

Exhibit E

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Subject: Meet-and-Confer Call with IT Personnel
Date: Thursday, January 09, 2014 10:56:37 PM

Dear Counsel:

Thank you for participating in the meet-and-confer discussion this Tuesday with IT professionals to discuss the Defendants' efforts to produce databases responsive to the Plaintiffs' discovery requests. It is the Plaintiffs' understanding, based on that discussion, that there are two databases within the various North Carolina state agencies that house the information responsive to Plaintiffs' requests -- namely, the State Elections Information Management System ("SEIMS") and State Automated Driver License System ("SADLS") databases -- and that Defendants have not identified any other databases with responsive information at this time. Should the Defendants identify other databases with responsive information, we would ask that Defendants please notify us immediately so that we can have a similar call to discuss facilitating the production of any additional databases.

We understand from the meet-and-confer discussion that the SEIMS database (including the voter history files, the voter registration file, the same day voter registration file, and the provisional balloting file) is readily producible, and can be produced within one week. (We note that the statewide voter registration file on the state's publicly-available FTP site appears incomplete. Wake County is incomplete, and any county that follows alphabetically is not included; we expect any production from the state to contain a complete set of statewide data.) Plaintiffs accordingly request that Defendants produce the SEIMS database within the next week, and no later than Friday, January 17, 2014. While defense counsel noted during our call that there may be confidentiality issues to address before the database can be produced, confidentiality concerns should not delay the production of the database insofar as those issues have already been addressed in the parties' Protective Order. We also note that we asked several questions as to whether or not SBOE has access to time stamp information on ballots cast, and look forward to your response by the same date (Friday, January 17, 2014).

With respect to the SADLS database, the IT professionals indicated that they would locate and provide to us the data dictionary for that database, so that the Plaintiffs can review that dictionary in assessing what portion(s) of the SADLS database need to be produced. Please provide us with that dictionary as soon as possible, but no later than Monday, January 13, 2014.

We look forward to receiving the productions of these databases as soon as possible, and consistent with the discussions with technical personnel in the meet-and-confer. Please confirm that the Defendants intend to provide the information discussed above in the timeframes requested here. If you have any questions, please let me know.

Sincerely,

Bridget K. O'Connor

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