

Exhibit B

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

NORTH CAROLINA STATE CONFERENCE OF)
THE NAACP, EMMANUEL BAPTIST CHURCH,)
NEW OXLEY HILL BAPTIST CHURCH,)
BETHEL A. BAPTIST CHURCH, COVENANT)
PRESBYTERIAN CHURCH, CLINTON)
TABERNACLE AME ZION CHURCH,)
BARBEE’S CHAPEL MISSIONARY BAPTIST)
CHURCH, INC., ROSANELL EATON,)
ARMENTA EATON, CAROLYN COLEMAN,)
BAHEEYAH MADANY, JOCELYN FERGUSON-)
KELLY, FAITH JACKSON, and MARY PERRY,)

Plaintiffs,)

v.)

Case No.: 1:13-CV-658

PATRICK LLOYD MCCRORY, in his official)
capacity as the Governor of North Carolina, KIM)
WESTBROOK STRACH, in her official capacity as)
Executive Director of the North Carolina State)
Board of Elections, JOSHUA B. HOWARD, in his)
official capacity as Chairman of the North Carolina)
State Board of Elections, RHONDA K. AMOROSO,)
in her official capacity as Secretary of the North)
Carolina State Board of Elections, JOSHUA D.)
MALCOLM, in his official capacity as a member of)
the North Carolina State Board of Elections, PAUL)
J. FOLEY, in his official capacity as a member of)
the North Carolina State Board of Elections and)
MAJA KRICKER, in her official capacity as a)
member of the North Carolina State Board of)
Elections,)

Defendants.

LEAGUE OF WOMEN VOTERS OF
NORTH CAROLINA, A. PHILIP
RANDOLPH INSTITUTE, UNIFOUR
ONESTOP COLLABORATIVE,
COMMON CAUSE NORTH CAROLINA,
GOLDIE WELLS, KAY BRANDON,
OCTAVIA RAINEY, SARA STOHLER,
and HUGH STOHLER,

Plaintiffs,

v.

THE STATE OF NORTH CAROLINA, JOSHUA
B. HOWARD in his official capacity as a member of
the State Board of Elections, RHONDA K.
AMOROSO in her official capacity as a member of
the State Board of Elections, JOSHUA D.
MALCOLM in his official capacity as a member of
the State Board of Elections, PAUL J. FOLEY in his
official capacity as a member of the State Board of
Elections, MAJA KRICKER in her official capacity
as a member of the State Board of Elections, and
PATRICK LLOYD MCCRORY, in his official
capacity as the Governor of North Carolina,

Defendants.

Case No.: 1:13-CV-660

**PLAINTIFFS' JOINT FIRST SET OF REQUESTS FOR PRODUCTION TO
DEFENDANTS MEMBERS OF THE NORTH CAROLINA STATE BOARD OF
ELECTIONS**

Pursuant to Rules 26 and 34 of the Federal Rules of Civil Procedure, the North Carolina NAACP, et al., and the League of Women Voters, et al., (collectively, the "Plaintiffs") jointly submit their first set of requests for the production of documents to Kim Westbrook Strach, in her official capacity as Executive Director of the North Carolina State Board of Elections; Joshua B. Howard, in his official capacity as Chairman of the North Carolina State Board of Elections; Rhonda K. Amoroso, in her official capacity as Secretary of the North Carolina State Board of

Elections; Joshua D. Malcolm, in his official capacity as a member of the North Carolina State Board of Elections; Paul J. Foley, in his official capacity as a member of the North Carolina State Board of Elections; and Maja Krickler, in her official capacity as a member of the North Carolina State Board of Elections (collectively, “Defendants”). In accordance with Rule 34, Defendants shall respond to these requests for production and shall produce the documents requested. Responses are to be served to the *NAACP* Plaintiff are to be served to Tin Fulton Walker & Owen, PLLC, 312 West Franklin Street, Chapel Hill, North Carolina 27516, to the attention of Adam Stein, and are due within thirty days of service of these requests for production. Responses to the *League of Women Voters* Plaintiffs are to be served to American Civil Liberties Union, 125 Broad St., 18th Fl., New York, NY 10004, to the attention of Dale Ho, and are due within thirty days of service of these requests for production. Each document request is subject to the Instructions and Definitions preceding the specific requests.

INSTRUCTIONS

1. If Defendants object to any part of a request, set forth the basis for your objection and respond to all parts of the request to which you do not object.
2. If any privilege is claimed as a ground for not producing a document or tangible thing, provide a description of the basis of the claimed privilege and all information necessary for the Plaintiffs to assess the claim of privilege.
3. In responding to these document requests, produce all documents available to Defendants or subject to your reasonable access or control. Documents requested are those in the actual or constructive possession or control of the Defendants, your attorneys, investigators, experts, and anyone else acting on the Defendants’ behalf.
4. Documents are to be produced as they are kept in the ordinary course of business.

5. Each request seeks the requested documents in their entirety, without abbreviation, redaction, or expurgation, including all attachments or other matters affixed to them.

6. If any otherwise responsive document was, but is no longer, in existence or in Defendants' possession, custody, or control, identify the type of information contained in the document, its current or last known custodian, the location/address of such document, and the identity of all persons having knowledge or who had knowledge of the document, and also describe in full the circumstances surrounding its disposition from Defendants' possession or control.

7. All responsive documents in existence as of the date of production are to be produced. Any documents created or obtained after that date are to be produced under Defendants' continuing obligation to supplement its production immediately upon the creation or development of additional responsive documents.

8. The singular form of a noun or pronoun includes the plural form, and the plural form includes the singular.

9. The connectives "and" and "or" shall be construed either disjunctively or conjunctively as necessary to bring within the scope of a request all responses that otherwise might be construed to be outside of its scope.

10. The relevant time period for these requests runs through the present, unless otherwise stated.

11. These document requests are continuing in nature, up to and during the course of any hearing in this proceeding. Documents and tangible things sought by these requests that

Defendants obtain after Defendants serve Defendants answers must be produced to counsel for the Plaintiffs by supplementary answers or productions.

12. All documents are to be produced in electronic form. To the extent documents can be accurately represented in black and white, they should be produced in single page Tagged Image File Format (TIFF), together with any related field-delimited loadfiles (e.g. Concordance DAT, CSV, OPT, LOG). The following fields should be included in the loadfiles: begin Bates number; end Bates number; begin Attachment Bates number; end Attachment Bates number; custodian; date sent (for e-mail messages); date modified (for email and non-email messages where information is available); date created (for email and non-email messages where information is available); author (for email and non-email messages); to (for email messages); from (for email messages); cc (for email messages); bcc (for email messages); subject (for email messages); filename (for electronically collected files); filepathway (for electronically collected files). All images should be endorsed with a unique Bates number as well as appropriate confidentiality designation. The Bates number should consist of a prefix which can be used to identify the producing party and a page number. These endorsements should not obstruct any portion of the text in the image. All spreadsheet and presentation files, such as Excel and PowerPoint files, should be provided in native format with a link to the native file in the loadfile.

DEFINITIONS

1. “Absentee ballot” shall mean a paper ballot issued by mail to a voter who is unable to attend a polling place in person on Election Day or during One-Stop Early Voting.
2. “Communication” means any transfer of information of any type, whether written, oral, electronic, or otherwise.

3. “Complaint” shall mean the First Amended Complaint filed by Plaintiffs in the above-captioned action.

4. “Defendants” means Kim Westbrook Strach, in her official capacity as Executive Director of the North Carolina State Board of Elections; Joshua B. Howard, in his official capacity as Chairman of the North Carolina State Board of Elections; Rhonda K. Amoroso, in her official capacity as Secretary of the North Carolina State Board of Elections; Joshua D. Malcolm, in his official capacity as a member of the North Carolina State Board of Elections; Paul J. Foley, in his official capacity as a member of the North Carolina State Board of Elections; and Maja Kricker, in her official capacity as a member of the North Carolina State Board of Elections. “Defendants” also shall include all of your employees, agents, or representatives, its counsel, and all employees, agents, or representatives of counsel. “Defendants” shall further include all predecessors in interest, parents, subsidiaries, partners, joint ventures, or other corporate affiliates of the North Carolina State Board of Elections, and all of their employees, agents, or representatives, their counsel, and all employees, agents, or representatives of counsel.

5. “Document” means the complete original or a true, correct and complete copy and any non-identical copies of any written or graphic manner, no matter how produced, recorded, stored or reproduced, including, but not limited to, any writing, letter, envelope, telegram, electronic mail, computer file, meeting minute, memorandum, statement, book, record, survey, map, study, handwritten note, working paper, chart, tabulation, graph, tape, data sheet, data processing card, database, printout, microfilm, index, appointment book, diary, diary entry, calendar, calendar entry, desk pad, telephone message slip, note of interview or communication or any other data compilation in Defendants’ possession, custody or control, including all drafts

of all such documents, and all documents Defendants have provided to Defendants' counsel. Defendants are requested to produce all drafts and notes, whether typed, handwritten, or otherwise, made or prepared in connection with such documents, whether or not used.

6. "Early Voting" shall mean one-stop voting whereby a registered voter goes to their county board of elections or an alternative location to vote prior to Election Day as provided for in N.C. Gen. Stat. § 163-227.2.

7. "In-person voter fraud" shall mean attempted fraudulent voting by means of a person claiming to be someone else in order to vote at a polling place in person on Election Day.

8. "NCDOT" shall mean the North Carolina Department of Transportation, including the Division of Motor Vehicles.

9. "H.B. 589" shall refer to Session Law 2013-381/House Bill 589 ratified by the General Assembly on July 26, 2013 and signed into law by the Governor on August 12, 2013.

10. "Photo identification" shall mean a photo identification card that meets the requirements to vote under H.B. 589.

11. "Registered voter" shall mean all persons currently registered to vote in the State of North Carolina's database and all persons who may properly register to vote by the close of discovery in this case.

12. "Relating to" as used herein means concerning, referring to, reflecting, regarding, describing, evidencing, or constituting.

13. "Same-Day Registration" shall mean in-person voter registration on Election Day or during one-stop voting.

REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1:

All documents and communications relating to the implementation of H.B. 589, or plans for implementation of H.B. 589, including but not limited to training materials, guidance documents, and other instructions issued by Defendants or others to agencies, employees, or agents of the State of North Carolina.

REQUEST FOR PRODUCTION NO. 2:

All documents and communications related to any incident of in-person voter fraud from 1995 to the present, including but not limited to documents and communications related to the reporting, investigation, or prosecution of any instance in-person voter fraud.

REQUEST FOR PRODUCTION NO. 3:

All documents and communications relating to the procedures and budget for identifying or detecting in-person voter fraud.

REQUEST FOR PRODUCTION NO. 4:

All documents and communications related to any incident of voter fraud involving absentee ballots from 1995 to the present, including but not limited to documents and communications related to the reporting, investigation, or prosecution of any instance voter fraud involving absentee ballots.

REQUEST FOR PRODUCTION NO. 5:

All documents and communications related to any incident of voter fraud involving Same Day Registration and standard (non-Same Day) registration from 1995 to the present, including but not limited to documents and communications related to the reporting, investigation, or

prosecution of any instance voter fraud involving same day registration.

REQUEST FOR PRODUCTION NO. 6:

All documents and communications relating to any any reports, studies, estimates, or analyses comparing the rate of return of verifiable mailings following voters' use of same-day registration with the rate of return of verifiable mailings following voters' use of traditional, non-same-day Registration

REQUEST FOR PRODUCTION NO. 7:

All documents and communications relating to the procedures and budget for identifying or detecting voter fraud involving absentee ballots.

REQUEST FOR PRODUCTION NO. 8:

All documents and communications relating to the process for obtaining the photo identification required to vote as set forth in H.B. 589.

REQUEST FOR PRODUCTION NO. 9:

All documents and communications relating to reports, communications, lobbying and testimony issued by the State Board of Elections concerning proposed, debated, and/or enacted voting legislation during the 2013 session of the General Assembly.

REQUEST FOR PRODUCTION NO. 10:

All documents and communications relating to any reports, studies, estimates, or analyses concerning any voting legislation proposed, debated, or enacted during the 2013 session of the North Carolina General Assembly.

REQUEST FOR PRODUCTION NO. 11:

All documents and communications relating to proposed election reforms or changes to the rules, procedures, or practices for early voting, voter identification, same-day registration, out-of-precinct voting, voter challenges pursuant to G.S. §§ 163-84 and 163-87, pre-registration for 16 and 17 year olds, or the process of reviewing and counting provisional ballots.

REQUEST FOR PRODUCTION NO. 12:

All documents and communications referring or relating to any estimate, report, study, or analysis of the number of registered voters who do not have one or more of the forms of photo identification acceptable to vote under H.B. 589.

REQUEST FOR PRODUCTION NO. 13:

All documents and communications referring or relating to estimates, reports, studies, or analyses of the cost to voters to secure documents required to obtain photo identification under H.B. 589.

REQUEST FOR PRODUCTION NO. 14:

All documents and communications referring or relating to a comparison of the State of North Carolina's registered voter database with NCDOT records, including but not limited to any such documents that provide a subset of registered voters who do not have NCDOT issued ID.

REQUEST FOR PRODUCTION NO. 15:

All documents and communications referring or relating to any estimate, report, study, or analysis of H.B. 589's impact on future elections, including the impact of H.B. 589 on voter turnout, early voting, or potential increased waiting times at polls.

REQUEST FOR PRODUCTION NO. 16:

All documents and communications relating to the cost or expense of administering local, state, and federal elections in North Carolina in each future election year from 2014 forward.

REQUEST FOR PRODUCTION NO. 17:

All documents and communications relating to the costs or expense of administering local, state, and federal elections in North Carolina in each election year from 2000 to the 2013.

REQUEST FOR PRODUCTION NO. 18:

The North Carolina “Voter File,” including the file of all registered voters in the State including full name, address, and date of birth, provided in a reasonably accessible, searchable, and sortable electronic format (including Excel or other database-compatible format but not including paper or portable document format (.pdf)).

REQUEST FOR PRODUCTION NO. 19:

All documents and communications related to the number of voters who participated in same-day registration since 2007, including the precinct, race, ethnicity, age, gender, and any other identifying voter information.

REQUEST FOR PRODUCTION NO. 20:

All documents and communications related to the number of voters who voted on each individual day of the early voting period since 2000, including the precinct, race, ethnicity, age, gender, and any other identifying voter information.

REQUEST FOR PRODUCTION NO. 21:

All documents and communications related to the acceptance rate of provisional ballots since 2000, including but not limited to documents sufficient to show the reasons provisional

ballots were cast, accepted or rejected.

REQUEST FOR PRODUCTION NO. 22:

All documents and communications relating to training provided to pollworkers on the casting of provisional ballots by out-of-precinct voters since 2008, including documents and communications relating to training that may be provided pollworkers in 2014.

REQUEST FOR PRODUCTION NO. 23:

All documents and communications related to the use of out-of-precinct voting since 2000, including the precinct, race, age, gender, and any other identifying information of voters who participated in out-of-precinct voting.

REQUEST FOR PRODUCTION NO. 24:

All documents and communications related to the number of ballots challenged by poll observers since 2000, including precinct locations for each challenge and whether or not the challenges were ultimately determined to be valid.

REQUEST FOR PRODUCTION NO. 25:

All documents and communications related to voters who were challenged on Election Day or before Election Day pursuant to G.S. §§ 163-84 and 163-87, respectively, since 2000, including the reason for each challenge; whether reported to you by a local board or otherwise brought to your attention, easily obtainable by you from a local board, or the subject of an appeal to you.

REQUEST FOR PRODUCTION NO. 26:

All documents and communications related to the individuals or organizations that have challenged voters pursuant to G.S. §§ 163-84 and 163-87 since 2000, including the reasons for

each challenge; whether reported to you by a local board or otherwise brought to your attention, easily obtainable by you from a local board, or the subject of an appeal to you.

REQUEST FOR PRODUCTION NO. 27:

All documents and communications related to the number of pollworkers, by county, employed during the early voting period and on Election Day for the last five years.

REQUEST FOR PRODUCTION NO. 28:

All documents and communications relating to any data tracking, recording, or study of voting patterns by race.

REQUEST FOR PRODUCTION NO. 29:

All documents and communications related to the number of voting jurisdictions that extended voting to 5 p.m. on the Saturday before election during 2004, 2006, 2008, 2010, and 2012.

REQUEST FOR PRODUCTION NO. 30:

All documents and communications relating to the average waiting time of voters during the 2006, 2008, 2010, and 2012 elections.

REQUEST FOR PRODUCTION NO. 31:

All documents and communications relating to complaints or instances of long lines or waiting times during early voting and Election Day in any county in the state during the 2006, 2008, 2010, and 2012 elections.

REQUEST FOR PRODUCTION NO. 32:

All documents and communications relating to the number of county boards of elections

that have requested to decrease the cumulative number of hours for early voting, and the number of such requests that have been granted.

REQUEST FOR PRODUCTION NO. 33:

All documents and communications provided by the State Board of Elections to local and county boards of elections relating to the calculation and maintenance of aggregate number of early voting hours in the 2010 general election for the 2014 general election under G.S. §§ 163-227.2(g2).

REQUEST FOR PRODUCTION NO. 34:

All documents and communications relating to the aggregate number of hours, as calculated under G.S. §§ 163-227.2(g2), for the May 2010 primary elections for each county in the state.

REQUEST FOR PRODUCTION NO. 35:

All documents and communications relating to the number of polling places open on Election Day in the May 2010 primary elections, including the hours that each polling place was open, in each county in the state.

REQUEST FOR PRODUCTION NO. 36:

All documents and communications related to the counties and precincts that conducted early voting on any Sunday that fell within the early voting period permitted under North Carolina law for each election from 2008 to the present.

REQUEST FOR PRODUCTION NO. 37:

All documents and communications relating to each county's early voting plan for the May 2014 primaries, including the number of sites open and the number of hours each site will

be open during early voting.

REQUEST FOR PRODUCTION NO. 38:

All documents and communications relating to the number of polling places that will be open for the May 2014 primaries, including the hours that each polling place will be open, in each county in the state.

REQUEST FOR PRODUCTION NO. 39:

All documents and communications sufficient to identify, from each election from 2000 to present, the rates by precinct of straight ticket voting.

REQUEST FOR PRODUCTION NO. 40:

All documents and communications referring or relating to any estimate, report, study, or analysis regarding straight ticket voting in North Carolina from 2000 to the present.

REQUEST FOR PRODUCTION NO. 41:

All documents and communications sufficient to identify, for each election from 2008 to the present, number of people between the age of 16-18 who pre-registered to vote, including the race, age, gender, and any other identifying information of voters who pre-registered to vote.

REQUEST FOR PRODUCTION NO. 42:

All documents and communications relating to Defendants' plans and efforts to educate citizens of North Carolina as to the provisions of H.B. 589.

REQUEST FOR PRODUCTION NO. 43:

All documents and communications relating to information Defendants prepared or provided for use in a submission to the Department of Justice pursuant to Section 5 of the Voting

Rights Act from 2000 to the present.

REQUEST FOR PRODUCTION NO. 44:

Any document retention policies that were in effect at the State Board of Elections from 2012 to the present concerning the preservation of public records.

REQUEST FOR PRODUCTION NO. 45:

Any litigation hold notices issued to the State Board of Elections, or its representatives, in connection with the above captioned cases, *North Carolina State Conference of the NAACP, et al. v. McCrory, et al.* and *League of Women Voters of N.C., et al. v. North Carolina.*

REQUEST FOR PRODUCTION NO. 46:

All documents and communications relating to the claims and defenses you have raised or intend to raise in response to the Complaint, including all communications and/or documents on which you intend to rely on at trial or otherwise in this case.

REQUEST FOR PRODUCTION NO. 47:

All documents and communications relating to financial data, budgets, or monetary effects of House Bill 589, prepared by any State Board of Elections official or staff member.

REQUEST FOR PRODUCTION NO. 48:

All documents and communications relating to financial data, budgets, or monetary effects of House Bill 589, sent or presented to any State Board of Elections official or staff member by any person or entity.

Dated: January 24, 2014

Respectfully submitted,

Penda D. Hair
Edward A. Hailes, Jr.
Denise D. Lieberman
Donita Judge
Caitlin Swain
ADVANCEMENT PROJECT
Suite 850
1220 L Street, N.W.
Washington, DC 20005
Phone: (202) 728-9557
phair@advancementproject.com

Irving Joyner (N.C. State Bar # 7830)
P.O. Box 374
Cary, NC 27512
Phone: (919)319-353
ijoyner@ncu.edu

By: /s/ Adam Stein

Adam Stein (N.C. State Bar # 4145)
Of Counsel
TIN FULTON WALKER & OWEN, PLLC
312 West Franklin Street
Chapel Hill, NC 27516
Phone: (919) 240-7089
astein@tinfulton.com

Thomas D. Yannucci
Daniel T. Donovan
Susan M. Davies
K. Winn Allen
Uzoma Nkwonta
Kim Knudson
Anne Dechter
Jodi Wu
KIRKLAND & ELLIS LLP
655 Fifteenth St., N.W.
Washington, DC 20005
Phone: (202) 879-5000
tyannucci@kirkland.com

Attorneys for Plaintiffs in North Carolina Conference of NAACP, et al. v. McCrory, et al.

Dated: December 2, 2013

Respectfully submitted,

Laughlin McDonald*
ACLU Voting Rights Project
2700 International Tower
229 Peachtree Street, NE
Atlanta, GA 30303
(404) 500-1235
lmcdonald@aclu.org
* *appearing pursuant to Local Rule 83.1(d)*

Christopher Brook (State Bar #33838)
ACLU of North Carolina Legal
Foundation
P.O. Box 28004
Raleigh, NC 27611-8004
Telephone: 919-834-3466
Facsimile: 866-511-1344
E-mail: cbrook@acluofnc.org

By: /s/ Anita S. Earls

Anita S. Earls (State Bar # 15597)
Allison J. Riggs (State Bar # 40028)
Clare R. Barnett (State Bar #42678)
Southern Coalition for Social Justice
1415 Highway 54, Suite 101
Durham, NC 27707
Telephone: 919-323-3380 ext. 115
Facsimile: 919-323-3942
E-mail: anita@southerncoalition.org

Dale Ho*
Julie A. Ebenstein*
ACLU Voting Rights Project
125 Broad Street
New York, NY 10004
(212) 549-2693
dale.ho@aclu.org
**appearing pursuant to Local Rule 83.1(d)*

Attorneys for Plaintiffs in League of Women Voters of North Carolina, et al. v. North Carolina, et al.

CERTIFICATE OF SERVICE

I, Daniel T. Donovan, hereby certify that on **December 2, 2013**, I served Plaintiffs' **First Set of Requests for Production to Defendants Members of the North Carolina State Board of Elections** via email and Fed Ex to all named parties below:

Adam Stein, Esq.
Tin Fulton Walker & Owen, PLLC
312 West Franklin Street
Chapel Hill, NC 27516
Telephone: (919) 240-7089
Facsimile: (919) 240-7822
Email: astein@tinfulton.com
Attorney for Plaintiffs

Karl S. Bowers, Jr.
Bowers Law Office LLC
P.O. Box 50549
Columbia, SC 29250
Telephone: (803) 260-4124
Facsimile: (803) 250-3985
Email: butch@butchbowers.com
Attorney for Governor Patrick L. McCrory

Penda D. Hair
Advancement Project
Suite 850
1220 L Street, N.W.
Washington, DC 20005
Email: phair@advancementproject.com
Attorney for Plaintiffs

Robert C. Stephens
General Counsel
Office of the Governor of North Carolina
20301 Mail Service Center
Raleigh, North Carolina 27699
Telephone: (919) 814-2027
Facsimile: (919) 733-2120
Email: bob.stephens@nc.gov
Of Counsel

Daniel T. Donovan, Esq.
Kirkland & Ellis LLP
655 Fifteenth St., N.W.
Washington, DC 20005
Telephone: (202) 879-5174
Facsimile: (202) 879-5200
Email: daniel.donovan@kirkland.com
Attorney for Plaintiffs

Alexander Peters, Esq.
NC Department of Justice
PO Box 629
Raleigh, NC 27602
Telephone: (919) 716-6913
Facsimile: (919) 716-6763
Email: apeters@ncdoj.gov
Attorney for Defendants Strach, Howard, Amoroso, Malcolm, Foley, & Kricker

Irving Joyner, Esq.
PO Box 374
Cary, NC 27512
Email: ijoyner@ncsu.edu

Thomas A. Farr, Esq.
Phillip J. Strach, Esq.
Ogletree, Deakins, Nash Smoak & Stewart, P.C
4208 Six Forks Road
Raleigh, NC 27609
Telephone: (919) 787-9700
Facsimile: (919)783-9412
Email: thomas.farr@ogletreedeakins.com
Email: phil.strach@ogletreedeakins.com
Attorneys for Defendants Strach, Howard, Amoroso, Malcolm, Foley, & Kricker

Respectfully Submitted,

/s/ Daniel T. Donovan

Daniel T. Donovan, Esq.
Kirkland & Ellis LLP
655 Fifteenth St., N.W.
Washington, DC 20005
Telephone: (202) 879-5174
Facsimile: (202) 879-5200
daniel.donovan@kirkland.com

/s/ Adam Stein

Adam Stein (N.C. State Bar #4145)
TIN FULTON WALKER & OWEN, PLLC
312 West Franklin Street
Chapel Hill, NC 27516
Telephone: (919) 240-7089
astein@tinfulton.com

/s/ Anita S. Earls

Anita S. Earls (State Bar # 15597)
Allison J. Riggs (State Bar # 40028)
Clare R. Barnett (State Bar #42678)
Southern Coalition for Social Justice
1415 Highway 54, Suite 101
Durham, NC 27707
Telephone: 919-323-3380 ext. 115
Facsimile: 919-323-3942
E-mail: anita@southerncoalition.org