

Exhibit C

**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.)

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.

Case No.: 1:13-CV-658

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.

Case No.: 1:13-CV-660

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.

**DEFENDANT PATRICK LLOYD MCCRORY'S OBJECTIONS AND RESPONSES TO
PLAINTIFFS' JOINT FIRST SET OF REQUESTS FOR PRODUCTION**

GENERAL OBJECTIONS

Defendant PATRICK LLOYD MCCRORY, in his official capacity as the Governor of North Carolina, objects to this First Set of Requests for Production of Documents ("Discovery Requests") to the extent that they seek information protected from discovery as trial preparation materials or by the attorney work product, attorney/client communication, or any other applicable privilege, including but not limited to executive privilege, the deliberative process, legislative

immunity, legislative privilege, and legislative confidentiality. Defendant also objects to these Discovery Requests to the extent that they seek the identity of persons, including lawyers, who received documents in preparation of litigation and to the extent that they seek the identities of outside persons, including counsel, retained by defendants in connection with claims that are directly or indirectly related to the subject matter of this action.

Defendant's answers identify persons and documents based on Defendant's current knowledge and belief, subject to general and specific objections set forth herein. Defendant's ongoing investigation may hereafter determine the identities of additional persons or documents with knowledge of the matters inquired about.

Defendant's answers identify solely those persons currently believed to have direct knowledge of matters of which the Discovery Requests inquire. Defendant objects to the Discovery Requests to the extent, if any, that they seek identification of persons not having direct personal knowledge on the grounds that requesting such information is unduly burdensome.

Defendant objects to any instructions that exceed what is required by the Federal Rules of Civil Procedure.

Defendant objects to the Discovery Requests to the extent that they seek information not directly related to the matters at issue in this action on the grounds that the Discovery Requests are overly broad, unduly burdensome, and exceed the scope of discovery permissible under Rule 26(b) of the Federal Rules of Civil Procedure because the information sought is not admissible evidence and is not reasonably calculated to lead to the discovery of admissible evidence.

Defendant objects to the Discovery Requests to the extent that they seek information to which Defendant has no direct knowledge and which is otherwise obtainable from the direct knowledge of other individuals.

Defendant objects to the Discovery Requests to the extent they seek information outside of the relevant time frame. In particular, Defendant objects to requests that seek information for a time period that exceeds a reasonable time period on the grounds that such information is not relevant or likely to lead to the discovery of admissible evidence, and is unduly burdensome and harassing. Moreover, Defendant objects to requests that seek information after August 12, 2013, the date on which SL 2013-581 was formally enacted, on the grounds that such information is not relevant or likely to lead to the discovery of admissible evidence, and is unduly burdensome and harassing.

Defendant objects to preparing a privilege log for the following categories of documents: (1) documents created by or exchanged between counsel for the parties in this litigation; (2) documents exchanged between counsel for the parties and their respective clients once the litigation was initiated (August 12, 2013); and (3) documents created by or exchanged between legislators and their staff at any time which are shielded from disclosure by established doctrines of legislative immunity, privilege, and confidentiality. Defendant's objection is for the same reasons outlined in Defendants' Brief in Support of Motion Regarding Order on Electronically Stored Documents, filed January 2, 2014. Defendant objects to preparing a privilege log for communications other than those listed above at the current time because, as of the date of the instant objections and responses, the parties have not yet agreed on search terms or custodians of electronic information from whom electronically stored information should be produced.

Although these general objections may not be expressly restated in each response, these general objections are incorporated by reference as if fully set forth in connection with each response.

RESPONSES TO REQUESTS FOR PRODUCTION

REQUEST FOR PRODUCTION NO. 1:

All documents and communications received or created by the Office of the Governor that reflect or discuss the rationale or purpose for enacting any provision in H.B. 589 or signing H.B. 589 (or similar provisions proposed previously) into law.

RESPONSE:

Defendant objects to this Document Request on the grounds that:

- (a) it seeks post-enactment information that is not relevant nor reasonably calculated to lead to the discovery of admissible evidence; and
- (b) to the extent that it seeks information protected by the attorney-client privilege, work product doctrine, legislative immunity or privilege, or legislative confidentiality.

REQUEST FOR PRODUCTION NO. 2:

All documents and communications concerning any instructions issued to or actions by the Office of the Governor or others to require state agencies to take steps to implement the provisions of H.B. 589.

RESPONSE:

Defendant objects to this Document Request on the grounds that:

- (a) it seeks pre-enactment information that exceeds a reasonable time frame and is therefore not relevant nor reasonably calculated to lead to the discovery of admissible evidence;
- (b) to the extent that it seeks information protected by the attorney-client privilege, work product doctrine, legislative immunity or privilege, or legislative confidentiality; and
- (c) it seeks documents in the possession, custody, or control of persons other than this

defendant.

REQUEST FOR PRODUCTION NO. 3:

All documents and communications received or created by the Office of the Governor related to the incidence of in-person voter fraud in North Carolina from 1995 to the present.

RESPONSE:

Defendant objects to this Document Request on the grounds that:

- (a) it seeks pre-enactment information that exceeds a reasonable time frame and is therefore not relevant nor reasonably calculated to lead to the discovery of admissible evidence;
- (b) to the extent that it seeks information protected by the attorney-client privilege, work product doctrine, legislative immunity or privilege, or legislative confidentiality;
- (c) the phrase “in-person voter fraud” is vague and ambiguous; and
- (d) it seeks documents in the possession, custody, or control of persons other than this defendant.

REQUEST FOR PRODUCTION NO. 4:

All documents and communications received or created by the Office of the Governor relating to the procedures and budget for identifying or detecting in-person voter fraud.

RESPONSE:

Defendant objects to this Document Request on the grounds that:

- (a) it seeks pre-enactment information that exceeds a reasonable time frame and is therefore not relevant nor reasonably calculated to lead to the discovery of admissible evidence;
- (b) to the extent that it seeks information protected by the attorney-client privilege, work product doctrine, legislative immunity or privilege, or legislative confidentiality;
- (c) the phrases “in-person voter fraud” and “procedures and budget” are vague and ambiguous; and
- (d) it seeks documents in the possession, custody, or control of persons other than

this defendant.

REQUEST FOR PRODUCTION NO. 5:

All documents and communications received or created by the Office of the Governor related to any incident of voter fraud involving absentee ballots in North Carolina from 1995 to the present.

RESPONSE:

Defendant objects to this Document Request on the grounds that:

- (a) it seeks pre-enactment information that exceeds a reasonable time frame and is therefore not relevant nor reasonably calculated to lead to the discovery of admissible evidence;
- (b) to the extent that it seeks information protected by the attorney-client privilege, work product doctrine, legislative immunity or privilege, or legislative confidentiality;
- (c) it seeks documents in the possession, custody, or control of persons other than this defendant.

REQUEST FOR PRODUCTION NO. 6:

All documents and communications received or created by the Office of the Governor relating to the procedures and budget for identifying or detecting voter fraud involving absentee ballots.

RESPONSE:

Defendant objects to this Document Request on the grounds that:

- (a) it seeks pre-enactment information that exceeds a reasonable time frame and is therefore not relevant nor reasonably calculated to lead to the discovery of admissible evidence;
- (b) to the extent that it seeks information protected by the attorney-client privilege, work product doctrine, legislative immunity or privilege, or legislative confidentiality; and

- (c) the phrase “procedures and budget” is vague and ambiguous.

REQUEST FOR PRODUCTION NO. 7:

All documents and communications relating to the Office of the Governor’s consideration, evaluation, or review of the process for obtaining the photo identification required to vote as set forth in H.B. 589.

RESPONSE:

Defendant objects to this Document Request on the grounds that:

- (a) it seeks pre-enactment and post-enactment information that exceeds a reasonable time frame and is therefore not relevant nor reasonably calculated to lead to the discovery of admissible evidence; and
- (b) to the extent that it seeks information protected by the attorney-client privilege, work product doctrine, legislative immunity or privilege, or legislative confidentiality.

REQUEST FOR PRODUCTION NO. 8:

All documents and communications relating to the Office of the Governor’s consideration, evaluation, or review of reports issued by the State Board of Elections concerning proposed, debated or enacted voting legislation during the 2013 session of the North Carolina General Assembly.

RESPONSE:

Defendant objects to this Document Request on the grounds that:

- (a) it seeks information that is not relevant nor reasonably calculated to lead to the discovery of admissible evidence;
- (b) to the extent that it seeks information protected by the attorney-client privilege, work product doctrine, legislative immunity or privilege, or legislative confidentiality; and
- (c) the phrase “voting legislation” is vague and ambiguous.

REQUEST FOR PRODUCTION NO.9:

All documents and communications relating to the Office of the Governor's appointments to the NCDOT, including the DMV, from 2012 to the present.

RESPONSE:

Defendant objects to this Document Request on the grounds that:

- (a) it seeks information that is not relevant nor reasonably calculated to lead to the discovery of admissible evidence;
- (b) to the extent that it seeks information protected by the attorney-client privilege, work product doctrine, legislative immunity or privilege, or legislative confidentiality; and
- (c) it seeks information that is either already known or is in the possession of the Plaintiffs or is otherwise publicly available to the Plaintiffs.

REQUEST FOR PRODUCTION NO. 10:

All documents and communications relating to the Office of the Governor's appointments to the State Board of Elections, from 2012 to the present.

RESPONSE:

Defendant objects to this Document Request on the grounds that:

- (a) it seeks information that is not relevant nor reasonably calculated to lead to the discovery of admissible evidence;
- (b) to the extent that it seeks information protected by the attorney-client privilege, work product doctrine, legislative immunity or privilege, or legislative confidentiality; and
- (c) it seeks information that is either already known or is in the possession of the Plaintiffs or is otherwise publicly available to the Plaintiffs.

REQUEST FOR PRODUCTION NO. 11:

All documents and communications between the Office of the Governor and the NCDOT, including the DMV, regarding the prospective impact or implementation of proposed, debated, or enacted voting legislation during the 2013 session of the North Carolina General Assembly.

RESPONSE:

Defendant objects to this Document Request on the grounds that:

- (a) it seeks information that is not relevant nor reasonably calculated to lead to the discovery of admissible evidence;
- (b) to the extent that it seeks information protected by the attorney-client privilege, work product doctrine, legislative immunity or privilege, or legislative confidentiality; and
- (c) the phrases “voting legislation” and “prospective impact” are vague and ambiguous.

REQUEST FOR PRODUCTION NO. 12:

All communications between the Office of the Governor and any state and local election officials regarding the prospective impact or implementation of proposed, debated, or enacted voting legislation during the 2013 session of the North Carolina General Assembly.

RESPONSE:

Defendant objects to this Document Request on the grounds that:

- (a) it seeks information that is not relevant nor reasonably calculated to lead to the discovery of admissible evidence;
- (b) to the extent that it seeks information protected by the attorney-client privilege, work product doctrine, legislative immunity or privilege, or legislative confidentiality; and
- (c) the phrases “voting legislation” and “prospective impact” are vague and ambiguous.

REQUEST FOR PRODUCTION NO. 13:

All documents and communications relating to the Office of the Governor’s consideration, evaluation, or review of any voting legislation proposed, debated or enacted by the North Carolina General Assembly from the 2013 session of the North Carolina General Assembly.

RESPONSE:

Defendant objects to this Document Request on the grounds that:

- (a) it seeks information that is not relevant nor reasonably calculated to lead to the discovery of admissible evidence;
- (b) to the extent that it seeks information protected by the attorney-client privilege, work product doctrine, legislative immunity or privilege, or legislative confidentiality; and
- (c) the phrase “voting legislation” is vague and ambiguous.

REQUEST FOR PRODUCTION NO. 14:

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

RESPONSE:

Defendant objects to this Document Request on the grounds that:

- (a) it seeks pre-enactment information that exceeds a reasonable time frame and is therefore not relevant nor reasonably calculated to lead to the discovery of admissible evidence;
- (b) to the extent that it seeks information protected by the attorney-client privilege, work product doctrine, legislative immunity or privilege, or legislative confidentiality; and
- (c) the phrase “estimate, report, study, or analysis” is vague and ambiguous.

REQUEST FOR PRODUCTION NO. 15:

All documents and communications received or created by the Office of the Governor concerning estimates, reports, studies, or analyses of the costs to voters to secure documents required to obtain photo identification under H.B. 589.

RESPONSE:

Defendant objects to this Document Request on the grounds that:

- (a) it seeks pre-enactment information that exceeds a reasonable time frame and is

therefore not relevant nor reasonably calculated to lead to the discovery of admissible evidence;

- (b) to the extent that it seeks information protected by the attorney-client privilege, work product doctrine, legislative immunity or privilege, or legislative confidentiality; and
- (c) the phrase “estimates, reports, studies, or analyses” is vague and ambiguous.

REQUEST FOR PRODUCTION NO. 16:

All documents and communications received or created by the Office of the Governor relating to the cost or expense that will be incurred by the State in connection with the photo identification requirement set forth in H.B. 589.

RESPONSE:

Defendant objects to this Document Request on the grounds that:

- (a) it seeks post-enactment information and other information that is not relevant nor reasonably calculated to lead to the discovery of admissible evidence; and
- (b) to the extent that it seeks information protected by the attorney-client privilege, work product doctrine, legislative immunity or privilege, or legislative confidentiality.

REQUEST FOR PRODUCTION NO. 17:

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

RESPONSE:

Defendant objects to this Document Request on the grounds that:

- (a) it seeks pre-enactment information that exceeds a reasonable time frame and is therefore not relevant nor reasonably calculated to lead to the discovery of admissible evidence;

- (b) to the extent that it seeks information protected by the attorney-client privilege, work product doctrine, legislative immunity or privilege, or legislative confidentiality; and
- (c) the phrase “estimate, report, study, or analysis” is vague and ambiguous.

REQUEST FOR PRODUCTION NO. 18:

All documents and communications referring or relating to any estimate, report, study, or analysis received or created by the Office of the Governor concerning early voting in North Carolina from 2000 to the present.

RESPONSE:

Defendant objects to this Document Request on the grounds that:

- (a) it seeks pre-enactment information that exceeds a reasonable time frame and is therefore not relevant nor reasonably calculated to lead to the discovery of admissible evidence;
- (b) to the extent that it seeks information protected by the attorney-client privilege, work product doctrine, legislative immunity or privilege, or legislative confidentiality; and
- (c) the phrase “estimate, report, study, or analysis” is vague and ambiguous.

REQUEST FOR PRODUCTION NO. 19:

All documents and communications received or created by the Office of the Governor relating to the cost or expense, including any estimates or analyses, of administering early voting in North Carolina from 2000 to the present.

RESPONSE:

Defendant objects to this Document Request on the grounds that:

- (a) it seeks pre-enactment information that exceeds a reasonable time frame and is therefore not relevant nor reasonably calculated to lead to the discovery of admissible evidence; and
- (b) to the extent that it seeks information protected by the attorney-client privilege, work product doctrine, legislative immunity or privilege, or legislative

confidentiality.

REQUEST FOR PRODUCTION NO. 20:

All documents and communications received or created by the Office of the Governor relating to the cost or expense, of administering local, state, and federal elections in North Carolina from 2000 to the present.

RESPONSE:

Defendant objects to this Document Request on the grounds that:

- (a) it seeks pre-enactment information that exceeds a reasonable time frame and is therefore not relevant nor reasonably calculated to lead to the discovery of admissible evidence; and
- (b) to the extent that it seeks information protected by the attorney-client privilege, work product doctrine, legislative immunity or privilege, or legislative confidentiality.

REQUEST FOR PRODUCTION NO. 21:

All documents and communications received or created by the Office of the Governor relating to any data tracking, recording, or study of voting patterns by race.

RESPONSE:

Defendant objects to this Document Request on the grounds that:

- (a) it seeks pre-enactment information that exceeds a reasonable time frame and is therefore not relevant nor reasonably calculated to lead to the discovery of admissible evidence;
- (b) to the extent that it seeks information protected by the attorney-client privilege, work product doctrine, legislative immunity or privilege, or legislative confidentiality; and
- (c) the phrase “data tracking, recording, or study of voting patterns by race” is vague and ambiguous.

REQUEST FOR PRODUCTION NO. 22:

All documents and communications referring or relating to any estimate, report, study, or analysis received or created by the Office of the Governor concerning out of precinct voting in North Carolina from 2000 to the present.

RESPONSE:

Defendant objects to this Document Request on the grounds that:

- (a) it seeks pre-enactment information that exceeds a reasonable time frame and is therefore not relevant nor reasonably calculated to lead to the discovery of admissible evidence;
- (b) to the extent that it seeks information protected by the attorney-client privilege, work product doctrine, legislative immunity or privilege, or legislative confidentiality; and
- (c) the phrase “estimate, report, study, or analysis” is vague and ambiguous.

REQUEST FOR PRODUCTION NO. 23:

All documents and communications referring or relating to any estimate, report, study, or analysis received or created by the Office of the Governor concerning same day registration in North Carolina from 2000 to the present.

RESPONSE:

Defendant objects to this Document Request on the grounds that:

- (a) it seeks pre-enactment information that exceeds a reasonable time frame and is therefore not relevant nor reasonably calculated to lead to the discovery of admissible evidence;
- (b) to the extent that it seeks information protected by the attorney-client privilege, work product doctrine, legislative immunity or privilege, or legislative confidentiality; and
- (c) the phrase “estimate, report, study, or analysis” is vague and ambiguous.

REQUEST FOR PRODUCTION NO. 24:

All documents and communications referring or relating to any estimate, report, study, or

analysis received or created by the Office of the Governor regarding poll observers in North Carolina from 2000 to the present.

RESPONSE:

Defendant objects to this Document Request on the grounds that:

- (a) it seeks pre-enactment information that exceeds a reasonable time frame and is therefore not relevant nor reasonably calculated to lead to the discovery of admissible evidence;
- (b) to the extent that it seeks information protected by the attorney-client privilege, work product doctrine, legislative immunity or privilege, or legislative confidentiality; and
- (c) the phrase “estimate, report, study, or analysis” is vague and ambiguous.

REQUEST FOR PRODUCTION NO. 25:

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

RESPONSE:

Defendant objects to this Document Request on the grounds that:

- (a) it seeks pre-enactment information that exceeds a reasonable time frame and is therefore not relevant nor reasonably calculated to lead to the discovery of admissible evidence;
- (b) to the extent that it seeks information protected by the attorney-client privilege, work product doctrine, legislative immunity or privilege, or legislative confidentiality; an
- (c) the phrase “estimate, report, study, or analysis” is vague and ambiguous.

REQUEST FOR PRODUCTION NO. 26:

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

RESPONSE:

Defendant objects to this Document Request on the grounds that:

- (a) it seeks post-enactment information that is not relevant nor reasonably calculated to lead to the discovery of admissible evidence; and
- (b) to the extent that it seeks information protected by the attorney-client privilege, work product doctrine, legislative immunity or privilege, or legislative confidentiality.

REQUEST FOR PRODUCTION NO. 27:

All documents and communications relating to information you 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.

RESPONSE:

Defendant objects to this Document Request on the grounds that:

- (a) it seeks pre-enactment information that exceeds a reasonable time frame and additional information that is not relevant nor reasonably calculated to lead to the discovery of admissible evidence; and
- (b) to the extent that it seeks information protected by the attorney-client privilege, work product doctrine, legislative immunity or privilege, or legislative confidentiality; and
- (c) it seeks documents in the possession, custody, or control of persons other than these defendants, such as the United States Department of Justice.

REQUEST FOR PRODUCTION NO. 28:

All documents and communications concerning drafts, notes, talking points, or other materials made in preparation for any public (or media-related) appearance or statement by the Office of the Governor relating to any provisions in H.B. 589 or any new voting law proposed or enacted during the 2013 session of the North Carolina General Assembly.

RESPONSE:

Defendant object to this Document Request on the grounds that:

- (a) it seeks pre-enactment information that exceeds a reasonable time frame and is therefore not relevant nor reasonably calculated to lead to the discovery of admissible evidence; and
- (b) to the extent that it seeks information protected by the attorney-client privilege, work product doctrine, legislative immunity or privilege, or legislative confidentiality.

Subject to the foregoing objections and prior Orders and Agreements between the parties regarding the use and production of electronically stored information, defendant will make relevant and responsive documents available for inspection and copying.

REQUEST FOR PRODUCTION NO. 29:

All recordings made in connection with any public (or media-related) appearance or statement by the Office of the Governor by video or other electronic media relating to any provision of H.B. 589 or any new voting law proposed or enacted during the 2013 session of the North Carolina General Assembly, including draft recordings that were not released to the public.

RESPONSE:

Defendant object to this Document Request on the grounds that:

- (c) it seeks pre-enactment information that exceeds a reasonable time frame and is therefore not relevant nor reasonably calculated to lead to the discovery of admissible evidence; and
- (d) to the extent that it seeks information protected by the attorney-client privilege, work product doctrine, legislative immunity or privilege, or legislative confidentiality.

Subject to the foregoing objections and prior Orders and Agreements between the parties regarding the use and production of electronically stored information, defendant will make relevant and responsive documents available for inspection and copying.

REQUEST FOR PRODUCTION NO. 30:

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

RESPONSE:

Defendant will make responsive documents, if any, available for inspection and copying.

REQUEST FOR PRODUCTION NO. 31:

Any litigation hold notices issued to the Office of the Governor 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.*

RESPONSE:

Defendant will make responsive documents available for inspection and copying.

REQUEST FOR PRODUCTION NO. 32:

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.

RESPONSE:

Defendant objects to this Document Request on the grounds that:

- (a) it seeks information that is not relevant nor reasonably calculated to lead to the discovery of admissible evidence;
- (b) to the extent that it seeks information protected by the attorney-client privilege, work product doctrine, legislative immunity or privilege, or legislative confidentiality;
- (c) it is unduly burdensome; and
- (d) it is premature – defendants will comply with all applicable deadlines regarding the disclosure of exhibits.

REQUEST FOR PRODUCTION NO. 33:

All documents and communications received or created by the Office of the Governor that

reflect or discuss the U.S. Supreme Court's consideration of *Shelby County v Holder* or the constitutionality of Section 5 of the Voting Rights Act from 2012 to the present.

RESPONSE:

Defendant objects to this Document Request on the grounds that:

- (a) it seeks post-enactment information that is not relevant nor reasonably calculated to lead to the discovery of admissible evidence; and
- (b) to the extent that it seeks information protected by the attorney-client privilege, work product doctrine, legislative immunity or privilege, or legislative confidentiality.

Respectfully submitted, this the 8th day of January, 2014

BOWERS LAW OFFICE LLC

By: /s/ Karl S. Bowers, Jr.

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*appearing pursuant to Local Rule 83.1(d)

Counsel for Governor Patrick L. McCrory

By: /s/ Robert C. Stephens

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Counsel for Governor Patrick L. McCrory

CERTIFICATE OF SERVICE

I, Karl S. Bowers, Jr., hereby certify that I have this day served the foregoing **Objections and Responses to Plaintiffs' Joint First Set of Requests for Production of Defendant Patrick L. McCrory, in his official capacity as Governor of North Carolina**, by United States Mail in accordance with the Federal Rules of Civil Procedure to the following:

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This the 8th day of January, 2014.

BOWERS LAW OFFICE LLC

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