

Multiple Documents

| Part | Description |
|------|-------------|
| 1 | 11 pages |
| 2 | Exhibit 1 |

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

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

Plaintiffs,

v.

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

Defendants.

**PLAINTIFFS' JOINT
OBJECTIONS TO
DEFENDANTS' RULE 26(a)(3)(A)
PRE-TRIAL DISCLOSURES**

Civil Action No. 1:13-CV-658

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

Plaintiffs,

v.

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

Defendants.

Civil Action No. 1:13-CV-660

UNITED STATES OF AMERICA,

Plaintiff,

v.

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

Defendants.

Civil Action No. 1:13-cv-861

**PLAINTIFFS' JOINT OBJECTIONS TO
DEFENDANTS' RULE 23(a)(3)(A) PRE-TRIAL DISCLOSURES**

Pursuant to the Court's Orders of June 26, 2015 (D.E. 299 in Civil Action No. 1:13-cv-658) and June 4, 2015 (D.E. 271 in Civil Action No. 1:13-cv-658) and Federal Rules of Civil Procedure 26(a)(3) and 32(a)(6), Plaintiffs in the above-referenced actions make the following objections to Defendants' Rule 23(a)(3)(A) Pre-Trial Disclosures [Dkt. 307]:

I. WITNESSES DEFENDANTS EXPECT TO PRESENT OR MAY PRESENT AT TRIAL:

Defendants identified Josh Lawson as a witness they "may call" live at trial. Plaintiffs object because Defendants failed to disclose Lawson in their initial disclosures, discovery responses, or otherwise. Accordingly, Plaintiffs will be prejudiced if Defendants call Mr. Lawson because Defendants failed to properly disclose Mr. Lawson as a potential witness.

II. DEFENDANTS' DESIGNATIONS OF DEPOSITION TESTIMONY FOR TRIAL:

Plaintiffs specific Objections and Counter-designations to Defendants Designations of Deposition Testimony for Trial [Dkt. 306], as well as a condensed copy of the transcript of each deponent's deposition, have been contemporaneously filed along with these Objections to Defendants' Rule 23(a)(3)(A) Pre-Trial Disclosures and are hereby incorporated by reference. Plaintiffs also incorporate by reference all of the specific objections made in the depositions, and reserve the right to further object to any other deposition testimony Defendants seek to introduce into evidence or otherwise rely

on outside of the designations and counter-designations made in accordance with the Court's Pre-trial Order.

In addition to those specific objections, Plaintiffs object to Defendants' entire designations of the deposition testimony of Senator Earline Parmon, Representative Rick Glazier, James Hope, and Lottie Hope for the following reasons:

A. Senator Earline Parmon

Plaintiffs object to the designation of this deposition testimony in its entirety. Plaintiffs have confirmed that Senator Parmon is available and willing to appear at trial voluntarily or by subpoena. Additionally, Senator Parmon resides and works in Winston-Salem, North Carolina within minutes of the courthouse. Defendants have not demonstrated that Senator Parmon is unavailable. Fed. R. Civ. P. 32(a)(4).

Accordingly, Plaintiffs' counter-designations of Senator Parmon's deposition testimony are made subject to the above objection.

B. Representative Rick Glazier

Plaintiffs object to the designation of this deposition testimony in its entirety. Plaintiffs have confirmed that Representative Glazier is available and willing to appear at trial voluntarily or by subpoena. In addition, Defendants are attempting by way of these designations to designate portions of Representative Glazier's deposition testimony given prior to Representative Glazier's live testimony at the preliminary injunction hearing in July 2014, which testimony is part of the record in these proceedings. Representative Glazier was subject to cross examination by Defendants at that time, and the designation of deposition testimony taken prior to that date is therefore inappropriate. Moreover,

Defendants have not demonstrated that Representative Glazier is unavailable to testify at the upcoming trial. Fed. R. Civ. P. 32(a)(4).

Accordingly, Plaintiffs' counter-designations of Representative Glazier's deposition testimony are made subject to the above objections.

C. James Hope

Plaintiffs object to the designation of this deposition testimony in its entirety. Plaintiffs have confirmed that Mr. Hope is available and willing to appear at trial voluntarily or by subpoena. Mr. Hope resides in High Point, North Carolina, which is within 20 miles of the courthouse. Defendants have not demonstrated that Mr. Hope is unavailable to testify in person at the trial. Fed. R. Civ. P. 32(a)(4).

Accordingly, Plaintiffs' counter-designations of Mr. Hope's deposition testimony are made subject to the above objections.

D. Lottie Hope

Plaintiffs object to the designation of this deposition testimony in its entirety. Plaintiffs have confirmed that Ms. Hope is available and willing to appear at trial voluntarily or by subpoena. Ms. Hope resides in High Point, North Carolina, which is within 20 miles of the courthouse. Defendants have not demonstrated that Ms. Hope is unavailable to testify in person at the trial. Fed. R. Civ. P. 32(a)(4).

Accordingly, Plaintiffs' counter-designations of Ms. Hope's deposition testimony are made subject to the above objections.

III. DOCUMENTS AND EXHIBITS, INCLUDING SUMMARIES OF EVIDENCE, THAT DEFENDANTS EXPECT TO OFFER OR MAY OFFER AT TRIAL:

Plaintiffs object to the document disclosed for the first time by Defendants on July 6, 2015 with no identifying or source/custodial information other than the filename of "20150706143905440.pdf" and a North Carolina State Board of Elections document header. Plaintiffs requested additional information from Defendants as to the provenance of this document but received no response until this morning. The late-produced document bears no Bates number, indicating that it was not produced during discovery. The document includes a series of charts with what apparently purports to be data about the usage rates of certain types of voting methods, but with no description as to the parameters used in generating the various categories of information displayed. The document also contains a number of interpretive statements — of the sort that an expert witness might provide about such data. Moreover, the document appears to have been prepared for the purpose of this litigation. In light of the fact that Plaintiffs have had virtually no opportunity to cross-examine any witness on these materials and the out-of-time production of the document by Defendants, as well as the lack of any form of identification as to the source of the information contained in the document, Plaintiffs object to its use at trial.

Plaintiffs hereby submit their Objections to Defendants' Documents and Exhibits, Including Summaries of Evidence, That Defendants Expect to Offer or May Offer at Trial [Dkt. 307-1] at **Attachment 1**.

Dated: July 8, 2015

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on July 8, 2015, I electronically filed the foregoing Plaintiffs' Joint Objections to Defendants' Rule 26(a)(3)(A) Pretrial Disclosures, using the CM/ECF system in case numbers 1:13- cv-658, 1:13- cv-660, and 1:13-cv-861, which will send notification of such filing to all counsel of record, including those counsel listed below.

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| DEPONENT NAME | EXHIBIT NUMBER FROM DEPOSITION | DESCRIPTION | PLAINTIFFS' OBJECTIONS |
|--|--------------------------------|--|-------------------------|
| EXHIBITS FROM DEPOSITIONS OF PLAINTIFFS AND PLAINTIFFS-INTERVENORS | | | |
| 30(b)(6) - Barbee's Chapel Missionary Baptist Church by Lonnie Gene Hatley | NAACP 27 | Plaintiff Barbee's Chapel Missionary Baptist Church, Inc.'s Responses and Specific Objections to Defendants' First Set of Interrogatories | |
| 30(b)(6) - Barbee's Chapel Missionary Baptist Church by Lonnie Gene Hatley | NAACP 28 | Plaintiff Barbee's Chapel Missionary Baptist Church, Inc.'s Responses and Specific Objections to Defendants' Second Set of Interrogatories | |
| 30(b)(6) - Covenant Presbyterian Church by Rev, Jimmie Hawkins | NAACP 15 | Plaintiff Covenant Presbyterian Church's Responses and Specific Objections to Defendants' First Set of Interrogatories | |
| 30(b)(6) - Covenant Presbyterian Church by Rev. Jimmie Hawkins | NAACP 16 | Plaintiff Covenant Presbyterian Church's Responses and Specific Objections to Defendants' Second Set of Interrogatories | |
| 30(b)(6) - Covenant Presbyterian Church by Rev. Jimmie Hawkins | NAACP 17 | Email string dated 10.03.12 - 10.05.12 re "Clarification of part of Covenant "Souls to the Polls" Proposal" | Relevance; 403; Hearsay |
| 30(b)(6) - Covenant Presbyterian Church by Rev. Jimmie Hawkins | NAACP 18 | Email dated 06.20.13 re "Voter Registration Saturday (June 29)" | Hearsay |
| 30(b)(6) - Emmanuel Baptist Church by John Mendez | NAACP 19 | Plaintiff Emmanuel Baptist Church's Responses and Specific Objections to Defendants' First Set of Interrogatories | |
| 30(b)(6) - Emmanuel Baptist Church by John Mendez | NAACP 20 | Plaintiff Emmanuel Baptist Church's Responses and Specific Objections to Defendants' Second Set of Interrogatories | |
| 30(b)(6) - Emmanuel Baptist Church by John Mendez | NAACP 21 | Emmanuel Baptist Church 2012-2013 Goals and Objectives | Relevance; 403 |
| 30(b)(6) - Emmanuel Baptist Church by John Mendez | NAACP 22 | Emmanuel Baptist Church Meeting Minutes | |
| 30(b)(6) - Emmanuel Baptist Church by John Mendez | NAACP 23 | Emmanuel Baptist 2010 Finance Report and 2011 Proposed Budget | Relevance; 403; Hearsay |
| 30(b)(6) - NC State Conference of NAACP by Rev. William Barber | 1 | Defendants' Joint Third Amended Notice of Rule 30(b)(6) Deposition of N.C. State Conference of NAACP | Relevance |
| 30(b)(6) - NC State Conference of NAACP by Rev. William Barber | 2 | Second Amended Complaint | |
| 30(b)(6) - NC State Conference of NAACP by Rev. William Barber | 3 | Plaintiff North Carolina State Conference of the NAACP's Responses and Specific Objections to Defendants' Second Set of Interrogatories | |
| 30(b)(6) - NC State Conference of NAACP by Rev. William Barber | 5 | NAACP 2010 Manual on Branch Election Procedures | |

NAACP v. McCrory
Case Nos. 13-CV-658, -660, -861

ATTACHMENT 1: PLAINTIFFS' JOINT OBJECTIONS TO DEFENDANTS' DOCUMENTS AND EXHIBITS, INCLUDING SUMMARIES OF EVIDENCE, THAT DEFENDANTS EXPECT TO OFFER OR MAY OFFER AT TRIAL

| DEPONENT NAME | EXHIBIT NUMBER FROM DEPOSITION | DESCRIPTION | PLAINTIFFS' OBJECTIONS |
|--|--------------------------------|--|-------------------------|
| 30(b)(6) - NC State Conference of NAACP by Rev. William Barber | 6 | Article entitled "Voter Suppression Alleged in Cincinnati NAACP Election" | Relevance; 403; Hearsay |
| 30(b)(6) - NC State Conference of NAACP by Rev. William Barber | 7 | Article entitled "Judge Halts Cincinnati NAACP Election" | Relevance; 403; Hearsay |
| 30(b)(6) - NC State Conference of NAACP by Rev. William Barber | 8 | Article entitled "NAACP Election will be Monitored" | Relevance; 403; Hearsay |
| 30(b)(6) - NC State Conference of NAACP by Rev. William Barber | 9 | Article entitled "Local NAACP Election Voided by National Office" | Relevance; 403; Hearsay |
| 30(b)(6) - NC State Conference of NAACP by Rev. William Barber | 10 | NC NAACP Letter to Representative David Lewis re "Voter Suppression Tactics of the Republican Led NC General Assembly" | |
| 30(b)(6) - NC State Conference of NAACP by Rev. William Barber | 11 | Senate Bill 568/S.L. 1999-455 (=H724); Absentee Voting Changes 1999-2000 Session | Relevance |
| 30(b)(6) - NC State Conference of NAACP by Rev. William Barber | 12 | Email dated 06.01.10 re "2110" with attachment 2010 hkonj action steps for booklet final; batesstamped NCSC00007808 - 7814 | |
| 30(b)(6) - NC State Conference of NAACP by Rev. William Barber | 13 | Letter to Governor Pat McCrory from NC NAACP - batesstamped NCSC00006979-6981; and Letter to Hon. Garland Pierce dated 01.30.13 batesstamped NCSC00007005-7008 | |
| 30(b)(6) - NC State Conference of NAACP by Rev. William Barber | 16 | Article entitled "A Report of the United States Commission on Civil Rights - 1968" | Relevance; 403; Hearsay |
| 30(b)(6) - NC State Conference of NAACP by Rev. William Barber | 18 | Urbanomics "Voter Empowerment Training" batesstamped NCSC00001036-1070 | |
| 30(b)(6) - NC State Conference of NAACP by Rev. William Barber | 19 | Article entitled "An Election Year Guide for Faith-Based Organizations" batesstamped NCSC00000893-896 | |
| 30(b)(6) - NC State Conference of NAACP by Rev. William Barber | 20 | Urbanomics "Voter Empowerment Training" batesstamped NCSC00000897-912 | |
| 30(b)(6) - NC State Conference of NAACP by Rev. William Barber | 21 | Email dated 07.25.13 re NC NAACP "Action Alert: Call your Representative and Say "NO!" to Voter Suppression" batesstamped NCSC00007996-7998 | |
| 30(b)(6) - NC State Conference of NAACP by Rev. William Barber | 23 | NC NAACP Immediate Release Letter re "Partisan Gerrymandering and a Negative Impact on Section 5 Counties in the Congressional Maps" batesstamped NCSC00002408 | |

| DEPONENT NAME | EXHIBIT NUMBER FROM DEPOSITION | DESCRIPTION | PLAINTIFFS' OBJECTIONS |
|--|--------------------------------|---|------------------------|
| 30(b)(6) - NC State Conference of NAACP by Rev. William Barber | 24 | NC NAACP Immediate Release Letter re "On the Day of Public Hearings NC NAACP Questions Incomplete Redistricting Maps" batesstamped NCSC00002406 | |
| 30(b)(6) - NC State Conference of NAACP by Rev. William Barber | 25 | Letter from Dr. Barber batesstamped NCSC00001801-1802 | |
| 30(b)(6) - NC State Conference of NAACP by Rev. William Barber | 26 | Forward Together Moral Movement Timeline batesstamped NCSC00000755-762 | |
| 30(b)(6) - NC State Conference of NAACP by Rev. William Barber | 27 | Gmail dated 12.30.13 re "North Carolina Must Make a Choice" batesstamped NCSC00000299-301 | |
| 30(b)(6) - NC State Conference of NAACP by Rev. William Barber | 28 | NC NAACP State Conference Voter Empowerment Expenses 2010-2014 | |
| 30(b)(6) - NC State Conference of NAACP by Rev. William Barber | 29 | NC NAACP Press Release re "My Prayer for the Heart of our State and Nation" batesstamped NCSC00002196-2199 | |
| 30(b)(6) - NC State Conference of NAACP by Rev. William Barber | 30 | Realizing Transformational Movement in the South - North Carolina NAACP Forward Together! Moral Freedom Summer 2014- Stratgic Plan; batesstamped NCSC00000792-797 | |
| 30(b)(6) - NC State Conference of NAACP by Rev. William Barber | 31 | Article entitled "Four Positive Actions for 2014" batesstamped NCSC00000307 | |
| 30(b)(6) - NC State Conference of NAACP by Rev. William Barber | 32 | Article entitled "New Voter Suppression Law Threatens the Right to Vote in North Carolina" batesstamped NCSC00003041 | |
| 30(b)(6) - NC State Conference of NAACP by Rev. William Barber | 33 | Article entitled "Campaigns/Civic Engagements - Steps to Registering Voters" batesstamped NCSC00002750-2754 | |
| 30(b)(6) - NC State Conference of NAACP by Rev. William Barber | 34 | Letter from David R. Lewis to NC NAACP dated 02.20.13 batesstamped NCSC00007004 and NCSC00006982 | |
| 30(b)(6) - NC State Conference of NAACP by Rev. William Barber | 35 | NC State Board of Elections letter to NC NAACP dated 03.06.15 | Hearsay |
| 30(b)(6) - NC State Conference of NAACP by Rev. William Barber | 36 | NC NAACP Immediate Release re "Open Letter" batesstamped NCSC00002454-2455 | |
| 30(b)(6) - NC State Conference of NAACP by Rev. William Barber | 37 | NC NAACP Immediate Release re "NC NAACP Statement: the Investiture of Justice Wynn" batesstamped NCSC00002346 | |

| DEPONENT NAME | EXHIBIT NUMBER FROM DEPOSITION | DESCRIPTION | PLAINTIFFS' OBJECTIONS |
|--|--------------------------------|---|------------------------|
| 30(b)(6) - NC State Conference of NAACP by Rev. William Barber | 38 | Email from Eleanor Kinnard to Erin Byrd re "Meeting" batesstamped NCSC00007854-7855 | Hearsay |
| 30(b)(6) - NC State Conference of NAACP by Rev. William Barber | 39 | Article entitled "Your Decision, Your Power, Your Vote" batesstamped NCSC00000109-134 | Hearsay |
| 30(b)(6) - NC State Conference of NAACP by Rev. William Barber | 40 | NC NAACP Immediate Release re "All Souls to the Polls" batesstamped NCSC00003027-3030 | |
| 30(b)(6) - NC State Conference of NAACP by Rev. William Barber | 41 | Copy of CD "NC NAACP Freedom Fund Banquet" played during deposition | |
| 30(b)(6) - NC State Conference of NAACP by Rev. William Barber | 42 | Transcript of CD "NC NAACP Freedom Fund Banquet" | |
| 30(b)(6) - NC State Conference of NAACP by Rev. William Barber | 43 | NC NAACP Immediate Release re "North Carolina NAACP's Statement on Voter ID" batesstamped NCSC00002329 | |
| 30(b)(6) - Unifour Onestop by Renee Michaux | LWV 1 | Complaint | Hearsay; Foundation |
| 30(b)(6) - Unifour Onestop by Renee Michaux | LWV 8 | Form 990 for the year 2012 re Unifour Onestop, batesstamped LWV0000000748-765 | Relevance |
| 30(b)(6) - Unifour Onestop by Renee Michaux | LWV 9 | Form 990-EX for the year 2013 re Unifour Onestop | Relevance |
| 30(b)(6) - Unifour Onestop by Renee Michaux | LWV 10 | Plaintiff Unifour One's Response to Defendants' First Set of Interrogatories to The League of Women Voters of North Carolina Plaintiff Group | Hearsay; Foundation |
| 30(b)(6) - Unifour Onestop by Renee Michaux | LWV 11 | Plaintiff Unifour One's Response to Defendants' Second Set of Interrogatories to The League of Women Voters of North Carolina Plaintiff Group | Hearsay; Foundation |
| 30(b)(6) - Unifour Onestop by Renee Michaux | LWV 13 | Unifour One Mission Statement, batesstamped LWV0000000663- 665 | |
| 30(b)(6) - Unifour Onestop by Renee Michaux | LWV 14 | High School Voter Registration Project Activity Worksheets, batesstamped LWV0000000666-677 | Relevance |
| 30(b)(6) - Unifour Onestop by Renee Michaux | LWV 15 | Document entitled "Make Your Voice Heard: Vote!", batesstamped LWV0000000663-64 | |
| 30(b)(6) - Unifour Onestop by Renee Michaux | LWV 16 | Guilford County 2014 Voter Guide, batesstamped LWV0000000666- 689 | Hearsay; Authenticity |
| Berduo, Josue | Berduo 1 | NC Public Voter Information - Josue Berduo | |
| Brandon, Kay | LWV 1 | Complaint | Hearsay; Foundation |
| Brandon, Kay | LWV 2 | Declaration of Kay Gordon Brandon | |
| Brandon, Kay | LWV 3 | Guilford County 2014 Voter Guide | Hearsay; Authenticity |
| Brandon, Kay | LWV 4 | New Rules for Voting wallet guide | Hearsay; Authenticity |

NAACP v. McCrory
Case Nos. 13-CV-658, -660, -861

ATTACHMENT 1: PLAINTIFFS' JOINT OBJECTIONS TO DEFENDANTS' DOCUMENTS AND EXHIBITS, INCLUDING SUMMARIES OF EVIDENCE, THAT DEFENDANTS EXPECT TO OFFER OR MAY OFFER AT TRIAL

| DEPONENT NAME | EXHIBIT NUMBER FROM DEPOSITION | DESCRIPTION | PLAINTIFFS' OBJECTIONS |
|----------------------------|--------------------------------|--|------------------------|
| Brandon, Kay | LWV 5 | Plaintiff Kay Brandon's Response to Defendants' First Set of Interrogatories to The League of Women Voters of North Carolina Plaintiff Group | Hearsay; Foundation |
| Brandon, Kay | LWV 6 | Guilford County In-Pereson Early Voting Schedules and Voting Tips | Hearsay; Authenticity |
| Brandon, Kay | LWV 7 | Guilford County 2012 Voter Guide, batesstamped 000000038-57 | Hearsay; Authenticity |
| Coleman, Carolyn | NAACP 29 | Declaration of Carolyn O. Coleman | |
| Coleman, Carolyn | NAACP 30 | Plaintiff Carolyn Coleman's Responses and Specific Objections to Defendant' First Set of Interrogatories | |
| Eaton, Armenta | NAACP 19 | Plaintiff Armenta Eaton's Responses and Specific Objections to Defendants' First Set of Interrogatories | |
| Eaton, Armenta | NAACP 20 | Document entitled "Do it Again in 2010" | |
| Eaton, Armenta | NAACP 21 | Document entitled "Your Vote is Your Voice, Your Right...Use It" | |
| Eaton, Armenta | NAACP 22 | Document entitled "Needing Ride to the Polls" | |
| Eaton, Armenta | NAACP 23 | Get Out The Vote Telephone Calling Script | |
| Eaton, Armenta | NAACP 24 | Document entitled "Why Vote in 2013?" | Relevance; Hearsay |
| Eaton, Rosanell | NAACP 1 | Drivers License of Rosa Johnson Eaton | |
| Eaton, Rosanell | NAACP 2 | Drivers License of Rosanell Eaton | |
| Eaton, Rosanell | NAACP 3 | Franklin County Voter Card re Rosanell Eaton | |
| Eaton, Rosanell | NAACP 4 | Birth Certificate re Rosa Nell Johnson | |
| Eaton, Rosanell | NAACP 5 | Plaintiff Rosanell Eaton's Responses and Specific Objections to Defendants' Fist Set of Interrogatories | |
| Eaton, Rosanell | NAACP 6 | Handwritten letter from Rosanell Eaton | |
| Ferguson-Kelly, Jocelyn | NAACP 14 | Plaintiff Jocelyn Ferguson-Kelly's Responses and Specific Objections to Defendants' First Set of Interrogatories | |
| Jackson, Faith Rynae | NAACP 11 | Plaintiff Faith Jackson's Responses and Specific Objections to Defendants' First Set of Interrogatories | |
| Jackson, Faith Rynae | NAACP 12 | NC Public Voter Information re Faith Rynae Jackson | |
| Jackson, Faith Rynae | NAACP 13 | My Voter Page re Faith Rynae Jackson | |
| Lund, Nancy | 1NL | Declaration of Nancy J. Lund | |
| Lund, Nancy | 2NL | Document entitled "Calls made 11.3,14" | |
| Lund, Nancy | 3NL | Document containing list of names and address and handwritten notes | |
| Lund, Nancy | 4NL | VoteBuilder North Carolina document | |
| Lund, Nancy | 5NL | North Carolina Voter Registration Application for Sheldon Hudlin | |
| Mock, Becky | Ex 1 | Email string dated 11.12.14 - 02.28.15 re "It's All Fun and Games Until Someone Gets Purged" | |
| Mock, Becky | Ex 2 | Various screen shots of Becky Mock's Facebook Postings | |
| Palmer, Maria Teresa Unger | NAACP 8 | Plaintiff Maria Palmer's Responses and Specific Objections to Defendants' First Set of Interrogatories | |
| Palmer, Maria Teresa Unger | NAACP 9 | Drivers License and Voter ID Card of Maria Unger Palmer | Relevance |
| Palmer, Maria Teresa Unger | NAACP 10 | Declaration of Maria Teresa Unger Palmer | |
| Palmer, Maria Teresa Unger | NAACP 11 | Document entitled "WCHL Commentary", batesstamped NCSC00001205 | 403 |
| Perry, Mary | NAACP 7 | Plaintiff Mary Perry's Responses and Specific Objections to Defendants' First Set of Interrogatories | |

ATTACHMENT 1: PLAINTIFFS' JOINT OBJECTIONS TO DEFENDANTS' DOCUMENTS AND EXHIBITS, INCLUDING SUMMARIES OF EVIDENCE, THAT DEFENDANTS EXPECT TO OFFER OR MAY OFFER AT TRIAL

| DEPONENT NAME | EXHIBIT NUMBER FROM DEPOSITION | DESCRIPTION | PLAINTIFFS' OBJECTIONS |
|---|--------------------------------|--|--|
| Wells, Goldie Ann Frinks | LWV 38 | Plaintiff Goldie Wells' Response to Defendants' First Set of Interrogatories to The League of Women Voters of North Carolina Plaintiff Group | Hearsay; Foundation |
| Wells, Goldie Ann Frinks | LWV 39 | Plaintiff Goldie Wells' Responsive Documents bates-stamped LWV000000033, LWV000000038 - LWV000000059, LWV000000060 - LWV000000061, and a one-page document entitled "Challenge to Voting Suppression Law - Plaintiff Talking Points" | LWV000000033 - Hearsay; Authenticity; Relevance; LWV000000038 - LWV000000059 - Hearsay; Authenticity; LWV000000060 - LWV000000061 - Hearsay; Authenticity; "Challenge to Voting Suppression Law - Plaintiff Talking Points" - Privilege; Hearsay; Authenticity |
| EXHIBITS FROM DEPOSITIONS OF FACT WITNESSES IDENTIFIED BY PLAINTIFFS | | | |
| Banks, Victoria | Banks 1 | Multipartisan Assistance Teams Document | Foundation |
| Bartlett, Gary | 152 | Bartlett Affidavit | |
| Bartlett, Gary | 153 | 2012 Elections Mail Verficiation Analysis of New Voters | |
| Brown, Carnell | CB1 | Photograph of Carnell Brown's residence (this is in color in DMS) | |
| Brown, Carnell | CB2 | Copy of front of Carnell Brown's ID card (this is in color in DMS) | |
| Brown, Carnell | CB3 | Copy of back of Carnell Brown's ID card (this is in color in DMS) | |
| Budzinski, Cheryl | Budzinski 1 | Handwritten Notes detailing wait in line at precinct | |
| Carr, Emma | Carr 1 | Emma Carr - NC Public Voter Information | |
| Chalmers, Jakia | Chalmers 1 | Jakia Chalmers - NC Public Voter Information | |
| Chalmers, Jakia | Chalmers 2 | Jakia Chalmers - North Carolina Voter Registration Application | |
| Cunningham, Terrilin | Cunningham 2 | Printout from Facebook account of Terrilin Cunningham | |
| Cunningham, Terrilin | Cunningham 3 | Terrilin Cunningham - NC Public Voter Information | |
| Cunningham, Terrilin | Cunningham 4 | Google map from 161 Union Street S, Concord NC to 331 Corban Ave SE, Concord NC | |
| Dickerson, Michael | 161 | Mecklenburg County Board of Elections, Election Day Summary, 11.05.13 General dated 02.04.14, Bates 19-1 - 19-2 | Foundation |
| Dickerson, Michael | 162 | Declaration of Michael Dickerson | Hearsay, waived subject to conditions of Joint Stipulation |
| Dickerson, Michael | 163 | Listing of first and last votes cast in elections from 09.13.11, first page entitled 09.13.11 First/Last Vote | Foundation |
| Ealy, Alexander | Ealy 1 | Alexander Ealy - North Carolina Voter Registration Application | Hearsay; Authenticity; Foundation |
| Ealy, Alexander | Ealy 2 | Alexander Ealy - Cumberland County Provisional Voting Application | Hearsay; Authenticity |
| Ealy, Alexander | Ealy 3 | Alexander Ealy - North Carolina Voter Registration Application | Hearsay; Authenticity; Foundation |
| Farrington, Gwen | Farrington 1 | Gwendolyn Farrington - Provisional Voting Application | |
| Fisher, Kelvin | Fisher 1 | 2014 Voting & Election Day Irregularities Incident Report Form | |
| Fisher, Kelvin | Fisher 2 | Kelvin Fisher - North Carolina Voter Registration Application | |
| Fisher, Kelvin | Fisher 3 | Kelvin Fisher - NC Public Voter Information | |
| Gignac, Elizabeth | Gignac 1 | Elizabeth Gignac - NC Public Voter Information | |
| Gignac, Elizabeth | Gignac 2 | Email dated 10.21.14 from E Gignac re "voter registration mismanagement" | |
| Gignac, Elizabeth | Gignac 3 | Email string dated 10.21.14 from Gignac re "voter registration mismanagement" | |
| Gignac, Elizabeth | Gignac 4 | Ltr to E Gignac from Cumberland Co BOE re Notice of Late Voter Registration | Hearsay; Authenticity; Foundation |

ATTACHMENT 1: PLAINTIFFS' JOINT OBJECTIONS TO DEFENDANTS' DOCUMENTS AND EXHIBITS, INCLUDING SUMMARIES OF EVIDENCE, THAT DEFENDANTS EXPECT TO OFFER OR MAY OFFER AT TRIAL

| DEPONENT NAME | EXHIBIT NUMBER FROM DEPOSITION | DESCRIPTION | PLAINTIFFS' OBJECTIONS |
|----------------------|--------------------------------|---|--|
| Gignac, Elizabeth | Gignac 5 | Email string dated 10.21.14 from Gignac re "voter registration mismanagement" | |
| Glazier, Rep. Rick | 150 | Glazier Declaration | |
| Green, Miriam | Green 1 | Voter Rights Coalition of Cateret County 2014 Project Report | |
| Green, Miriam | Green 2 | Voter Rights Coalition of Cateret County Project Summary - 2014 | |
| Green, Miriam | Green 3 | Summary of 11/14/14 Poll Monitoring, Fort Benjamin Park, Newport NC | |
| Green, Miriam | Green 4 | 2014 Voting & Election Day Irregularities Incident Report Form re William Meadows | |
| Green, Miriam | Green 5 | 2014 Voting & Election Day Irregularities Incident Report Form re Debbie Dybowski | |
| Green, Miriam | Green 6 | 2014 Voting & Election Day Irregularities Incident Report Form re Stacey Ellege | |
| Green, Miriam | Green 7 | 2014 Voting & Election Day Irregularities Incident Report Form re . Michael McClure | |
| Green, Miriam | Green 8 | NC Public Voter Information for William Meadows | Foundation |
| Green, Miriam | Green 9 | NC Public Voter Information for Stacey Lynn Ellege | Foundation |
| Jensen, Jorgen | Jensen 1 | Jorgen Jensen - NC Public Voter Information | |
| Jensen, Jorgen | Jensen 2 | Jorgen Jensen - North Carolina Voter Registration Application | Hearsay; Authenticity; Foundation |
| Jensen, Jorgen | Jensen 3 | Jorgen Jensen - North Carolina Voter Registration Application | Hearsay; Authenticity; Foundation |
| Jensen, Jorgen | Jensen 4 | Jorgen Jensen - Wayne Co. Provisional Voting Application | Hearsay; Authenticity; Foundation |
| Jordan, Carlton Jr. | 1 | Carlton Jordan Jr. - NC Public Voter Information | |
| Jordan, Carlton Jr. | 2 | Carlton Jordan Jr. - Copy of Official Election Card | Hearsay; Authenticity |
| Manley, James | Manley 1 | James Manley -NC Public Voter Information | |
| Owens, Michael | Owens 1 | Michael Owens - NC Public Voter Information | |
| Owens, Michael | Owens 2 | Google Map of 192 Jasper Dr., Shannon NC to 62 Park Street, Shannon,NC | Hearsay; Authenticity; Foundation |
| Parmon, Sen. Earline | 155 | Declaration of Senator Earline Parmon Bates JA0269-JA0286 | |
| Parmon, Sen. Earline | 156 | General Assembly Bill History - House Bill 3/S.L. 2003-434 | Foundation |
| Parmon, Sen. Earline | 157 | Transcript of Session on Session on Novmeber 24, 2003 Redistricting Plan | Authenticity; Relevance; Hearsay; Foundation |
| Parmon, Sen. Earline | 158 | North Carolina House of Representatives Voting Tally | Foundation |
| Parmon, Sen. Earline | 159 | One-stop Voting tally on House Bill | Foundation |
| Parmon, Sen. Earline | 160 | Senate vote tally on House Bill 91 | Foundation |
| Patillo, Timothy | Patillo 1 | Timothy Patillo - NC Public Voter Information | |
| Pitt, Tawanda | Pitts 1 | Tawanda Pitts - NC Public Voter Information | |
| Rhinehart, Candi | Rhinehart 1 | Email chain re "Voter Fraud Actions needed now" | |
| Rhinehart, Candi | Rhinehart 2 | Email chain re "Voter Fraud Actions needed now" | |
| Rhinehart, Candi | Rhinehart 3 | Email re "Possible Absentee Fraud" | |
| Rhinehart, Candi | Rhinehart 4 | Email re "Undeliverable: FW: NC voter fraud revised addition" | Foundation |
| Schaffer, Susan | Schaffer 1 | 2014 Voting & Election Day Irregularities Incident Report Form | |
| Schaffer, Susan | Schaffer 2 | Facebook page of Susan Schaffer | Relevance; 403; Hearsay |
| Smith, Brandi | Smith 1 | Certificate of Relief Petition and Order | Hearsay, Authenticity |
| Smith, Brandi | Smith 2 | Brandi Smith - NC Public Voter Information | |
| Smith, Brandi | Smith 3 | Brandi Smith - Provisional Voting Application | Hearsay, Authenticity |

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| DEPONENT NAME | EXHIBIT NUMBER FROM DEPOSITION | DESCRIPTION | PLAINTIFFS' OBJECTIONS |
|--|--------------------------------|---|--|
| Smith, Brandi | Smith 4 | Transcript of Plea | Hearsay, Authenticity |
| Smith, Brandi | Smith 5 | Conditional Discharge Under G.S. 90-96(a) | Hearsay, Authenticity; 403 |
| Smith, Brandi | Smith 6 | Disposition/Modification of Deferred Prosecution or Conditional Discharge | Hearsay; Authenticity |
| Smith, Brandi | Smith 7 | Ltr from Staff Attorney Bethan Eynon to Carteret Co. BOE Chairwoman Sue Verdon re B Smith eligibility to vote | Rule of Completeness |
| Socol, Max | Socol 1 | 2014 Voting & Election Day Irregularities Incident Report Form | Authenticity |
| Socol, Max | Socol 2 | 2014 Voting & Election Day Irregularities Incident Report Form | |
| Socol, Max | Socol 3 | 2014 Voting & Election Day Irregularities Incident Report Form | |
| Socol, Max | Socol 4 | 2014 Voting & Election Day Irregularities Incident Report Form | |
| Socol, Max | Socol 5 | 2014 Voting & Election Day Irregularities Incident Report Form | |
| Suggs, Gerrick | Suggs 1 | Gerrick Suggs —Copy of Driver's License | Relevance |
| Suggs, Gerrick | Suggs 2 | Gerrick Suggs - NC Public Voter Information | |
| Suggs, Gerrick | Suggs 3 | Two-page document- screen shot of voter registrant information | |
| Suggs, Gerrick | Suggs 4 | Gerrick Suggs - Voter Registration | |
| Suggs, Gerrick | Suggs 5 | Gerrick Suggs - Authorization to Vote | |
| Suggs, Gerrick | Suggs 6 | Gerrick Suggs - Provisional Voting Registration/Update Form | |
| Suggs, Gerrick | Suggs 7 | Gerrick Suggs- Application to Register to Vote | |
| Suggs, Gerrick | Suggs 8 | Gerrick Suggs - North Carolina Voter Registration Application | |
| Suggs, Gerrick | Suggs 9 | Gerrick Suggs - Provisional Voting Registration/Update Form | |
| Washington, Timothy | Washington 1 | Google Map of 508 E. Walnut St., Goldsboro NC to 601 Royal! Ave., Goldsboro NC | Hearsay; Authenticity; Foundation |
| Washington, Timothy | Washington 2 | Google Map of 508 E. Walnut St., Goldsboro NC to Wayne Co. Public Library, Goldsboro NC | Hearsay; Authenticity; Foundation |
| Washington, Yvonne | Washington 3 | Provisional Voter Instructions | |
| White, Rosa Elena | White 1 | Rosa White - NC Public Voter Information | |
| White, Rosa Elena | White 2 | Elena White - North Carolina Voter Registration Application | |
| White, Rosa Elena | White 3 | Pender Co. BOE "Request for Identification Information" letter to Elena White | |
| White, Rosa Elena | White 4 | Pender Co. BOE "Request for Identification Information" letter to Elena White | |
| Wilson, Malcolm | Wilson 1 | Malcolm Wilson - NC Public Voter Information | |
| Wilson, Malcolm | Wilson 2 | Malcolm Wilson - Pitt County Provisional Voting Application | |
| EXHIBITS FROM DEPOSITIONS OF FACT AND EXPERT WITNESSES IDENTIFIED BY DEFENDANTS | | | |
| Churchill, Erika | 520 | Affidavit of R. Erika Churchill with Exhibits | Hearsay, waived subject to conditions of Joint Stipulation |
| Degraffenreid, Veronica | 333 | November 2014 Analysis of Voter wait times | Hearsay; Authenticity; Rule of Completeness; Foundation |
| Fetzer, Tom | 75 | Fetzer Declaration | Hearsay, waived subject to conditions of Joint Stipulation |
| Hofeller, Thomas | 83; 84-102 | Hofeller Declaration and Exhibits | Hearsay, waived subject to conditions of Joint Stipulation |
| Hofeller, Thomas | 86 | April 2013 SBE report | Hearsay, waived subject to conditions of Joint Stipulation |

ATTACHMENT 1: PLAINTIFFS' JOINT OBJECTIONS TO DEFENDANTS' DOCUMENTS AND EXHIBITS, INCLUDING SUMMARIES OF EVIDENCE, THAT DEFENDANTS EXPECT TO OFFER OR MAY OFFER AT TRIAL

| DEPONENT NAME | EXHIBIT NUMBER FROM DEPOSITION | DESCRIPTION | PLAINTIFFS' OBJECTIONS |
|------------------|--------------------------------|---|--|
| Hofeller, Thomas | 400 | Hofeller resume | Hearsay, waived subject to conditions of Joint Stipulation |
| Hofeller, Thomas | 401-410 | Hofeller Declaration and Exhibits | Hearsay, waived subject to conditions of Joint Stipulation |
| Hood, M.V. | 375 | Hood Report | Hearsay, waived subject to conditions of Joint Stipulation |
| Justice, Carolyn | 177 | Declaration | Hearsay, waived subject to conditions of Joint Stipulation |
| Justice, Carolyn | 179-205 | Various roll call votes | Authenticity; Hearsay; Best-Evidence; Relevance |
| Neesby, Brian | 441 | November 2014 SBE Analysis of DMV Data | Hearsay; Hearsay within hearsay; Foundation |
| Poucher, Cherie | 206 | Poucher Affidavit | Hearsay, waived subject to conditions of Joint Stipulation |
| Roberts, Dean | 1 | NC General Assembly Joint Legislative Elections Oversight Committee Transcript of Proceedings 04.02.14 | |
| Roberts, Dean | 3 | Forsyth County Board of Elections Board Meeting Minutes 09.03.12 | Hearsay; Foundation |
| Roberts, Dean | 4 | Forsyth County Board of Elections Board Meeting Minutes 10.15.13 | Hearsay; Foundation |
| Roberts, Dean | 5 | Photocopy of Postcard Mailing | Foundation |
| Roberts, Dean | 6 | Excerpts of Deposition of Gary Bartlett | |
| Roberts, Dean | 7 | Declaration of Charles Underwood | Hearsay; Foundation |
| Strach, Kim | 7 | One stop locations for 2010 General Election | |
| Strach, Kim | 30 | Presentation to Joint Legislative Oversight Committee | |
| Strach, Kim | 41 | 2012 Mail Verification Report for New Voters | |
| Strach, Kim | 47 | 01.07.13 DMV matching report 03.05.13 Supplemental Analysis | |
| Strach, Kim | 170 | Affidavit of Kim Strach (registration, list maintenance, state sharing program, SDR issues, one stop, mail-in absentee, out of precinct, registration of 17 year olds, outreach | Hearsay, waived subject to conditions of Joint Stipulation |
| Strach, Kim | 171 | NC registration application | |
| Strach, Kim | 173 | Absentee Ballot Request Form | |
| Strach, Kim | 357 | Strach Affidavit (outreach) with Exhibits | Hearsay; Cumulative; Relevance (challenge to photo ID requirement deferred per 13-cv-861, ECF No. 282 ¶ 3) |
| Strach, Kim | 358 | Strach Affidavit (line analysis) with Exhibits | Hearsay; Hearsay within hearsay; Foundation |
| Strach, Kim | 359 | Survey Monkey Exhibit | Hearsay; Hearsay within hearsay; Foundation |
| Strach, Kim | 360 | Interview of county officials with lines over 1 hour exhibit | Hearsay; Hearsay within hearsay; Foundation |
| Strach, Kim | 361 | Underwood Affidavit with Exhibits | Hearsay within hearsay; Foundation |
| Strach, Kim | 367 | Robeson County Hearing | Hearsay |
| Thornton, Janet | 123 | 04.25.14 Thornton Report | Hearsay, waived subject to conditions of Joint Stipulation |
| Thornton, Janet | 124 | 04.11.14 Stewart Report | |
| Thornton, Janet | 125 | Analysis of 2010/2014 primary turnout | Hearsay, waived subject to conditions of Joint Stipulation |
| Thornton, Janet | 126 | 05.02.14 Stewart Sur-Rebuttal Report | |

| DEPONENT NAME | EXHIBIT NUMBER FROM DEPOSITION | DESCRIPTION | PLAINTIFFS' OBJECTIONS |
|--|--------------------------------|---|--|
| Thornton, Janet | 412 | Second Declaration of Dr. Thornton | Hearsay, waived subject to conditions of Joint Stipulation |
| Thornton, Janet | 413 | Thornton Addendum | Hearsay, waived subject to conditions of Joint Stipulation; Not timely disclosed |
| Thornton, Janet | 414 | Thornton Report/Declaration | Hearsay, waived subject to conditions of Joint Stipulation |
| Thornton, Janet | 415 | Turnout analysis by race for 2010/2014 primaries | Hearsay, waived subject to conditions of Joint Stipulation |
| Thornton, Janet | 416 | Dr. Allen Lichtman Report | |
| Thornton, Janet | 417 | Dr. Allen Lichtman Report | |
| Trende, Sean | 103 | Trende Report with Exhibits | Hearsay, waived subject to conditions of Joint Stipulation |
| Trende, Sean | 104 | Stewart Figure 11 showing number of days of early voting by state | |
| Trende, Sean | 121 | Supplement to 04.25.14 Trende Report | Hearsay, waived subject to conditions of Joint Stipulation |
| Trende, Sean | 122 | Virginia low voter turnout 1998-2012 | Hearsay, waived subject to conditions of Joint Stipulation |
| Trende, Sean | 434 | Trende Declaration | Hearsay, waived subject to conditions of Joint Stipulation |
| Trende, Sean | 435 | Burden Declaration | |
| Trende, Sean | 436 | Burden Declaration | |
| Underwood, Charles | 437 | Declaration of Charles Underwood | Hearsay; Foundation |
| Webb, Barbara | 218 | Required Documents Schedule | Foundation |
| Webb, Barbara | 221 | VIVA Memo to Examiners | |
| EXHIBITS FROM DEPOSITIONS OF PLAINTIFFS' EXPERT WITNESSES | | | |
| Allen, Theodore Dr. | 130 | Rule 26(a)(2)(b) Expert Report | |
| Allen, Theodore Dr. | 131 | Official sample ballot 11.06.12 Florida | Hearsay; Authenticity; Relevance; Foundation |
| Allen, Theodore Dr. | 132 | Official ballot Wake County, NC 11.02.10 | Hearsay; Authenticity; Foundation |
| Allen, Theodore Dr. | 133 | Sample ballot/Wake County, NC 11.06.12 | Hearsay; Authenticity; Foundation |
| Allen, Theodore Dr. | 134 | Journal of Law & Politics Summer 2013 | Hearsay |
| Allen, Theodore Dr. | 135 | Table 9/Distribution of Wait Times/NC | Foundation |
| Allen, Theodore Dr. | 136 | State Board Canvasses Primary, NC | Hearsay; Authenticity; Foundation |
| Burden, Barry | 1 | Expert Report of Barry C. Burden, Ph.D. | |
| Burden, Barry | 3 | Rebuttal Declaration of M.V. Hood, III | Hearsay, waived subject to conditions of Joint Stipulation |
| Burden, Barry | 4 | Expert Report of Barry C. Burden, Ph.D. | |
| Burden, Barry | 5 | Second Declaration of Sean P. Trende | Hearsay, waived subject to conditions of Joint Stipulation |
| Burden, Barry | 6 | Sur-Rebuttal Expert Report of Barry C. Burden, Ph.D. | |
| Clotfelter, Charles | 432 | Declaration of Charles Clotfelter, Ph.D. | |
| Clotfelter, Charles | 433 | Sur-Rebuttal Declaration of Charles Clotfelter, Ph.D. | |
| Fernandez, Jeffrey Ph.D. | 1 | Declaration of Dr. Fernandez | Hearsay, waived subject to conditions of Joint Stipulation |
| Fernandez, Jeffrey Ph.D. | 2 | Declaraton of Dr. Allen | |

| DEPONENT NAME | EXHIBIT NUMBER FROM DEPOSITION | DESCRIPTION | PLAINTIFFS' OBJECTIONS |
|--------------------------|--------------------------------|--|--|
| Fernandez, Jeffrey Ph.D. | 3 | Establishing a Statewide Maximum Wait Time | Hearsay; Authenticity; Foundation |
| Fernandez, Jeffrey Ph.D. | 4 | Article: Waiting to Vote | Hearsay; Authenticity; Foundation |
| Fernandez, Jeffrey Ph.D. | 5 | Article: Election Day Long Lines | Hearsay; Authenticity; Foundation |
| Gronke, Paul | 1 | Amended Rule 26(a)(2)(b) | |
| Gronke, Paul | 2 | Second Sur Reply Declaration | |
| Gronke, Paul | 3 | Rule 26(a)(2)(b) Expert Report and Declaration of Paul W. Gronke, Ph.D. | |
| Gronke, Paul | 4 | Second Declaration of Sean P. Trende | Hearsay, waived subject to conditions of Joint Stipulation |
| Gronke, Paul | 5 | Rule 26(a)(2)(b) Sur-Rebuttal Expert Report and Declaration of Paul W. Gronke, Ph.D. | |
| Hillygus, Sunshine | 373 | Report by Hillygus and Hulbein | |
| Hillygus, Sunshine | 374 | Making Young Voters: The Impact of Pre-registration | |
| Kousser, J. Morgan Ph.D. | 140 | When African-Americans Were Republicans in North Carolina | |
| Kousser, J. Morgan Ph.D. | 141 | Judgment and Memorandum of Decision in Dickson v Rucho | Relevance; Foundation; Hearsay |
| Kousser, J. Morgan Ph.D. | 142 | Thornburg v. Gingles | Relevance; Foundation; Hearsay |
| Lawson, Steven Ph.D. | 1 | Declaration of Steven Lawson Ph.D. - April 11, 2014 (filed 05.19.14) | |
| Lawson, Steven Ph.D. | 2 | Declaration of Steven Lawson | |
| Lawson, Steven Ph.D. | 3 | Voting Determination Letters for North Carolina | |
| Lawson, Steven Ph.D. | 4 | Senate Bill 767/S.L. 2000-136 | |
| Lawson, Steven Ph.D. | 5 | House Bill 831/S.L. 2001-319 | Foundation |
| Lawson, Steven Ph.D. | 6 | Senate Bill 1054/S.L. 2002-158 (=H1410) | Foundation |
| Lawson, Steven Ph.D. | 7 | Transcript of Session - November 24, 2003 House of Representatives | Foundation |
| Lawson, Steven Ph.D. | 8 | House Bill 91 S.L. 2007-253 (=S195) | Foundation |
| Lawson, Steven Ph.D. | 9 | Senate Bill 666 | Foundation |
| Lawson, Steven Ph.D. | 10 | Senate Bill 667 | Foundation |
| Lawson, Steven Ph.D. | 11 | NCGA Bill Inquiry Results (20015-2016 Session) | Foundation |
| Leloudis, James Ph.D. | 1 | Expert Report - April 11, 2014 | |
| Leloudis, James Ph.D. | 2 | Surrebuttal Expert Report - May 2, 2014 | |
| Leloudis, James Ph.D. | 3 | Expert Report - February 12, 2015 | |
| Levine, Peter | 1 | Expert Report - February 12, 2015 | |
| Levine, Peter | 2 | Surrebuttal Expert Report - March 24, 2015 | |
| Lichtman, Allan | 1 | Intentional Discrimination Against African Americans in the Adoption of North Carolina's Voter Information Verification Act, S.L. 2013-381 | |
| Lichtman, Allan | 2 | Response Report of Allan Lichtman to Declarations Submitted by Defendants | |
| Lichtman, Allan | 3 | The Impact of African Americans of North Carolina's Voter Information Verification Act, S.L. 2013-381 | |
| Lichtman, Allan | 4 | E-mail from Janet Thornton to Tom Farr regarding Registered Voters and VAP Figures | Hearsay; Not timely disclosed; Foundation |
| Lichtman, Allan | 5 | Second Declaration of Janet R. Thornton, Ph.D. | Hearsay, waived subject to conditions of Joint Stipulation |
| Minnite, Lorraine Ph.D. | 1 | Expert Report of Lorraine C. Minnite, Ph.D. 02.12.15 | |
| Stewart, Charles Ph.D. | 1 | Stewart rebuttal report | |
| Stewart, Charles Ph.D. | 2 | South Carolina voter registration application form | Foundation |

| DEPONENT NAME | EXHIBIT NUMBER FROM DEPOSITION | DESCRIPTION | PLAINTIFFS' OBJECTIONS |
|---|--------------------------------|--|--|
| Stewart, Charles Ph.D. | 3 | Stewart's 02.18.15 report | |
| Stewart, Charles Ph.D. | 4 | Stewart's 03.24.15 report | |
| Stewart, Charles Ph.D. | 5 | Ansolabehere report | Hearsay; Relevance; Foundation |
| Stewart, Charles Ph.D. | 6 | Addendum to Stewart's 02.12.15 report | |
| Stewart, Charles Ph.D. | 103 | Delcaration of Sean P. Trende | Hearsay, waived subject to conditions of Joint Stipulation |
| Stewart, Charles Ph.D. | 123 | Declaration of Janet R. Thornton, Ph.D. | Hearsay, waived subject to conditions of Joint Stipulation |
| Stewart, Charles Ph.D. | 124 | Declaration of Charles Stewart, III, Ph.D. | |
| Stewart, Charles Ph.D. | 126 | Surrebuttal of Charles Stewart, III, Ph.D. | |
| Stewart, Charles Ph.D. | 131 | Official Sample Ballot Miami-Dade | Hearsay, waived subject to conditions of Joint Stipulation |
| Stewart, Charles Ph.D. | 132 | Sample Ballot Wake County, NC 2010 | Hearsay, waived subject to conditions of Joint Stipulation |
| Stewart, Charles Ph.D. | 133 | Sample Ballot Wake County, NC 2012 | Hearsay, waived subject to conditions of Joint Stipulation |
| Stewart, Charles Ph.D. | 134 | Waiting to Vote in 2012, Stewart | Hearsay, waived subject to conditions of Joint Stipulation |
| Stewart, Charles Ph.D. | 137 | Exhibits to the Report of Charles Stewart, III, Ph.D. | |
| Stewart, Charles Ph.D. | 138 | Declaration of John Davis | Hearsay, waived subject to conditions of Joint Stipulation |
| Stewart, Charles Ph.D. | 139 | Declaration of Melvin Montford | |
| Summers, Kathryn Ph.D. | 1 | Declaration of Kathryn Summers, Ph.D. 02,11.15 | |
| Summers, Kathryn Ph.D. | 2 | Sur-rebuttal Declaration of Kathryn Summers, Ph.D. 03.24.15 | |
| Vernon-Feagans, Lynne Ph.D. | 1 | Declaration of Lynne Vernon-Feagans, Ph.D. 02.12.15 | |
| Vernon-Feagans, Lynne Ph.D. | 2 | Sur-Rebuttal Declaration of Lynne Vernon-Feagans, Ph.D. 03.24.15 | |
| Webster, Gerald Ph.D. | 1 | Webster's expert report | |
| Webster, Gerald Ph.D. | 2 | Webster's surrebuttal declaration | |
| Webster, Gerald Ph.D. | 3 | Appendix 1 to Webster's expert report | |
| EXHIBITS FROM DEFENDANTS' PRETRIAL DISCLOSURES | | | |
| | | All exhibits offered by Defendants during the Preliminary Injunction hearing | Foundation; Hearsay, waived subject to conditions of Joint Stipulation |
| | | State Board of Elections Report – Early Voting Comparison 2010 versus 2014 | Not timely disclosed; Foundation |
| | | Declaration of Kim Westbrook Strach dated September 2, 2014 and filed with the United States Court of Appeals for the Fourth Circuit | Hearsay; Relevance; Foundation |
| | | Affidavit of R. Erika Churchill dated June 4, 2015 and identified as Exhibit 520 in the Deposition of Erika Churchill | Foundation; Hearsay, waived subject to conditions of Joint Stipulation |
| | | May 2015: State Board of Elections Analysis of Mail Verification Failure Rates of SDR and Non-SDR Voters | Hearsay; Not timely disclosed, Foundation |
| | | Affidavit of Brian Neesby dated June 8, 2015 (except those portions related solely to the Plaintiffs' photo ID claims) | Hearsay; Not timely disclosed; Relevance (challenge to photo ID requirement deferred per 13-cv-861, ECF No. 282 ¶ 3); Foundation |

NAACP v. McCrory
Case Nos. 13-CV-658, -660, -861

ATTACHMENT 1: PLAINTIFFS' JOINT OBJECTIONS TO DEFENDANTS' DOCUMENTS AND EXHIBITS, INCLUDING SUMMARIES OF EVIDENCE, THAT DEFENDANTS EXPECT TO OFFER OR MAY OFFER AT TRIAL

| DEPONENT NAME | EXHIBIT NUMBER FROM DEPOSITION | DESCRIPTION | PLAINTIFFS' OBJECTIONS |
|---------------|--------------------------------|--|---|
| | | Declaration of Kim Westbrook Strach dated June 12, 2015 and attached Summary of Provisional Ballots in 2014 General Election | Hearsay; Not timely disclosed; Foundation |
| | | Affidavit of Janet R, Thornton, Ph.D. dated June 15, 2015 (except those portions related solely to the Plaintiffs' photo ID claims) | Hearsay; Not timely disclosed; Foundation |
| | | Data regarding individuals who were currently or formerly registered to vote, or attempted to register to vote, in North Carolina contained in the SEIMS database. | Not disclosed; Not an "identification of each document or other exhibit" as required by Rule 26(a)(3); Foundation |
| | | Data regarding individuals in the SADLS database | Not disclosed; Not an "identification of each document or other exhibit" as required by Rule 26(a)(3) |
| | | Data available on the FTP site of the North Carolina State Board of Elections located at ftp://alt.ncsbe.gov/. | Foundation |

General Information

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| Court | United States District Court for the Middle District of North Carolina; United States District Court for the Middle District of North Carolina |
| Federal Nature of Suit | Civil Rights - Voting[441] |
| Docket Number | 1:13-cv-00660 |