

1 IN THE COMMONWEALTH COURT OF PENNSYLVANIA
2 - - -
3 VIVIETTE APPLEWHITE; WILOLA :
SHINHOLSTER LEE; GROVER FREELAND; :
4 GLORIA CUTTINO; NADINE MARSH; :
DOROTHY BARKSDALE; BEA BOOKLER; :
5 JOYCE BLOCK; HENRIETTA KAY :
DICKERSON; DEVRA MIREL ("ASHER") :
6 SCHOR; THE LEAGUE OF WOMEN VOTERS :
OF PENNSYLVANIA; NATIONAL :
7 ASSOCIATION FOR THE ADVANCEMENT :
OF COLORED PEOPLE, PENNSYLVANIA :
8 STATE CONFERENCE; HOMELESS :
ADVOCACY PROJECT, :
9 :
Petitioners, : C.A. No.
10 :
vs. : 330 M.D. 2012
11 :
THE COMMONWEALTH OF :
12 PENNSYLVANIA; THOMAS W. CORBETT, :
in his capacity as Governor; :
13 CAROLE AICHELE, in her capacity :
as Secretary of the Commonwealth, :
14 :
Respondents. :
15 _____ :
16
17

18 Videotape Deposition of MARION BAKER
19 taken at [REDACTED]
20 Reading, Pennsylvania
21 Wednesday, June 26, 2013
22 12:17 p.m.
23
24 Gail L. Inghram Verbano, CSR, RDR, CRR
25

16 Q Would you please state your name for
17 the record.

18 A Marion Baker.

19 Q And where do you live?

20 A ██
21 Pennsylvania.

22 Q That's where we are right now?

23 A Yes.

24 Q How long have you lived in this home?

25 A About 13 years.

1 Q How long have you lived in

2 Pennsylvania?

3 A All my life.

4 Q Were you born in Pennsylvania?

5 A Yes.

6 Q And are you currently employed?

7 A No. I'm retired.

8 Q And how were you formerly employed?

9 A Giant Food Stores as a cashier.

10 Q About how long did you work there?

11 A 17 years.

12 Q And are you married?

13 A My husband died two years ago.

14 Q And do you have any family nearby?

15 A Yes.

16 Q Who lives nearby?

17 A My daughter.

18 Q And do you have any children other than

19 this daughter?

20 A No. She's the only one.

21 Q And how close by does she live?

22 A About four blocks.

23 Q And do you have any grandchildren?

24 A Yes.

25 Q How many grandkids?

1 A Eight.

2 Q And what are the ages, the range of
3 ages of your grandchildren?

4 A 16 to 1 year.

5 Q Mrs. Baker, how do you get around?

6 A By my son-in-law or my daughter;
7 sometimes my brother.

8 Q And you're referring to if you need to
9 go somewhere by --

10 A Yeah.

11 Q Somewhere outside the house?

12 A Yes.

13 Q How do you get around the neighborhood?
14 Do you walk without assistance or use a wheelchair
15 or what?

16 A I use a walker, but I don't usually go
17 around the neighborhood. I use a walker in the
18 house.

19 Q And how long have you been using a
20 walker?

21 A Since 2008 -- well, no, no, no. I'm
22 wrong. I was in a wheelchair first, and then went
23 to the walker. And that's been 2008.

24 Q Okay. And what happened that made you
25 start using a wheelchair or a walker?

1 A I was at the Giant Center in Hershey at
2 a concert. I fell and my broke my leg. They took
3 me to Hershey Medical Center and done surgery. And
4 in the middle of surgery, I had a heart attack. So
5 I -- I was in the medical center for like 14 days
6 in intensive care up there.

7 And then when I came -- they
8 transferred me to Reading. Then I went to a
9 nursing home, and then I came home. And that's
10 when I -- I've been recuperating since then.

11 Q Okay. Now, I want to ask you a few
12 questions about voting. Are you registered to
13 vote?

14 A Yes.

15 Q And how often do you vote?

16 A Every election.

17 Q Do you remember the first time you
18 voted?

19 A Yes; 1960.

20 Q And have you ever run for any elected
21 position?

22 A Yes.

23 Q What was that?

24 A Committeewoman.

25 Q And where were you -- were you elected?

1 A Yes.

2 Q And how long did you serve as a
3 committeewoman?

4 A I served two terms, which was two-year
5 terms. So four years altogether, but two different
6 terms.

7 Q And about when was that?

8 A Back in the 1980s.

9 Q And were you committeewoman here in
10 Reading?

11 A Yes.

12 Q Was it for a specific political party?

13 A Republicans.

14 Q And since then have you had any other
15 involvement in any campaigns?

16 A Just volunteering and doing advertising
17 for them.

18 Q And when you vote, do you vote in
19 person or by absentee ballot?

20 A In person.

21 Q Have you ever voted absentee?

22 A One time when I was in the hospital.

23 Q And that was, I think you said, about
24 2008?

25 A Yeah.

1 Q Where is your polling place?

2 A The library up on 11th Street.

3 Q And about how far away is that?

4 A About three blocks.

5 Q And how long have you been voting at
6 that library?

7 A The 13 years that I've lived here.

8 Q How do you get to the library from
9 here?

10 A Either my daughter or my son-in-law
11 will take me.

12 Q They drive you by car?

13 A Yes.

14 Q And this is the couple with eight kids?

15 A Yes.

16 Q And by the way, are your daughter and
17 son-in-law both employed?

18 A Yes.

19 Q And what kind of work do they do?

20 A She's a waitress, and he works at a
21 furniture factory up in Leesport.

22 Q Do they work 9:00 to 5:00?

23 A No.

24 Q What kind of hours do they work?

25 A He goes to work at 2:00 in the morning

1 and works until 2:00 in afternoon. And she goes to
2 work at 4:00 and works 4:00 to 11:00 or 12:00 or
3 whatever.

4 Q And so they're both off work only for a
5 couple hours in the day?

6 A Yes.

7 Q And what time of day do you go to vote
8 when you go?

9 A Usually while they're -- when they're
10 home, late in the afternoon.

11 Q Is the polling place that you go to
12 accessible to you, given that you use a walker?

13 A Yes. It's right in off the street. No
14 steps -- no step-ups or nothing. It's just even
15 with the sidewalk.

16 Q And what kind of a wait do you
17 typically encounter on Election Day?

18 A Not very long the time I go. It's
19 usually -- I guess the longest I've ever waited was
20 like 20 minutes to a half hour. Usually they
21 aren't too busy. When I'm leaving there, it's
22 starting to get really busy.

23 Q Is there anywhere that you can sit or
24 take a rest at the polling place if --

25 A Yes. They have chairs in there.

1 Q Okay. Now, to get -- if you wanted to
2 vote absentee, you would have to sign a legal
3 declaration stating that you're unable to attend
4 your polling place because of an illness or
5 physical disability. Could you sign a declaration
6 stating that?

7 A Not right at this time, because I can
8 get out.

9 Q Okay. And how would you feel about
10 voting absentee versus voting in person?

11 A It doesn't really matter to me. But I
12 think it's more -- if you go there, I always
13 think -- well, the one time I did vote absentee, I
14 thought is my -- is my vote really counting or did
15 it get lost? I think if you go there, you vote;
16 you know it's being counted. At the time I had
17 that question, did my vote really count?

18 Q Okay. Now, did you vote in the
19 November 2012 election?

20 A Yes.

21 Q And did the poll workers when you went
22 to vote say anything to you about photo ID?

23 A Yes. They told me that -- did I have
24 one. And I said, yes, but it was expired.

25 And they said, Well, this is the last

1 time you can vote unless you get a new one. The
2 next election, you're not allowed to vote.

3 Q So have you voted since then?

4 A No, because -- the May 2013, I didn't
5 get it renewed yet, so I couldn't vote that time.

6 Q And what made you think that you
7 couldn't vote that day?

8 A Because they told me. I mean, they
9 told me the day -- before that the law would take
10 effect and I wouldn't be allowed to vote if I
11 didn't get it updated, and so I didn't even bother
12 to go out. First time in my life that I could vote
13 that I did not vote. I voted every election except
14 for May.

15 Q When you said they told you, who is
16 "they"?

17 A At the precinct, the workers.

18 Q The polling workers?

19 A Uh-huh.

20 Q Okay. Now, have you ever had a
21 Pennsylvania driver license?

22 A Yes.

23 Q And do you currently drive?

24 A I could, but the doctors aren't letting
25 me drive right now. I'm still -- my reflexes

1 aren't good enough for driving yet.

2 Q So do you have any sort of ID from
3 PennDOT right now?

4 A Just the voter -- just the ID which is
5 expired, because I don't have -- I don't have a
6 driver's license right now.

7 Q And do you remember about when that ID
8 expired?

9 A 2011.

10 Q Do you have a U.S. passport?

11 A No.

12 Q Do you have any other ID with your
13 picture on it?

14 A No.

15 Q So the ID that you -- that expired in
16 2011, where did you go to get that ID?

17 A PennDOT over in Shillington.

18 Q And is the Shillington PennDOT the
19 closest location to you?

20 A Yes, it's the only one in Berks County.

21 Q Did you have to wait in line when you
22 went to get that?

23 A Yes.

24 Q Do you remember about how long you had
25 to wait?

1 A Four years. I remember. Four hours.
2 That's just to get in the door. Once I got in the
3 door, I waited another like hour and a half inside.

4 Q When you say "to get in the door," were
5 people lined up outside the building?

6 A Yes; all the way down and around the
7 building.

8 Q Okay. And was there something unusual
9 about that day that made the line so along?

10 A No. It was just a regular day. It was
11 a weekday.

12 Q Have you -- have you ever seen a line
13 there on any other occasions like that?

14 A Yes. Every time you go by, it's lined
15 up.

16 Q Now, have you ever tried to renew the
17 ID that expired in 2011?

18 A No. I called PennDOT to renew it to
19 see if they had any -- any way that a handicapped
20 person could get in without standing in line,
21 because I could never stand in line that long. And
22 they told me, no, that I would have to come and
23 stand in line like everybody else.

24 Q Do you remember when you called?

25 A It was right after the November

1 election, maybe -- maybe like the beginning of the
2 year, the end -- the end of the year, the beginning
3 of the year when I started thinking about -- I had
4 to do something to get voted -- so I could vote.

5 Q When you say "November election," you
6 mean the November 2012?

7 A Yes; after that election.

8 Q Did you call -- you said you called
9 PennDOT. Did you call PennDOT headquarters in
10 Harrisburg, or where did you call?

11 A I called PennDOT in Shillington.

12 Q Okay. And so were you able to renew
13 that ID?

14 A No. I didn't get it renewed yet
15 because I just feel I'm never going to be able to
16 go there and stand.

17 Q How would you -- is that PennDOT office
18 within -- how far away is it to that Shillington
19 PennDOT office?

20 A From my house, it would be about
21 15 minutes, with traffic.

22 Q And that's by car?

23 A Yes.

24 Q Okay. And so how would you get there?

25 A My daughter or my son-in-law would take

1 me.

2 Q And could they do that -- could they
3 take off work to do that, or when would they do
4 that?

5 A Would be when they aren't working.
6 That's one reason why I haven't gone, because you
7 don't know how long you're going to be standing
8 there, tied up there. And they can't sit there
9 forever, waiting for me.

10 Q Okay. Is there any city bus that you
11 can take to get there?

12 A Yes.

13 Q And do you use the city buses?

14 A Not since I've been hurt. I can't --
15 I'd have a hard time -- I'd have to walk to a bus
16 stop. Then when you get off over there, you still
17 got a block to go to get to the -- before you're
18 even at the PennDOT.

19 Q What about paratransit; are there any
20 paratransit opportunities for you?

21 A There would be, but you got to
22 register. It's a lot of -- like I checked into
23 it -- when my husband lived, he checked into it.
24 And it was more bother than -- you have to pay.
25 And they come at their convenience, whether -- you

1 know, you have to wait until they can take you
2 because they have so many, I guess, that go. You
3 have to wait until they can pick you up and take
4 you. So you would be waiting forever for them.

5 Q Okay. How do you get around to things
6 like doctor's appointments or other errands?

7 A My daughter and my son-in-law; and once
8 in a while if I need to, my brother will take me.

9 Q Does your brother live here in Reading?

10 A No. He lives in Boyertown.

11 Q About how far away is that?

12 A About a half hour.

13 Q Okay. And since you had your accident,
14 have you traveled -- have you gone on any
15 long-distance car trips?

16 A Not really, no.

17 Q What is the farthest you've gone?

18 A Maybe about a 50-minute ride.

19 Q Did you say 15 or 50?

20 A 50. 50 minutes.

21 Q And how --

22 MR. SCHMIDT: I'm sorry. I didn't hear
23 was that. Was that 50 or 15?

24 THE WITNESS: 50.

25 MR. SCHMIDT: 50? 50 minutes?

1 THE WITNESS: 50, yeah.

2 BY MR. GEFFEN:

3 Q Okay. And did you -- how was it for
4 you to ride in the car for that amount of time?

5 A Well, by the time I got there, I was
6 ready to get out. Even before we got there, it
7 was -- it's so long in a car, and I have problems.

8 Q And what sort of problems, if I could
9 ask?

10 A Well, with my leg being broke, I have
11 problems like -- the leg is healed; but just from
12 being -- keeping my legs in one -- in one position,
13 not walking, they get stiff and it bothers me.

14 Q Now, have you ever seen any
15 advertisements about the voter ID law in
16 Pennsylvania?

17 A Not recently, no.

18 Q Did you see any at any time?

19 A When they first came out that they were
20 going to do it, you saw it. It was on TV and in
21 the newspaper and everything.

22 Q Okay. Have you seen any advertisements
23 since the November 2012 election?

24 A No. That's why I didn't know you could
25 use it in May because I never saw anything.

1 Q How do you get most of your news?

2 A TV, news station I watch, the news
3 channels on TV.

4 Q Are there specific channels that you
5 watch?

6 A Fox News.

7 Q Do you subscribe to a newspaper?

8 A No.

9 Q Do you currently have Internet access
10 from your home?

11 A No.

12 Q Is voting important to you?

13 A Yes.

14 Q Why is that?

15 A Because I feel that if you want a say
16 in your government, you should be voting. You
17 should let them know what you want and how you feel
18 about things.

1 Q My name is Kevin Schmidt. I represent
2 the Respondents in this action. I just have a few
3 follow-up questions for you.

4 You said that you've lived at this
5 address, 1200 Mulberry Street in Reading, for about
6 13 years now?

7 A Yes.

8 Q Do you have any plans on moving anytime
9 soon?

10 A No.

11 Q No? Okay.

12 A My next move is probably to the
13 graveyard.

14 Q I hope not, but --

15 And you said your polling place is
16 about three blocks away; is that correct?

17 A Yes.

18 Q And do you walk there, ma'am?

19 A I did before I had my accident. I
20 always walked there.

21 Q And what year did you have your
22 accident?

23 A 2008.

24 Q 2008? Okay.

25 And after your accident, when did your

1 doctor or any physician tell you that you were
2 fully recovered from your accident?

3 A I don't think anybody ever said I was
4 fully recovered, but they cleared me in -- I guess
5 it was early part of 2010 or the 2009, somewhere
6 around there.

7 Q Okay. So you testified that after your
8 accident, after your broken leg, your
9 daughter-in-law or your son-in-law or I guess in a
10 real emergency your brother could take you to your
11 polling place to vote; is that correct?

12 A Yes.

13 Q And would they offer that same
14 accommodation if you needed to go somewhere else in
15 an emergency?

16 A Yes.

17 Q So they're available to you to get you
18 around town or anywhere you need to go; is that
19 correct?

20 A Yes; at their convenience, yeah.

21 Q Now, you said you at one point voted
22 absentee ballot?

23 A Yes.

24 Q Could you describe the circumstances
25 around that. Why did you vote absentee?

1 A I was in the hospital, in the Reading
2 Hospital. And they had transferred me from Hershey
3 back to the Reading Hospital, and I wasn't going to
4 be out in time. And I didn't want to miss voting,
5 so my husband got me an absentee ballot.

6 Q And that was as a result of your
7 accident in Hershey?

8 A Yes.

9 Q As a result of that accident, did you
10 file a lawsuit against anyone?

11 A No. My husband inquired about whether
12 or not we could get my medical bills paid. And the
13 Giant Center in Hershey said, no, they won't do
14 anything like that. So then we just left it go.
15 We tried for medical expenses.

16 Q How did you get involved as a witness
17 in this lawsuit, ma'am?

18 A I got a phone call from somebody that
19 asked me if I would talk to a lawyer and cooperate
20 in -- because of the ID for voting, whether or not
21 I was voting and whether I had an ID or not.

22 And then I told them that I had -- I
23 did, but I had a hard time getting it renewed. And
24 then they asked me if I would talk to a lawyer
25 about it.

1 Q Who called you?

2 A She might have told me her name, but I
3 don't remember. It was a woman.

4 Q How did she get your name?

5 A I don't know. That's what I was
6 wondering. I don't know how she found out.

7 Q Did she ever -- this woman ever
8 describe to you how she got in contact with you or
9 got your information?

10 A No. She just asked me my
11 circumstances. And then she said that if I
12 would -- if I wanted to cooperate, there would be a
13 lawyer contacting me.

14 Q And when did this occur?

15 A It was the past -- I'd say in the past
16 month or two months.

17 Q Why did she say she was calling you?

18 A She just asked me if I was a voter and
19 whether or not I used the Pennsylvania ID to vote
20 and whether or not I had one and how I felt about
21 it.

22 Q And she didn't identify a specific
23 group that she was with?

24 A No.

25 Q And you can't remember her name?

1 A No, I don't.

2 Q What lawyer did she direct you to?

3 A What's your name? Ben.

4 Q Mr. Geffen, who is sitting --

5 A Yes.

6 Q -- to your left?

7 A That's who contacted me. She didn't
8 tell me who she -- she just said, "A lawyer will be
9 contacting you." And he's who contacted me.

10 Q Okay. And what did they describe they
11 needed you for?

12 A They just wanted to know how I felt
13 about having to vote with an ID and how I felt when
14 I told them that I didn't have one; I had to get it
15 renewed. They wanted to know how I felt about
16 that, that I couldn't vote because I didn't have an
17 ID.

18 Q Just moving forward to some more of
19 your testimony, ma'am, you said that your farthest
20 recent travel was about 50 minutes in a car?

21 A Yes.

22 Q Where did you go?

23 A To Lansdale.

24 Q Lansdale?

25 A To --

1 Q That's my neck of the woods.

2 A Is it?

3 Q Yes.

4 A To my friend's house --

5 Q Okay.

6 A -- in Lansdale.

7 Q And you went there by car?

8 A Yes.

9 Q Who took you there?

10 A My daughter and her husband.

11 Q And do they take you to get your
12 groceries?

13 A Yes.

14 Q How often do they drive you around
15 during the course of an ordinary week?

16 A To doctor's appointments if I have a
17 doctor's appointment, and I usually try to do my
18 grocery shopping once a month when I get my check
19 so that I have stuff, that they don't -- I don't
20 have to be bothering them to take me around.

21 And sometimes my prescriptions, they
22 take me to pick them up or they'll pick them up for
23 me.

24 Q When you say your check, what do you --

25 A My Social Security check.

1 Q Okay. Ma'am, what -- you talked a
2 little bit about having a PennDOT driver's license,
3 photographic identification card; is that correct?

4 A Yes. It's an ID card.

5 Q And that expired, ma'am?

6 A Yes. My driver's license expired
7 back -- right after I had my accident and the
8 doctor said I couldn't drive, so I never bothered
9 to have it renewed.

10 Q Okay. At any time did the doctors
11 clear you to drive?

12 A No.

13 Q Okay, has anybody told you currently
14 that you still cannot drive?

15 A Not -- not in so many words, but I know
16 by myself I wouldn't -- would never put anybody at
17 risk of driving, because my reflexes -- and the
18 doctor will say my reflexes aren't very good right
19 now.

20 Q And I guess that's your opinion as to
21 whether or not you feel you can drive. But no
22 doctor has explicitly said to you, "Ma'am, you
23 cannot drive"; correct?

24 A They did at one time, but not lately.

25 Q Right. Okay. Postaccident and post --

1 clearing your medical condition, no one has
2 explicitly told you not to drive; is that correct?

3 A No, no one has really -- I just don't
4 do it, because I know I'm not up -- I'd be afraid
5 I'd have an accident.

6 Q Understood. Understood.

7 Getting back to your PennDOT ID, now do
8 you have another PennDOT photographic
9 identification card?

10 A The one that they gave me that was
11 issued to me, Pennsylvania's nondrivers.

12 Q And does it have your photo on it?

13 A Yes.

14 Q And is it current?

15 A No.

16 Q When did that expire?

17 A That expired 2011.

18 Q And what efforts have you made to renew
19 that?

20 A I called them at their office to see
21 what kind of -- if they had any way that I could
22 get in there without standing in line for four
23 hours to come and renew it.

24 And they said, no; that if I came, I'd
25 have to stand in line, just like everybody else

1 did.

2 I told them I could not stand for four
3 hours.

4 And they said that's the chance I got
5 to take.

6 Q When did you call?

7 A Right after November 2012, election,
8 when they told me I had to get it renewed.

9 Q And is that the only effort you've made
10 to try and renew that?

11 A Yes.

12 Q You've never asked them if you could
13 renew it by mail?

14 A No, I can't. I asked that.

15 Q Okay. And what were you told?

16 A I told them -- I was told I had to come
17 in person. You have to come in person to do it.
18 Nobody else can do it for you. You have to come in
19 person.

20 Q And who told you that, ma'am?

21 A Somebody from PennDOT, whoever I was
22 talking to.

23 Q And is that the PennDOT driver's
24 licensing center in Shillington?

25 A Yes.

1 Q Okay. And do you remember when you
2 were told that, what date it was?

3 A It was back in 2012, after the
4 election. Might have been towards the end of the
5 year, when I called them.

6 Q Since that time, have you ever gone to
7 PennDOT in Shillington?

8 A No.

9 Q Okay. Did you ever call back again to
10 ask maybe another representative of PennDOT if you
11 could have accommodations made for your condition?

12 A No, no.

13 Q Are you willing to do that, ma'am?

14 A Yes.

15 Q So you've just chosen not to do it up
16 to this point; is that correct?

17 A Right. Because I have a problem -- my
18 son-in-law or my daughter can just take me when
19 they aren't working, and it's not always
20 convenient. So I got to do it when I know they can
21 take me.

22 Q Have you ever called to ask them if
23 there was a line before you had an opportunity to
24 go to see if you didn't -- you wouldn't have to
25 wait that long?

1 A No. There's never -- you go there,
2 there's not a line. At least I haven't seen it.

3 Q But that's just based on your
4 experiences being there; correct, ma'am?

5 A Right, right, yes.

6 Q And ma'am, you testified that this
7 expired nondriver's license issued by PennDOT,
8 that's the only photographic identification card
9 you have?

10 A Yes.

11 Q How long does it take you to get to the
12 Shillington driver's license center?

13 A About 15 minutes.

14 Q 15 minutes? By car?

15 A Yes.

16 Q And you don't have any problem getting
17 there by car --

18 A No.

19 Q -- assuming your daughter or son-in-law
20 will take you there?

21 A Yes.

22 Q When you were at PennDOT, ma'am --
23 strike that.

24 Did you ever, in your conversations
25 with representatives at PennDOT, ask for any way to

1 mail in information to obtain a photographic
2 identification card?

3 A Yes. And they told me no, you have to
4 come in person.

15 You testified that you did not vote in
16 the May 2013 election; is that correct?

17 A That's right.

18 Q And you testified that you didn't
19 believe you could, based on what somebody advised
20 you at your polling place at the time you voted for
21 the November 2012 general election; is that
22 correct?

23 A Yes.

24 Q And who at that polling place told you
25 you would not be able to vote in your -- in the

1 May 2013 election without photographic
2 identification?

3 A The poll -- the person that worked in
4 the polling place, that signed me in.

5 Q Do you know his or her name?

6 A No, I don't. Every time you go there,
7 there's a different one there. And they -- when
8 they sign you in, they ask for your ID. And when
9 you don't have it, then they told me that --

10 Q Did you find that peculiar that they
11 told you that?

12 A No, because I knew before I went there
13 that the law was going to be taking effect.

14 Q Okay.

15 A So I -- it didn't surprise me. I
16 didn't think it was right; because I said to them,
17 "I've voted all these years without one. Why all
18 of a sudden?"

19 They just said, "That's the law."

20 Q Did you ask anybody else about that?

21 A No; just there at the polling place.

22 Q You just relied solely on that person
23 at the polling place?

24 A Yes.

25 Q How about your daughter or son-in-law;

1 did they vote in May 2013?

2 A I don't really know. I didn't ask
3 them.

4 Q Did they vote in November 2012?

5 A I think they did. I'm not sure.

6 Q Okay. As a former committeeperson, do
7 you still have contacts in the political
8 communities?

9 A Not really. All the ones that was in
10 office and worked in the headquarters are all new.
11 And I don't -- since this I haven't done any work,
12 so I don't really know.

13 Q But you never called anybody at any
14 headquarters to find out whether or not what you
15 were told at the November 2012 election was
16 accurate regarding voting in May of 2013?

17 A No.

25 Q Ma'am, you said you do not have

1 Internet access; is that correct?

2 A No. I have a computer, but I need a
3 new drive.

4 Q So you do have Internet access, then?

5 A Once the drive gets finished, yes.

6 Q And is somebody currently working on
7 that?

8 A Not yet, but I'm --

9 Q You plan on having it fixed?

10 A Yes.

11 Q Do you belong to your local public
12 library?

13 A No.

14 Q We went over some of the identification
15 cards you may or may not have. I just want to go
16 down a list to make sure that we're specific.

17 Do you have a passport, ma'am?

18 A No.

19 Q Do you have any military
20 identification?

21 A No.

22 Q Did you have any identification from
23 your time as an employee at Giant?

24 A No.

25 Q Have you ever tried to get the

1 Department of State ID for voting purposes, ma'am?

2 A No. I didn't know there was anything
3 like that.

7 BY MR. GEFFEN:

8 Q I have just a very small number of
9 follow-up questions to some of the questions
10 Mr. Schmidt just asked.

11 He asked you about the line at the
12 Shillington PennDOT location.

13 How often have you seen a line at that
14 location, if you can recall?

15 A Every time I go by there.

16 Q Do you remember about how many times
17 that would have been?

18 A Well, at the time -- before I got laid
19 up, I used to go there, by there at least once a
20 week.

21 Q And you mentioned that you were -- that
22 you voted absentee in the time when you were
23 hospitalized?

24 A Yes.

25 Q Why didn't you want to miss voting when

1 you were in the hospital?

2 A Because I thought it was important to
3 vote, and we were voting for president that year.
4 And I didn't want to see -- I wanted my man to get
5 in.

6 Q Who was your man?

7 A McCain.

13 Q Ma'am, if I provided you documents
14 today that you could mail in to PennDOT that would
15 expedite your time at the driver's licensing center
16 to get your photographic identification card, would
17 you fill those out and send those in?

18 A Yes.

9 Q Your answer was "yes," ma'am?

10 A Yes.

11 MR. SCHMIDT: Okay. That's all I have.

1 CERTIFICATE OF SHORTHAND REPORTER

2

3 I, Gail Inghram Verbano, Registered
4 Diplomat Reporter, Certified Realtime Reporter,
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CA-CSR No. 8635

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