

IN THE UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

NORTH CAROLINA STATE CONFERENCE OF)
THE NAACP, et al.,)

Plaintiffs,)

vs.)

Case No.
1:13-CV-658

PATRICK LLOYD McCrory, in his)
official capacity as the Governor)
of North Carolina, et al.,)

Defendants.)

LEAGUE OF WOMEN VOTERS OF NORTH)
CAROLINA, et al.,)

Plaintiffs,)

vs.)

Case No.
1:13-CV-660

THE STATE OF NORTH CAROLINA,)
et al.,)

Defendants.)

UNITED STATES OF AMERICA,)

Plaintiff,)

vs.)

Case No.
1:13-CV-861

THE STATE OF NORTH CAROLINA, et al.,)

Defendants.)

DEPOSITION OF

HILDA ROUSE

1 DEPOSITION OF
2 HILDA ROUSE
3

4 _____
5 5:33 P.M.

6 MONDAY, JUNE 1, 2015
7 _____

8 HAMPTON INN
9 905 N. SPENCE AVENUE
10 GOLDSBORO, NORTH CAROLINA

11 By: Jennifer C. Carroll, RPR, CRR
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A P P E A R A N C E S

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(No exhibits were marked.)

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P R O C E E D I N G S

MS. RIGGS: Good afternoon, Ms. Rouse.

For the record, I'm Allison Riggs. I work at the Southern Coalition for Social Justice in Durham, and I represent the League of Women Voters plaintiffs in this case.

MR. McKNIGHT: And I'm Michael McKnight, and I represent the State Board of Elections defendants in this case. And I'll -- I'll turn it back over to -- to Ms. Riggs to let you ask -- or let her ask you her questions.

HILDA ROUSE,

having been first affirmed by the court reporter and Notary Public to tell the truth, the whole truth, and nothing but the truth, testified as follows:

EXAMINATION

BY MS. RIGGS:

Q. Ms. Rouse, can you state your full name for the record.

A. My full name is Hilda Braswell Rouse.

Q. And Ms. Rouse, when were you born?

A. [REDACTED].

Q. And where do you live?

A. I live [REDACTED]

[REDACTED].

1 Q. Okay. Have you lived in North Carolina your
2 whole life?

3 A. Pretty much.

4 Q. Yeah. You were born here?

5 A. I was born here and I was raised here. I went to
6 school here. I moved away several years after I
7 got out of high school and stayed for a while, a
8 couple of years, and then I came back.

9 Q. Okay.

10 A. And I've been here ever since.

11 Q. Okay. Do you -- are you a registered voter?

12 A. Yes, ma'am.

13 Q. And do you vote regularly?

14 A. Yes, ma'am. Every election.

15 Q. Are you involved in any civic organization groups?

16 A. Yes.

17 Q. Can you list a few of them -- or -- as many as
18 you can remember?

19 A. Well, first, I'm the League of Women Voters
20 president right now in Wayne County. I am a
21 member of the NAACP. A life member. I am a
22 member of the AARP. I try not to deal with the
23 rest of them.

24 Q. I'm sure that keeps you busy.

25 A. Yes.

1 Q. Are you retired, Ms. Rouse?

2 A. Yes, ma'am.

3 Q. Okay.

4 A. I retired in 1999, I think.

5 Q. Excellent.

6 What did you retire from?

7 A. Nursing at Cherry Hospital.

8 Q. Okay. Did -- did you have the opportunity to

9 help a voter who needed to obtain a photo

10 identification card for voting?

11 A. I did.

12 Q. Can you tell me a little bit about that?

13 A. Okay. I was contacted with someone -- by someone

14 from -- the Southern Coalition, I guess.

15 Q. Southern Coalition for Social Justice?

16 A. I think that's who she said she was.

17 Q. Okay.

18 A. And she asked me if I could get somebody to go to

19 Snow Hill to help a -- an 85-year-old woman who

20 was disabled and needed some assistance. And

21 because I was concerned about asking someone to

22 do something like that, I told her I would make

23 sure it got done.

24 I did contact one of my other associates

25 in the league. And -- because they know I don't

1 like to drive out of town. And we agreed to go
2 to Snow Hill. Because I don't know a lot of
3 people in Snow Hill right now. I do know Don
4 Davis. I think he's a senator, Don Davis. I
5 know him well. But I don't know other people in
6 Snow Hill. I used to work with a young lady, but
7 I don't have -- haven't seen her since I was
8 working.

9 But she called the North Carolina
10 Department of Motor Vehicles to try to see if we
11 could get the date and time where they would be
12 in -- that kind of stuff, and she said she got no
13 answer.

14 Q. Can I interrupt to ask: Who is the "she"?

15 A. Oh. The first lady that I rode with down there
16 was a lady named Eldica Cyrus. E-L-D-I-C-A,
17 C-Y-R-U-S.

18 Q. Okay.

19 A. And then she couldn't get anybody. So we went on
20 to Snow Hill anyway. The next week I had told
21 Ms. Hines -- Ms. Hines was the lady's name that I
22 was told to go and try to assist. So I contacted
23 her, and I let her know that I will call her the
24 day before I got ready to come down. And that's
25 what I did.

1 And we agreed to go down on -- in April.

2 It had to be the fourth Tuesday in April when we

3 agreed to go down. Because when we got down

4 there after not being able to talk with them, we

5 realized that they had been down there the week

6 before, which was the third Tuesday. And that's

7 the week we were told that they would always be

8 there, on the third Tuesday in each month. It's

9 a mobile unit. And so we were told that our next

10 date would be May the 19th.

11 We conferred with Ms. Hines and assured

12 her that we would be back on the 19th of May.

13 Well, Ms. Cyrus couldn't go with me because she

14 was going out of town, so I got Ms. Joyce Lexy to

15 drive me down there. And we went down about

16 11 o'clock on the 19th of May expecting DMV

17 mobile unit to be somewhere near the library.

18 And when we got there, we couldn't find it. So

19 finally, we went into the library and went to

20 talking with the librarian. And she informed us

21 that they had contacted her that morning and told

22 her they would not be able to come on the 19th of

23 May.

24 I was disturbed by that. Because prior

25 to that, someone had called me and asked me would

1 I consider going and getting Ms. Hines from Snow
2 Hill, bringing her back to Goldsboro, taking her
3 to DMV, getting her a photo ID, and then take her
4 back. I wasn't willing to do that, so I said so.

5 And then that day when we got down there
6 and we couldn't get her to get her ID because
7 they weren't there, then I was a little bit more
8 disturbed, because she was getting a little bit
9 anxious about getting her photo ID.

10 But the librarian and I, we talked a
11 little bit. And she encouraged us to go to
12 Kinston. So we went to Kinston. Because I knew
13 Kinston was not as far as Goldsboro is from Snow
14 Hill.

15 Q. Can I interrupt just to ask: How far was it from
16 Goldsboro to Snow Hill?

17 A. From shortly, a little ways, just a few steps
18 from where I live on -- off of Berkeley Boulevard
19 to Snow Hill, there is a sign that says 18 miles.

20 Q. Okay. And then how far was it --

21 A. There's a sign -- after you get on -- a little
22 bit on your other side of Snow Hill, there's a
23 sign that says Kinston is -- I think it said 15
24 miles.

25 Q. Okay.

1 A. Of course, Ms. Hines doesn't live far after you
2 get into Snow Hill. And I go by her -- go by the
3 place where DMV was supposed to be at the
4 library. We go about a block, go down another
5 street. Go a couple of blocks, turn off on her
6 street, turn around, get her, come back, go back
7 out to 58, Highway 58, and then we go back to the
8 library. And when we got there, we couldn't find
9 it. But that's kind of the route that we have to
10 do.

11 Q. Okay.

12 A. So then we -- we agreed, she had -- she had no
13 other problems. So we were able to take her to
14 Kinston. We were told -- I thought the librarian
15 said they were at the mall in Kinston. Well, I
16 knew where the mall was. But the mall is more or
17 less on this side of Kinston, and we were on the
18 north side.

19 Well, we went to the mall first. The
20 mall. There was a place in the mall that they
21 were doing DMV work, but they were giving out
22 tags and stuff like that. And it took us getting
23 up to the window before I realized that's what
24 was going on. And the man apologized, told me he
25 couldn't help me. And then he told us we need to

1 come back on, which is really the -- I guess the
2 southwest part of Kinston. We back out on -- we
3 would have to come back out on Vernon Avenue
4 where the DMV is. And we were -- went to the
5 DMV. Went in to make sure that was where we need
6 to go, they was there. Well, we knew it was DMV.

7 And then when we went in, Ms. Hines had
8 her birth certificate, she had her Social
9 Security card, and she had an old photo ID that
10 she had worked using all of her work life.

11 When we got up to the window, he went to
12 trying to processing her. The officer did. His
13 name was Davenport. And he went to try and
14 process her paperwork. And he couldn't do it, he
15 said. Because he said something about Social
16 Security wouldn't let him go but so far with her
17 paperwork and they would cut him off.

18 Well, he did that a couple of times, and
19 then finally he conferred with one of his other
20 officers. And then he asked us if we would be
21 willing to go over to the Social Security office.

22 I said, I don't know where it is. And so he told
23 us how to get there. We then got back in the car
24 with Ms. Hines.

25 Ms. Hines walks with two canes. She

1 said one of her legs was shorter than the other
2 one, so one of her canes vibrates. It's shorter
3 than the other. And each time when we got
4 somewhere, we would have to get her out of the
5 car, she would walk in, and then she was treated.

6 We went back over to the -- well, not
7 back over, but we did go over to the Social
8 Security office. And when we finally got before
9 a -- a person, he told us -- after he asked her
10 questions and she was able to answer everything
11 he asked her, and he said, "There's nothing --
12 we're not stopping this. I don't know what he's
13 talking about."

14 I said, "Well, call him."

15 And so he did. And when he called him,
16 then he said, "But I don't know what you're
17 talking about because we -- we're not, you know,
18 standing in her way, because everything we need
19 here is here."

20 Well, like I told you, she had her
21 Social Security card that had been issued by the
22 Social Security. It amazed me.

23 But anyway, he finally said, "Do me a
24 favor. Just y'all go back out there and sit down
25 for a minute," and he said, "and I'll call you in

1 about ten minutes."

2 Well, it was more than ten, but he did
3 finally call us back, to come back. When he told
4 us to come back, he had Mr. Davenport's name on a
5 piece of paper and told me to go back over to the
6 DMV and he would take care of us.

7 So that's what we did. We went back
8 over to the DMV and, in a few minutes, he did
9 call us up. And he said that somebody had called
10 Raleigh and Raleigh had approved whatever needed
11 to be done. And then he processed Ms. Hines.

12 He told her -- he gave her a number. I
13 didn't get the number, but he did give her a
14 number. He gave her a card and told her if she
15 didn't have her card in 15 days, to call the
16 number and they should be able to tell her
17 something about her card.

18 She took her picture and we left.

19 Q. Okay. Do you -- do you understand what the issue
20 was with the Social Security card the first time?

21 A. I do not. I cannot understand it for the life of
22 me. Because she had three things that should
23 have sufficed. She had her birth certificate.
24 She had a Social Security card. And she had an
25 old photo ID. So I don't understand. But it

1 didn't happen.

2 Q. Do you -- do you know how old Ms. Hines is?

3 A. She's 85.

4 Q. And --

5 A. According to her. And she did know her birth
6 date and her mother's maiden name. She was able
7 to give all of that.

8 Q. Okay. How long did -- so on May 19th, how long
9 did that whole thing take you?

10 A. I left home about ten minutes to 11 o'clock, and
11 it was 4:30 when I walked back in my house door.

12 Q. And did you come home -- straight home from
13 dropping Ms. Hines off?

14 A. After we dropped her off, yes. But we did stop,
15 because we had been with her all day, and I
16 felt -- I guess it was the nurse in me. I felt
17 that she was hungry. Because I knew I was
18 hungry. And the other lady with me was a
19 diabetic and she was hungry. So after we
20 finished doing what we did, we stopped and got
21 her something to eat and got something for
22 ourselves.

23 Q. What was your opinion of the entire process?

24 A. I regretted what she had to go through. Because,
25 as you see, I am 76 years old myself. And if we

1 hadn't had the patience that we had and the time
2 to devote with Ms. Hines and to give her our
3 attention, she would have never got her card.

4 Q. There's just one thing, going back, I want to
5 clarify, too. Ms. Cyrus, the first lady --

6 A. Yeah.

7 Q. -- she -- to your understanding, she called --
8 tried to call DMV to find out when the mobile
9 unit would be there?

10 A. Uh-huh. But she couldn't get an answer.

11 Q. Okay. And then who told you that the DMV mobile
12 unit would be there on May 19th?

13 A. The librarian at Snow Hill.

14 MS. RIGGS: Okay. Ms. Rouse, those are
15 all the questions that I have. Mr. McKnight will
16 ask you a few questions now.

17 THE WITNESS: Okay.

18 EXAMINATION

19 BY MR. MCKNIGHT:

20 Q. Ms. Rouse, thank -- thank you for sharing your
21 experience with us today.

22 A. You're welcome.

23 Q. Just a few questions for you.

24 A. Okay.

25 Q. Was Ms. Hines ever able to get her photo ID, do

1 you know?

2 A. I called her today after I came in from my
3 meeting just before I left the house, and she
4 told me it came in on Thursday.

5 Q. And did she have any concerns about using that ID
6 to vote next time?

7 A. No.

8 Q. And I think you said Ms. Cyrus attempted to call
9 the DMV but didn't get an answer?

10 A. That was in April.

11 Q. Do you know what number Ms. Cyrus tried to call?

12 A. No. I think I can probably find it out, but I
13 don't know. But I know I have a number that he
14 gave me in case Ms. Hines did not get her card.
15 I have that with me somewhere.

16 Q. And that was Officer Davenport you were talking
17 about?

18 A. He gave me this, yes.

19 Q. Okay.

20 A. That's when we were there.

21 Q. But you don't know if that's the number that
22 Ms. Cyrus --

23 A. I -- I do not.

24 Q. Okay. And -- and Ms. Hines -- and I apologize if
25 you've already given this. Did you give

1 Ms. Hines' first name?

2 A. Her name is Minnie.

3 Q. M-I-N-N-I-E?

4 A. Yes. I think it's Minnie Yvonne. But when we
5 signed the card for her picture ID, the officer
6 explained to her -- because she had written
7 almost the distance of the page. And he told her
8 she had -- she couldn't do that. She had to try
9 to write. So she just put Minnie V. Hines.

10 She's single and had never been married.

11 Q. And you said Ms. Hines lives in the town of Snow
12 Hill; is that right?

13 A. Yes, that's correct.

14 Q. Do you happen to know her street address?

15 A. [REDACTED], I think it -- what I got. I
16 mean, 210. I'm sorry. I said 320, but I think
17 it's 210, now that I think about it.

18 Q. That's -- that's okay. I just --

19 A. Okay.

20 Q. -- wanted to ask, just to make sure we were
21 talking about the same person.

22 And you said Ms. Hines had a birth
23 certificate; is that right?

24 A. Yes, she did, with her.

25 Q. And do you know whether that was a certified

1 birth certificate, a --

2 A. Yes, it was.

3 Q. Okay. And the Social Security card, was that a
4 copy or an original?

5 A. When you say "a copy," it was a part of the
6 Social Security card that they sent out. I can't
7 tell you if it was the top part or the extended
8 part. But it was a legitimate copy of Social
9 Security information that they will send you when
10 they send you your card.

11 Q. So it had Ms. Hines' name on it; is that right?

12 A. Yes, it did.

13 Q. Did it have her number?

14 A. Yes, it did.

15 Q. Did it have her signature?

16 A. Now, I can't tell you that I looked well enough
17 to know that it had her signature on it. But I
18 do know she did have her card.

19 Q. And -- and all -- there may be a difference in
20 Social Security cards. I'm -- I'm not sure. But
21 my card, at least, is a -- is a blue card. And
22 it's got my name and it's got my number, and then
23 it's got a space for my signature on it. Is
24 that -- is that what your Social Security card
25 looks like?

1 A. Mine looks that way, but I don't have it with me.

2 I don't walk around with my Social Security card.

3 Q. Okay. And -- and to your recollection, do you

4 remember --

5 A. Hers wasn't -- it was -- you know when you get

6 your Social Security card, at least when I got

7 mine, there was the card, then there was another

8 piece, kind of extension piece, that was attached

9 to the card. And in my mind, it was like that

10 extended piece that was on the card from what I

11 can remember now. But I didn't have any problem

12 that it was legitimate.

13 Q. Okay. But -- so you're thinking the -- the piece

14 of the card that Ms. Hines showed was the

15 extension, not the actual card?

16 A. It was kind of like the duplicate piece.

17 Q. I see.

18 A. I think there is a duplicate piece that comes

19 with it. Is that not right?

20 Q. And you said she also had an old photo ID?

21 A. She definitely had an old photo ID.

22 Q. And what kind of photo ID was that?

23 A. She worked, I think, at the tobacco factory in

24 Kinston. And I think they all had identification

25 information that they used. But she had hers

1 continuously, and I think -- well, I'm sure she's
2 been retired a long time like me. But they told
3 her it was too old to use. And I thought that
4 was interesting.

5 Q. The photo ID?

6 A. The photo ID.

7 Q. And they said it was too old to use for what?

8 A. For her identification, I guess.

9 Q. Well, I mean --

10 A. That's what we're trying to get.

11 Q. Do they mean identification to vote or
12 identification for purposes of obtaining --

13 A. I don't know. I don't know what he meant. But I
14 remember he saying something about "this one is
15 too old." Maybe he was just saying that photo ID
16 was too old.

17 Q. And was Mr. Davenport at DMV generally helpful to
18 you?

19 A. Oh, yes.

20 Q. And except for that one trip to Kinston, you
21 didn't have to go back to Kinston?

22 A. Oh, no. We haven't been back.

23 Q. And -- you were going to add something?

24 A. When -- when I said other than -- you said that
25 one trip. We actually went -- you said to

1 Kinston, though. That's right.

2 Q. Yes, ma'am.

3 A. We went to Snow Hill twice, but we didn't go to
4 Kinston but one time.

5 Q. Okay.

6 A. I want to make sure I'm right in what I'm saying.

7 Q. And other than assisting Ms. Hines in getting her
8 ID to vote, have you assisted any other voters?

9 A. Not this year.

10 Q. And so your experience with Ms. Hines, is that
11 the -- the limit of your experience in assisting
12 voters with obtaining photo ID?

13 A. Since the state have declared that we will have
14 to have a photo ID for voting, yes. I'm sure I
15 did some in the past. I worked as a registered
16 nurse at Cherry Hospital for about 20-some years.
17 I don't know what I've done in the years, but as
18 far as this is concerned, I'm sure this is the
19 only one I've done.

20 Q. Well -- and tell me a little bit about that.
21 When you were a registered nurse at Cherry
22 Hospital, did you have to help people obtain
23 photo IDs then?

24 A. When I was working at Cherry Hospital, I did a
25 lot of things. I can promise you.

1 Q. Yeah.

2 A. And not get photo ID's, but identification was
3 very important. And it was a part of my work to
4 make sure that people had proper paperwork and so
5 forth that we were dealing with.

6 Q. And why was identification important there?

7 A. Because when you admit a patient, you need to be
8 sure you are admitting who you say you admitted.

9 Q. And is that not also true when people vote?

10 A. Sure, it's true when a person vote. They should
11 be who they say they are. But as far as I'm
12 concerned, and as far as I know, I haven't heard
13 of anybody trying to vote that wasn't who they
14 say they were. Have you? I shouldn't probably
15 be asking you questions, but...

16 Q. I can't -- I can't -- yeah, I can't answer
17 questions in the deposition. But --

18 A. Okay.

19 Q. -- but we'll take that as a rhetorical one.

20 A. Okay. I apologize. I am who I am.

21 Q. That's -- that's all right. That's all right.
22 We're having a conversation.

23 A. Okay.

24 Q. That's how conversations go.

25 I'm going to take a quick look at my

1 notes and see if there is anything else that I
2 need to ask you.

3 (Pause.)

4 MR. McKNIGHT: I don't think I have any
5 further questions for you today, Ms. Rouse.

6 MS. RIGGS: Ms. Rouse, I just want to
7 ask one quick follow-up question.

8 EXAMINATION

9 BY MS. RIGGS:

10 Q. When you were working at Cherry Hospital, did
11 people need to have a photo ID in order to get
12 admitted?

13 A. I don't think so.

14 Q. The -- the identification that you were helping
15 them get, that was other kinds of paperwork?

16 A. That was, like, birth certificates and, I guess,
17 other paperwork that they would come and get.

18 MS. RIGGS: Okay. That's all I have.

19 MR. McKNIGHT: I don't have any further
20 questions.

21 [SIGNATURE WAIVED]

22 [DEPOSITION CONCLUDED AT 5:59 P.M.]

23

24

25

1 STATE OF NORTH CAROLINA)
) C E R T I F I C A T E
2 COUNTY OF WAYNE)

3

4 I, JENNIFER C. CARROLL, Court Reporter and
5 Notary Public, the officer before whom the proceeding
6 was conducted, do hereby certify that the witness whose
7 testimony appears in the foregoing proceeding was duly
8 sworn by me; that the testimony of said witness was
9 taken by me to the best of my ability and thereafter
10 transcribed under my supervision; and that the foregoing
11 pages, inclusive, constitute a true and accurate
12 transcription of the testimony of the witness.

13 I do further certify that I am neither
14 counsel for, related to, nor employed by any of the
15 parties to this action, and further, that I am not a
16 relative or employee of any attorney or counsel employed
17 by the parties thereof, nor financially or otherwise
18 interested in the outcome of said action.

19 This the 11th day of June, 2015.

20

21

22

23

Jennifer C. Carroll, RPR, CRR
Notary Public #19923280118

24

25