

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

4 ALPHA PHI ALPHA FRATERNITY,) DAY 8 - P.M. SESSION
 INC., ET AL.,)
 5 PLAINTIFFS,)
 6 -VS-) DOCKET NO. 1:21-CV-05337-SCJ
 7 BRAD RAFFENSPERGER,)
 8 DEFENDANT.)

9 COAKLEY PENDERGRASS,)
 ET AL.,)
 10 PLAINTIFFS,) DOCKET NO. 1:21-CV-5339-SCJ
 11 -VS-)
 12 BRAD RAFFENSPERGER, ET AL.,)
 13 DEFENDANTS.)

14 ANNIE LOIS GRANT, ET AL.,)
 15 PLAINTIFFS,) DOCKET NO. 1:22-CV-00122-SCJ
 16 -VS-)
 17 BRAD RAFFENSPERGER, ET AL.,)
 18 DEFENDANTS.)

19
20 TRANSCRIPT OF BENCH TRIAL
21 BEFORE THE HONORABLE STEVE C. JONES
22 UNITED STATES DISTRICT JUDGE
23 THURSDAY, SEPTEMBER 14, 2023

24 **STENOGRAPHICALLY RECORDED BY:**

25 PENNY PRITTY COUDRIET, RPR, RMR, CRR
OFFICIAL COURT REPORTER
UNITED STATES DISTRICT COURT
ATLANTA, GEORGIA

1 APPEARANCES:

2 ON BEHALF OF THE PLAINTIFFS:

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4 ALEX W. MILLER, ESQ.
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11 ABHA KHANNA, ESQ.
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13 ON BEHALF OF THE DEFENDANT:

14 BRYAN P. TYSON, ESQ.
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1 (PROCEEDINGS HELD IN OPEN COURT AT 1:48 P.M.,
2 ATLANTA, GEORGIA.)

3 THE COURT: You-all can be seated.

4 Okay. Is there anything before we start the
5 closings?

6 MR. SAVITZKY: No, your Honor.

7 MS. KHANNA: Sorry. Just one administrative matter
8 I'm not sure we've clarified. Your Honor had mentioned
9 earlier this week about providing any substantive proposed
10 edits on the transcripts.

11 THE COURT: Yes.

12 MS. KHANNA: I'm assuming that's not by close of
13 trial today?

14 THE COURT: No. No. No. No, I wanted it an hour
15 ago.

16 MS. KHANNA: I guess we'll just stop talking.

17 THE COURT: No. What about by Monday?

18 MS. KHANNA: That sounds great, Your Honor. Thank
19 you.

20 MR. SAVITZKY: Fine, Your Honor. Thank you.

21 MR. TYSON: Fine for us as well.

22 THE COURT: All right. And we still have the
23 scheduled conclusions of law and facts you-all get to me by
24 the 25th.

25 Okay. Mr. Savitzky, are you going first?

1 MR. SAVITZKY: Yes, Your Honor.

2 THE COURT: All right.

3 MR. SAVITZKY: Good afternoon, Your Honor.

4 THE COURT: Good afternoon, sir.

5 MR. SAVITZKY: Ari Savitzky for the Alpha Phi Alpha
6 plaintiffs. We'd like to reserve five minutes for rebuttal.

7 THE COURT: Okay.

8 MR. SAVITZKY: And before I start the argument
9 proper, I just want to make two points.

10 First, I want to acknowledge Ms. Katie Bailey Glenn
11 of McDonough, Georgia, one of the individual plaintiffs in the
12 Alpha Phi Alpha case is in the courtroom with us today.

13 THE COURT: Good to have you, ma'am. Glad to have
14 you here with us.

15 MR. SAVITZKY: Thank you, Your Honor.

16 THE COURT: Thank you. Thank you, ma'am.

17 MR. SAVITZKY: I also want to acknowledge and thank
18 again the Court staff, specially the court reporters, for
19 their tireless efforts over the last two weeks. I know that
20 we take personal responsibility. I haven't always made it
21 easy for them. Thank you.

22 The *Gingles* vote dilution framework carries out
23 Congress's clear command: To prohibit voting schemes that
24 have discriminatory results, regardless of intent. *Gingles*
25 has been applied by courts for decades. And in *Milligan*, the

1 Supreme Court took it up, reviewed it, and left it virtually
2 untouched.

3 This case raises important questions; no doubt. The
4 facts are complex; no doubt. But there's also no doubt about
5 this, on this trial record, on this evidence, we have shown
6 that the *Gingles* results test is met.

7 In the areas of focus in the Alpha Phi Alpha case,
8 reasonably configured Black majority districts can be drawn
9 consistent with traditional districting principles, *Gingles* 1.
10 And persistent, stark patterns of racially polarized voting
11 exist, such that Black voters, despite voting cohesively for
12 preferred candidates, are shut out of power outside of Black
13 majority districts. That's *Gingles* 2 and 3.

14 It's the very unusual case where those conditions are
15 shown to be present and a determination of vote dilution
16 doesn't follow. And there's a reason for that.

17 Once those preconditions are met, we know we're
18 likely looking at a situation where the combination of
19 district lines and racially polarized voting patterns are
20 operating in a particular area to lock Black voters out of
21 power. This is the submergence dynamic that *Gingles*
22 recognized. The evidence shows that is exactly what is
23 happening here in the specific areas of Georgia that
24 plaintiffs are challenging.

25 The evidence on the totality of the circumstances

1 shows that this is not that very unusual case where we have
2 such confidence in the openness of the political process that
3 we can overlook that dynamic of submergence.

4 So what I want to do now is go through the elements
5 to show how we have proved our case piece by piece, brick by
6 brick. And along the way I want to take on some of the
7 arguments that Mr. Tyson has raised over the last two weeks.

8 *Gingles* 1. We've heard a lot of opinions about maps
9 in the last two weeks, spent a lot of time looking at maps, a
10 lot of time talking about maps. I think we can all agree no
11 two mappers are going to draw a map in the exact same way.
12 And that's why the *Gingles* 1 standard is straightforward, it's
13 flexible. Can reasonably configured Black majority districts
14 be drawn consistent with traditional districting principles?

15 And the *Milligan* case shows exactly the types of
16 things that you should be thinking about and looking at to
17 answer that question. Are the illustrative plans that have
18 been proposed comparable to the enacted plans in terms of the
19 objective metrics that one uses to assess a map?

20 Did the map drawer credibly testify that he balanced
21 the various districting principles that race did not
22 predominate among the various considerations?

23 Did the mapper back that up with specific reasons
24 supporting the mapping decisions taken?

25 Did the plaintiffs put forward additional evidence to

1 show that the illustrative plans offered maintain and respect
2 communities of interest?

3 Here's what the trial record shows.

4 Bill Cooper did a detailed demographic analysis
5 demonstrating that there are areas in the state where Black
6 population is numerous and concentrated. No one disputes the
7 demographic reality. In South Metro Atlanta the population
8 has changed completely. Those trends of mass growth,
9 diversification, suburbanization and development are
10 continuing.

11 And in other specific areas of the state, the eastern
12 end of the Black Belt, Macon Metro, Southwest Georgia, a
13 combination of Black population growth and white population
14 decline has similarly changed the demographic reality. But
15 what has not changed is the political reality.

16 As Mr. Cooper showed, number of Black majority
17 districts has remained essentially static since before the
18 2010 census. He called it baffling, is what he said on the
19 stand.

20 Cooper's illustrative plans draw additional majority
21 Black districts consistent with traditional districting
22 principles in all those areas that I mentioned. And on the
23 objective metrics, looking at that first consideration I
24 mentioned, Cooper's illustrative plans are comparable to or
25 better than the enacted plans in terms of population

1 deviation, compactness scores, county splits, VTD splits,
2 municipal splits, regional commission area splits, metro area
3 splits, incumbent pairings, all while adding those additional
4 Black majority districts.

5 None of that's disputed. Defendants' mapping expert
6 confirmed it. Those metrics are powerful evidence of a
7 balanced plan with reasonably configured districts, just like
8 the evidence in *Milligan*.

9 And Cooper also gave detailed and consistent
10 testimony that he understood, that he considered, that he
11 balanced those principles. He worked hard to successfully
12 stay within that tight 1 percent, 1.5 percent deviation. He
13 eyeballed those districts.

14 He minded the locations of incumbents as best he
15 could. He worked to keep counties and VTDs and municipalities
16 whole. And he also considered communities of interest and
17 integrated research and his deep knowledge of Georgia's
18 demographics from drawing many maps in the state into his
19 plans and his report and his testimony.

20 And he also detailed the limited and reasonable way
21 that he considered race, how race was one factor in his
22 analysis. He was aware of it, but what he said is it didn't
23 control how any of these districts were drawn.

24 Cooper's testimony was specific and credible. He's
25 been qualified as an expert in over 50 cases. He's drawn

1 plans from Lumber City to Emanuel County to Henry to Fayette.
2 Courts use his plans. He cares about his plans. He cares
3 about getting them right.

4 As the Court may remember from the PI stage of this
5 case, when Mr. Cooper thinks that even a single district in
6 his plan is not ready for prime time, he says so.

7 In this trial he was cross-examined on the stand for
8 four hours. He was repeatedly shown racial heat maps made by
9 the defendants' expert that he had never seen before, maps
10 that he found upsetting because, as he told the Court, they
11 overemphasize race, they distort the map drawing process,
12 they're inconsistent with his balanced approach. Mr. Cooper
13 did not waver.

14 He asked -- when he was asked again and again about
15 every VTD in every county, he was able to articulate the
16 reasons for why he configured the districts the way he did.
17 And after all that, he told this Court in no uncertain terms
18 that his illustrative plans are ready to go. His plans are
19 reasonable, he told you, and balanced, and they could serve as
20 a remedy for vote dilution.

21 This Court can take Mr. Cooper's plans and his
22 credibility to the bank just like the Court did in *Milligan*.

23 A local appraisal starts with geography. I want to
24 touch on the districts that Mr. Cooper included in his
25 illustrative plans briefly.

1 Illustrative Senate District 28 in the South Atlanta
2 Metro, Cooper testified he drew a compact district. The
3 communities in the district are close to one another, they're
4 connected to one another. He minded the population deviation
5 in this district, connected suburban communities, considered
6 socioeconomic data.

7 And Sherman Lofton, by the way, also testified about
8 the connections in these communities. He told you if you go
9 to a shopping center in Griffin, you're going to see license
10 plate tags from Fayette and Clayton County.

11 Let's look at Senate District 17. Mr. Cooper is
12 familiar with Henry County. He testified he relied on that.
13 And he also considered geographic proximity of the communities
14 being connected, the suburban nature of these areas, suburban
15 Atlanta. Sharing an identity as part of Metro Atlanta. The
16 compactness of the district. The State's district stretched
17 all the way out to Morgan and Walton County. Mr. Cooper drew
18 a more -- as defendants' expert admitted, more geographically
19 compact district.

20 And again, Sherman Lofton, who lives in McDonough,
21 testified about the connections between communities like
22 McDonough and Stonecrest and Conyers in this district.

23 Moving to District 23. Again, Mr. Cooper drew a
24 district that united communities of interest, moving
25 east-west, across Georgia's Black Belt. He considered

1 socioeconomic data. He sought to keep counties whole. Same
2 number of county splits as the districts in the enacted map,
3 same distance across. And where he split a county, he
4 followed municipal lines and county commission lines.

5 And as to this district, we have, additionally, the
6 testimony of Dr. Traci Burch talking about the political
7 identity of the Black Belt and its unique political history.
8 And we also have the testimony of Dr. Diane Evans who
9 discussed common interests in this area and how residents
10 there are served by the same grocery stores, commercial
11 centers, hospitals.

12 Moving to District 74. I don't even need to spend
13 much time on this district. Mr. Cooper testified it couldn't
14 be more compact. It is almost a perfect square. Mr. Cooper
15 looked at municipal boundaries, he kept the deviation in line,
16 he ensured compactness, he drew in a suburban area. We've
17 heard a lot about the -- how the tail of Clayton County is
18 suburban, similar to the other portions in this incredibly
19 small and compact district that Mr. Cooper drew.

20 Let's look at District 117. Very similar area,
21 again. No one disputes the obvious compactness of this
22 district. Defendants' expert agreed it was compact, uniting
23 proximate communities. Sherman Lofton testified about the
24 connections here. He talked about the Tanger Outlets in
25 Locust Grove, talked about driving down 155 and about the

1 tremendous demographic change in this area.

2 Moving to District 133. Mr. Cooper testified again
3 about connecting communities in the historic Black Belt, about
4 connecting counties with shared socioeconomic commonalities,
5 about avoiding incumbent pairings, and balancing compactness
6 and VTD lines and municipal lines as he drew the lines here
7 around Milledgeville.

8 Moving to 145, unless the Court would like to look at
9 it a little more.

10 THE COURT: Yeah. Click it back for one second.

11 MR. SAVITZKY: Sure.

12 Testified about keeping municipalities together as
13 best he could.

14 THE COURT: Thank you.

15 MR. SAVITZKY: 145, again, despite not including
16 anything about it in his report, defendants' expert concedes
17 it's compact, District 145. Mr. Cooper discussed keeping the
18 district in the Macon-Bibb metro area, discussed how
19 incumbents affected his map drawing decisions, discussed
20 following county lines and VTD lines.

21 Moving to District 171. And this district in
22 Southwest Georgia, Mr. Cooper testified about the
23 transportation connections in this district. There's evidence
24 in the record now about the ways in which the different
25 communities in this district, the different municipalities,

1 Albany, Pelham, Camilla, Thomasville, work together on common
2 projects within the Southwest Georgia region. District
3 connects rural counties, rural areas, areas that have somewhat
4 higher levels of poverty.

5 And by the way, Bishop Jackson testified about this
6 area as well. Describing the area as a little more rural or
7 more agrarian; sharing similar attributes, similar levels of
8 education, socioeconomic attributes.

9 And we can take this down for now.

10 As the Court knows, *Gingles* 1 is not a beauty
11 contest, but if it were a beauty contest, I'd like our odds.

12 And we can do the next slide.

13 Every single consideration that supported the Supreme
14 Court's affirmance in *Milligan* is present in this record,
15 grounded in highly credible testimony by the very same mapper
16 and objective facts as set out in the metrics in the maps.

17 So what does the defense say to all this? Not much.
18 Mr. Tyson's tried to argue that race predominated in the
19 illustrative plans. But the evidence is in. Facts don't back
20 up the argument. Again and again Mr. Tyson asked Mr. Cooper
21 why he drew a district one way or the other. And again and
22 again Mr. Cooper testified, while he was aware of race, he
23 made his decisions about where to draw lines by balancing all
24 of the traditional principles. And we just went over a few of
25 the considerations he considered in reviewing the districts

1 now.

2 THE COURT: Will this PowerPoint be provided to me
3 when you finish?

4 MR. SAVITZKY: Yes, Your Honor. We're still printing
5 it out, but we will provide it to you.

6 THE COURT: Thanks. Sorry to interrupt you.

7 MR. SAVITZKY: Your Honor, I submit this Court can
8 resolve the defense's racial predominance argument on
9 Mr. Cooper's credibility alone.

10 And the defense talked about racial shading, racial
11 splits in their summary judgment papers. That's not what the
12 evidence showed at trial. Mr. Cooper made clear he doesn't
13 use those racial shading maps. Defense's own expert didn't
14 back up even his very limited and ambiguous claims about the
15 prioritization of race in the illustrative plans. He didn't
16 even disagree that Mr. Cooper's plans are consistent with
17 traditional districting principles. He barely read
18 Mr. Cooper's report.

19 And his analysis consists mostly of cherry-picking,
20 inconsistencies, and, again, those racial shading maps that
21 distort much, much more than they reveal. On this record the
22 Alpha plaintiffs have met *Gingles* 1.

23 Moving to *Gingles* 2 and 3. Evidence demonstrates
24 we've proven those preconditions as well. Mr. Tyson continues
25 to argue that Section 2 plaintiffs have to prove a negative,

1 that is to prove that party or partisanship is not the reason
2 for racially polarized voting patterns.

3 We don't need to prove a negative at any stage. That
4 is not the standard at any stage. But I will address the
5 arguments about party and race and I'll do it where they
6 belong, with the totality of the circumstances.

7 So just on *Gingles* 2 and 3, the Court has the law
8 right. We need to show that majority voter political cohesion
9 and racial bloc voting exist. That's what we need to show.

10 And on the evidence, no one disputes that this
11 pattern of racially polarized voting exists in the areas of
12 interest here, in the areas where those districts are drawn.

13 Dr. Lisa Handley conducted racial bloc voting
14 analyses in this case. She's done the same analysis, using
15 the same methodology hundreds of times. She used it in her
16 report. She described it on the stand.

17 As to *Gingles* 2, Dr. Handley offered detailed
18 testimony regarding racial bloc voting and the ability of
19 Black voters to elect candidates. She looked at 16 statewide
20 elections. She looked at 54 state legislative general
21 elections right in the areas of interest in the South Atlanta
22 Metro, in the eastern end of the Black Belt, in Macon, in
23 Southwest Georgia. And in each of those areas she found
24 starkly polarized voting patterns with Black voters
25 overwhelmingly supporting one candidate and white voters

1 consistently bloc voting against Black preferred candidates.

2 That pattern of racially polarized voting is not
3 contested. The parties have actually stipulated to it.

4 Now, on *Gingles* 3 the question is, do these voting
5 patterns mean that Black voters' preferred candidates are
6 typically defeated? Also have to show that.

7 In other words, given these district lines that were
8 drawn, does racially polarized voting operate to submerge --
9 we talked about this submergence dynamic -- operate to
10 submerge Black voters such that they have no opportunity to
11 elect their preferred candidates?

12 The answer is yes. Dr. Handley testified that
13 because of this uncontested, starkly racially polarized
14 voting, Black voters in the areas of focus will be submerged
15 unless district boundaries are drawn to provide Black voters
16 with an opportunity to elect candidates of choice.

17 And she also testified that in the specific areas of
18 focus, in the South Atlanta Metro, in the Eastern Black Belt,
19 in the Macon Metro, in Southwest Georgia, the only districts
20 that provide Black voters with an opportunity for electoral
21 success, given this level of racially polarized voting, are
22 majority Black districts, including the districts drawn by
23 Mr. Cooper.

24 *Gingles* 2 and 3 are met.

25 So I want to transition to totality of the

1 circumstances then. Again, the 11th Circuit has said it will
2 be only the very unusual case where liability doesn't follow
3 once you meet those preconditions. And, again, that's because
4 once you've established the preconditions, you've demonstrated
5 that Black voters are being shut out of power by racially
6 polarized voting patterns, even though the lines could
7 reasonably have been drawn to give Black voters an opportunity
8 to elect candidates of their choice.

9 And so the totality of the circumstances portion of
10 the inquiry, we look around at the big picture. We make that
11 fact-driven appraisal of the areas of focus. We asked, what
12 is the context in which the challenged districts were drawn?
13 Does an examination of this context give us some comfort that
14 even though the district lines and the persistent patterns of
15 racially polarized voting do combine to shut Black voters out
16 of power in the areas of focus? Even though that is
17 happening, nevertheless, there are good reasons to conclude
18 that the political process is actually equally open.

19 The trial record here does not provide that comfort.
20 The trial record here does not show that there is no cause for
21 concern. The trial record makes clear we cannot feel
22 comfortable that the political process is equally open in
23 these areas where Black voters have been drawn into districts
24 that will shut them out of power.

25 So before I move to the Senate factors, address them

1 one by one, I want to address one of the primary arguments the
2 defense has brought up, which I think the trial record has
3 revealed is just not supported by the facts, and then I'll
4 turn to the overall totality piece.

5 So I'm starting with Senate Factor 2 because it gets
6 to this argument that the defense is making. At bottom they
7 say voter behavior, the voter behavior we see in Georgia, is
8 party polarization that is being driven by party and not by
9 race.

10 Now, let's be clear. Whether they can mount that
11 defense and succeed is a fact question for this Court to
12 resolve. And on this trial record, the evidence does not back
13 them up. Instead, it shows that race and racial politics are
14 the best explanation for voter behavior, for the behavior that
15 we see.

16 Now, again, Dr. Handley, Dr. Burton, Dr. Jones all
17 testified about the extent to which voting in Georgia is
18 racially polarized. Starkly polarized.

19 And just the fact of that stark polarization creates
20 an inference, as Judge Tjoflat's *Nipper* opinion said, that
21 racial bias is at work.

22 Judge Wisdom wrote in the *Marengo County* case,
23 "Racially polarized voting is the surest indication of
24 race-conscious politics."

25 And so with that inference in place, how do we look

1 at this question of party or race at the totality of the
2 circumstances stage?

3 On the one hand, in the Section 2 results case
4 plaintiffs do not have the burden to affirmatively prove the
5 ultimate cause of unequal opportunities for Black voters.
6 That's not our burden. We certainly don't need to show intent
7 or animus of any kind. And that's why we can put that *League*
8 *of Women Voters* case to the side, at least when it comes to
9 applying the *Gingles* results test.

10 But the defendants can try to mount a defense. They
11 can try to rebut proof of vote dilution by showing that losses
12 by minority-preferred candidates are attributable to nonracial
13 causes. That's what *Nipper* says.

14 And I understand that that is what the defense is
15 trying to do. But this trial record does not let them do
16 that.

17 Relying on the testimony of Dr. Alford, whose
18 testimony has been discredited time after time, they point out
19 the undisputed fact that in recent general elections Black
20 voters have voted for Democratic candidates and white voters
21 have voted for Republicans. Therefore, they say party
22 explains voting behavior. Post hoc, ergo propter hoc. After
23 this, therefore because of it.

24 Your Honor, the defense's picture of voter behavior
25 is a thin impoverished account of why voters behave the way

1 they do. Ask them, why do we see such stark patterns of
2 racially polarized voting in Georgia? They said it's party.

3 Ask them, well, why are the party lines also the
4 racial lines? They have no answer. They can't answer that
5 question. Their position is racial determinism. Black voters
6 vote for Democrats, white voters vote for Republicans; that's
7 how it is.

8 That's not good enough. Why? Why do we see these
9 patterns of racially polarized voting, these stark patterns,
10 these persistent patterns, the surest indication of
11 race-conscious politics? History tells us why if we listen.
12 Political context tells us why if we listen. The data tells
13 us why if we listen.

14 In this trial record the Alpha plaintiffs have
15 amassed powerful, affirmative evidence that confirms that it's
16 race that best explains the racially polarized voting patterns
17 in Georgia that we see.

18 Dr. Jones, Dr. Ward, Dr. Burton, Dr. Handley all
19 testified repeatedly, consistently, that you can't talk about
20 partisanship without talking about race. Black and white
21 voters have, over decades, realigned their partisan
22 affiliations based on the parties' positions with respect to
23 racial equality and civil rights.

24 Simply put, voters vote their values and their
25 interests. And that includes their perceived interests on

1 those important issues. When parties and candidates change
2 their message and their positions on the issues that relate to
3 racial equality and the interests of Black voters, the voters
4 listen, they respond. History bears this out.

5 As Dr. Ward noted in his report, he testified on the
6 stand, race has consistently been the best predictor of
7 partisan preference since the end of the Civil War through
8 various realignments between the parties.

9 As Dr. Jones explained, because partisan affiliations
10 has shifted and realigned but racial division has remained
11 consistent, partisanship can't explain the lack of political
12 opportunity for Black voters rooted in that division.

13 And whether it's southern Democrats or the Republican
14 Party since 1965, parties and candidates mobilize and energize
15 voters using racial division. That's what Dr. Jones
16 testified.

17 To use Dr. Alford's term, the cue is not the race of
18 the candidates. The cue is their positions on the issues to
19 which voters respond. History bears that out. Political
20 context bears that out. Dr. Jones and Dr. Burton explained
21 how racial appeals are used to signal the positions of the
22 candidates and the parties and to drive voter behavior.

23 Dr. Jones explained how racial appeals signal to
24 voters that it's the Republican Party that's the party of
25 white voters. Dr. Burton lamented the use of these appeals

1 and noted that they're still used because they have an effect.

2 The history, the political context, the data bears it
3 out as well. Dr. Handley testified directly on that point,
4 describing racially polarized voting in primary elections that
5 necessarily cannot be explained by party. It's an intraparty
6 election and you still see the polarization.

7 She testified that in the Democratic primary races
8 that she analyzed a majority of those contests were polarized.
9 The racial cohesion in those primary elections may not have
10 been the same as the general, but it's there. And party
11 cannot explain it.

12 History, political context, data. The record does
13 not support the defense's suggestion that Black voters and
14 white voters' support for particular parties are
15 predetermined. It shows the opposite.

16 Bishop Jackson testified, Blacks, like everybody else
17 in this state, want to vote in their best interests. And I
18 think their best interests depends upon who the candidates are
19 and the position on the issues.

20 No doubt the question of what accounts for polarized
21 voting, that ultimate question, is a complex one of fact.
22 It's not one that we need to prove.

23 On this record the overwhelming evidence is that race
24 best -- better explains the undisputed patterns of racially
25 polarized voting that we see in Georgia.

1 Let's now really turn to the totality of the
2 circumstances. And we don't disagree, Your Honor, with
3 Mr. Tyson that the ultimate question, as the statute says, is
4 about whether the political process is equally open. And,
5 again, it's an intensely local appraisal.

6 It is a good thing that Georgia has automatic voter
7 registration. It is a good thing that Raphael Warnock can be
8 elected to the United States Senate. It is a good thing that
9 we no longer live in the days of poll taxes and grandfather
10 clauses.

11 But these things can be good and great and signify
12 change and still not answer the question for this Court.
13 Because the question for this Court is different. It's more
14 specific. Is the political process equally open in these
15 areas, in these district-based state legislative elections,
16 despite the fact that in these areas and in these districts
17 Black voters have been drawn into districts that will shut
18 them out of power due to racial bloc voting? And the evidence
19 in this trial record shows that the answer is no. Senate
20 Factor 1 to Senate Factors 1 and 3.

21 Mr. Tyson said himself on the first day here, Georgia
22 obviously has a long history of official racial
23 discrimination. Dr. Jones, Dr. Ward, Dr. Burton all detailed
24 extensively this history of centuries of state-sanctioned
25 efforts to fence Black voters out of political power and the

1 political process.

2 And this long and painful history includes the use of
3 voting practices and procedures that enhance the opportunity
4 to discriminate, some of them listed on this slide.

5 The defense argues this is all in the past. Somehow
6 it has no impact on why we're all here today. That's not what
7 the evidence in this record shows.

8 As Dr. Jones testified, some of the methods that the
9 State is using today are exactly the same as those that were
10 used historically.

11 Dr. Burton testified, some of the most egregious
12 discriminatory practices are still within the living memory of
13 many Georgians, many Georgians in 2023.

14 As we mentioned on Monday, at-large county elections
15 in Fayette County were in place until they were struck down by
16 a federal court under Section 2 until 2015.

17 And as Dr. Jones and Dr. Ward and Dr. Burton all
18 testified, discriminatory voting practices have not just
19 persisted, they're evolved. As Dr. Burton testified, every
20 time that Black citizens made gains in some way or another,
21 were being successful, party and power in the state, whether
22 it's Democratic or Republican, found ways or came up with ways
23 to either disenfranchise or particularly dilute or in some
24 ways make less effective the franchise of Black citizens.

25 Practices like voter roll purges, identification

1 requirements, voter challenges, the removal or attempted
2 removal of Black elected officials are new incarnations of the
3 same kinds of tactics.

4 Whether intentionally or not, whether or not they've
5 been found to be legal, these practices disproportionately
6 burden Black voters. They continue to do so today.

7 Looking at Senate Factor 5, the evidence shows that
8 racial disparities persist in Georgia with Black voters worse
9 off when it comes to education, income, employment, health,
10 criminal justice. Those disparities are not a random or
11 natural occurrence. As Dr. Traci Burch testified, they're the
12 result of a long history of racial discrimination.

13 And Dr. Burch testified that those disparities make
14 it more difficult for Black voters to participate in the
15 political process. They're correlated with higher burdens on
16 political participation.

17 And Dr. Burch also looked directly at participation.
18 She observed a turnout gap between Black and white voters in
19 the specific areas of focus in this case, where the district
20 lines have been drawn resulting in Black voters being shut out
21 of power. She found this turnout gap using multiple methods
22 using the State's own data.

23 And defendants' view is that Black voters' personal
24 choices explain the disparity in voting participation. That's
25 been suggested. But as Dr. Burch showed, the turnout gap is

1 not about the personal choices of voters. As she testified,
2 if Black Georgians simply didn't want to vote, you would see
3 Black turnout that's lower than white turnout across every
4 level of education. But, instead, what you see when you look
5 at the data, is that Black Georgians are voting at higher
6 levels than white Georgians at particular educational
7 attainment levels.

8 But there's still an overall gap in turnout. And
9 that's because Black Georgians are concentrated more in the
10 lower educational attainment levels and, therefore, most
11 acutely experience those burdens on voting.

12 It's no response to point out the good things that
13 Georgia has sometimes done to promote participation. Although
14 some of those things truly are good.

15 As Dr. Burch testified, the unequal burdens on
16 participation that flow from the socioeconomic disadvantages
17 of discrimination are true and persist regardless of the
18 particular rules of the election system.

19 Moving to Senate Factor 6. The evidence shows that
20 racial appeals sadly persist in Georgia politics. Dr. Jones
21 testified that racial appeals are used to create fear and
22 concern about Black people and galvanize majority voters based
23 on the idea that voting for a Black person would be
24 problematic. That was her testimony.

25 She highlighted ads against Black candidates that

1 invoke discriminatory tropes to make Black candidates more
2 unelectable in the mind of voters. She used powerful and
3 recent examples. And she explained why it makes sense to
4 consider these racial appeals as evidence here, even if the
5 candidate who is targeted by them ultimately prevailed. Those
6 ads, she testified, tell us that candidates think that racial
7 appeals work. They think they work; that's why they persist.

8 And it's actually telling, she explained, that racial
9 appeals are used even, or especially, when a candidate appears
10 strong.

11 Moving to Senate Factor 7. Dr. Jones testified the
12 underrepresentation of Black Georgians in elected office
13 persists. Most importantly she testified that
14 underrepresentation is apparent in the specific areas at issue
15 in this litigation and the precise areas of focus here.

16 Dr. Jones' unrebutted analysis demonstrates that the
17 specific district areas of interest in the South Atlanta
18 Metro, in the eastern end of the Black Belt, in the Macon
19 Metro, in Southwest Georgia, have largely failed to elect
20 Black General Assembly members over the last 20 years. That's
21 precisely the type of evidence that speaks to that Section 2
22 intensely local appraisal.

23 And, finally, on Senate Factor 8, that
24 underrepresentation matters. As Dr. Burch testified, elected
25 officials in Georgia have not taken concrete steps to address

1 too many of those issues where persistent racial disparities
2 exist and persist for Black Georgians.

3 And Dr. Burch also testified that Black Georgians
4 themselves report feeling less satisfied with public
5 officials, the direction of the State, the quality of
6 government services.

7 And the complexities of the statute aside, and I
8 understand the complexities of the statute have been discussed
9 in this courtroom; S.B. 202 is case in point here. As
10 Dr. Burch testified, 70 percent of Black Georgians believe it
11 was passed to make it more difficult for certain groups to
12 vote rather than to increase voter confidence.

13 The failure of responsiveness contributes there.
14 Fair representation would make a difference. As Sherman
15 Lofton testified, the Alphas volunteered to encourage
16 participation in the 2020 census because it was understood
17 that the census would impact redistricting and representation.

18 Districts that dilute the voting strength of Black
19 voters tarnish the efforts of the Alphas and the church and so
20 many others across party and ideological lines who understand
21 that fair representation and responsive government go hand in
22 hand.

23 I want to try and anticipate Mr. Tyson a little bit.
24 He's repeatedly raised the question, how much is too much?
25 Isn't this enough? But there is, I think, an unstated point

1 there, which is, it could be worse.

2 As the Court will remember, to put a point on it,
3 defense submitted into evidence an illegal map, one with no
4 analytical value to show anything to be sure, but they
5 submitted it showing how much worse it could be, showing that
6 some mapper could draw even fewer Black majority districts.

7 I don't have to tell the Court that it could be worse
8 is not the standard. We agree that the ultimate question is
9 about the openness of the political process. It could be
10 worse does not speak to the openness of the political process.
11 It does not speak to whether elections for state legislative
12 districts in these areas are equally open.

13 When the State draws legislative districts that
14 needlessly shut Black voters out of power due to bloc voting,
15 to racial bloc voting, it tells us that the political process
16 in those areas, in those districts, is not equally open.

17 When the population of Black Georgians grows by over
18 a million and yet the number of Black majority districts
19 barely bulges, it tells us that the political process in those
20 areas, in those elections is not equally open.

21 When voting practices with discriminatory and
22 disparately burdensome effects, whether legal or illegal,
23 persist and new ones keep cropping up, it tells us the
24 political process is not equally open.

25 When racially polarized voting patterns, the surest

1 indication of racial politics at work, persist in election
2 after election after election, it tells us that the political
3 process in these areas, in these districts, is not equally
4 open.

5 When there's a gap in turnout in political
6 participation, despite all the efforts of Black voters to
7 exercise hard won political rights, where the evidence shows
8 that this gap is born out of disparities in education, in
9 employment, in health, that are the direct legacy of
10 discrimination, it tells us the political process in these
11 areas, these districts is not equally open.

12 When shameful racial appeals persist, and even seem
13 to get worse, it tells us the political process is not equally
14 open.

15 When underrepresentation in the halls of power,
16 especially in the state legislature, especially in districts
17 in the South Atlanta Metro, in the eastern end of the Black
18 Belt, in Metro Macon, in Southwest Georgia persists, it tells
19 us the political process is not equally open in those areas,
20 in these districts.

21 And when the needs of Black Georgians are too often
22 unmet, when the disparities that Black Georgians shoulder are
23 too often unaided by government, when faith in the willingness
24 or ability of representatives to respond to those needs is
25 difficult to muster, it tells us the political process is not

1 equally open.

2 Looking at the totality of the circumstances in these
3 areas, in these legislative district elections, we see
4 precisely the dilution and submergence of Black voters' voices
5 due to racially polarized voting that *Gingles* and the results
6 test guard against.

7 Now I hear another argument from Mr. Tyson in my ear,
8 something to the effect of, where does it end? Where does it
9 stop? When the racially polarized voting patterns stop.
10 That's when it ends.

11 And I think Justice Jackson's description in the VRA
12 during the oral argument in *Milligan* speaks directly to this
13 point. In the VRA Justice Jackson described -- she used the
14 word "self-liquidating." Self-liquidating.

15 When racially polarized voting patterns persist,
16 Section 2 ensures that those voting patterns ordinarily cannot
17 be combined with district lines to dilute, submerge, Black
18 voters' voices. But the flip side of that is that when those
19 polarized voting patterns stop, the problem of submergence
20 goes away. That's when it ends.

21 When candidates and parties stop dividing Georgians
22 with racial appeals, that's when it ends.

23 When candidates and parties' positions and voters'
24 behavior in response are no longer organized around basic
25 questions of racial equality, that's when it ends.

1 When racial division no longer structures our
2 politics, that's when it ends.

3 Changing Georgia politics is not something this Court
4 can order and it's not what we're asking the Court to do.

5 THE COURT: Thank you.

6 MR. SAVITZKY: But make no mistake, it is something
7 that can change. It can.

8 Here in this room, though, all we can do is make a
9 record about the facts as they exist and apply the law, the
10 Gingles results test as it stands.

11 On this trial record, in this moment in time, in
12 these areas of Georgia, in these legislative district
13 elections, the Alpha plaintiffs have proven their case.

14 We ask the Court to find for the plaintiffs and to
15 order a remedy into place.

16 THE COURT: Thank you, Mr. Savitzky.

17 We're going to take a ten-minute break and then we're
18 going to start the Grant/Pendergrass closing at 3:00.

19 (After a recess, the proceedings continued at
20 2:50 p.m. as follows:)

21 THE COURT: Ms. Khanna, I'm ready when you are.

22 MS. KHANNA: Good morning, Your Honor. Abha Khanna
23 on behalf of the Pendergrass and Grant plaintiffs.

24 It's been a long couple of weeks. And for the
25 plaintiffs who filed these lawsuits against the enacted maps

1 back in December of 2021, it has been a long couple of years.
2 In that time we've had the equivalent of two trials on these
3 maps.

4 We've seen the fundamental tenets of Section 2 of the
5 Voting Rights Act tested and tried before the US Supreme
6 Court. And we've seen an entire election come and go based on
7 districts that were and continue to be unlawful.

8 Your Honor is very familiar with the Section 2 test.
9 It's the same test applied by this Court in determining that
10 plaintiffs were likely to succeed on the merits of their
11 claims during the preliminary injunction phase. And it's the
12 same test reaffirmed by the US Supreme Court in *Allen v.*
13 *Milligan*.

14 So before I walk through the elements of that test,
15 I'd like to take some of my time this afternoon to respond to
16 some of the key arguments raised by the defendants because
17 it's not -- I don't think that test is really any longer in
18 dispute. Instead at times it has felt like we are litigating
19 an entirely different case than they are.

20 And so before we close the books on these
21 proceedings, I want to make sure to address any questions or
22 concerns that this Court might have about what it is we are
23 actually still fighting about here.

24 Now, at the very outset of his opening statement
25 Mr. Tyson invoked what he referred to as defendants'

1 big-picture argument. And that is whether Georgia's election
2 system is equally open, where Black preferred candidates have
3 shown an ability to win statewide.

4 As I understand this argument, Your Honor, defendants
5 are saying in light of the success of Black preferred
6 candidates in Georgia, can't the State just call it a day on
7 the Voting Rights Act? Haven't we given enough opportunities
8 to Black voters?

9 Let's take a look at the data points the defendants
10 rely upon for this argument.

11 First, they point to the success of Black preferred
12 candidates on a statewide basis. Here in the transcript in
13 his opening statement, Mr. Tyson specifically referenced the
14 election of Reverend Warnock.

15 Now, to hear defendants tell the story, Black and
16 white Georgians have come together and joined hands across the
17 state to achieve a level of racial unity and racial equality
18 we could never have dreamed about in 1965 when the Voting
19 Rights Act was enacted.

20 The reality is something quite different. Not to say
21 there have not been gains since 1965, but as an initial matter
22 it's worth noting that Senator Warnock was elected for the
23 first time in 2020, one year before we filed these lawsuits.
24 And I'd submit that the last two years of his success on a
25 statewide basis does not stamp out the previous 200 years

1 where that almost never happened.

2 But even more importantly, Senator Warnock's success
3 does not reflect some kind of post-racial utopia. It instead
4 reflects a drastically different demographic reality and trend
5 than we saw 50 or 30 or even 10 years ago.

6 White Georgians have dropped from a super majority
7 statewide to a razor thin majority. Black Georgians, by
8 contrast, have grown from a quarter to more than a third of
9 the statewide populations. And Georgia has essentially become
10 a majority-minority state.

11 What that means is white voters, in losing their
12 numbers, have lost some of their electoral power statewide.
13 By contrast, Black voters, as well as other minority voters
14 who are only gaining in population, are on the verge of
15 gaining electoral power statewide. That is a significant
16 thing indeed.

17 And I'd submit it's probably a scary prospect for the
18 white preferred candidates and elected officials who have
19 controlled the political process in Georgia for so long. But
20 the fact remains that in statewide elections, unlike in
21 districted elections, the State of Georgia cannot dilute the
22 Black vote by drawing districts that minimize that growing
23 Black voting strength.

24 Defendants also refer to Georgia's congressional
25 delegation. And specifically Congresswoman McBath's district,

1 which they've repeatedly reminded us has just under 30 percent
2 Black voting age population. But they're not telling us the
3 full story there either.

4 Congressional District 7 in Gwinnett County is a
5 majority-minority district. Now, to be clear, there's nothing
6 in the record about the preferences of each racial group in
7 this district and the performance for each racial group's
8 preferred candidates. But to the extent that defendants want
9 to point to CD7 to argue for proportionality or to make a
10 proportionality argument, they need to provide an
11 apples-to-apples comparison. They can't look at all minority
12 opportunity districts and measure that against the Black
13 population.

14 If they are going to look to all minority opportunity
15 districts, then the appropriate comparator is all minority
16 population. And there's a reason they don't want to talk
17 about those numbers in their discussion of proportionality.
18 Because, as we know, racial minorities comprise nearly half of
19 Georgia's total population.

20 True proportionality on that basis would mean 7 out
21 of 14 congressional districts for minority preferred
22 candidates, 28 Senate districts for minority preferred
23 candidates, 90 House districts for minority preferred
24 candidates.

25 And I want to be very clear, Your Honor, we are not

1 arguing for those numbers. We are not arguing for
2 proportionality. But I do want to point out that defendants'
3 emphasis on proportional voting, on *Johnson v. De Grandy*,
4 is conflating different metrics and it's pulling a
5 bait-and-switch. Even under the State's creative math, the
6 numbers just don't add up.

7 Now, at a few points in his opening statement
8 Mr. Tyson asked, What if the legislature had decided to make
9 Congresswoman McBath's district a majority Black district in
10 lieu of plaintiffs' illustrative District 6?

11 Now, the State poses this as a question. But this
12 Court should recognize it for what it is, which is a threat to
13 just trade off minority opportunities from one district to
14 another.

15 What I hear defendants saying is if plaintiffs want
16 more opportunities for Black voters in CD6, in Western Metro
17 Atlanta, the State may just choose to eliminate minority
18 opportunities in CD7, in Gwinnett County.

19 Make no mistake, the State cannot feign innocence
20 while pulling a switch -- a bait-and-switch on minority
21 voters. It cannot simply try to zero out minority voting
22 strength across the state in purported compliance with the
23 Voting Rights Act. Indeed, *Johnson v. De Grandy*, written some
24 30 years ago, saw this argument coming.

25 And there the Court rejected a proportionality safe

1 harbor precisely because of the "demonstrated ingenuity of
2 state and local governments in hobbling minority voting
3 power."

4 The *De Grandy* court rejected the highly suspect
5 premise that in any given voting jurisdiction the rights of
6 some minority voters under Section 2 may be traded off against
7 the rights of other members of the same minority class.

8 That Court went on to note that under the State's
9 view, the most blatant racial gerrymandering in half of a
10 county's single member districts would be irrelevant under
11 Section 2 if offset by political gerrymandering in the other
12 half so long as proportionality was the bottom line. And that
13 is the precise argument the State is advancing here.

14 They're asking this Court to ignore the demographics
15 and the racial voting patterns and the history and the
16 patterns of discrimination and just look at the number of
17 Democratic representatives as the bottom line. The rest will
18 all come out in the wash.

19 This Court should reject Georgia's attempt to use the
20 gains that Black and minority voters have accomplished through
21 sheer numbers to impose a ceiling on minority opportunity in
22 the state.

23 One last point on proportionality, Your Honor.
24 Defendants' apparent outrage at the very notion that Black
25 voters might get a dram more than their fair share does not

1 seem to extend to white voters. Defendants' repeatedly
2 emphasize the existence of five majority non-white
3 congressional districts as evidence of proportionality. But 5
4 out of 14, about 35 percent, is far lower than the State's
5 non-white population, which is near 50 percent.

6 And as we discussed with Mr. Morgan, 9 out of 14,
7 over 64 percent, majority white districts is far higher than
8 the State's white population, which is also near 50 percent.

9 In short, Your Honor, if the State wants to boil this
10 case down to the numbers, then it has to look at all of them.

11 But, Your Honor, that's not what this standard
12 requires. The standard is not a game of numbers and whose
13 fancy math can beat out the others. The standard is local, it
14 is detailed and it is specific.

15 I'll turn to that standard now.

16 First to *Gingles* 1. During his opening statement,
17 Mr. Tyson promised that the evidence will show that at each
18 point, when faced with a choice of accommodating a racial goal
19 or following a traditional redistricting principle, the racial
20 goal prevailed, and that plaintiffs' map drawers' pursuit of
21 a racial goal required them to disregard traditional
22 redistricting principles. That's on pages 41 to 42 of the
23 transcript of the first day of this trial.

24 Your Honor, I sure hope the Court was not holding its
25 breath in anticipation of that promised evidence, because it

1 would still be left wanting.

2 And here I'm going to break order for a little bit,
3 Your Honor, and discuss the Pendergrass case first. And
4 that's just because I don't think there's an actual dispute,
5 let alone a credible dispute, on *Gingles* 1 when it comes to
6 the congressional case. Or at the very least, I don't
7 understand it.

8 At the end of his cross-examination I asked
9 defendants' expert, Mr. Morgan, if he disputed Mr. Cooper's
10 ultimate conclusion that the Black population in Metro Atlanta
11 is sufficiently numerous and geographically compact to allow
12 for the creation of an additional majority Black district
13 consistent with traditional districting principles. And he
14 said no. He did not dispute that.

15 Your Honor, that conclusion is *Gingles* 1.

16 Now, defendants invoke the specter of racial
17 predominance. That is their story. That has been their story
18 since day one. But even their own expert, after some two
19 years of trying, Mr. Morgan, has -- could not bring himself to
20 assert that Mr. Cooper's illustrative congressional map
21 prioritizes race. And I'm willing to venture, Your Honor,
22 that that was not for lack of trying.

23 Defendants spoke of disregarding traditional
24 districting principles and object to the fact that
25 illustrative District 6 draws from existing majority Black

1 District 13. But the illustrative plan makes both districts
2 more compact than they are in the enacted plan, substantially
3 so.

4 The illustrative plan not only satisfies traditional
5 districting criteria, it surpasses the State's map in doing
6 so. Again, that's not a standard we have to meet. It's just
7 the facts. As Mr. Cooper said, this is a district, that in
8 all his years of experience, drew itself.

9 In other words, it was the State of Georgia that had
10 to bend on traditional redistricting principles to avoid
11 drawing an additional Black district in a part of the state
12 that was home to 80 percent of its population growth over the
13 last decade, more than half of which is attributable to Black
14 voters.

15 Now, defendants make a lot of hay out of the fact
16 that in other districts the illustrative plan combines parts
17 of Metro Atlanta with rural areas to the north. And here they
18 latch on to a statement by Mr. Cooper that the enacted map did
19 the same thing when it placed Cobb County residents in
20 Marjorie Taylor Greene's district.

21 Okay. Mr. Cooper did not think that the
22 configuration of Cobb County in the enacted map was necessary.
23 But at the end of the day, plaintiffs did not file an action
24 against the enacted map for its connection of rural and urban
25 communities. That is not the claim here and that is not the

1 alleged violation.

2 Plaintiffs filed an action under Section 2 of the
3 Voting Rights Act for dilution of the Black vote by failing to
4 draw an additional opportunity district where the size and the
5 location of the Black population as of 2020 all but demanded
6 it.

7 Honestly, Your Honor, I am at a loss for what could
8 possibly be the *Gingles* 1 objection to this district or this
9 map.

10 In the Grant case. Now, the *Gingles* 1 argument in
11 the Grant case against Mr. Esselstyn's map is slightly more
12 complicated solely because of the various numbers of districts
13 and locations, but it is no more availing for the defendants.

14 Now, at this point I want to just take a second to
15 note, and perhaps I'm stating the obvious, but these three
16 cases need not rise and fall together. I know we're all here
17 in the interest of efficiency, but these cases are not
18 consolidated. And perhaps the congressional case could have
19 opened and shut within a couple of days instead of a couple of
20 weeks. But, regardless, when it comes to Pendergrass and
21 Grant, the *Gingles* 2, 3 and totality analysis almost entirely
22 overlap, and the differences lie in the *Gingles* 1 inquiry.

23 Let's turn to Mr. Esselstyn's map. All of
24 Mr. Esselstyn's illustrative districts fall well within the
25 compactness range of enacted districts in Georgia. None of

1 Mr. Esselstyn's illustrative districts are sprawling or
2 connect far-flung and disparate populations. So, again, the
3 question is, what are we fighting about here?

4 Mr. Morgan launches a broadside attack on each of
5 Mr. Esselstyn's maps as focused on race to the detriment of
6 traditional redistricting principles. Now, what that
7 conclusion is based on is anyone's guess. Because to the
8 extent Mr. Morgan analyzes and opines on traditional
9 districting principles at all, his analysis is selective and
10 uneven.

11 He doesn't consistently look at any metrics across
12 districts. And even when comparing a specific set of
13 districts in the enacted plan to a specific set of districts
14 in the illustrative plans, he does not employ an
15 apples-to-apples comparison. That is either shoddy work or
16 it is selective work.

17 What is perhaps most notable from the testimony of
18 the various mapping experts in these cases is that if there is
19 one expert who has prioritized race, it is Mr. Morgan. He
20 looked only at race as a possible explanation for the
21 illustrative maps. He created these indecipherable race heat
22 maps that neither Mr. Esselstyn, nor Mr. Cooper, and I don't
23 think even the State has ever used in drawing maps.

24 And lo and behold, Mr. Morgan's singular focus on
25 race in analyzing the illustrative maps led him to conclude

1 that those maps were drawn on the basis of race.

2 But even then, with all that energy devoted to race
3 in the illustrative House and -- State and Senate -- sorry --
4 State Senate and House maps, Mr. Morgan failed to even mention
5 more than half of Mr. Esselstyn's new majority Black
6 illustrative districts.

7 Mr. Morgan testified about what he referred to as
8 Mr. Esselstyn's technique of elongating existing majority
9 Black districts to free up population for new majority Black
10 districts. But his emphasis on elongation is puzzling, to say
11 the least.

12 What traditional districting principle prohibits that
13 purported elongation? Indeed, by his own admission, that
14 purported elongation is entirely consistent with how the State
15 draws districts, indicating no stark divergence in technique
16 in the illustrative maps. It would be odd indeed if a
17 technique is innocuous when employed by the State but somehow
18 suspect when replicated by plaintiffs' expert.

19 At bottom, Mr. Morgan's dispute with elongation
20 appears to be based on the joining of Black and white voters
21 in the same district. But he fails to identify a single
22 traditional redistricting principle that demands racial
23 homogeneity across a single district.

24 At the end of the day, defendants' *Gingles* 1 argument
25 in Grant fails to credibly dispute that the Black population

1 in Metro Atlanta, in the Eastern Black Belt and the Western
2 Black Belt is large enough and geographically compact enough
3 to comprise majorities of eligible voters in additional
4 majority Black districts.

5 Turning to *Gingles* 2 and 3. This Court has already
6 ruled on and reaffirmed the proper legal standard under
7 *Gingles* 2 and 3. And indeed the parties have already
8 stipulated, as far as I'm concerned, to *Gingles* 2 and 3.

9 Stipulated fact 218: Black voters in Georgia are
10 extremely cohesive. That is *Gingles* 2.

11 Stipulated fact 222: White voters in Georgia are
12 highly cohesive in opposition to the Black preferred candidate
13 in the areas examined. That is part of *Gingles* 3.

14 And stipulated facts 225 and 226 show that white
15 preferred candidates consistently defeat Black preferred
16 candidates outside of majority Black districts.

17 These same stipulations hold true in the Grant case,
18 Your Honor, if you look at paragraphs 270 to 274.

19 *Gingles* 2 and 3 are thus beyond dispute.

20 So that brings us to the totality of the
21 circumstances. I'm going to briefly walk through each of the
22 Senate factors. And I'm going to try not to repeat a lot of
23 what Mr. Savitzky says, which I think is a good
24 characterization of a lot of the evidence in all of these
25 cases.

1 Senate Factor 1 is the history of voting-related
2 discrimination in the state. During opening statements
3 defendants echoed a familiar refrain, which is that the
4 history is long past. And to be sure, plaintiffs' experts
5 disagree, and we'll talk about that, Your Honor.

6 But I think it's notable that defendants have failed
7 to provide any expert on the totality of circumstances. Where
8 is the historian who will testify that the history books are
9 closed, or that Georgia's history of voting-related
10 discrimination ended in 1965 or 1990 or 2000 or 2010 or
11 whatever the State deems the cutoff to be?

12 One would think that if defendants' view of history
13 had an actual basis in the study of history, they would be
14 able to find a credible historian to say as much.

15 Senate Factor 2 is the extent of racially polarized
16 voting.

17 Now, during his opening statement, Mr. Tyson stated
18 on page 45, "The Court will have to answer the question of is
19 the polarization in Georgia best addressed by partisanship or
20 by race?"

21 But where is the case that says that the Court has to
22 answer that question? At the very least, as this Court has
23 already noted in its summary judgment order, there is no case
24 saying that plaintiffs must answer that question, either at
25 the *Gingles* phase or at the totality of circumstances phase.

1 And to the extent that defendants have even tried to
2 demonstrate that polarization in Georgia is better explained
3 by partisanship rather than race, they have fallen woefully
4 short.

5 Dr. Alford provided no new data or analysis
6 whatsoever in response to Dr. Palmer's report, just a
7 different inference based on the same data that plaintiffs'
8 expert used to establish *Gingles* 2 and 3.

9 To the extent that Dr. Palmer believes that primaries
10 are a critical part of the analysis, he certainly didn't
11 independently or affirmatively analyze primary data to try to
12 answer the question that he believes to be is so central to
13 the inquiry and that defendants keep asking of this Court.
14 Where is their effort to answer that question?

15 In any event, Dr. Alford testified today that his
16 opinion in these cases is limited to examining whether the
17 race of the candidate explains the observed polarization. He
18 offers no conclusions on the extent to which the race of the
19 voter explains the polarization. In fact, Dr. Alford admitted
20 that race probably does explain partisan preferences among
21 Georgia voters.

22 Even if plaintiffs did bear the burden on this point,
23 they have more than satisfied it. Dr. Burton testified in
24 detail to the ways in which the race of voters and issues
25 related to race have informed partisan affiliation throughout

1 Georgia's history and continue to do so today.

2 In other words, while defendants seek to waive away
3 the stark pattern of polarization as simply Black voters
4 voting for Democrats and white voters voting for Republicans,
5 in fact, Black and white voters in Georgia are voting for
6 their own interests related to race and the candidates that
7 they determine will best protect and represent those
8 interests.

9 Partisanship is not some randomly assigned trait or
10 some genetic characteristic. It is not an accident of birth
11 that we can just waive away as a race-neutral factor.
12 Partisanship in Georgia is a product of the issues that are
13 important to the voters and the candidates. And in Georgia
14 race is at the top of those issues.

15 Senate Factor 3, voting practices that tend to
16 enhance the opportunity for discrimination.

17 Dr. Burton testified that Georgia is the only state
18 that was formerly subject to Section 5 of the Voting Rights
19 Act to adopt all five traditional voting methods that have
20 historically had a discriminatory impact on minority voters.

21 Number 1, voter ID laws.

22 Number 2, proof of citizenship requirements.

23 Number 3, voter purges.

24 Number 4, cuts in early voting.

25 And, number 5, widespread polling place closures.

1 Let's just take one example from this list. Between
2 2012 and 2018 Georgia Secretary of State removed 1.4 million
3 voters from the eligible voter rolls. Those purged were
4 significantly overrepresented in precincts that overwhelmingly
5 voted for Stacey Abrams, the Black and the Black preferred
6 candidate in the 2018 gubernatorial race.

7 Dr. Jones echoed the pattern observed by Dr. Burton,
8 that Georgia has a habit of coming up with a new method of
9 Black voter suppression in the event that the previous methods
10 are either deemed unlawful or proved to be ineffective. She
11 noted that some 70 percent of the applications that failed
12 verification under the State's "exact match" procedures were
13 from Black voters.

14 She noted that Black voters are disproportionately
15 likely to receive voter challenges, to be on the other end of
16 a voter challenge; eerily similar to the challenges in the
17 past that often resulted in bodily violence.

18 And she noted that the 2020 election just
19 demonstrates that Black voters vote when the methods are
20 available for them to do so. And that in the wake of the
21 success of Black preferred candidates, the State of Georgia
22 once again restricted access to expansive voting methods.

23 Senate Factor 5, socioeconomic disparities that
24 hinder Black access to the franchise. Dr. Collingwood made
25 clear that Black Georgians are doing worse than white

1 Georgians across every single socioeconomic metric that he
2 examined. And he testified that the relationship between
3 socioeconomic status and voter participation is one of the
4 closest things to a hard-and-fast rule among experts in his
5 field.

6 Black voters continue to suffer the effects of
7 discrimination in education and in employment and in income
8 and in healthcare. And as long as they remain on the bottom
9 rungs, they will disproportionately face barriers in accessing
10 the franchise.

11 Senate Factor 6, racial appeals. Now, the evidence
12 here is stark. Defendants objected to much of that evidence
13 as inflammatory and prejudicial under Rule 403. But, Your
14 Honor, that is exactly the point. Images of a dark and
15 menacing Reverend Warnock, robocalls about the magical Negro,
16 are intended to inflame racial divisions among the electorate
17 and to feed on and fuel voters' racial prejudice.

18 Defendants argue those appeals have not been in
19 congressional or state legislative campaigns. But that is not
20 a prerequisite to Senate Factor 6 evidence. There is no such
21 qualifier in the Senate report on this factor.

22 Defendants also argue that those appeals have not
23 been successful presumably because Reverend Warnock has won.
24 But the level of racially polarized voting in the state
25 demonstrates that those appeals have likely done exactly what

1 they were intended to do: Persuade voters to vote along
2 racial lines.

3 Senate Factor 7, success of Black candidates. We've
4 already discussed some of that. Much of the success that we
5 have seen -- and, again, we are still a far cry from equal
6 opportunity, but much of the success that Black candidates
7 have seen at the polls is a function of the growth of the
8 Black population and cannot be attributed to the eradication
9 of racial discrimination.

10 Senate Factor 8, the responsiveness of elected
11 officials to minority concerns. This Court heard from
12 Dr. Diane Evans, a product of the Eastern Black Belt, a
13 pastor, a teacher, a longtime Jefferson County school
14 nutrition director and a businessowner.

15 Under plaintiffs' illustrative map she would reside
16 in Senate District 23. She would preach in Senate
17 District 23. And with her vast experience, both as a
18 candidate and an active participant in the political process,
19 she would teach her community to be politically engaged in
20 Senate District 23.

21 Her current representative, meanwhile, does not
22 return her phone calls when it comes to issues she is asking
23 about on behalf of her community.

24 This Court also heard from Fenika Miller, a lifelong
25 Houston resident who was called to action to run for her House

1 seat because she felt her representative was not addressing
2 issues important to her community.

3 Now, defendants have painted this picture of the
4 interests of these communities as really being abstract or
5 common to all voters. And Ms. Miller's testimony refutes that
6 assertion. Ms. Miller focuses on the tangible: Lack of
7 public transportation, sidewalks and streetlights, dilapidated
8 housing that needs lots of revitalization, inaccessible or
9 inadequate healthcare, food deserts in her community with only
10 one grocery store nearby, clean air and clean water.

11 Defendants are quick to assert that everybody wants
12 these things. And that is true. But it is the Black
13 communities and Black residents that are deprived of them.
14 It is her Black community that is deprived of them, that has
15 unequal access to these services and is being ignored.

16 The Court also heard from Gina Wright, the State's
17 primary map drawer for so many years. And she testified that
18 she heavily relies on legislators to represent and advocate
19 for their communities when drawing new district lines.

20 And by that logic, Your Honor, where certain
21 communities are not represented by their legislators, their
22 interests are less likely to be reflected in the new
23 redistricting plan or in any legislative policy.

24 And, lastly, Senate Factor 9, the State's purported
25 justification for drawing the district lines. The State has

1 made every effort to show that this map -- these maps, they're
2 all about politics. But plaintiffs don't dispute that it is
3 politically expedient for the State of Georgia to dilute the
4 Black vote. It was politically expedient to dilute the Black
5 vote in 1965.

6 Minority vote dilution does not need to be
7 accompanied by pitch forks and burning crosses and literacy
8 tests for it to result in minority vote dilution. The fact
9 that minority vote dilution achieves defendants' political
10 goals does not make it any more lawful.

11 I began by saying that it's been a long two weeks.
12 And I'm not going to lie, Your Honor. And not just in the way
13 that we are all physically and mentally exhausted from all of
14 the hard work over the past few weeks. And that includes the
15 Court staff, all of the lawyers and staff and, of course, the
16 Court's resources. I cannot thank everybody enough for the
17 long hours and the hard work.

18 But in addition to that level of exhaustion that
19 we're all experiencing, Your Honor, I am tired of trying to
20 parry and anticipate every new argument as the State ducks
21 and weaves to avoid the clear legal standard and the clear
22 implications of the Voting Rights Act, as it tries to do and
23 say anything and everything it can to avoid its Voting Rights
24 Act obligations.

25 Now, to be honest, Your Honor, when we started this

1 trial, I was dubious about what was even left to try given the
2 extensive preliminary injunction record and the now undeniable
3 legal precedent governing these cases.

4 And two weeks later I have seen the State's effort to
5 pull at this thread or try this angle or throw this argument
6 at the wall in case it sticks. And I have found it not only
7 baffling, but at times outright galling.

8 I am tired, Your Honor, and I am just a lawyer
9 standing up in this court over the last two weeks to present
10 the evidence. I can only imagine how tired the Black voters
11 of Georgia must be to have lived this evidence day in and day
12 out.

13 I'm sure Diane Evans is tired of teaching and
14 preaching to advance the interests of her community only to
15 have her representatives not return her calls.

16 I'm sure that Fenika Miller is tired, after
17 representing an organization called Black Voters Matter in the
18 Black Belt, only to hear the State's map drawer testify on the
19 stand that she does not recognize the Black Belt as a
20 community at all.

21 But the truly remarkable part, Your Honor, is as
22 tired as those individuals must be, they are tireless when it
23 comes to their willingness to fight for their right to vote on
24 equal footing.

25 Dr. Evans and Ms. Miller and Reverend Pendergrass and

1 Ms. Grant and so many others are continuing their lifelong
2 struggle in this courtroom, not because they're looking for a
3 free pass, but because what they want is what they're entitled
4 to, which is a fair chance.

5 Your Honor, plaintiffs are prepared to continue this
6 fight to ensure that not another election goes by based on
7 unlawful maps and to try to stave off the State's ever
8 morphing and ever ingenious ways of diluting minority voting
9 strength.

10 We respectfully request that the Court enjoin the
11 enacted congressional and state legislative maps as violations
12 of Section 2 of the Voting Rights Act.

13 THE COURT: Thank you, Ms. Khanna.

14 We'll take a ten-minute break. And at 3:50 we'll
15 start the State's argument.

16 MS. KHANNA: And, Your Honor, I forgot to reserve
17 five minutes.

18 THE DEPUTY CLERK: You have 20.

19 MS. KHANNA: Oh, even better.

20 THE COURT: You have plenty.

21 (After a recess, the proceedings continued at
22 3:50 p.m. as follows:)

23 THE COURT: You-all may be seated.

24 I'm ready whenever you are, Mr. Tyson.

25 MR. TYSON: Thank you, Your Honor.

1 Your Honor, we've come to the end, or almost to the
2 end, of our journey in this redistricting case. And I know
3 everyone's glad for that, as Ms. Khanna eluded to.

4 I also think, if nothing else, this trial has made
5 clear why it's difficult to give legal advice to a
6 jurisdiction about how to comply with Section 2 at times.

7 But we submit here, Your Honor, that the evidence
8 that you have before you shows that Georgia's voting system is
9 equally open to all voters, making this Section 2 case a much
10 easier one than the average Section 2 case.

11 So I want to begin today with *Allen*. The US Supreme
12 Court has reminded us that the things we've been discussing
13 for the last ten days are primarily the duty and
14 responsibility of the states, not federal courts.

15 And the purpose of why we conduct this inquiry from
16 *Gingles* is to limit judicial intervention to those situations
17 where there's intensive racial politics; the excessive role of
18 race is denying minority voters the equal opportunity to
19 participate.

20 And so as we come to the issues in the case, I think
21 it's important to remember the role of this Court in this
22 process of evaluating what happened here.

23 And so I'm going to walk through the same checklist
24 everybody else has on the issues. But I think it's worth
25 remembering that the question ultimately all these different

1 factors are trying to help us answer the question of, is
2 voting equally open in Georgia? Are these redistricting plans
3 causing dilution of minority votes?

4 And I think that, as we'll discuss, the facts here
5 are dramatically different than the facts in Alabama that were
6 in front of the Court in *Milligan*.

7 So we've looked at the text of Section 2 a bunch of
8 times. We all know what it says. But I think it's important
9 to begin that this is an obligation on governments. This is
10 what states should not do. This is the obligation a state has
11 to follow the law.

12 And the goal of Section 2 is not to set a ceiling.
13 It's not to set a requirement of proportional representation.
14 It's to ensure equality of opportunity.

15 And the reason why we talk about proportionality, the
16 reason why we talk about equal opportunity is once you get to
17 the point where the political processes are equally open, it's
18 like Dr. Alford said today, then it's just party politics and
19 everybody makes their best case to the voters, the voters vote
20 how they're going to vote, and then the winner comes out on
21 top and we move forward.

22 So in considering where we are, the goal isn't to
23 ensure an outcome; the goal is to ensure opportunity. And we
24 have opportunity. We're going to see politics continue,
25 that's how our system is designed to work, but what we won't

1 see is discrimination or dilution on account of race or color.

2 Also looking back at *LULAC*, just to remind you about
3 the purpose of the Voting Rights Act, the goal is to get to a
4 point where we're no longer as a society fixated on race. And
5 as difficult as these last ten days have been talking about
6 that, keeping that goal in mind I think is important as well,
7 that our purpose here, what we want to get to as a society
8 that's not fixated on race, we can all make our political
9 cases and move forward as we go from here.

10 And I think the challenge as someone representing the
11 government officials here is this obligation of Section 2
12 applies to the legislature and how it drew the maps. And
13 where is the endpoint in terms of what Section 2 requires to
14 get us to equal opportunity is an important question for
15 helping the officials who have to follow this law know what
16 they're supposed to do.

17 And so does it mean -- I think under the plaintiffs'
18 view the legislature must just keep drawing more and more
19 majority Black districts if they're capable to be drawn on the
20 map until, Mr. Savitzky said, we reach some point where
21 racially polarized voting disappears. On the current
22 situation, the only way I know that racial polarized voting
23 can disappear is if white voters start voting for Democrats or
24 Black voters start voting for Republicans.

25 And so in terms of -- we kind of keep coming back to

1 partisanship as we try to sort through what has happened here.
2 And ultimately if this Court is going to find that there is
3 some violation of Section 2 on these redistricting plans, the
4 legislature will need to know, is it supposed to draw the 19
5 majority Black State Senate districts that Mr. Cooper drew on
6 his preliminary injunction State Senate plan?

7 Is it the 17 the plaintiffs are proposing now?

8 Is it the 18 Mr. Cooper actually drew on his
9 illustrative plan in Alpha?

10 The parameters and the instructions around what the
11 government is supposed to do to comply with Section 2 is going
12 to be a critical part of this Court's order in order for it to
13 find for the plaintiffs. And we submit that's not how you
14 should find, obviously.

15 But the key point is we're trying to get to a place
16 where there's not this fixation on race as a result of the
17 Voting Rights Act. We want to be at the place where everyone
18 can have equal opportunity and make their political case, and
19 whoever wins, wins. That's what we want to see as everyone
20 participates.

21 So at the risk of breaking every PowerPoint rule, I'm
22 putting a lot of words on the screen.

23 I just wanted to contrast -- Ms. Khanna talked about
24 it felt like at times we were trying two different cases. And
25 I think part of that is just the way each of us approach

1 Section 2. Plaintiffs will talk about intensely local
2 appraisals, but then their evidentiary proof ends up looking
3 more like a checklist.

4 For *Gingles* 1, the only question is, can we draw a
5 new majority Black district? Are its compactness scores
6 similar to the enacted plan? And if that's the case, check,
7 we can move on from *Gingles* 1.

8 From the State's side, we believe the precedent says
9 you have to look at whether the maps that the plaintiffs have
10 proposed are remedies the Court can enter under 11th Circuit
11 precedent. And you've talked about in your summary judgment
12 order, are the maps something the legislature can implement?
13 Is this racially predominant maps or is this racially
14 conscious maps? So there's an inquiry that has to happen on
15 *Gingles* 1 beyond just a checklist.

16 Likewise, with *Gingles* 2 and 3, the plaintiffs' view
17 and this Court's order on summary judgment, basically do Black
18 and white voters prefer different candidates? We submit there
19 needs to be a deeper analysis there and/or at the Senate
20 Factor 2. And so I'll talk today primarily about *Gingles* --
21 about the partisan racial issues in Senate Factor 2 based on
22 this Court's orders.

23 So let's jump in and discuss what the Court's heard
24 about the *Gingles* preconditions. So I want to start with
25 Alpha on *Gingles* 1.

1 And as we go towards this, I think it's a reminder to
2 go back to what the Supreme Court told us in *Bethune-Hill*,
3 that race can predominate even when a reapportionment plan
4 respects traditional principles. And the reason why is if the
5 race was the criterion, then the State's view or map drawer's
6 view could not be compromised and race-neutral considerations
7 came into play only after the race-based decision had been
8 made. That's racial predominance in that scenario.

9 Likewise, a map drawer can't assume that a group of
10 voters is going to think alike, share the same political
11 interests, prefer the same candidates based merely on the
12 color of their skin.

13 And so what do Mr. Cooper's maps in Alpha show us?

14 First of all, we have Mr. Cooper testifying that he
15 relied on the shared experience of all Black voters. In other
16 words, doing what *LULAC* said you can't do as a -- when you're
17 a map drawer drawing redistricting plans. He turned on racial
18 dots and talked about how every precinct with greater than
19 30 percent Black population had a dot on it so he could
20 identify areas that he wanted to consider as he looked for new
21 majority Black districts.

22 He made racial splits of counties. And we showed
23 that through the evidence, that he consistently sorted people
24 into districts based on their racial makeup.

25 And all the various justifications Mr. Cooper

1 proposed came after he finished the plans. He went and looked
2 at socioeconomic data after he finished drawing. He went and
3 found the corridor management plan after he finished drawing.
4 He didn't look at public comments first. He looked and
5 checked his various splits on regional commissions, things
6 like that.

7 He didn't follow a consistent process, either, for
8 splitting and unsplitting counties. Didn't follow a
9 consistent process for whether he was following municipal
10 boundaries, county commission boundaries.

11 Ultimately, the only consistent process Mr. Cooper
12 followed was creating districts in such a way that he could
13 add majority Black districts and splitting counties to get
14 there, splitting precincts to get there, whatever was
15 necessary to create these plans.

16 Mr. Cooper also used what he called the ripple effect
17 as kind of both a sword and a shield. It was -- it explained
18 the difference in the enacted plans, there was a ripple effect
19 out to different places. But also he didn't want us to look
20 or didn't look at any districts that were not majority Black
21 districts that he had changed when it was necessary to see
22 what happened around the new majority Black districts to
23 understand the design.

24 And, ultimately, he's also someone coming after the
25 State drew its plans. So in some ways he's also able to teach

1 to the test. He knows what the mean compactness score is on
2 the State plan before he starts drawing. He knows the number
3 of majority Black districts. He knows the number of split
4 counties. And so he's an experienced map drawer who can
5 create a plan that matches those metrics as well.

6 And as we discussed and looked at, Mr. Cooper made
7 great efforts to mask his efforts to make the top line numbers
8 look the same. So we have splits of counties that could not
9 be ripple effect and could not be related to changes, like
10 Gordon County.

11 And at some point Mr. Cooper's repeated insistences
12 that race did not predominate in the drawing of his plan give
13 way to the only consistent feature of his county splits, the
14 only consistent feature of his precinct splits, was working
15 towards that racial target in the districts that he had.

16 And Mr. Morgan talked about some different techniques
17 that were involved in Mr. Cooper's various plans. Techniques
18 like connecting more Black voters with more rural white
19 voters, there was a specific process there. Techniques like
20 removing heavily white voters from Peachtree City in order to
21 create a new majority Black district.

22 These kind of stretches and elongating of districts
23 made it possible to lower the Black percentage and free up
24 votes in other areas. Or Mr. Cooper added county splits all
25 around District 133 in order to achieve the goal of making

1 that a new majority Black district.

2 The House plan in East Georgia cuts a variety of
3 counties. Mr. Morgan said, I believe Mr. Cooper did as well,
4 this is the most county splits of any district in District 128
5 that was designed to help free up the Black population to
6 create new House District 133. And ultimately what we see is
7 the consistent pattern of racial sorting in Mr. Cooper's
8 plans.

9 District 17 on the Senate is elongated. District 23
10 on the Senate is designed to gather disparate Black
11 populations all around the East Georgia area. It makes racial
12 splits.

13 The House plan, we see elongation of districts in 74
14 and 117. In District 145 he divides the Black community in
15 Macon into multiple districts. And in District 171 he splits
16 counties and precincts along racial lines and gathers
17 disparate Black populations into a single district.

18 So yesterday Your Honor had some questions about
19 Mr. Morgan's so-called race-blind map. And I want to discuss
20 that a little more here because I think it helps frame what
21 the Court has to evaluate.

22 This is not -- to be very clear, this is not the
23 Alabama proposed race-neutral benchmark that they tried to use
24 in their case. That's not the same thing here. But in
25 helping the Court find the line between what's race

1 consciousness and what's race predominance, this is a helpful
2 analytical tool. And here's why.

3 If you look at, for example, Mr. Morgan's race-blind
4 plan in the Metro Atlanta area, you see compact, relatively
5 normal-looking districts that are designed in the area. And
6 we saw some of those had extremely high Black populations
7 based on the way they were configured. I think District 55
8 was well over 90 percent.

9 When you move to the enacted plan, you see elongation
10 of districts. Ms. Khanna referenced this. This is an element
11 of the State's plan. These districts, as Mr. Esselstyn and
12 Mr. Cooper both testified, if you elongate a district, you can
13 lower the overall Black percentage and create additional
14 districts. That's part of the design.

15 But then when you go to the illustrative plan, now
16 you see a splitting up of communities in Clayton. You see
17 further lengthening of districts that run even longer, from
18 farther north to farther south, that then enable the creation
19 of the districts that are drawn.

20 So from our perspective, Your Honor, the General
21 Assembly plan is a race-conscious plan. The legislature
22 clearly made changes to address compliance with Section 2.

23 But then, as you heard from Ms. Wright, there's an
24 explanation for each of these districts as well. This is not
25 race alone driving the configuration. This is race as a

1 consideration.

2 So, ultimately, Your Honor, when you get to
3 Mr. Cooper's plan, though, you don't have explanations for
4 many of these districts beyond, well, I thought they had
5 something in common, I thought there was a reason to do this.

6 So in our view, the line between race predominance
7 and race consciousness runs right here between these plans.
8 When Ms. Wright can explain the basis for the districts, you
9 can see efforts to comply with Section 2 versus a map drawer
10 who is focused on race and racial goals using the techniques
11 Mr. Morgan describes to achieve a racial goal; that's when we
12 cross from a district that is race conscious to race
13 predominant. And we're in the world that the *Bethune-Hill*
14 court talked about of even if you can point to some
15 traditional principles of redistricting, you still have a map
16 drawer who is pursuing race as the one thing that cannot be
17 compromised on a plan.

18 We have a similar design or issue on the House plan.
19 And not to belabor this point, but to get from the enacted
20 plan in its District 69, here in pink, to Mr. Cooper's 74 that
21 is a new majority Black district, you have to elongate both 69
22 and 77 to get there and use the Black population in the north
23 part of these districts, as the maps attached to Mr. Morgan's
24 report demonstrate. That's what's necessary to enable
25 District 74 as a new majority Black district.

1 So, ultimately, Your Honor, we would submit that the
2 maps that are in existence for Mr. Morgan's plans in Alpha Phi
3 Alpha demonstrate the type of race predominance that makes
4 them inappropriate as *Gingles* 1 remedies based on the evidence
5 before you.

6 Moving to Mr. Esselstyn's plans on *Gingles* 1 as well,
7 I want to talk through those. And, again, same quote from
8 *Bethune-Hill*, we have an issue in terms of whether race
9 predominates. Traditional districting principles don't
10 necessarily tell us the answer.

11 Mr. Esselstyn, a little bit different, though, in
12 some ways. He didn't have as many explanations for why he
13 drew what he drew. His direct testimony was much more, I
14 can create this district. I don't have a reason why I'm
15 connecting certain parts of the district with another part of
16 the district; it's just something I drew along the way.

17 He didn't have familiarity with communities of
18 interest in Georgia beyond what he could see on the census.
19 And ultimately wasn't taking anything into account that the
20 legislature would have taken into account, aside from some
21 things that he could see that were visible on his plan.

22 Mr. Esselstyn has some of the same techniques we've
23 discussed on the Cooper plan. District 28 strikes out and
24 elongates for more heavily Black areas in the north part to
25 more heavily white areas in the south part, even when Coweta

1 County is one of the largest counties in this district.

2 Mr. Esselstyn's District 23, every cut it makes of a
3 county is racial in nature. He always includes more Black
4 population in District 23 and always excludes more heavily
5 white population.

6 And the Senate District 25 that was created was only
7 enabled by the creation of Senate District 10 that Mr. Morgan
8 discussed in his report, elongating a district all the way
9 from Stonecrest down to Butts County.

10 On the House plan we see similar patterns.
11 Mr. Morgan talked about the additional technique of racial
12 sensitivity, that you have all these districts so close to
13 50 percent in Macon, that every move you make necessarily has
14 to be not only race conscious, but race has to be the thing
15 that sets off the alarm bell, like the astronauts in Apollo
16 13, to know what's happening.

17 In addition to these districts, Mr. Esselstyn's plans
18 elongate districts radiating out for more heavily Black areas
19 in District 64, in 74, in 117 and Metro Atlanta.

20 Your Honor, the only consistent feature of these
21 plans is trying to get to the creation of 50 percent plus
22 Black districts. And we would submit that, again, like
23 Mr. Morgan's plans, the lengthening of and elongation of
24 districts is again demonstrated in 34, in 10. That frees up
25 population to create District 25.

1 And on the House, the same concept of elongating
2 districts in Fayette County to gain more access to Clayton
3 County as was testified in the various proceedings.

4 Race consciousness is okay. Race consciousness is
5 what the legislature did. Race predominance is existent on
6 the Grant plans that are submitted here because the map
7 drawer's one thing he couldn't compromise was race in the
8 drawing of these district plans, even if he can point to some
9 traditional districting principles.

10 I'll move to the Pendergrass case next on *Gingles* 1.
11 And I'll give a point of agreement here with Ms. Khanna, the
12 evidence is different on Pendergrass than it is in Grant and
13 Alpha Phi Alpha.

14 Mr. Morgan didn't opine about race prioritization.
15 The challenges were, though, Mr. Cooper couldn't identify
16 where the geographically compact Black community was in
17 District 6. Most of the Black voters, as we looked at in
18 those various maps, were already in majority Black District 13
19 as we're considering this.

20 This district, as drawn, as Mr. Cooper's testimony
21 indicated, is only 1,300 people above majority. That's how
22 tight the goal is in terms of creating this district as a
23 majority Black district.

24 And as I understand their claims, and I'm sure
25 Ms. Khanna will correct me if I'm wrong on this in her

1 rebuttal, I don't understand the plaintiffs are necessarily
2 claiming District 13 as a packed district. This was primarily
3 District 13 previously, a lot of the geography. And if it was
4 not -- District 13 was not packed, then what is the necessity
5 of the creation of District 6 in this area as a remedy for the
6 Voting Rights Act?

7 So with that, Your Honor, let me move -- oh, I'm
8 sorry, one other point here.

9 Only the Fulton County portion we pointed out is
10 majority Black, which goes to where is the geographically
11 compact Black community?

12 In terms of the politics versus race questions that
13 you have to get into, either *Gingles* 2 or 3 or on the
14 totality, both Mr. Savitzky and Ms. Khanna are right, *League*
15 *of Women Voters* is an intentional discrimination case, but the
16 case that's cited for that proposition is the *Bertovich* case,
17 which was a Section 2 case. And, yes, it was part of the
18 *Bertovich* opinion related to intentional discrimination.
19 There were kind of two pieces to that case. But I think it's
20 important to remember where we are in terms of the role of the
21 court.

22 The Supreme Court told us in *Rucho* that federal
23 courts can't vindicate generalized partisan preferences.
24 That's why they said that there was no jurisdiction over
25 partisan gerrymandering in federal court, because ultimately

1 as *De Grandy* says, minority voters are not exempt or immune
2 from their obligations to, as they put it, pull, haul and
3 trade to find common political ground.

4 This takes us back to the question of equal openness
5 as we work through this process because ultimately we want
6 this to be about politics. We don't want it to be about race.
7 The idea behind the Voting Rights Act is we move beyond the
8 element of the world where everything is such a focus on race,
9 as the Court said, and get to a place where everyone can
10 participate politically on an equal basis.

11 So let me get to -- skip ahead a little bit here,
12 Your Honor, to the totality, because I think this is where
13 most of our time is spent and the Court's efforts will be
14 moving forward.

15 We, of course, believe that we win on the *Gingles*
16 preconditions alone, that you can rule in our favor based on
17 that. But if the plaintiffs have met those *Gingles*
18 preconditions, the Court moves to the totality. And this is
19 where the facts of each case are the key part, the intensely
20 local appraisal of the design, all the reasons why you, as a
21 district court judge, can sit here and dig into the questions
22 of fact that can't be addressed otherwise.

23 You're not limited to the Senate factors, they're a
24 starting point, but it's part of the process. No requirement
25 that there's any particular factors be proved, but, again, all

1 of this goes to equal openness.

2 So let's talk about the factors.

3 Plaintiffs have, again, when it comes to the
4 totality, a checklist approach. I'm not going to read the
5 whole slide here, but essentially from the plaintiffs'
6 argument, we go down the list.

7 Do we have a history of discrimination? Yes, we do.

8 Do we have Black and white voters preferring
9 different candidates? Yes, we do.

10 And they work down the checklist. And that's the end
11 of the analysis at that point.

12 But what the Section 2 and the cases require is this
13 intensely local appraisal, looking behind the system to
14 understand what's happening with the electoral system and its
15 design.

16 So that begins with the history of discrimination.
17 And I believe this Court referenced whether racial
18 discrimination permeates Georgia's election fabric.

19 The testimony before Your Honor and the testimony
20 from the deposition designations is that you don't have people
21 who are unable to vote before you or have had that experience.
22 Mr. Germany's testimony is voting is easy in Georgia,
23 regardless of race.

24 There's been a lot of references to Senate Bill 202
25 being a continuation of historical practices. And in some

1 ways, I -- as counsel for the State in the Senate Bill
2 202 cases, I feel a little bit like we're having a mini trial
3 of Senate Bill 202.

4 But I would just point out for the Court that
5 currently before Judge Boulee is plaintiffs' motion on
6 intentional racial discrimination on a preliminary injunction
7 is pending. We might have a hearing a week from tomorrow on
8 that.

9 The plaintiffs' brief and exhibits on that
10 preliminary injunction were over 3,000 pages of material. And
11 as the State's counsel, we obviously think there's no merit to
12 that claim. We're going to litigate that with Judge Boulee on
13 those questions.

14 But we would submit the plaintiffs can't just kind of
15 throw Senate Bill 202 out as here is something we disagree
16 with about election administration and say, ah-ha, we've found
17 a connection to the historical practices. Something more than
18 that is required. And we would submit that that burden has
19 not been met by the historians that have testified in this
20 case.

21 Mr. Germany has provided context for many of the
22 changes in Senate Bill 202, context of what happened in 2020,
23 complaints that were received, reasons why drop boxes were
24 changed. The Court, again, can't presume some sort of racial
25 impact based on that.

1 And the plaintiffs haven't connected the -- any of
2 these practices necessarily to redistricting. We have a bunch
3 of discussion of history, but there's also specific maps that
4 are being challenged. The allegation isn't but for this
5 particular election practice Black voters could succeed,
6 whether that's drop boxes or anything else. This case is
7 about particular maps.

8 We move to the second Senate factor in race and
9 politics. And ultimately what the plaintiffs' evidence shows
10 is that regardless of year, regardless of candidate,
11 regardless of office, Black voters prefer Democrats and white
12 voters vote for Republicans.

13 And I'll go back to the *Solomon County* decision
14 because I think it's important to remember that the 11th
15 Circuit recognized that it's entirely possible that bloc
16 voting, as defined by *Gingles*, could exist, but that such
17 bloc voting would not result in a diminution of minority
18 opportunity to participate in the political process.

19 And what matters for the Court's analysis is the
20 evidence the plaintiffs have actually presented.

21 Dr. Alford testified that the statistical sheet from
22 Dr. Palmer indicated a resounding success of the Voting Rights
23 Act; that you no longer saw the race of a candidate playing a
24 role in the decisions of voters.

25 As Dr. Alford pointed out, the data clearly indicates

1 that the race of the candidate is not affecting behavior of
2 Black voters, it's not affecting the behavior of white voters.
3 Both Dr. Palmer and Dr. Handley carefully avoided elections
4 that would have led into this analysis.

5 The race of the candidate demonstrates that race
6 doesn't enter into the calculation of the electorate based on
7 the evidence the plaintiffs have put before the Court. And we
8 know that because the pattern of bloc voting is incredibly
9 stable.

10 As Dr. Alford explained, if a Democrat is on the
11 ballot, Black voters are going to vote for the Democrat with
12 remarkable stability; white voters vote for the Republican
13 with remarkable stability.

14 And, importantly, white voters don't alter their
15 voting behavior simply because the Black preferred candidate
16 is Black themselves or has identified with the interests of
17 the Black community.

18 And that's a key distinction from how we used to see
19 these voting patterns, as Dr. Alford testified today. That
20 the Georgia of today, in terms of voting patterns, is
21 different than the Georgia of the past when white voters would
22 change the candidates they supported if that candidate was a
23 racial minority or is identified with a Black community in an
24 election.

25 And as Dr. Handley's primary analysis revealed in

1 Alpha, if the white preferred candidate in the Democratic
2 primary loses the election in the primary, the white voters
3 don't stay home or gravitate toward another political party.
4 They consistently vote for the Black preferred candidate in
5 the general election.

6 And in Republican primaries, the evidence from
7 Dr. Alford shows that white voters are willing to vote for
8 Black candidates even over longtime elected officials like
9 Commissioner Gary Black.

10 What the evidence doesn't show is that white voters
11 are unwilling to support the Black preferred candidate if the
12 Black preferred candidate were somehow to be a Republican in a
13 situation. We don't see that, though, because, again, these
14 are partisan voting patterns.

15 So at this point the record before this Court has no
16 evidence of legally significant racially polarized voting.
17 And while the 11th Circuit in *Marengo County* said that
18 racially polarized voting is the surest indication of
19 race-conscious politics, that's only true if you're evaluating
20 the polarization correctly. And we would submit that here
21 this indicates party-conscious politics, not race-conscious
22 politics.

23 On Senate Factor 3, voting practices, this is where
24 *Gingles* is showing its age a little bit, because it identifies
25 specific practices that, at least in Georgia, led to the

1 election of, for example, Senator Ossoff as a result of the
2 majority vote requirement.

3 There's, again, pointing to Senate Bill 202, I won't
4 go back to that again.

5 What we see in Georgia, though, is increases in early
6 voting in Senate Bill 202, which is what Mr. Germany testified
7 to. A 98 percent registration rate of eligible individuals,
8 Mr. Germany said.

9 And then the other issues raised by the plaintiffs
10 are largely issues that have been considered in this court in
11 *Fair Fight*. You've looked at the issue of list maintenance
12 and whether that violated the law. You've looked at "exact
13 match" and active MIDR and all the pieces that go with that in
14 Section 2 case.

15 And so ultimately plaintiffs can't rely on practices
16 like that to show discriminatory effects on Georgia voters
17 because those practices are not discriminatory at the end of
18 the day.

19 On the fifth factor of socioeconomic disparities, the
20 Court talked about the status of minority life in Georgia is
21 what this one largely speaks to. Turnout gaps can disappear
22 at times, the plaintiffs' evidence shows that, when there's
23 particular candidates who motivate turnout.

24 Dr. Burch 's evidence shows that Black voters in most
25 educational levels outvote white voters at the same

1 educational levels.

2 And ultimately there's no disparate behavior of
3 Black and white voters. People tend to turn out more in
4 presidential years, less in midterm election years. We don't
5 see, even in turnout gaps, any barriers to voting that come
6 from that.

7 And we recognize the 11th Circuit precedent on this
8 Senate factor says that you assume causation from the
9 disparity. But we think that the turnout that's been
10 demonstrated for the Court means that this has very little
11 weight because it generally only shows the status of minority
12 life in Georgia. It doesn't bear directly ultimately on the
13 ability to succeed in the challenged elections.

14 When we talk about the racial appeals, the question
15 is are campaigns characterized by racial appeals? Because,
16 again, as *Allen* said, we're looking for the excessive role of
17 race in the electoral process that denies an opportunity.

18 And, interestingly enough, when *Gingles* was first
19 decided, a lot of times a racial appeal was putting a picture
20 of a candidate on campaign material so voters would know the
21 race of the candidate. Today, I don't think anyone in Georgia
22 didn't know that Senator Warnock and Herschel Walker were both
23 Black men. That's a difference in our politics today.

24 And so the plaintiffs have talked about things like
25 the fake Oprah phone call that the evidence shows originated

1 outside Georgia, went to fewer than a thousand people.

2 We have Senator Warnock running statewide and
3 succeeding.

4 And we also have evidence plaintiffs put in the
5 record of at least claims by a Republican candidate that
6 Democrats were making racial appeals. The ad from Mr. Walker
7 claimed that the Democratic party were the ones making racial
8 appeals to Black voters. So, again, we keep kind of circling
9 back to partisanship as we work through the totality of the
10 circumstances.

11 And ultimately I think the issue of are the appeals
12 in congressional races, are the appeals in the legislative
13 races goes more to the weight at least, because even if there
14 are examples of racial appeals in an election system, that
15 doesn't mean the system is characterized by those appeals.
16 And if those appeals aren't for the offices that are being
17 challenged in the case, they would bear very little weight
18 overall in the Court's analysis.

19 On the extent of election of Black officials, Senate
20 Factor 7, the Senate factors change from Black preferred
21 candidates to Black candidates or minority candidates.
22 And what we see is success of Black and Black preferred
23 candidates.

24 We heard from Mr. Allen who testified that he was
25 elected from a non-majority Black district. He ran for

1 lieutenant governor on a statewide basis because he thought he
2 could win. There's not an example here of lack of success
3 overall.

4 Black candidates and Democratic candidates like
5 Mr. Carter run statewide. And if Black and Black-preferred
6 candidates are winning, then don't we have a system that is
7 equally open to participation by all voters?

8 On Senate Factor 8, the responsiveness to
9 particularized needs, you haven't heard needs that are
10 necessarily attuned to the offices that are being challenged.
11 So there was some discussion about Ms. Miller talking about
12 sidewalks and streetlights. We have a challenge on a
13 legislative plan and there's been no evidence that the
14 legislature bears some role in things like that.

15 On issues for food deserts, clean air, public
16 transportation, those are issues that are shared by voters in
17 large areas. Traditionally, this responsiveness to needs was
18 rooted in a place. I remember in our Fayette County case
19 years ago there was a Black community in North Fayette that
20 wanted a park built in the northern part of Fayette County
21 where the Black community was. And part of the
22 lack-of-responsiveness evidence was the at-large elected
23 officials weren't responsive to building the park at that
24 location. It was primarily an area of Black voters.

25 What we have here is situations where we have non --

1 or partisan issues that are raised as an example of
2 responsiveness, whether that's the NAACP report card on
3 Justice Gorsuch's nomination being an example of lack of
4 responsiveness or issues that are widely shared by voters in
5 a similar socioeconomic place.

6 Let me go to the justification for the policy.

7 I think it's worth remembering that *Bush v. Vera* says
8 that states have a lot of flexibility for avoiding Section 2
9 liability in the creation of their plans.

10 And Ms. Wright's testimony shows the communities of
11 interest, the cities, the political considerations that went
12 into the enacted districts. They were the result of a
13 thoughtful and deliberative process. There was input from
14 Republicans. There was input from Democrats.

15 And while you see partisan or heard about partisan
16 goals as part of that process, you can also see an effort to
17 comply with Section 2. Districts are elongated on the enacted
18 plans and that they're not put -- what you did not have,
19 though, is other pieces and techniques used by the plaintiffs.

20 So you didn't see examples of the enacted plans
21 bypassing white population, cutting counties in a racially-
22 sorted way to achieve a particular goal, or these extremely
23 close to 50 percent Black VAP districts.

24 And Ms. Khanna argues, well, it's the State's
25 interest to go ahead and dilute the votes of Black voters

1 because there's a partisan benefit to that. But we're then,
2 again, back to how do we disentangle race and partisanship?
3 What do we do because we can't presume race when partisanship
4 is an explanation?

5 And, ultimately, Your Honor, does Section 2 require
6 longer, thinner, more-striped districts to achieve the
7 particular racial target? Does it require cutting more
8 counties? Does it require increasing deviations to achieve
9 its goals as the plaintiffs' plans have proposed?

10 And ultimately that's the challenge we would submit
11 of finding for the plaintiffs in this case is there's not a
12 limiting principle for how far the State must go up to
13 proportionality. And we know proportionality can't be the
14 answer.

15 So speaking of proportionality, let's end on that
16 piece of the puzzle.

17 To be clear, we're not arguing that proportionality
18 is a safe harbor. The Supreme Court in *De Grandy* said it's
19 not. But I think the Court has to consider how we evaluate
20 the success of Black candidates and Black preferred
21 candidates. Do we only look at majority Black districts to
22 determine proportionality, which goes directly to equal
23 openness? Do we look at the election of Black preferred
24 elected officials? If race and party truly can't be
25 disentangled, as the plaintiffs' evidence shows, then how is

1 every Democratic member of the legislature, regardless of the
2 district they're elected from, not a Black preferred
3 candidate?

4 Ms. Khanna talked about a variety of other racial
5 minorities, but in this case we're talking specifically about
6 the plaintiffs' claim that Black voters' votes were diluted.
7 And so if Black voters' preferred candidates are succeeding
8 even in areas where there is less than 50 percent Black
9 population and Democrats are being elected, how do we not have
10 an equally open system for purposes of proportionality?

11 Now, there was a reference this week -- we talked
12 about the members of Congress. And there was a reference to,
13 well, we can't count Congresswoman McBath's district because
14 it's 29.8 percent Black, but it's also majority non-white.

15 Mr. Cooper's own numbers, if you go back to the
16 district that Congresswoman McBath won originally, the
17 benchmark plan District 6, with the 2020 census numbers
18 applied, it was a 55.58 percent non-Hispanic white district.
19 That's the district that Congresswoman McBath won in 2018 when
20 she beat an incumbent congresswoman for that job. And so in
21 terms of evaluating political success, again, that district
22 was trending democratic even though the overall racial numbers
23 had not changed.

24 And so ultimately, Your Honor, what all these
25 different factors show is that if you're a good candidate in

1 Georgia, you can go and get elected in districts. You can go
2 get elected statewide.

3 I included this slide in my opening, just walking
4 through the various pieces of success of different officials
5 at different levels. And I think, again, that it just goes to
6 the question of if race and party are inseparable, how is the
7 widespread success of Democratic candidates not counted for
8 equal openness in support of Black voters in this case?

9 So let me move to *De Grandy* for us to close out
10 today. This is a case that is about more success in place of
11 some success. That's what we're here to talk about. And we
12 have to look not only at the *Gingles* factors, but this Court
13 must treat equal political opportunity as the focus the
14 Supreme Court has told us.

15 And I think this is where we get into the difficult
16 place of what Section 2 means.

17 *Abbott v. Perez* tells us that the Constitution
18 restricts consideration of race. The Voting Rights Act
19 demands consideration of race. And so when the Supreme Court
20 was faced with a situation where there was a requirement to
21 consider a race-based remedy, in the *Harvard* case it found
22 there must be an endpoint to that.

23 Justice Kavanaugh in the *Allen* case said, "The
24 authority to conduct race-based redistricting cannot extend
25 indefinitely into the future."

1 And *Gingles*, properly interpreted, avoids this
2 concern completely, because if the facts on the ground in
3 Georgia indicate equal openness under the *Gingles* test, and
4 we submit they do, we don't run into a conflict between the
5 Constitution and the Voting Rights Act because ultimately
6 race-based remedies would not be required. We'd be to the
7 world of everyone play party politics. And we're not
8 expecting rainbows to descend and angels to come down and
9 everyone to hold hands and agree. What we are expecting is a
10 system where everybody makes their case to the voters and
11 people vote for who they want to vote for.

12 When voters are able to vote for candidates based on
13 their interests and on what they want, that to see in the
14 election -- I mean, in the government, that's an equally open
15 political system.

16 But, Your Honor, if ultimately we're in a situation
17 where the facts in Georgia do not demonstrate equal openness,
18 now *Gingles* is running headlong into the Constitution's
19 prohibitions on race-based remedies.

20 Mr. Savitzky said we'll know we reach the end when
21 racial polarization is not happening anymore in voting. But
22 that will only happen if Republicans start voting for
23 Democrats or Black voters -- and Democrats start voting for
24 Republicans. We can't have this -- we can't have a political
25 remedy under the Voting Rights Act.

1 And that's the concern we have here, that if the
2 Court finds liability for Georgia on these facts, they are
3 endangering Section 2 of the Voting Rights Act in places where
4 it's still needed, in places like Alabama, maybe, that has
5 different facts than Georgia, like Baltimore that Dr. Alford
6 referenced earlier today.

7 The reality on the ground in Georgia is that unlike
8 that of Alabama, this is not a place where intensive racial
9 politics are present in a way that the excessive role of race
10 in the electoral process denies minority voters an equal
11 opportunity to participate. Georgia is a state where any
12 candidate can make their case to the voters and win. And the
13 evidence shows that.

14 And ultimately if candidates are losing on these
15 redistricting plans that this Court is considering, it's not
16 on account of race or color. It's not a violation of the
17 Voting Rights Act. It's on account of partisanship or on
18 account of being a bad candidate. It's not on account of
19 race.

20 So in light of that, Your Honor, we would ask for a
21 defense verdict in the Alpha Phi Alpha case, in the Grant
22 case, in the Pendergrass case, because with all the evidence
23 before the Court, there is no substantial evidence supporting
24 a conclusion that any Georgia voter has their vote diluted on
25 account of race or color on these redistricting plans.

1 So we appreciate, again, and add our thanks for your
2 time, for the time of the staff and all the work that's gone
3 into this trial. We're grateful for the opportunity to
4 present our case. And thank you, Your Honor.

5 THE COURT: Thank you, Mr. Tyson.

6 Mr. Savitzky, you have roughly nine minutes left, I
7 was told.

8 THE DEPUTY CLERK: Yes, sir.

9 MR. SAVITZKY: Thank you very much, Your Honor.

10 And I don't intend to use the nine minutes unless the
11 Court has questions.

12 For the record, I just want to note, in case the
13 Court sees fit to use the slide deck, we will get you the deck
14 for our presentation.

15 On pages 5 and 6 of the deck that Mr. Tyson passed
16 out, there are various quotations and statements about the
17 Cooper APA plan and image that depicts a district that
18 Mr. Cooper did not draw and was not in his plan. So I wanted
19 to make sure that was clear in the record.

20 THE COURT: Pages 5 and 6, do you agree with that,
21 Mr. Tyson?

22 MR. TYSON: And, Your Honor, I apologize. I was
23 trying to use a generic map, and I did not catch that that
24 is -- that's one of Mr. Esselstyn's districts. So I agree,
25 those two maps are not Mr. Cooper's maps on the slides.

1 THE COURT: I will not consider them as Mr. Cooper's
2 maps.

3 MR. SAVITZKY: Thank you, Your Honor.

4 Other than that, I believe we've addressed why we
5 believe the conditions in the state demonstrate that the
6 political process is not equally open, that we've made our
7 case. We'd stand on our arguments.

8 Unless the Court has questions, we're happy to leave
9 it there.

10 THE COURT: You-all have been very thorough.

11 MR. SAVITZKY: Thank you, sir.

12 MS. KHANNA: Thank you, Your Honor.

13 And I guess I just want to briefly address one of the
14 points that Mr. Tyson raised just now, is -- I believe he said
15 at the top of his argument just now that this case in Georgia
16 is much easier than the average Section 2 case.

17 I've heard that before, Your Honor. And there was an
18 amicus brief that I wish I had my fingers on right now, but
19 there was an amicus brief in the Alabama case before the US
20 Supreme Court that I believe Chief Justice Roberts cited
21 during argument, but certainly I believe it was cited in the
22 majority opinion. And I can run that down.

23 But there was an amicus brief nonetheless that
24 specifically noted the statistics on Section 2 cases in this
25 country and the average Section 2 case fails. This is --

1 Section 2 is -- the standard that exists right now, it is a
2 gauntlet. And for a case to come this far is unusual. The
3 vast majority of these cases fail. And they fail at the
4 outset. They fail at the *Gingles* preconditions.

5 This idea that *Gingles* is just this checklist that
6 anyone can just come into court and establish, it just doesn't
7 get borne out by the facts.

8 And that gets to the point of what is the endpoint, I
9 believe was one of the questions that Mr. Tyson asked, how
10 will we know when we've gotten there?

11 And this is a question that I know that they've
12 pointed to Justice Kavanaugh's concurrence for. But the thing
13 about Section 2 of the Voting Rights Act, frankly, unlike
14 Section 5 of the Voting Rights Act, which was a big concern
15 when dealing with that provision, is that it has a built-in
16 sunset provision.

17 Chief Justice Roberts, when he wrote the *Shelby*
18 *County* opinion, specifically said that Section 2 remains a
19 permanent and nationwide injunction on voter discrimination.
20 And when I say that it has a built-in sunset provision, it's
21 because of the fact-intensive, quantitative and qualitative
22 gauntlet that plaintiffs have to establish in order to get to
23 a violation.

24 Where you don't have the kind of residential
25 segregation that you see, and that we've seen in these cases

1 of minority voters, of Black voters, you're not going to have
2 a Section 2 violation. You're not going to draw that
3 reasonably configured district, you're not going to find that
4 numerous and concentrated Black population.

5 Believe it or not, that doesn't happen all that
6 often. You don't get those populations. You don't see that
7 same level of racial segregation in areas that are outside of
8 Georgia and lots of areas in this country.

9 Where races vote for different candidates at
10 different times on different issues in different elections
11 based on the different offices that are speaking to them, not
12 uniformly in lockstep with their race, you don't have a
13 Section 2 violation.

14 The kinds of racial voting patterns that we see here,
15 as Dr. Alford said, are striking; you don't see them
16 everywhere. And many Section 2 cases fail at *Gingles* 1, 2 and
17 3 because the conditions that *Gingles* 1, 2 and 3 are testing
18 for are troublesome, emblematic of a system, of a society in
19 which race infuses the political process. And that is
20 unusual, Your Honor.

21 So on this point I might agree, this is not your
22 average Section 2 case, because your average Section 2 case is
23 really hard to establish.

24 Mr. Tyson asked -- well -- I believe stated that the
25 only way that racially polarized voting can disappear is if

1 Democrats start vote -- sorry -- if Democrats start voting for
2 Republicans and Republicans start voting for Democrats. It's
3 just not true, Your Honor. You don't see that, again, other
4 places where there's no Section 2 violations or no Section 2
5 claims to be found.

6 The way that racially polarized voting disappears
7 or even abates is by having elected officials who can start
8 trying to represent the interests of different races, by
9 having elected officials who view themselves as responsive to
10 different racial pockets within their jurisdictions. Because,
11 again, Black voters are not -- Black people are not born
12 Democrats. White people are not born Republicans. This is
13 not some, you know, accident that people have a political
14 party affiliation. Voters are smart. And they vote in their
15 interests. And they vote for the candidates who represent
16 their interests.

17 My final point, Your Honor, is a lot of what we've
18 heard from the defendants is really an attempt to reimport an
19 intense standard that has been thoroughly and repeatedly
20 rejected under the Section 2 results test. You heard words
21 like "but for causation" in Mr. Tyson's discussion of the
22 Senate factors analysis. Yeah, but that's not -- but racial
23 appeals have not caused the disparities. They're not
24 specifically about redistricting. I think the socioeconomic
25 status is not the cause of redistricting-related issues. I'm

1 not sure. I mean, the slide that defendants just put up says,
2 well, that only shows the current state of minority life in
3 Georgia.

4 I have trouble reconciling that kind of
5 it-is-what-it-is approach, because at the end of the day, what
6 is the totality of circumstances analysis? It is not a way of
7 reimporting causation and intent and animus at every single
8 point in the process. It is not reinjecting that factor into
9 plaintiffs' burden.

10 But the Senate factors analysis is comprehensive.
11 It's meant to understand what is life and politics and
12 socioeconomics and campaigns. What is it like in this
13 jurisdiction? And to what extent does race inform and does
14 race infuse and does race divide on these fundamental issues?

15 And I would submit, Your Honor, that in Georgia that
16 extent remains high. It doesn't have to be that way. It is
17 not that way everywhere. And it doesn't have to be that way
18 forever. But it is no answer to say politics as usual or the
19 state of minority life, because politics as usual and the
20 state of minority life is exactly what got us to the Voting
21 Rights Act in the first place. That was the politics as usual
22 as people in power trying to retain power by suppressing those
23 in opposition.

24 The state of minority life in Georgia has gotten a
25 lot better since the '60s. But the state of minority life in

1 Georgia is starkly disparate, particularly in the areas that
2 we're talking about here; right? And that's another specific
3 question that I think the defendants really fail to grapple
4 with; right?

5 We're not painting all Black voters in Georgia with a
6 broad brush, oh, you have Democrats, you have -- you know, I
7 see some Black elected officials; let's just, you know, all go
8 home and call it a day for the Voting Rights Act. We're
9 talking about Black voters in the Black Belt who had -- the
10 State's map drawer got up there and said there's no such thing
11 as the Black Belt.

12 These opportunities cannot be painted with a broad
13 brush. It is incumbent on us to establish -- us as plaintiffs
14 to establish the facts on the ground and to give this Court
15 everything it needs to conduct that localized, highly
16 fact-intensive appraisal of all of these factors.

17 And the Court cannot follow defendants down a path of
18 saying slippery slope of minority voting rights, or the
19 numbers are good enough, or can we just, you know, call enough
20 enough.

21 The Section 2 legal standard tells us when is -- when
22 have we satisfied the Voting Rights Act? It's not a mystery.
23 It's the same standard. It is a meticulous and fact-intensive
24 standard. It's a standard we have established here. It
25 doesn't leave any question marks.

1 So to the extent that defendants, the State of
2 Georgia, remain confused about, well, what is required under
3 the law, I would submit, Your Honor, that it might be because
4 they're looking outside of the Voting Rights Act law; when
5 Mr. Tyson said in his opening statement, I really didn't
6 understand what the *Allen* case meant until I read the
7 affirmative action case three weeks later.

8 I mean, at some point, we just have to take the
9 courts at their word that the law of Section 2 in
10 redistricting is what it is. It may not be what the
11 defendants want it to be, but it is what it is. And we have
12 to follow that law.

13 And if defendants are confused, all they have to do
14 is read that law and think through these standards. Not
15 looking at affirmative action in college admissions. Not
16 looking at *City of Mobile* and *Whitcomb v. Chavis* to find
17 intentional discrimination.

18 Looking at the Section 2 precedent and looking at the
19 Section 2 facts yields only one conclusion in the Pendergrass
20 and Grant cases, and that is that there is a violation of
21 Section 2.

22 I'm happy to answer any questions if the Court has
23 any.

24 THE COURT: No questions.

25 MS. KHANNA: Thank you, Your Honor.

1 THE COURT: Thank you, Ms. Khanna.

2 The first week of January 2022 I had arrived back to
3 Georgia from Miami after watching Georgia defeat Michigan and
4 learned that I had been assigned this case. I remember saying
5 two things to myself, Mr. Savitzky. Why me?

6 No, I didn't say that.

7 The first thing I said, this is a very important
8 case. It's going to have a big effect on a lot of people.

9 The second thing I said to myself, this is going to
10 be a very difficult case to decide. In a sense, you-all have
11 made it more difficult and less difficult. You've made it
12 less difficult because you-all have done an outstanding job
13 presenting the cases. You've given me a lot of information
14 that I need to make a decision. And on that part, you made
15 it somewhat hard; and that's everybody's doing their job
16 presenting what you had to present in a way of representing
17 your client.

18 Now, here's where I start now. And I have to go
19 through all the information and try to make a decision that I
20 think fits the facts with the law. And it goes back to the
21 first thing I thought about, my decision is going to have an
22 effect on a whole lot of people one way or another. If I rule
23 for the plaintiffs, if I rule for the State, it's going to
24 have an effect on a lot of people. So I have to make sure I
25 look at everything very thoroughly, fairly, and try to make

1 the best decision I can as soon as I can.

2 I can't tell you-all exactly when I'm going to render
3 my decision, but I can tell you this much: We start working
4 on this in 15 minutes. Actually, we've already started
5 reading these things. It goes back to the first thing I said
6 to myself whenever I realized this case had been assigned to
7 me: This is a very important case that will have an effect on
8 a lot of people's lives, and I have to make sure I do it right
9 and give it everything I have.

10 I owe that to the people of Georgia, and I owe that
11 to you-all. But you-all have done an outstanding job. Every
12 one of you-all: Alpha attorneys, Grant/Pendergrass attorneys,
13 State attorneys.

14 As a judge, I'm going to tell you-all, I've been a
15 judge since 1993, I've seen the best and I've seen not so much
16 of the best. When you get the best, it makes it a whole lot
17 easier to try and do what you've got to do. So I commend you
18 and I thank you.

19 And as I said in the beginning, I'll try to get you a
20 ruling back as soon as possible, but it's a lot of information
21 and I have an obligation to make sure I try to do the best job
22 I can.

23 So thank you, all. I would say Happy Thanksgiving,
24 but I'm going to get it back to you before Thanksgiving, that
25 I can assure you.

1 So what I always say, go Dawgs. Thank you.

2 (PROCEEDINGS REPORTED WERE CONCLUDED AT 4:51 P.M.)

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C E R T I F I C A T E

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF GEORGIA

I do hereby certify that the foregoing pages are a true
and correct transcript of the proceedings taken down by me in
the case aforesaid.

This the 15th Day of September, 2023.

Penny Pritty Coudrinet

PENNY PRITTY COUDRIET, RMR, CRR
OFFICIAL COURT REPORTER

'60S [1] - 92:25	202 [8] - 28:9, 72:24, 73:2, 73:3, 73:15, 73:22, 77:3, 77:6 2020 [6] - 28:16, 34:23, 42:5, 49:18, 73:22, 83:17 2021 [1] - 33:1 2022 [1] - 95:2 2023 [3] - 1:21, 24:13, 98:9 218 [1] - 45:9 222 [1] - 45:11 225 [1] - 45:14 226 [1] - 45:14 23 [7] - 10:23, 51:16, 51:17, 51:20, 64:9, 68:2, 68:4 25 [2] - 68:6, 68:25 25TH [1] - 3:24 270 [1] - 45:18 274 [1] - 45:18 28 [3] - 10:1, 36:22, 67:23 29.8 [1] - 83:14 2:50 [1] - 32:20	7 7 [5] - 27:11, 36:4, 36:20, 51:3, 79:20 70 [2] - 28:10, 49:11 74 [5] - 11:12, 64:13, 66:20, 66:25, 68:19 77 [1] - 66:22
1		8 8 [4] - 1:4, 27:23, 51:10, 80:8 80 [1] - 41:12
1 [26] - 5:9, 6:8, 6:12, 8:12, 13:10, 14:22, 23:20, 39:16, 40:5, 40:15, 42:8, 42:10, 42:22, 44:24, 46:1, 48:21, 60:4, 60:7, 60:15, 60:25, 67:4, 67:6, 69:10, 90:16, 90:17 1,300 [1] - 69:21 1.4 [1] - 49:2 1.5 [1] - 8:12 10 [3] - 35:5, 68:7, 68:24 117 [3] - 11:20, 64:14, 68:19 11TH [5] - 17:1, 60:10, 74:14, 76:17, 78:7 128 [1] - 64:4 13 [6] - 41:1, 68:16, 69:18, 70:2, 70:3, 70:4 133 [3] - 12:2, 63:25, 64:6 14 [4] - 1:21, 36:21, 39:4, 39:6 145 [4] - 12:8, 12:15, 12:17, 64:14 15 [1] - 96:4 155 [1] - 11:25 15TH [1] - 98:9 16 [1] - 15:19 17 [3] - 10:11, 59:7, 64:9 171 [2] - 12:21, 64:15 18 [1] - 59:8 19 [1] - 59:4 1965 [5] - 21:14, 34:18, 34:21, 46:10, 53:5 1990 [1] - 46:10 1993 [1] - 96:15 1:21-CV-5339-SCJ [1] - 1:11 1:22-CV-00122-SCJ [1] - 1:16 1:48 [1] - 3:1	3 3 [20] - 5:13, 14:23, 15:7, 16:4, 16:24, 23:20, 42:21, 45:5, 45:7, 45:8, 45:13, 45:19, 47:8, 48:15, 48:23, 60:16, 70:13, 76:23, 90:17 3,000 [1] - 73:10 30 [4] - 35:5, 36:1, 37:24, 61:19 34 [1] - 68:24 35 [1] - 39:4 3:00 [1] - 32:18 3:50 [2] - 55:14, 55:22	9 9 [2] - 39:6, 52:24 90 [2] - 36:23, 65:8 98 [1] - 77:7
2	4 4 [1] - 48:24 403 [1] - 50:13 41 [1] - 39:22 42 [1] - 39:22 45 [1] - 46:18 4:51 [1] - 97:2	A ABATES [1] - 91:7 ABBOTT [1] - 84:17 ABHA [1] - 2:11 ABHA [1] - 32:22 ABILITY [4] - 15:18, 30:24, 34:3, 78:13 ABLE [4] - 9:15, 46:14, 62:25, 85:12 ABRAMS [1] - 49:5 ABSTRACT [1] - 52:4 ACCESS [4] - 49:22, 49:24, 52:15, 69:2 ACCESSING [1] - 50:9 ACCIDENT [2] - 48:10, 91:13 ACCOMMODATING [1] - 39:18 ACCOMPANIED [1] - 53:7 ACCOMPLISHED [1] - 38:20 ACCOUNT [9] - 19:25, 58:1, 67:19, 67:20, 86:16, 86:17, 86:18, 86:25 ACCOUNTS [1] - 22:20 ACHIEVE [6] - 34:17, 63:25, 66:11, 81:22, 82:6, 82:8 ACHIEVES [1] - 53:9 ACKNOWLEDGE [2] - 4:10, 4:17 ACT [25] - 33:5, 34:7, 34:19, 37:23, 42:3, 48:19, 53:22, 53:24, 55:12, 58:3, 59:17, 70:6, 71:7, 74:23, 84:18, 85:5, 85:25, 86:3, 86:17, 89:13, 89:14, 92:21, 93:8, 93:22, 94:4 ACTION [5] - 41:23, 42:2, 51:25, 94:7, 94:15 ACTIVE [2] - 51:18, 77:13 ACTUAL [2] - 40:4, 46:13 ACUTELY [1] - 26:11 AD [1] - 79:6 ADAM [1] - 2:12 ADD [3] - 37:6, 62:13, 87:1 ADDED [1] - 63:24 ADDING [1] - 8:3 ADDITION [2] - 53:18, 68:17 ADDITIONAL [9] - 6:25, 7:20, 8:3, 40:12, 41:11, 42:4, 45:3, 65:13, 68:11 ADDITIONALLY [1] - 11:5
2 [7] - 5:13, 14:23, 14:25, 15:7, 15:17, 16:24, 18:5, 19:3, 24:16, 27:21, 31:16, 33:4, 33:8, 38:6, 38:11, 42:2, 42:21, 45:5, 45:7, 45:8, 45:10, 45:19, 46:15, 47:8, 48:22, 55:12, 56:6, 56:9, 56:10, 57:7, 57:12, 58:11, 58:13, 59:3, 59:11, 60:1, 60:16, 60:20, 60:21, 65:22, 66:9, 70:13, 70:17, 72:12, 77:14, 81:8, 81:17, 82:5, 84:16, 86:3, 88:16, 88:24, 88:25, 89:1, 89:13, 89:18, 90:2, 90:13, 90:16, 90:17, 90:22, 91:4, 91:20, 93:21, 94:9, 94:18, 94:19, 94:21 20 [2] - 27:20, 55:18 200 [1] - 34:25 2000 [1] - 46:10 2010 [2] - 7:18, 46:10 2012 [1] - 49:2 2015 [1] - 24:16 2018 [3] - 49:2, 49:6, 83:19	5 5 [8] - 25:7, 39:3, 48:18, 48:25, 49:23, 87:15, 87:20, 89:14 50 [8] - 8:25, 35:5, 39:5, 39:8, 68:13, 68:21, 81:23, 83:8 54 [1] - 15:20 55 [1] - 65:7 55.58 [1] - 83:18	
	6 6 [10] - 26:19, 37:10, 40:25, 50:11, 50:20, 69:17, 70:5, 83:17, 87:15, 87:20 64 [2] - 39:7, 68:19 69 [2] - 66:20, 66:21	

<p>ADDRESS [7] - 15:4, 17:25, 18:1, 27:25, 33:21, 65:22, 88:13</p> <p>ADDRESSED [3] - 46:19, 71:22, 88:4</p> <p>ADDRESSING [1] - 52:1</p> <p>ADMINISTRATION [1] - 73:16</p> <p>ADMINISTRATIVE [1] - 3:7</p> <p>ADMISSION [1] - 44:13</p> <p>ADMISSIONS [1] - 94:15</p> <p>ADMITTED [2] - 10:18, 47:19</p> <p>ADOPT [1] - 48:19</p> <p>ADS [2] - 26:25, 27:6</p> <p>ADVANCE [1] - 54:14</p> <p>ADVANCING [1] - 38:13</p> <p>ADVICE [1] - 56:5</p> <p>ADVOCATE [1] - 52:18</p> <p>AFFECTED [1] - 12:19</p> <p>AFFECTING [2] - 75:1, 75:2</p> <p>AFFILIATION [2] - 47:25, 91:14</p> <p>AFFILIATIONS [2] - 20:22, 21:9</p> <p>AFFIRMANCE [1] - 13:14</p> <p>AFFIRMATIVELY [2] - 19:4, 47:11</p> <p>AFORESAID [1] - 98:8</p> <p>AFTERNOON [3] - 4:3, 4:4, 33:15</p> <p>AGE [2] - 36:2, 76:24</p> <p>AGO [4] - 3:15, 35:5, 37:24, 80:19</p> <p>AGRARIAN [1] - 13:7</p> <p>AGREE [6] - 6:10, 29:8, 85:9, 87:20, 87:24, 90:21</p> <p>AGREED [1] - 11:22</p> <p>AGREEMENT [1] - 69:11</p> <p>AH-HA [1] - 73:16</p> <p>AHEAD [2] - 71:11, 81:25</p> <p>AIR [2] - 52:10, 80:15</p> <p>AL [5] - 1:5, 1:10, 1:12, 1:14, 1:17</p> <p>ALABAMA [5] - 57:5, 64:23, 86:4, 86:8, 88:19</p> <p>ALARM [1] - 68:15</p> <p>ALBANY [1] - 13:1</p> <p>ALEX [1] - 2:4</p> <p>ALFORD [12] - 19:17, 47:5, 47:15, 47:19, 57:18, 74:21, 74:25, 75:10, 75:19, 76:7, 86:5, 90:15</p> <p>ALFORD'S [1] - 21:17</p> <p>ALIKE [1] - 61:10</p> <p>ALLEGATION [1] - 74:4</p> <p>ALLEGED [1] - 42:1</p> <p>ALLEN [6] - 33:12, 56:11, 78:16, 79:24, 84:23, 94:6</p> <p>ALLOW [1] - 40:11</p> <p>ALMOST [4] - 11:14, 35:1, 42:21, 56:1</p> <p>ALONE [4] - 14:9, 40:5, 65:25, 71:16</p> <p>ALPHA [2] - 1:4</p> <p>ALPHA [20] - 4:5, 4:12, 5:7, 14:22, 20:14, 32:13, 59:9, 60:25, 61:13, 67:2, 67:3, 69:13, 76:1, 86:21, 96:12</p> <p>ALPHAS [2] - 28:15, 28:19</p> <p>ALTER [1] - 75:14</p> <p>AMASSED [1] - 20:15</p> <p>AMBIGUOUS [1] - 14:14</p>	<p>AMICUS [3] - 88:18, 88:19, 88:23</p> <p>ANALYSES [1] - 15:14</p> <p>ANALYSIS [18] - 7:4, 8:22, 14:19, 15:14, 27:16, 42:21, 43:9, 47:5, 47:10, 60:19, 72:11, 74:19, 75:4, 75:25, 79:18, 91:22, 92:6, 92:10</p> <p>ANALYTICAL [2] - 29:4, 65:2</p> <p>ANALYZE [1] - 47:11</p> <p>ANALYZED [1] - 22:8</p> <p>ANALYZES [1] - 43:8</p> <p>ANALYZING [1] - 43:25</p> <p>ANGELS [1] - 85:8</p> <p>ANGLE [1] - 54:5</p> <p>ANIMUS [2] - 19:7, 92:7</p> <p>ANNIE [1] - 1:14</p> <p>ANSWER [16] - 6:17, 16:12, 20:4, 23:12, 23:19, 46:18, 46:22, 46:24, 47:12, 47:14, 57:1, 67:10, 82:14, 92:18, 94:22</p> <p>ANTICIPATE [2] - 28:23, 53:20</p> <p>ANTICIPATION [1] - 39:25</p> <p>ANUJ [1] - 2:9</p> <p>APA [1] - 87:17</p> <p>APOLLO [1] - 68:15</p> <p>APOLOGIZE [1] - 87:22</p> <p>APPARENT [2] - 27:14, 38:24</p> <p>APPEAL [1] - 78:19</p> <p>APPEALS [24] - 21:21, 21:23, 21:25, 26:20, 26:21, 27:4, 27:7, 27:9, 30:12, 31:22, 50:11, 50:18, 50:22, 50:25, 78:14, 78:15, 79:6, 79:8, 79:11, 79:12, 79:14, 79:15, 79:16, 91:23</p> <p>APPEARANCES [1] - 2:1</p> <p>APPLES [4] - 36:11, 43:15</p> <p>APPLES-TO-APPLES [2] - 36:11, 43:15</p> <p>APPLICATIONS [1] - 49:11</p> <p>APPLIED [3] - 4:25, 33:9, 83:18</p> <p>APPLIES [1] - 58:12</p> <p>APPLY [1] - 32:9</p> <p>APPLYING [1] - 19:9</p> <p>APPRAISAL [7] - 9:23, 17:11, 23:5, 27:22, 71:20, 72:13, 93:16</p> <p>APPRAISALS [1] - 60:2</p> <p>APPRECIATE [1] - 87:1</p> <p>APPROACH [4] - 9:12, 59:25, 72:4, 92:5</p> <p>APPROPRIATE [1] - 36:15</p> <p>AREA [15] - 5:20, 8:2, 11:9, 11:16, 11:20, 12:1, 12:18, 13:6, 64:11, 65:4, 65:5, 70:5, 80:24</p> <p>AREAS [43] - 5:7, 5:23, 7:5, 7:11, 7:22, 10:14, 13:3, 15:11, 15:12, 15:21, 15:23, 16:14, 16:17, 17:11, 17:16, 17:23, 23:15, 23:16, 25:19, 27:14, 27:15, 27:17, 29:12, 29:16, 29:20, 30:3, 30:11, 30:19, 31:3, 32:12, 41:17, 45:13, 61:20, 63:24, 67:24, 67:25, 68:18, 80:17, 83:8, 90:7, 90:8, 93:1</p> <p>ARGUE [5] - 13:18, 14:25, 36:9, 50:18, 50:22</p> <p>ARGUES [2] - 24:5, 81:24</p>	<p>ARGUING [3] - 37:1, 82:17</p> <p>ARGUMENT [20] - 4:8, 13:20, 14:8, 18:6, 31:7, 31:12, 34:1, 34:4, 34:10, 36:10, 37:24, 38:13, 42:10, 44:24, 53:20, 54:5, 55:15, 72:6, 88:15, 88:21</p> <p>ARGUMENTS [5] - 6:7, 15:5, 18:1, 33:16, 88:7</p> <p>ARI [1] - 2:4</p> <p>ARI [1] - 4:5</p> <p>ARRIVED [1] - 95:2</p> <p>ARTICULATE [1] - 9:15</p> <p>ASIDE [2] - 28:7, 67:20</p> <p>ASSEMBLY [2] - 27:20, 65:21</p> <p>ASSERT [2] - 40:20, 52:11</p> <p>ASSERTION [1] - 52:6</p> <p>ASSESS [1] - 6:19</p> <p>ASSIGNED [3] - 14:8, 48:9, 95:4, 96:6</p> <p>ASSUME [2] - 61:9, 78:8</p> <p>ASSUMING [1] - 3:12</p> <p>ASSURE [1] - 96:25</p> <p>ASTRONAUTS [1] - 68:15</p> <p>AT [2] - 3:1, 97:2</p> <p>AT-LARGE [2] - 24:14, 80:22</p> <p>ATLANTA [14] - 7:7, 10:1, 10:15, 15:21, 16:18, 27:17, 30:17, 37:17, 40:10, 41:17, 45:1, 65:4, 68:19</p> <p>ATLANTA [3] - 1:2, 2:1, 3:2</p> <p>ATTACHED [1] - 66:23</p> <p>ATTACK [1] - 43:4</p> <p>ATTAINMENT [2] - 26:7, 26:10</p> <p>ATTEMPT [2] - 38:19, 91:18</p> <p>ATTEMPTED [1] - 25:1</p> <p>ATTORNEYS [3] - 96:12, 96:13</p> <p>ATTRIBUTABLE [2] - 19:12, 41:13</p> <p>ATTRIBUTED [1] - 51:8</p> <p>ATTRIBUTES [2] - 13:7, 13:8</p> <p>ATTUNED [1] - 80:10</p> <p>AUTHORITY [1] - 84:24</p> <p>AUTOMATIC [1] - 23:6</p> <p>AVAILABLE [1] - 49:20</p> <p>AVAILING [1] - 42:13</p> <p>AVERAGE [5] - 56:10, 88:16, 88:25, 90:22</p> <p>AVOID [3] - 41:10, 53:21, 53:23</p> <p>AVOIDED [1] - 75:3</p> <p>AVOIDING [2] - 12:5, 81:8</p> <p>AVOIDS [1] - 85:1</p> <p>AWARE [2] - 8:22, 13:22</p>
B		
<p>BAD [1] - 86:18</p> <p>BAFFLING [2] - 7:18, 54:7</p> <p>BAILEY [1] - 4:10</p> <p>BAIT [2] - 37:5, 37:20</p> <p>BAIT-AND-SWITCH [2] - 37:5, 37:20</p> <p>BALANCED [5] - 6:20, 8:7, 8:11, 9:12, 9:19</p> <p>BALANCING [2] - 12:5, 13:23</p> <p>BALLOT [1] - 75:11</p>		

<p>BALTIMORE^[1] - 86:5 BANK^[1] - 9:22 BARELY^[2] - 14:17, 29:19 BARRIERS^[2] - 50:9, 78:5 BASED^[23] - 20:22, 23:15, 26:22, 33:6, 43:7, 44:20, 47:7, 55:6, 60:21, 61:7, 61:11, 61:24, 65:7, 67:4, 71:16, 73:25, 75:6, 84:21, 84:24, 85:6, 85:12, 85:19, 90:11 BASIC^[1] - 31:24 BASIS^[8] - 34:12, 34:25, 36:20, 44:1, 46:13, 66:8, 71:10, 80:1 BEAR^[3] - 47:22, 78:12, 79:17 BEARS^[5] - 21:4, 21:19, 21:20, 22:2, 80:14 BEAT^[2] - 39:13, 83:20 BEAUTY^[2] - 13:10, 13:11 BECOME^[1] - 35:9 BEFORE^[1] - 1:20 BEGAN^[1] - 53:11 BEGIN^[2] - 56:11, 57:9 BEGINNING^[1] - 96:19 BEGINS^[1] - 72:16 BEHALF^[2] - 2:2, 2:13 BEHALF^[2] - 32:23, 51:23 BEHAVE^[1] - 19:25 BEHAVIOR^[12] - 18:7, 18:14, 19:22, 19:24, 21:22, 31:24, 75:1, 75:2, 75:15, 78:2 BEHIND^[2] - 71:7, 72:13 BEHOLD^[1] - 43:24 BELABOR^[1] - 66:19 BELIEVES^[2] - 47:9, 47:12 BELL^[1] - 68:15 BELONG^[1] - 15:6 BELT^[15] - 7:12, 10:25, 11:7, 12:3, 15:22, 16:18, 27:18, 30:18, 45:1, 45:2, 51:12, 54:18, 54:19, 93:9, 93:11 BENCH^[1] - 1:20 BENCHMARK^[2] - 64:23, 83:17 BEND^[1] - 41:10 BENEFIT^[1] - 82:1 BERTOVICH^[2] - 70:16, 70:18 BEST^[16] - 8:14, 12:13, 18:14, 20:16, 21:6, 22:17, 22:18, 22:24, 46:19, 48:7, 57:19, 96:1, 96:15, 96:16, 96:21 BETHUNE^[3] - 61:2, 66:13, 67:8 BETHUNE-HILL^[3] - 61:2, 66:13, 67:8 BETTER^[5] - 7:25, 22:24, 47:2, 55:19, 92:25 BETWEEN^[9] - 10:21, 21:8, 25:18, 49:1, 50:2, 64:25, 66:6, 66:7, 85:4 BEYOND^[5] - 45:19, 60:15, 66:4, 67:18, 71:7 BIAS^[1] - 18:21 BIBB^[1] - 12:18 BIG^[4] - 17:10, 34:1, 89:14, 95:8 BIG-PICTURE^[1] - 34:1 BILL^[8] - 7:4, 72:24, 73:1, 73:3, 73:15,</p>	<p>73:22, 77:3, 77:6 BIRTH^[1] - 48:10 BISHOP^[2] - 13:5, 22:16 BIT^[6] - 28:23, 40:2, 67:11, 71:11, 73:2, 76:24 BLACK^[218] - 5:8, 5:11, 5:12, 5:20, 6:13, 7:5, 7:12, 7:13, 7:16, 7:21, 8:4, 10:25, 11:7, 12:3, 15:19, 15:22, 15:24, 16:1, 16:5, 16:10, 16:14, 16:15, 16:18, 16:20, 16:22, 17:5, 17:7, 17:15, 17:23, 19:5, 19:19, 20:5, 20:20, 21:3, 21:12, 22:13, 23:17, 23:25, 24:20, 24:24, 25:2, 25:6, 25:8, 25:14, 25:18, 25:20, 25:23, 26:2, 26:3, 26:5, 26:9, 26:22, 26:23, 26:25, 27:1, 27:12, 27:18, 27:20, 28:2, 28:3, 28:10, 28:18, 29:6, 29:14, 29:17, 29:18, 30:6, 30:17, 30:21, 30:22, 31:4, 31:17, 34:2, 34:5, 34:8, 34:11, 34:15, 35:7, 35:13, 35:22, 35:23, 36:2, 36:12, 37:9, 37:16, 38:20, 38:24, 40:10, 40:12, 40:25, 41:11, 41:13, 42:3, 42:5, 44:5, 44:9, 44:20, 44:25, 45:1, 45:2, 45:4, 45:9, 45:12, 45:15, 45:16, 48:3, 48:5, 49:5, 49:9, 49:13, 49:14, 49:19, 49:21, 49:24, 49:25, 50:6, 51:3, 51:6, 51:8, 51:12, 52:12, 52:13, 52:14, 53:4, 54:10, 54:17, 54:18, 54:19, 58:19, 58:24, 59:5, 60:5, 60:17, 61:15, 61:19, 61:21, 62:13, 62:20, 62:22, 63:3, 63:18, 63:21, 63:23, 64:1, 64:5, 64:10, 64:14, 64:17, 65:6, 65:13, 66:21, 66:22, 66:25, 67:24, 68:3, 68:18, 68:22, 69:16, 69:17, 69:18, 69:23, 70:10, 70:11, 72:8, 74:5, 74:11, 75:2, 75:11, 75:15, 75:16, 75:17, 75:23, 76:4, 76:8, 76:9, 76:11, 76:12, 77:24, 78:3, 78:23, 79:8, 79:19, 79:20, 79:21, 79:22, 79:25, 80:4, 80:5, 80:19, 80:21, 80:24, 81:23, 81:25, 82:20, 82:21, 82:23, 83:2, 83:6, 83:7, 83:8, 83:14, 84:8, 85:23, 90:1, 90:4, 91:11, 93:5, 93:7, 93:9, 93:11 BLACK-PREFERRED^[1] - 80:5 BLACKS^[1] - 22:16 BLATANT^[1] - 38:9 BLIND^[2] - 64:19, 65:3 BLOC^[10] - 15:9, 15:13, 15:18, 16:1, 23:18, 29:14, 29:15, 74:15, 74:17, 75:8 BODILY^[1] - 49:17 BOIL^[1] - 39:9 BOOKS^[2] - 33:20, 46:8 BORN^[3] - 30:8, 91:11, 91:12 BORNE^[1] - 89:7 BOTTOM^[5] - 18:6, 38:12, 38:17, 44:19, 50:8 BOULEE^[2] - 73:5, 73:12 BOUNDARIES^[4] - 11:15, 16:15, 62:10 BOXES^[2] - 73:23, 74:6</p>	<p>BOYLE^[1] - 2:16 BRAD^[3] - 1:7, 1:12, 1:17 BREAK^[3] - 32:17, 40:2, 55:14 BREAKING^[1] - 59:21 BREATH^[1] - 39:25 BRICK^[2] - 6:5, 6:6 BRIEF^[4] - 73:9, 88:18, 88:19, 88:23 BRIEFLY^[3] - 9:25, 45:21, 88:13 BRING^[1] - 40:19 BRINGS^[1] - 45:20 BROAD^[2] - 93:6, 93:12 BROADSIDE^[1] - 43:4 BROUGHT^[1] - 18:2 BRUSH^[2] - 93:6, 93:13 BRYAN^[2] - 2:14, 2:15 BUILDING^[1] - 80:23 BUILT^[3] - 80:20, 89:15, 89:20 BUILT-IN^[2] - 89:15, 89:20 BULGES^[1] - 29:19 BUNCH^[2] - 57:7, 74:2 BURCH^[10] - 11:6, 25:11, 25:13, 25:17, 25:25, 26:15, 27:24, 28:3, 28:10, 77:24 BURDEN^[6] - 19:4, 19:6, 25:6, 47:22, 73:18, 92:9 BURDENS^[3] - 25:15, 26:11, 26:15 BURDENSOME^[1] - 29:22 BURNING^[1] - 53:7 BURTON^[11] - 18:16, 20:18, 21:20, 21:25, 23:23, 24:11, 24:17, 24:19, 47:23, 48:17, 49:7 BUSH^[1] - 81:7 BUSINESSOWNER^[1] - 51:14 BUTTS^[1] - 68:9 BY^[1] - 1:23 BYPASSING^[1] - 81:21</p> <p style="text-align: center;">C</p> <p>CAITLIN^[1] - 2:6 CALCULATION^[1] - 75:6 CAMILLA^[1] - 13:1 CAMPAIGN^[1] - 78:20 CAMPAIGNS^[3] - 50:19, 78:15, 92:12 CANDIDATE^[24] - 15:25, 27:5, 27:9, 45:12, 47:17, 49:6, 51:18, 74:10, 74:23, 75:1, 75:5, 75:15, 75:22, 76:1, 76:4, 76:11, 76:12, 78:20, 78:21, 79:5, 83:3, 83:25, 86:12, 86:18 CANDIDATES^[55] - 5:12, 15:19, 16:1, 16:5, 16:11, 16:16, 17:8, 19:12, 19:20, 21:1, 21:14, 21:18, 21:22, 22:18, 26:25, 27:1, 27:6, 31:21, 31:23, 34:2, 34:6, 34:12, 35:18, 36:8, 36:22, 36:23, 36:24, 45:15, 45:16, 48:6, 48:13, 49:21, 51:3, 51:6, 60:18, 61:11, 72:9, 75:22, 76:8, 77:23, 79:21, 79:23, 80:4, 80:6, 82:20, 82:21, 83:7, 84:7, 85:12, 86:14, 90:9, 91:15 CANNOT^[13] - 17:21, 22:5, 22:11,</p>
---	---	--

<p>31:16, 35:21, 37:19, 37:21, 51:8, 53:16, 66:16, 84:24, 93:12, 93:17</p> <p>CAPABLE [1] - 58:19</p> <p>CARD [1] - 81:2</p> <p>CAREFULLY [1] - 75:3</p> <p>CARES [2] - 9:2</p> <p>CARRIES [1] - 4:22</p> <p>CARTER [1] - 80:5</p> <p>CASE [76] - 4:12, 5:3, 5:7, 5:14, 6:1, 6:5, 6:15, 9:5, 15:14, 17:2, 18:22, 19:3, 19:8, 25:19, 28:9, 32:13, 33:19, 39:10, 40:3, 40:6, 42:10, 42:11, 42:18, 45:17, 46:21, 46:23, 54:6, 56:2, 56:9, 56:10, 56:20, 57:19, 59:18, 60:6, 64:24, 69:10, 70:15, 70:16, 70:17, 70:19, 71:19, 73:20, 74:6, 77:14, 79:17, 80:18, 82:11, 83:5, 84:8, 84:10, 84:21, 84:23, 85:10, 86:12, 86:21, 86:22, 87:4, 87:12, 88:7, 88:15, 88:16, 88:19, 88:25, 89:2, 90:22, 94:6, 94:7, 95:4, 95:8, 95:10, 96:6, 96:7, 98:8</p> <p>CASES [17] - 8:25, 42:16, 42:17, 43:18, 45:25, 47:16, 54:3, 58:9, 59:24, 72:12, 73:2, 88:24, 89:3, 89:25, 90:16, 94:20, 95:13</p> <p>CATCH [1] - 87:23</p> <p>CAUSATION [3] - 78:8, 91:21, 92:7</p> <p>CAUSED [1] - 91:23</p> <p>CAUSES [1] - 19:13</p> <p>CAUSING [1] - 57:3</p> <p>CD6 [1] - 37:16</p> <p>CD7 [2] - 36:9, 37:18</p> <p>CEILING [2] - 38:21, 57:12</p> <p>CENSUS [5] - 7:18, 28:16, 28:17, 67:18, 83:17</p> <p>CENTER [1] - 10:9</p> <p>CENTERS [1] - 11:11</p> <p>CENTRAL [1] - 47:12</p> <p>CENTURIES [1] - 23:24</p> <p>CERTAIN [3] - 28:11, 52:20, 67:15</p> <p>CERTAINLY [3] - 19:6, 47:10, 88:21</p> <p>CERTIFY [1] - 98:6</p> <p>CHALLENGE [4] - 49:16, 58:10, 80:12, 82:10</p> <p>CHALLENGED [5] - 17:12, 74:4, 78:13, 79:17, 80:10</p> <p>CHALLENGES [4] - 25:1, 49:15, 49:16, 69:15</p> <p>CHALLENGING [1] - 5:24</p> <p>CHANCE [1] - 55:4</p> <p>CHANGE [6] - 12:1, 21:1, 23:12, 32:7, 75:22, 79:20</p> <p>CHANGED [6] - 7:8, 7:14, 7:15, 62:21, 73:24, 83:23</p> <p>CHANGES [3] - 63:9, 65:22, 73:22</p> <p>CHANGING [1] - 32:3</p> <p>CHARACTERISTIC [1] - 48:10</p> <p>CHARACTERIZATION [1] - 45:24</p> <p>CHARACTERIZED [2] - 78:15, 79:15</p> <p>CHAVIS [1] - 94:16</p>	<p>CHECK [1] - 60:6</p> <p>CHECKED [1] - 62:5</p> <p>CHECKLIST [6] - 56:23, 60:3, 60:15, 72:4, 72:10, 89:5</p> <p>CHERRY [1] - 14:19</p> <p>CHERRY-PICKING [1] - 14:19</p> <p>CHEUNG [1] - 2:7</p> <p>CHIEF [1] - 88:20</p> <p>CHIEF [1] - 89:17</p> <p>CHOICE [3] - 16:16, 17:8, 39:18</p> <p>CHOICES [2] - 25:24, 26:1</p> <p>CHOOSE [1] - 37:17</p> <p>CHURCH [1] - 28:19</p> <p>CIRCLING [1] - 79:8</p> <p>CIRCUIT [5] - 17:1, 60:10, 74:15, 76:17, 78:7</p> <p>CIRCUMSTANCES [12] - 5:25, 15:6, 17:1, 17:9, 19:2, 23:2, 31:2, 45:21, 46:7, 46:25, 79:10, 92:6</p> <p>CITED [3] - 70:16, 88:20, 88:21</p> <p>CITIES [1] - 81:11</p> <p>CITIZENS [2] - 24:20, 24:24</p> <p>CITIZENSHIP [1] - 48:22</p> <p>CITY [3] - 9:1, 63:20, 94:16</p> <p>CIVIL [1] - 20:23</p> <p>CIVIL [1] - 21:7</p> <p>CLAIM [3] - 41:25, 73:12, 83:6</p> <p>CLAIMED [1] - 79:7</p> <p>CLAIMING [1] - 70:2</p> <p>CLAIMS [5] - 14:14, 33:11, 69:24, 79:5, 91:5</p> <p>CLARIFIED [1] - 3:8</p> <p>CLASS [1] - 38:7</p> <p>CLAUSES [1] - 23:10</p> <p>CLAYTON [4] - 10:10, 11:17, 65:16, 69:2</p> <p>CLEAN [3] - 52:10, 80:15</p> <p>CLEAR [13] - 4:23, 14:12, 17:21, 18:10, 36:5, 36:25, 49:25, 53:21, 56:5, 64:22, 82:17, 87:19</p> <p>CLEARLY [2] - 65:22, 74:25</p> <p>CLERK [2] - 55:18, 87:8</p> <p>CLICK [1] - 12:10</p> <p>CLIENT [1] - 95:17</p> <p>CLOSE [6] - 3:12, 10:3, 33:20, 68:12, 81:23, 84:9</p> <p>CLOSED [1] - 46:9</p> <p>CLOSEST [1] - 50:4</p> <p>CLOSING [1] - 32:18</p> <p>CLOSINGS [1] - 3:5</p> <p>CLOSURES [1] - 48:25</p> <p>COAKLEY [1] - 1:9</p> <p>COBB [2] - 41:19, 41:22</p> <p>COHESION [2] - 15:8, 22:9</p> <p>COHESIVE [2] - 45:10, 45:12</p> <p>COHESIVELY [1] - 5:11</p> <p>COLLEGE [1] - 94:15</p> <p>COLLINGWOOD [1] - 49:24</p> <p>COLOR [4] - 58:1, 61:12, 86:16, 86:25</p>	<p>COMBINATION [2] - 5:18, 7:13</p> <p>COMBINE [1] - 17:15</p> <p>COMBINED [1] - 31:17</p> <p>COMBINES [1] - 41:16</p> <p>COMFORT [2] - 17:13, 17:19</p> <p>COMFORTABLE [1] - 17:22</p> <p>COMING [4] - 37:24, 49:8, 58:25, 62:24</p> <p>COMMAND [1] - 4:23</p> <p>COMMEND [1] - 96:17</p> <p>COMMENTS [1] - 62:4</p> <p>COMMERCIAL [1] - 11:10</p> <p>COMMISSION [3] - 8:2, 11:4, 62:10</p> <p>COMMISSIONER [1] - 76:9</p> <p>COMMISSIONS [1] - 62:5</p> <p>COMMON [5] - 11:9, 13:1, 52:5, 66:5, 71:3</p> <p>COMMONALITIES [1] - 12:4</p> <p>COMMUNITIES [19] - 7:2, 8:16, 10:3, 10:5, 10:8, 10:13, 10:21, 10:24, 11:23, 12:3, 12:25, 41:25, 52:4, 52:13, 52:19, 52:21, 65:16, 67:17, 81:10</p> <p>COMMUNITY [14] - 51:19, 51:23, 52:2, 52:9, 52:14, 54:14, 54:20, 64:14, 69:16, 70:11, 75:17, 75:23, 80:19, 80:21</p> <p>COMPACT [12] - 10:2, 10:19, 11:14, 11:19, 11:22, 12:17, 40:11, 41:2, 45:2, 65:4, 69:16, 70:11</p> <p>COMPACTNESS [8] - 8:1, 10:16, 11:16, 11:21, 12:5, 42:25, 60:5, 63:1</p> <p>COMPARABLE [2] - 6:18, 7:24</p> <p>COMPARATOR [1] - 36:15</p> <p>COMPARING [1] - 43:12</p> <p>COMPARISON [2] - 36:11, 43:15</p> <p>COMPLAINTS [1] - 73:23</p> <p>COMPLETELY [2] - 7:8, 85:2</p> <p>COMPLEX [2] - 5:4, 22:21</p> <p>COMPLEXITIES [2] - 28:7, 28:8</p> <p>COMPLIANCE [2] - 37:22, 65:22</p> <p>COMPLICATED [1] - 42:12</p> <p>COMPLY [4] - 56:6, 59:11, 66:9, 81:17</p> <p>COMPREHENSIVE [1] - 92:10</p> <p>COMPRISE [2] - 36:18, 45:3</p> <p>COMPROMISE [1] - 69:7</p> <p>COMPROMISED [2] - 61:6, 66:17</p> <p>CONCEDES [1] - 12:16</p> <p>CONCENTRATED [3] - 7:6, 26:9, 90:4</p> <p>CONCEPT [1] - 69:1</p> <p>CONCERN [5] - 17:21, 26:22, 85:2, 86:1, 89:14</p> <p>CONCERNED [1] - 45:8</p> <p>CONCERNS [2] - 33:22, 51:11</p> <p>CONCLUDE [2] - 17:17, 43:25</p> <p>CONCLUDED [1] - 97:2</p> <p>CONCLUSION [5] - 40:10, 40:15, 43:7, 86:24, 94:19</p> <p>CONCLUSIONS [2] - 3:23, 47:18</p> <p>CONCRETE [1] - 27:25</p> <p>CONCURRENCE [1] - 89:12</p>
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<p>CONDITIONS [3] - 5:14, 88:5, 90:17 CONDUCT [3] - 56:15, 84:24, 93:15 CONDUCTED [1] - 15:13 CONFIDENCE [2] - 6:2, 28:12 CONFIGURATION [2] - 41:22, 65:25 CONFIGURED [6] - 5:8, 6:13, 8:7, 9:16, 65:7, 90:3 CONFIRMED [1] - 8:6 CONFIRMS [1] - 20:15 CONFLATING [1] - 37:4 CONFLICT [1] - 85:4 CONFUSED [2] - 94:2, 94:13 CONGRESS [1] - 83:12 CONGRESS'S [1] - 4:23 CONGRESSIONAL [10] - 35:24, 36:4, 36:21, 39:3, 40:6, 40:20, 42:18, 50:19, 55:11, 79:12 CONGRESSWOMAN [1] - 83:20 CONGRESSWOMAN [5] - 35:25, 37:9, 83:13, 83:16, 83:19 CONNECT [1] - 43:2 CONNECTED [4] - 10:4, 10:5, 10:14, 74:1 CONNECTING [4] - 12:3, 12:4, 63:18, 67:15 CONNECTION [2] - 41:24, 73:17 CONNECTIONS [4] - 10:8, 10:21, 11:24, 12:23 CONNECTS [1] - 13:3 CONSCIOUS [9] - 18:24, 20:11, 60:14, 65:21, 66:12, 68:14, 76:19, 76:21 CONSCIOUSNESS [4] - 65:1, 66:7, 69:4 CONSIDER [5] - 27:4, 61:20, 82:19, 84:21, 88:1 CONSIDERATION [5] - 7:23, 13:13, 66:1, 84:18, 84:19 CONSIDERATIONS [4] - 6:22, 13:25, 61:6, 81:11 CONSIDERED [8] - 8:10, 8:16, 8:21, 10:5, 10:13, 10:25, 13:25, 77:10 CONSIDERING [3] - 57:22, 69:19, 86:15 CONSISTENT [15] - 5:9, 6:14, 7:21, 8:9, 14:16, 21:11, 40:13, 44:14, 62:7, 62:9, 62:11, 63:13, 63:14, 64:7, 68:20 CONSISTENTLY [7] - 16:1, 20:19, 21:6, 43:11, 45:15, 61:23, 76:4 CONSISTS [1] - 14:19 CONSOLIDATED [1] - 42:18 CONSTITUTION [2] - 84:17, 85:5 CONSTITUTION'S [1] - 85:18 CONTEST [2] - 13:11 CONTESTED [1] - 16:3 CONTESTS [1] - 22:8 CONTEXT [8] - 17:12, 17:13, 20:12, 21:20, 22:2, 22:12, 73:21, 73:22 CONTINUATION [1] - 72:25 CONTINUE [6] - 25:6, 33:7, 48:1, 50:6, 55:5, 57:24 CONTINUED [2] - 32:19, 55:21</p>	<p>CONTINUES [1] - 14:24 CONTINUING [2] - 7:10, 55:1 CONTRAST [3] - 35:8, 35:13, 59:23 CONTRIBUTES [1] - 28:13 CONTROL [1] - 8:23 CONTROLLED [1] - 35:19 CONYERS [1] - 10:22 COOPER [38] - 7:4, 7:16, 8:9, 9:5, 9:12, 9:24, 10:2, 10:11, 10:17, 10:23, 11:13, 11:14, 11:19, 12:2, 12:17, 12:22, 13:20, 13:22, 14:12, 16:23, 41:7, 41:18, 41:21, 43:22, 59:5, 59:8, 61:14, 61:25, 62:11, 62:16, 63:6, 63:24, 64:3, 65:12, 67:23, 69:15, 87:17, 87:18 COOPER'S [19] - 7:20, 7:24, 8:24, 9:21, 14:9, 14:16, 14:18, 40:9, 40:20, 61:13, 63:11, 63:17, 64:7, 66:3, 66:20, 69:20, 83:15, 87:25, 88:1 CORRECT [2] - 69:25, 98:7 CORRECTLY [1] - 76:20 CORRELATED [1] - 25:15 CORRIDOR [1] - 62:3 COUDRIET [2] - 1:24, 98:15 COUNSEL [2] - 73:1, 73:11 COUNT [1] - 83:13 COUNTED [1] - 84:7 COUNTIES [14] - 8:15, 11:1, 12:4, 13:3, 61:22, 62:8, 62:13, 63:4, 63:8, 64:3, 64:16, 68:1, 81:21, 82:8 COUNTRY [2] - 88:25, 90:8 COUNTY [12] - 8:1, 9:15, 11:2, 11:3, 11:4, 12:20, 24:14, 62:10, 63:13, 63:24, 64:4, 68:3 COUNTY [23] - 9:1, 10:10, 10:12, 10:17, 11:17, 18:22, 24:15, 36:4, 37:18, 41:19, 41:22, 51:13, 63:10, 68:1, 68:9, 69:2, 69:3, 70:9, 74:13, 76:17, 80:18, 80:20, 89:18 COUNTY'S [1] - 38:10 COUPLE [4] - 32:24, 33:1, 42:19 COURSE [2] - 53:15, 71:15 COURT [32] - 1:1, 1:25, 1:25, 3:1, 3:3, 3:11, 3:14, 3:17, 3:22, 4:2, 4:4, 4:7, 4:13, 4:16, 12:10, 12:14, 14:2, 14:6, 32:5, 32:16, 32:21, 55:13, 55:20, 55:23, 87:5, 87:20, 88:1, 88:10, 94:24, 95:1, 98:3, 98:15 COURT [72] - 4:18, 5:1, 9:4, 9:10, 9:17, 9:21, 9:22, 12:8, 13:10, 14:7, 15:7, 18:11, 23:12, 23:13, 29:2, 29:7, 32:3, 32:4, 32:14, 33:6, 33:9, 33:12, 33:22, 37:12, 37:25, 38:8, 38:14, 38:19, 39:24, 45:5, 46:18, 46:21, 46:22, 47:13, 51:11, 51:24, 52:16, 53:15, 55:10, 56:12, 56:21, 57:6, 59:2, 60:10, 61:2, 64:21, 64:25, 70:22, 71:9, 71:18, 72:17, 73:4, 73:24, 75:7, 76:15, 77:20, 78:10, 82:18, 82:19, 84:12, 84:14, 84:19, 86:2, 86:15, 86:23, 87:11, 87:13, 88:8, 88:20, 93:14, 93:17,</p>	<p>94:22 COURT [10] - 4:18, 24:16, 38:4, 54:9, 66:14, 70:21, 70:25, 71:21, 77:10, 89:6 COURT'S [9] - 13:14, 53:16, 59:12, 60:17, 60:22, 60:23, 71:13, 74:19, 79:18 COURTROOM [3] - 4:12, 28:9, 55:2 COURTS [5] - 4:25, 9:2, 56:14, 70:23, 94:9 COWETA [1] - 67:25 CREATE [8] - 26:21, 62:15, 63:5, 63:21, 64:6, 65:13, 67:14, 68:25 CREATED [2] - 43:21, 68:6 CREATES [1] - 18:19 CREATING [2] - 62:12, 69:22 CREATION [6] - 40:12, 65:18, 68:7, 68:21, 70:5, 81:9 CREATIVE [1] - 37:5 CREDIBILITY [2] - 9:22, 14:9 CREDIBLE [4] - 8:24, 13:15, 40:5, 46:14 CREDIBLY [2] - 6:20, 44:25 CRIMINAL [1] - 25:10 CRITERIA [1] - 41:5 CRITERION [1] - 61:5 CRITICAL [2] - 47:10, 59:12 CROPPING [1] - 29:23 CROSS [3] - 9:7, 40:8, 66:12 CROSS-EXAMINATION [1] - 40:8 CROSS-EXAMINED [1] - 9:7 CROSSES [1] - 53:7 CRR [2] - 1:24, 98:15 CRY [1] - 51:5 CUE [2] - 21:17, 21:18 CURRENT [3] - 51:21, 58:21, 92:2 CUT [1] - 68:2 CUTOFF [1] - 46:11 CUTS [2] - 48:24, 64:2 CUTTING [2] - 81:21, 82:7</p>
D		
<p>DANIEL [1] - 2:16 DARK [1] - 50:14 DATA [13] - 10:6, 11:1, 20:12, 22:2, 22:12, 25:22, 26:5, 34:9, 47:5, 47:7, 47:11, 62:2, 74:25 DAWGS [1] - 97:1 DAY [1] - 1:4 DAYS [4] - 23:9, 42:19, 56:13, 58:5 DE [6] - 37:3, 37:23, 38:4, 71:1, 82:18, 84:9 DEALING [1] - 89:15 DECADE [1] - 41:13 DECADES [2] - 4:25, 20:21 DECEMBER [1] - 33:1 DECIDE [1] - 95:10 DECIDED [2] - 37:8, 78:19 DECISION [7] - 61:7, 74:13, 95:14, 95:19, 95:21, 96:1, 96:3</p>		

<p>DECISIONS [4] - 6:24, 12:19, 13:23, 74:24</p> <p>DECK [3] - 87:13, 87:15</p> <p>DECLINE [1] - 7:14</p> <p>DEEMED [1] - 49:10</p> <p>DEEMS [1] - 46:11</p> <p>DEEP [1] - 8:17</p> <p>DEEPER [1] - 60:19</p> <p>DEFEAT [2] - 45:15, 95:3</p> <p>DEFEATED [1] - 16:6</p> <p>DEFENDANT [2] - 1:8, 2:13</p> <p>DEFENDANTS [29] - 19:10, 33:16, 34:4, 34:9, 34:15, 35:24, 36:8, 37:15, 40:16, 40:23, 41:15, 42:13, 46:3, 46:6, 47:1, 47:13, 48:2, 50:12, 50:18, 50:22, 52:3, 52:11, 91:18, 92:1, 93:3, 93:17, 94:1, 94:11, 94:13</p> <p>DEFENDANTS [2] - 1:13, 1:18</p> <p>DEFENDANTS' [14] - 8:5, 9:9, 10:18, 11:22, 12:16, 25:23, 33:25, 37:2, 38:24, 39:1, 40:9, 44:24, 46:12, 53:9</p> <p>DEFENSE [10] - 13:17, 14:10, 18:2, 18:6, 18:11, 19:10, 19:14, 24:5, 29:3, 86:21</p> <p>DEFENSE'S [4] - 14:8, 14:13, 19:24, 22:13</p> <p>DEFINED [1] - 74:16</p> <p>DELEGATION [1] - 35:25</p> <p>DELIBERATIVE [1] - 81:13</p> <p>DELUSION [1] - 31:4</p> <p>DEMANDED [1] - 42:5</p> <p>DEMANDS [2] - 44:22, 84:19</p> <p>DEMOCRAT [2] - 75:10, 75:11</p> <p>DEMOCRATIC [1] - 83:22</p> <p>DEMOCRATIC [9] - 19:20, 22:7, 24:22, 38:17, 76:1, 79:7, 80:4, 83:1, 84:7</p> <p>DEMOCRATS [15] - 20:6, 21:13, 48:4, 58:23, 74:11, 79:6, 81:14, 83:9, 85:23, 91:1, 91:2, 91:12, 93:6</p> <p>DEMOGRAPHIC [5] - 7:4, 7:7, 7:14, 12:1, 35:4</p> <p>DEMOGRAPHICS [2] - 8:18, 38:14</p> <p>DEMONSTRATE [5] - 47:2, 66:24, 67:3, 85:17, 88:5</p> <p>DEMONSTRATED [4] - 17:4, 38:1, 68:24, 78:10</p> <p>DEMONSTRATES [5] - 14:23, 27:16, 49:19, 50:25, 75:5</p> <p>DEMONSTRATING [1] - 7:5</p> <p>DENIES [2] - 78:17, 86:10</p> <p>DENISE [1] - 2:6</p> <p>DENYING [1] - 56:18</p> <p>DEPICTS [1] - 87:17</p> <p>DEPOSITION [1] - 72:20</p> <p>DEPRIVED [2] - 52:13, 52:14</p> <p>DEPUTY [2] - 55:18, 87:8</p> <p>DESCEND [1] - 85:8</p> <p>DESCRIBED [2] - 15:16, 31:13</p> <p>DESCRIBES [1] - 66:11</p>	<p>DESCRIBING [2] - 13:6, 22:4</p> <p>DESCRIPTION [1] - 31:11</p> <p>DESERTS [2] - 52:9, 80:15</p> <p>DESIGN [5] - 62:23, 65:14, 66:18, 71:20, 72:15</p> <p>DESIGNATIONS [1] - 72:20</p> <p>DESIGNED [4] - 57:25, 64:5, 64:10, 65:5</p> <p>DESPITE [4] - 5:11, 12:15, 23:16, 30:6</p> <p>DETAIL [1] - 47:24</p> <p>DETAILED [6] - 7:4, 8:9, 8:20, 15:17, 23:23, 39:14</p> <p>DETERMINATION [1] - 5:15</p> <p>DETERMINE [2] - 48:7, 82:22</p> <p>DETERMINING [1] - 33:9</p> <p>DETERMINISM [1] - 20:5</p> <p>DETRIMENT [1] - 43:5</p> <p>DEVELOPMENT [1] - 7:9</p> <p>DEVIATION [4] - 8:1, 8:12, 10:4, 11:15</p> <p>DEVIATIONS [1] - 82:8</p> <p>DEVOTED [1] - 44:2</p> <p>DIANE [1] - 2:15</p> <p>DIANE [3] - 11:8, 51:12, 54:13</p> <p>DIFFERENCE [3] - 28:14, 62:18, 78:23</p> <p>DIFFERENCES [1] - 42:22</p> <p>DIFFERENT [29] - 12:24, 12:25, 23:13, 33:19, 34:20, 35:4, 37:4, 47:7, 56:25, 57:5, 59:24, 60:18, 62:19, 63:16, 67:11, 69:12, 72:9, 75:21, 83:25, 84:4, 84:5, 86:5, 90:9, 90:10, 90:11, 91:8, 91:10</p> <p>DIFFICULT [10] - 25:14, 28:11, 30:25, 56:5, 58:5, 84:15, 95:10, 95:11, 95:12</p> <p>DIG [1] - 71:21</p> <p>DIGIUSEPPE [1] - 2:10</p> <p>DILAPIDATED [1] - 52:7</p> <p>DILUTE [7] - 24:23, 28:18, 31:17, 35:21, 53:3, 53:4, 81:25</p> <p>DILUTED [2] - 83:6, 86:24</p> <p>DILUTING [1] - 55:8</p> <p>DILUTION [10] - 4:22, 5:15, 9:20, 19:11, 42:3, 53:6, 53:8, 53:9, 57:3, 58:1</p> <p>DIMINUTION [1] - 74:17</p> <p>DIRECT [2] - 30:9, 67:13</p> <p>DIRECTION [1] - 28:5</p> <p>DIRECTLY [5] - 22:3, 25:17, 31:12, 78:12, 82:22</p> <p>DIRECTOR [1] - 51:14</p> <p>DISADVANTAGES [1] - 26:16</p> <p>DISAGREE [4] - 14:16, 23:2, 46:5, 73:15</p> <p>DISAPPEAR [3] - 58:23, 77:21, 90:25</p> <p>DISAPPEARS [2] - 58:21, 91:6</p> <p>DISCREDITED [1] - 19:18</p> <p>DISCRIMINATE [1] - 24:4</p> <p>DISCRIMINATION [19] - 23:23, 25:12, 26:17, 30:10, 38:16, 46:2, 46:10, 48:16, 50:7, 51:9, 58:1, 70:15, 70:18, 72:7, 72:16, 72:18, 73:6, 89:19, 94:17</p> <p>DISCRIMINATORY [8] - 4:24, 24:12,</p>	<p>24:18, 27:1, 29:21, 48:20, 77:16, 77:17</p> <p>DISCUSS [4] - 40:3, 57:4, 60:23, 64:19</p> <p>DISCUSSED [10] - 11:9, 12:17, 12:18, 12:19, 28:8, 39:6, 51:4, 63:6, 67:23, 68:8</p> <p>DISCUSSING [1] - 56:12</p> <p>DISCUSSION [4] - 36:17, 74:3, 80:11, 91:21</p> <p>DISENFRANCHISE [1] - 24:23</p> <p>DISENTANGLE [1] - 82:2</p> <p>DISENTANGLED [1] - 82:25</p> <p>DISPARATE [5] - 43:2, 64:10, 64:17, 78:2, 93:1</p> <p>DISPARATELY [1] - 29:22</p> <p>DISPARITIES [9] - 25:8, 25:10, 25:13, 28:1, 30:8, 30:22, 49:23, 77:19, 91:23</p> <p>DISPARITY [2] - 25:24, 78:9</p> <p>DISPROPORTIONATELY [3] - 25:5, 49:14, 50:9</p> <p>DISPUTE [8] - 33:18, 40:4, 40:5, 40:14, 44:19, 44:25, 45:19, 53:2</p> <p>DISPUTED [2] - 8:5, 40:9</p> <p>DISPUTES [3] - 7:6, 11:21, 15:10</p> <p>DISREGARD [1] - 39:21</p> <p>DISREGARDING [1] - 40:23</p> <p>DISTANCE [1] - 11:3</p> <p>DISTINCTION [1] - 75:18</p> <p>DISTORT [2] - 9:11, 14:21</p> <p>DISTRICT [74] - 5:19, 9:5, 10:2, 10:3, 10:5, 10:16, 10:19, 10:22, 10:24, 11:5, 11:13, 11:19, 11:22, 12:18, 12:21, 12:23, 12:25, 13:2, 13:21, 16:7, 16:15, 17:14, 23:15, 25:19, 27:17, 31:3, 31:17, 32:12, 35:25, 36:5, 36:7, 37:9, 37:13, 40:12, 41:7, 41:11, 41:20, 42:4, 42:8, 44:21, 44:23, 52:19, 52:25, 60:5, 63:21, 64:1, 64:4, 64:17, 65:12, 66:12, 66:21, 66:25, 67:14, 67:15, 67:16, 68:1, 68:8, 69:8, 69:20, 69:22, 69:23, 70:2, 71:21, 79:25, 83:2, 83:13, 83:16, 83:18, 83:19, 83:21, 87:17, 90:3</p> <p>DISTRICT [39] - 10:1, 10:11, 10:23, 11:12, 11:20, 12:2, 12:17, 12:21, 36:4, 37:10, 40:25, 41:1, 51:16, 51:17, 51:20, 63:25, 64:4, 64:6, 64:9, 64:14, 64:15, 65:7, 66:20, 66:25, 67:23, 68:2, 68:4, 68:6, 68:7, 68:19, 68:25, 69:17, 69:18, 70:2, 70:3, 70:4, 70:5, 83:17</p> <p>DISTRICT [6] - 1:1, 1:2, 1:21, 1:25, 98:3, 98:4</p> <p>DISTRICT-BASED [1] - 23:15</p> <p>DISTRICTED [1] - 35:21</p> <p>DISTRICTING [12] - 5:9, 6:14, 6:21, 7:21, 14:17, 40:13, 40:24, 41:5, 43:9, 44:12, 67:9, 69:9</p> <p>DISTRICTS [93] - 5:8, 5:13, 6:13, 7:17, 7:21, 8:4, 8:7, 8:13, 8:23, 9:16, 9:24, 11:2, 13:25, 15:12, 16:19, 16:22, 17:12, 17:23, 23:16, 23:17, 28:18,</p>
---	--	---

<p>29:6, 29:12, 29:13, 29:16, 29:18, 30:3, 30:11, 30:16, 30:20, 33:7, 35:22, 36:12, 36:15, 36:21, 36:22, 36:23, 38:10, 39:3, 39:7, 41:1, 41:16, 42:12, 42:24, 42:25, 43:1, 43:12, 43:13, 44:6, 44:9, 44:10, 44:15, 45:4, 45:16, 58:19, 59:5, 61:21, 61:24, 62:12, 62:13, 62:20, 62:21, 62:22, 63:3, 63:15, 63:22, 64:13, 64:15, 65:5, 65:10, 65:11, 65:14, 65:17, 65:19, 65:24, 66:4, 66:8, 66:23, 68:12, 68:17, 68:18, 68:22, 68:24, 69:2, 81:12, 81:17, 81:23, 82:6, 82:21, 84:1, 87:24</p> <p>DIVERGENCE [1] - 44:15</p> <p>DIVERSIFICATION [1] - 7:9</p> <p>DIVIDE [1] - 92:14</p> <p>DIVIDED [1] - 64:14</p> <p>DIVIDING [1] - 31:21</p> <p>DIVISION [1] - 1:2</p> <p>DIVISION [4] - 21:10, 21:12, 21:15, 32:1</p> <p>DIVISIONS [1] - 50:16</p> <p>DIXIT [1] - 2:9</p> <p>DOCKET [3] - 1:6, 1:11, 1:16</p> <p>DONALD [1] - 2:16</p> <p>DONE [5] - 15:14, 26:13, 50:25, 95:12, 96:11</p> <p>DOT [1] - 61:19</p> <p>DOTS [1] - 61:18</p> <p>DOUBT [4] - 5:3, 5:4, 22:20</p> <p>DOWN [11] - 11:25, 13:9, 24:15, 39:10, 68:9, 72:6, 72:10, 85:8, 88:22, 93:17, 98:7</p> <p>DR [67] - 11:6, 11:8, 15:13, 15:17, 16:12, 18:16, 19:17, 20:18, 21:5, 21:9, 21:15, 21:17, 21:20, 21:23, 21:25, 22:3, 23:23, 24:8, 24:11, 24:17, 24:19, 25:11, 25:13, 25:17, 25:25, 26:15, 26:20, 27:11, 27:16, 27:24, 28:3, 28:10, 47:5, 47:6, 47:9, 47:15, 47:19, 47:23, 48:17, 49:7, 49:24, 51:12, 54:25, 57:18, 74:21, 74:22, 74:25, 75:3, 75:10, 75:19, 75:25, 76:7, 77:24, 86:5, 90:15</p> <p>DRAM [1] - 38:25</p> <p>DRAMATICALLY [1] - 57:5</p> <p>DRASTICALLY [1] - 35:4</p> <p>DRAW [9] - 6:11, 7:20, 13:23, 29:6, 42:4, 59:4, 60:4, 87:18, 90:2</p> <p>DRAWER [9] - 6:20, 52:17, 54:18, 61:9, 61:17, 63:4, 66:9, 66:16, 93:10</p> <p>DRAWER'S [2] - 61:5, 69:7</p> <p>DRAWERS' [1] - 39:20</p> <p>DRAWING [15] - 8:18, 9:11, 12:19, 35:22, 41:11, 43:23, 52:19, 52:25, 58:18, 61:17, 62:2, 62:3, 63:2, 63:12, 69:8</p> <p>DRAWN [17] - 5:8, 6:14, 8:23, 8:25, 15:12, 16:8, 16:15, 16:22, 17:7, 17:12, 17:23, 23:17, 25:20, 44:1, 58:19, 65:19, 69:20</p>	<p>DRAWS [3] - 29:13, 40:25, 44:15</p> <p>DREAMED [1] - 34:18</p> <p>DREW [15] - 10:2, 10:17, 10:23, 11:16, 11:19, 12:6, 13:21, 41:8, 58:12, 59:5, 59:8, 62:25, 67:13, 67:16</p> <p>DRIVE [1] - 21:22</p> <p>DRIVEN [2] - 17:11, 18:8</p> <p>DRIVING [2] - 11:25, 65:25</p> <p>DROP [2] - 73:23, 74:6</p> <p>DROPPED [1] - 35:6</p> <p>DUBIOUS [1] - 54:1</p> <p>DUCKS [1] - 53:20</p> <p>DUE [3] - 23:18, 29:14, 31:5</p> <p>DURING [6] - 31:12, 33:11, 39:16, 46:2, 46:17, 88:21</p> <p>DUTY [1] - 56:13</p> <p>DYNAMIC [3] - 5:21, 6:3, 16:9</p>	<p>22:4, 22:9, 23:15, 24:14, 29:11, 29:20, 31:3, 32:13, 35:20, 35:21, 75:3, 78:13, 90:10</p> <p>ELECTORAL [6] - 16:20, 35:12, 35:15, 72:14, 78:17, 86:10</p> <p>ELECTORATE [2] - 50:16, 75:6</p> <p>ELEMENT [2] - 65:10, 71:8</p> <p>ELEMENTS [2] - 6:4, 33:14</p> <p>ELIGIBLE [3] - 45:3, 49:3, 77:7</p> <p>ELIMINATE [1] - 37:17</p> <p>ELONGATE [3] - 65:12, 66:21, 68:18</p> <p>ELONGATED [2] - 64:9, 81:17</p> <p>ELONGATES [1] - 67:24</p> <p>ELONGATING [4] - 44:8, 63:22, 68:8, 69:1</p> <p>ELONGATION [7] - 44:10, 44:13, 44:14, 44:19, 64:13, 65:9, 68:23</p> <p>ELUDED [1] - 56:3</p> <p>EMANUEL [1] - 9:1</p> <p>EMBLEMATIC [1] - 90:18</p> <p>EMPHASIS [2] - 37:3, 44:10</p> <p>EMPHASIZE [1] - 39:2</p> <p>EMPLOY [1] - 43:14</p> <p>EMPLOYED [1] - 44:17</p> <p>EMPLOYMENT [3] - 25:9, 30:9, 50:7</p> <p>ENABLE [2] - 65:18, 66:24</p> <p>ENABLED [1] - 68:7</p> <p>ENACTED [19] - 6:18, 7:25, 11:2, 32:25, 34:19, 41:2, 41:18, 41:22, 41:24, 42:25, 43:13, 55:11, 60:6, 62:18, 65:9, 66:19, 81:12, 81:17, 81:20</p> <p>ENCOURAGE [1] - 28:15</p> <p>END [17] - 7:12, 15:22, 21:7, 27:18, 30:17, 31:8, 40:8, 41:23, 44:24, 49:15, 56:1, 56:2, 72:10, 77:17, 82:15, 85:20, 92:5</p> <p>ENDANGERING [1] - 86:3</p> <p>ENDED [1] - 46:10</p> <p>ENDPOINT [3] - 58:13, 84:22, 89:8</p> <p>ENDS [6] - 31:10, 31:20, 31:22, 31:25, 32:2, 60:2</p> <p>ENERGIZE [1] - 21:14</p> <p>ENERGY [1] - 44:2</p> <p>ENGAGED [1] - 51:19</p> <p>ENHANCE [2] - 24:3, 48:16</p> <p>ENJOIN [1] - 55:10</p> <p>ENSURE [4] - 55:6, 57:14, 57:23</p> <p>ENSURED [1] - 11:16</p> <p>ENSURES [1] - 31:16</p> <p>ENTER [2] - 60:10, 75:6</p> <p>ENTIRE [1] - 33:6</p> <p>ENTIRELY [4] - 33:19, 42:21, 44:14, 74:15</p> <p>ENTITLED [1] - 55:3</p> <p>EQUAL [15] - 51:5, 54:24, 56:18, 57:16, 58:14, 59:18, 71:4, 71:10, 72:1, 82:22, 84:8, 84:13, 85:3, 85:17, 86:10</p> <p>EQUALITY [5] - 20:23, 21:3, 31:25, 34:17, 57:14</p>
E		
	<p>EAR [1] - 31:7</p> <p>EARLY [2] - 48:24, 77:5</p> <p>EASIER [3] - 56:10, 88:16, 96:17</p> <p>EAST [1] - 10:25</p> <p>EAST [2] - 64:2, 64:11</p> <p>EAST-WEST [1] - 10:25</p> <p>EASTERN [4] - 7:11, 15:22, 27:18, 30:17</p> <p>EASTERN [3] - 16:18, 45:1, 51:12</p> <p>EASY [2] - 4:21, 72:22</p> <p>ECHOED [2] - 46:3, 49:7</p> <p>ED [1] - 2:5</p> <p>EDITS [1] - 3:10</p> <p>EDUCATION [5] - 13:8, 25:9, 26:4, 30:8, 50:7</p> <p>EDUCATIONAL [4] - 26:6, 26:10, 77:25, 78:1</p> <p>EERILY [1] - 49:16</p> <p>EFFECT [9] - 22:1, 31:8, 62:16, 62:18, 63:9, 95:8, 95:22, 95:24, 96:7</p> <p>EFFECTIVE [1] - 24:24</p> <p>EFFECTS [3] - 29:22, 50:6, 77:16</p> <p>EFFICIENCY [1] - 42:17</p> <p>EFFORT [4] - 47:14, 53:1, 54:4, 81:16</p> <p>EFFORTS [8] - 4:19, 23:25, 28:19, 30:6, 63:7, 66:9, 71:13</p> <p>EGREGIOUS [1] - 24:11</p> <p>EITHER [7] - 24:23, 36:3, 43:15, 46:24, 49:10, 62:7, 70:13</p> <p>ELECT [5] - 15:19, 16:11, 16:16, 17:8, 27:19</p> <p>ELECTED [18] - 23:8, 25:2, 27:12, 27:24, 34:22, 35:18, 51:10, 76:8, 79:25, 80:22, 82:24, 83:2, 83:9, 84:1, 84:2, 91:7, 91:9, 93:7</p> <p>ELECTION [22] - 22:6, 26:18, 30:1, 30:2, 33:6, 34:1, 34:14, 49:18, 55:6, 72:18, 73:16, 74:5, 75:24, 76:2, 76:5, 77:1, 78:4, 79:14, 79:19, 82:23, 85:14</p> <p>ELECTIONS [16] - 15:20, 15:21, 19:19,</p>	

<p>EQUALLY [20] - 17:18, 17:22, 23:4, 23:14, 29:12, 29:16, 29:20, 29:24, 30:3, 30:11, 30:13, 30:19, 31:1, 34:2, 56:9, 57:2, 57:17, 80:7, 83:10, 85:14</p> <p>EQUITABLY [1] - 88:6</p> <p>EQUIVALENT [1] - 33:2</p> <p>ERADICATION [1] - 51:8</p> <p>ERGO [1] - 19:22</p> <p>ESPECIALLY [3] - 27:9, 30:16</p> <p>ESQ [23] - 2:3, 2:4, 2:4, 2:5, 2:5, 2:6, 2:6, 2:7, 2:7, 2:8, 2:8, 2:9, 2:9, 2:10, 2:10, 2:11, 2:11, 2:12, 2:14, 2:15, 2:15, 2:16, 2:16</p> <p>ESSELSTYN [4] - 43:22, 65:11, 67:11, 67:22</p> <p>ESSELSTYN'S [11] - 42:11, 42:23, 42:24, 43:1, 43:5, 44:5, 44:8, 67:6, 68:2, 68:17, 87:24</p> <p>ESSENTIALLY [3] - 7:17, 35:9, 72:5</p> <p>ESTABLISH [6] - 47:8, 89:6, 89:22, 90:23, 93:13, 93:14</p> <p>ESTABLISHED [2] - 17:4, 93:24</p> <p>ET [5] - 1:5, 1:10, 1:12, 1:14, 1:17</p> <p>EVALUATE [2] - 64:21, 82:19</p> <p>EVALUATING [3] - 56:22, 76:19, 83:21</p> <p>EVANS [4] - 11:8, 51:12, 54:13, 54:25</p> <p>EVENT [2] - 47:15, 49:9</p> <p>EVERYWHERE [2] - 90:16, 92:17</p> <p>EVIDENCE [51] - 5:5, 5:22, 5:25, 6:25, 8:6, 8:8, 12:23, 13:19, 14:12, 14:23, 15:10, 18:12, 20:15, 22:23, 23:18, 24:7, 25:7, 26:19, 27:4, 27:21, 29:3, 30:7, 39:3, 39:17, 39:25, 45:24, 50:11, 50:12, 50:20, 54:10, 54:11, 56:7, 61:23, 67:4, 69:12, 74:9, 74:20, 75:7, 76:6, 76:10, 76:16, 77:22, 77:24, 78:25, 79:4, 80:13, 80:22, 82:25, 86:13, 86:22, 86:23</p> <p>EVIDENTIARY [1] - 60:2</p> <p>EVOLVED [1] - 24:19</p> <p>EXACT [3] - 6:11, 49:12, 77:12</p> <p>EXACTLY [7] - 5:22, 6:15, 24:9, 50:14, 50:25, 92:20, 96:2</p> <p>EXAMINATION [2] - 17:13, 40:8</p> <p>EXAMINED [3] - 9:7, 45:13, 50:2</p> <p>EXAMINING [1] - 47:16</p> <p>EXAMPLE [6] - 49:1, 65:3, 77:1, 80:2, 81:1, 81:3</p> <p>EXAMPLES [3] - 27:3, 79:14, 81:20</p> <p>EXCESSIVE [3] - 56:17, 78:16, 86:9</p> <p>EXCLUDES [1] - 68:4</p> <p>EXEMPT [1] - 71:1</p> <p>EXERCISE [1] - 30:7</p> <p>EXHAUSTED [1] - 53:13</p> <p>EXHAUSTION [1] - 53:18</p> <p>EXHIBITS [1] - 73:9</p> <p>EXIST [5] - 5:11, 15:9, 28:2, 32:9, 74:16</p> <p>EXISTENCE [2] - 39:2, 67:2</p> <p>EXISTENT [1] - 69:5</p> <p>EXISTING [2] - 40:25, 44:8</p>	<p>EXISTS [2] - 15:11, 89:1</p> <p>EXPANSIVE [1] - 49:22</p> <p>EXPECTING [2] - 85:8, 85:9</p> <p>EXPEDIENT [2] - 53:3, 53:4</p> <p>EXPERIENCE [5] - 26:11, 41:8, 51:17, 61:15, 72:21</p> <p>EXPERIENCED [1] - 63:4</p> <p>EXPERIENCING [1] - 53:19</p> <p>EXPERT [13] - 8:5, 8:25, 9:9, 10:18, 11:22, 12:16, 14:13, 40:9, 40:18, 43:19, 44:18, 46:7, 47:8</p> <p>EXPERTS [3] - 43:18, 46:4, 50:4</p> <p>EXPLAIN [5] - 21:11, 22:11, 25:24, 47:20, 66:8</p> <p>EXPLAINED [9] - 21:9, 21:20, 21:23, 22:5, 27:3, 27:8, 47:2, 62:17, 75:10</p> <p>EXPLAINS [5] - 19:22, 20:16, 22:24, 47:17, 47:19</p> <p>EXPLANATION [4] - 18:14, 43:20, 65:24, 82:4</p> <p>EXPLANATIONS [2] - 66:3, 67:12</p> <p>EXTEND [2] - 39:1, 84:24</p> <p>EXTENSIVE [1] - 54:2</p> <p>EXTENSIVELY [1] - 23:24</p> <p>EXTENT [11] - 18:17, 36:8, 43:8, 46:15, 47:1, 47:9, 47:18, 79:19, 92:13, 92:16, 94:1</p> <p>EXTREMELY [3] - 45:10, 65:6, 81:22</p> <p>EYEBALLED [1] - 8:13</p>	<p>FAILS [3] - 44:21, 44:25, 88:25</p> <p>FAILURE [1] - 28:13</p> <p>FAIR [1] - 77:11</p> <p>FAIR [4] - 28:14, 28:21, 38:25, 55:4</p> <p>FAIRLY [1] - 95:25</p> <p>FAITH [1] - 30:23</p> <p>FAKE [1] - 78:25</p> <p>FALL [2] - 42:16, 42:24</p> <p>FALLEN [1] - 47:3</p> <p>FAMILIAR [3] - 10:12, 33:8, 46:3</p> <p>FAMILIARITY [1] - 67:17</p> <p>FANCY [1] - 39:13</p> <p>FAR [7] - 39:4, 39:7, 43:2, 45:8, 51:5, 82:12, 89:2</p> <p>FAR-FLUNG [1] - 43:2</p> <p>FAST [1] - 50:4</p> <p>FAVOR [1] - 71:16</p> <p>FAYETTE [7] - 9:1, 10:10, 24:15, 69:2, 80:18, 80:19, 80:20</p> <p>FEAR [1] - 26:21</p> <p>FEATURE [3] - 63:13, 63:14, 68:20</p> <p>FEDERAL [4] - 24:16, 56:14, 70:22, 70:25</p> <p>FEED [1] - 50:17</p> <p>FEIGN [1] - 37:19</p> <p>FELT [3] - 33:18, 52:1, 59:24</p> <p>FENCE [1] - 23:25</p> <p>FENIKA [2] - 51:24, 54:16</p> <p>FEW [3] - 13:24, 37:7, 53:14</p> <p>FEWER [2] - 29:6, 79:1</p> <p>FIELD [1] - 50:5</p> <p>FIFTH [1] - 77:19</p> <p>FIGHT [2] - 54:23, 55:6</p> <p>FIGHT [1] - 77:11</p> <p>FIGHTING [2] - 33:23, 43:3</p> <p>FILE [1] - 41:23</p> <p>FILED [3] - 32:25, 34:23, 42:2</p> <p>FINAL [1] - 91:17</p> <p>FINALLY [1] - 27:23</p> <p>FINE [2] - 3:20, 3:21</p> <p>FINGERS [1] - 88:18</p> <p>FINISH [1] - 14:3</p> <p>FINISHED [3] - 62:1, 62:2, 62:3</p> <p>FIRST [17] - 3:25, 4:10, 7:23, 23:21, 34:11, 34:23, 39:16, 39:23, 40:3, 61:14, 62:4, 78:18, 92:21, 95:2, 95:7, 95:21, 96:5</p> <p>FIT [1] - 87:13</p> <p>FITS [1] - 95:20</p> <p>FIVE [4] - 4:6, 39:2, 48:19, 55:17</p> <p>FIXATED [2] - 58:4, 58:8</p> <p>FIXATION [1] - 59:16</p> <p>FLEXIBILITY [1] - 81:8</p> <p>FLEXIBLE [1] - 6:13</p> <p>FLIP [1] - 31:18</p> <p>FLOW [1] - 26:16</p> <p>FLUNG [1] - 43:2</p> <p>FOCUS [10] - 5:7, 16:14, 16:18, 17:11, 17:16, 25:19, 27:15, 43:24, 71:8,</p>
F		
	<p>FABRIC [1] - 72:18</p> <p>FACE [1] - 50:9</p> <p>FACED [2] - 39:18, 84:20</p> <p>FACT [18] - 17:11, 18:11, 18:19, 19:19, 22:21, 23:16, 35:20, 40:24, 41:15, 45:9, 45:11, 47:19, 48:5, 53:8, 71:22, 89:21, 93:16, 93:23</p> <p>FACT-DRIVEN [1] - 17:11</p> <p>FACT-INTENSIVE [3] - 89:21, 93:16, 93:23</p> <p>FACTOR [7] - 8:21, 48:11, 50:21, 74:8, 77:19, 78:8, 92:8</p> <p>FACTOR [20] - 18:5, 23:20, 25:7, 26:19, 27:11, 27:23, 46:1, 46:15, 48:15, 49:23, 50:11, 50:20, 51:3, 51:10, 52:24, 60:20, 60:21, 76:23, 79:20, 80:8</p> <p>FACTORS [1] - 23:20</p> <p>FACTORS [12] - 17:25, 45:22, 57:1, 71:23, 71:25, 72:2, 79:20, 83:25, 84:12, 91:22, 92:10, 93:16</p> <p>FACTS [19] - 3:23, 5:4, 13:16, 13:19, 18:3, 32:9, 41:7, 45:14, 57:4, 57:5, 71:19, 85:2, 85:17, 86:2, 86:5, 89:7, 93:14, 94:19, 95:20</p> <p>FAIL [5] - 89:3, 89:4, 90:16, 93:3</p> <p>FAILED [4] - 27:19, 44:4, 46:6, 49:11</p> <p>FAILING [1] - 42:3</p>	

<p>84:13 FOCUSED [2] - 43:5, 66:10 FOCUSES [1] - 52:6 FOLLOW [8] - 5:16, 17:2, 57:11, 58:15, 62:7, 62:8, 93:17, 94:12 FOLLOWED [2] - 11:4, 62:12 FOLLOWING [3] - 12:20, 39:19, 62:9 FOLLOWS [2] - 32:20, 55:22 FOOD [2] - 52:9, 80:15 FOOTING [1] - 54:24 FOR [1] - 1:2 FOREGOING [1] - 98:6 FOREVER [1] - 92:18 FORGOT [1] - 55:16 FORKS [1] - 53:7 FORMERLY [1] - 48:18 FORWARD [4] - 6:25, 57:21, 58:9, 71:14 FOUR [1] - 9:8 FRAME [1] - 64:20 FRAMEWORK [1] - 4:22 FRANCHISE [3] - 24:24, 49:24, 50:10 FRANKLY [1] - 89:13 FRATERNITY [1] - 1:4 FREE [4] - 44:9, 55:3, 63:23, 64:5 FREES [1] - 68:24 FRONT [1] - 57:6 FUEL [1] - 50:17 FULL [1] - 36:3 FULTON [1] - 70:9 FUNCTION [1] - 51:7 FUNDAMENTAL [2] - 33:4, 92:14 FUTURE [1] - 84:25</p>	<p>GEOGRAPHY [2] - 9:23, 70:3 GEORGE [1] - 2:8 GEORGIA [75] - 4:11, 5:23, 7:12, 12:22, 13:2, 15:23, 16:19, 18:7, 18:17, 20:2, 20:17, 22:25, 23:6, 23:21, 25:8, 26:13, 26:20, 27:19, 27:25, 30:18, 32:3, 32:12, 34:6, 35:9, 35:19, 35:21, 41:9, 42:25, 45:9, 45:11, 46:19, 47:2, 47:21, 48:5, 48:12, 48:13, 48:17, 49:2, 49:8, 49:21, 53:3, 54:11, 57:2, 64:2, 64:11, 67:18, 72:22, 75:20, 75:21, 76:25, 77:5, 77:16, 77:20, 78:12, 78:21, 79:1, 84:1, 85:3, 85:17, 86:2, 86:5, 86:7, 86:11, 86:24, 88:15, 90:8, 92:3, 92:15, 92:24, 93:1, 93:5, 94:2, 95:3, 96:10 GEORGIA [4] - 1:2, 2:1, 3:2, 98:4 GEORGIA'S [10] - 8:17, 10:25, 34:1, 35:24, 36:19, 38:19, 46:9, 48:1, 56:8, 72:18 GEORGIANS [19] - 24:13, 26:2, 26:5, 26:6, 26:9, 27:12, 28:2, 28:3, 28:10, 29:17, 30:21, 30:22, 31:21, 34:16, 35:6, 35:7, 49:25, 50:1 GERMANY [3] - 73:21, 77:6, 77:8 GERMANY'S [1] - 72:22 GERRYMANDERING [3] - 38:9, 38:11, 70:25 GINA [1] - 52:16 GINGLES [59] - 4:22, 4:24, 5:6, 5:9, 5:13, 5:21, 6:8, 6:12, 13:10, 14:22, 14:23, 15:7, 15:17, 16:4, 16:24, 19:9, 31:5, 32:10, 39:16, 40:5, 40:15, 42:8, 42:10, 42:21, 42:22, 44:24, 45:5, 45:7, 45:8, 45:10, 45:13, 45:19, 46:25, 47:8, 56:16, 60:4, 60:7, 60:15, 60:16, 60:20, 60:24, 60:25, 67:4, 67:6, 69:10, 70:13, 71:15, 71:17, 74:16, 76:24, 78:18, 84:12, 85:1, 85:3, 85:18, 89:4, 89:5, 90:16, 90:17 GIST [1] - 2:10 GIVEN [6] - 16:7, 16:21, 34:7, 38:5, 54:1, 95:13 GLAD [2] - 4:13, 56:3 GLENN [1] - 4:10 GOAL [12] - 39:18, 39:20, 39:21, 57:12, 57:22, 57:23, 58:3, 58:6, 63:25, 66:11, 69:22, 81:22 GOALS [4] - 53:10, 66:10, 81:16, 82:9 GORDON [1] - 63:10 GORSUCH'S [1] - 81:3 GOVERNING [1] - 54:3 GOVERNMENT [6] - 28:6, 28:21, 30:23, 58:11, 59:11, 85:14 GOVERNMENTS [2] - 38:2, 57:9 GOVERNOR [1] - 80:1 GRANDFATHER [1] - 23:9 GRANDY [6] - 37:3, 37:23, 38:4, 71:1, 82:18, 84:9 GRANT [1] - 1:14 GRANT [11] - 32:23, 42:10, 42:11,</p>	<p>42:21, 44:25, 45:17, 55:1, 69:6, 69:12, 86:21, 94:20 GRANT/PENDERGRASS [2] - 32:18, 96:12 GRAPPLE [1] - 93:3 GRATEFUL [1] - 87:3 GRAVITATE [1] - 76:3 GREAT [3] - 3:18, 23:11, 63:7 GREATER [1] - 61:18 GREENE'S [1] - 41:20 GRIFFIN [1] - 10:9 GROCERY [2] - 11:10, 52:10 GROUND [4] - 71:3, 85:2, 86:7, 93:14 GROUNDED [1] - 13:15 GROUP [2] - 36:6, 61:9 GROUP'S [1] - 36:7 GROUPS [1] - 28:11 GROVE [1] - 11:25 GROWING [1] - 35:22 GROWN [1] - 35:8 GROWS [1] - 29:17 GROWTH [4] - 7:8, 7:13, 41:12, 51:7 GUARD [1] - 31:6 GUBERNATORIAL [1] - 49:6 GUESS [3] - 3:16, 43:7, 88:13 GWINNETT [2] - 36:4, 37:18</p>
G		H
<p>GAIN [1] - 69:2 GAINING [2] - 35:14, 35:15 GAINS [3] - 24:20, 34:21, 38:20 GALLING [1] - 54:7 GALVANIZE [1] - 26:22 GAME [1] - 39:12 GAP [6] - 25:18, 25:21, 25:25, 26:8, 30:5, 30:8 GAPS [2] - 77:21, 78:5 GARABADU [1] - 2:5 GARY [1] - 76:9 GATHER [1] - 64:10 GATHERS [1] - 64:16 GAUNTLET [2] - 89:2, 89:22 GENERAL [4] - 15:20, 19:19, 22:10, 76:5 GENERAL [2] - 27:20, 65:20 GENERALIZED [1] - 70:23 GENERALLY [1] - 78:11 GENERIC [1] - 87:23 GENETIC [1] - 48:10 GEOGRAPHIC [1] - 10:13 GEOGRAPHICALLY [5] - 10:18, 40:11, 45:2, 69:16, 70:10</p>	<p>GINGLES [59] - 4:22, 4:24, 5:6, 5:9, 5:13, 5:21, 6:8, 6:12, 13:10, 14:22, 14:23, 15:7, 15:17, 16:4, 16:24, 19:9, 31:5, 32:10, 39:16, 40:5, 40:15, 42:8, 42:10, 42:21, 42:22, 44:24, 45:5, 45:7, 45:8, 45:10, 45:13, 45:19, 46:25, 47:8, 56:16, 60:4, 60:7, 60:15, 60:16, 60:20, 60:24, 60:25, 67:4, 67:6, 69:10, 70:13, 71:15, 71:17, 74:16, 76:24, 78:18, 84:12, 85:1, 85:3, 85:18, 89:4, 89:5, 90:16, 90:17 GIST [1] - 2:10 GIVEN [6] - 16:7, 16:21, 34:7, 38:5, 54:1, 95:13 GLAD [2] - 4:13, 56:3 GLENN [1] - 4:10 GOAL [12] - 39:18, 39:20, 39:21, 57:12, 57:22, 57:23, 58:3, 58:6, 63:25, 66:11, 69:22, 81:22 GOALS [4] - 53:10, 66:10, 81:16, 82:9 GORDON [1] - 63:10 GORSUCH'S [1] - 81:3 GOVERNING [1] - 54:3 GOVERNMENT [6] - 28:6, 28:21, 30:23, 58:11, 59:11, 85:14 GOVERNMENTS [2] - 38:2, 57:9 GOVERNOR [1] - 80:1 GRANDFATHER [1] - 23:9 GRANDY [6] - 37:3, 37:23, 38:4, 71:1, 82:18, 84:9 GRANT [1] - 1:14 GRANT [11] - 32:23, 42:10, 42:11,</p>	<p>HABIT [1] - 49:8 HALF [5] - 36:18, 38:9, 38:12, 41:13, 44:5 HALLS [1] - 30:15 HAND [3] - 19:3, 28:21, 28:22 HANDLEY [7] - 15:13, 15:17, 16:12, 18:16, 20:18, 22:3, 75:3 HANDLEY'S [1] - 75:25 HANDS [2] - 34:16, 85:9 HAPPY [2] - 88:8, 94:22 HAPPY [1] - 96:23 HARBOR [2] - 38:1, 82:18 HARD [7] - 8:11, 30:7, 50:4, 53:14, 53:17, 90:23, 95:15 HARD-AND-FAST [1] - 50:4 HARVARD [1] - 84:21 HAUL [1] - 71:2 HAY [1] - 41:15 HEADLONG [1] - 85:18 HEALTH [2] - 25:9, 30:9 HEALTHCARE [2] - 50:8, 52:9 HEAR [4] - 31:7, 34:15, 37:15, 54:18 HEARD [13] - 6:8, 11:17, 51:11, 51:24, 52:16, 60:23, 65:23, 79:24, 80:9, 81:15, 88:17, 91:18, 91:20 HEARING [1] - 73:7 HEAT [2] - 9:8, 43:21 HEAVILY [6] - 52:18, 63:20, 67:24, 67:25, 68:4, 68:18 HELD [1] - 3:1 HELP [2] - 57:1, 64:5</p>

<p>HELPFUL [1] - 65:1 HELPING [2] - 58:15, 64:25 HELPS [1] - 64:20 HENRY [2] - 9:1, 10:12 HEREBY [1] - 98:6 HERSCHEL [1] - 78:22 HIGH [2] - 65:6, 92:16 HIGHER [4] - 13:4, 25:15, 26:5, 39:7 HIGHLIGHTED [1] - 26:25 HIGHLY [4] - 13:15, 38:4, 45:12, 93:15 HILL [3] - 61:2, 66:13, 67:8 HIMSELF [2] - 23:21, 40:19 HINDER [1] - 49:24 HISPANIC [1] - 83:18 HISTORIAN [2] - 46:8, 46:14 HISTORIANS [1] - 73:19 HISTORIC [1] - 12:3 HISTORICAL [2] - 72:25, 73:17 HISTORICALLY [2] - 24:10, 48:20 HISTORY [21] - 11:7, 20:11, 21:4, 21:19, 22:2, 22:12, 23:22, 23:24, 24:2, 25:12, 38:15, 46:1, 46:4, 46:8, 46:9, 46:12, 46:13, 48:1, 72:7, 72:16, 74:3 HOBBLING [1] - 38:2 HOC [2] - 19:22 HOLD [2] - 45:17, 85:9 HOLDING [1] - 39:24 HOME [3] - 41:12, 76:3, 93:8 HOMOGENEITY [1] - 44:23 HONEST [1] - 53:25 HONESTLY [1] - 42:7 HONOR [61] - 3:6, 3:8, 3:18, 3:20, 4:1, 4:3, 4:15, 14:4, 14:7, 19:24, 23:2, 32:22, 33:8, 34:4, 36:25, 38:23, 39:9, 39:11, 39:24, 40:3, 40:15, 40:21, 42:7, 45:18, 46:5, 50:14, 52:20, 53:12, 53:19, 53:25, 54:8, 54:21, 55:5, 55:16, 55:25, 56:1, 56:7, 64:18, 65:20, 66:2, 67:1, 68:20, 70:7, 71:12, 72:19, 82:5, 83:24, 85:16, 86:20, 87:4, 87:9, 87:22, 88:3, 88:12, 88:17, 90:20, 91:3, 91:17, 92:15, 94:3, 94:25 HONORABLE [1] - 1:20 HOPE [1] - 39:24 HOSPITALS [1] - 11:11 HOURLY [1] - 3:14 HOURS [2] - 9:8, 53:17 HOUSE [10] - 36:23, 44:3, 44:4, 51:25, 64:2, 64:6, 64:13, 66:18, 68:10, 69:1 HOUSING [1] - 52:8 HOUSTON [1] - 51:25 HUNDREDS [1] - 15:15</p>	<p>IDENTIFIES [1] - 76:24 IDENTIFY [3] - 44:21, 61:20, 69:15 IDENTITY [2] - 10:15, 11:7 IGNORE [1] - 38:14 IGNORED [1] - 52:15 ILLEGAL [2] - 29:3, 29:22 ILLUSTRATIVE [26] - 6:17, 7:1, 7:20, 7:24, 9:18, 9:25, 10:1, 13:19, 14:15, 37:10, 40:20, 40:25, 41:1, 41:4, 41:16, 42:24, 43:1, 43:14, 43:21, 43:25, 44:3, 44:6, 44:16, 51:15, 59:9, 65:15 IMAGE [1] - 87:17 IMAGES [1] - 50:14 IMAGINE [1] - 54:10 IMMUNE [1] - 71:1 IMPACT [4] - 24:6, 28:17, 48:20, 73:25 IMPLEMENT [1] - 60:12 IMPLICATIONS [1] - 53:22 IMPORTANT [12] - 5:3, 21:1, 48:13, 52:2, 56:21, 57:8, 58:6, 58:14, 70:20, 74:14, 95:7, 96:7 IMPORTANTLY [3] - 27:13, 35:2, 75:14 IMPOSE [1] - 38:21 IMPOVERISHED [1] - 19:25 IN [1] - 3:1 INACCESSIBLE [1] - 52:8 INADEQUATE [1] - 52:9 INAPPROPRIATE [1] - 67:4 INC [1] - 1:5 INCARNATIONS [1] - 25:2 INCLUDED [2] - 9:24, 84:3 INCLUDES [4] - 20:25, 24:2, 53:14, 68:3 INCLUDING [2] - 12:15, 16:22 INCOME [2] - 25:9, 50:7 INCONSISTENCIES [1] - 14:20 INCONSISTENT [1] - 9:12 INCREASE [1] - 28:12 INCREASES [1] - 77:5 INCREASING [1] - 82:8 INCREDIBLY [2] - 11:18, 75:8 INCUMBENT [4] - 8:3, 12:5, 83:20, 93:13 INCUMBENTS [2] - 8:14, 12:19 INDECIPHERABLE [1] - 43:21 INDEED [5] - 35:16, 37:23, 44:13, 44:16, 45:7 INDEFINITELY [1] - 84:25 INDEPENDENTLY [1] - 47:11 INDICATE [1] - 85:3 INDICATED [2] - 69:21, 74:22 INDICATES [2] - 74:25, 76:21 INDICATING [1] - 44:15 INDICATION [4] - 18:23, 20:10, 30:1, 76:18 INDIVIDUAL [1] - 4:11 INDIVIDUALS [2] - 54:22, 77:7 INEFFECTIVE [1] - 49:10 INFERENCE [3] - 18:20, 18:25, 47:7 INFLAME [1] - 50:16</p>	<p>INFLAMMATORY [1] - 50:13 INFORM [1] - 92:13 INFORMATION [3] - 95:13, 95:19, 96:20 INFORMED [1] - 47:25 INFUSE [1] - 92:14 INFUSES [1] - 90:19 INGENIOUS [1] - 55:8 INGENUITY [1] - 38:1 INITIAL [1] - 34:21 INJUNCTION [6] - 33:11, 54:2, 59:6, 73:6, 73:10, 89:19 INNOCENCE [1] - 37:19 INNOCUOUS [1] - 44:17 INPUT [2] - 81:13, 81:14 INQUIRY [5] - 17:10, 42:22, 47:13, 56:15, 60:14 INSEPARABLE [1] - 84:6 INSISTENCES [1] - 63:11 INSTEAD [5] - 18:13, 26:4, 33:18, 35:3, 42:19 INSTRUCTIONS [1] - 59:10 INTEGRATED [1] - 8:17 INTEND [1] - 87:10 INTENDED [2] - 50:16, 51:1 INTENSE [1] - 91:19 INTENSELY [5] - 23:5, 27:22, 60:1, 71:19, 72:13 INTENSIVE [5] - 56:17, 86:8, 89:21, 93:16, 93:23 INTENT [3] - 4:24, 19:6, 92:7 INTENTIONAL [4] - 70:15, 70:18, 73:6, 94:17 INTENTIONALLY [1] - 25:4 INTEREST [10] - 7:2, 8:16, 10:24, 15:12, 15:21, 27:17, 42:17, 67:18, 81:11, 81:25 INTERESTINGLY [1] - 78:18 INTERESTS [17] - 11:9, 20:25, 21:3, 22:17, 22:18, 48:6, 48:8, 52:4, 52:22, 54:14, 61:11, 75:16, 85:13, 91:8, 91:15, 91:16 INTERPRETED [1] - 85:1 INTERRUPT [1] - 14:6 INTERVENTION [1] - 56:16 INTRAPARTY [1] - 22:5 INVOKE [2] - 27:1, 40:16 INVOKED [1] - 33:25 INVOLVED [1] - 63:17 IRRELEVANT [1] - 38:10 ISSUE [5] - 27:14, 66:18, 67:8, 77:11, 79:11 ISSUES [22] - 21:1, 21:2, 21:18, 22:19, 28:1, 47:24, 48:12, 48:14, 51:22, 52:2, 56:20, 56:24, 60:21, 77:9, 77:10, 80:15, 80:16, 81:1, 81:4, 90:10, 91:25, 92:14 IT-IS-WHAT-IT-IS [1] - 92:5 ITSELF [1] - 41:8</p>
I		
<p>ID [1] - 48:21 IDEA [3] - 26:23, 71:7, 89:5 IDEOLOGICAL [1] - 28:20 IDENTIFICATION [1] - 24:25 IDENTIFIED [2] - 75:16, 75:23</p>		

J	L	
<p>JACKSON [3] - 13:5, 22:16, 31:13 JACKSON'S [1] - 31:11 JACOUTOT [1] - 2:15 JANUARY [1] - 95:2 JEFFERSON [1] - 51:13 JOB [5] - 83:20, 95:12, 95:15, 96:11, 96:21 JOHNSON [2] - 37:3, 37:23 JOINED [1] - 34:16 JOINING [1] - 44:20 JONES [1] - 1:20 JONES [12] - 18:16, 20:18, 21:9, 21:15, 21:20, 21:23, 23:23, 24:8, 24:17, 26:20, 27:11, 49:7 JONES' [1] - 27:16 JOSEPH [1] - 2:9 JOURNEY [1] - 56:2 JOYCE [1] - 2:10 JR [1] - 2:16 JUAN [1] - 2:8 JUDGE [3] - 71:21, 96:14, 96:15 JUDGE [1] - 1:21 JUDGE [4] - 18:20, 18:22, 73:5, 73:12 JUDGMENT [4] - 14:11, 46:23, 60:11, 60:17 JUDICIAL [1] - 56:16 JUMP [1] - 60:23 JURISDICTION [4] - 38:5, 56:6, 70:24, 92:13 JURISDICTIONS [1] - 91:10 JUSTICE [6] - 31:11, 31:13, 81:3, 88:20, 89:12, 89:17 JUSTICE [2] - 25:10, 84:23 JUSTIFICATION [2] - 52:25, 81:6 JUSTIFICATIONS [1] - 61:25</p>	<p>LA [1] - 2:15 LACK [6] - 21:11, 40:22, 52:6, 80:2, 80:22, 81:3 LACK-OF-RESPONSIVENESS [1] - 80:22 LAKIN [1] - 2:3 LAMENTED [1] - 21:25 LARGE [4] - 24:14, 45:2, 80:17, 80:22 LARGELY [3] - 27:19, 77:10, 77:21 LARGEST [1] - 68:1 LAST [10] - 4:19, 6:7, 6:9, 27:20, 34:24, 38:23, 41:13, 54:9, 56:13, 58:5 LASTLY [1] - 52:24 LATCH [1] - 41:18 LAUNCHES [1] - 43:4 LAW [12] - 3:23, 15:7, 32:9, 57:11, 58:15, 77:12, 94:3, 94:4, 94:9, 94:12, 94:14, 95:20 LAWFUL [1] - 53:10 LAWS [1] - 48:21 LAWSUITS [2] - 32:25, 34:23 LAWYER [1] - 54:8 LAWYERS [1] - 53:15 LEAGUE [2] - 19:7, 70:14 LEARNED [1] - 95:4 LEAST [7] - 19:8, 40:6, 44:11, 46:22, 76:25, 79:5, 79:13 LEAVE [2] - 88:8, 93:25 LED [3] - 43:25, 75:4, 76:25 LEFT [4] - 5:1, 40:1, 54:1, 87:6 LEGACY [1] - 30:9 LEGAL [7] - 25:5, 29:22, 45:6, 53:21, 54:3, 56:5, 93:21 LEGALLY [1] - 76:16 LEGISLATIVE [11] - 15:20, 23:15, 29:11, 29:13, 31:3, 32:12, 50:19, 52:23, 55:11, 79:12, 80:13 LEGISLATORS [2] - 52:18, 52:21 LEGISLATURE [11] - 30:16, 37:8, 58:12, 58:18, 59:4, 60:12, 65:21, 67:20, 69:5, 80:14, 83:1 LENGTHENING [2] - 65:17, 68:23 LESS [7] - 24:24, 28:4, 52:22, 78:4, 83:8, 95:11, 95:12 LEVEL [6] - 16:21, 26:4, 34:17, 50:24, 53:18, 90:7 LEVELS [8] - 13:4, 13:7, 26:6, 26:7, 26:10, 77:25, 78:1, 84:5 LEWIS [1] - 2:10 LIABILITY [3] - 17:2, 81:9, 86:2 LICENSE [1] - 10:9 LIE [2] - 42:22, 53:12 LIEU [1] - 37:10 LIEUTENANT [1] - 80:1 LIFE [8] - 77:20, 78:12, 92:2, 92:11, 92:19, 92:20, 92:24, 92:25 LIFELONG [2] - 51:24, 55:1 LIGHT [2] - 34:5, 86:20</p>	<p>LIKELY [5] - 5:18, 33:10, 49:15, 50:25, 52:22 LIKEWISE [2] - 60:16, 61:9 LIMIT [1] - 56:16 LIMITED [4] - 8:20, 14:14, 47:16, 71:23 LIMITING [1] - 82:12 LIN [1] - 2:3 LINE [6] - 11:15, 38:12, 38:17, 63:7, 64:25, 66:6 LINES [21] - 5:19, 11:4, 12:6, 12:20, 13:23, 16:7, 17:6, 17:14, 20:3, 20:4, 25:20, 28:20, 31:17, 51:2, 52:19, 52:25, 64:16 LIQUIDATING [2] - 31:14 LISA [1] - 15:13 LIST [3] - 49:1, 72:6, 77:11 LISTED [1] - 24:4 LISTEN [4] - 20:11, 20:12, 20:13, 21:4 LITERACY [1] - 53:7 LITIGATE [1] - 73:12 LITIGATING [1] - 33:18 LITIGATION [1] - 27:15 LIVE [1] - 23:9 LIVED [1] - 54:11 LIVES [2] - 10:20, 96:8 LIVING [1] - 24:12 LO [1] - 43:24 LOCAL [8] - 9:23, 23:5, 27:22, 38:2, 39:13, 60:1, 71:20, 72:13 LOCALIZED [1] - 93:15 LOCATION [2] - 42:5, 80:24 LOCATIONS [2] - 8:14, 42:13 LOCK [1] - 5:20 LOCKSTEP [1] - 90:12 LOCUST [1] - 11:25 LOFTON [4] - 10:7, 10:20, 11:23, 28:15 LOGIC [1] - 52:20 LOIS [1] - 1:14 LONGTIME [2] - 51:13, 76:8 LOOK [23] - 10:11, 11:20, 12:8, 17:10, 18:25, 26:4, 34:9, 36:11, 36:14, 38:16, 39:10, 43:11, 45:18, 60:9, 62:4, 62:19, 62:20, 63:8, 65:3, 82:21, 82:23, 84:12, 95:25 LOOKED [13] - 11:15, 15:19, 15:20, 25:17, 43:20, 57:7, 61:20, 62:1, 62:4, 63:6, 69:17, 77:11, 77:12 LOOKING [17] - 5:18, 6:9, 6:16, 7:23, 25:7, 31:2, 55:2, 58:2, 60:2, 65:5, 72:13, 78:16, 94:4, 94:15, 94:16, 94:18 LOSES [1] - 76:2 LOSING [2] - 35:11, 86:14 LOSS [1] - 42:7 LOSSES [1] - 19:11 LOST [1] - 35:12 LOWER [5] - 26:3, 26:10, 39:4, 63:23, 65:13 LULAC [2] - 58:2, 61:16</p>
K		
<p>KATIE [1] - 4:10 KAVANAUGH [1] - 84:23 KAVANAUGH'S [1] - 89:12 KEEP [7] - 8:15, 11:1, 29:23, 47:13, 58:18, 58:25, 79:8 KEEPING [3] - 12:12, 12:17, 58:6 KELSEY [1] - 2:7 KEPT [1] - 11:15 KEY [4] - 33:16, 59:15, 71:19, 75:18 KHANNA [12] - 32:21, 32:22, 55:13, 56:3, 59:23, 65:10, 69:11, 69:25, 70:14, 81:24, 83:4, 95:1 KHANNA [10] - 2:11, 3:7, 3:12, 3:16, 3:18, 32:22, 55:16, 55:19, 88:12, 94:25 KIND [10] - 19:7, 35:3, 58:25, 62:17, 63:22, 70:19, 73:14, 79:8, 89:24, 92:4 KINDS [2] - 25:3, 90:14 KNOWLEDGE [1] - 8:17 KNOWS [4] - 13:10, 63:1, 63:2, 63:3</p>		

LUMBER ^[1] - 9:1	MEANS ^[3] - 35:11, 78:10, 84:16 MEANT ^[2] - 92:11, 94:6 MEANWHILE ^[1] - 51:21 MEASURE ^[1] - 36:12 MEET ^[2] - 17:3, 41:6 MEMBER ^[2] - 38:10, 83:1 MEMBERS ^[3] - 27:20, 38:7, 83:12 MEMORY ^[1] - 24:12 MEN ^[1] - 78:23 MENACING ^[1] - 50:15 MENTALLY ^[1] - 53:13 MENTION ^[1] - 44:4 MENTIONED ^[4] - 3:8, 7:22, 7:24, 24:14 MERELY ^[1] - 61:11 MERIT ^[1] - 73:11 MERITS ^[1] - 33:10 MESSAGE ^[1] - 21:2 MET ^[6] - 5:6, 5:17, 14:22, 16:24, 71:17, 73:19 METHOD ^[1] - 49:8 METHODOLOGY ^[1] - 15:15 METHODS ^[6] - 24:8, 25:21, 48:19, 49:9, 49:19, 49:22 METICULOUS ^[1] - 93:23 METRIC ^[1] - 50:1 METRICS ^[7] - 6:19, 7:23, 8:6, 13:16, 37:4, 43:11, 63:5 METRO ^[2] - 8:2, 12:18 METRO ^[17] - 7:7, 7:12, 10:2, 10:15, 15:22, 16:18, 16:19, 27:18, 27:19, 30:17, 30:18, 37:16, 40:10, 41:17, 45:1, 65:4, 68:19 MIAMI ^[1] - 95:3 MICHIGAN ^[1] - 95:3 MIDR ^[1] - 77:13 MIDTERM ^[1] - 78:4 MIGHT ^[5] - 33:22, 38:25, 73:7, 90:21, 94:3 MILLEDGEVILLE ^[1] - 12:7 MILLER ^[2] - 2:4, 2:7 MILLER ^[5] - 51:24, 52:6, 54:16, 54:25, 80:11 MILLER'S ^[1] - 52:5 MILLIGAN ^[8] - 4:25, 6:15, 8:8, 9:22, 13:14, 31:12, 33:13, 57:6 MILLION ^[2] - 29:18, 49:2 MIND ^[2] - 27:2, 58:6 MINDED ^[2] - 8:14, 10:4 MING ^[1] - 2:7 MINI ^[1] - 73:2 MINIMIZE ^[1] - 35:22 MINORITIES ^[2] - 36:18, 83:5 MINORITY ^[41] - 19:12, 35:10, 35:13, 36:5, 36:11, 36:14, 36:15, 36:21, 36:22, 36:23, 37:13, 37:17, 37:20, 37:21, 38:2, 38:6, 38:7, 38:20, 38:21, 48:20, 51:11, 53:6, 53:8, 53:9, 55:8, 56:18, 57:3, 71:1, 74:17, 75:23, 77:20, 78:11, 79:21, 86:10, 90:1, 92:2, 92:19,	92:20, 92:24, 92:25, 93:18 MINORITY-PREFERRED ^[1] - 19:12 MINUTE ^[2] - 32:17, 55:14 MINUTES ^[5] - 4:6, 55:17, 87:6, 87:10, 96:4 MISTAKE ^[2] - 32:6, 37:19 MOBILE ^[1] - 94:16 MOBILIZE ^[1] - 21:14 MOMENT ^[1] - 32:11 MONDAY ^[2] - 3:17, 24:14 MORE-STRIPED ^[1] - 82:6 MORGAN ^[15] - 10:17, 39:6, 40:9, 40:19, 43:4, 43:8, 43:19, 44:4, 44:7, 63:16, 64:3, 66:11, 68:7, 68:11, 69:14 MORGAN'S ^[7] - 43:24, 44:19, 64:19, 65:3, 66:23, 67:2, 68:23 MORNING ^[1] - 32:22 MORPHING ^[1] - 55:8 MOST ^[9] - 24:11, 26:10, 27:13, 38:9, 43:17, 64:4, 69:17, 71:13, 77:24 MOSTLY ^[1] - 14:19 MOTION ^[1] - 73:5 MOTIVATE ^[1] - 77:23 MOUNT ^[2] - 18:10, 19:10 MOVE ^[11] - 17:25, 57:21, 58:9, 60:7, 65:9, 68:13, 69:10, 70:7, 71:7, 74:8, 84:9 MOVES ^[1] - 71:18 MOVING ^[11] - 10:23, 10:24, 11:12, 12:2, 12:8, 12:21, 14:23, 26:19, 27:11, 67:6, 71:14 MR ^[19] - 3:6, 3:20, 3:21, 4:1, 4:3, 4:5, 4:8, 4:15, 4:17, 12:11, 12:15, 14:4, 14:7, 32:6, 55:25, 87:9, 87:22, 88:3, 88:11 MS ^[9] - 3:7, 3:12, 3:16, 3:18, 32:22, 55:16, 55:19, 88:12, 94:25 MULTIPLE ^[2] - 25:21, 64:15 MUNICIPAL ^[5] - 8:2, 11:4, 11:15, 12:6, 62:9 MUNICIPALITIES ^[3] - 8:15, 12:12, 12:25 MUST ^[7] - 46:24, 54:11, 54:22, 58:18, 82:12, 84:13, 84:22 MUSTER ^[1] - 30:25 MYSTERY ^[1] - 93:22
<p style="text-align: center;">M</p>		
MA'AM ^[2] - 4:13, 4:16 MACON ^[8] - 7:12, 12:18, 15:22, 16:19, 27:18, 30:18, 64:15, 68:13 MACON-BIBB ^[1] - 12:18 MAGICAL ^[1] - 50:15 MAINTAIN ^[1] - 7:1 MAINTENANCE ^[1] - 77:11 MAJORITIES ^[1] - 45:3 MAJORITY ^[48] - 5:8, 5:13, 6:13, 7:16, 7:20, 8:4, 15:8, 16:22, 22:8, 26:22, 29:6, 29:18, 35:6, 35:7, 35:10, 36:5, 37:9, 39:2, 39:7, 40:12, 40:25, 44:5, 44:8, 44:9, 45:4, 45:16, 58:19, 59:5, 60:5, 61:21, 62:13, 62:20, 62:22, 63:3, 63:21, 64:1, 66:21, 66:25, 69:18, 69:21, 69:23, 70:10, 77:2, 79:25, 82:21, 83:14, 88:22, 89:3 MAJORITY-MINORITY ^[2] - 35:10, 36:5 MAKEBA ^[1] - 2:11 MAKEUP ^[1] - 61:24 MANAGEMENT ^[1] - 62:3 MAP ^[31] - 6:11, 6:19, 6:20, 9:11, 11:2, 12:19, 29:3, 39:20, 40:20, 41:5, 41:18, 41:22, 41:24, 42:9, 42:11, 42:23, 51:15, 52:17, 53:1, 54:18, 58:20, 61:5, 61:9, 61:17, 63:4, 64:19, 66:9, 66:15, 69:6, 87:23, 93:10 MAPPER ^[3] - 6:23, 13:15, 29:6 MAPPERS ^[1] - 6:11 MAPPING ^[3] - 6:24, 8:5, 43:18 MAPS ^[36] - 6:8, 6:9, 6:10, 8:18, 9:8, 9:9, 13:16, 14:13, 14:20, 32:25, 33:3, 43:5, 43:21, 43:22, 43:23, 43:25, 44:1, 44:4, 44:16, 53:1, 55:7, 55:11, 58:12, 60:9, 60:12, 60:13, 60:14, 61:13, 66:23, 67:2, 69:18, 74:3, 74:7, 87:25, 88:2 MARENGO ^[2] - 18:22, 76:17 MARISA ^[1] - 2:10 MARJORIE ^[1] - 41:20 MARKS ^[1] - 93:25 MASK ^[1] - 63:7 MASS ^[1] - 7:8 MATCH ^[2] - 49:12, 77:13 MATCHES ^[1] - 63:5 MATERIAL ^[2] - 73:10, 78:20 MATH ^[2] - 37:5, 39:13 MATTER ^[1] - 54:17 MATTER ^[2] - 3:7, 34:21 MATTERS ^[2] - 27:24, 74:19 MAY ^[1] - 2:6 MCBATH ^[2] - 83:16, 83:19 MCBATH'S ^[3] - 35:25, 37:9, 83:13 MCDONOUGH ^[3] - 4:11, 10:20, 10:22 MEAN ^[8] - 16:5, 36:20, 58:17, 63:1, 79:15, 85:14, 92:1, 94:8		<p style="text-align: center;">N</p> NAACP ^[1] - 81:2 NATIONWIDE ^[1] - 89:19 NATURAL ^[1] - 25:11 NATURE ^[2] - 10:14, 68:3 NEAR ^[2] - 39:5, 39:8 NEARBY ^[1] - 52:10 NEARLY ^[1] - 36:18 NECESSARILY ^[6] - 22:5, 67:10, 68:13, 70:1, 74:2, 80:10 NECESSARY ^[4] - 41:22, 62:15, 62:21, 66:24

<p>NECESSITY [1] - 70:4 NEED [11] - 11:12, 15:3, 15:8, 15:9, 19:6, 22:22, 36:10, 42:16, 53:6, 59:4, 95:14 NEEDED [1] - 86:4 NEEDLESSLY [1] - 29:14 NEEDS [8] - 30:21, 30:24, 52:8, 60:19, 80:9, 80:17, 93:15 NEGATIVE [2] - 14:25, 15:3 NEGRO [1] - 50:15 NEUTRAL [3] - 48:11, 61:6, 64:23 NEVER [3] - 9:9, 34:18, 35:1 NEVERTHELESS [1] - 17:17 NEW [17] - 25:2, 29:23, 44:5, 44:9, 47:5, 49:8, 52:19, 52:22, 53:20, 60:5, 61:20, 62:22, 63:21, 64:1, 64:6, 66:21, 66:25 NEXT [2] - 13:12, 69:10 NINE [2] - 87:6, 87:10 NIPPER [2] - 18:20, 19:13 NO [2] - 1:11, 1:16 NO.1:21-CV-05337-SCJ [1] - 1:6 NOMINATION [1] - 81:3 NON [6] - 39:2, 39:5, 79:25, 80:25, 83:14, 83:18 NON-HISPANIC [1] - 83:18 NON-MAJORITY [1] - 79:25 NON-WHITE [3] - 39:2, 39:5, 83:14 NONE [2] - 8:5, 42:25 NONETHELESS [1] - 88:23 NONRACIAL [1] - 19:12 NORMAL [1] - 65:5 NORMAL-LOOKING [1] - 65:5 NORTH [1] - 80:19 NORTH [4] - 41:17, 65:18, 66:22, 67:24 NORTHERN [2] - 1:2, 98:4 NORTHERN [1] - 80:20 NOTABLE [2] - 43:17, 46:6 NOTE [3] - 38:8, 42:15, 87:12 NOTED [7] - 21:5, 22:1, 46:23, 49:11, 49:14, 49:18, 88:24 NOTHING [2] - 36:5, 56:4 NOTING [1] - 34:22 NOTION [1] - 38:24 NUMBER [11] - 7:16, 11:2, 29:18, 38:16, 48:21, 48:22, 48:23, 48:24, 48:25, 63:2, 63:3 NUMBERS [13] - 35:12, 36:17, 37:1, 37:6, 38:21, 39:10, 39:12, 42:12, 63:7, 83:15, 83:17, 83:22, 93:19 NUMEROUS [3] - 7:6, 40:11, 90:4 NUTRITION [1] - 51:14</p>	<p>OBLIGATIONS [2] - 53:24, 71:2 OBSERVED [3] - 25:18, 47:17, 49:7 OBVIOUS [2] - 11:21, 42:15 OBVIOUSLY [3] - 23:22, 59:14, 73:11 OCCURRENCE [1] - 25:11 ODD [1] - 44:16 ODDS [1] - 13:11 OF [5] - 1:2, 1:20, 2:2, 2:13, 98:4 OFFERED [2] - 7:1, 15:17 OFFERS [1] - 47:18 OFFICE [2] - 27:12, 74:11 OFFICES [3] - 79:16, 80:10, 90:11 OFFICIAL [2] - 1:25, 98:15 OFFICIAL [1] - 23:22 OFFICIALS [15] - 25:2, 27:25, 28:5, 35:18, 51:11, 58:11, 58:15, 76:8, 79:19, 80:23, 82:24, 84:4, 91:7, 91:9, 93:7 OFFSET [1] - 38:11 OFTEN [4] - 30:21, 30:23, 49:17, 90:6 ON [2] - 2:2, 2:13 ONCE [5] - 5:17, 17:3, 17:4, 49:22, 57:16 ONE [40] - 3:7, 4:11, 6:19, 7:6, 8:21, 10:3, 10:4, 11:21, 12:10, 13:21, 15:10, 15:25, 18:1, 19:3, 22:21, 22:22, 29:3, 34:23, 37:13, 38:23, 40:18, 43:19, 46:12, 49:1, 50:3, 52:10, 56:10, 66:16, 68:1, 69:7, 70:8, 77:21, 87:24, 88:13, 89:9, 94:19, 95:22, 96:12 ONES [2] - 29:23, 79:7 OPEN [1] - 3:1 OPEN [21] - 17:18, 17:22, 23:4, 23:14, 29:12, 29:16, 29:20, 29:24, 30:4, 30:11, 30:14, 30:19, 31:1, 34:2, 56:9, 57:2, 57:17, 80:7, 83:10, 85:14, 88:6 OPENED [1] - 42:19 OPENING [8] - 33:24, 34:13, 37:7, 39:16, 46:2, 46:17, 84:3, 94:5 OPENNESS [9] - 6:2, 29:9, 29:10, 71:4, 72:1, 82:23, 84:8, 85:3, 85:17 OPERATE [2] - 16:8, 16:9 OPERATING [1] - 5:20 OPINE [1] - 69:14 OPINES [1] - 43:8 OPINION [5] - 18:20, 47:16, 70:18, 88:22, 89:18 OPINIONS [1] - 6:8 OPPORTUNITIES [6] - 19:5, 34:7, 37:13, 37:16, 37:18, 93:12 OPPORTUNITY [24] - 16:10, 16:16, 16:20, 17:7, 21:12, 24:3, 36:12, 36:14, 38:21, 42:4, 48:16, 51:6, 56:18, 57:14, 57:16, 57:23, 57:24, 58:14, 59:18, 74:18, 78:17, 84:13, 86:11, 87:3 OPPOSITE [1] - 22:15 OPPOSITION [2] - 45:12, 92:23 OPRAH [1] - 78:25 ORAL [1] - 31:12 ORDER [11] - 32:4, 32:15, 40:2, 46:23,</p>	<p>59:12, 60:12, 60:17, 63:20, 63:25, 89:22 ORDERS [1] - 60:22 ORDINARILY [1] - 31:16 ORGANIZATION [1] - 54:17 ORGANIZED [1] - 31:24 ORIGINALLY [1] - 83:16 ORIGINATED [1] - 78:25 OSSOFF [1] - 77:1 OTHERWISE [1] - 71:22 OUTCOME [1] - 57:23 OUTLETS [1] - 11:24 OUTRAGE [1] - 38:24 OUTRIGHT [1] - 54:7 OUTSET [2] - 33:24, 89:4 OUTSIDE [5] - 5:12, 45:16, 79:1, 90:7, 94:4 OUTSTANDING [2] - 95:12, 96:11 OUTVOTE [1] - 77:25 OVERALL [6] - 18:4, 26:8, 65:13, 79:18, 80:3, 83:22 OVEREMPHASIZE [1] - 9:11 OVERLAP [1] - 42:22 OVERLOOK [1] - 6:3 OVERREPRESENTED [1] - 49:4 OVERWHELMING [1] - 22:23 OVERWHELMINGLY [2] - 15:25, 49:4 OWE [2] - 96:10 OWN [6] - 14:13, 25:22, 40:18, 44:13, 48:6, 83:15</p>
O		P
<p>OBJECT [1] - 40:24 OBJECTED [1] - 50:12 OBJECTION [1] - 42:8 OBJECTIVE [3] - 6:19, 7:23, 13:16 OBLIGATION [4] - 57:9, 57:10, 58:11, 96:21</p>	<p>59:12, 60:12, 60:17, 63:20, 63:25, 89:22 ORDERS [1] - 60:22 ORDINARILY [1] - 31:16 ORGANIZATION [1] - 54:17 ORGANIZED [1] - 31:24 ORIGINALLY [1] - 83:16 ORIGINATED [1] - 78:25 OSSOFF [1] - 77:1 OTHERWISE [1] - 71:22 OUTCOME [1] - 57:23 OUTLETS [1] - 11:24 OUTRAGE [1] - 38:24 OUTRIGHT [1] - 54:7 OUTSET [2] - 33:24, 89:4 OUTSIDE [5] - 5:12, 45:16, 79:1, 90:7, 94:4 OUTSTANDING [2] - 95:12, 96:11 OUTVOTE [1] - 77:25 OVERALL [6] - 18:4, 26:8, 65:13, 79:18, 80:3, 83:22 OVEREMPHASIZE [1] - 9:11 OVERLAP [1] - 42:22 OVERLOOK [1] - 6:3 OVERREPRESENTED [1] - 49:4 OVERWHELMING [1] - 22:23 OVERWHELMINGLY [2] - 15:25, 49:4 OWE [2] - 96:10 OWN [6] - 14:13, 25:22, 40:18, 44:13, 48:6, 83:15</p>	<p>P.M [3] - 1:4, 3:1, 97:2 P.M [2] - 32:20, 55:22 PACKED [2] - 70:2, 70:4 PAGE [1] - 46:18 PAGES [5] - 39:22, 73:10, 87:15, 87:20, 98:6 PAINFUL [1] - 24:2 PAINTED [2] - 52:3, 93:12 PAINTING [1] - 93:5 PAIRINGS [2] - 8:3, 12:5 PALMER [3] - 47:9, 74:22, 75:3 PALMER'S [1] - 47:6 PAPERS [1] - 14:11 PARAGRAPHS [1] - 45:18 PARAMETERS [1] - 59:10 PARK [2] - 80:20, 80:23 PARRY [1] - 53:20 PART [19] - 10:15, 41:11, 45:13, 47:10, 54:21, 59:12, 59:25, 65:14, 66:23, 67:15, 67:24, 67:25, 70:17, 71:19, 71:24, 80:20, 80:21, 81:16, 95:14 PARTICIPANT [1] - 51:18 PARTICIPATE [5] - 25:14, 56:19, 71:10, 74:18, 86:11 PARTICIPATES [1] - 59:20 PARTICIPATION [9] - 25:16, 25:17, 25:24, 26:13, 26:16, 28:16, 30:6, 50:3,</p>

<p>80:7 PARTICULAR^[10] - 5:20, 22:14, 26:6, 26:18, 71:25, 74:5, 74:7, 77:23, 81:22, 82:7 PARTICULARIZED^[1] - 80:9 PARTICULARLY^[2] - 24:23, 93:1 PARTIES^[8] - 16:3, 21:1, 21:8, 21:14, 21:22, 22:14, 31:21, 45:7 PARTIES'^[2] - 20:22, 31:23 PARTISAN^[13] - 20:21, 21:7, 21:9, 47:20, 47:25, 60:21, 70:23, 70:25, 76:14, 81:1, 81:15, 82:1 PARTISANSHIP^[12] - 15:1, 20:20, 21:11, 46:19, 47:3, 48:9, 48:12, 59:1, 79:9, 82:2, 82:3, 86:17 PARTS^[2] - 41:16, 67:15 PARTY^[2] - 21:14, 21:24 PARTY^[21] - 15:1, 15:5, 18:8, 19:1, 19:21, 20:2, 20:3, 21:24, 22:5, 22:10, 24:21, 28:20, 57:18, 76:3, 76:21, 79:7, 82:24, 84:6, 85:7, 91:14 PARTY-CONSCIOUS^[1] - 76:21 PASS^[1] - 55:3 PASSED^[2] - 28:11, 87:15 PAST^[5] - 24:5, 46:4, 49:17, 53:14, 75:21 PASTOR^[1] - 51:13 PATH^[1] - 93:17 PATTERN^[6] - 15:11, 16:2, 48:3, 49:7, 64:7, 75:8 PATTERNS^[25] - 5:10, 5:19, 15:2, 15:24, 16:5, 17:6, 17:14, 20:1, 20:9, 20:10, 20:16, 22:24, 29:25, 31:9, 31:15, 31:16, 31:19, 38:15, 38:16, 68:10, 75:19, 75:20, 76:14, 90:14 PEACHTREE^[1] - 63:20 PELHAM^[1] - 13:1 PENDERGRASS^[8] - 32:23, 40:3, 42:20, 54:25, 69:10, 69:12, 86:22, 94:19 PENDERGRASS^[1] - 1:9 PENDING^[1] - 73:7 PENNY^[2] - 1:24, 98:15 PEOPLE^[15] - 26:22, 61:23, 69:21, 72:20, 78:3, 79:1, 85:11, 91:11, 91:12, 91:13, 92:22, 95:8, 95:22, 95:24, 96:10 PEOPLE'S^[1] - 96:8 PERCEIVED^[1] - 20:25 PERCENT^[19] - 8:12, 28:10, 36:1, 39:4, 39:5, 39:7, 39:8, 41:12, 49:11, 61:19, 65:8, 68:13, 68:21, 77:7, 81:23, 83:8, 83:14, 83:18 PERCENTAGE^[2] - 63:23, 65:13 PEREZ^[1] - 84:17 PERFECT^[1] - 11:14 PERFORMANCE^[1] - 36:7 PERHAPS^[3] - 42:15, 42:18, 43:17 PERMANENT^[1] - 89:19 PERMEATES^[1] - 72:18</p>	<p>PERSIST^[9] - 25:8, 26:17, 26:20, 27:7, 28:2, 29:23, 30:1, 30:12, 31:15 PERSISTED^[1] - 24:19 PERSISTENT^[4] - 5:10, 17:14, 20:10, 28:1 PERSISTS^[2] - 27:13, 30:18 PERSON^[1] - 26:23 PERSONAL^[3] - 4:20, 25:23, 26:1 PERSPECTIVE^[1] - 65:20 PERSUADE^[1] - 51:1 PHASE^[3] - 33:11, 46:25 PHI^[1] - 1:4 PHI^[6] - 4:5, 4:12, 5:7, 67:2, 69:13, 86:21 PHONE^[2] - 51:22, 78:25 PHYSICALLY^[1] - 53:13 PI^[1] - 9:4 PICKING^[1] - 14:19 PICTURE^[5] - 17:10, 19:24, 34:1, 52:3, 78:19 PIECE^[4] - 6:5, 18:4, 82:16 PIECES^[4] - 70:19, 77:13, 81:19, 84:4 PINK^[1] - 66:20 PITCH^[1] - 53:7 PLACE^[13] - 18:25, 24:15, 32:15, 48:25, 59:15, 59:17, 71:9, 80:18, 81:5, 84:10, 84:16, 86:8, 92:21 PLACED^[1] - 41:19 PLACES^[4] - 62:19, 86:3, 86:4, 91:4 PLAINTIFFS^[4] - 1:5, 1:10, 1:15, 2:2 PLAINTIFFS^[40] - 4:6, 4:11, 5:24, 6:25, 14:22, 14:25, 19:4, 20:14, 32:13, 32:14, 32:23, 32:25, 33:10, 37:15, 41:23, 42:2, 46:24, 47:22, 53:2, 55:5, 59:7, 59:13, 60:1, 60:9, 70:1, 71:17, 72:3, 73:14, 74:1, 74:20, 75:7, 77:9, 77:15, 78:24, 79:4, 81:19, 82:11, 89:22, 93:13, 95:23 PLAINTIFFS'^[17] - 37:10, 39:20, 44:18, 46:4, 47:7, 51:15, 58:17, 60:16, 72:5, 73:5, 73:9, 74:9, 77:22, 82:9, 82:25, 83:6, 92:9 PLAN^[35] - 8:7, 9:6, 41:1, 41:2, 41:4, 41:16, 43:13, 52:23, 59:6, 59:9, 60:6, 61:3, 62:3, 63:2, 63:5, 63:12, 64:2, 64:13, 65:4, 65:9, 65:11, 65:15, 65:21, 66:3, 66:17, 66:18, 66:20, 67:21, 67:23, 68:10, 80:13, 83:17, 87:17, 87:18 PLANS^[41] - 6:17, 6:18, 7:1, 7:20, 7:24, 7:25, 8:19, 9:1, 9:2, 9:18, 9:21, 9:25, 13:19, 14:15, 14:16, 43:14, 57:2, 59:3, 61:17, 62:1, 62:15, 62:18, 62:25, 63:17, 64:8, 66:7, 67:2, 67:6, 68:17, 68:21, 68:23, 69:6, 69:8, 81:9, 81:18, 81:20, 82:9, 86:15, 86:25 PLATE^[1] - 10:10 PLAY^[2] - 61:7, 85:7 PLAYING^[1] - 74:23 PLENTY^[1] - 55:20</p>	<p>PLUS^[1] - 68:21 POCKETS^[1] - 91:10 POINT^[34] - 19:18, 22:3, 26:12, 28:9, 28:25, 29:2, 31:13, 34:11, 36:9, 37:2, 38:23, 39:18, 42:14, 47:22, 50:14, 57:17, 58:4, 58:20, 59:15, 63:11, 66:14, 66:19, 69:8, 69:11, 70:8, 71:24, 72:11, 73:4, 76:15, 89:8, 90:21, 91:17, 92:8, 94:8 POINTED^[3] - 70:9, 74:25, 89:12 POINTING^[1] - 77:3 POINTS^[4] - 4:9, 34:9, 37:7, 88:14 POLARIZATION^[10] - 18:8, 18:19, 22:6, 46:19, 47:2, 47:17, 47:19, 48:3, 76:20, 85:21 POLARIZED^[34] - 5:10, 5:19, 15:2, 15:11, 15:24, 16:2, 16:8, 16:13, 16:21, 17:6, 17:15, 18:18, 18:23, 20:2, 20:9, 20:16, 22:4, 22:8, 22:20, 22:25, 29:25, 31:5, 31:9, 31:15, 31:19, 46:15, 50:24, 58:21, 58:22, 76:16, 76:18, 90:25, 91:6 POLICY^[2] - 52:23, 81:6 POLITICAL^[49] - 6:2, 7:15, 11:6, 11:7, 15:8, 17:18, 17:22, 20:12, 21:11, 21:19, 22:2, 22:12, 23:4, 23:14, 23:25, 24:1, 25:15, 25:16, 29:9, 29:10, 29:15, 29:19, 29:24, 30:2, 30:5, 30:7, 30:10, 30:13, 30:19, 30:25, 35:19, 38:11, 51:18, 53:9, 57:17, 58:8, 59:18, 61:10, 71:3, 74:18, 76:3, 81:11, 83:21, 84:13, 85:15, 85:24, 88:6, 90:19, 91:13 POLITICALLY^[4] - 51:19, 53:3, 53:4, 71:10 POLITICS^[24] - 18:13, 18:24, 20:11, 26:20, 30:1, 32:2, 32:3, 53:2, 56:17, 57:18, 57:24, 70:12, 71:6, 74:9, 76:19, 76:21, 76:22, 78:23, 85:7, 86:9, 92:11, 92:18, 92:19, 92:21 POLL^[1] - 23:9 POLLING^[1] - 48:25 POLLS^[1] - 51:7 POPULATION^[29] - 7:6, 7:7, 7:13, 7:25, 10:4, 29:17, 35:14, 36:2, 36:13, 36:16, 36:19, 39:5, 39:8, 40:10, 41:12, 42:5, 44:9, 44:25, 51:8, 61:19, 64:5, 66:22, 68:4, 68:5, 68:25, 81:21, 83:9, 90:4 POPULATIONS^[6] - 35:9, 43:2, 64:11, 64:17, 65:6, 90:6 PORTION^[2] - 17:9, 70:9 PORTIONS^[1] - 11:18 POSES^[1] - 37:11 POSITION^[2] - 20:5, 22:19 POSITIONS^[5] - 20:22, 21:2, 21:18, 21:21, 31:23 POSSIBLE^[4] - 43:20, 63:23, 74:15, 96:20 POSSIBLY^[1] - 42:8 POST^[2] - 19:22, 35:3 POST-RACIAL^[1] - 35:3</p>
---	--	---

<p>POVERTY [1] - 13:4</p> <p>POWER [16] - 5:12, 5:21, 17:5, 17:16, 17:24, 23:18, 23:25, 24:21, 25:21, 29:14, 30:15, 35:12, 35:15, 38:3, 92:22</p> <p>POWERFUL [3] - 8:6, 20:15, 27:2</p> <p>POWERPOINT [2] - 14:2, 59:21</p> <p>PRACTICE [1] - 74:5</p> <p>PRACTICES [14] - 24:3, 24:12, 24:18, 24:25, 25:5, 29:21, 48:15, 72:25, 73:17, 74:2, 76:23, 76:25, 77:15, 77:17</p> <p>PREACH [1] - 51:16</p> <p>PREACHING [1] - 54:14</p> <p>PRECEDENT [5] - 54:3, 60:8, 60:11, 78:7, 94:18</p> <p>PRECINCT [2] - 61:18, 63:14</p> <p>PRECINCTS [3] - 49:4, 62:14, 64:16</p> <p>PRECISE [2] - 27:15, 38:13</p> <p>PRECISELY [3] - 27:21, 31:4, 38:1</p> <p>PRECONDITIONS [8] - 5:17, 14:24, 17:3, 17:4, 60:24, 71:16, 71:18, 89:4</p> <p>PREDETERMINED [1] - 22:15</p> <p>PREDICTOR [1] - 21:6</p> <p>PREDOMINANCE [7] - 14:8, 40:17, 61:8, 65:1, 66:6, 67:3, 69:5</p> <p>PREDOMINANT [2] - 60:13, 66:13</p> <p>PREDOMINATE [3] - 6:22, 61:3, 63:12</p> <p>PREDOMINATED [1] - 13:18</p> <p>PREDOMINATES [1] - 67:9</p> <p>PREFER [3] - 60:18, 61:11, 74:11</p> <p>PREFERENCE [1] - 21:7</p> <p>PREFERENCES [3] - 36:6, 47:20, 70:23</p> <p>PREFERRED [30] - 5:12, 16:1, 16:5, 16:11, 19:12, 34:2, 34:5, 34:11, 35:18, 36:8, 36:21, 36:22, 36:23, 45:12, 45:15, 49:5, 49:21, 75:15, 76:1, 76:4, 76:11, 76:12, 79:20, 79:22, 80:5, 82:20, 82:23, 83:2, 83:7</p> <p>PREFERRING [1] - 72:8</p> <p>PREJUDICE [1] - 50:17</p> <p>PREJUDICIAL [1] - 50:13</p> <p>PRELIMINARY [5] - 33:11, 54:2, 59:6, 73:6, 73:10</p> <p>PREMISE [1] - 38:5</p> <p>PREPARED [1] - 55:5</p> <p>PREREQUISITE [1] - 50:20</p> <p>PRESENT [6] - 5:15, 13:14, 54:9, 86:9, 87:4, 95:16</p> <p>PRESENTATION [1] - 87:14</p> <p>PRESENTED [1] - 74:20</p> <p>PRESENTING [2] - 95:13, 95:16</p> <p>PRESIDENTIAL [1] - 78:4</p> <p>PRESUMABLY [1] - 50:23</p> <p>PRESUME [2] - 73:24, 82:3</p> <p>PREVAILED [2] - 27:5, 39:20</p> <p>PREVIOUS [2] - 34:25, 49:9</p> <p>PREVIOUSLY [1] - 70:3</p> <p>PRIMARIES [2] - 47:9, 76:6</p>	<p>PRIMARILY [4] - 56:13, 60:20, 70:2, 80:24</p> <p>PRIMARY [9] - 18:1, 22:4, 22:7, 22:9, 47:11, 52:17, 75:25, 76:2</p> <p>PRIME [1] - 9:6</p> <p>PRINCIPLE [4] - 39:19, 44:12, 44:22, 82:12</p> <p>PRINCIPLES [17] - 5:9, 6:14, 6:21, 7:22, 8:11, 13:24, 14:17, 39:22, 40:13, 40:24, 41:10, 43:6, 43:9, 61:4, 66:15, 67:9, 69:9</p> <p>PRINTING [1] - 14:4</p> <p>PRIORITIZATION [2] - 14:15, 69:14</p> <p>PRIORITIZED [1] - 43:19</p> <p>PRIORITIZES [1] - 40:21</p> <p>PRITTY [2] - 1:24, 98:15</p> <p>PROBLEM [1] - 31:19</p> <p>PROBLEMATIC [1] - 26:24</p> <p>PROCEDURES [2] - 24:3, 49:12</p> <p>PROCEEDINGS [5] - 32:19, 33:21, 55:21, 69:3, 98:7</p> <p>PROCEEDINGS [2] - 3:1, 97:2</p> <p>PROCESS [35] - 6:2, 9:11, 17:18, 17:22, 23:4, 23:14, 24:1, 25:15, 29:9, 29:10, 29:15, 29:19, 29:24, 30:3, 30:10, 30:13, 30:19, 30:25, 35:19, 51:18, 56:22, 62:7, 62:9, 62:11, 63:19, 71:5, 71:24, 74:18, 78:17, 81:13, 81:16, 86:10, 88:6, 90:19, 92:8</p> <p>PROCESSES [1] - 57:17</p> <p>PRODUCT [2] - 48:12, 51:12</p> <p>PROHIBIT [1] - 4:23</p> <p>PROHIBITIONS [1] - 85:19</p> <p>PROHIBITS [1] - 44:12</p> <p>PROJECTS [1] - 13:2</p> <p>PROMISED [2] - 39:17, 39:25</p> <p>PROMOTE [1] - 26:13</p> <p>PROOF [3] - 19:11, 48:22, 60:2</p> <p>PROPER [2] - 4:9, 45:6</p> <p>PROPERLY [1] - 85:1</p> <p>PROPORTIONAL [2] - 37:3, 57:13</p> <p>PROPORTIONALITY [16] - 36:9, 36:10, 36:17, 36:20, 37:2, 37:25, 38:12, 38:23, 39:3, 57:15, 82:13, 82:15, 82:17, 82:22, 83:10</p> <p>PROPOSED [6] - 3:9, 6:18, 60:10, 62:1, 64:23, 82:9</p> <p>PROPOSING [1] - 59:7</p> <p>PROPOSITION [1] - 70:16</p> <p>PROPTER [1] - 19:22</p> <p>PROSPECT [1] - 35:17</p> <p>PROTECT [1] - 48:7</p> <p>PROVE [5] - 14:25, 15:1, 15:3, 19:4, 22:22</p> <p>PROVED [3] - 6:5, 49:10, 71:25</p> <p>PROVEN [2] - 14:24, 32:13</p> <p>PROVIDE [6] - 14:5, 16:15, 16:20, 17:19, 36:10, 46:7</p> <p>PROVIDED [3] - 14:2, 47:5, 73:21</p>	<p>PROVIDING [1] - 3:9</p> <p>PROVISION [3] - 89:15, 89:16, 89:20</p> <p>PROXIMATE [1] - 11:23</p> <p>PROXIMITY [1] - 10:13</p> <p>PUBLIC [4] - 28:4, 52:7, 62:4, 80:15</p> <p>PULL [2] - 54:5, 71:2</p> <p>PULLING [2] - 37:4, 37:20</p> <p>PURGED [1] - 49:3</p> <p>PURGES [2] - 24:25, 48:23</p> <p>PURPORTED [4] - 37:22, 44:13, 44:14, 52:24</p> <p>PURPOSE [3] - 56:15, 58:3, 58:7</p> <p>PURPOSES [1] - 83:10</p> <p>PURSUING [1] - 66:16</p> <p>PURSUIT [1] - 39:20</p> <p>PUT [9] - 6:25, 19:7, 20:24, 29:2, 71:2, 75:7, 79:4, 81:18, 92:1</p> <p>PUTTING [2] - 59:22, 78:19</p> <p>PUZZLE [1] - 82:16</p> <p>PUZZLING [1] - 44:10</p>
Q		
<p>QUALIFIED [1] - 8:25</p> <p>QUALIFIER [1] - 50:21</p> <p>QUALITATIVE [1] - 89:21</p> <p>QUALITY [1] - 28:5</p> <p>QUANTITATIVE [1] - 89:21</p> <p>QUARTER [1] - 35:8</p> <p>QUESTIONS [12] - 5:3, 31:25, 33:21, 64:18, 70:12, 71:21, 73:13, 87:11, 88:8, 89:9, 94:22, 94:24</p> <p>QUICK [1] - 52:11</p> <p>QUITE [1] - 34:20</p> <p>QUOTATIONS [1] - 87:16</p> <p>QUOTE [1] - 67:7</p>		
R		
<p>RACE [102] - 6:21, 8:21, 9:11, 13:18, 13:22, 14:15, 15:5, 18:9, 18:13, 18:24, 19:1, 20:11, 20:16, 20:20, 21:6, 21:17, 22:23, 40:21, 43:5, 43:19, 43:20, 43:21, 43:25, 44:1, 44:2, 46:20, 47:3, 47:17, 47:18, 47:20, 47:24, 47:25, 48:6, 48:11, 48:14, 49:6, 56:18, 58:1, 58:4, 58:8, 59:16, 61:3, 61:5, 61:6, 61:7, 63:12, 64:19, 64:23, 64:25, 65:1, 65:3, 65:21, 65:25, 66:6, 66:7, 66:10, 66:12, 66:16, 67:3, 67:8, 68:14, 69:4, 69:5, 69:7, 69:14, 70:12, 71:6, 71:8, 72:23, 74:8, 74:23, 75:1, 75:5, 76:19, 76:21, 78:17, 78:21, 82:2, 82:3, 82:24, 84:6, 84:18, 84:19, 84:21, 84:24, 85:6, 85:19, 86:9, 86:16, 86:19, 86:25, 90:12, 90:19, 92:13, 92:14</p> <p>RACE-BASED [5] - 61:7, 84:21, 84:24, 85:6, 85:19</p> <p>RACE-BLIND [2] - 64:19, 65:3</p> <p>RACE-CONSCIOUS [5] - 18:24, 20:11, 65:21, 76:19, 76:21</p>		

<p>RACE-NEUTRAL [3] - 48:11, 61:6, 64:23</p> <p>RACES [5] - 22:7, 79:12, 79:13, 90:9, 91:8</p> <p>RACIAL [88] - 9:8, 14:8, 14:10, 14:13, 14:20, 15:9, 15:13, 15:18, 18:13, 18:21, 20:4, 20:5, 20:23, 21:3, 21:10, 21:15, 21:21, 21:23, 22:9, 23:18, 23:22, 25:8, 25:12, 26:20, 26:21, 27:4, 27:6, 27:8, 28:1, 29:15, 30:1, 30:12, 31:22, 31:25, 32:1, 34:17, 35:3, 36:6, 36:7, 36:18, 38:9, 38:15, 39:18, 39:19, 39:21, 40:16, 44:22, 50:11, 50:16, 50:17, 51:2, 51:9, 56:17, 58:22, 60:21, 61:8, 61:17, 61:22, 61:24, 63:15, 64:7, 64:11, 64:16, 66:10, 66:11, 68:3, 68:11, 72:17, 73:6, 73:24, 75:23, 78:14, 78:15, 78:19, 79:6, 79:7, 79:14, 82:7, 83:4, 83:22, 85:21, 86:8, 90:7, 90:14, 91:10, 91:22</p> <p>RACIALLY [1] - 18:23</p> <p>RACIALLY [30] - 5:10, 5:19, 15:2, 15:11, 16:2, 16:8, 16:13, 16:21, 17:5, 17:15, 18:18, 20:2, 20:9, 20:16, 22:4, 22:24, 29:25, 31:5, 31:9, 31:15, 46:15, 50:24, 58:21, 60:13, 76:16, 76:18, 81:21, 90:25, 91:6</p> <p>RADIATING [1] - 68:18</p> <p>RAFFENSPERGER [3] - 1:7, 1:12, 1:17</p> <p>RAHUL [1] - 2:5</p> <p>RAINBOWS [1] - 85:8</p> <p>RAISED [6] - 6:7, 28:24, 33:16, 77:9, 81:1, 88:14</p> <p>RAISES [1] - 5:3</p> <p>RAN [1] - 79:25</p> <p>RANDOM [1] - 25:10</p> <p>RANDOMLY [1] - 48:9</p> <p>RANGE [1] - 42:25</p> <p>RAPHAEL [1] - 23:7</p> <p>RATE [1] - 77:7</p> <p>RATHER [2] - 28:12, 47:3</p> <p>RAZOR [1] - 35:7</p> <p>REACH [2] - 58:20, 85:20</p> <p>READ [4] - 14:17, 72:4, 94:6, 94:14</p> <p>READING [1] - 96:5</p> <p>READY [4] - 9:6, 9:18, 32:21, 55:24</p> <p>REAFFIRMED [2] - 33:12, 45:6</p> <p>REALIGNED [2] - 20:21, 21:10</p> <p>REALIGNMENTS [1] - 21:8</p> <p>REALITY [6] - 7:7, 7:14, 7:15, 34:20, 35:4, 86:7</p> <p>REALIZED [1] - 96:6</p> <p>REALLY [7] - 23:1, 33:17, 52:4, 90:23, 91:18, 93:3, 94:5</p> <p>REAPPORTIONMENT [1] - 61:3</p> <p>REASON [8] - 5:16, 15:1, 36:16, 57:15, 57:16, 61:4, 66:5, 67:14</p> <p>REASONABLE [2] - 8:20, 9:19</p> <p>REASONABLY [5] - 5:8, 6:13, 8:7, 17:7, 90:3</p>	<p>REASONS [5] - 6:23, 9:16, 17:17, 71:20, 73:23</p> <p>REBUT [1] - 19:11</p> <p>REBUTTAL [2] - 4:6, 70:1</p> <p>RECEIVE [1] - 49:15</p> <p>RECEIVED [1] - 73:23</p> <p>RECENT [2] - 19:19, 27:3</p> <p>RECESS [2] - 32:19, 55:21</p> <p>RECOGNIZE [3] - 37:12, 54:19, 78:7</p> <p>RECOGNIZED [2] - 5:22, 74:15</p> <p>RECONCILING [1] - 92:4</p> <p>RECORD [24] - 5:5, 7:3, 12:24, 13:14, 14:21, 17:19, 17:20, 17:21, 18:2, 18:12, 19:15, 20:14, 22:12, 22:23, 23:19, 24:7, 32:9, 32:11, 36:6, 54:2, 76:15, 79:5, 87:12, 87:19</p> <p>RECORDED [1] - 1:23</p> <p>REDISTRICTING [19] - 28:17, 39:19, 39:22, 41:10, 43:6, 44:22, 52:23, 56:2, 57:2, 59:3, 61:17, 66:15, 74:2, 84:24, 86:15, 86:25, 91:24, 91:25, 94:10</p> <p>REDISTRICTING-RELATED [1] - 91:25</p> <p>REFER [1] - 35:24</p> <p>REFERENCE [2] - 83:11, 83:12</p> <p>REFERENCED [4] - 34:13, 65:10, 72:17, 86:6</p> <p>REFERENCES [1] - 72:24</p> <p>REFERRED [2] - 33:25, 44:7</p> <p>REFLECT [1] - 35:3</p> <p>REFLECTED [1] - 52:22</p> <p>REFLECTS [1] - 35:4</p> <p>REFRAIN [1] - 46:3</p> <p>REFUTES [1] - 52:5</p> <p>REGARDING [1] - 15:18</p> <p>REGARDLESS [8] - 4:24, 26:17, 42:20, 72:23, 74:10, 74:11, 83:1</p> <p>REGION [1] - 13:2</p> <p>REGIONAL [2] - 8:2, 62:5</p> <p>REGISTRATION [2] - 23:7, 77:7</p> <p>REIMPORT [1] - 91:18</p> <p>REIMPORTING [1] - 92:7</p> <p>REINJECTING [1] - 92:8</p> <p>REJECT [1] - 38:19</p> <p>REJECTED [3] - 37:25, 38:4, 91:20</p> <p>RELATE [1] - 21:2</p> <p>RELATED [7] - 46:1, 46:9, 47:25, 48:6, 63:9, 70:18, 91:25</p> <p>RELATIONSHIP [1] - 50:2</p> <p>RELATIVELY [1] - 65:4</p> <p>RELIED [2] - 10:12, 61:15</p> <p>RELIES [1] - 52:18</p> <p>RELY [2] - 34:10, 77:15</p> <p>RELYING [1] - 19:17</p> <p>REMAIN [2] - 50:8, 94:2</p> <p>REMAINED [2] - 7:17, 21:10</p> <p>REMAINS [3] - 35:20, 89:18, 92:16</p> <p>REMARKABLE [3] - 54:21, 75:12, 75:13</p> <p>REMEDIES [4] - 60:10, 67:4, 85:6, 85:19</p>	<p>REMEDY [5] - 9:20, 32:15, 70:5, 84:21, 85:25</p> <p>REMEMBER [7] - 9:4, 29:2, 56:21, 70:20, 74:14, 80:18, 95:4</p> <p>REMEMBERING [2] - 56:25, 81:7</p> <p>REMIND [1] - 58:2</p> <p>REMINDED [2] - 36:1, 56:12</p> <p>REMINDER [1] - 61:1</p> <p>REMOVAL [2] - 25:1, 25:2</p> <p>REMOVED [1] - 49:2</p> <p>REMOVING [1] - 63:20</p> <p>RENDER [1] - 96:2</p> <p>REPEAT [1] - 45:22</p> <p>REPEATED [1] - 63:11</p> <p>REPEATEDLY [6] - 9:8, 20:19, 28:24, 36:1, 39:1, 91:19</p> <p>REPLICATED [1] - 44:18</p> <p>REPORT [11] - 8:19, 12:16, 14:18, 15:16, 21:5, 28:4, 47:6, 50:21, 66:24, 68:8, 81:2</p> <p>REPORTED [1] - 97:2</p> <p>REPORTER [2] - 1:25, 98:15</p> <p>REPORTERS [1] - 4:18</p> <p>REPRESENT [4] - 48:7, 52:18, 91:8, 91:15</p> <p>REPRESENTATION [4] - 28:14, 28:17, 28:21, 57:13</p> <p>REPRESENTATIVE [2] - 51:21, 52:1</p> <p>REPRESENTATIVES [3] - 30:24, 38:17, 54:15</p> <p>REPRESENTED [1] - 52:21</p> <p>REPRESENTING [3] - 54:17, 58:10, 95:16</p> <p>REPUBLICAN [7] - 21:13, 21:24, 24:22, 75:12, 76:6, 76:12, 79:5</p> <p>REPUBLICANS [11] - 19:21, 20:6, 48:4, 58:24, 74:12, 81:14, 85:22, 85:24, 91:2, 91:12</p> <p>REQUEST [1] - 55:10</p> <p>REQUIRE [4] - 72:12, 82:5, 82:7, 82:8</p> <p>REQUIRED [4] - 39:21, 73:18, 85:6, 94:2</p> <p>REQUIREMENT [4] - 57:13, 71:24, 77:2, 84:20</p> <p>REQUIREMENTS [2] - 25:1, 48:22</p> <p>REQUIRES [2] - 39:12, 58:13</p> <p>RESEARCH [1] - 8:17</p> <p>RESERVE [2] - 4:6, 55:16</p> <p>RESIDE [1] - 51:15</p> <p>RESIDENT [1] - 51:25</p> <p>RESIDENTIAL [1] - 89:24</p> <p>RESIDENTS [3] - 11:9, 41:19, 52:13</p> <p>RESOLVE [2] - 14:8, 18:12</p> <p>RESOUNDING [1] - 74:22</p> <p>RESOURCES [1] - 53:16</p> <p>RESPECT [2] - 7:1, 20:22</p> <p>RESPECTFULLY [1] - 55:10</p> <p>RESPECTS [1] - 61:4</p> <p>RESPOND [4] - 21:4, 21:19, 30:24,</p>
---	--	---

<p>33:15 RESPONSE [3] - 26:12, 31:24, 47:6 RESPONSIBILITY [2] - 4:20, 56:14 RESPONSIVE [3] - 28:21, 80:23, 91:9 RESPONSIVENESS [7] - 28:13, 51:10, 80:8, 80:17, 80:22, 81:2, 81:4 REST [1] - 38:17 RESTRICTED [1] - 49:22 RESTRICTS [1] - 84:18 RESULT [6] - 25:12, 53:8, 59:16, 74:17, 77:1, 81:12 RESULTED [1] - 49:17 RESULTING [1] - 25:20 RESULTS [7] - 4:24, 5:6, 19:3, 19:9, 31:5, 32:10, 91:20 RETAIN [1] - 92:22 RETURN [2] - 51:22, 54:15 REVEAL [1] - 14:21 REVEALED [2] - 18:3, 75:25 REVEREND [4] - 34:14, 50:15, 50:23, 54:25 REVIEWED [1] - 5:1 REVIEWING [1] - 13:25 REVITALIZATION [1] - 52:8 RIGHTS [5] - 20:23, 30:7, 38:5, 38:7, 93:18 RIGHTS [25] - 33:5, 34:7, 34:19, 37:23, 42:3, 48:18, 53:22, 53:23, 55:12, 58:3, 59:17, 70:6, 71:7, 74:22, 84:18, 85:5, 85:25, 86:3, 86:17, 89:13, 89:14, 92:21, 93:8, 93:22, 94:4 RIPPLE [3] - 62:16, 62:18, 63:9 RISE [1] - 42:16 RISK [1] - 59:21 RMR [2] - 1:24, 98:15 ROBERTS [2] - 88:20, 89:17 ROBOCALLS [1] - 50:15 ROLE [7] - 56:17, 56:21, 70:20, 74:24, 78:16, 80:14, 86:9 ROLL [1] - 24:25 ROLLS [1] - 49:3 ROOM [1] - 32:8 ROOTED [2] - 21:12, 80:18 ROSS [1] - 2:15 ROUGHLY [1] - 87:6 RPR [1] - 1:24 RUCHO [1] - 70:22 RUIZ [1] - 2:8 RULE [5] - 50:4, 59:21, 71:16, 95:22, 95:23 RULE [1] - 50:13 RULED [1] - 45:6 RULES [1] - 26:18 RULING [1] - 96:20 RUN [5] - 51:25, 65:17, 80:5, 85:4, 88:22 RUNGS [1] - 50:9 RUNNING [2] - 79:2, 85:18 RUNS [1] - 66:7</p>	<p>RURAL [6] - 13:3, 13:6, 41:17, 41:24, 63:18 RUTAHINDURWA [1] - 2:11</p> <hr/> <p style="text-align: center;">S</p> <hr/> <p>S.B [1] - 28:9 SADLY [1] - 26:20 SAFE [2] - 37:25, 82:18 SANCTIONED [1] - 23:24 SATISFIED [3] - 28:4, 47:23, 93:22 SATISFIES [1] - 41:4 SAVITZKY [17] - 2:4, 3:6, 3:20, 4:1, 4:3, 4:5, 4:8, 4:15, 4:17, 12:11, 12:15, 14:4, 14:7, 32:6, 87:9, 88:3, 88:11 SAVITZKY [9] - 3:25, 4:5, 32:16, 45:23, 58:20, 70:14, 85:20, 87:6, 95:5 SAW [4] - 35:5, 37:24, 65:6, 74:23 SCARY [1] - 35:17 SCENARIO [1] - 61:8 SCHEDULED [1] - 3:23 SCHEMES [1] - 4:23 SCHOOL [1] - 51:13 SCORE [1] - 63:1 SCORES [2] - 8:1, 60:5 SCREEN [1] - 59:22 SEAT [1] - 52:1 SEATED [2] - 3:3, 55:23 SECOND [4] - 12:10, 42:14, 74:8, 95:9 SECRETARY [1] - 49:2 SECTION [52] - 14:25, 19:3, 24:16, 27:21, 31:16, 33:4, 33:8, 38:6, 38:11, 42:2, 48:18, 55:12, 56:6, 56:9, 56:10, 57:7, 57:12, 58:11, 58:13, 59:3, 59:11, 60:1, 65:22, 66:9, 70:17, 72:12, 77:14, 81:8, 81:17, 82:5, 84:16, 86:3, 88:16, 88:24, 88:25, 89:1, 89:13, 89:14, 89:18, 90:2, 90:13, 90:16, 90:22, 91:4, 91:20, 93:21, 94:9, 94:18, 94:19, 94:21 SEE [40] - 10:9, 18:7, 18:15, 20:1, 20:8, 20:17, 22:6, 22:25, 26:2, 26:4, 31:3, 57:24, 58:1, 59:19, 62:21, 64:6, 64:13, 65:4, 65:9, 65:16, 66:9, 67:18, 67:21, 68:10, 75:18, 76:13, 77:5, 78:5, 79:22, 81:15, 81:16, 81:20, 85:13, 89:25, 90:6, 90:14, 90:15, 91:3, 93:7 SEEK [1] - 48:2 SEEM [2] - 30:12, 39:1 SEES [1] - 87:13 SEGREGATION [2] - 89:25, 90:7 SELECTIVE [2] - 43:9, 43:16 SELF [2] - 31:14 SELF-LIQUIDATING [2] - 31:14 SENATE [52] - 10:1, 10:11, 17:25, 18:5, 23:8, 23:19, 23:20, 25:7, 26:19, 27:11, 27:23, 36:22, 44:3, 44:4, 45:22, 46:1, 46:15, 48:15, 49:23, 50:11, 50:20, 50:21, 51:3, 51:10, 51:16, 51:20, 52:24, 59:5, 59:6, 60:19, 60:21, 64:9,</p>	<p>64:10, 68:6, 68:7, 71:23, 72:24, 73:1, 73:3, 73:15, 73:22, 74:8, 76:23, 77:3, 77:6, 78:8, 79:19, 79:20, 80:8, 91:22, 92:10 SENATOR [5] - 34:22, 35:2, 77:1, 78:22, 79:2 SENSE [2] - 27:3, 95:10 SENSITIVITY [1] - 68:12 SEPTEMBER [1] - 98:9 SEPTEMBER [1] - 1:21 SERVE [1] - 9:19 SERVED [1] - 11:10 SERVICES [2] - 28:6, 52:15 SESSION [1] - 1:4 SET [5] - 13:16, 43:12, 43:13, 57:12, 57:13 SETS [1] - 68:15 SHADING [3] - 14:10, 14:13, 14:20 SHAMEFUL [1] - 30:12 SHARE [2] - 38:25, 61:10 SHARED [4] - 12:4, 61:15, 80:16, 81:4 SHARING [2] - 10:15, 13:7 SHEER [1] - 38:21 SHEET [1] - 74:21 SHELBY [1] - 89:17 SHERMAN [4] - 10:7, 10:20, 11:23, 28:14 SHIELD [1] - 62:17 SHIFTED [1] - 21:10 SHODDY [1] - 43:15 SHOPPING [1] - 10:9 SHORT [2] - 39:9, 47:4 SHOULDER [1] - 30:22 SHOW [15] - 6:5, 7:1, 15:8, 15:9, 16:6, 17:20, 19:6, 29:4, 39:17, 45:14, 53:1, 61:13, 76:10, 77:16, 83:25 SHOWED [4] - 7:16, 14:12, 25:25, 61:22 SHOWING [4] - 19:11, 29:5, 76:24 SHOWN [4] - 5:5, 5:15, 9:8, 34:3 SHOWS [22] - 5:22, 6:1, 6:15, 7:3, 18:13, 22:15, 23:19, 24:7, 25:7, 26:19, 30:7, 56:8, 74:9, 76:7, 77:22, 77:24, 78:11, 78:25, 81:10, 82:25, 86:13, 92:2 SHUT [8] - 5:12, 17:5, 17:15, 17:24, 23:17, 25:20, 29:14, 42:19 SIDE [3] - 19:8, 31:18, 60:8 SIDEWALKS [2] - 52:7, 80:12 SIGNAL [2] - 21:21, 21:23 SIGNIFICANT [2] - 35:15, 76:16 SIGNIFICANTLY [1] - 49:4 SIGNIFY [1] - 23:11 SIMILAR [9] - 11:18, 11:20, 13:7, 49:16, 60:6, 66:18, 68:10, 81:5 SIMILARLY [1] - 7:14 SIMPLY [5] - 20:24, 26:2, 37:21, 48:3, 75:15 SINGLE [8] - 9:5, 13:13, 38:10, 44:21, 44:23, 50:1, 64:17, 92:7</p>
--	---	--

<p>SINGULAR [1] - 43:24 SIT [1] - 71:21 SITUATION [5] - 5:18, 58:22, 76:13, 84:20, 85:16 SITUATIONS [2] - 56:16, 80:25 SIZE [1] - 42:4 SKIN [1] - 61:12 SKIP [1] - 71:11 SLIDE [6] - 13:12, 24:4, 72:5, 84:3, 87:13, 92:1 SLIDES [1] - 87:25 SLIGHTLY [1] - 42:11 SLIPPERY [1] - 93:18 SLOPE [1] - 93:18 SMALL [1] - 11:19 SMART [1] - 91:14 SO-CALLED [1] - 64:19 SOCIETY [3] - 58:4, 58:7, 90:18 SOCIOECONOMIC [12] - 10:6, 11:1, 12:4, 13:8, 26:16, 49:23, 50:1, 50:3, 62:2, 77:19, 81:5, 91:24 SOCIOECONOMICS [1] - 92:12 SOLELY [1] - 42:12 SOLOMON [1] - 74:13 SOMEONE [2] - 58:10, 62:24 SOMETIMES [1] - 26:13 SOMEWHAT [2] - 13:3, 95:15 SOON [2] - 96:1, 96:20 SOPHIA [1] - 2:3 SORRY [5] - 3:7, 14:6, 44:3, 70:8, 91:1 SORT [2] - 59:1, 73:24 SORTED [2] - 61:23, 81:22 SORTING [1] - 64:7 SOUGHT [1] - 11:1 SOUNDS [1] - 3:18 SOUTH [6] - 7:7, 10:1, 15:21, 16:18, 27:17, 30:17 SOUTH [2] - 65:18, 67:25 SOUTHERN [1] - 21:13 SOUTHWEST [7] - 7:12, 12:22, 13:2, 15:23, 16:19, 27:19, 30:18 SPARKS [1] - 2:12 SPEAKING [2] - 82:15, 90:11 SPEAKS [3] - 27:21, 31:12, 77:21 SPECIALLY [1] - 4:18 SPECIFIC [16] - 5:23, 6:23, 7:11, 8:24, 16:17, 23:14, 25:19, 27:14, 27:17, 39:14, 43:12, 43:13, 63:19, 74:3, 76:25, 93:2 SPECIFICALLY [6] - 34:13, 35:25, 83:5, 88:24, 89:18, 91:24 SPECTER [1] - 40:16 SPEND [1] - 11:12 SPENT [2] - 6:9, 71:13 SPLIT [2] - 11:3, 63:3 SPLITS [16] - 8:1, 8:2, 8:3, 11:2, 14:11, 61:22, 62:5, 63:8, 63:13, 63:14, 63:24, 64:4, 64:12, 64:15 SPLITTING [4] - 62:8, 62:13, 62:14,</p>	<p>65:16 SPRAWLING [1] - 43:1 SQUARE [1] - 11:14 STABILITY [2] - 75:12, 75:13 STABLE [1] - 75:9 STACEY [1] - 49:5 STAFF [4] - 4:18, 53:15, 87:2 STAGE [4] - 9:4, 15:3, 15:4, 19:2 STAMP [1] - 34:25 STAND [6] - 7:19, 9:7, 15:16, 21:6, 54:19, 88:7 STANDARD [16] - 6:12, 15:4, 29:8, 39:11, 39:12, 39:13, 39:15, 41:6, 45:6, 53:21, 89:1, 91:19, 93:21, 93:23, 93:24 STANDARDS [1] - 94:14 STANDING [1] - 54:9 STANDS [1] - 32:10 STARK [7] - 5:10, 18:19, 20:1, 20:9, 44:15, 48:3, 50:12 STARKLY [4] - 15:24, 16:13, 18:18, 93:1 START [15] - 3:4, 4:8, 32:18, 55:15, 58:23, 58:24, 60:24, 85:22, 85:23, 91:1, 91:2, 91:7, 95:18, 96:3 STARTED [2] - 53:25, 96:4 STARTING [2] - 18:5, 71:24 STARTS [2] - 9:23, 63:2 STATE [29] - 7:5, 7:11, 8:18, 15:20, 22:17, 23:15, 23:24, 24:21, 29:11, 30:16, 34:17, 35:10, 37:22, 38:2, 38:22, 41:11, 46:2, 48:17, 50:19, 50:24, 55:11, 57:10, 86:11, 88:5, 92:2, 92:19, 92:20, 92:24, 92:25 STATE [31] - 24:9, 28:5, 29:13, 34:6, 35:21, 37:11, 37:17, 37:19, 38:13, 39:9, 41:9, 43:23, 44:3, 44:4, 44:14, 44:17, 46:11, 49:2, 49:21, 52:25, 53:3, 53:20, 59:5, 59:6, 62:25, 63:2, 73:1, 82:12, 94:1, 95:23, 96:13 STATES [20] - 10:16, 25:22, 37:5, 38:8, 39:4, 39:8, 41:5, 49:12, 52:16, 52:24, 54:4, 54:18, 55:7, 55:15, 60:8, 61:5, 65:11, 73:11, 81:24, 93:10 STATE-SANCTIONED [1] - 23:24 STATEMENT [7] - 33:24, 34:13, 37:7, 39:16, 41:18, 46:17, 94:5 STATEMENTS [2] - 46:2, 87:16 STATES [4] - 1:1, 1:21, 1:25, 98:3 STATES [1] - 23:8 STATES [3] - 56:14, 57:10, 81:8 STATEWIDE [13] - 15:19, 34:3, 34:12, 34:25, 35:7, 35:9, 35:12, 35:15, 35:20, 79:2, 80:1, 80:5, 84:2 STATIC [1] - 7:17 STATING [1] - 42:15 STATISTICAL [1] - 74:21 STATISTICS [1] - 88:24 STATUS [4] - 50:3, 77:20, 78:11, 91:25 STATUTE [3] - 23:3, 28:7, 28:8</p>	<p>STAVE [1] - 55:7 STAY [2] - 8:12, 76:3 STENOGRAPHICALLY [1] - 1:23 STEPS [1] - 27:25 STEVE [1] - 1:20 STICKS [1] - 54:6 STILL [12] - 3:22, 14:4, 22:1, 22:6, 23:12, 24:12, 26:8, 33:23, 40:1, 51:5, 66:15, 86:4 STIPULATED [5] - 16:3, 45:8, 45:9, 45:11, 45:14 STIPULATIONS [1] - 45:17 STONECREST [2] - 10:22, 68:9 STOP [5] - 3:16, 31:9, 31:19, 31:21 STORE [1] - 52:10 STORES [1] - 11:10 STORY [4] - 34:15, 36:3, 40:17 STRAIGHTFORWARD [1] - 6:12 STREETLIGHTS [2] - 52:7, 80:12 STRENGTH [4] - 28:18, 35:23, 37:22, 55:9 STRETCHED [1] - 10:16 STRETCHES [1] - 63:22 STRIKES [1] - 67:23 STRIKING [1] - 90:15 STRIPED [1] - 82:6 STRONG [1] - 27:10 STRUCK [1] - 24:15 STRUCTURES [1] - 32:1 STRUGGLE [1] - 55:2 STUDY [1] - 46:13 SUBJECT [1] - 48:18 SUBMERGE [3] - 16:8, 16:10, 31:17 SUBMERGED [1] - 16:14 SUBMERGENCE [5] - 5:21, 6:3, 16:9, 31:4, 31:19 SUBMIT [15] - 14:7, 34:24, 35:17, 56:7, 59:13, 60:18, 67:1, 68:22, 73:14, 73:18, 76:20, 82:10, 85:4, 92:15, 94:3 SUBMITTED [3] - 29:3, 29:5, 69:6 SUBSTANTIAL [1] - 86:23 SUBSTANTIALLY [1] - 41:2 SUBSTANTIVE [1] - 3:9 SUBURBAN [5] - 10:5, 10:14, 11:16, 11:18 SUBURBANIZATION [1] - 7:9 SUCCEED [4] - 18:11, 33:10, 74:5, 78:13 SUCCEEDING [2] - 79:3, 83:7 SUCCESS [18] - 16:21, 34:5, 34:11, 34:24, 35:2, 49:21, 51:3, 51:4, 51:6, 74:22, 79:22, 80:2, 82:20, 83:21, 84:4, 84:7, 84:10, 84:11 SUCCESSFUL [2] - 24:21, 50:23 SUCCESSFULLY [1] - 8:11 SUFFER [1] - 50:6 SUFFICIENTLY [1] - 40:11 SUGGESTED [1] - 25:25 SUGGESTION [1] - 22:13</p>
--	---	---

<p>SUMMARY [4] - 14:11, 46:23, 60:11, 60:17 SUNSET [2] - 89:16, 89:20 SUPER [1] - 35:6 SUPPORT [4] - 22:13, 22:14, 76:11, 84:8 SUPPORTED [3] - 13:13, 18:3, 75:22 SUPPORTING [3] - 6:24, 15:25, 86:23 SUPPOSED [3] - 58:16, 59:4, 59:11 SUPPRESSING [1] - 92:22 SUPPRESSION [1] - 49:9 SUPREME [11] - 5:1, 13:13, 33:5, 33:12, 56:11, 61:2, 70:22, 82:18, 84:14, 84:19, 88:20 SUREST [4] - 18:23, 20:10, 29:25, 76:18 SURPASSES [1] - 41:5 SUSPECT [2] - 38:4, 44:18 SWITCH [3] - 37:5, 37:20 WORD [1] - 62:17 SYSTEM [13] - 26:18, 34:2, 56:8, 57:25, 72:13, 72:14, 79:14, 79:15, 80:6, 83:10, 85:10, 85:15, 90:18</p>	<p>27:11, 27:13, 27:24, 28:3, 28:10, 28:15, 44:7, 47:15, 47:23, 48:17, 50:2, 52:17, 65:12, 69:3, 73:19, 74:21, 75:19, 77:6, 79:24 TESTIFY [3] - 6:20, 46:8, 54:18 TESTIFYING [1] - 61:14 TESTIMONY [18] - 8:10, 8:19, 8:24, 11:6, 11:8, 13:15, 15:18, 19:17, 19:18, 26:24, 43:17, 52:5, 67:13, 69:20, 72:19, 72:22, 81:10 TESTING [1] - 90:17 TESTS [1] - 53:8 TEXT [1] - 57:7 THANKSGIVING [2] - 96:23, 96:24 THE [32] - 1:2, 1:20, 2:2, 2:13, 3:3, 3:11, 3:14, 3:17, 3:22, 4:2, 4:4, 4:7, 4:13, 4:16, 12:10, 12:14, 14:2, 14:6, 32:5, 32:16, 32:21, 55:13, 55:18, 55:20, 55:23, 87:5, 87:8, 87:20, 88:1, 88:10, 94:24, 95:1 THEMSELVES [3] - 28:4, 75:16, 91:9 THEREFORE [3] - 19:21, 19:23, 26:10 THEY'VE [3] - 25:4, 36:1, 89:11 THIN [2] - 19:25, 35:7 THINKING [1] - 6:16 THINKS [1] - 9:5 THINNER [1] - 82:6 THIRD [1] - 35:8 THOMASVILLE [1] - 13:1 THOROUGH [1] - 88:10 THOROUGHLY [2] - 91:19, 95:25 THOUGHTFUL [1] - 81:13 THOUSAND [1] - 79:1 THREAD [1] - 54:5 THREAT [1] - 37:12 THREE [2] - 42:15, 94:7 THROUGHOUT [1] - 47:25 THROW [2] - 54:5, 73:15 THURSDAY [1] - 1:21 TIGHT [2] - 8:12, 69:22 TIRED [6] - 53:19, 54:8, 54:10, 54:13, 54:16, 54:22 TIRELESS [2] - 4:19, 54:22 TJOFLATS [1] - 18:20 TODAY [16] - 3:13, 4:12, 24:6, 24:9, 25:6, 47:15, 48:1, 56:11, 57:18, 60:20, 75:19, 75:20, 78:21, 78:23, 84:10, 86:6 TOGETHER [4] - 12:12, 13:1, 34:16, 42:16 TOMORROW [1] - 73:7 TOOK [1] - 5:1 TOOL [1] - 65:2 TOP [4] - 48:14, 57:21, 63:7, 88:15 TORO [1] - 2:8 TOTAL [1] - 36:19 TOTALITY [18] - 5:25, 15:6, 16:25, 17:9, 18:4, 19:1, 23:1, 31:2, 42:21, 45:20, 46:7, 46:25, 70:14, 71:12, 71:18, 72:4, 79:9, 92:6</p>	<p>TOUCH [1] - 9:24 TOWARD [1] - 76:3 TOWARDS [2] - 61:1, 63:15 TRACI [2] - 11:6, 25:11 TRADE [2] - 37:13, 71:3 TRADED [1] - 38:6 TRADITIONAL [20] - 5:9, 6:14, 7:21, 13:24, 14:17, 39:19, 39:21, 40:13, 40:23, 41:4, 41:10, 43:6, 43:8, 44:12, 44:22, 48:19, 61:4, 66:15, 67:9, 69:9 TRADITIONALLY [1] - 80:17 TRAIT [1] - 48:9 TRANSCRIPT [1] - 1:20 TRANSCRIPT [3] - 34:12, 39:23, 98:7 TRANSCRIPTS [1] - 3:10 TRANSITION [1] - 16:25 TRANSPORTATION [3] - 12:23, 52:7, 80:16 TREAT [1] - 84:13 TREMENDOUS [1] - 12:1 TREND [1] - 35:4 TRENDING [1] - 83:22 TRENDS [1] - 7:8 TRIAL [1] - 1:20 TRIAL [19] - 3:13, 5:5, 7:3, 9:7, 14:12, 17:19, 17:20, 17:21, 18:2, 18:12, 19:15, 20:14, 23:19, 32:11, 39:23, 54:1, 56:4, 73:2, 87:3 TRIALS [1] - 33:2 TRIED [4] - 13:18, 33:5, 47:1, 64:23 TRIES [1] - 53:22 TROPES [1] - 27:1 TROUBLE [1] - 92:4 TROUBLESOME [1] - 90:18 TRUE [7] - 26:17, 36:20, 45:17, 52:12, 76:19, 91:3, 98:6 TRULY [3] - 26:14, 54:21, 82:24 TRY [15] - 19:10, 19:11, 28:23, 37:21, 45:22, 47:11, 54:1, 54:5, 55:7, 59:1, 95:19, 95:25, 96:17, 96:19, 96:21 TRYING [11] - 19:15, 40:19, 40:22, 53:19, 57:1, 59:15, 59:24, 68:21, 87:23, 91:8, 92:22 TSAI [1] - 2:6 TURN [5] - 18:4, 23:1, 39:15, 42:23, 78:3 TURNED [1] - 61:17 TURNING [1] - 45:5 TURNOUT [11] - 25:18, 25:21, 25:25, 26:3, 26:8, 30:5, 77:21, 77:23, 78:5, 78:9 TWO [15] - 4:9, 4:19, 6:7, 6:9, 6:11, 33:2, 34:24, 40:18, 53:11, 54:4, 54:9, 59:24, 70:19, 87:25, 95:5 TYPE [2] - 27:21, 67:3 TYPES [1] - 6:15 TYPICALLY [1] - 16:6 TYSON [4] - 2:14, 3:21, 55:25, 87:22 TYSON [20] - 6:7, 13:20, 14:24, 23:3,</p>
T		
<p>TACTICS [1] - 25:3 TAGS [1] - 10:10 TAIL [1] - 11:17 TANGER [1] - 11:24 TANGIBLE [1] - 52:6 TARGET [2] - 63:15, 82:7 TARGETED [1] - 27:5 TARNISH [1] - 28:19 TAXES [1] - 23:9 TAYLOR [1] - 41:20 TEACH [2] - 51:19, 62:25 TEACHER [1] - 51:13 TEACHING [1] - 54:13 TECHNIQUE [4] - 44:8, 44:15, 44:17, 68:11 TECHNIQUES [6] - 63:16, 63:17, 63:19, 66:10, 67:22, 81:19 TEN [4] - 32:17, 55:14, 56:13, 58:5 TEN-MINUTE [2] - 32:17, 55:14 TEND [2] - 48:15, 78:3 TENETS [1] - 33:4 TERM [1] - 21:17 TERMS [11] - 6:18, 7:25, 9:17, 58:13, 58:25, 67:8, 69:22, 70:12, 70:20, 75:20, 83:21 TEST [12] - 5:6, 19:9, 31:6, 32:10, 33:8, 33:9, 33:12, 33:14, 33:17, 63:1, 85:3, 91:20 TESTED [1] - 33:5 TESTIFIED [49] - 10:2, 10:7, 10:12, 10:21, 11:13, 11:23, 12:2, 12:12, 12:22, 13:5, 13:22, 16:12, 16:17, 18:17, 20:19, 21:5, 21:16, 22:3, 22:7, 22:16, 24:8, 24:11, 24:18, 24:19, 25:11, 25:13, 26:1, 26:15, 26:21, 27:6,</p>		

<p>23:21, 28:23, 31:7, 33:25, 34:13, 37:8, 39:17, 46:17, 55:24, 87:5, 87:15, 87:21, 88:14, 89:9, 90:24, 94:5 TYSON'S [2] - 13:18, 91:21</p>	V	<p>80:7, 80:16, 80:24, 81:4, 81:25, 84:8, 85:10, 85:12, 85:23, 86:10, 86:12, 90:1, 91:11, 91:14, 93:5, 93:9 VOTERS' [9] - 16:5, 22:14, 25:23, 31:4, 31:18, 31:23, 50:17, 83:6, 83:7 VOTES [4] - 57:3, 63:24, 81:25, 83:6 VOTING [9] - 4:23, 5:10, 5:11, 5:19, 15:2, 15:9, 15:11, 15:13, 15:18, 15:24, 16:1, 16:2, 16:4, 16:8, 16:14, 16:21, 17:6, 17:15, 18:17, 18:23, 19:22, 20:2, 20:9, 20:16, 22:4, 22:21, 22:25, 23:18, 24:3, 24:18, 25:24, 26:5, 26:11, 26:23, 28:18, 29:14, 29:15, 29:21, 29:25, 31:5, 31:9, 31:15, 31:16, 31:19, 35:23, 36:2, 37:3, 37:21, 38:2, 38:5, 38:15, 46:1, 46:9, 46:16, 48:4, 48:5, 48:15, 48:19, 48:24, 49:22, 50:24, 55:8, 56:8, 57:2, 58:21, 58:22, 58:23, 58:24, 72:22, 74:16, 74:17, 75:8, 75:15, 75:19, 75:20, 76:14, 76:16, 76:18, 76:23, 77:6, 78:5, 85:21, 85:22, 85:23, 90:14, 90:25, 91:1, 91:2, 91:6, 93:18 VOTING [25] - 33:5, 34:7, 34:18, 37:23, 42:3, 48:18, 53:22, 53:23, 55:12, 58:3, 59:17, 70:6, 71:7, 74:22, 84:18, 85:5, 85:25, 86:3, 86:17, 89:13, 89:14, 92:20, 93:8, 93:22, 94:4 VOTING-RELATED [2] - 46:1, 46:9 VRA [2] - 31:11, 31:13 VS [3] - 1:6, 1:11, 1:16 VTD [4] - 8:1, 9:15, 12:6, 12:20 VTDS [1] - 8:15</p>
U	<p>VALUE [1] - 29:4 VALUES [1] - 20:24 VAP [1] - 81:23 VARGHESE [1] - 2:8 VARIETY [2] - 64:2, 83:4 VARIOUS [12] - 6:21, 6:22, 21:8, 42:12, 43:18, 61:25, 62:5, 63:17, 69:3, 69:18, 84:4, 87:16 VAST [2] - 51:17, 89:3 VENTURE [1] - 40:21 VERA [1] - 81:7 VERDICT [1] - 86:21 VERGE [1] - 35:14 VERIFICATION [1] - 49:12 VERSUS [2] - 66:9, 70:12 VIEW [9] - 25:23, 38:9, 46:12, 58:18, 60:16, 61:5, 61:6, 66:6, 91:9 VINDICATE [1] - 70:23 VIOLATED [1] - 77:12 VIOLATION [7] - 42:1, 59:3, 86:16, 89:23, 90:2, 90:13, 94:20 VIOLATIONS [2] - 55:11, 91:4 VIOLENCE [1] - 49:17 VIRTUALLY [1] - 5:1 VISIBLE [1] - 67:21 VOICES [2] - 31:4, 31:18 VOLUNTEERED [1] - 28:15 VOTE [37] - 4:22, 5:15, 9:20, 19:11, 20:6, 20:24, 22:17, 26:2, 28:12, 35:22, 42:3, 49:19, 51:1, 53:4, 53:5, 53:6, 53:8, 53:9, 54:23, 57:19, 57:20, 72:21, 74:12, 75:11, 75:12, 76:4, 76:7, 77:2, 85:11, 85:12, 86:24, 90:9, 91:1, 91:14, 91:15 VOTED [3] - 19:20, 19:21, 49:5 VOTER [20] - 15:8, 18:7, 18:14, 19:24, 21:22, 23:6, 24:25, 25:1, 28:12, 47:19, 48:21, 48:23, 49:3, 49:9, 49:15, 49:16, 50:3, 86:24, 89:19 VOTERS [3] - 19:8, 54:17, 70:15 VOTERS [123] - 5:11, 5:20, 15:19, 15:24, 15:25, 16:10, 16:14, 16:15, 16:20, 17:5, 17:7, 17:15, 17:23, 19:5, 19:20, 19:25, 20:5, 20:6, 20:21, 20:24, 21:3, 21:12, 21:15, 21:19, 21:24, 21:25, 22:13, 23:17, 23:25, 25:6, 25:8, 25:14, 25:18, 25:20, 26:1, 26:22, 27:2, 28:19, 29:14, 30:6, 34:8, 35:11, 35:13, 37:16, 37:21, 38:6, 38:20, 38:25, 39:1, 41:14, 44:20, 45:3, 45:9, 45:11, 47:21, 47:24, 48:3, 48:4, 48:5, 48:13, 48:20, 49:3, 49:13, 49:14, 49:19, 50:6, 51:1, 52:5, 54:10, 56:9, 56:18, 57:19, 58:23, 58:24, 60:18, 61:10, 61:15, 63:18, 63:19, 63:20, 69:17, 71:1, 72:8, 74:5, 74:11, 74:12, 74:24, 75:2, 75:11, 75:12, 75:14, 75:21, 76:2, 76:7, 76:10, 77:16, 77:24, 77:25, 78:3, 78:20, 79:8,</p>	
<p>ULTIMATE [5] - 19:5, 22:21, 23:3, 29:8, 40:10 ULTIMATELY [22] - 27:5, 56:25, 59:2, 62:11, 62:24, 64:6, 66:2, 67:1, 67:19, 70:25, 71:5, 74:9, 77:15, 78:2, 78:12, 79:11, 82:5, 82:10, 83:24, 85:5, 85:16, 86:14 UNABLE [1] - 72:21 UNAIDED [1] - 30:23 UNCERTAIN [1] - 9:17 UNCONTESTED [1] - 16:13 UNDENIABLE [1] - 54:2 UNDER [17] - 24:16, 36:1, 37:5, 38:6, 38:8, 38:10, 42:2, 45:6, 49:12, 50:13, 51:15, 58:17, 60:10, 85:3, 85:25, 91:20, 94:2 UNDERREPRESENTATION [4] - 27:12, 27:14, 27:24, 30:15 UNDERSTOOD [2] - 8:10, 28:16 UNDISPUTED [2] - 19:19, 22:24 UNELECTABLE [1] - 27:2 UNEQUAL [3] - 19:5, 26:15, 52:15 UNEVEN [1] - 43:10 UNIFORMLY [1] - 90:12 UNIQUE [1] - 11:7 UNITED [1] - 23:8 UNITED [4] - 1:1, 1:21, 1:25, 98:3 UNITED [1] - 10:24 UNITING [1] - 11:22 UNITY [1] - 34:17 UNLAWFUL [3] - 33:7, 49:10, 55:7 UNLESS [4] - 12:8, 16:15, 87:10, 88:8 UNLIKE [3] - 35:20, 86:7, 89:13 UNMET [1] - 30:22 UNREBUTTED [1] - 27:16 UNSPPLITTING [1] - 62:8 UNSTATED [1] - 28:25 UNTOUCHED [1] - 5:2 UNUSUAL [5] - 5:14, 6:1, 17:2, 89:2, 90:20 UNWILLING [1] - 76:11 UP [20] - 5:1, 6:23, 13:20, 14:14, 18:2, 18:13, 24:22, 29:23, 37:6, 44:9, 49:8, 54:9, 60:2, 63:23, 64:5, 65:16, 68:24, 82:12, 92:1, 93:10 UPSETTING [1] - 9:10 URBAN [1] - 41:24 US [4] - 33:5, 33:12, 56:11, 88:19 USES [1] - 6:19 USUAL [3] - 92:18, 92:19, 92:21 UTOPIA [1] - 35:3</p>	W	<p>WAIVE [2] - 48:2, 48:11 WAIVER [1] - 9:13 WAKE [1] - 49:20 WALK [3] - 33:14, 45:21, 56:23 WALKER [2] - 78:22, 79:6 WALKING [1] - 84:3 WALL [1] - 54:6 WALTON [1] - 10:17 WANTS [2] - 39:9, 52:11 WAR [1] - 21:7 WARD [4] - 20:18, 21:5, 23:23, 24:17 WARNOCK [7] - 23:7, 34:14, 34:22, 50:15, 50:23, 78:22, 79:2 WARNOCK'S [1] - 35:2 WASH [1] - 38:18 WATCHING [1] - 95:3 WATER [1] - 52:10 WAYS [9] - 12:24, 24:22, 24:24, 47:24, 55:8, 62:25, 67:12, 73:1 WEAVES [1] - 53:21 WEEK [4] - 3:9, 73:7, 83:11, 95:2 WEEKS [10] - 4:19, 6:7, 6:9, 32:24, 42:20, 53:11, 53:14, 54:4, 54:9, 94:7 WEIGEL [1] - 2:16 WEIGHT [3] - 78:11, 79:13, 79:17</p>

WERE ^[1] - 97:2
WEST ^[1] - 10:25
WESTERN ^[2] - 37:16, 45:1
WHATSOEVER ^[1] - 47:6
WHITCOMB ^[1] - 94:16
WHITE ^[47] - 7:13, 15:25, 19:20, 20:6,
 20:20, 21:25, 22:14, 25:18, 26:3, 26:6,
 34:16, 35:6, 35:11, 35:18, 39:1, 39:2,
 39:5, 39:7, 39:8, 44:20, 45:11, 45:14,
 48:4, 48:5, 49:25, 58:23, 60:18, 63:18,
 63:20, 67:25, 68:5, 72:8, 74:11, 75:2,
 75:12, 75:14, 75:21, 76:1, 76:2, 76:7,
 76:10, 77:25, 78:3, 81:21, 83:14,
 83:18, 91:12
WHOLE ^[5] - 8:16, 11:1, 72:5, 95:22,
 96:16
WIDELY ^[1] - 81:4
WIDESPREAD ^[2] - 48:25, 84:7
WILLIAMS ^[1] - 2:5
WILLING ^[2] - 40:21, 76:7
WILLINGNESS ^[2] - 30:23, 54:23
WIN ^[4] - 34:3, 71:15, 80:2, 86:12
WINNER ^[1] - 57:20
WINNING ^[1] - 80:6
WINS ^[2] - 59:19
WISDOM ^[1] - 18:22
WISH ^[1] - 88:18
WOEFULLY ^[1] - 47:3
WOMEN ^[2] - 19:8, 70:15
WON ^[4] - 30:7, 50:23, 83:16, 83:19
WORD ^[2] - 31:14, 94:9
WORDS ^[6] - 16:7, 41:9, 48:2, 59:22,
 61:16, 91:20
WORLD ^[3] - 66:13, 71:8, 85:7
WORSE ^[7] - 25:8, 29:1, 29:5, 29:7,
 29:10, 30:13, 49:25
WORTH ^[3] - 34:22, 56:24, 81:7
WRIGHT ^[3] - 52:16, 65:23, 66:8
WRIGHT'S ^[1] - 81:10
WRITTEN ^[1] - 37:23
WROTE ^[2] - 18:22, 89:17

Y

YEAR ^[2] - 34:23, 74:10
YEARS ^[12] - 27:20, 33:1, 34:24, 34:25,
 35:5, 37:24, 40:19, 41:8, 52:17, 78:4,
 80:19
YESTERDAY ^[1] - 64:18
YIELDS ^[1] - 94:19
YOU-ALL ^[11] - 3:3, 3:23, 55:23, 88:10,
 95:10, 95:12, 96:2, 96:11, 96:12,
 96:14

Z

ZABEL ^[1] - 2:9
ZERO ^[1] - 37:21

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF GEORGIA

_____)	
)	
Plaintiff(s))	
)	Case No. _____
V.)	
)	
_____)	
Defendant(s))	

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FOR THE NORTHERN DISTRICT OF GEORGIA

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)	
Plaintiff(s))	
)	Case No. _____
V.)	
)	
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