5:15, 81:9, 136:16 27 81:9 27603 2:21 29 90:14 <hr/> 3 <hr/> 3 122:7, 127:23 3(a) 74:4 30 1:15, 5:13, 15:13, 16:10, 80:3, 80:12 301 2:19 31 62:15, 63:22 34 81:9, 90:15 346 3:9 35 81:9 36 62:15, 63:22, 81:9 37 81:9 38 62:15, 63:23, 72:18, 90:15,	90:17 3800 2:22 39 5:18, 62:15, 63:12, 63:23, 72:18, 90:17, 117:6 3:-cv--sdd-sdj 1:5 <hr/> 4 <hr/> 4/4/22 40:6 40 2:11, 19:20 43215 3:16 462 3:17 47 81:9 4710 3:17 <hr/> 5 <hr/> 50 20:4, 20:12, 36:13, 36:18, 36:22, 36:23, 38:13 501 50:1, 50:4, 50:10 506194 1:23 52 48:20 55 73:7, 73:9, 73:17 57 81:10, 90:15 58 30:20, 47:22, 48:2, 81:10, 90:15, 113:6 59 81:10	<hr/> 6 <hr/> 60 5:21, 81:10, 90:15 61 81:10, 90:15 614 3:17 62 81:10 628 3:7 63 81:10, 90:15, 117:13, 117:15 65 81:10, 90:15 66 81:10 67 81:10 68 81:10, 90:15 69 81:10, 90:15 <hr/> 7 <hr/> 70 81:11 70802 3:8 70814 8:20 70815 8:18 7600 8:19, 21:1 <hr/> 8 <hr/> 80 81:11 877 2:22 88 81:11 <hr/> 9 <hr/> 919 2:22
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