

1 IN THE COMMONWEALTH COURT OF PENNSYLVANIA

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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 MINA KANTER-PRIPSTEIN

19 taken at [REDACTED]

20 Philadelphia, Pennsylvania

21 Friday, June 28, 2013

22 11:45 a.m.

23

24 Gail L. Inghram Verbano, CSR, RDR, CRR

25

8 MINA KANTER-PRIPSTEIN, having first
9 been duly sworn according to law, was examined and
10 testified as follows:

11 DIRECT EXAMINATION

12 BY MR. GEFFEN:

13 Q Good day, Mrs. Pripstein. How are you?

14 A Okay. Thank you.

15 Q Thank you. Would you please state and
16 spell your name for the court reporter.

17 A M-I-N-A, K-A-N-T-E-R, dash,
18 P-R-I-P-S-T-E-I-N.

19 Q And is it okay if I address you as
20 "Mrs. Pripstein"?

21 A Yes.

22 Q Okay. And where do you live,
23 Mrs. Pripstein?

24 A [REDACTED]

25 [REDACTED].

1 Q Okay. And that's in Philadelphia?

2 A In Philadelphia.

3 Q And we're in your apartment right now?

4 A Right.

5 Q Okay. And how long have you lived in
6 this apartment?

7 A 25 years approximately.

8 Q And where did you grow up?

9 A Philadelphia.

10 Q And have -- well, since you were a
11 child, have you ever lived anywhere but
12 Pennsylvania?

13 A No.

14 Q And are you currently married?

15 A Widowed.

16 Q And how long ago did your husband pass
17 away?

18 A 12 years.

19 Q And do you have any children?

20 A I have two children.

21 Q Where do they live?

22 A My daughter lives in Spring Valley,
23 New York, which is about 45 minutes outside of
24 New York City. My son lives in Marietta,
25 Pennsylvania, which is near Lancaster.

1 Q About how long a drive is Marietta from
2 here?

3 A Approximately two hours, I'm told.

4 Q And do you have any grandchildren?

5 A Three.

6 Q Do any of them live in the Philadelphia
7 area?

8 A No.

9 Q Now, I noticed when you were walking
10 over to the table here, it looks like you were
11 walking a little slowly. Do you have trouble
12 walking?

13 A I do.

14 Q And why is that?

15 A Well, about four years ago or five
16 years ago, I broke my leg. And I was told at that
17 time by the doctor that he didn't want to operate
18 because it was a clean break; he would cast it, but
19 that I would eventually have some trouble with my
20 knees. And I could come back at that time. I'm
21 having trouble now.

22 Q Okay. And do you ever -- have you ever
23 used used a wheelchair?

24 A Yes. At that time I did.

25 Q And when you say "at that time" --

1 A When I broke my leg.

2 Q Okay. Do you currently use a
3 wheelchair?

4 A I beg your pardon?

5 Q Do you currently use a wheelchair?

6 A No.

7 Q Do you use a walker or a cane?

8 A I've tried using a cane. I'm terribly
9 awkward.

10 Q Do you drive a car?

11 A I'm thinking of get a walker.

12 No. I gave up about a year ago.

13 Q And why did you give up driving?

14 A I found the cars were going past me,
15 and I thought I was going at a nice clip. And I
16 just thought it was probably a good time. When you
17 get to be 90 and you've had a good driving record,
18 why take chances?

19 Q And I'm sorry to pry, but would you
20 mind telling me how old you are now?

21 A I'm 92.

22 Q Are you registered to vote,
23 Mrs. Pripstein?

24 A Yes.

25 Q How often do you vote?

1 A Every chance I get.

2 Q And do you remember the first time you
3 voted?

4 A Yes. I voted for Roosevelt.

5 Q And when you vote, do you typically
6 vote in person or by absentee ballot?

7 A In person.

8 Q And where is your polling place?

9 A In this building, on the second floor.

10 Q And how long have you been voting at
11 that polling place?

12 A Well, I've lived here 25 years. So all
13 the time that I'm here.

14 Q Okay. And how do you get there from
15 your apartment?

16 A It's a cinch. Elevator.

17 Q And is it ever difficult for you to get
18 there?

19 A No.

20 Q And what kind of a wait do you
21 typically encounter on election day when you go to
22 vote?

23 A A wait? Oh, it's not too bad. You go
24 at the right time. I try to go after lunch, not
25 too early in the morning, not too late in the

1 evening. Sometime in the early afternoon. And
2 maybe I'll be fourth or fifth in line.

3 Q In recent years have you ever voted by
4 absentee ballot?

5 A No.

6 Q To get an absentee ballot, you would
7 have to sign a legal declaration stating that you
8 are unable to attend your polling place because of
9 illness or physical disability.

10 If there were an election today, could
11 you sign a declaration stating that?

12 A Today? No.

13 Q And if you were told that you could no
14 longer vote in person but that you'd have to mail
15 in your ballot, how would you feel about that?

16 A Uncomfortable.

17 Q And why is that?

18 A I like the feeling of going to a
19 polling place. I don't know why I feel that way,
20 but I do.

21 Q Did you vote in the November 2012,
22 election?

23 A Yes.

24 Q And at that election --

25 A Was that the primary you're --

1 Q I'm sorry. I'm asking about the
2 general election last year, the presidential
3 election.

4 A Oh, yes. Okay.

5 Q And at that election did anyone say
6 anything to you at the polling place about showing
7 a photo ID?

8 A We joked about it, but nobody said
9 anything serious about it.

2 Q At the November 2012 election, did
3 anyone at the polling place say anything to you
4 about needing to show IDs in future elections?

5 A No.

6 Q Did you know the people who were
7 working at the polls at that election?

8 A Most of them.

9 Q Did you vote in the May 2013 primaries?

10 A May 13?

11 Q I'm sorry. May of 2013 --

12 A Oh.

13 Q -- in those primaries?

14 A Yes.

15 Q And at that election did anyone at the
16 polling place say anything to you about showing
17 photo ID?

18 A No.

19 Q Did anyone at the polling place give
20 you a pamphlet or other written information about a
21 photo ID law?

22 A No.

23 Q Have you ever served as a poll worker?

24 A Yes.

25 Q When did you do that?

1 A I did it this past primary.

2 Q In May of 2013?

3 A Uh-huh.

4 Q Had you ever done it before then?

5 A No.

6 Q And was that at the same polling place
7 where you vote?

8 A Yes.

9 Q What were your responsibilities as a
10 poll worker?

11 A Well, there's a line -- a line of
12 people. We would sit behind a table, and people
13 would pass in front of us. I was last in line.
14 And they gave me a book, and everybody's name had
15 to be written in that book with the number that
16 they were -- No. 1, on up.

17 And the person in front of me would
18 hand me a card with a voter's name written in it,
19 and then I would transfer that to the book
20 permanently and then she could vote.

21 Q Okay. Did you have to show a photo ID
22 to anybody to become a poll worker?

23 A No.

24 Q Would you be interested in continuing
25 to serve as a poll worker in this building?

1 A Sure.

2 Q Now, have you ever had a Pennsylvania
3 driver's license?

4 A Yes.

5 Q Do you have a valid driver's license
6 right now?

7 A It's not valid, but I have it.

8 Q Okay.

9 A It's expired.

10 Q And when did it expire?

11 A It expired one year after my birthday.

12 Q One year after your birth --

13 A I mean -- yeah.

14 Q Was it one year after your birthday or
15 one day after your birthday that it expired?

16 A My birthday, August 31st.

17 Q Uh-huh.

18 A And I think it expired a year after it.
19 Am I wrong?

20 Q Well, I'll ask you the questions.

21 But --

22 A I don't know for sure.

23 Q Do you know the year when your driver's
24 license expired?

25 A I thought it expired in -- we're in

1 '13 -- '12.

2 Q I'm sorry. You're saying your driver's
3 license expired in 2012?

4 A Yeah.

5 Q And what's your birthday?

6 A August 31st.

7 Q And so do you know the date when your
8 driver's license expired?

9 A I really don't.

10 Q Okay.

11 A I didn't bother.

12 Q Okay. Would it refresh your
13 recollection if I told you the date
14 September 1st, 2012?

15 A That would be the day after my
16 birthday.

17 Q Okay. And is it your understanding
18 that that's the date your license expired?

19 A I guess so. I really didn't think
20 about it too much.

21 Q Okay. Do you have -- but you know for
22 sure that it is expired?

23 A Oh, it has expired by now, yes, because
24 it held up for me to vote.

25 Q Okay.

1 A It was okay then, but it expired soon
2 after that.

3 Q Okay. Now, do you have any
4 understanding about how long after a driver's
5 license expires you're allowed to use it for voting
6 under the new law?

7 A Oh, excuse me. I thought you were
8 talking about expiring to use it for voting.

9 Q Okay. Could you elaborate on what you
10 mean.

11 A I'm not sure -- I can try.

12 Q Okay.

13 A You asked me -- it expired -- not -- I
14 stopped driving. And once I stopped driving, the
15 only thing I ever used my card for was to ID myself
16 at a store.

17 Q Okay.

18 A Occasionally the voting would come up,
19 but not that often.

20 Q Okay.

21 A And I thought about it expiring and --
22 as a voting thing and not as a shopping thing.

23 Q I'm sorry. Okay. So do you know when
24 the license expired for driving purposes?

25 A For what?

1 Q For driving purposes, when the license
2 expired.

3 A I did think that it was nine months
4 after, or a year. But I didn't worry about the
5 difference.

6 Q Okay. Do you have a current U.S.
7 passport?

8 A No.

9 Q Do you have any other ID other than
10 your expired driver's license with your picture on
11 it?

12 A No.

13 Q Have you sought to renew your license
14 since it expired?

15 A I thought about renewing it to use as
16 an ID. I haven't been able to get anywhere.

17 Q Okay. When you first got that driver's
18 license, the one that's now expired, do you
19 remember where you went to get it?

20 A No. I don't even remember where I
21 lived at that point.

22 Q Okay. I don't mean your very first
23 driver's license. I mean the one that recently --
24 the one that recently expired.

25 A I did it by -- I had to get a picture.

1 Q Right.

2 A I went to Market Street.

3 Q Okay. And do you remember how you got
4 to Market Street?

5 A I took a bus here, and I walked from
6 Wanamaker's to the PennDOT place.

7 Q Okay. And is there a bus that travels
8 between this building and downtown Philadelphia?

9 A We have a private bus.

10 Q When you say "we have," are you
11 referring to the condo association?

12 A Am I what?

13 Q When you say "we have a private bus,"
14 who do you mean?

15 A I mean the apartment house.

16 Q Okay. And do you ever ride that bus
17 now?

18 A Very rarely.

19 Q When was the last time you rode that
20 bus?

21 A I just recalled. I had a friend who
22 died a month ago. And I rode over in the bus with
23 three friends. We helped each other. The reason I
24 don't ride it is because I'm afraid to step down.
25 I'm afraid my leg will collapse. It hurts when I

1 step down. And it feels weak.

2 But I went with the other people, and I
3 was helped. I had to get to the Kennedy House.
4 And the bus stopped for us right in front.

5 Q Have you --

6 A Coming back I took a -- a taxi cab.

7 Q Okay. Have you ridden that bus -- do
8 you remember any other times you've ridden that bus
9 recently?

10 A I had a doctor's appointment. I was
11 afraid to take it. I took a cab. No. That was
12 the last time.

13 Q Do you ever ride a SEPTA bus or subway
14 train?

15 A I can't get to them. No.

16 Q Do you ever use paratransit?

17 A No.

18 Q When you see a doctor, how do you get
19 to a doctor's appointment?

20 A With difficulty. I usually call a cab.

21 Q Do you remember the last time you took
22 a cab to a doctor's appointment?

23 A Clearly.

24 Q And when was that?

25 A Oh, it was about a month ago.

1 Q Okay.

2 A I went to the eye doctor. And he gave
3 me a new prescription.

4 Q Do you -- sorry.

5 A I went out to get a cab to come home,
6 and a young girl opened the door for me. She was
7 there to open and close the doors. And I said to
8 her, I guess I have to walk up to Walnut Street.

9 She said, You're not walking anywhere.
10 And she said, You just stay right here. I'll go
11 get it for you.

12 I said, can you leave your job?

13 Don't worry.

14 She was very lovely. She did bring me
15 back a cab.

16 Q Do you remember how much it cost to
17 take that taxi?

18 A Yes. It cost me \$15 each way.

19 Q And have you gotten that new
20 prescription filled?

21 A No.

22 Q Why not?

23 A I have no way of getting over to get it
24 done. I thought my son was going to come in, and
25 he does come every two weeks. And I figured he

1 could take me.

2 But we ran into another problem. Where
3 would he park? And no one to come back and get
4 me -- it got awfully complicated. There's no place
5 to park in town; and if he took me in the bus,
6 which he could, to help me, I have to walk two
7 blocks. I'm not sure I could do that -- two and a
8 half blocks.

9 So I've just kind of sat with the
10 prescription. I haven't gotten it done yet.

11 My world is getting a little smaller.

12 Q How far do you typically -- well, let
13 me ask you this way: Do you ever get rides places
14 in a car from one of your family members or
15 friends?

16 A Friends -- I have one friend that
17 drives.

18 Q And how far do you typically travel by
19 car when you go places?

20 A I guess as far as the suburbs.

21 Q Would you be able to ride in a car to
22 Harrisburg and back?

23 A No.

24 Q And if you could do your best to tell
25 me, about how many times in the last six months

1 have you gone somewhere other than a doctor's
2 appointment by vehicle?

3 A Other than the funeral, I don't think I
4 have.

5 Q Now, if you had to go to the PennDOT
6 driver's license center at 8th and Arch to get
7 photographed for a new ID card, how would you feel
8 about doing that?

9 A I don't know if I'd be able to do it.

10 Q And why not?

11 A Well, the bus won't take me there.
12 Just drop me off at Wanamaker's -- if I could get
13 in the bus. Say people were going that knew me and
14 could help me in and out, but then how would I
15 get -- how would I walk that far? That's far for
16 me. I don't even walk around the store anymore.
17 No, I couldn't do it. I'd have --
18 maybe take a cab. But then I'd have to come out
19 and try to find one to get back.

20 I don't think I'd bother.

21 Q Well, what if you had to choose between
22 getting your picture taken at 8th and Arch and
23 not voting in the next election; what would you
24 choose?

9 A I think I wouldn't bother.

10 Q You wouldn't bother -- what?

11 A Going.

12 Q Going to PennDOT or going --

13 A Get my picture taken. I just wouldn't
14 vote.

15 Q Okay. Now, can I also ask you where --
16 where do you get groceries?

17 A Downstairs. We have a supermarket.

18 Q And what about other shopping? How do
19 you do other shopping?

20 A Catalogs.

21 Q Now, have you heard anything about ID
22 cards for people who are ineligible for regular
23 PennDOT ID cards?

24 A No.

25 Q Have you ever heard of something called

1 the Department of State ID card?

2 A No.

3 Q And have you heard anything about some
4 way to renew your PennDOT ID without getting your
5 picture retaken?

6 A No. I -- I can't imagine that.

7 Q Is voting important to you,
8 Ms. Pripstein?

9 A Voting is very important to me.

10 Q Why is that?

11 A That's -- that's what the country is
12 based on, being able to vote. It's a privilege.
13 And I'm willing to give up some privileges because
14 I'm getting old, but I don't want to give that up
15 yet.

20 Q It's a little bit after noon, so good
21 afternoon, Mrs. Pripstein.

22 A Good afternoon.

23 Q Again, my name is Kevin Schmidt. I
24 just have a few follow-up questions.

25 Ma'am, you just testified that voting

1 is important to you. Would it be important enough,
2 if you needed to go to PennDOT, to ask your friend
3 who gives you rides to the suburbs to take you
4 there?

5 A We only went to the suburbs once
6 because we were going out to dinner, four ladies,
7 and she was driving.

8 No. I find it difficult to ask for
9 favors, very difficult.

10 Q If you asked her, do you think she
11 would take you there?

12 A In a minute.

13 Q You said that despite voting being very
14 important to you, you wouldn't vote in the next
15 election if you had to go to PennDOT to get a new
16 photo?

17 A I'd like you to come back and ask me
18 that when you're 93.

19 Q But you agree with me that's what you
20 testified to; correct, ma'am?

21 A I did testify to that. But I can't
22 tell you what happens to you -- things do get less
23 important. Things that you thought you'd -- you
24 never would be able to do without get a little bit
25 less important to you.

1 Q So are you saying that voting is a
2 little less important to you now?

3 A I suppose it's less important than when
4 I was 50, 60, 40 and when I was 20.

5 Q Right.

6 A But it is -- it is a part of my life,
7 and it's one of the few things I thought I'd always
8 do.

9 Q And you testified earlier that you
10 haven't made any efforts to renew your driver's
11 license.

12 Have you tried to surrender it?

13 A No. I -- I thought I -- you know,
14 nobody really looks at the age. They say, "I want
15 to see some ID, who you are." And you show it to
16 them. I wouldn't do it against the law -- I don't
17 think. But -- no.

18 Q Nah, nobody expects you --

19 A Nobody. But I was -- I kept it -- why,
20 I can't tell you, but I did.

21 Q But have you tried to renew your
22 driver's license, ma'am?

23 A I don't want to drive anymore.

24 Q Okay. Have you tried to surrender it
25 so that you could get a photo ID that's not for

1 driving purposes but would still serve for your
2 shopping, for example?

3 A I don't understand -- oh, well, I use
4 my Visa card for that.

5 Q Okay. Let me --

6 A I can't think of any reason --

7 Q Are you aware that PennDOT offers a
8 photo ID for nondrivers, so that you can use it to
9 identify yourself?

10 A Yes, yes.

11 Q Would you be interested or have you
12 made any efforts to try and get one of those IDs,
13 ma'am?

14 A I'd be interested, but I haven't made
15 an effort.

16 Q And would you be interested in
17 contacting PennDOT to see if you could do that by
18 mail?

19 A By mail? A picture? No. I didn't
20 think that was possible.

21 Q Have you ever called PennDOT to ask?

22 A No. I wouldn't know how to do it. I
23 mean, but not by mail. How would you take a
24 picture by mail?

25 Q Let me ask you this, ma'am: If you

1 could do it, would you be willing to find out how
2 to do it from PennDOT?

3 A Yeah. I don't have anything against
4 PennDOT.

5 Q Do you have any problem calling them?
6 Are you able to call?

7 A Am I able to call?

8 Q Yes. Do you have a telephone?

9 A I have a telephone.

10 Q And would you have any problem reaching
11 out to them to get information about trying to
12 renew your license?

13 A Sometimes hearing problem, but that's
14 it.

15 Q Okay. But that's it?

16 A That's it.

17 Q Okay. Now, you testified, ma'am, that
18 your apartment complex has its own transportation?

19 A I don't know if it's six days a week or
20 five days a week -- six, I guess. I know that they
21 don't go on Sunday. They make a turn.

22 Q And it's a bus?

23 A A bus.

24 Q And --

25 A And I was all right with it after -- I

1 thought I was after I gave up my car. But when the
2 leg started up, I was afraid to put my leg down.
3 If felt like it was going to collapse.

4 Q Okay. Does the driver help you in and
5 out of the bus?

6 A They're not supposed to. I don't
7 honestly know. They're not supposed -- they're not
8 supposed to. They are not supposed to.

9 And yet, I heard of one that almost got
10 fired because he helped a lady get out; she
11 couldn't get out. She had the same trouble.
12 Somebody on the bus reported her -- reported him.
13 I can't understand it. So I don't know. I
14 can't -- I guess I just can't answer that.

15 Q In your past experiences, has any
16 driver helped you on or off the bus?

17 A No.

18 Q Okay. And does that bus -- will that
19 take you to a specific destination, meaning if you
20 give them the address, they'll take you there?

21 A No.

22 Q Where will the bus take you?

23 A It goes down Market Street, around City
24 Hall. It stops at what used to be Wanamaker's --
25 whatever it is now -- and comes back up JFK. It

1 makes stops on the corner at JFK, on the cross
2 streets. And then it somehow goes past the museum
3 to get home.

4 Q Now, ma'am, you talked about --

5 A Takes a half hour.

6 Q Half an hour?

7 You talked about using an ID to go
8 shopping earlier. Is that a photographic
9 identification card that you use?

10 A No. I think I was thinking of a Visa.

11 Q Okay. So when you purchase things, you
12 use your Visa card?

13 A (Nods head.)

14 Q Okay. And do you shop anywhere else
15 other than the grocery store in your apartment
16 complex here?

17 A I was just thinking about my credit --
18 go ask them. I guess -- where else do I shop? I
19 don't go to Macy's anymore. I get a lift when my
20 son comes in. He takes me to Trader Joe's.

21 No. I've got the restaurant
22 downstairs, the bank -- I've got every --
23 everything is right here.

24 Q How often does your son come in to take
25 to you Trader Joe's or anyplace else?

1 A Well, we thought we were going to do it
2 every other week. It did work out -- almost that
3 way. Sometimes he can't make a week. And he comes
4 and stays overnight.

5 Q How old is your son?

6 A 63.

7 Q So is it fair to say he comes every
8 other week to see you?

9 A I guess it's fair.

10 Q Okay. Ma'am, what's the furthest
11 you've traveled in the last year?

12 A I didn't even get to Florida. I
13 went -- oh, I went -- my son picked me up. I went
14 to Bard College to see my grandson married. I
15 said, "I can't do it. I can't do it. I just can't
16 do it." And I did it.

17 Q Where is Bard College, ma'am?

18 A New York State.

19 Q Okay. And how long of a ride was that?

20 A Endless. I honestly don't know. I
21 think around five hours.

22 Q And did you do that drive all in one
23 trip?

24 A Did you ever go with my son?

25 Q I can't say that I have.

1 A We sure went all one way -- all one.

2 Q It sounds like he doesn't like to stop
3 when you're traveling?

4 A Well, no, he doesn't.

5 Q And do you remember, ma'am, when you
6 took that trip?

7 A Oh, they were married in the
8 summertime. They both graduated Bard, and -- let's
9 see. And he had to go to Dartmouth in September --
10 I'm talking out loud. I shouldn't do that.

11 When? When I went.

12 Q Was it this past summer, 2012?

13 A No, no. It was the summer before.

14 Q So 2011, then?

15 A Yeah.

16 Q Okay.

17 A Was it this summer -- no, because he's
18 been at Dartmouth one year. He's finishing up his
19 Ph.D., so this is his second year.

20 Q Ma'am, does your apartment complex have
21 a concierge service?

22 A If they do, I didn't use it. They call
23 themselves concierge, but ...

24 Q Do they call -- if you want to go
25 somewhere, will they call a taxicab for you?

1 A Yes; that he does. They call that
2 concierge too now? Yeah. Yeah, I can call down
3 and have that done.

4 Q Okay. What else do they do for you --
5 what else can you ask them to do for you?

6 A They don't pick you up off the floor;
7 I'll tell you that. You've got to call the police.

8 Q Ma'am, is there anyone else local to
9 your apartment complex that could give you a ride
10 somewhere?

11 A I don't know what you mean, local to
12 my --

13 Q Meaning do you have any friends local
14 other than the --

15 A No, I don't.

16 Q Just the one friend and your son?

17 A I've got some friends in the apartment.
18 None of us drive anymore.

19 Q Okay.

20 A Some of us don't walk anymore.

21 Q How do your friends get around in the
22 apartment that don't drive?

23 A About as good as I do.

24 Q Do they get rides as well?

25 A Occasionally. You see, I'm older than

1 most of them, and they go places I don't go
2 anymore. I stopped going to the Walnut Theater. I
3 had 15 years of going, because it's hard to get up
4 and down the aisles.

5 Q Ma'am, do you still send and receive
6 mail?

7 A Do I send -- email?

8 Q Just regular mail, old-fashioned paper
9 mail with stamps.

10 A No. I ask most people to please email
11 me, because my hands are -- arthritic and makes it
12 difficult.

13 But I take your -- I take your -- my
14 own checkbook, and I take care of my daughter's
15 portfolio; and I did my aunt's until she died and I
16 do mine. And I wish somebody would come, God, and
17 take it from me.

18 Q Ma'am, was that a job that you had
19 earlier?

20 A My mother taught me when I was 16. She
21 took me -- I'm not supposed to do too much talking.
22 She took me to Stauffer's where the men, all the
23 men would smoke cigars. It was horrible. And
24 she -- and this tape would go. And she would teach
25 me. It was wonderful.

1 So I've -- I didn't work, no. But I
2 was able to take care of my children for a while.

3 Q So you did it for your family; you
4 never did it professionally, though.

5 A No.

6 Q Ma'am, do you have a computer in your
7 apartment here?

8 A Of course.

9 Q And you're capable of getting on the
10 Internet?

11 A Yes.

12 Q But you got to be careful; right?

13 A The mind works, still. Not as good,
14 but it works.

15 Q And you use email?

16 A Yeah.

17 Q Okay.

18 A Don't most people?

19 Q Ma'am, how did you get involved as a
20 witness in this lawsuit?

21 A God knows. How did I get involved in
22 this? This nice man called me on the phone, and I
23 couldn't say no.

24 Q And that's Attorney Geffen, sitting to
25 your left?

1 A Yes.

2 Q How -- did he ever tell you how he got
3 your name or your telephone number?

4 A Through another agency.

5 Q What was the name of that agency?

6 A I don't know, and I'm ready to kill
7 them.

2 Q So at some point you got a call out of
3 the blue from somebody's office?

4 A Exactly.

5 Q And what did they ask you to do?

6 A I didn't hear them.

7 Q Okay. But at some point they got --

8 A I didn't hear the number.

9 Q Okay.

10 A I'm furious when people do that. They
11 leave their number at the end, and their voice goes
12 down naturally. And I put the damn thing up to my
13 ear, and I can't hear a thing.

5 Q Mrs. Pripstein, thank you so much for
6 accommodating the request for the documents that
7 you referenced.

8 I'm looking at them, and I've shown
9 them to Attorney Geffen. And it looks like it's a
10 Delaware Valley Regional Planning Commission
11 questionnaire, which doesn't relate to this matter.

12 So to clarify -- and that's okay.
13 That's okay. We appreciate --

14 A That's all right. This is how we do
15 business.

16 Q Right. Let me clarify my question,
17 then.

18 When were you contacted by Mr. Geffen?

19 A I don't remember; a couple weeks ago.

20 Q Were you contacted by Mr. Geffen?

21 A Yes.

22 Q Okay. And what was your conversation?
23 What did he ask you to do?

24 A He asked me if I'd be willing to go to
25 Harrisburg, if I could do that.

1 And I said, "No, I couldn't."

2 And then he said -- would I agree to
3 have somebody come over here?

4 Q To do what?

5 A Depose me, I guess, is -- interview me.

6 Q And why did he ask you to go to
7 Harrisburg?

8 A Because you're having a meeting about
9 this. I didn't know anything about this. I was
10 really shocked.

11 Q What's your understanding of what your
12 role is here, ma'am?

13 A Every place I go, my role seems to be
14 age. So I presume that's what it is now, is
15 showing the difficulty.

16 Q Do you realize that you're a witness in
17 a lawsuit about Act 18, which is the voter ID law?

18 A I realize that I'm a witness insofar
19 as -- yes, the ID. But only insofar as
20 Pennsylvania is concerned.

21 Q Correct. When you had your
22 conversations with Mr. Geffen or anybody else at
23 his office, did they explain that to you?

24 A When he -- I'm sorry. Could you repeat
25 that.

1 Q Sure. When you had your conversation
2 with Mr. Geffen, did they explain that you were
3 going to be a witness in this lawsuit?

4 A This is a lawsuit?

5 Q Yes, ma'am.

6 A No. I didn't know it was a lawsuit. I
7 thought it was a protest.

8 Q So this is the first time you're
9 finding out that there's a lawsuit that you're a
10 witness in?

11 A Well, no. I kind of got an idea that
12 when all this came, it would have to be.

13 Q Okay.

14 A It's the most exciting thing that's
15 happened to me in about 40 years.

16 Q Did you meet with anybody from
17 Mr. Geffen's office?

18 A No.

19 Q So you only talked to somebody there
20 one time on the telephone?

21 A It was Mr. Geffen.

22 Q Okay. Is that correct; you only talked
23 to him once on the telephone?

24 A I think you called me twice, once to
25 introduce yourself and say would I do this; and

1 once more to confirm the date.

2 Q Okay. At any time did they offer you
3 any instance to try and get you -- get your
4 driver's license renewed?

5 A No.

13 MR. SCHMIDT: Mrs. Pripstein, those are
14 all the questions I have for you. I really
15 appreciate your cooperation today.

19 Q I have just a few follow-up questions
20 on some of the topics that counsel just asked you
21 about. You were asked -- you testified that you
22 had a friend who gives you rides to places
23 occasionally?

24 A Melanie.

25 Q And you testified that your friend --

1 that you think that if you asked your friend, your
2 friend would be willing to drive you to PennDOT; is
3 that right?

4 A (Nods head.)

5 Q Do you know how you would get in -- get
6 out of the car and into PennDOT if your friend
7 drove you up to that building?

8 A The same way that I always get in and
9 out of a car.

10 Q Is it difficult for you to get in and
11 out of a car?

12 A Yes, it's difficult, but I can't sit in
13 the middle -- I mean, I can't edge my way over. I
14 have to sit near to the door.

15 Q Okay.

16 A But I can -- I do have the ability to
17 get out.

18 Q And you mentioned that your son
19 sometimes drives you to Trader Joe.

20 A Yes.

21 Q Does that grocery store have a parking
22 lot?

23 A Yes.

24 Q And how do you get in and out of the
25 Trader Joe's?

1 A A ramp.

2 Q Do you do that by yourself?

3 A No. He comes with me.

4 Q Okay. Does he ever drop you off
5 somewhere and not get out of the car and help you
6 get into a building?

7 A It has not happened yet.

8 Q Would that be difficult for you to do?

9 A If they have those heavy doors, it's
10 extremely difficult. Otherwise, it's okay.

11 Q Okay. You mentioned attending a
12 wedding at Bard College?

13 A Yeah.

14 Q Congratulations, by the way.

15 A Thank you.

16 Q And that was one or two summers ago, I
17 think you testified?

18 A Yes. Two summers ago, we figured out.

5 Q Now, you were asked a few questions
6 about a concierge service in this building, and you
7 said -- I think I got this down: They don't pick
8 you up off the floor. What were you referring to
9 when you said that?

10 A When I fell.

11 Q And when was that?

12 A When I broke my leg.

13 Q Okay. Have you fallen again since
14 then?

15 A No.

16 Q Good. And have you had any scares?

17 A Have I what?

18 Q Had any scares about falling?

19 A Am I scared? Terrified.

20 Q And why is that?

21 A I'm not as steady as I was. I had
22 fallen two times before that. But each time I was
23 pushed and I didn't break anything. I was lucky
24 because it was outside, and I -- head went down and
25 hit a wall. So it really was a much more dangerous

1 fall than this, and yet this gave me much more
2 trouble.

3 Q And when you say you were pushed, did
4 somebody push you on purpose?

5 A I pushed because -- I was being "lady
6 good" -- whatever, and I took two old ladies --
7 it's funny now -- this was about six or seven years
8 ago -- to the movies.

9 I picked them up because they never get
10 to -- and I took them to the movies. And I brought
11 them back here to have lunch -- dinner. And I
12 said, "Please use the ramp," when we were leaving.

13 And this lady said to me, "No. I'm
14 better off on the stairs. I do much better. I'll
15 be fine."

16 So I walked up the stairs -- I'm the
17 one that usually uses the ramp -- in front of her
18 and she slipped, and she knocked me over. She was
19 fine, but I went rolling right down the hill. And
20 that's when I really got hurt.

21 Q And when you say that you're terrified
22 of falling, is there anything that you do or don't
23 do that you used to do because of that fear?

24 A Everything.

25 Q Can you give me an example.

1 A Yeah. I was completely independent. I
2 had my car then, and I -- and I wouldn't take it
3 during the week. I would go by myself in town and
4 back. After that, it just completely changed my
5 life.

5 Q Just to clarify, is today the first
6 time that you and I have met together in your
7 apartment or have we done that before?

8 A No. You came, I think, three times.

1 CERTIFICATE OF SHORTHAND REPORTER

2

3 I, Gail Inghram Verbano, Registered
4 Diplomat Reporter, Certified Realtime Reporter,
5 Certified Shorthand Reporter (CA) and Notary
6 Public, the officer before whom the foregoing
7 proceedings were taken, do hereby certify that the
8 foregoing transcript is a true and correct record
9 of the proceedings; that said proceedings were
10 taken by me stenographically and thereafter reduced
11 to typewriting under my supervision; and that I am
12 neither counsel for, related to, nor employed by
13 any of the parties to this case and have no
14 interest, financial or otherwise, in its outcome.

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Gail Inghram Verbano, CSR, RDR, CRR
CA-CSR No. 8635

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