

Multiple Documents

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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
RULE 26(A)(3) PRETRIAL
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 RULE 26(A)(3) PRETRIAL 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), Plaintiffs in the above-referenced actions make the following pretrial disclosures in accordance with Federal Rule of Civil Procedure 26(a)(3):

(i) the name of, and, if not previously provided, the address and telephone number of each witness—separately identifying those the party expects to present and those it may call if the need arises:

Please see Plaintiffs' Joint Good Faith Non-Binding Witness List, attached hereto as Exhibit A. In addition to the witnesses identified on that list, Plaintiffs also reserve the right to call additional witnesses as may be necessary to authenticate evidence, establish the circumstances and content of public statements made by current or former elected officials, or otherwise address evidentiary issues, in the event that appropriate stipulations cannot be reached.

(ii) the designation of those witnesses whose testimony the party expects to present by deposition and, if not taken stenographically, a transcript of the pertinent parts of the deposition:

Please see Plaintiffs' Joint Designation of Deposition Testimony, attached hereto as Exhibit B.

(iii) an identification of each document or other exhibit, including summaries or other evidence—separately identifying those items the party expects to offer and those it may offer if the need arises:

Please see Plaintiffs' Joint Exhibit List, attached hereto as Exhibit C.

Dated: June 30, 2015

Respectfully submitted,

By: /s/ Adam Stein

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CERTIFICATE OF SERVICE

I hereby certify that on June 30, 2015, I electronically filed the foregoing Plaintiffs' Joint Rule 26(A)(3) 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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NORTH CAROLINA STATE CONFERENCE
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Plaintiffs,

v.

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

Defendants.

**PLAINTIFFS' JOINT
GOOD FAITH NON-BINDING
WITNESS LIST**

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

Pursuant to the Court's Order of June 26, 2015 (D.E. 299 in Civil Action No. 1:13-cv-658), Plaintiffs in the above-referenced actions submit this updated Good Faith Non-Binding Witness List as the list of witnesses that Plaintiffs currently expect in good faith to call to testify at trial, scheduled to begin July 13, 2015. This list is subject to change, including adding or subtracting witnesses. Plaintiffs also reserve the right to call any witness identified on Defendants' witness lists and to call witnesses for impeachment or rebuttal purposes.

For the purposes of the Good Faith Non-Binding Witness List, Plaintiffs have indicated whether individual witnesses may be called live or by video, and whether the witness is currently planned as a "will call" witness or a "may call." Plaintiffs' deposition designations will be provided under separate cover. These plans as to individual witnesses are subject to change. For example, a witness listed here as planned to testify live may instead be presented by video or by deposition designation, and the testimony of a witness listed here as planned for presentation by video may be presented by deposition designation or through live testimony. This list is submitted subject to, and without waiver of, any and all appropriate objections to discovery directed at the Plaintiffs.

LAY WITNESSES

Witnesses Who Will Testify Live

Alsobrooks, Amber	Michaux, Henry
Barber, William	Michaux, Renee
Bartlett, Gary	Mock, Becky
Berduo, Josue	Moss, Gregory
Bucholtz, Tracy	Najera, Isabel
Burris, Marc	Owens, Michael
Carr, Emma	Paylor, Yolanda
Colbert, Moses	Phillips, Bob
Compton, Helen	Sancho, Ion
Cosner, Kate	Scott, Kristen
Cunningham, Terrilin	Stein, Josh
Dishong, Randy	Strach, Kim
Duke, Louis	Tutor, Marshall
Farrington, Gwendolyn	Palmer, Maria Teresa Unger
Hicks, Dale	Webb, Barbara
Jackson, Jessica	West, Ebony
Jones, Hobart	White, Jim
Kittrell, William	
Lane, Alexandria	

Witnesses Who May Testify Live

Bryant, Angela	DeLancy, Jay
Cohen, Nadia	Dykes, Hakeem
Degraffenreid, Veronica	Ellis, Robin

Fields, Tony
Gignac, Elizabeth
Hatley, Bishop L. Gene
Hawkins, Pastor Jimmie
Kuniholm, Elizabeth
Lund, Nancy
Malette, Quisha
McCue, George
McKissick, Floyd
Perry, Mary

Pleasant, Marcia Lee
Roberts, Dean
Roseborough, Linda
Sims, Gary
Swanson, Tyler
Walter, Lynne

Witnesses Who May Testify By Video

Abercrombie, Lue
Banks, Victoria
Beatty, Sandra
Boyd-Malette, Charlotte
Brown, Carnell
Chisholm, Jason
Durant, Sherry
Ealy, Alexander
Fisher, Kelvin
Garth, Lynnette
Jensen, Jorgen
Jordan Jr., Carlton

LiVecchi, Brian
Pitt, Tawanda
Rhinehart, Candi
Sidbury, April
Suggs, Gerrick
Thomas, Kelly
Washington, Yvonne
Washington, Timothy
Williams, Stephanie
Windsor, Joseph

EXPERT WITNESSES

Witnesses Who Will Testify Live

Allen, Theodore
Duncan, Cynthia
Hillygus, D. Sunshine
Kousser, J. Morgan
Lawson, Steven
Leloudis, James
Levine, Peter
Minnite, Lorraine

Burden, Barry
Clotfelter, Charles
Gronke, Paul
Lichtman, Allan
Stewart III, Charles
Summers, Kathryn
Webster, Gerald

Witnesses Who May Testify By Video

Vernon-Feagans, Lynne

Dated: June 29, 2015

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on June 29, 2015, I served the foregoing **Plaintiffs' Joint Good Faith Non-Binding Witness List**, by email to all counsel of record, including those counsel listed below.

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OF DEPOSITION TESTIMONY**

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

Defendants.

Civil Action No. 1:13-cv-861

Plaintiffs hereby submit the following designations of testimony in support of their claims at trial. Consistent with the Court's June 4, 2015 Order governing pretrial procedures, Plaintiffs have provided for each deposition excerpt a one-page description of the key facts and relevancy of the testimony being offered in support of their claims at trial. The designations include only the Plaintiffs' designations.

PLAINTIFFS' JOINT DESIGNATIONS OF DEPOSITION TESTIMONY

I. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF LUE ALICE ABERCROMBIE.

Lue Alice Abercrombie is a resident of Wilmington, NC. Ms. Abercrombie's deposition was taken on June 4, 2015. Mrs. Abercrombie's testimony will highlight that: (1) she suffers from a disability and was forced to wait for over three hours to vote in the November 2014 election only to be told that she was in the wrong precinct and it was too late to travel to her correct precinct [12:1-4; 12:15-20]; and (2) her out-of-precinct provisional ballot that was rejected.

Plaintiffs hereby submit the following designations of testimony from the June 4, 2015 deposition of Lue Alice Abercrombie in support of their claims at trial.

Deposition Designations for Lue Alice Abercrombie June 4, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
8	13	8	22
9	1	9	14
9	22	10	18
10	22	11	11
11	14	11	18
11	23	13	25

14	3	14	3
17	7	17	10
17	17	17	25
18	1	18	1

II. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF VICTORIA BANKS.

Victoria Banks provided testimony in her deposition regarding the effect of the prohibition on counting out-of-precinct provisional ballots and the elimination of same-day registration during the early voting period on nursing home residents' right to vote. Ms. Banks is the Activities Manager at the Brian Center, a nursing home located in Hertford in Perquimans County. Her responsibilities include assisting residents with exercising their right to vote. No one from the local board of elections has provided her with any information concerning any aspect of the voting process.

Two Brian Center residents, Mr. Skinner and Ms. Jordan, wanted to vote in the November 2014 election. Both use wheelchairs. Ms. Banks and another employee drove them to the Hertford courthouse so that they could vote. Mr. Skinner was registered in a different precinct, and would have to go to a school outside town to vote. Ms. Jordan was registered in neighboring Chowan County. Ms. Banks decided that they would not drive to Chowan County, so Ms. Jordan did not vote. They then drove to the school so that Mr. Skinner could vote, which took at least 30 minutes and significant additional trouble.

The new law will make it difficult for her to help residents vote in future elections. If it were possible to count out-of-precinct provisional ballots, she could drive nursing home residents to the courthouse and voters would be able to cast a ballot that would be counted. Under current law, however, she will have to drive to multiple polling places to ensure everyone can vote. The lack of same-day registration is also a problem. Ms. Jordan, for example, has decided not to register in Perquimans County because she hopes

to be able to return to Chowan County before the next election. If Ms. Jordan's health does not improve, however, she could be in the same situation in future elections.

Plaintiffs hereby submit the following designations of testimony from the April 21, 2015 deposition of Victoria Banks in support of their claims at trial.

Deposition Designations for Victoria Banks April 21, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
5	5	5	11
5	16	20	15
21	1	21	22
22	22	25	22
31	7	32	3
35	3	35	17
37	6	37	11
39	16	39	18
40	25	41	25
47	18	48	9
55	12	55	18
56	13	57	2
57	8	58	3
58	14	58	25

III. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF SANDRA BEATTY.

Sandra Beatty is a 51-year-old African American woman who lives in Greenville, NC. She is legally blind and a double amputee. She moved from New York to North Carolina in 2011. She faces a number of challenges in day-to-day life because of her physical disabilities. Although she had been a very regular voter in New York, she had not yet registered in North Carolina. She went to vote during early voting, hoping she might be able to register to vote at that time. A poll worker told her that she could vote a provisional ballot, and that it would be counted. Had same-day registration not have been repealed in HB 589, Ms. Beatty would have been able to register and cast a regular ballot that would have counted.

Plaintiffs hereby submit the following designations of testimony from the May 18, 2015 deposition of Sandra Beatty in support of their claims at trial.

Deposition Designations for Sandra Beatty May 18, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
7	9	20	1
20	8	21	20
21	25	26	7
27	3	27	22
28	1	28	16

IV. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF JOSUE BERDUO.

Josue Berduo, a young voter and one of the Duke Plaintiff-Intervenors, was deposed in this matter on March 20, 2015. Plaintiffs' designations highlight his testimony that (1) he typically utilizes early voting to avoid Election Day lines; (2) Berduo used preregistration; (3) in 2013, after moving to Wake County, Berduo utilized one-stop voting and same-day registration to vote in municipal elections; (4) Berduo was actively involved in preregistering students to vote; and (5) during the 2014 general elections, students were bused from North Carolina State University to a polling place at which not all of the students were eligible to vote, causing confusion.

Plaintiffs hereby submit the following designations of testimony from the March 20, 2015 deposition of Josue Berduo in support of their claims at trial.

Deposition Designations for Josue Berduo March 20, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
8	13	8	20
10	18	11	4
15	3	16	14
18	25	19	8
19	25	22	6
28	17	28	24
29	24	30	9
37	22	38	10

V. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF CHARLOTTE BOYD-MALETTE.

Ms. Boyd-Malette is the Assistant Director of Field Services at the North Carolina Division of Motor Vehicles (DMV). In her deposition, Ms. Boyd-Malette describes: (1) DMV services that are available online, including voter registration opportunities available through DMV's online service; (2) a report with which DMV tracks voter registration forms that were not successfully transmitted to the SBOE; and (3) complaints received by DMV customers whose voter registration forms were never received by the Board of Elections from the DMV.

Plaintiffs hereby submit the following designations of testimony from the May 19, 2015 deposition of Charlotte Boyd-Malette in support of their claims at trial.

Deposition Designations for Charlotte Boyd-Malette May 19, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
34	24	35	14
35	17	36	20
43	25	44	11
45	17	46	1
46	18	47	19
138	17	139	12
228	5	230	5
233	15	234	2
233	23	235	16

VI. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF CARNELL BROWN.

Carnell Brown provided testimony in his deposition regarding the effect of the elimination of same-day registration during the early voting period on his right to vote.

Mr. Brown is an elderly, illiterate African-American man who lives outside of Tarboro in Edgecombe County. He lives in extreme poverty. Throughout his life, he has been employed in low-paying occupations such as picking cotton or transporting livestock. He also lacks transportation. His driver's license has been permanently revoked after being convicted for DUI and driving on a suspended license.

In the November 2014 election, he attempted to vote during the early voting period. His brother drove him to the Station Square Mall in Rocky Mount. The town straddles Nash and Edgecombe Counties. Mr. Brown incorrectly thought the mall was located in Edgecombe County. Instead of redirecting him to an early voting location or election day voting precinct in Edgecombe County, the poll worker stated that he could not vote because he was not registered in Nash County and could not utilize same-day registration. As a result, Mr. Brown went home and did not vote.

Plaintiffs hereby submit the following designations of testimony from the April 24, 2015 deposition of Carnell Brown in support of their claims at trial.

Deposition Designations for Carnell Brown April 24, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
5	6	6	4
6	23	11	6
11	10	13	11

13	18	13	23
14	4	15	21
16	6	18	15
31	17	33	6
33	15	34	16
43	2	43	8
44	9	44	14
44	25	46	22
48	23	49	25
50	11	51	10

VII. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF TRACY BUCHOLTZ.

Ms. Bucholtz is Supervisor for the Field Services Help Desk for the North Carolina Department of Transportation, Division of Motor Vehicles (“DMV”), whose responsibilities include ensuring that driver’s license offices, which issue photo ID cards and process voter registrations, are operating correctly. Ms. Bucholtz’ testimony establishes: (1) the processes and procedures for entering voter registration data in the DMV database known as SADLS; (2) how data is inputted into the SADLS system and what discretion DMV employees have in inputting data entry fields in SADLS; (3) the processes and procedures for inquiring as to the voter registration status of DMV customers; (4) the processes and procedures for checking the identities of DMV customers; (5) how voter registration information is reviewed and interpreted in DMV and State Board of Elections databases; (6) how voter registration applications are transmitted from the DMV to the State Board of Elections; (7) the lack of procedures in place for identification of issues in the transmission of voter registration applications to the State Board of Elections; (8) how a transaction in SADLS is permanently deleted unless a customer reaches a certain point in the transaction with the DMV employee; and 9) that the physical voter registration applications, completed at DMV offices, are destroyed after 30 days.

Plaintiffs hereby submit the following designations of testimony from the May 20, 2015 deposition of Tracy Bucholtz in support of their claims at trial.

Deposition Designations for Tracy Bucholtz May 20, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE

14	1	14	9
16	9	16	22
29	6	29	13
55	23	56	2
75	20	77	16
79	1	85	7
88	7	93	2
93	3	95	13
101	3	105	23
107	10	107	25
108	24	126	8
126	9	127	13
127	16	128	17
128	23	132	10
132	21	133	19
132	21	133	19
133	21	134	9
133	21	134	9
134	13	135	9
136	6	137	12
142	22	143	16
143	23	145	25
146	3	146	4
147	9	149	25
150	18	152	4
152	10	152	21
155	10	157	21
155	10	157	21

157	25	159	20
157	25	159	20
160	4	162	17
160	4	162	17
172	14	178	24
260	16	261	16
314	10	317	11
314	10	317	11

VIII. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF DORIS BURKE.

Doris Burke is an election volunteer in Wake County, North Carolina. Ms. Burke was deposed in this matter on June 12, 2015. Plaintiffs' designations of Ms. Burke's deposition are to highlight her testimony that: (1) Ms. Burke volunteered at Chavis Community Center in southeastern Raleigh, in a mainly African-American neighborhood, during almost the entire early voting period and all of Election Day in the November 2014 general election; (2) Ms. Burke saw nearly 300 people turned away without voting, almost all of whom were out-of-precinct voters; (3) based on her conversations with many of the people leaving Chavis without voting, Ms. Burke knew that many the 300 voters who were turned away were not going to to vote elsewhere in the November 2014 general election; and (4) the lines during the early voting period and at the end of the day on Election Day were the longest Ms. Burke has ever seen in her years of volunteering at the polls.

Plaintiffs hereby submit the following designations of testimony from the June 12, 2015 deposition of Doris Burke in support of their claims at trial.

Deposition Designations for Doris Burke June 12, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
6	23	7	14
8	11	8	23
8	25	11	12
11	14	12	9
12	10	19	14
19	25	21	19

34	5	34	14
35	13	36	15
36	21	37	11

IX. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF MARC BURRIS.

Mr. Burris is the information systems director at the North Carolina State Board of Elections. His deposition was held in two parts.

During part I, he testified regarding: (1) the SBOE's database matching efforts in 2011 and 2013 comparing voter data with DMV customer data, including (i) the process by which matching criteria were developed, including the list of 29 matching criteria contained in the SBOE's April 2013 report, and (ii) that these criteria were developed with input from Ray Starling and Tom Farr (see pp. 116, 120-121, 146-147), representing the leadership of the North Carolina House of Representatives; and (2) Mr. Burris could not recall any problems involving the state's voter registration system SEIMS arising from the implementation of same-day registration.

During part II, he testified regarding: (1) the research process undertaken by county boards of elections in conjunction with the North Carolina Department of Motor Vehicles (DMV) to determine whether voters who cast provisional ballots had submitted timely voter registration applications through the DMV but did not appear on the voter list; (2) problems and potential confusion for registrants associated with the voter registration process available to customers of the North Carolina Department of Motor Vehicles; (3) the processes by which the SBOE receives data from other state agencies; and (4) the development of the matching criteria used for the SBOE's database matching efforts in 2011 and 2013.

Plaintiffs hereby submit the following designations of testimony from the April 17, 2014 deposition of Marc Burris in support of their claims at trial.

Deposition Designations for Marc Burris April 17, 2014			
BEG PAGE	BEG LINE	END PAGE	END LINE
13	14	14	8
76	10	77	12
76	24	77	24
79	13	80	3
79	13	80	5
80	14	80	18
81	3	82	1
85	3	85	8
86	1	86	10
86	14	86	15
89	10	90	2
89	10	90	2
93	4	93	14
93	4	94	12
94	13	96	7
97	16	98	20
103	6	104	8
108	21	110	15
109	1	109	18
111	2	111	4
114	3	115	23
114	3	121	21
116	15	117	1
119	15	120	25
121	11	121	21
123	21	124	9

123	23	126	13
136	4	142	14
144	4	147	11
146	12	147	11
163	2	166	10
177	12	179	1
180	5	180	11

Plaintiffs hereby submit the following designations of testimony from the March 5, 2015 deposition of Marc Burriss in support of their claims at trial.

Deposition Designations for Marc Burriss March 5, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
273	17	274	12
275	2	275	16
277	4	277	15
279	1	280	6
279	5	280	20
283	24	286	19
285	10	286	19
288	5	288	14
289	2	291	1
297	8	301	16
302	1	303	7
303	13	310	7
303	18	304	1
305	19	307	4
333	6	333	17

336	8	338	1
338	17	339	12
339	13	340	22
342	17	344	20
343	16	344	20

X. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF EMMA CARR.

Emma Carr provided testimony in her deposition regarding the effect of the elimination of same-day registration during the early voting period on her right to vote.

Ms. Carr is a 75-year old African-American grandmother. Growing up, she heard her father and grandfather talking about having to pay a poll tax to vote. She recalls the effects of segregation, which included being unable to use certain restrooms and having to enter the back of a restaurant to buy food. Since she moved to North Carolina in August 2011, she has voted in almost every election, including off-year special elections.

From 2011 through 2014, she lived in Charlotte in Mecklenburg County. On October 18, 2014, she moved to Concord in Cabarrus County. She registered in Cabarrus County between October 18 and 29. Shortly after submitting her voter registration application, she received a call from a Cabarrus County Board of Elections employee. The employee told her that the board of elections had received the voter registration application, but that Ms. Carr would not be able to vote in Cabarrus County in the November 2014 election because she had not lived in the county long enough. Ms. Carr then asked if she could vote in Mecklenburg County. She had not yet canceled her voter registration there. The employee told Ms. Carr that she could not vote in Mecklenburg County. Since she had already submitted her registration for Cabarrus County, the employee asserted, it would be illegal for her to vote in Mecklenburg County.

Plaintiffs hereby submit the following designations of testimony from the May 28, 2015 deposition of Emma Carr in support of their claims at trial.

Deposition Designations for Emma Carr

May 28, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
8	8	11	1
11	9	17	2
17	10	17	24
18	17	22	14
23	3	27	18
30	15	31	5

XI. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF JASON CHISLOM.

Jason Chislom is a 39-year-old African-American resident of Charlotte, North Carolina. Mr. Chislom was deposed in this matter on June 11, 2015. Plaintiffs' designations of Mr. Chislom's deposition are to highlight his testimony that: (1) Mr. Chislom attempted to vote in Mecklenburg County during early voting in the November 2014 general election, but was told he was not registered to vote in Mecklenburg County; (2) he voted a provisional ballot that did not count; (3) Mr. Chislom had completed and submitted a voter registration form during a voter registration drive at a church several months before the November 2014 general election, after moving to Mecklenburg County from Gaston County. He had no reason to suspect that his registration had not been submitted to the county board of elections and that he was not, in fact, registered to vote. Mr. Chislom served a number of years in the National Guard, and he recognizes the importance of voting. He was dismayed to find out that his ballot did not count. Had same-day registration not been repealed, Mr. Chislom would have been able to cast a ballot that would have counted.

Plaintiffs hereby submit the following designations of testimony from the June 11, 2015 deposition of Jason Chislom in support of their claims at trial.

Deposition Designations for Jason Chislom June 11, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
9	10	11	6
11	9	11	12
11	13	11	22

12	3	12	14
12	15	13	16
13	24	17	20
18	1	18	11
18	14	19	4
19	13	24	4
24	6	24	19
42	17	43	1

XII. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF ERIKA CHURCHILL.

Ms. Churchill is a Legislative Analyst in the Research Division of the North Carolina General Assembly Legislative Services Office.

Ms. Churchill's testimony establishes the limitations and lack of personal knowledge concerning the document Ms. Churchill was asked to assemble by the President Pro Tem of the North Carolina Senate and Speaker of the North Carolina House. In her position as a Legislative Analyst, Ms. Churchill avers that all requests and questions she makes of third-party agencies, such as the North Carolina State Board of Elections, come from and are delivered to individual Legislators, and the legislator making the request controls what Ms. Churchill conveys and delivers.

Plaintiffs hereby submit the following designations of testimony from the June 18, 2015 deposition of Erika Churchill in support of their claims at trial.

Deposition Designations for Erika Churchill June 18, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
11	9	11	22
12	9	12	20
14	23	15	18
16	10	16	25
21	10	21	23
24	18	24	20
32	13	32	21
33	14	33	21
33	22	34	13
35	24	35	24

35	25	36	5
36	6	36	10
36	17	37	14
39	3	39	17
41	2	41	9
42	11	42	13
53	17	54	18
58	13	59	13

XIII. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF NADIA COHEN.

Nadia Cohen is a young North Carolina resident who was disenfranchised in the 2014 elections due to HB 589's elimination of preregistration and same-day registration. Cohen was deposed in this matter on June 3, 2015. Plaintiffs' designations highlight her testimony that she planned to vote in the 2014 elections after turning 18 on October 16, 2014, but learned during the early vote period that she would be unable to register and vote as a result of the changes in the voting laws.

Plaintiffs hereby submit the following designations of testimony from the June 3, 2015 deposition of Nadia Cohen in support of their claims at trial.

Deposition Designations for Nadia Cohen June 3, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
9	6	9	18
14	6	14	19
15	8	15	24
17	7	17	11
17	19	18	16
20	17	22	3
23	11	25	25
26	21	27	3
30	13	31	8

XIV. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF PLAINTIFF CAROLYN COLEMAN.

Plaintiff Carolyn Coleman is a County Commission in Guilford County representing the residents of District 7, a primarily African-American district. Ms. Coleman submitted a declaration for the Plaintiffs and was deposed in this matter on April 14, 2015. Plaintiffs' designations of Ms. Coleman's deposition are to highlight her testimony regarding: (1) the history of discrimination against African-American voters in North Carolina; (2) her voter outreach work in the community, including registering people to vote and transporting voters to the polls; and (3) the impact of HB 589 on her personally and her constituents, particularly with respect to harm caused by the shortening of the early voting period and the elimination of same-day registration and out-of-precinct voting.

Plaintiffs hereby submit the following designations of testimony from the April 14, 2015 deposition of Carolyn Coleman in support of their claims at trial.

Deposition Designations for Carolyn Coleman April 14, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
11	13	12	5
14	12	16	4
18	11	19	3
20	15	21	2
24	9	31	10
35	1	36	17
37	13	37	16
38	11	39	6

XV. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF HELEN COMPTON.

Helen Compton is a retired high school teacher and resident of Durham, North Carolina. Ms. Compton was deposed in this matter on June 4, 2015. Plaintiffs' designations of Ms. Compton's deposition highlight her testimony that: (1) she engaged in voter registration activities in Durham County high schools when pre-registration of 16- and 17-year olds was available and in advance of the 2014 elections, after pre-registration was eliminated due to HB589 [19:17-24]; (2) voter registration was more confusing in 2014 after the elimination of pre-registration [14:21-22; 15:1-12; 20:14-18; 21:11-15, 23-24]; and (3) due to the loss of pre-registration, she was able to register fewer than 20% of the students who expressed interest in registering to vote and had to turn many interested students away [34:18-21; 23:24-25].

Plaintiffs hereby submit the following designations of testimony from the June 4, 2015 deposition of Helen Compton in support of their claims at trial.

Deposition Designations for Helen Compton June 4, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
8	1	8	4
8	10	8	12
8	18	8	21
11	22	12	7
12	1	12	7
12	14	12	15
12	14	12	15
12	17	12	18
12	22	12	23

13	5	13	7
13	10	13	19
13	24	14	8
14	20	16	8
18	10	18	25
19	6	19	24
20	11	20	18
20	23	20	24
21	4	22	9
23	3	23	12
23	20	23	25
24	6	24	15
24	18	26	8
26	14	26	20
27	2	27	4
27	9	27	18
28	1	28	7
28	9	29	14
30	4	30	15

XVI. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF KATE COSNER.

Ms. Cosner is a former County Director of Elections and current County Liaison for the North Carolina State Board of Elections. Ms. Cosner's testimony establishes that: (1) Ms. Cosner is confident in the integrity of elections conducted during her tenure as a director of elections. She recalls no issues with voter fraud during her tenure; (2) Ms. Cosner was made aware of long lines at polling places during Early Voting and on Election Day in November 2014; (3) meeting the cumulative hours requirement for Early Voting is stressful for counties because of the additional costs incurred; (4) training materials were created for the November 2014 General Election but not disseminated to counties; (5) under HB 589, according to the policy of the NCSBE, out of precinct voters who provisionally vote out of precinct "out of convenience" will not have their votes counted, county elections workers are responsible for implementing this provision and making the determination of whether a voter is voting out of precinct "out of convenience," and depending upon the county in which the voter resides, some of these voters will not be informed that their votes will ultimately not be counted; (6) Ms. Cosner cannot say that voters who vote out of precinct because of a lack of transportation or means will have their out of precinct votes counted under this policy; (7) as a county elections official, Ms. Cosner had no problems implementing same-day registration; (8) Ms. Cosner is aware of circumstances involving North Carolina voters appearing to vote on Election Day believing they were registered and not appearing in the poll books; (9) Ms. Cosner had no problems with the pre-registration of voters as a county election

official; and (10) Ms. Cosner is unaware of how requests to keep polls open beyond statutory closing times will be addressed by the SBOE.

Plaintiffs hereby submit the following designations of testimony from the March 4, 2015 deposition of Kate Cosner in support of their claims at trial.

Deposition Designations for Kate Cosner March 4, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
18	13	19	8
20	13	20	18
24	2	24	7
24	2	24	7
24	13	25	16
27	18	27	21
27	24	28	13
31	18	31	20
31	23	31	23
41	14	42	2
52	21	53	18
54	4	55	9
63	6	63	21
83	3	83	21
101	5	101	20
130	2	130	5
130	8	130	17
131	13	133	20
133	24	135	17
135	20	137	18
141	1	141	2

141	17	141	23
142	1	142	2
145	19	145	24
148	25	150	15
156	24	160	13
164	10	167	11
164	10	168	1
202	1	205	14
203	6	203	12

XVII. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF TERRILIN CUNNINGHAM.

Terrilin Cunningham provided testimony in her deposition regarding her experience with early voting and the effect of the changes to out-of precinct voting on her right to vote.

Ms. Cunningham is a 55-year old African-American woman. She has lived in Concord (Cabarrus County) since February 2013. Prior to living in Concord, Ms. Cunningham lived in Charlotte (Mecklenburg County) for approximately eight months. Prior to that, she had lived out of state. In 2012, she voted in Mecklenburg County during the early voting period on a Sunday at the Masonic Lodge—a location which was near her church and was suggested by her pastor. She voted during the early voting period because her car was broken and she was able to ride with her son-in-law.

In November 2014, Ms. Cunningham was unable to vote during the early voting period because of health issues and work demands. On election day, Ms. Cunningham voted at the Concord Fire Station. Based on her 2012 experience, she believed that she could vote there and her vote would count. A poll worker told Ms. Cunningham that she was at the wrong location. After she told the poll worker that she had to get to work and did not have time to go anywhere else, the poll worker suggested that she vote by provisional ballot, which she did. Within minutes of voting, Ms. Cunningham posted on Facebook that she had voted. Months later, she learned from a DOJ employee that her provisional ballot was not counted, which upset her greatly. The day before her deposition, Ms. Cunningham learned that the Cabarrus Senior Center was her assigned polling place. However, she has never seen this building before.

Plaintiffs hereby submit the following designations of testimony from the May 28, 2015 deposition of Terrilin Cunningham in support of their claims at trial.

Deposition Designations for Terrilin Cunningham May 28, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
4	19	7	18
7	22	8	14
13	2	15	7
15	13	17	20
17	23	18	9
18	10	23	16
23	21	29	5
30	16	31	1
34	9	34	17
35	17	36	5
36	13	36	21
40	13	40	25
44	15	44	24
45	11	46	15
47	2	48	7
50	7	50	17

**XVIII. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF
VERONICA DEGRAFFENREID.**

Ms. Degraffenreid, an employee of the North Carolina State Board of Elections (“SBOE”) since 2008, is currently the Elections Preparation and Support Manager for the SBOE. The designated portions of Ms. Degraffenreid’s testimony concern: (1) voter registration policies and procedures; (2) list maintenance policies and procedures; (3) voter registration at public assistance agencies and the North Carolina Division of Motor Vehicles; (4) policies and procedures regarding the issuance and counting of provisional ballots; (5) SBOE procedures, policies, observations, and reported findings when same-day registration was in-effect; (6) how counties conducted the 2014 election without same-day registration; (7) observations concerning early voting before and after HB 589 and SBOE communications to the legislature about reducing the number of early voting days; and (8) the SBOE’s communications with the North Carolina legislature during the creation of the SBOE’s no-match list in 2013.

Plaintiffs hereby submit the following designations of testimony from the March 20, 2015 deposition of Veronica Degraffenreid in support of their claims at trial.

Deposition Designations for Veronica Degraffenreid March 20, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
13	23	13	25
13	23	13	25
14	12	14	24
14	12	14	24
15	12	16	18
15	12	16	18

21	3	22	3
21	3	22	3
23	1	24	15
25	5	26	5
25	5	26	5
30	8	30	10
30	11	30	24
30	11	30	24
31	14	33	21
31	14	33	21
31	14	35	19
34	3	34	22
34	3	34	22
36	16	39	9
36	16	39	9
36	16	39	9
39	25	41	15
39	25	41	15
42	6	44	20
42	6	44	20
47	7	50	4
48	8	50	4
48	8	50	4
54	9	56	15
54	9	56	15
57	1	57	25
63	19	64	5
63	22	64	11

63	22	64	11
69	9	74	20
69	13	72	9
69	13	72	9
73	11	74	12
73	11	74	12
75	3	75	19
75	16	75	19
75	16	75	19
75	16	75	21
75	23	77	23
75	23	77	23
75	23	80	5
78	12	80	5
78	12	80	5
80	14	81	11
80	14	81	11
80	14	81	21
82	2	82	12
83	12	83	17
83	12	84	14
83	12	84	14
83	12	89	5
86	9	86	14
86	9	86	14
87	9	88	9
87	9	88	9
89	9	95	20

90	1	92	6
90	1	92	6
94	10	95	1
95	13	95	20
95	13	95	20
96	1	102	17
96	3	97	20
96	3	97	20
100	6	102	17
100	6	102	17
102	20	103	12
102	20	103	12
102	20	103	22
103	23	105	19
104	1	104	20
104	1	104	20
104	1	104	20
106	12	110	23
106	24	108	16
106	24	108	16
106	24	108	16
109	10	109	23
109	10	109	23
111	2	114	15
111	3	113	18
111	3	113	18
114	11	114	15
114	11	114	15

114	17	114	22
114	17	114	22
114	17	116	6
116	8	118	4
116	21	118	5
116	21	118	5
118	8	119	1
118	8	119	1
118	8	119	1
119	17	120	10
120	18	121	23
122	1	122	20
123	1	124	22
125	11	126	16
131	15	132	13
131	15	132	13
135	14	143	5
135	14	143	5
146	8	147	15
146	8	147	15
158	20	159	20
158	20	159	20
161	13	161	25
161	13	161	25
164	12	164	23
164	12	164	23
165	22	165	23
165	22	165	23

167	20	171	10
167	20	171	10
176	9	177	10
176	9	177	10
179	6	180	13
179	6	180	13
184	7	185	21
184	7	185	21
186	2	186	8
186	2	186	8
186	14	187	3
186	14	187	3
187	19	188	24
187	19	188	24
189	2	189	6
189	2	189	6
189	10	189	17
189	10	189	17
191	16	191	21
191	16	191	21
192	2	192	11
192	2	192	11
195	19	196	8
195	19	196	8
196	16	199	17
196	16	199	17
201	4	202	21
211	24	212	22

211	24	212	22
213	3	214	9
213	3	214	9
218	12	219	24
218	12	219	24
222	8	222	20
222	8	222	20
229	5	229	8
229	5	229	8
231	15	232	15
231	15	232	15
233	6	235	20
233	6	235	20
236	5	236	6
236	5	236	6
237	6	238	22
237	6	238	22
239	23	240	8
239	23	240	8
242	9	242	12
242	9	242	12
260	11	261	6
265	20	268	2
265	20	268	2
265	20	269	9
266	14	268	6
268	8	268	14
268	11	268	14

268	11	268	14
268	16	268	23
268	16	268	23
268	16	268	23
269	2	269	9
269	2	269	9
269	2	269	9
274	24	275	25
274	24	275	25
274	24	275	25
274	24	275	25
287	21	296	20
287	21	296	20
287	21	296	20
297	6	300	7
297	6	300	7
297	6	300	7
306	4	306	21
306	4	306	21
311	8	311	17
311	19	313	3
313	18	316	8
329	6	329	14
329	17	331	11
331	13	333	6
334	3	334	9
334	16	335	9
335	11	336	10

336	13	336	25
337	11	338	1
338	3	338	6

XIX. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF JAY DELANCY.

Jay DeLancy is the Executive Director of the Voter Integrity Project. DeLancy was deposed in this matter on March 19, 2015. Plaintiffs' designations highlight, among other things, that (1) DeLancy played the leading role in the development of SB 666 and SB 667; (2) the purpose of SB 666 and 667 was to keep college students from registering to vote in their college towns; and (3) many of the provisions in HB 589, such as the repeal of same-day registration, were proposed in the Voter Integrity Project's legislative agenda.

Plaintiffs hereby submit the following designations of testimony from the March 19, 2015 deposition of Jay DeLancy in support of their claims at trial.

Deposition Designations for Jay DeLancy March 19, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
11	5	12	21
34	23	36	1
37	17	40	4
42	7	44	22
46	7	46	19
47	11	47	18
48	16	49	22
51	11	53	22
55	4	56	18
59	4	60	6
61	14	61	21
66	15	67	12
68	5	70	5

70	16	73	9
74	9	76	7
79	14	84	3
84	16	84	18
86	13	87	5
89	7	89	20
91	7	96	2
96	25	99	4
103	15	105	3
107	17	108	25
112	14	113	15
117	11	123	17
134	13	135	9
143	18	149	19
185	9	190	8

XX. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF ALLISON DETERS.

Allison Deters is a recent graduate of Appalachian State University in Boone, NC. After graduating in May 2015, she moved to Lenoir, NC, where she is currently a music teacher. Ms. Deters grew up in Virginia, and then decided to attend Appalachian State. During 2014, she decided that she would be staying in North Carolina after she graduated. She went to DMV to trade in her Virginia driver's license for a North Carolina driver's license. She asked to register to vote while at the DMV. During the early voting period of the 2014 general election, she made inquiries as to where she could go to vote. In the process, she found out that she was not in fact registered to vote, despite asking to be registered at DMV. She did not attempt to vote because she was not registered, but if same-day registration had been in effect, she would have gone during early voting to correct her registration issue. Ms. Deters was disenfranchised because of the repeal of SDR.

Plaintiffs hereby submit the following designations of testimony from the May 27, 2015 deposition of Allison Deters in support of their claims at trial.

Deposition Designations for Allison Deters May 27, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
6	21	7	10
7	11	8	12
8	13	9	5
9	6	9	10
9	11	10	22
11	4	11	13

11	14	16	12
16	13	17	2
18	5	18	20
19	15	19	20
19	21	20	3

XXI. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF MICHAEL GARY DICKERSON.

Michael Gary Dickerson is the Director of Elections for Mecklenburg County. Mr. Dickerson was deposed in this matter on July 1, 2014. Plaintiffs' designations of Mr. Dickerson's deposition highlight his testimony that (1) same-day registration "tremendously" cut down on the number of provisional ballots cast in Mecklenburg County; (2) provisional ballots may increase as a result of HB 589's repeal of same-day registration; and (3) out-of-precinct ballots are often cast because voters do not have sufficient time to reach their correct polling location after work or because they have recently changed their residency (within the last 30 days) and are not aware that the law requires them to vote at their old precinct rather than their new precinct.

Plaintiffs hereby submit the following designations of testimony from the July 1, 2014 deposition of Michael Gary Dickerson in support of their claims at trial.

Deposition Designations for Michael Gary Dickerson July 1, 2014			
BEG PAGE	BEG LINE	END PAGE	END LINE
8	20	9	1
31	5	32	4
37	9	38	4

XXII. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF CHERISE DILL.

Cherise Dill is a resident of Hendersonville, North Carolina. Ms. Dill was deposed in this matter on May 7, 2015. Plaintiffs' designations of Ms. Dill's deposition are to highlight her testimony that: (1) when Ms. Dill attempted to register to vote at the DMV, an examiner erroneously told her that she couldn't register unless she held a North Carolina driver license (at the time, Ms. Dill had just moved earlier that year from South Carolina); (2) by the time Ms. Dill learned that the information the DMV examiner had provided her about voter registration was incorrect, the registration deadline for the November 2014 election had passed, and as a result Ms. Dill was unable to vote; (3) when Ms. Dill returned to the DMV to try to get a no-fee ID card for voting purposes, she was erroneously told by an examiner that no-fee ID cards were available only to homeless voters who present a letter from a homeless shelter; and (4) Ms. Dill left the DMV on her second visit without receiving a photo ID because she could not afford to pay for an ID card.

Plaintiffs hereby submit the following designations of testimony from the May 7, 2015 deposition of Cherise Dill in support of their claims at trial.

Deposition Designations for Cherise Dill May 7, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
7	17	8	13
8	14	8	21
8	22	14	15
14	16	16	6
16	7	19	20

19	21	23	12
23	13	24	9
24	10	24	19

XXIII. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF LOUIS DUKE.

Louis Duke, a young voter and one of the Duke Plaintiff-Intervenors, was deposed in this matter on March 19, 2015. He has utilized early voting and same-day registration and, without same-day registration, would have been disenfranchised. Plaintiffs' designations of Duke's deposition highlight his testimony that (1) in 2012 general election, he and many other students at Campbell University had to utilize early voting and same-day registration to vote when their voter registrations were denied; (2) since the passage of HB 589, he and other student organizers have had to engage in increased education and registration efforts to inform students of the changes to the election laws so that they can vote; (3) the elimination of seven days of the early voting period is a challenge for young voters, and it has been one of the greatest challenges he has faced as an organizer because it reduces the window of time he has to engage, educate, and register voters; (4) the elimination of preregistration has hindered his ability to engage young voters—who benefit from being drawn into the electoral process early; and (5) HB 589 and the debates surrounding it regarding young voters have created a culture that discourages young voters from participating in civic society and suppresses their vote.

Plaintiffs hereby submit the following designations of testimony from the March 19, 2015 deposition of Louis Duke in support of their claims at trial.

Deposition Designations for Louis Duke March 19, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
8	8	8	21
21	16	21	24

22	13	25	8
26	7	29	21
32	24	35	11
36	15	37	23
44	1	47	2
49	19	51	19
54	8	58	21
59	13	60	14
63	9	68	14
74	1	77	3
79	9	80	14
81	12	82	16

XXIV. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF SHERRY DURANT.

Sherry Durant is a registered voter who provided testimony in her deposition regarding the effect on her right to vote of the elimination of same-day registration during the early voting period and the reduction of the number of early voting days.

Ms. Durant is a 44 year old African-American voter who resides in McLeansville, North Carolina. She lives in a group home that is managed by a caregiver. Durant has cerebral palsy. It is debilitating and affects her mobility. She said that she does not let her disability stop her from living an active life.

In 2014, Durant experienced problems after trying to vote. Despite those challenges, she wanted to vote during the early voting period, as she had in the past. That proved to be infeasible, however. Her caregiver was very busy and could not find time to transport Durant to the polls without sacrificing her ability to meet the needs of other group home residents. As a result, Durant did not vote in the November 2014 election.

Plaintiffs hereby submit the following designations of testimony from the April 28, 2015 deposition of Sherry Durant in support of their claims at trial.

Deposition Designations for Sherry Durant April 28, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
6	2	18	12
18	16	18	18
18	22	22	7
23	20	28	25

XXV. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF HAKEEM DYKES.

Hakeem Dykes is a resident of Wake County, North Carolina and a student at Shaw University in Raleigh. Mr. Dykes' deposition was taken on June 5, 2015. Mr. Dykes will testify that: (1) on Election Day, November 2014, he volunteered as a vote protector at Chavis Community Center in Raleigh, NC [15:6-7; 13:22-23]; and (2) observed and documented hundreds of voters at Chavis Community Center who were turned away because they were in the wrong precinct. [17:1-10; 23:7-15; 23:7-15].

Plaintiffs hereby submit the following designations of testimony from the June 5, 2015 deposition of Hakeem Dykes in support of their claims at trial.

Deposition Designations for Hakeem Dykes June 5, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
7	13	7	13
7	15	7	15
9	24	10	3
10	6	10	18
11	7	11	10
11	14	11	17
11	19	11	22
12	2	12	7
12	20	12	22
15	6	15	22
16	18	17	10
17	13	17	25
18	18	18	20
19	10	19	18

19	20	20	4
20	18	21	16
21	17	22	2
22	10	22	14
23	1	23	21
24	8	25	25
28	1	28	15

**XXVI. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF
ALEXANDER EALY.**

Alexander Ealy is a 31-year-old African-American member of the United States Army. He has served in the Army for several years now, and has been deployed. He is currently stationed at and lives on Ft. Bragg, in Fayetteville, NC. In 2014, he submitted two different voter registration applications. One was submitted during the early voting period. For each application, the verifications were returned undeliverable, and thus his registration was denied. His address is somewhat cumbersome because he lives on base. But prior to his voter registration applications being returned to the Cumberland County Board of Elections as undeliverable, he received mail via the United States Postal Service at the exact address he listed on his voter registration application. He was and is an eligible voter, although he failed mail verification. His story is illustrative of the errors that the U.S.P.S. makes, and the error in assuming that because a voter fails mail verification, he or she is somehow an ineligible or illegal voter. As a member of the armed services, Mr. Ealy recognizes how important political participation is, and he was dismayed that he was not allowed to vote in 2014.

Plaintiffs hereby submit the following designations of testimony from the May 2, 2015 deposition of Alexander Ealy in support of their claims at trial.

Deposition Designations for Alexander Ealy May 2, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
5	8	5	24
5	25	6	15
6	16	8	23

10	1	14	6
14	7	20	25
21	1	21	18
22	5	30	12
32	21	45	7
45	8	46	8
47	2	54	4
72	25	73	5
73	6	76	3
76	4	76	7

XXVII. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF PLAINTIFF ARMENTA EATON.

Plaintiff Armenta Eaton is an African-American resident of Louisburg, North Carolina and is registered to vote in North Carolina. Ms. Eaton is 65 years old and, due to extensive back and neck surgeries, is unable to stand for long periods of time. Ms. Eaton believes that the reduction in early-voting days will result in greater concentrations of voters during the remaining days for early voting and will result in longer lines, which will impose a substantial burden on her and others' ability to vote.

Ms. Eaton submitted a declaration for the Plaintiffs and was deposed in this matter on March 19, 2015. Plaintiffs' designations of Ms. Eaton's deposition are to highlight her testimony regarding: (1) her voter outreach work in the community, including registering people to vote in North Carolina and engaging in Get-Out-The-Vote activities; and (2) her observations during the 2014 Primary and General Elections as a poll observer during early voting and on election day in Franklin County, North Carolina.

Plaintiffs hereby submit the following designations of testimony from the March 19, 2015 deposition of Armenta Eaton in support of their claims at trial.

Deposition Designations for Armenta Eaton 3/19/2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
17	4	17	10
25	14	26	18
30	22	31	9
33	1	33	15
33	19	33	25
34	4	34	21

36	1	36	22
46	19	47	9
47	25	48	6
65	23	67	6
90	5	90	22
90	24	92	5

XXVIII. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF ROBIN ELLIS.

Robin Ellis is a resident of Spruce Pine, North Carolina, in Mitchell County. Ms. Ellis has served as a poll worker for twelve years, including in the 2014 general election. Ms. Ellis was deposed in this matter on June 2, 2015. Plaintiffs' designations of Ms. Ellis' deposition highlight her testimony that: (1) the citizenship audit authorized by the North Carolina State Board of Elections in 2014 appeared to cause some poll workers to target Latino individuals based on race [6:11-19]; and (2) challenge procedures and processes at the polls caused voter intimidation, embarrassment and confusion [29:25-32:10].

Plaintiffs hereby submit the following designations of testimony from the June 2, 2015 deposition of Robin Ellis in support of their claims at trial.

Deposition Designations for Robin Ellis June 2, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
6	11	6	19
28	20	32	10

XXIX. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF GWENDOLYN FARRINGTON.

Gwendolyn Farrington provided testimony in her deposition regarding the effect of the prohibition on counting out-of-precinct provisional ballots on her right to vote.

Ms. Farrington is an African-American resident of Durham, North Carolina. In November 2014, she attempted to vote after 6 pm on election day at the American Legion building in Durham. She went to the American Legion building because it was very close to her place of employment. Her understanding at the time was that her vote would count even if she voted out of precinct. She was unaware that a law had been passed prohibiting the counting of ballots cast out of precinct.

The poll worker told Ms. Farrington that she was not at her correct precinct and that she could fill out a provisional ballot. In addition, the poll worker provided Ms. Farrington with the name of her correct polling place and told her she could go there to vote. She chose to stay and vote at the American Legion building. This was the only realistic decision for her because the correct polling place would have been closed by the time she picked up her children and drove across town. Ms. Farrington proceeded to fill out a provisional ballot. She did not learn that her vote did not count until she was contacted by someone with the Department of Justice.

Plaintiffs hereby submit the following designations of testimony from the June 2, 2015 deposition of Gwendolyn Farrington in support of their claims at trial.

Deposition Designations for Gwendolyn Farrington June 2, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
6	4	6	9

6	18	10	4
10	11	11	16
12	24	13	24

XXX. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF KELVIN FISHER.

Kelvin Fisher is a resident of Wake County. Mr. Fisher was deposed on May 6, 2015. Mr. Fisher's testimony will highlight the following: (1) on Election Day, November 2014, he voted out-of-precinct at Chavis Community Center in Raleigh, NC [15:2-15]; (2) he was unable to travel to his proper precinct because it was not within walking distance and he lacked funds to take public transportation to his proper precinct [16:9-10; 32:15-19, 20-22]; and (3) his entire provisional ballot was rejected. [18:25; 19:1-11].

Plaintiffs hereby submit the following designations of testimony from the May 6, 2015 deposition of Kelvin Fisher in support of their claims at trial.

Deposition Designations for Kelvin Fisher May 6, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
10	14	10	22
11	4	11	8
11	12	11	21
12	1	13	5
13	20	13	22
15	2	15	15
15	23	17	4
17	9	18	3
28	5	28	21
30	2	30	14
30	19	31	6
31	11	32	5
32	11	33	14

34	3	34	15
36	12	38	7

XXXI. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF TED FITZGERALD.

Ted Fitzgerald is an Elections Specialist II at the SBOE. He was deposed in this matter on March 3, 2015. Plaintiffs' designations of Mr. Fitzgerald's deposition highlight that the SBOE's HB 589 voter outreach team members are all white. +

Plaintiffs hereby submit the following designations of testimony from the March 3, 2015 deposition of Ted Fitzgerald in support of their claims at trial.

Deposition Designations for Ted Fitzgerald March 3, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
16	1	17	5
116	16	117	1

**XXXII. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF
LYNNETTE GARTH.**

Lynnette Garth is a 45-year-old African-American resident of Raleigh, North Carolina. Ms. Garth was deposed in this matter on June 5, 2015. Plaintiffs' designations of Ms. Garth's deposition are to highlight her testimony that: (1) in September 2014, before the voter registration deadline for the November 2014 general election, Ms. Garth, who works as a bus driver, had moved from New Jersey and gone to the North Carolina DMV to get a North Carolina commercial driver license, and had told the examiner during the same visit that she wished to register to vote in North Carolina; (2) Ms. Garth attempted to vote during early voting in the November 2014 general election and was turned away because her name was not on the voter rolls; and (3) Ms. Garth was not offered a provisional ballot when she presented to vote during early voting in the November 2014 general election.

Plaintiffs hereby submit the following designations of testimony from the June 5, 2015 deposition of Lynnette Garth in support of their claims at trial.

Deposition Designations for Lynnette Garth June 5, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
8	8	8	23
8	24	10	22
10	23	15	12
15	17	15	22
16	7	20	18
20	21	22	1
29	13	29	16

XXXIII. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF ELIZABETH GIGNAC.

Deposition Designations for Elizabeth Gignac June 4, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
6	5	6	16
8	22	10	20
11	13	11	21
11	22	13	1
13	2	16	21
16	22	26	8
26	20	27	18
27	19	28	18
28	22	28	25

XXXIV. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF ANNA-PATRICE HARRIS.

Anna-Patrice Harris is a resident of Durham, North Carolina. Ms. Harris was deposed in this matter on May 5, 2015. Plaintiffs' designations of Ms. Harris' deposition are to highlight her testimony that: (1) although Ms. Harris looked up her polling place before going to vote on Election Day in November 2014, her GPS directed her to the wrong polling place; (2) the total process of parking, waiting in line, and being told that she was in the wrong polling place took about forty minutes; (3) election officials at the first polling place where Ms. Harris attempted to vote initially did not provide her with information about where her correct polling place was located, only providing that information when she requested it from a second poll worker; (4) the entire process of going to two polling places, waiting in line, and voting took more than an hour and fifteen minutes; and (5) Ms. Harris had successfully voted an out-of-precinct ballot in the 2012 general election.

Plaintiffs hereby submit the following designations of testimony from the May 5, 2015 deposition of Anna-Patrice Harris in support of their claims at trial.

Deposition Designations for Anna-Patrice Harris May 5, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
7	4	7	24
7	25	16	4
16	5	19	11
19	12	22	2
22	3	23	2
23	3	25	15

26	1	27	15
30	11	31	20
31	21	33	23

XXXV. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF BISHOP LONNIE GENE HATLEY.

Bishop Lonnie Gene Hatley is Senior Pastor of Plaintiff Barbee's Chapel Missionary Baptist Church, is an African American registered voter and resident of Durham County, North Carolina. Bishop Hatley was deposed as the 30(b)(6) witness for Plaintiff Barbee's Chapel Missionary Baptist Church, on April 1, 2015. Plaintiffs' designations of Bishop Hatley's deposition highlight his testimony that: (1) Barbee's Chapel provides transportation to the polls to voters in four counties, engages in voter registration activities, and voter education and voter outreach initiatives [19:19-25; 20:1]; (2) the church had to spend additional time, effort, resources and funds in November 2014 to provide transportation to the polls for its members, the members of its partner church and voters in four counties, and anticipates having to expend additional funds in the future to manage its souls to the polls program under the reduced early voting period [22:23-25; 23:1-7; 25:25, 26:1-2; 20:17-24; 21:2-5, 9, 25; 22:1-2; 23:10-14]; and (3) the church will expend additional time, effort, resources and funds to undertake a new education effort beginning in September 2015 to educate voters about HB589 [39:22-25].

Plaintiffs hereby submit the following designations of testimony from the April 1, 2015 deposition of Bishop Lonnie Gene Hatley in support of their claims at trial.

Deposition Designations for Bishop Lonnie Gene Hatley April 1, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
8	20	8	24
9	6	9	8
9	18	9	25

11	13	11	18
16	7	16	17
17	18	18	1
18	19	19	9
19	19	20	1
20	14	21	5
21	8	21	9
21	14	22	2
22	17	24	5
24	8	24	9
24	12	24	22
24	25	26	12
27	14	28	4
29	6	29	13
30	16	31	25
38	4	38	18
39	19	40	9
41	18	42	4

XXXVI. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF REVEREND JIMMIE HAWKINS.

Rev. Jimmie Hawkins is the leader of the Covenant Presbyterian Church, a congregation of over 200 members. Rev. Hawkins submitted a declaration for the Plaintiffs and was deposed in this matter on March 17, 2015. Plaintiffs' designations of Rev. Hawkins' deposition are to highlight his testimony regarding the impact of HB 589 on Covenant Presbyterian Church's early voting efforts during the 2014 election [13:4-15:9; 25:11-26:1; 26:17-28:7; 82:12-84:19]

Plaintiffs hereby submit the following designations of testimony from the March 17, 2015 deposition of Rev. Hawkins in support of their claims at trial.

Deposition Designations for Rev. Hawkins March 17, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
10	22	10	25
11	17	11	22
12	8	15	9
16	10	17	5
19	12	20	12
20	18	22	25
25	11	26	1
26	17	28	7
29	16	30	14
31	6	33	19
64	8	64	20
82	22	84	19

XXXVII. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF JORGEN JENSEN.

Jorgen Jensen is a resident of Mount Olive, North Carolina. Mr. Jensen was deposed in this matter on May 18, 2015. Plaintiffs' designations of Mr. Jensen's deposition are to highlight his testimony that: (1) Mr. Jensen attempted to vote during early voting in the November 2014 general election but was turned away because he was not registered to vote in Duplin County; (2) Mr. Jensen had recently moved within the Mount Olive city limits, with his previous Mount Olive address located in Wayne County and his new Mount Olive address located in Duplin County; (3) Mr. Jensen had successfully used same-day registration when he voted in 2012; and (4) Mr. Jensen was unaware that state law had changed and that same-day registration would not be available in 2014. He had no reason to expect that the voting process would be any different in 2014 than it was in 2012.

Plaintiffs hereby submit the following designations of testimony from the May 18, 2015 deposition of Jorgen Jensen in support of their claims at trial.

Deposition Designations for Jorgen Jensen May 18, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
7	6	11	2
11	3	14	16
14	17	20	8
20	9	21	18
22	10	22	14
22	15	23	2
27	9	29	8

29	9	33	5
42	25	43	7

**XXXVIII. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF
CARLTON AUGUSTUS JORDAN, JR.**

Carlton August Jordan, Jr., is 50-year-old African-American resident of North Carolina. He has lived in Carteret County for most of his live. In 2013, however, he married and moved to nearby Craven County. He went to the Craven County DMV after moving, to get a new driver's license. He remembers that visit well since he had some tax issues he had to resolve with his vehicle. He told the DMV worker that he wanted to register to vote, and understood that the DMV worker would register him. When he went to early voting in Craven County, though, he was told there was no record of his registration. He cast a provisional ballot that was not counted. Had SDR been in effect, Mr. Jordan, a regular voter, would have been able to cast a regular ballot and have it count.

Plaintiffs hereby submit the following designations of testimony from the June 2, 2015 deposition of Carlton August Jordan, Jr. in support of their claims at trial.

Deposition Designations for Carlton Augustus Jordan, Jr. June 2, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
7	16	12	8
12	9	14	12
14	13	14	22
15	7	15	20
15	21	22	18
22	19	23	9
23	22	24	8
39	5	40	15

XXXIX. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF CAROLYN JUSTICE.

Ms. Justice was a member of the North Carolina House of Representatives from 2003 to 2012. Ms. Justice submitted a declaration in this case and was deposed on July 1, 2014. Plaintiffs' designations of Mrs. Perry's deposition are to highlight her testimony that: (1) Ms. Justice did not draft the declaration submitted on her behalf on this case, and of the bills that are discussed in her declaration, she recollected only the bills that were considered when she was a member of the General Assembly; (2) Ms. Justice's declaration discusses legislation and bills considered when she was no longer a member of the General Assembly; (3) the current North Carolina Senate and House Rules referenced in Ms. Justice's declaration were adopted when she was no longer a member of the General Assembly; (4) substantive changes to a bill can occur during a conference committee, but there is no opportunity to substantively revise a bill in a concurrence vote; (5) Ms. Justice was not a member of the General Assembly when HB 589 was considered and passed; and (6) Ms. Justice was not a member of the General Assembly at the time House Bill 451 and Senate Bill 666 were considered and was not involved in the legislative deliberations over either bill.

Plaintiffs hereby submit the following designations of testimony from the July 1, 2014 deposition of Carolyn Justice in support of their claims at trial.

Deposition Designations for Carolyn Justice July 1, 2014			
BEG PAGE	BEG LINE	END PAGE	END LINE
13	20	19	4
19	5	19	13

20	6	22	11
24	3	25	23
27	16	31	10
31	23	35	13
36	8	49	10

XL. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF PAUL KEARNS.

Paul Kearns is a resident of Apex, North Carolina. Mr. Kearns was deposed in this matter on June 5, 2015. Plaintiffs' designations of Mr. Kearns' deposition are to highlight his testimony that: (1) although Mr. Kearns did not move between the 2012 and 2014 general elections, his polling place changed from Olive Baptist School to Olive Baptist Church; (2) Mr. Kearns does not recall seeing a mailing from the Wake County Board of Elections notifying him of the change in polling place; (3) on Election Day in November 2014, Mr. Kearns drove home from Asheville to vote, arriving at his former polling place about thirty minutes before the polls closed, and was informed that he was in the wrong polling place; (4) Mr. Kearns arrived at his correct polling place with several minutes to spare according to the automated clock on his cell phone, but an election official told him that the polls had closed, so he was unable to vote in the election; (5) Mr. Kearns was not even allowed to vote a provisional ballot; and (6) Mr. Kearns filed a complaint with the State Board of Elections and was told that the poll worker who had prevented him from voting would no longer be permitted to work the polls. Had out-of-precinct provisional ballots been accepted, Mr. Kearns could have voted a ballot in his long-time polling place.

Plaintiffs hereby submit the following designations of testimony from the June 5, 2015 deposition of Paul Kearns in support of their claims at trial.

Deposition Designations for Paul Kearns June 5, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
7	9	7	23

7	24	8	17
8	18	17	23
17	24	19	23
19	24	20	6
20	9	21	2
21	3	21	20
21	21	21	23
22	1	22	1
22	4	22	19
22	20	22	23
22	24	23	10
23	11	23	13
23	23	25	22
25	23	26	16
27	7	27	12
27	13	29	7
29	8	29	16
29	17	30	10
30	17	30	23

XLI. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF KATHLEEN KENNEDY.

Kathleen Kennedy is an election volunteer in Winston-Salem, North Carolina. Ms. Kennedy was deposed in this matter on June 3, 2015. Plaintiffs' designations of Ms. Kennedy's deposition are to highlight her testimony that: (1) Ms. Kennedy volunteered as a poll observer in a mainly African-American precinct in Winston-Salem on Election Day in the November 2014 general election; (2) Ms. Kennedy witnessed a large number of voters, most of whom were African-American, who were turned away because they were in the wrong polling place; (3) Ms. Kennedy was under the impression that many of the voters who were turned away because they were in the wrong polling place would not be able to vote elsewhere during the November 2014 general election; (4) Ms. Kennedy observed long lines at the polling place, which she attributes in part to the high number of out-of-precinct voters; and (5) Ms. Kennedy was so troubled by the high number of out-of-precinct voters that she placed several calls to an election hot line and to the Democratic Party for advice.

Plaintiffs hereby submit the following designations of testimony from the June 3, 2015 deposition of Kathleen Kennedy in support of their claims at trial.

Deposition Designations for Kathleen Kennedy June 3, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
4	3	5	2
5	6	6	2
6	3	6	13
6	14	7	8
7	9	23	1

23	10	23	20
23	21	24	5
24	6	24	22
24	23	25	10
25	13	26	5
26	6	26	17
26	18	27	5
27	6	27	11
27	12	28	9
28	18	29	5

XLII. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF WILLIAM KITTRELL.

Deposition Designations for William Kittrell May 4, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
6	19	7	13
7	14	8	22
9	9	9	17
9	18	11	24

**XLIII. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF
ELIZABETH KUNIHOLM.**

Deposition Designations for Elizabeth Kuniholm May 15, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
5	3	7	21
7	22	10	24
10	25	21	16
21	17	29	12
29	13	30	1
30	2	33	11
33	12	34	8
34	15	35	1

XLIV. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF BRIAN LIVECCHI.

Brian LiVecchi is a former deputy general counsel to the Republican Party of North Carolina and is currently special counsel to the North Carolina State Board of Elections. He was hired by the State Board of Elections in May or June of 2014.

Mr. LiVecchi was never involved in election administration where same day registration, out of precinct provisional voting, or 17 days of early voting were offered. Mr. LiVecchi advises the Executive Director on issues relating to the National Voter Registration Act, including recent allegations that the dramatic decline in voter registration applications submitted through public assistance agencies result from non-compliance with the NVRA.

Mr. LiVecchi also took primary responsibility for conducting a survey after the November 2014 general election of the county boards of elections on wait times experienced by voters, and drafting a report on this survey. This survey was administered via Survey Monkey in late November or early December 2014 after the election. The county boards of elections were not notified before the election that they would be queried as to voter wait times. The methodology employed was admittedly not scientific and potentially inaccurate, and still at least 33 counties reported at least one instance of hour-long waits—a wait time that Mr. LiVecchi himself would characterize as too long. Indeed, despite the State Board's failure to mention this reported reason, some counties did attribute the long lines they witnessed during early voting or on Election Day to the cuts in early voting. Mr. Livecchi's survey also did not distinguish between a 30 minute

wait and a 50 minute wait, despite his acknowledgement that such a difference could be significant to voters.

Plaintiffs hereby submit the following designations of testimony from the May 13, 2015 deposition of Brian LiVecchi in support of their claims at trial.

Deposition Designations for Brian LiVecchi May 13, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
15	10	16	4
16	10	17	5
23	5	23	25
24	1	26	3
27	16	28	15
27	16	34	16
34	17	35	3
34	17	40	16
36	9	37	10
37	21	40	2
43	9	43	10
44	8	45	1
44	8	52	2
46	10	46	18
50	19	51	2
52	17	55	16
54	2	54	4
54	18	54	21
57	9	70	16
63	21	64	11
63	21	64	11

66	7	69	10
66	23	67	15
70	19	71	24
70	22	72	14
72	1	72	3
72	5	73	4
73	5	74	6
76	14	77	21
76	14	77	21
78	2	78	6
78	2	79	19
79	20	82	2
79	24	82	7
81	2	81	21
82	4	84	18
82	25	83	22
87	5	90	2
90	16	90	19
90	23	91	16
91	18	92	15
94	6	95	7
94	6	95	7
94	6	95	9
95	16	99	22
95	17	96	8
100	4	100	12
102	23	108	1
103	2	115	11

112	14	115	22
115	12	116	12
116	14	119	4
116	19	117	5
117	21	119	4
119	8	120	1
119	11	119	17
120	2	121	16
122	16	124	10
122	22	127	1
126	13	126	22
127	9	129	4
133	14	134	10
135	11	137	21
139	7	141	24
158	2	160	15
164	5	167	11
166	23	167	9
167	13	168	4
167	25	168	16
168	8	169	5
168	17	171	6
168	21	169	5
171	11	172	10
173	14	174	6
174	15	174	23
176	6	176	19
176	6	177	16

176	23	180	8
183	23	185	19
185	2	188	2
185	20	188	25
186	1	188	20
189	2	190	10

XLV. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF NANCY LUND.

Nancy Lund, a Duke Plaintiff-Intervenor, actively engages in voter registration and get out the vote efforts and has had to exert more effort to perform those activities since HB 589's implementation. Plaintiffs' designations of Lund's deposition highlight her testimony that (1) as a result of HB 589, it is more difficult to recruit volunteer poll workers to hand out information at early voting polling locations because workers now have to cover extended shifts due to the fact that the reduction in early voting days has caused polling locations to have to extend their daily hours; (2) through her experience registering students at Livingstone College, she has knowledge that many students do not have proper photo ID to vote and have limited means of transportation to obtain it; (3) she has observed first-hand people who have not been able to vote due to the repeal of same-day registration; (4) the elimination of preregistration has made her registration activities more difficult; (5) in 2014, she witnessed people leaving the polls during early vote without voting due to long lines; and (6) her registration and get out the vote efforts have been impacted by the shortened timeline for early voting and the elimination of same-day registration.

Plaintiffs hereby submit the following designations of testimony from the March 16, 2015 deposition of Nancy Lund in support of their claims at trial.

Deposition Designations for Nancy Lund March 16, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
10	18	11	6
11	24	14	13

19	18	20	8
22	13	23	7
26	3	27	6
28	21	30	10
35	21	36	11
37	25	40	21
50	17	51	16
64	15	65	15
90	23	92	6
92	14	95	6

XLVI. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF QUISHA MALLETTE.

Deposition Designations for Quisha Mallette May 19, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
8	7	11	5
11	6	12	16
12	17	16	7

XLVII. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF JAMES MANLEY.

James Manley is an African-American, registered voter and a resident of Enfield, North Carolina, in Halifax County. Mr. Manley was deposed on May 21, 2015. Plaintiffs' designations of Mr. Manley's deposition highlight his testimony that: (1) poll workers did not inform him that he was in the incorrect precinct until after he had waited in line for 35-40 minutes [15:13-16; 13:9-15; 17:1-4]; and (2) he believed that his provisional, out-of-precinct ballot cast at Hollister Elementary School in the 2014 general election would count, and that poll workers did not inform him otherwise [21:20-22:10].

Plaintiffs hereby submit the following designations of testimony from the May 21, 2015 deposition of James Manley in support of their claims at trial.

Deposition Designations for James Manley May 21, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
7	8	7	15
8	18	8	24
9	10	12	1
12	9	13	5

13	9	14	12
15	13	15	16
16	9	17	4
21	20	22	10

XLVIII. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF GEORGE MCCUE.

Mr. McCue testified that the difference between inter-county moves and intra-county moves is a source of confusion for many North Carolinians, including staff at the State Board of Elections. Mr. McCue received calls from voters relating to that confusion. He also testified that as society continues to become more transient, situations in which voters are confused as how to amend their registration status following a move will be more common. He noted that without SDR, these situations, where voters are confused, would be more likely to result in disenfranchisement.

Mr. McCue ran point on the requests made by counties to the State Board of Elections for waivers (“hours reduction request”) from complying with the aggregate hours requirement, which mandated that county boards offer the same aggregate number of early voting hours in 2014 as they did in 2016. His testimony includes a description of the process, including the number of requests made and granted and the basis for the State Board’s decisions. In the November 2014 general election, 33 counties received a waiver, thus not offering the same number of hours as compared to 2010. PP. 124-153.

Mr. McCue also conducted a survey of the counties in 2013, asking them what their opinions were on a potential decrease in the one-stop early voting period. Over 75% of the respondents thought that reducing the early voting period by one week would affect turnout. Nearly half of the counties responding indicated that they would need to purchase additional supplies or equipment if the one-stop period were reduced by one week. More than half of the counties responding indicated that a cut to early voting would place additional demands on staff. P. 174-80.

Mr. McCue also testified regarding: (1) problems and confusion associated with the voter registration process available to customers of the North Carolina Department of Motor Vehicles; (2) the SBOE's lack of information regarding the impact of Multipartisan Assistance Teams (MATs); and (3) procedures that apply to voters with unreported moves.

Plaintiffs hereby submit the following designations of testimony from the May 12, 2015 deposition of George McCue in support of their claims at trial.

Deposition Designations for George McCue May 12, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
70	4	71	6
72	3	73	9
72	10	76	5
73	21	74	1
74	17	75	10
76	6	77	2
78	1	79	24
80	4	81	15
81	17	82	7
83	23	86	9
83	23	87	20
84	14	88	23
87	6	90	12
88	24	90	2
90	4	90	19
90	20	91	17
90	20	92	5

91	6	91	17
92	6	92	24
92	6	94	11
93	25	94	11
93	25	94	11
95	11	98	3
124	16	132	18
124	17	129	16
130	4	134	1
134	2	143	23
134	10	142	3
142	8	143	23
144	1	144	23
144	1	144	23
145	1	145	12
145	1	150	19
145	25	148	22
146	23	149	22
150	10	151	5
150	21	153	19
151	14	153	9
155	16	157	5
158	5	158	8
160	16	163	15
174	14	180	22
174	14	180	22
175	6	177	18
177	22	180	20

180	22	180	22
180	25	182	6
192	22	194	24
195	12	196	4

XLIX. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF BRYAN MCGOWAN.

Bryan McGowan is a resident of Hayesville, North Carolina. Mr. McGowan was deposed in this matter on May 7, 2015. Plaintiffs' designations of Mr. McGowan's deposition are to highlight his testimony that: (1) Mr. McGowan was unable to vote during early voting in the November 2014 general election because had not updated his registration since moving away from Onslow County, where he served in the United States Marines Corps—he recently retired after 20 years of service; (2) Mr. McGowan had deployed with the Marines multiple times and had been able to vote despite being away from the county where he was registered; and (3) Mr. McGowan was unaware that he would not be able to update his voter registration address when he went to early voting in the November 2014 general election. Mr. McGowan was not able to cast a vote that counted in the 2014 general election, but he would have been had SDR been available.

Plaintiffs hereby submit the following designations of testimony from the May 7, 2015 deposition of Bryan McGowan in support of their claims at trial.

Deposition Designations for Bryan McGowan May 7, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
7	9	9	25
10	1	12	11
12	12	15	17
15	18	20	18
21	6	23	9
23	10	26	8
26	12	29	23

30	15	33	16
33	17	37	1
37	2	38	11
40	6	43	14
43	15	45	5

L. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF JANE MEADOWS.

Jane Meadows is a resident of Durham, North Carolina. Ms. Meadows was deposed in this matter on May 15, 2015. Plaintiffs' designations of Ms. Meadows' deposition are to highlight her testimony that: (1) on Election Day in the November 2014 general election, Ms. Meadows reported to the polling place where she had always voted, and a poll worker informed that her new polling place was on the other side of town; (2) because Ms. Meadows had just finished working a long shift as a nurse, she decided she could not make the trip to the other side of town; (3) Ms. Meadows called an election protection hot line and was told by the person on the phone that the poll worker with whom she had spoken had given her incorrect information, and in fact Ms. Meadows' new polling place was close by; and (4) only after calling the election hot line was Ms. Meadows able to identify her correct polling place and vote in the November 2014 general election.

Plaintiffs hereby submit the following designations of testimony from the May 15, 2015 deposition of Jane Meadows in support of their claims at trial.

Deposition Designations for Jane Meadows May 15, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
6	14	7	20
7	21	8	23
8	24	9	20
9	23	14	3
14	4	17	19
18	4	20	14

20	22	21	2
21	3	21	16
21	22	22	7
22	12	22	20

LI. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF REVEREND JOHN MENDEZ.

John Mendez is the Senior Pastor at Emmanuel Baptist Church and served as the Church's 30(b)(6) witness. Emmanuel Baptist submitted a declaration for the Plaintiffs and Reverend Mendez was deposed in his capacity as a 30(b)(6) witness in this matter on March 24, 2015. Plaintiffs' designations of Reverend Mendez's deposition are to highlight his testimony that: (1) HB 589 provisions have been burdensome to the members of his congregation; (2) HB 589 has strained the time and resources of the Emmanuel Baptist's get out the vote efforts; and (3) specifically, as a result of the elimination of Same Day Registration, individuals in his congregation were unable to vote in the 2014 election because they had not registered in time to vote.

Plaintiffs hereby submit the following designations of testimony from the March 24, 2015 deposition of Reverend Mendez for presentation at trial.

Deposition Designations for John Mendez March 24, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
27	18	28	22
32	1	33	2
37	13	39	14
43	3	44	7
45	2	45	18
46	13	46	22
64	24	66	1
73	23	74	16
79	21	80	13
81	1	82	22

LII. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF BRIAN MILLER.

Brian Miller, a young voter and one of the Duke Plaintiff-Intervenors, was deposed in this matter on March 20, 2015. Plaintiffs' designations highlight his testimony that (1) he has utilized early voting in past elections; (2) the reduction in early voting time in the 2014 elections made it more difficult for him to vote than in 2012 elections; and (3) young voters, particularly students, are burdened by the reduction in early voting days because they face the unique constraints of juggling class schedules, jobs, and added travel.

Plaintiffs hereby submit the following designations of testimony from the March 20, 2015 deposition of Brian Miller for presentation at trial.

Deposition Designations for Brian Miller March 20, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
7	22	8	8
13	17	14	6
14	16	14	19
17	17	18	9
20	23	21	12
22	6	22	14
26	19	27	15

LIII. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF BECKY MOCK.

Becky Mock, one of the Duke Plaintiff-Intervenors, was deposed in this matter on March 17, 2015. Plaintiffs' designations highlight her testimony that (1) she has utilized early voting; (2) her ability to vote has been burdened by the reduction in early voting days; (3) she has worked with victims of domestic violence, disabled individuals, and others and has observed that the challenged provisions of HB 589 make it harder for them to vote due to things such as lack of transportation and time constraints; (4) HB 589 prevents her from helping people to register through same-day registration as she has done in the past; (5) because HB 589 makes it more difficult for people to vote, voter-registration and get-out-the-vote resources and efforts must be diverted to assisting individuals with those difficulties rather than allocated to other purposes; (6) in 2012, Ms. Mock observed people dropping out of line to vote because the lines were too long; and (7) there are no buses in Alamance County, making transportation difficult.

Plaintiffs hereby submit the following designations of testimony from the March 17, 2015 deposition of Becky Mock for presentation at trial.

Deposition Designations for Becky Mock March 17, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
7	18	8	2
9	3	10	5
13	8	13	15
22	3	24	11
30	19	31	23
34	7	35	10

58	24	59	9
59	23	62	23

LIV. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF GREGORY MOSS.

Pastor Moss provided testimony regarding the importance of early voting for black voters and how they will be disproportionately harmed by the elimination of early voting.

Moss has served as the senior pastor at St. Paul Baptist Church for approximately 17 years. St. Paul is located in Charlotte and has over 5,000 members, most of whom are African American. Moss is a former vice president of the Charlotte Branch of the NAACP, president of the Lott Carey Baptist Farm Mission Convention, and a member of the executive board and former president of the General Baptist State Convention of North Carolina. Pastor Moss believes the elimination of early voting days disproportionately and adversely impacts black voters. The new law makes it very difficult for volunteers who assist low income black voters in getting to the polls.

While at St. Paul, Moss has actively participated in voter registration, voter education, and voter participation activities in the African-American community (Tr. 22-25, 26-27, 31-33, 41). In 2004, Moss and other black civic leaders successfully lobbied to have Mecklenburg County offer early voting on Sundays as a way to get black voters involved in the political process (Tr. 22-23). These "Souls to the Polls" efforts have included encouraging congregants attending Sunday services to go, en masse, to designated early voting locations to vote (Tr. 35, 62-63). They use various church-owned busses and vans to transport individuals to voting locations and sometimes having caravans of vehicles transport people to voting locations (Tr. 35, 63). In recent years, whenever early voting has been available on a Sunday, Moss has gotten on his motorcycle after service and led a "caravan" of his congregants to the polls (Tr. 62-64).

Plaintiffs hereby submit the following designations of testimony from the June 3, 2015 deposition of Gregory Moss in support of their claims at trial.

Deposition Designations for Gregory Moss June 3, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
12	7	14	22
15	6	16	20
17	5	20	3
22	11	25	2
26	22	29	21
30	9	32	16
32	23	35	11
36	5	49	14
44	23	45	14
46	14	46	22
54	2	57	8
62	9	65	2
65	13	69	17
69	19	70	2
70	4	70	22

LV. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF BRIAN NEESBY.

Brian Neesby is a recent employee of the State Board of Elections. He started working for the Board in late October 2014 as a “Business Systems Analyst.” He never had any experience in elections prior to his employment at the State Board.

Mr. Neesby offered vague criticisms of the mail verification studies relating to same day registrations conducted by the State Board of Elections from 2009 to 2013—analysis conducted by Veronica DeGraffenreid, a longtime State Board employee—but did not identify any actual inaccuracies in the studies. He also claimed that there were inconsistencies between the data relied upon in mail verification studies (2009-2013) and in SEIMS currently, but when asked to identify those inconsistencies, he could not, instead saying, “SEIMS has a very convoluted process that can be interrupted, and I’m still trying to make sure I understand the difference.” 303:16-23.

As of his deposition on April 14, 2015, Mr. Neesby had performed no analysis of the number of voters who might have been allowed to vote had SDR not been repealed, nor had he finished any study of mail verification rates relating to SDR applications.

Mr. Neesby acknowledged that the State Board had changed the way it will conduct its 2015 biennial list maintenance, requiring voters to affirmatively mail a confirmation back to the board of elections (rather than only proceeding with confirmation mailings where a verification mailing was returned undeliverable or the voter had been placed on the inactive list).

Mr. Neesby admitted that he has no expertise in what constitutes voter eligibility.

Mr. Neesby himself was forced to cast a provisional ballot during the 2014 General Election. He presented to the incorrect precinct, but his provisional ballot was counted because his provisional ballot was deemed to be cast because of an “unreported move.”

Plaintiffs hereby submit the following designations of testimony from the April 14, 2015 deposition of Brian Neesby in support of their claims at trial.

Deposition Designations for Brian Neesby April 14, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
215	18	224	7
228	19	230	19
232	21	233	8
299	14	306	20
307	2	307	14
308	5	309	17
309	20	316	12
316	16	321	4
322	19	323	21
323	25	324	14
324	15	326	11

LVI. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF MARIA PALMER.

Maria Palmer is a named plaintiff and resident of Chapel Hill, North Carolina. Ms. Palmer was deposed on March 13, 2015. Ms. Palmer is a Latina elected official who is heavily involved in the Latino community. Plaintiffs' designations of Ms. Palmer's deposition highlight her testimony that: (1) during the 2014 general elections, she witnessed and interacted with numerous voters, including her own son, who encountered difficulties voting or were unable to vote due to cuts in early voting and the elimination of same-day registration and out of precinct voting; and (2) prior to HB 589, she transported new citizens to the polls to register and vote during the early voting period after the October Naturalization ceremony and that the loss of Same-Day Registration prevents new citizens naturalized in the month prior to Election Day from registering and voting [53:2-16, 22-25; 54:1-18].

Plaintiffs hereby submit the following designations of testimony from the March 13, 2015 deposition of Maria Palmer in support of their claims at trial.

Deposition Designations for Maria Palmer March 13, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
12	3	12	9
13	2	13	4
14	7	14	10
16	19	17	16
20	8	20	14
20	16	20	18
20	22	21	5

21	10	23	9
25	24	26	19
27	1	27	6
28	11	28	17
29	2	29	10
29	21	30	12
30	14	30	16
31	16	31	23
32	7	32	11
33	11	33	21
34	12	34	19
35	4	35	13
35	17	35	19
36	1	36	7
36	17	36	18
37	22	38	8
38	19	39	4
39	23	40	5
40	10	41	18
42	14	42	20
43	4	43	8
43	23	43	25
44	3	45	8
45	24	46	2
47	4	47	21
49	1	50	9
51	17	51	19
53	2	53	16

53	22	54	18
57	8	58	4
58	20	59	18
63	1	64	16
64	20	64	22
64	24	65	8
75	16	75	18
76	1	77	8
80	16	80	18
80	25	81	14
82	9	82	21
85	13	85	15
85	20	86	3
89	5	91	8
91	14	91	24
93	22	95	1

LVII. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF PLAINTIFF YOLANDA PAYLOR.

Yolanda Paylor provided testimony in her deposition regarding the effect of the elimination of same-day registration during the early voting period on her right to vote.

Ms. Paylor is a 25 year old medical student who grew up in Orange County. A first generation college student, she attended college in Forsyth County. In 2012, after graduation, she moved back to Orange County. As she moved between the two counties, Ms. Paylor always registered through voter registration drives or through same-day-registration. She voted multiple times in Orange and Forsyth County between 2008 and 2012. Since June 2014, Ms. Paylor has lived in Buncombe County because of medical school obligations. Ms. Paylor believes she is a registered voter in Buncombe County but has not received a voter registration card from the Buncombe County Board of Elections.

In August or September 2014, an employee of MAHEC—the place where Ms. Paylor was doing residency work—provided her with a voter registration form. After she completed the voter registration form and returned it to the employee, he told Ms. Paylor that her voter registration form had been submitted to the BOE. In November 2014, Ms. Paylor went to vote during the early voting period in Buncombe County. At the polling place, she was informed that her name was not in the poll book. Ms. Paylor was provided a provisional ballot, which she completed and thought would count. In March 2015, a DOJ employee informed Ms. Paylor that her provisional ballot did not count. She later contacted the BOE and received confirmation that her ballot was not counted.

Plaintiffs hereby submit the following designations of testimony from the April 30, 2015 deposition of Yolanda Paylor in support of their claims at trial.

Deposition Designations for Yolanda Paylor April 30, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
7	9	8	25
11	24	15	18
16	10	18	8
18	23	18	25
21	16	22	9
23	20	25	17
25	24	26	14
26	21	28	7
28	14	29	11
30	16	34	11
34	20	35	20
36	4	36	22
41	1	41	25
42	19	43	9

LVIII. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF PLAINTIFF MARY PERRY.

Plaintiff Mary Perry is an African-American resident of Wendell, North Carolina and is registered to vote in North Carolina. Mrs. Perry served for 41 years as the President of the Wendell/Wake County branch of the NAACP. Mrs. Perry is 85 years old, and due to her advancing age, she is unable to stand for long periods of time or to walk long distances. Mrs. Perry believes that the reduction in early-voting days will result in greater concentrations of voters during the remaining days for early voting and will result in longer lines, which will impose a substantial burden on her and others' ability to vote.

Mrs. Perry was deposed on March 12, 2015. Plaintiffs' designations of Mrs. Perry's deposition are to highlight her testimony that: (1) her experience with early voting and long lines observed during early voting during the 2014 general election; (2) the historic discrimination she has faced growing up and living in North Carolina; and (3) her role in assisting with the registration of over 10,000 citizens to vote.

Plaintiffs hereby submit the following designations of testimony from Mrs. Perry's March 12, 2015 deposition.

Deposition Designations for Mary Perry March 12, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
10	4	11	8
20	1	20	13
25	15	25	16
25	20	26	14
35	22	36	7

37	10	39	3
40	13	43	1
43	2	43	6
43	11	44	2
45	4	45	13
45	17	46	11
46	23	48	9

LIX. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF TAWANDA PITT.

Tawanda Pitt is a 43-year-old African-American resident of Wilson, North Carolina. Ms. Pitt was deposed in this matter on June 1, 2015. Plaintiffs' designations of Ms. Pitt's deposition are to highlight her testimony that: (1) on Election Day in the November 2014 general election, Ms. Pitt went to her polling place in the middle of the afternoon and waited in line for about forty-five minutes before taking a poll worker's advice to leave and come back later in the day; (2) Ms. Pitt came back later the same day and waited an additional forty-five minutes, at which time she left without voting because she was still not close to reaching the voting enclosure; and (3) Ms. Pitt had never seen lines so long at her polling place before the November 2014 general election, and she attributes the lines at least in part to reduction in the number of early voting days.

Plaintiffs hereby submit the following designations of testimony from the June 1, 2015 deposition of Tawanda Pitt in support of their claims at trial.

Deposition Designations for Tawanda Pitt June 1, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
8	2	8	16
8	23	9	7
9	9	9	15
9	16	12	5
27	25	28	10
28	11	29	22

LX. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF MARCIA PLEASANT.

Marcia Pleasant is an African American, registered voter from Durham, North Carolina. Ms. Pleasant was deposed in this matter on Friday June 5, 2015. Plaintiffs' designations of Ms. Pleasant's deposition are to highlight her testimony that: (1) during the 2014 election, Ms. Pleasant spent an estimated three hours attempting to vote on Election Day due slow-moving, long lines at her polling place [22:10-25; 28:3-7]; (2) at approximately 7:15 p.m., approximately 100 people were in line behind Ms. Pleasant and did not reached the polling place before the polls closed and witnessed people leave the line before voting [23:5-21; 28:24-25; 29: 1-10]; and (3) she was forced to cast a provisional ballot because her name did not appear poll book for that precinct, but poll workers did not inform her that her vote would not count.

Plaintiffs hereby submit the following designations of testimony from the June 5, 2015 deposition of Marcia Pleasant in support of their claims at trial.

Deposition Designations for Marcia Pleasant June 5, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
22	6	27	6
27	15	29	21

LXI. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF CHERIE POUCHER.

Ms. Poucher served as the director of the Wake County Board of Elections from July 1991 through May 2015. Ms. Poucher was also the legislative chair for the North Carolina Association of Directors of Elections when HB 589 was being considered by the North Carolina General Assembly. Ms. Poucher submitted a declaration on behalf of Defendants and was deposed in this matter on July 2, 2014 and April 21, 2015. Ms. Poucher's testimony establishes that: (1) after passage of HB 589, Wake County reduced the number of one-stop early voting hours from 17 to 10 days ((7/2/14 Poucher Dep. 33:25-34-18); (2) HB 589 has not alleviated any administrative process related to out-of-precinct provisional ballots on Election Day because a voter who shows up at the incorrect precinct on Election Day must still be given a provisional ballot (7/2/14 Poucher Dep. 41:24 – 46:22, 47:13– 52:6); (3) provisional voting is an important mechanism to ensure that all citizens have a chance to vote and maintains the integrity of elections (7/2/14 Poucher Dep. 56:7 – 57:6, 66:2-66:22); (4) after the elimination of same day registration, voters who believed they were registered but whose voter registration was not received, could receive provisional ballots which ultimately would not be counted (4/21/15 Poucher Dep. 28:8 - 30:20); (5) same day registration reduces the number of provisional ballots (4/21/15 Poucher Dep. 83:14– 86:3); (6) mailings get returned to the Wake County Board of elections for various reasons, including postal service error (4/21/15 Poucher Dep. 93:5– 97:18) (7) when SDR was in place, voters whose registration did not get conveyed to the BOE, for whatever reason, could still register and vote during the EV period (4/21/15 Poucher Dep. 132:8-135:5; 135:15-

136:18; (7) many voters in Wake County vote during the early voting period (4/21/15 Poucher Dep.146:21– 148:17); and (8) in recent elections, there are few, if any, documented attempts of voter impersonation in Wake County (4/21/15 Poucher Dep. 150:6– 155:11). Further, Ms. Poucher testified with regard to preregistration that: (1) she had no information about how many verification mailings were sent and/or returned as part of the preregistration program (7/2/14 Poucher Dep.78:10-79:24); (2) she had never actually spoken to any confused 16 and 17 year olds and was not aware of any who attempted to vote (7/2/14 Poucher Dep. 17:19-18:20); and (3) the only difference between the system for preregistered voters and regular voters is that preregistered voters are held in queue (7/2/14 Poucher Dep. 18:21 - 21:24; 4/21/15 Poucher Dep. 40:10-15 18:21 - 21:24).

Plaintiffs hereby submit the following designations of testimony from the July 2, 2014 deposition of Cherie Poucher in support of their claims at trial.

Deposition Designations for Cherie Poucher July 2, 2014			
BEG PAGE	BEG LINE	END PAGE	END LINE
11	7	12	10
17	19	21	24
19	14	21	24
22	4	25	23
33	25	34	18
41	24	46	22
47	13	52	6
52	8	52	10
52	21	54	3

55	8	57	6
57	12	57	15
59	9	63	5
63	16	66	22
78	10	79	24

Plaintiffs hereby submit the following designations of testimony from the April 21, 2015 deposition of Cherie Poucher in support of their claims at trial.

Deposition Designations for Cherie Poucher April 21, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
15	15	16	22
17	23	21	23
24	3	30	20
32	8	33	22
33	23	34	3
40	10	40	15
59	3	59	22
59	23	76	21
60	10	61	19
64	15	65	8
69	19	73	3
73	5	73	20
77	17	81	7
82	25	86	3
83	14	86	3
88	4	90	6
88	4	97	18

90	23	93	4
92	14	92	24
93	5	97	18
97	19	99	6
98	9	103	3
103	8	103	24
105	12	105	25
106	4	106	7
106	4	106	7
109	5	116	21
109	8	119	1
119	16	121	10
122	23	124	25
122	23	125	3
122	23	125	20
126	17	132	6
126	23	129	18
130	3	132	6
132	8	135	5
135	15	136	18
137	16	139	12
140	1	142	9
141	9	142	9
146	21	148	17
146	22	150	5
150	6	155	11
151	17	153	25

LXII. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF CANDI RHINEHART.

Rhinehart's testimony supports a finding that NC's stated policy rationale of adopting HB589 to combat voter fraud is tenuous.

Rhinehart worked as an Investigator at the NC State Board of Elections ("SBOE") for two to three years, from roughly 2004 to 2006 or 2007 (Tr. 7-8). During that time, Rhinehart assisted SBOE's Lead Investigator, Marshall Tutor, who was the only other individual at SBOE tasked with investigating election cases not involving campaign finance (Tr. 10-11). Tutor carefully and actively supervised Rhinehart's work on all of the cases she investigated (Tr. 13, 61-62).

Though her job title was Investigator, Rhinehart spent most of her time doing administrative work as there were so few cases for Tutor and her to investigate (Tr. 9-11). For the entire time she worked as an Investigator, she only investigated about ten cases (Tr. 11-12). Some of the cases Rhinehart investigated involved allegations of voter fraud, but they all proved to be meritless (Tr. 15-19). She explained, "... and sometimes people maybe alleged that there is some voter fraud or something, perhaps that a voter voted twice, and when we would investigate and go back and we look at poll books and we look at ballots and we talked to everybody, it would be that poll worker errors would be generally the problem..." (Tr. 15). Rhinehart testified that while she worked closely with Tutor and would discuss his cases with him, she has no recollection of him ever identifying a case where he suspected voter fraud may have actually occurred (Tr. 18-19).

Rhinehart testified that she had observed Tutor at work while assisting him with his investigations and working closely under his supervision (Tr. 20-21). She noted,

“[Tutor] was very thorough ... figuring out who we needed to talk to and making sure that we talked to those people, and he would even talk to them multiple times if need be, and then he would also – if there was any question or anything, he would always check with our general counsel and see, you know, if he needed to do more or what he needed to do” (Tr. 21).

Rhinehart testified that she was “very confident” that the cases she and Tutor closed out did not merit further investigation (Tr. 21).

Plaintiffs hereby submit the following designations of testimony from the April 30, 2015 deposition of Candi Rhinehart in support of their claims at trial.

Deposition Designations for Candi Rhinehart April 30, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
6	10	14	10
14	22	17	4
19	12	20	1
20	3	20	6
20	18	21	15
29	3	29	8
30	4	30	14
34	17	34	22
35	15	35	20
42	18	43	4
61	2	64	7

LXIII. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF DEAN ROBERTS.

Mr. Roberts is the Senior Manager of Post Office Operations for the Greensboro District of the United States Postal Service (“USPS”). He testified regarding: (1) certain personal and USPS background information, including his employment history and the organizational structure of the USPS in North Carolina; (2) the procedures, processes, and mechanisms of how first-class mail with return postage paid is returned to the sender, including a discussion of the reliability and effective return rate of first-class mail with sufficient postage for the piece of mail to be returned to sender in the event the person to whom the card is addressed does not receive the card; (3) problems with Winston-Salem State University employees handling the mail properly, including that for a period of time, university postal shops did not return mail verification cards to the USPS with their outgoing mail as they were supposed to; (4) reasons why mailings sent by Metro Production described in the Declaration of Charles Underwood had different return dates or may not have been returned; and (5) potential shortcomings in the methodology employed by Metro Productions in creating and disseminating a mailing that was used in the Declaration of Charles Underwood.

Plaintiffs hereby submit the following designations of testimony from the May 14, 2015 deposition of Dean Roberts in support of their claims at trial.

Deposition Designations for Dean Roberts May 14, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
5	8	5	10
6	10	8	4

9	20	12	2
12	20	13	4
15	19	22	3
23	16	31	12
32	15	34	11
35	12	36	1
39	6	40	12
41	8	48	19
52	10	77	6
77	24	90	18
97	21	99	7
100	14	100	24
102	19	106	20
107	17	107	24

LXIV. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF SUSAN SCHAFFER.

Susan Schaffer is a resident of North Carolina and a retired attorney. Ms. Susan Schaffer served as a volunteer poll watcher for the November 2014 general election. Ms. Schaffer was deposed in this matter on May 8, 2015. Plaintiffs' designations of Mrs. Schaffer's deposition highlight her testimony that: (1) after waiting 20 to 60 minutes in line, several voters exiting Precinct 54 were not allowed to vote because they were told they were at the wrong precinct [17:6 -21; 20:9-22:17]; (2) most of these voters were African-American [25:25-26:20]; and (3) these voters were not given the option of casting a provisional ballot [22:18-21; 24:13- 25:15].

Plaintiffs hereby submit the following designations of testimony from the May 8, 2015 deposition of Susan Schaffer in support of their claims at trial.

Deposition Designations for Susan Schaffer May 8, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
12	6	14	21
15	14	16	13
17	6	17	21
18	7	18	10
20	9	25	15
25	25	26	20
27	1	29	5
55	13	56	9
58	13	59	10
73	16	74	10

LXV. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF APRIL SIDBURY.

April Sidbury is a 36-year old African-American resident of Cary, North Carolina. Ms. Sidbury was deposed in this matter on May 22, 2015. Plaintiffs' designations of Ms. Sidbury's deposition are to highlight her testimony that: (1) Ms. Sidbury was unable to vote in the November 2014 general election because she was not on the voter rolls in Wake County; (2) Ms. Sidbury had moved from Brunswick County to Wake County before the voter registration deadline for the November 2014 general election; and (3) when Ms. Sidbury moved to Wake County, she received a mailing from the board of elections asking her to confirm her new address, which she did with the understanding that she was updating her voter registration address to Wake County. She was disenfranchised in the November 2014 general election because SDR had been repealed.

Plaintiffs hereby submit the following designations of testimony from the May 22, 2015 deposition of April Sidbury in support of their claims at trial.

Deposition Designations for April Sidbury May 22, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
8	8	9	11
9	12	9	18
9	19	12	13
12	24	13	23
13	24	14	12
16	17	17	23
17	25	18	10
18	14	18	19

LXVI. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF GARY SIMS.

Gary Sims is the current deputy director of the Wake County Board of Elections and has held that position since 2007. Mr. Sims was deposed in this matter on April 15, 2015. Plaintiffs' designations of Mr. Sims' deposition are to highlight his testimony that in the November 2014 general election in Wake County: (1) changes wrought by HB 589 contributed to long waiting times for qualified voters during early voting and on Election Day, and that the effect will likely be even greater in 2016 when turnout is expected to be much higher; (2) Wake County officials are aware that qualified voters whose voter registrations were not transmitted from DMV to the proper boards of election were disenfranchised because of that error—one such example of the DMV's failure was the daughter of the Chief Justice of the North Carolina Supreme Court; (3) elimination of out-of-precinct voting under HB 589 resulted in disenfranchisement of qualified voters whose polling places had changed—those voters may not have moved, and would have only received one mailing from the county board of elections, no matter how long before the election that the new polling place was designated; and (4) delays in mail delivery and postmarking by the United States Postal Service were longstanding and created obstacles to voting for absentee-by-mail voters, newly registered voters, and citizens attempting to register to vote.

Plaintiffs hereby submit the following designations of testimony from the April 15, 2015 deposition of Gary Sims in support of their claims at trial.

Deposition Designations for Gary Sims April 15, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE

18	15	21	14
22	18	23	20
25	13	26	17
28	7	30	5
34	19	35	11
34	23	39	8
34	23	42	21
41	8	42	15
42	22	52	22
42	22	60	2
43	7	53	8
53	18	61	20
54	22	56	24
60	3	61	20
60	15	61	20
62	6	70	1
63	1	68	15
66	9	66	20
67	3	67	14
68	9	68	15
72	21	75	20
76	3	77	23
84	15	88	11
84	19	87	2
89	13	94	5
97	11	99	20
99	21	102	15
100	22	104	14

106	2	106	20
110	21	111	23
115	12	116	11
193	22	194	6
193	22	194	6
194	9	197	23
195	18	196	21
197	25	200	7
204	8	206	15
206	16	210	3
207	13	210	3
210	13	210	17
210	23	212	22
212	24	213	1
227	16	228	8

LXVII. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF BRANDI RENE SMITH.

Brandi Renea Smith is a resident of Morehead City, North Carolina. Ms. Smith was deposed in this matter on May 26, 2015. Plaintiffs' designations of Ms. Smith's deposition are to highlight her testimony that: (1) Ms. Smith was improperly purged from the voter rolls after the 2012 general election by the Carteret County Board of Elections, who had incorrectly identified her as having a felony conviction; (2) Ms. Smith has never been convicted of a felony and did not have any outstanding felony charges between the 2012 and 2014 general elections; and (3) Ms. Smith did not find out she had been erroneously removed from the voter rolls after the 2012 general election until she went to vote on Election Day in November 2014, and as a result she was unable to vote in the November 2014 general election. Ms. Smith is an example of how county boards of elections improperly purge voters, some of whom could be restored to the rolls if same-day registration were available.

Plaintiffs hereby submit the following designations of testimony from the May 26, 2015 deposition of Brandi Renea Smith in support of their claims at trial.

Deposition Designations for Brandi Renea Smith May 26, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
7	21	7	25
8	1	8	7
8	12	9	19
9	20	13	21
14	17	19	7
19	13	20	4

20	13	21	22
23	17	23	23
23	24	25	22
27	3	36	2
36	3	36	10
36	18	37	20
37	21	38	7
38	15	40	7
41	5	52	25
53	7	53	22
54	10	57	8
58	2	58	14
59	14	61	4
63	11	63	25
64	1	66	8
66	23	67	14
67	15	68	8
69	1	69	9
69	10	70	18

**LXVIII. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF
KIMBERLY STRACH.**

Ms. Strach sat for two depositions, one as a Rule 30(b)(6) designee (volume I) and one as an individual. Her individual deposition was held in two parts (volumes II and III). As the 30(b)(6) designee, she testified regarding: (1) the structure, authority, and administrative practices of the State Board and its staff; (2) the SBOE's lack of policies and monitoring regarding voter wait times; (3) a 2013 survey of county boards of elections conducted before enactment of HB 589 regarding the anticipated impact of a one-week cut to the early voting period; (4) the SBOE's 2011 and 2013 memos regarding the likely effects of a one-week cut to the one-stop early voting period; (5) the State Board's consideration of requests submitted by county boards of elections for waivers from HB 589's minimum hours requirement for one-stop early voting (referred to as "hours reduction requests") during the 2014 primary election; (6) procedures governing out-of-precinct voting; (7) procedures governing voter registration, including same-day registration and other methods of registration; (8) SBOE reports regarding the implementation and use of same-day registration; (9) procedures for maintaining an accurate voter list; (10) the SBOE's database matching efforts in 2011 and 2013 comparing the voter registration database with the customer list of the North Carolina Department of Motor Vehicles, including testimony covering, among other things, the process by which matching criteria were developed, including the list of 29 matching criteria contained in the SBOE's April 2013 report and developed as the North Carolina House of Representatives developed the initial version of HB 589; (11) the number and types of cases of voter fraud experienced in North Carolina in recent years; and (12) the

effect of SBOE's implementation of repeal of pre-registration on individuals under the age of 18 who are eligible to register to vote.

During the first part of her deposition as an individual, she testified regarding: (1) the SBOE's oversight of county boards of elections; (2) the multiple factors that tend to drive voter turnout; (3) voter registration procedures; (4) problems encountered, including errors made by election officials, during an election in the town of Pembroke; (5) the benefits of one-stop early voting and the non-uniformity of early voting availability across counties; (6) out-of-precinct voting procedures; and (7) the ability of eligible 17-year-olds to register to vote at the Department of Motor Vehicles.

During the second part of her deposition as an individual, she testified regarding: (1) a report regarding the SBOE's efforts to collect information from county boards of elections about voter wait times experienced during the 2014 general election; (2) the equal ability of registered voters with an "inactive" status as those with an "active" status to cast ballots; (3) the lack of relationship between a removal of a voter from the rolls because of a felony conviction and the validity of the voter's residence address; (4) the incidence of voter fraud in North Carolina and the procedures by which the SBOE investigates fraud allegations and determines whether to refer them for possible prosecution; (5) the mail verification procedures used as part of the voter registration process in North Carolina; (6) problems encountered during a town council election in the town of Pembroke and the failure of local election officials to properly implement the same-day registration procedures; (7) the SBOE's citizenship audit conducted prior to the

November 2014 general election and the very small number of non-citizens or potential non-citizens identified.

Plaintiffs hereby submit the following designations of testimony from the April 16, 2014 deposition of Kimberly Strach in support of their claims at trial.

Deposition Designations for Kimberly Strach April 16, 2014			
BEG PAGE	BEG LINE	END PAGE	END LINE
17	8	18	7
31	19	32	4
32	17	33	4
35	9	35	13
65	23	66	3
72	11	72	22
77	15	79	5
91	3	91	21
93	11	94	6
93	11	94	11
104	24	105	7
106	14	106	17
107	9	108	8
108	20	109	3
129	5	130	3
133	25	137	11
137	24	138	13
139	16	141	4
141	13	143	7
151	3	151	22
159	10	159	25

174	18	175	7
180	2	180	18
180	2	182	1
183	13	185	8
192	11	193	14
195	25	196	20
218	10	218	17
239	5	239	13
239	25	240	18
240	23	241	4
241	11	243	4
267	7	268	9
268	11	269	3
269	6	269	20
269	23	270	11
270	15	271	1
271	5	271	7
274	10	276	8
276	11	276	13
276	15	276	21
276	23	277	19
278	5	278	8
278	10	278	11
293	3	293	9
306	23	311	25
314	21	320	10
323	13	326	24
328	10	330	22

334	1	334	24
335	6	335	14

Plaintiffs hereby submit the following designations of testimony from the July 1, 2014 deposition of Kimberly Strach in support of their claims at trial.

Deposition Designations for Kimberly Strach July 1, 2014			
BEG PAGE	BEG LINE	END PAGE	END LINE
11	14	12	1
15	20	16	1
16	10	16	12
36	15	36	18
40	8	40	25
46	19	47	3
47	9	48	11
65	18	65	25
66	13	67	7
88	3	88	22
92	8	93	18
94	16	94	25
98	9	99	7
100	4	100	19
102	24	104	19

Plaintiffs hereby submit the following designations of testimony from the March 24, 2015 deposition of Kimberly Strach in support of their claims at trial.

Deposition Designations for Kimberly Strach March 24, 2015			
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BEG PAGE	BEG LINE	END PAGE	END LINE
121	10	121	25
123	1	123	10
123	20	124	1
131	2	131	13
142	9	143	11
152	14	158	5
158	7	161	22
161	24	163	4
168	17	168	22
168	17	169	11
169	1	169	20
170	14	170	15
170	19	171	5
170	22	172	6
170	22	178	7
171	13	172	24
173	15	173	23
174	8	174	12
174	13	175	21
174	21	176	11
176	12	176	16
176	22	178	3
177	17	178	7
178	9	181	8
178	14	178	20
178	14	178	20
178	21	181	8

181	11	181	15
181	11	181	20
182	1	182	3
182	5	184	9
182	21	188	10
184	10	184	25
185	10	187	1
187	2	187	24
188	12	189	3
189	5	193	1
189	21	194	15
193	4	194	10
194	12	195	8
195	12	195	19
195	12	196	6
196	11	197	16
196	11	199	10
199	13	203	11
199	25	203	18
204	18	204	22
204	18	205	18
204	25	216	22
207	12	209	13
209	14	211	6
218	12	220	23
218	12	222	5
222	13	222	21
222	23	222	23

222	25	223	3
223	5	223	7
223	9	223	14
227	14	228	7
233	23	234	2
235	23	236	4
237	15	238	7
244	10	244	16
257	9	261	4
262	8	263	7
262	8	264	17
262	8	264	23
274	21	275	19
276	20	277	4
278	23	282	16
284	13	285	15
284	13	285	21
287	20	288	8
287	20	288	8
301	24	302	15
304	16	304	17
304	16	304	17
304	25	305	7
306	15	308	13
317	13	318	19
317	17	319	21
318	18	318	21
318	23	320	1

319	17	321	21
320	4	321	21
320	4	323	15
322	14	322	19
323	25	327	6
325	16	326	5
325	16	326	5
327	1	327	6
327	10	327	11
327	10	331	25
332	4	334	9
334	15	337	11
335	2	335	10
338	5	339	6
339	7	339	8
339	16	342	18
339	23	347	21
347	23	350	2
348	18	349	20
350	3	350	16
350	10	352	5
352	7	354	1
359	23	360	1
360	3	360	11
360	14	361	2
361	4	364	5
364	7	364	20
365	9	366	22

367	10	368	7
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LXIX. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF GERRICK SUGGS.

Gerrick Suggs is a registered voter who provided testimony in his deposition regarding the effect of the elimination of same-day registration during the early voting period on his right to vote.

Mr. Suggs is a young man who currently lives with his parents in Craven County. Since turning 18, he has moved back and forth several times between his parents' home and North Carolina State University, which is located in Wake County. After attending college for a few years, he dropped out of school, came home, and worked as a substitute teacher and football coach at his old high school. In 2011, he returned to N.C. State to complete his education and graduated in May 2014. In July 2014, he moved back home to save money while he was looking for a job.

He voted successfully during the early voting period using same-day registration in Craven County in 2008 and in Wake County in 2012. Mr. Suggs tried to vote during the early voting period in Craven County prior to the November 2014 election. Since he had voted there as recently as the November 2010 election, he figured his vote could count even though he had not updated his registration information since voting in Wake County in 2012. He did not know his vote did not count until he was contacted by someone with the Department of Justice.

Plaintiffs hereby submit the following designations of testimony from the May 8, 2015 deposition of Gerrick Suggs in support of their claims at trial.

Deposition Designations for Gerrick Suggs May 8, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE

5	8	19	6
26	15	27	18
29	17	31	13
31	16	32	22
32	23	33	21
34	9	35	21
35	22	36	20
36	22	37	12
38	10	39	2
39	3	41	2
42	5	42	21
45	7	48	8
49	8	49	19
49	24	51	9
50	11	50	21
51	3	51	9

LXX. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF KELLY THOMAS.

Kelly Thomas is Commissioner of the North Carolina Department of Transportation. Mr. Thomas was deposed in this matter on March 3, 2015. Plaintiffs' designation highlights his authentication of a document.

Deposition Designations for Thomas Kelly March 3, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
248	19	249	15

LXXI. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF MARSHALL TUTOR.

Tutor's testimony supports a finding that NC's stated policy rationale of adopting HB589 to combat voter fraud is tenuous. Tutor has worked as an Investigator/Lead Investigator for the NC State Board of Elections ("SBOE") for over 12 years (Tr. 10). From 2003 to 2014, Tutor personally investigated or assisted with the investigation of every single potential or alleged election fraud matter investigated by SBOE (Tr. 14-25, 168-169, 67). These matters included any matters referred by county state boards, cases flagged by SBOE after analyzing databases, and referrals from citizens, organizations, and political parties (Tr. 24-27).

From 2003 to 2012, the SBOE closed out roughly half of the matters Tutor investigated after determining that they were "frivolous" (such as matters clearly caused by poll worker error) (Tr. 29-36, 44-45). The SBOE referred the other half to local prosecutors (Tr. 35). SBOE had a policy of referring cases to prosecutors regardless of whether there was any evidence of criminal intent (T. 32, 33). In fact, there were "many instances" where the SBOE referred cases to prosecutors even though they involved "an accident" or "a mistake" by the voter, including cases involving elderly voters with dementia voting twice by accident (Tr. 33, 67-76, 98-104).

Tutor explained that the chart included in Exhibit 313 reflects his office's best estimates of cases referred to local prosecutors from 2000 to 2012 (Tr. 56-58, 96-97). The chart shows that 660 cases were referred over a 12 year period, the vast majority of which were allegations of felons voting, double voting, or absentee ballot fraud. Only two cases (in 2004 and 2012) were alleged voter impersonation cases (Ex. 313). The

chart includes many cases lacking any evidence of criminal intent, as well as matters that may have been double-counted (Tr. 78-79). The 2012 voter impersonation case was not charged and likely involved an individual who was “testing the system.” (Tr. 62). Tutor does not recall whether prosecutors charged anyone for the only other voter impersonation case detailed in the chart – the one in 2004 (Tr. 61-67).

Plaintiffs hereby submit the following designations of testimony from the March 19, 2015 deposition of Marshall Tutor in support of their claims at trial.

Deposition Designations for Marshall Tutor March 19, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
10	18	10	23
11	25	12	10
13	5	15	11
21	15	31	10
30	19	31	4
31	20	37	18
33	18	34	8
34	16	35	24
36	9	36	24
39	1	39	15
39	1	39	20
39	22	40	7
40	11	41	11
42	6	44	5
44	22	46	5
49	20	50	3
50	13	51	9

52	4	53	7
55	16	56	6
56	24	59	7
57	12	59	7
59	19	61	4
61	16	62	23
63	21	64	9
64	25	65	22
66	22	72	11
73	1	75	16
74	18	76	11
76	12	79	16
80	1	82	1
80	1	91	10
92	19	93	13
96	8	117	25
96	13	98	3
98	7	104	21
105	3	105	14
105	20	110	3
110	17	112	5
112	23	117	25
119	5	123	15
119	8	123	15
124	5	128	21
129	3	129	16
130	3	130	7
130	10	130	24

133	12	133	16
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LXXII. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF DR. LYNNE VERNON-FEAGANS.

Dr. Vernon-Feagans is the William C. Friday Distinguished Professor in Child Development and Family Studies in the School of Education at the University of North Carolina at Chapel Hill and the principal investigator of the Family Life Project (FLP), a study of non-urban families and their children in the United States. Dr. Vernon-Feagans presents data from the FLP's representative sample of 773 families in non-urban North Carolina to identify factors in non-urban African American families' daily living (e.g. poverty, less access to transportation, and frequent residential moves) that would impact their ability to comply with the requirements of HB 589. To demonstrate the disparities in the daily lives of African American and non-African American adults that go beyond just being poor, Dr. Vernon-Feagans compared poor African American families to poor non-African American families.

Dr. Vernon-Feagans' analysis found that factors associated with living in rural settings or associated with poverty, including limited access to transportation, computers and internet services, as well as lower levels of literacy disproportionately impacted African-Americans in the FLP representative sample, when compared to non-African Americans. In addition, African American families experienced more instability in living conditions (more frequent residential moves), and less predictability in their daily lives than non-African American families. Dr. Vernon-Feagans opines that these multiple factors, among other things, can disproportionately hinder African American adults from participating in civic and community life.

Plaintiffs hereby submit the following designations of testimony from the April 14, 2015 deposition of Dr. Lynne Vernon-Feagans in support of their claims at trial.\

Deposition Designations for Dr. Lynne Vernon-Feagans April 14, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
6	3	6	5
6	13	6	17
7	20	10	24
12	3	12	16
13	17	14	23
15	23	17	17
18	20	23	4
23	15	26	6
26	13	26	20
27	7	27	8
27	14	27	18
27	22	31	19
33	1	34	23
35	5	35	6
35	12	36	15
36	18	36	19
37	1	37	25
38	1	38	21
39	2	40	11
42	24	44	21
45	1	45	2
45	8	45	23
46	6	46	18

46	22	47	22
47	23	47	24
48	7	49	5
49	11	50	12
51	13	51	13
51	21	53	22
53	25	55	1
67	17	68	8
72	2	72	23

LXXIII. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF LYNNE WALTER.

Lynne Walter, one of the Duke Plaintiff-Intervenors, was deposed in this matter on March 19, 2015. Plaintiffs' designations highlight her testimony that (1) she utilizes early voting; (2) HB 589's reduction of early voting days makes it more difficult for her to vote because she travels frequently; (3) while volunteering in Wake County during the 2012 primary, Walter observed long lines (1.5 to 2 hours) during the early voting period; and (4) during the 2014 general election early voting period, it took Ms. Walter longer than usual to vote.

Deposition Designations for Lynne Walter March 19, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
7	15	11	18
15	9	15	23
16	8	16	21
18	23	19	13
26	4	26	16
36	7	40	15
43	25	44	12
45	20	48	4

I. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF BESSIE WARD.

Bessie Ward provided testimony in her deposition regarding the effect of the elimination of same-day registration during the early voting period on her right to vote.

Ms. Ward is an 82-year old African-American woman who has lived in Carteret County her entire life. She attended a segregated school through sixth grade. After that, she left school to earn money for her family, gaining employment as a domestic worker in various homes. She worked in that capacity for approximately 62 years. Ms. Ward has never driven a car, does not have a computer, and has never accessed the internet. Ms. Ward is relatively new to participating in the electoral process. She voted for the first time in the November 2008 presidential election, and she voted again in November 2012. She has never voted by mail and is unfamiliar with the requirements related to doing so. Since she does not drive, she has to be transported to the polls.

Ms. Ward attempted to vote in the November 2014 election during the early voting period. Her nephew drove her to an early voting location. The poll worker could not find her in the poll book and called a Carteret County Board of Elections employee. That employee stated that Ms. Ward was not listed as a registered voter. She then filled out a provisional ballot. Her nephew subsequently took her to the board of elections office to try to resolve the registration issue, but they were unsuccessful. Her provisional ballot was not counted. The whole experience greatly upset Ms. Ward.

Plaintiffs hereby submit the following designations of testimony from the May 8, 2015 deposition of Bessie Ward in support of their claims at trial.

Deposition Designations for Bessie Ward

May 8, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
5	6	8	8
9	9	12	10
12	13	13	9
13	24	14	10
14	23	15	11
17	19	19	8
20	20	22	17
23	2	23	8

II. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF TIMOTHY WASHINGTON.

Timothy Washington is an African-American resident of Goldsboro, NC. Mr. Washington was born with physical disabilities, including two cleft feet. He has had surgery on both hips, and can only walk with the aid of crutches. He and his wife, who also has significant health issues, have to pay for medical expenses out of pocket. He was excited to vote in the November 2014 general election because he and his wife received a letter from President Obama encouraging them to vote. Mr. Washington believed his vote counted even though he did not go to the right polling place. He went with wife to vote on Election Day. He voted at the library, only a couple of blocks away from where he lives. Because of his disabilities and his wife's illness, it took the Washingtons fifteen minutes to walk from their apartment to the library. It would have been physically impossible for them to go to their correct polling place. It was simply too far to walk, and the bus would not take them there. They were not able to find anyone to give them a ride that day. He called all the people he knew, but they were busy.

Plaintiffs hereby submit the following designations of testimony from the April 20, 2015 deposition of Timothy Washington in support of their claims at trial.

Deposition Designations for Timothy Washington April 20, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
8	2	9	5
9	6	9	10
9	23	16	1
16	2	16	24
16	25	19	6

20	7	22	7
22	8	23	2
23	9	24	7
24	8	24	13
24	14	25	4
25	25	26	6
42	7	45	5
45	8	45	13
45	21	47	21

III. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF YVONNE WASHINGTON.

Yvonne Washington is a registered voter who provided testimony in her deposition regarding the effect of the prohibition on counting out-of-precinct provisional ballots on her right to vote.

Ms. Washington is a resident of Goldsboro. A two-time cancer survivor, she has endured two strokes and continues to suffer from depression and problems with her back. In addition to being in constant pain, she falls multiple times every day. She has to take at least 20 pills daily. Her income is limited, and she has to pay for many medical expenses out of pocket because insurance does not cover everything.

In the November 2014 election, Ms. Washington and her husband attempted to vote on election day at a library located a couple of blocks from her residence. The walk to the library was difficult. It took 20 to 30 minutes, and she suffered a fall that caused scarring on her legs. Once they got there, the poll worker told them to go to a different polling place. It would have been physically impossible to do so, however, because they lacked the requisite transportation. The distance was too far to walk, the bus would not take them there, and they were not able to find anyone to give them a ride that day. In the end, she voted a provisional ballot at the library that did not count.

Plaintiffs hereby submit the following designations of testimony from the April 20, 2015 deposition of Yvonne Washington in support of their claims at trial.

Deposition Designations for Yvonne Washington April 20, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
5	6	19	17

19	25	20	2
20	12	25	8
25	25	26	7
28	10	29	6
29	18	29	25
30	12	30	14
32	4	37	1
38	3	39	2
39	9	40	16

**IV. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF
MARIANNE WEANT.**

Marianne Weant is a resident of Cary, North Carolina. Ms. Weant was deposed in this matter on June 9, 2015. Plaintiffs' designations of Ms. Weant's deposition are to highlight her testimony that: (1) Ms. Weant wanted to vote during early voting in the November 2014 general election because her registration address was in Mecklenburg County, where she had previously lived; (2) when she moved from Mecklenburg County to Wake County, she received a mailing from the Mecklenburg County Board of Elections asking her to confirm that she had moved and to provide her new address, and she complied with the understanding that her registration address would be updated to Wake County; (3) Ms. Weant did not find out until the early voting period during the November 2014 general election that her registration address had not been updated and that she was not registered to vote in Wake County; and (4) Ms. Weant works and has three small children, the youngest of which are twins. Had SDR not been repealed, Ms. Weant would have cast a ballot that would have counted.

Plaintiffs hereby submit the following designations of testimony from the June 9, 2015 deposition of Marianne Weant in support of their claims at trial.

Deposition Designations for Marianne Weant June 9, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
6	22	7	25
8	1	10	14
10	15	13	14
14	8	14	15
14	16	15	2

15	3	15	14
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V. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF BARBARA WEBB.

Ms. Webb is the former Director of Driver Services at the North Carolina Division of Motor Vehicles (DMV) and was designated by Defendants as a 30(b)(6) representative for the DMV. In the portions of Ms. Webb's deposition that Plaintiffs have designated, Ms. Webb: (1) describes how voter registration forms are processed at the DMV and transmitted to the State Board of Elections system, including DMV procedures relating to transmission failures; (2) describes discrepancies in an individual's record at the Social Security Administration that *would not* prevent the DMV from verifying the individual's identity; (3) explains that the DMV provides voter registration opportunities only to DMV customers applying for DMV services; (4) explains that individuals are not required to update their voter registration information when they update their address with the DMV; (5) explains that students who possess an out-of-state driver's license and who seek a no-fee Voter ID card are told that they must surrender their out-of-state license; (6) explains that the DMV failed to offer voter registration services to 17 year olds; and (7) describes the delivery process for DMV credentials.

Plaintiffs hereby submit the following designations of testimony from the January 23, 2015 deposition of Barbara Webb in support of their claims at trial.

Deposition Designations for Barbara Webb January 23, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
14	12	15	21
17	20	19	13
23	12	24	24

27	17	28	4
115	4	115	23
122	24	126	11
200	7	201	4
201	5	203	13
204	25	205	11
204	25	205	20
206	25	210	24
210	25	212	4
210	25	212	4
220	21	221	17
231	16	233	7
272	19	275	20

VI. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF EBONY WEST.

Ebony West, a young voter and one of the Duke Plaintiff-Intervenors, was deposed in this matter on March 20, 2015. Plaintiffs' designations highlight her testimony that (1) she has utilized early voting and same-day registration; (2) shortening the early voting period has made it harder for West to vote due to her school schedule; (3) the elimination of same-day registration may make it harder for West to vote in the future if she has to reregister because she moves (as she has done in the past)—West, like many college students, has moved annually during her time in college; (4) HB 589's challenged provisions burden West's extensive voter-registration and get-out-the-vote activities by limiting the period during which she can transport people to the polls, through the reduction in the early voting time period; making her unable to register people using same-day registration; and causing her to have to increase her educational efforts; (5) HB 589 generally makes it harder to engage and encourage new voters because it created an additional requirement to vote (i.e., obtaining a voter ID) while also creating more restrictions for people to be aware of (i.e., less time for early voting, no SDR, no OOP).

Deposition Designations for Ebony West March 20, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
8	11	10	21
11	23	12	19
16	7	17	24
19	24	19	25
24	8	24	20
25	4	26	22

29	20	32	12
32	19	33	16
35	12	40	9
41	13	45	17
46	8	46	13
47	22	48	23
49	3	50	21
51	19	52	19
53	2	53	5
54	25	56	24
64	9	64	24
68	3	68	20
70	25	71	2

VII. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF MALCOLM WILSON.

Malcolm Wilson provided testimony in his deposition regarding the effect of the prohibition on counting out-of-precinct provisional ballots on his right to vote.

Mr. Wilson is a lifelong resident of Greenville in Pitt County. A painter by trade, he has a high school degree but never attended college. Mr. Wilson is African American. A frequent voter, participating in the electoral process is critical to Mr. Wilson. He votes both on election day and during the early voting period. In the last few years, he has voted at the American Legion building, the West Greenville Recreation Center, and the Sylvia Chapel Baptist Church. He has never voted by mail. Voting by mail is less secure than voting in person, in his opinion, because an absentee ballot can get lost in the mail.

Mr. Wilson usually votes with his wife. She directs their activities and usually tells him where to vote. On November 4, 2014, however, he was anxious to vote. He decided to go to the polls by himself in the morning. First, he drove to the American Legion building, but found that voting was not being held there. From there, he went to the West Greenville Recreation Center, mistakenly thinking that it was his correct polling site. A poll worker there said he was not in the registration book, and he was directed to another table to complete a form and fill out a ballot. The poll worker did not say whether or not his vote would count, or if his ballot was similar or different from others. Mr. Wilson left the polling place content that his vote would count. Mr. Wilson learned his vote did not count months later, when he received a call from a DOJ employee.

Plaintiffs hereby submit the following designations of testimony from the May 5, 2015 deposition of Malcolm Wilson in support of their claims at trial.

Deposition Designations for Malcolm Wilson May 5, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
7	4	7	25
8	5	12	15
12	21	15	2
16	19	18	3
21	9	23	23
24	19	25	11
27	9	28	5
32	15	33	22

VIII. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF JOSEPH WINDSOR.

Joseph Mat Windsor is a 33-year-old white male from Surry County NC. He grew up in NC and was a regular voter. During the 2012 presidential election, he was attending graduate school in Australia. He contacted the Surry County Board of Elections to request a UOCAVA ballot, which he received and voted. He had no idea that by utilizing a UOCAVA ballot, he was making his registration temporary. Having no reason to assume that he was not still registered in Surry County, Mr. Windsor went to early voting in the November 2014 general election. He flew home from a work trip specifically to get to an early voting site in time to vote during early voting. When he arrived, he was informed that his registration had been cancelled after his UOCAVA ballot. He was not offered a provision ballot. Mr. Windsor was upset that he was disenfranchised. Had SDR been an option, Mr. Windsor would been able to cast a ballot that counted.

Plaintiffs hereby submit the following designations of testimony from the May 28, 2015 deposition of Joseph Windsor in support of their claims at trial.

Deposition Designations for Joseph Windsor May 28, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
10	11	12	2
12	3	12	7
12	8	13	21
13	22	15	25
16	1	19	10
19	11	20	9
20	20	21	6
21	7	21	19

21	20	22	7
22	8	23	10
23	15	23	22

IX. PLAINTIFFS' DESIGNATIONS OF DEPOSITION TESTIMONY OF COURTNEY WOODARD.

Courtney Woodard is 27-year old African-American resident of Henderson, North Carolina. Ms. Woodard was deposed in this matter on June 10, 2015. Plaintiffs' designations of Ms. Woodard's deposition are to highlight her testimony that: (1) Ms. Woodard waited in line to vote for thirty or forty-five minutes during early voting in the November 2014 general election, only to find out that she was not registered to vote; and (2) Ms. Woodard living situation has been in flux in past years, and she just recently moved home from Franklin County to live with family because of emergency situation; (3) Ms. Woodard believed that she had previously registered to vote during a visit to a social services agency in Vance County, and received mailings for election contests in Vance County, confirming her belief that she was registered in Vance County.

Plaintiffs hereby submit the following designations of testimony from the June 10, 2015 deposition of Courtney Woodard in support of their claims at trial.

Deposition Designations for Courtney Woodard June 10, 2015			
BEG PAGE	BEG LINE	END PAGE	END LINE
8	13	9	14
9	15	10	21
10	22	11	9
11	10	12	12
12	13	14	11
14	12	16	12
16	14	17	5
17	7	17	17
17	22	18	21

19	8	19	17
19	18	21	24
21	25	24	17

Dated: June 30, 2015

Respectfully submitted,

By: /s/ Adam Stein

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CERTIFICATE OF SERVICE

I hereby certify that on June 30, 2015, I served the foregoing **Plaintiffs' Joint Good Faith Witness List**, by email to all counsel of record, including those counsel listed below.

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EXHIBIT C: PLAINTIFFS' JOINT EXHIBIT LIST

<u>Trial Exhibit No.</u>	<u>Doc Date</u>	<u>Description</u>	<u>Joint Appendix Range/Deposition Exhibit Reference</u>	<u>Bates Range</u>	<u>Admission Status</u>
PX0001	4/25/2014	Declaration of Kay Gordon Brandon	JA0001 - JA0009		Admitted (PI Stipulation)
PX0002	5/15/2014	Declaration of Sarah Bufkin	JA0010 - JA0013		Admitted (PI Stipulation)
PX0003	4/25/2014	Declaration of Bessie Carrington	JA0014 - JA0021		Admitted (PI Stipulation)
PX0004	4/28/2014	Declaration of Masac Dorlouis	JA0022 - JA0029		Admitted (PI Stipulation)
PX0005	5/1/2014	Declaration of Plaintiff Rosanell Eaton	JA0030 - JA0037		Admitted (PI Stipulation)
PX0006	5/14/2014	Declaration of Plaintiff Armenta Eaton	JA0038 - JA0048		Admitted (PI Stipulation)
PX0007	5/14/2014	Declaration of Nicole Little	JA0049 - JA0051		Admitted (PI Stipulation)
PX0008	4/25/2014	Declaration of Renee Michaux	JA0052 - JA0060		Admitted (PI Stipulation)
PX0009	4/27/2014	Declaration of Melvin Montford	JA0061 - JA0067		Admitted (PI Stipulation)
PX0010	5/16/2014	Declaration of NAACP	JA0068 - JA0085		Admitted (PI Stipulation)
PX0011	4/29/2014	Declaration of Plaintiff Maria Teresa Unger Palmer	JA0086 - JA0095		Admitted (PI Stipulation)
PX0012	4/28/2014	Declaration of Bob Phillips	JA0096 - JA0110		Admitted (PI Stipulation)
PX0013	4/28/2014	Declaration of Octavia Rainey	JA0111 - JA0117		Admitted (PI Stipulation)
PX0014	4/24/2014	Declaration of Hugh Stohler	JA0118 - JA0126		Admitted (PI Stipulation)
PX0015	4/28/2014	Declaration of Goldie Wells	JA0127 - JA0134		Admitted (PI Stipulation)
PX0016	4/24/2014	Declaration of Gary Bartlett	JA0135 - JA0158		Admitted (PI Stipulation)
PX0017	4/23/2014	Declaration of Henry M. Michaux	JA0159 - JA0176		Admitted (PI Stipulation)
PX0018	5/1/2014	Declaration of Joshua Stein	JA0177 - JA0215		Admitted (PI Stipulation)
PX0019	4/15/2014	Declaration of George Gilbert	JA0216 - JA0233		Admitted (PI Stipulation)
PX0020	4/28/2014	Declaration of Alma Adams	JA0234 - JA0247		Admitted (PI Stipulation)
PX0021	5/8/2014	Declaration of Daniel T. Blue, Jr.	JA0248 - JA0258		Admitted (PI Stipulation)
PX0022	5/9/2014	Declaration of Larry D. Hall	JA0259 - JA0268		Admitted (PI Stipulation)
PX0023	4/29/2014	Declaration of Earline Parmon	JA0269 - JA0286; Parmon Dep. Ex. 155		Admitted (PI Stipulation)
PX0024	4/24/2014	Declaration of Shelly Willingham	JA0287 - JA0296		Admitted (PI Stipulation)
PX0025	3/26/2014	Declaration of Rick Glazier	JA0297 - JA0320; Glazier Dep. Ex. 150		Admitted (PI Stipulation)
PX0026	4/1/2014	Declaration of Mary Price Taylor Harrison	JA0321 - JA0336		Admitted (PI Stipulation)
PX0027	4/24/2014	Declaration of Kenneth Goodman	JA0337 - JA0351		Admitted (PI Stipulation)
PX0028	4/2/2014	Declaration of Floyd McKissick	JA0352 - JA0370		Admitted (PI Stipulation)
PX0029	4/29/2014	Declaration of Eleanor Kinnaird	JA0371 - JA0383		Admitted (PI Stipulation)
PX0030	5/14/2014	Declaration of Angela R. Bryant	JA0384 - JA0393		Admitted (PI Stipulation)
PX0031	3/25/2014	Declaration of Grier Martin	JA0394 - JA0412		Admitted (PI Stipulation)
PX0032	4/16/2014	Declaration of Jacqueline Taylor	JA0413 - JA0419		Admitted (PI Stipulation)
PX0033	4/16/2014	Declaration of Marilyn Harris	JA0420 - JA0426		Admitted (PI Stipulation)
PX0034	4/28/2014	Declaration of Harry L. Sawyer	JA0427 - JA0433		Admitted (PI Stipulation)
PX0035	4/29/2014	Declaration of Ion V. Sancho	JA0434 - JA0445		Admitted (PI Stipulation)
PX0036	4/27/2014	Declaration of Dawson Blaire Gould	JA0446 - JA0452		Admitted (PI Stipulation)

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PX0040	5/2/2014	Paul Gronke Amended Expert Report and Sur-Rebuttal Report	JA0591 - JA0684		Admitted (PI Stipulation)
PX0041	4/11/2014 and 5/2/2014	Allan Lichtman Expert Report and Sur-Rebuttal Report	JA0685 - JA0778		Admitted (PI Stipulation)
PX0042	5/2/2014	Charles Stewart Expert Report and Sur-Rebuttal Report	JA0779 - JA1035		Admitted (PI Stipulation)
PX0043	4/11/2014	Lorraine Minnite Expert Report	JA1036 - JA1092		Admitted (PI Stipulation)
PX0044	4/11/2014 and 5/2/2014	Barry Burden Expert Report and Sur-Rebuttal Report	JA1093 - JA1141		Admitted (PI Stipulation)
PX0045	4/10/2014	Cynthia Duncan Expert Report	JA1142 - JA1175		Admitted (PI Stipulation)
PX0046	4/10/2014	J. Morgan Kousser Report	JA1176 - JA1246		Admitted (PI Stipulation)
PX0047	4/11/2014 and 5/2/2014	Steven Lawson Expert Report and Sur-Rebuttal Report	JA1247 - JA1337		Admitted (PI Stipulation)
PX0048	4/11/2014 and 5/2/2014	James Leloudis Expert Report and Sur-Rebuttal Report	JA1338 - JA1399		Admitted (PI Stipulation)
PX0049	4/11/2014	Theodore Allen Expert Report	JA1400 - JA1428		Admitted (PI Stipulation)
PX0050	4/11/2014	Peter Levine, Seth Avakian, and Kei Kawashima-Ginsberg Expert Report	JA1429 - JA1467		Admitted (PI Stipulation)
PX0051	2/13/1997	State Board of Elections report re Traffic Jam: Election Day Long Lines	JA1468 - JA1475; Strach Dep. Ex. 11	SBE-P-00018382 - SBE-P-00018389	Admitted (PI Stipulation)
PX0052		<i>Distribution of Licensed Drivers- 2006 by Sex and Percentage in Each Age Group and Relation to Population</i> , a report of the US Department of Transportation Federal Highway Administration	JA1476 - JA1523		Admitted (PI Stipulation)
PX0053	7/14/2008	Letter from Stevie Lawrence to Larry Shaw re Early Voting for Fayetteville State University Students	JA1524		Admitted (PI Stipulation)
PX0054	10/30/2008	State Board of Elections Memorandum to County Board of Elections re One-Stop Absentee Voting Hours - November 1, 2008 (2008-25)	JA1525	SBE-P-00063178	Admitted (PI Stipulation)
PX0055	11/3/2008	<i>Voting Rights Watch: NAACP Wants Probe After Casket with Obama Picture is Displayed N.C. Polling Station</i> , Institute for Southern Studies article	JA1526 - JA1527		Admitted (PI Stipulation)
PX0056	3/31/2009	State Board of Elections Report on Implementation of Same Day Registration	JA1528 - JA1536; Strach Dep. Ex. 42	SBE00022907 - SBE00022915	Admitted (PI Stipulation)
PX0057		Same Day Registration Summary: 2010 General Election	JA1537; Strach Dep. Ex. 44	SBE00024315	Admitted (PI Stipulation)
PX0058	2/9/2011	Memorandum re State Board of Elections and North Carolina Department of Motor Vehicles Voter Registration Database Identification Analysis	JA1538 - JA1539; Strach Dep. Ex. 46	SBE00000218 - SBE00000219	Admitted (PI Stipulation)
PX0059	2/16/2011	Memorandum re State Board of Elections and North Carolina Department of Motor Vehicles Voter Registration Database Identification Analysis	JA1540; Burris Dep. Ex. 73	SBE-P-00012556	Admitted (PI Stipulation)
PX0060	5/18/2011	State Board of Elections Memorandum re House Bill 658	JA1541 - JA1543; Strach Dep. Ex. 17	SBE-P-00052603 - SBE-P-00052605	Admitted (PI Stipulation)
PX0061	8/28/2012	State Board of Elections Numbered Memorandum re Proof of Residence for Same Day Registrants (2012-20)	JA1544		Admitted (PI Stipulation)
PX0062	10/22/2012	State Board of Elections Numbered Memorandum re Recommendations and Reminders to Facilitate the 2012 One- Stop Voting Process (2012-22)	JA1545 - JA1546; Strach Dep. Ex. 13	SBE00003610 - SBE00003611	Admitted (PI Stipulation)
PX0063	10/23/2012	State Board of Elections Numbered Memorandum re 2012 One-Stop Voting Process (2012-23)	JA1547; Strach Dep. Ex. 14	SBE00003612	Admitted (PI Stipulation)
PX0064	11/2/2012	<i>Justice Department to Monitor Polls in 23 States on Election Day</i> , U.S. Department of Justice Press Release	JA1548 - JA1550		Admitted (PI Stipulation)
PX0065		<i>All Together Now: Collaboration and Innovation for Youth Engagement</i> , A report of the Commission on Youth Voting and Civic Knowledge	JA1551 - JA1610		Admitted (PI Stipulation)
PX0066	1/7/2013	State Board of Elections 2013 Department of Motor Vehicles Identification Analysis	JA1611 - JA1613	SBE-P-00026576 - SBE-P-00026578	Admitted (PI Stipulation)

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PX0067	1/30/2013	State Board of Elections Analysis of Same Day Registrations in 2012 Primary and General Election	JA1614 - JA1620; Strach Dep. Ex. 45	SBE-P-00045947 - SBE-P-00045953	Admitted (PI Stipulation)
PX0068	2/11/2013	State Board of Elections Data from the 2012 Elections: Mail Verification Analysis of New Voters	JA1621 - JA1626; Strach Dep. Ex. 41		Admitted (PI Stipulation)
PX0069		Emails from Sponsors of H.B. 589 to SBOE re: Data on Photo ID, One-Stop and Provisional Voting by Race, Age, Gender	JA1627 - JA1668; Burris Dep. Ex. 74		Admitted (PI Stipulation)
PX0070	3/5/2013	Email from V. Degraffenreid to G. Bartlett, J. McLean and M. Burris attaching January 2013 DMV ID Matching Report and March 2013 Supplemental Report	JA1669 - JA1675; Strach Dep. Ex.47	SBE-P-00058371 - SBE-P-00058377	Admitted (PI Stipulation)
PX0071		State Board of Elections Memorandum & Attachments to House Elections Committee and House Appropriations Subcommittee on General Government	JA1676 - JA1709; Strach Dep. Ex. 16	SBE-P-00047867 - SBE-P-00047900	Admitted (PI Stipulation)
PX0072	3/12/2013	Email from V. Degraffenreid to Representatives Warren, Murry, and Samuelson re Request	JA1710 - JA1781; Strach Dep. Ex. 49	SBE-P-00058225 - SBE-P-00058296	Admitted (PI Stipulation)
PX0073	3/13/2013	Email from G. Bartlett to S. Mooneyham re Supplemental Tables for Representative Warren	JA1782 - JA1785	SBE-P-00014755 - SBE-P-00014758	Admitted (PI Stipulation)
PX0074		Spreadsheet of Racial Data Prepared at the Request of Rep. D. Lewis	JA1786 - JA1797	SBE-P-00021669	Admitted (PI Stipulation)
PX0075	4/1/2013	State Board of Elections Numbered Memos 4-578 to 4-596 re Early Voting Project	JA1798 - JA1807		Admitted (PI Stipulation)
PX0076	4/3/2013	<i>Bill Cook Seeks to Put Integrity Back in Our Elections Procedures</i> , Beaufort Observer article	JA1808 - JA1812		Admitted (PI Stipulation)
PX0077	4/4/2013	<i>House Republicans File Voter ID Bill</i> , WRAL.com article	JA1813 - JA1816		Admitted (PI Stipulation)
PX0078	4/8/2013	Email from E. Churchill to G. Bartlett, J. McLean, V. Degraffenreid, and M. Burris re Absentee Ballots	JA1817	SBE00017477	Admitted (PI Stipulation)
PX0079	4/10/2013	<i>NC Bills Could Cut Early Voting, Affect College Students</i> , Lumina News Article	JA1818 - JA1820		Admitted (PI Stipulation)
PX0080	4/17/2013	Email from V. Degraffenreid to V. Degraffenreid re ID Analysis attaching DMV ID Matching Report	JA1821 - JA1830; Strach Dep. Ex. 48	SBE-P-00002575; SBE-P-00002599 - SBE-P-00002607	Admitted (PI Stipulation)
PX0081	6/25/2013	<i>NC Voter ID Bill Moving Ahead with Supreme Ruling</i> , article	JA1831 - JA1832		Admitted (PI Stipulation)
PX0082	7/1/2013	Email from G. McCue to K. Strach attaching One-Stop Survey Report Data	JA1833 - JA1867; Strach Dep. Ex. 19	SBE-P-00048154 - SBE-P-000048155	Admitted (PI Stipulation)
PX0083	7/1/2013	Email from G. McCue to K. Strach attaching Analysis of Reducing One-Stop Period: House Bill 451	JA1868 - JA1872; Strach Dep. Ex. 20	SBE-P-00054917 - SBE-P-00054921	Admitted (PI Stipulation)
PX0084	7/18/2013	Press Release re Senate Releases Photo ID Proposal	JA1873	SBE00000002	Admitted (PI Stipulation)
PX0085	7/24/2013	Press Release re Senate Approves Bill Requiring Photo ID to Vote	JA1874	SBE00000001	Admitted (PI Stipulation)
PX0086	7/25/2013	Widespread Voter Fraud Not An Issue in NC, Data Shows, a WKRG.com article	JA1875 - JA1877		Admitted (PI Stipulation)
PX0087	7/29/2013	<i>Widespread Voter Fraud Not an Issue in NC</i> , a Report by Fox	JA1878 - JA1879		Admitted (PI Stipulation)
PX0088	8/4/2013	Email from V. Degraffenreid to B. Webb re House Bill 589 & Preregistrations	JA1880; Strach Dep. Ex. 56	SBE-P-00006825	Admitted (PI Stipulation)
PX0089	8/8/2014	Email from J. Felts to R. Tronovitch and K. Genardo attaching Election Reform One-Pager	JA1881 - JA1883	GOV00001286 - GOV00001288	Admitted (PI Stipulation)
PX0090	8/8/2013	Email from J. Felts to R. Tronovitch and K. Genardo attaching Election reform One-Pager	JA1884 - JA1885	GOV00001296 - GOV00001297	Admitted (PI Stipulation)
PX0091	8/21/2013	<i>Blust Says Voting Changes are Meant to Strike a Proper Balance</i> , Doug Clark article	JA1886 - JA1889		Admitted (PI Stipulation)
PX0092	8/30/2013	Email from K. Strach to T. Forsberg re Registration for 18 Year Old	JA1890; Strach Dep. Ex. 57	SBE-P-00025090	Admitted (PI Stipulation)
PX0093	11/14/2013	Email from V. Degraffenreid to B. Webb re Change Request	JA1891; Strach Dep. Ex. 59	SBE-P-00009672	Admitted (PI Stipulation)
PX0094	11/25/2013	Email from B. Webb to V. Degraffenreid attaching H.B. 589 (VIVA)	JA1892; Strach Dep. Ex. 60	SBE-P-00001459	Admitted (PI Stipulation)
PX0095	12/18/2013	Presentation re 2013 Election Directors Conference: VIVA Update	JA1893 - JA1899		Admitted (PI Stipulation)
PX0096	Apr-14	State Board of Elections Presentation to Joint Legislative Elections Oversight Committee	JA1900 - JA1957; Strach Dep. Ex. 30		Admitted (PI Stipulation)
PX0097	5/13/2014	<i>Voter Registration in NC</i> , a page from the North Carolina State Board of Elections Website	JA1958 - JA1959		Admitted (PI Stipulation)

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PX0098	5/13/2014	<i>Changing Your Voter Registration in North Carolina</i> , a page from the North Carolina State Board of Elections Website	JA1960 - JA1961		Admitted (PI Stipulation)
PX0099	5/15/2014	Declaration of Peyton McCrary	JA1962 - JA1975		Admitted (PI Stipulation)
PX0100		Survey Report re Requests for Reduction of Cumulative Hours of One-Stop Voting, 2014 Primary	JA1976 - JA1978; Strach Dep. Ex. 27		Admitted (PI Stipulation)
PX0101		Mecklenburg County Board of Elections Early In-Person Voting Project Report	JA1979 - JA2002		Admitted (PI Stipulation)
PX0102		Southern Coalition for Social Justice Graph re Total Accepted One-Stop Early Votes	JA2003 - JA2006	LEG00000002 - LEG00000005	Admitted (PI Stipulation)
PX0103		<i>Race as a Tool in the Struggle for Political Mastery: North Carolina's 'Redemption' Revisited 1870-1905 and 2011-2013</i> , a Law and Inequality article	JA2007 - JA2098		Admitted (PI Stipulation)
PX0104		<i>Governor McCrory Signs Popular Voter ID into Law</i> , a Governor P. McCrory Newsroom Article	JA2099 - JA2100	GOV00000001 - GOV00000002	Admitted (PI Stipulation)
PX0105	4/4/2013	HB 589 as filed	JA2101 - JA2112	SBE00000232 - SBE00000243	Admitted (PI Stipulation)
PX0106	4/8/2013	HB 589 version 5	JA2113 - JA2128	SBE00000441 - SBE00000456	Admitted (PI Stipulation)
PX0107	7/23/2013	HB 589 version 6	JA2129 - JA2185	SBE00000457 - SBE00000513	Admitted (PI Stipulation)
PX0108	7/24/2013	HB 589 version 7	JA2186 - JA2241	SBE00000514 - SBE00000569	Admitted (PI Stipulation)
PX0109	7/26/2013	HB 589 as ratified	JA2242 - JA2290	SBE00000286 - SBE00000334	Admitted (PI Stipulation)
PX0110		HB 589 Session Law version	JA2291 - JA2339	SBE00000335 - SBE00000383	Admitted (PI Stipulation)
PX0111	7/25/2013	HB 589 House Amendment 7	JA2340	SBE00001685	Admitted (PI Stipulation)
PX0112	7/25/2013	HB 589 House Amendment 8	JA2341	SBE00001686	Admitted (PI Stipulation)
PX0113	7/25/2013	HB 589 House Amendment 10	JA2342	SBE00001676	Admitted (PI Stipulation)
PX0114	7/24/2013	HB 589 Senate Amendment 2	JA2343	SBE00002332	Admitted (PI Stipulation)
PX0115	7/24/2013	HB 589 Senate Amendment 4	JA2344 - JA2345	SBE00002336 - SBE00002337	Admitted (PI Stipulation)
PX0116	7/24/2013	HB 589 Senate Amendment 7	JA2346	SBE00002342	Admitted (PI Stipulation)
PX0117	7/24/2013	HB 589 Senate Amendment 8	JA2347 - JA2348	SBE00002343 - SBE00002344	Admitted (PI Stipulation)
PX0118	7/24/2013	HB 589 Senate Amendment 9	JA2349 - JA2350	SBE00002345 - SBE00002346	Admitted (PI Stipulation)
PX0119	7/24/2013	HB 589 Senate Amendment 11	JA2351 - JA2352	SBE00002347 - SBE00002348	Admitted (PI Stipulation)
PX0120	7/24/2013	HB 589 Senate Amendment 14	JA2353	SBE00002351	Admitted (PI Stipulation)
PX0121		HB 589 Bill History (2013)	JA2354 - JA2355	SBE00000190 - SBE00000203	Admitted (PI Stipulation)
PX0122		VIVA House Floor Votes	JA2356 - JA2369		Admitted (PI Stipulation)
PX0123	4/24/2013	HB 589 House Roll Call Vote	JA2370		Admitted (PI Stipulation)
PX0124	7/25/2013	HB 589 Senate Roll Call Vote	JA2371		Admitted (PI Stipulation)
PX0125	7/25/2013	HB 589 House Roll Call Vote	JA2372		Admitted (PI Stipulation)
PX0126	7/25/2013	HB 589 Fiscal Note	JA2373 - JA2387	SBE00000260 - SBE00000274	Admitted (PI Stipulation)
PX0127	3/12/2013	House Election Committee Transcript of Proceedings (Excerpt)	JA2388 - JA2392	SBE00000698 - SBE00000702	Admitted (PI Stipulation)
PX0128	3/13/2013	House Election Committee Transcript of Proceedings (Excerpt)	JA2393 - JA2416	SBE00000897, SBE00000900 - SBE00000908, SBE00000918, SBE00000922 - SBE00000934	Admitted (PI Stipulation)
PX0129	4/3/2013	House Election Committee Transcript of Proceedings (Excerpt)	JA2417 - JA2423	SBE00001540, SBE00001600 - SBE00001601, SBE00001608 - SBE00001609, SBE00001617 - SBE00001618	Admitted (PI Stipulation)
PX0130	4/10/2013	House Election Committee Transcript of Public Hearing on Voter Identification (Excerpt)	JA2424 - JA2428	SBE00001070 - SBE00001074	Admitted (PI Stipulation)
PX0131	4/10/2013	House Election Committee Transcript of Proceedings (Excerpt)	JA2429 - JA2431	SBE00001018, SBE00001056, SBE00001058	Admitted (PI Stipulation)
PX0132	4/17/2013	House Election Committee Transcript of Proceedings (Excerpt)	JA2432 - JA2443	SBE00001261, SBE00001279, SBE00001293, SBE00001302 - SBE00001305, SBE00001322 - SBE00001326	Admitted (PI Stipulation)

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PX0133	4/23/2013	House Appropriations Committee Transcript of Proceedings (Excerpt)	JA2444 - JA2445	SBE00000613, SBE00000647	Admitted (PI Stipulation)
PX0134	4/24/2013	House Floor Session Transcript of the Proceedings (Excerpt)	JA2446 - JA2451	SBE00001688, SBE00001771, SBE00001778 - SBE00001779, SBE00001864 - SBE00001865	Admitted (PI Stipulation)
PX0135	7/23/2013	Senate Rules Committee Transcript of Proceedings (Excerpt)	JA2452 - JA2466	SBE00001997 - SBE00001999, SBE00002018, SBE00002026 - SBE00002027, SBE00002032 - SBE00002033, SBE00002037 - SBE00002039, SBE00002049 - SBE00002050, SBE00002071 - SBE00002072	Admitted (PI Stipulation)
PX0136	7/24/2013	Senate Floor Session Transcript of Proceedings (Excerpt)	JA2467 - JA2483	SBE00002186, SBE00002189 - SBE00002192, SBE00002196, SBE00002202 - SBE00002203, SBE00002213 - SBE00002215, SBE00002222, SBE00002263, SBE00002269, SBE00002293, SBE00002318 - SBE00002319	Admitted (PI Stipulation)
PX0137	7/25/2013	Senate Floor Session Transcript of Proceedings (Excerpt)	JA2484 - JA2504	SBE00002084, SBE00002090, SBE00002110 - SBE00002118, SBE00002128, SBE00002134 - SBE00002139, SBE00002164, SBE00002183 - SBE00002184	Admitted (PI Stipulation)
PX0138	7/25/2013	House Floor Session, Transcript of Proceedings	JA2505 - JA2626	SBE00001869 - SBE00001990	Admitted (PI Stipulation)
PX0140	4/25/2001	North Carolina House HB 977 Transcript Roll Call Votes (2001)	JA2627		Admitted (PI Stipulation)
PX0141	7/18/2001	North Carolina HB 831 House Roll Call Votes (2001)	JA2628		Admitted (PI Stipulation)
PX0142	7/25/2001	North Carolina HB 831 Senate Roll Call Vote (2001)	JA2629		Admitted (PI Stipulation)
PX0143	7/25/2001	North Carolina SB 836 Senate Roll Call Vote (2001)	JA2630		Admitted (PI Stipulation)
PX0144	3/1/2005	North Carolina SB 133 Senate Roll Call Vote (2005)	JA2631		Admitted (PI Stipulation)
PX0145	2/22/2005	North Carolina SB 133 House Roll Call Vote (2005)	JA2632		Admitted (PI Stipulation)
PX0146	3/2/2005	North Carolina Session Law 2005-2 (Senate Bill 133)	JA2633 - JA2640		Admitted (PI Stipulation)
PX0147	2007	North Carolina HB 91 Bill History (2007)	JA2641 - JA2642		Admitted (PI Stipulation)
PX0148	7/11/2007	North Carolina HB 91 House Roll Call Vote (2007)	JA2643		Admitted (PI Stipulation)
PX0149	7/11/2007	North Carolina HB 91 Senate Roll Call Vote (2007)	JA2644		Admitted (PI Stipulation)
PX0150	7/27/2007	North Carolina Session Law 2007-253 (House Bill 91)	JA2645 - JA2647; Strach Dep. Ex. 43	SBE00022716 - SBE00022718	Admitted (PI Stipulation)
PX0151	4/4/2013	North Carolina SB 667	JA2648 - JA2649		Admitted (PI Stipulation)
PX0152		Rule 10(b) of the 2013 North Carolina General Assembly House Rules	JA2650 - JA2652		Admitted (PI Stipulation)
PX0153	2013-2014	North Carolina Senate Demographics for the 150th Session	JA2653 - JA2654		Admitted (PI Stipulation)
PX0154	2013-2014	North Carolina House of Representative Demographics for the 150th Session	JA2655 - JA2655		Admitted (PI Stipulation)
PX0155	8/7/1965	Determination of the Attorney General Pursuant to Section 4(b)(1) of the Voting Rights Act of 1965 (30 Federal Register 9897)	JA2656		Admitted (PI Stipulation)
PX0156	1/4/1966	Department of Commerce Determination of the Director Regarding Voting Rights (31 Fed. Reg. 19)	JA2657		Admitted (PI Stipulation)
PX0157	3/2/1966	Department of Commerce Determination of the Director Regarding Voting Rights (31 Fed. Reg. 3317)	JA2658 - JA2709		Admitted (PI Stipulation)
PX0158	3/29/1966	Department of Commerce Determination of the Director Regarding Voting Rights (31 Fed. Reg. 5080)	JA2710 - JA2711		Admitted (PI Stipulation)

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PX0159	3/23/1971	Excerpts from the 117th House of Representatives' Congressional Record	JA2712 - JA2720		Admitted (PI Stipulation)
PX0160	1971	S. Rep. No. 92-26	JA2721 - JA2738		Admitted (PI Stipulation)
PX0161	4/21/1992	U.S. Department of Justice Objection Letter	JA2739 - JA2741		Admitted (PI Stipulation)
PX0162	11/16/1993	U.S. Department of Justice Objection Letter	JA2742 - JA2744		Admitted (PI Stipulation)
PX0163	10/19/2011	<i>Allen v. City of Evergreen, Alabama (1:13-cv-00107)</i> Order	JA2745 - JA2750		Admitted (PI Stipulation)
PX0164	4/30/2012	U.S. Department of Justice Objection Letter	JA2751 - JA2755		Admitted (PI Stipulation)
PX0165	1/13/2014	<i>US v. Alameda County, Cal. (3:11-cv-03262)</i> Consent Decree, Judgment, and Order	JA2756 - JA2775		Admitted (PI Stipulation)
PX0166	6/26/2014	Second Declaration of Gary Bartlett	JA2776 - JA2781		Admitted (PI Stipulation)
PX0167	6/27/2014	Second Sur Reply Declaration of Paul Gronke	JA2782 - JA2789		Admitted (PI Stipulation)
PX0168	6/28/2014	Supplemental Declaration of Charles Stewart	JA2790 - JA2807		Admitted (PI Stipulation)
PX0169	6/29/2014	Supplemental Declaration of Barry Burden	JA2808 - JA2814		Admitted (PI Stipulation)
PX0170	6/29/2014	Declaration of Lorraine Minnite	JA2815 - JA2816		Admitted (PI Stipulation)
PX0171	6/30/2014	Declaration of Allan Lichtman	JA2817 - JA2818		Admitted (PI Stipulation)
PX0172	6/30/2014	Declaration of James Leloudis	JA2819 - JA2820		Admitted (PI Stipulation)
PX0173	6/30/2014	Declaration of Jacqueline Willoughby Cannon	JA2821 - JA2824		Admitted (PI Stipulation)
PX0174	6/30/2014	Declaration of Samuel Cannon	JA2825 - JA2827		Admitted (PI Stipulation)
PX0175	6/30/2014	Declaration of Shineka Marie Jones	JA2828 - JA2830		Admitted (PI Stipulation)
PX0176	6/30/2014	Declaration of Rev. Jimmie R. Hawkins	JA2831 - JA2844		Admitted (PI Stipulation)
PX0177	6/30/2014	Declaration of Lorrie A. Fleming	JA2845 - JA2847		Admitted (PI Stipulation)
PX0182		Written Comments of Cherie Poucher Before the Elections Assistance Commission	JA3062 - JA3078		Admitted (PI Stipulation)
PX0183	1/20/2011	Email from J. McLean to S. Nichols re Legislative request for information - Voter identification and Voter Registration Cards	JA3079 - JA3083	SBE-P-00158385 - SBE-P-00158389	Admitted (PI Stipulation)
PX0184	1/25/2012	Email from M. Burris to E. Churchill re 2008 statewide and federal stats	JA3084 - JA3112	SBE-P-00150554 - SBE-P-00150556	Admitted (PI Stipulation)
PX0185	2/24/2012	Email from E. Churchill to M. Burris re 2008 statewide and federal stats	JA3113 - JA3116	SBE-P-00149674 - SBE-P-00149677	Admitted (PI Stipulation)
PX0186	10/22/2012	Email from G. Cohen to M. Burris re new voter registration	JA3117 - JA3119	SBE-P-00150533 - SBE-P-00150535	Admitted (PI Stipulation)
PX0187	3/13/2013	Email from R. Starling to J. McLean re Interview of Gary Bartlett	JA3120 - JA3124	SBE-P-00158313 - SBE-P-00158317	Admitted (PI Stipulation)
PX0188	3/18/2013	Email from V. Degraffenreid to G. Bartlett attaching Agenda for HB589 Sponsor Meeting	JA3125 - JA3126	SBE-P-00149001 - SBE-P-00149002	Admitted (PI Stipulation)
PX0189	3/28/2013	Email and letter attachment from Rep. Lewis to G. Bartlett re Voter Registration Database and DMV Database Analysis	JA3127 - JA3137	SBE-P-00148555 - SBE-P-00148565	Admitted (PI Stipulation)
PX0190	4/4/2013	Email from R. Starling re DMV Audit Items	JA3138 - JA3141	SBE-P-00158285 - SBE-P-00158288	Admitted (PI Stipulation)
PX0191	4/11/2013	Email from R. Starling to T. Farr re Absentee Ballots	JA3142 - JA3147	SBE-P-00148322 - SBE-P-00148327	Admitted (PI Stipulation)
PX0192	4/11/2013	Letter from SBOE to Rep. Lewis re Voter Registration Database and DMV Database Analysis	JA3148 - JA3166	SBE-P-00148536 - SBE-P-00148554	Admitted (PI Stipulation)
PX0193	4/12/2013	Email from T. Farr to M. Burris re Additional Analysis	JA3167 - JA3169	SBE-P-00158046 - SBE-P-00158049	Admitted (PI Stipulation)
PX0194	4/12/2013	Email from N. Baddour to M. Burris re Information Request	JA3170 - JA3230	SBE-P-00149017 - SBE-P-00149024	Admitted (PI Stipulation)
PX0195	4/16/2013	Email from M. Burris to R. Starling re Additional Analysis	JA3231 - JA3246	SBE-P-00158141 - SBE-P-00158145	Admitted (PI Stipulation)
PX0196	4/17/2013	Email from R. Starling to G. Bartlett re Comments on PCS	JA3247 - JA3248	SBE-P-00148300 - SBE-P-00148301	Admitted (PI Stipulation)
PX0197	7/18/2013	Email from N. Baddour to K. Strach re HB589-CSLB-110	JA3249 - JA3264	SBE-P-00148333; SBE-P-00002088 - SBE-P-00002102	Admitted (PI Stipulation)
PX0198	7/25/2013	Email from K. Strach to Rep. Lewis re SDR	JA3265 - JA3284	SBE-P-00046673 - SBE-P-00046683	Admitted (PI Stipulation)
PX0199	5/5/2014	Letter from M. Elias to A. Peters and T. Farr re DMV Registration of Voters Who Will be 18 By the Next General Election	JA3285 - JA3286		Admitted (PI Stipulation)
PX0200	5/16/2014	Letter from A. Peters to M. Elias re DMV Registration	JA3287 - JA3288		Admitted (PI Stipulation)
PX0201	4/2/2013	S.B. 666 as Filed	JA3289 - JA3295		Admitted (PI Stipulation)
PX0202	7/23/2013	Senate Debate on HB 589 VIVA/Election Reform, Rules Meeting	JA3296 - JA3373	SBE00001997 - SBE00002074	Admitted (PI Stipulation)
PX0203	2013-2014	Bill History - H.B. 451 (2013-2014 Session)	JA3374		Admitted (PI Stipulation)
PX0204	2013-2014	Bill History - H.B. 913 (2013-2014 Session)	JA3375		Admitted (PI Stipulation)
PX0205	2013-2014	Bill History - S.B. 428 (2013-2014 Session)	JA3376		Admitted (PI Stipulation)

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PX0206	2013-2014	Bill History - S.B. 666 (2013-2014 Session)	JA3377		Admitted (PI Stipulation)
PX0207	2003	HB 3 Summary/S.L. 2003-434			Admitted (PI Stipulation)
PX0208	11/25/2003	HB 3 Roll Call for Concurrence Vote			Admitted (PI Stipulation)
PX0209	11/5/2013	Mecklenburg County Board of Elections Election Day Summary	Dickerson Dep. Ex. 161		Admitted (PI Stipulation)
PX0210	9/13/2011	Statistics for First and Last Vote	Dickerson Dep. Ex. 163		Admitted (PI Stipulation)
PX0211		2014-2010 Primary Data, native file available at http://democracy-nc.org/downloads/2014-2010PrimaryBlackVoters.xls			Admitted (PI Stipulation)
PX0212		North Carolina Voter Registration Application	Strach Dep. Ex. 171		Admitted (PI Stipulation)
PX0213		North Carolina State Absentee Ballot Request Form	Strach Dep. Ex. 173		Admitted (PI Stipulation)
PX0214	5/4/2010	One-Stop Voting Sites for the May 4, 2010 Primary Election	Strach Dep. Ex. 174		Admitted (PI Stipulation)
PX0215	4/25/2014	Declaration of Janet R. Thornton	Thornton Dep. Ex. 123		Admitted (PI Stipulation)
PX0216	7/25/2013	Legislative Fiscal Note, HB 589, Seventh Ed.	Glazier Dep. Ex. 151		Admitted (PI Stipulation)
PX0217	7/26/2013	Letter from R. Cooper to P. McCrory			Admitted (PI Stipulation)
PX0218		North Carolina State Board of Elections Data Files, produced by SBE on Feb. 3, 2014			Admitted (PI Stipulation)
PX0219		North Carolina State Board of Elections Online Database Files, available at http://www.ncsbe.gov/ncsbe/data-statistics			Admitted (PI Stipulation)
PX0220	7/6/2014	Email from A. Peters to J. Devaney	Webb Dep. Ex. 223		Admitted (PI Stipulation)
PX0221	1/18/2005	Analysis of Out-of-Precinct Provisional Votes by Race in NC General Election, Nov. 2004			Admitted (PI Stipulation)
PX0222		Screenshot of FTP Directory, SBOE Numbered Memos			Admitted (PI Stipulation)
PX0223	9/13/2013	SBOE Numbered Memo 2013-02	Strach Dep. Ex. 55	SBE-P-00001479 - SBE-P-00001480	Admitted (PI Stipulation)
PX0224	1/21/2011	SBOE Response to Voter Fraud Inquiry	Strach Dep. Ex. 51	SBE-P-00043362 - SBE-P-00043366	Admitted (PI Stipulation)
PX0225	4/16/2014	Plaintiffs' Joint Notice of Rule 30(b)(6) Deposition of the North Carolina State Board of Election	Strach Dep. Ex. 1		Admitted (PI Stipulation)
PX0226	7/10/2014	Declaration of Louis M. Duke	Duke Dep. Ex. 1		Admitted (PI Stipulation)
PX0227	7/10/2014	Declaration of Josue Berduo			Admitted (PI Stipulation)
PX0228	7/11/2014	Declaration of Nancy J. Lund	Lund Dep. Ex. 1		Admitted (PI Stipulation)
PX0229	2/12/2015	Expert Report of Barry C. Burden, Ph.D.			Admitted (PI Stipulation)
PX0230	2/12/2015	Expert Report of James L. Leloudis II, Ph.D.			Admitted (PI Stipulation)
PX0231	2/12/2015	Expert Report of Allan J. Lichtman, Ph.D.			Admitted (PI Stipulation)
PX0232	2/12/2015	Expert Report of Lorraine C. Minnite, Ph.D.			Admitted (PI Stipulation)
PX0233	2/12/2015	Expert Report and Declaration of Theodore T. Allen, Ph.D.			Admitted (PI Stipulation)
PX0234	2/12/2015	Expert Report and Declaration of Paul W. Gronke, Ph.D.			Admitted (PI Stipulation)
PX0235	2/12/2015	Expert Report of D. Sunshine Hillygus, Ph.D. and John B. Holbein, M.A.			Admitted (PI Stipulation)
PX0236	2/12/2015	Expert Report of Drs. Peter Levine and Kei Kawashima-Ginsberg			Admitted (PI Stipulation)
PX0237	2/12/2015	Declaration of Charles T. Clotfelter, Ph.D.			Admitted (PI Stipulation)
PX0238	2/12/2015	Declaration of Steven F. Lawson, Ph.D.			Admitted (PI Stipulation)
PX0239	2/12/2015	Declaration of Kathryn Summers, Ph.D.			Admitted (PI Stipulation)
PX0240	2/12/2015	Declaration of Lynne Vernon-Feagans, Ph.D.			Admitted (PI Stipulation)
PX0241	2/12/2015	Declaration of Gerald R. Webster, Ph.D.			Admitted (PI Stipulation)
PX0242	2/18/2015	Declaration of Charles H. Stewart III, Ph.D. (Amended)			Admitted (PI Stipulation)
PX0243	3/9/2015	Supplemental Expert Report of Drs. Peter Levine and Kei Kawashima-Ginsberg			Admitted (PI Stipulation)
PX0244	3/24/2015	Surrebuttal Expert Report of Barry C. Burden, Ph.D.			Admitted (PI Stipulation)
PX0245	3/24/2015	Surrebuttal Expert Report of Allan J. Lichtman, Ph.D.			Admitted (PI Stipulation)
PX0246	3/24/2015	Surrebuttal Expert Report and Declaration of Theodore T. Allen, Ph.D.			Admitted (PI Stipulation)
PX0247	3/24/2015	Surrebuttal Expert Report and Declaration of Paul W. Gronke, Ph.D.			Admitted (PI Stipulation)
PX0248	3/24/2015	Surrebuttal Expert Report of Drs. Peter Levine and Kei Kawashima-Ginsberg			Admitted (PI Stipulation)
PX0249	3/24/2015	Surrebuttal Declaration of Charles T. Clotfelter, Ph.D.			Admitted (PI Stipulation)
PX0250	3/24/2015	Surrebuttal Declaration of Steven F. Lawson, Ph.D.			Admitted (PI Stipulation)

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PX0251	3/24/2015	Surrebuttal Declaration of Kathryn Summers, Ph.D.			Admitted (PI Stipulation)
PX0252	3/24/2015	Surrebuttal Declaration of Lynne Vernon-Feagans, Ph.D.			Admitted (PI Stipulation)
PX0253	3/24/2015	Surrebuttal Declaration of Gerald R. Webster, Ph.D.			Admitted (PI Stipulation)
PX0254	3/24/2015	Surrebuttal Report of Charles Stewart III, Ph.D.			Admitted (PI Stipulation)
PX0255	4/1/2015	Webster Corrected Appendix I	Webster Dep. Ex. 3		Admitted (PI Stipulation)
PX0256	4/2/2015	Addendum to February 12, 2015 Declaration of Charles Stewart III, Ph.D.			Admitted (PI Stipulation)
PX0257	6/9/2015	Supplemental Expert Report of Allan J. Lichtman, Ph.D.			Admitted (PI Stipulation)
PX0300		Rosa Johnson Eaton's NC Driver License	R. Eaton Dep. Ex. 1		
PX0301		Rosanell Eaton's NC Driver License	R. Eaton Dep. Ex. 2		
PX0302		Rosanell Eaton Franklin County Voter Card	R. Eaton Dep. Ex. 3		
PX0303		Rosa Nell Johnson Certification of Live Birth	R. Eaton Dep. Ex. 4		
PX0304	4/15/2015	NC Public Voter Search re Anna Martin	Sims Dep. Ex. 451		
PX0305	6/15/2015	First Stipulation re Information in the SEIMS Database			
PX0306	6/15/2015	Second Stipulation re Information in the SEIMS Database: Publically Available Information Accessible Through the North Carolina Public Voter Information Website			
PX0307	5/27/2015	NC Public Voter Information re Emma Janice Carr	Carr Dep. Ex. 1		
PX0308		Photograph of Terrilin Cunningham	Cunningham Dep. Ex. 1		
PX0309	11/4/2014	Printout from Facebook Account for Terrilin Cunningham	Cunningham Dep. Ex. 2		
PX0310	5/27/2015	NC Public Voter Information re Terrilin Claiborne Cunningham	Cunningham Dep. Ex. 3		
PX0311	5/4/2015	NC Public Voter Information re Malcolm Jerome Wilson	Wilson Dep. Ex. 1		
PX0312	10/4/2014	Provisional Voting Application re Malcolm Jerome Wilson	Wilson Dep. Ex. 2		
PX0313		Provisional Voter Instructions	Y. Washington Dep. Ex. 3		
PX0314	5/7/2015	NC Public Voter Information re Gerrick Jamele Suggs	Suggs Dep. Ex. 2		
PX0315		Screenshot of Voter Information re Gerrick Jamele Suggs	Suggs Dep. Ex. 3		
PX0316	1/18/2001	Voter Registration Document re Gerrick Jamele Suggs	Suggs Dep. Ex. 4		
PX0317		Authorization to Vote re Gerrick Jamele Suggs	Suggs Dep. Ex. 5		
PX0318		Provisional Voting Registration/update Form re Gerrick Jamele Suggs	Suggs Dep. Ex. 6		
PX0319	5/1/2008	Application to Register to Vote re Gerrick Jamele Suggs	Suggs Dep. Ex. 7		
PX0320	10/26/2012	North Carolina Voter Registration Application re Gerrick Jamele Suggs	Suggs Dep. Ex. 8		
PX0321	10/31/2014	Provisional Voting Registration / Update Form	Suggs Dep. Ex. 9		
PX0322		Photograph of Carnell Brown's Residence	Brown Dep. Ex. 1		
PX0323	5/11/2010	Copy of Front of Carnell Brown's Identification Card	Brown Dep. Ex. 2		
PX0324	5/11/2010	Copy of Back of Carnell Brown's Identification Card	Brown Dep. Ex. 3		
PX0325	11/4/2014	Provisional Voting Application re Gwendolyn Gail Farrington	Farrington Dep. Ex. 1		
PX0326	11/4/2014	2014 Voting & Election Day Irregularities Incident Report Form re Kelvin Fisher	Fisher Dep. Ex. 1		
PX0327	11/4/2014	Photograph of Long Line in Durham County			
PX0328		NC Public Voter Information re James P. Manley	J. Manley Dep. Ex. 1		
PX0329	6/29/2015	NC Public Voter Information re Annie Mae Manley			
PX0330	11/4/2014	2014 Voting & Election Day Irregularities Incident Report Form filed by Susan Schaffer	Schaffer Dep. Ex. 1	NCSC00006425 - NCSC00006429	
PX0331	5/25/2015	Google Maps Directions from 161 Union Street South #2 to 331 Corban Avenue Southeast	Cunningham Dep. Ex. 4		
PX0332	1/11/2011	NC Driver License re Gerrick Jamele Suggs	Suggs Dep. Ex. 1		
PX0333	5/4/2015	NC Public Voter Information re Kelvin Rodney Fisher	Fisher Dep. Ex. 3		
PX0334	4/24/2013	Email from A. Moretz to Rep. D. Lewis re Fall 2012 Enrollment Report		LEG00024202 - LEG00024203	
PX0335	6/16/2011	Email from D. Wright to V. Degraffenreid attaching Concerns About S47	Strach Dep. Ex. 18	SBE-P-00066805 - SBE-P-00066815	
PX0336	10/23/2014	Email from C. Boyd-Malette to T. McLawhorn re Voter Registration Mismanagement	Boyd-Malette Dep. Ex. 496	DOT00013956 - DOT00013957	
PX0337	8/25/2014	Email from V. Degraffenreid to J. Jones et al. re VIVA Requirements and Direction	Burriss Dep. Ex. 300	SBE00598671 - SBE00598673	
PX0338	10/29/2014	Email from K. Strach to K. Cosner re Upset Voter	Cosner Dep. Ex. 296	SBE00098375	
PX0339	11/4/2008	Email from G. Bartlett to J. Kearney et al. re Election Day Update	Degraffenreid Dep. Ex. 330	SBE00022661	

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PX0340	4/17/2014	Email from B. Webb to V. Degraffenreid et al. re DMV Missing Images for March 31, 2014	Degraffenreid Dep. Ex. 331	DOT00011962 - DOT00011963	
PX0341	10/9/2014	Email from V. Degraffenreid to G. McCue et al. re Procedure for VR Forms in Which No U.S. Citizenship Box is Checked	Degraffenreid Dep. Ex. 337	SBE00063181 - SBE00063192	
PX0342	10/10/2014	Email from A. Giddens to V. Degraffenreid re Voter Registration	Degraffenreid Dep. Ex. 339	SBE00117192	
PX0343	1/21/2010	Email from S. Carbo to G. Bartlett et al. re Thank You!	Degraffenreid Dep. Ex. 346		
PX0344	11/6/2014	Email from V. Degraffenreid to K. Strach et al. re Halifax Absentee Ballot Issues	Degraffenreid Dep. Ex. 351	SBE00066403 - SBE00066406	
PX0345	4/11/2013	Email from V. Degraffenreid to M. Burris re Absentee Ballots	Degraffenreid Dep. Ex. 352		
PX0346	4/17/2013	Email from G. Bartlett to R. Starling et al. re Comments on PCS	Degraffenreid Dep. Ex. 353	SBE-P00157901 - SBE-P00157902	
PX0347	3/5/2013	Email from J. DeLancy to P. Stam re Emancipation Defined by Voter Registration	DeLancy Dep. Ex. 3	VIP000712 - VIP000714	
PX0348	4/12/2013	Email from J. DeLancy to F. DeLuca et al. re Talking Points	DeLancy Dep. Ex. 10	CIVITAS_000317 - CIVITAS_000319	
PX0349	3/3/2013	Email from J. DeLancy to Rep. P. Stam et al. re Emancipation Defined by Voter Registration	DeLancy Dep. Ex. 11	VIP000715 - VIP000717	
PX0350	4/15/2013	Email from J. DeLancy to A. Shreve (Sen. B. Cook) re ElectionOnlineWeekly - March 7, 2013 Colleges & Elections	DeLancy Dep. Ex. 12	VIP000494 - VIP000496	
PX0351	7/24/2013	Email from J. DeLancy to Rep. D. Lewis et al. re HB 589	DeLancy Dep. Ex. 13	VIP000348	
PX0352	3/25/2013	Email from J. DeLancy to merlin1246@aol.com et al. re Student Dependents	DeLancy Dep. Ex. 4	VIP000604 - VIP000607	
PX0353	4/4/2013	Email from J. DeLancy to A. Shreve (Sen. B. Cook) et al. re Press Release, Senators Propose Bill to Ensure Voter Integrity	DeLancy Dep. Ex. 7	VIP000539 - VIP000540	
PX0354	4/1/2013	Email from J. DeLancy to J. Blaine et al. re Equalize Voter Rights (Draft Bill & VIP-NC Leg Advsry)	DeLancy Dep. Ex. 8	VIP000577 - VIP000578	
PX0355		Email from R. Dishong to C. Mulder et al. re DMV Mobile Unit Repairs Postpone Visits to Area Towns	Dishong Dep. Ex. 217	DOT00008419 - DOT00008422	
PX0356	10/3/2014	Email from K. Thomas to B. LiVecchi et al. re New Question for DMV	Fitzgerald Dep. Ex. 269; Thomas Dep. Ex. 241	SBE00599175 - SBE00599176	
PX0357	9/12/2014	Email from G. McCue to G. Michalek et al. re Voter Moves Within County Versus Between Counties	Fitzgerald Dep. Ex. 279; Strach Dep. Ex. 368	SBE00125681 - SBE00125685	
PX0358	11/17/2014	Email from V. Degraffenreid to G. McCue re Voter Registration/Provision Vote Not Counted	McCue Dep. Ex. 460	SBE00117188 - SBE00117189	
PX0359	7/30/2014	Email from B. LiVecchi to J. Howard et al. re One-Stop Early Voting Hours Reduction Requests Summary 7/30/14	McCue Dep. Ex. 464	SBE00128379 - SBE00128380, SBE00129992	
PX0360	7/29/2014	Email from G. McCue to B. LiVecchi re One-Stop Hours Reduction Requests	McCue Dep. Ex. 465	SBE00129991 - SBE00129992	
PX0361	7/29/2014	Email from G. McCue to K. Strach et al. re State Board Meeting Materials Revised	McCue Dep. Ex. 467	SBE00125188 - SBE00125191	
PX0362	10/22/2014	Email from V. Degraffenreid to SBE)Grp - Directors.BOE et al. re Voter Moves and attaching Flow Charts	McCue Dep. Ex. 469	SBE00597500 - SBE00597502	
PX0363	10/25/2013	Email from D. Wright to V. Degraffenreid et al. re Question on Voter ID	McCue Dep. Ex. 471	SBE-P-00091833	
PX0364	1/7/2015	Email from B. Neesby to J. Lawson et al. re No ID List	Neesby Dep. Ex. 440	SBE00756924 - SBE00756925	
PX0365	4/4/2014	Email from D. Wright to C. Poucher re Election Bills	Poucher Dep. Ex. 460	CTRL00035929	
PX0366	11/5/2014	Email from C. Poucher to V. Degraffenreid re Willow Oak Polling Location	Poucher Dep. Ex. 463	SBE00101090 - SBE00101092	
PX0367	8/5/2011	Email from G. Bartlett to J. McLean re NC State Board of Elections Research Inquiry	Poucher Dep. Ex. 464	SBE-P-00097599	
PX0368	5/9/2014	Email from C. Poucher to J. Howard et al. re U.S. Postal Service Disenfranchised a Chief Judge	Poucher Dep. Ex. 465	SBE00033642 - SBE00033650	
PX0369	11/4/2014	Email from G. McCue to G. Sims et al. re Citizenship Audit Results	Sims Dep. Ex. 447	SBE00066095 - SBE00066098	
PX0370	4/4/2014	Email from K. Strach to G. Sims et al. re State Board of Elections Presentation to Legislative Committee	Sims Dep. Ex. 448	SBE00027008 - SBE00027013	
PX0371	10/17/2014	Email from G. Sims to C. Poucher et al. re Wake - DMV	Sims Dep. Ex. 449	SBE00063178 - SBE00063180	
PX0372	10/17/2014	Email from C. Poucher to G. Sims et al. re Wake - DMV	Poucher Dep. Ex. 450; Sims Dep. Ex. 450	SBE00063193 - SBE00063195	

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PX0373	11/5/2014	Email from C. Poucher to R. Anderson et al. re Absentee Envelopes	Sims Dep. Ex. 452	SBE00066367 - SBE00066368	
PX0374	10/23/2014	Email from R. Anderson to G. Sims et al. re USPS - Absentee Mail	Poucher Dep. Ex. 453; Sims Dep. Ex. 453	SBE00063248 - SBE00063249	
PX0375	11/5/2014	Email from D. Wright to C. Poucher et al. re Voter Problems - Paul Kearns District 20-11	Sims Dep. Ex. 456	SBE00993667 - SBE00993669	
PX0376	8/29/2014	Email from G. Cohen to K. Strach et al. re Judicial Voter Guide to Group Housing	Strach Dep. Ex. 362	SBE00027386 - SBE00027387	
PX0377	10/30/2014	Email from R. Voller to K. Strach et al. re Registered Voters Being Dropped from the Rolls in North Carolina	Strach Dep. Ex. 369	SBE00104168 - SBE00104171	
PX0378	11/27/2013	Email from R. Dishong to K. Thomas re Voter ID	Thomas Dep. Ex. 252	DOT00002438 - DOT00002442	
PX0379	2/24/2014	Email from M. Thomas to D. Ulmer attaching Meeting Minutes for 2-20-2014 Meeting with Voter ID Case	Vashchenko Dep. Ex. 231	DOT00011358 - DOT00011361	
PX0380	11/6/2014	Email from J. Lawson to M. Kricker re Wait Times at Polling Places		SBE00998740	
PX0381	10/3/2013	Email from V. Vaschenko to T. Bucholtz et al. re Voter Scrub	Vaschenko Dep. Ex. 230	DOT00005773 - DOT00005774	
PX0382	10/21/2014	Email from E. Gignac to T. Robertson re Voter Registration Mismanagement	Gignac Dep. Ex. 2		
PX0383	10/21/2014	Email from T. Robertson to E. Gignac re Voter Registration Mismanagement	Gignac Dep. Ex. 3		
PX0384	10/21/2014	Email from V. Degraffenreid to C. Boyd-Malette re Voter Registration Mismanagement	Gignac Dep. Ex. 5	DOT00013926	
PX0385	3/6/2013	Email from V. Degraffenreid to Rep. H. Warren attaching DMV & SBOE ID Analysis 2013 Supplement Tables		LEG00000246 - LEG00000251	
PX0386	1/3/2013	Email from S. Graham (Rep. Warren) to G. Sydnor re January 8th Voter ID Conversation		LEG00001111	
PX0387	7/26/2013	Email from B. Eldridge (Sen. P. Berger) to Pastor Laughlin re Questions Answered		LEG00001223	
PX0388	6/14/2013	Email from merlin1246@aol.com to Rep. H. Warren et al. re How Do You Explain This? and attaching SC Photo ID Law		LEG00001273 - LEG00001280	
PX0389	4/7/2013	Email from Rep. H. Warren o D. Rasmussen et al. re Absentee Ballot - Two Witnesses Versus Current One?		LEG00001298 - LEG00001299	
PX0390	7/24/2013	Email from Rep. H. Warren to A. Maestas re Media Request, NBC Latino re NC Voter ID Bill		LEG00003211 - LEG00003213	
PX0391	4/23/2013	Email from J. DeLancy to Rep. T. Murray re If All Else Fails		LEG00003583 - LEG00003584	
PX0392	2/20/2013	Email from Rep. D. Lewis to D. Molinaro et al. re Voter ID		LEG00003630 - LEG00003638	
PX0393	1/25/2013	Email from B. Jones to El Churchill et al. re Voter ID Bill		LEG00004141 - LEG00004142	
PX0394	6/26/2013	Email from C. Gooden to P. Hirschorn re CBS Evening News: NC Voter ID		LEG00004801	
PX0395	4/3/2013	Email from T. Boyum to J. Shaw (Speaker Tillis' Office) re Media Advisory: Tillis to Hold Press Conference Thursday to Discuss Voter ID Legislation		LEG00004853 - LEG00004854	
PX0396	6/17/2013	Email from Sen. T. Goolsby to S. Thompson re Article in Macon News		LEG00004879	
PX0397	5/3/2013	Email from M. Coggins (Rep. D. Lewis) to G. Cappy re Comment on Voter ID Proposals		LEG00004883	
PX0398	1/11/2013	Email from J. Lisella (Rep. T. Tillis) to merlin1246@aol.com re Emergency Room Photo ID Required		LEG00004918 - LEG00004919	
PX0399	2/7/2013	Email from Rep. H. Warren to A. Latos re Hi from WSOC		LEG00005002 - LEG00005003	
PX0400	7/5/2013	Email from T. Tillis to D. Lewis et al. re Meeting with RNC Field Director/Moral Mondays		LEG00005072 - LEG00005075	
PX0401	3/15/2013	Email from Rep. H. Warrant o J. Rhodes re NC Voter ID Law - Indiana State Photo ID Law Upheld by the US Supreme Court		LEG00005103	
PX0402	4/16/2013	Email from G. Gebhardt to J. Bonnet et al. re North Carolina Voter ID Law - Public Hearing Next Week		LEG00005136 - LEG00005140	
PX0403	1/11/2013	Email from J. Lisella (Rep. T. Tillis) to K. Yowell re Photo ID Law		LEG00005192 - LEG00005193	
PX0404	7/25/2013	Email from Rep. H. Warren to B. Ware re Voter ID Bill		LEG00005384	
PX0405	3/8/2013	Email from M. Fliss to Rep. D. Lewis re Voter ID Laws		LEG00005424 - LEG00005442	
PX0406	4/18/2013	Email from J. Shaw to T. Boyum re Voter ID Question		LEG00005460	
PX0407	4/9/2013	Email from D. Williams to Rep. D. Lewis et al. re Voter ID		LEG00005494 - LEG00005501	
PX0408	3/7/2013	Email from Rep. D. Lewis to B. Tyler et al. re Voter ID		LEG00005503	
PX0409	7/2/2013	Email from P. Hirschorn to C. Gooden (Sen. T. Apodaca) re Voter ID		LEG00005572 - LEG00005577	

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PX0410	4/18/2013	Email from Rep. H. Warren to D. Dvoracek re Tribes NOT Recognized		LEG00005639 - LEG00005640	
PX0411	7/23/2013	Email from M. Binker to J. Shaw (Speaker Tillis' Offices) re Tillis / Election Bill Question		LEG00005762	
PX0412	7/25/2013	Email from L. Leslie to J. Shaw (Speaker Tillis' Office) re Time Limits on Voter ID		LEG00005766	
PX0413	3/13/2013	Email from J. DeLancy to Rep. D. Lewis et al. re House Election Committee		LEG00006810 - LEG00006812	
PX0414	4/2/2013	Email from B. Clyne to Rep. R. Brawley et al. re H.B. 451		LEG00006939 - LEG00006940	
PX0415	2/28/2013	Email from Rep. D. Lewis to H. von Spakovsky et al. re Hearing		LEG00007012 - LEG00007014	
PX0416	3/7/2013	Email from G. Rogers (Rep. D. Lewis) to H. von Spakovsky et al. re Hearing		LEG00007024 - LEG00007026	
PX0417	7/26/2013	Email from P. Hirschhorn to J. Shaw (Speaker Tillis' Office) re CBS Evening News: VIVA		LEG00007058	
PX0418	7/24/2013	Email from N. Evans to Rep. H. Warren re VIVA		LEG00007071	
PX0419	7/24/2013	Email from Rep. H. Warren to N. Evans re VIVA		LEG00007072	
PX0420	4/4/2013	Email from T. Pittman (Rep. L. Pittman) to hoover@myglnc.com re Representative Larry G. Pittman's April 3rd Newsletter		LEG00009963 - LEG00009964	
PX0421	4/11/2013	Email from R. Starling (Speaker Tillis' Office) to M. Burris et al. re Additional Analysis		LEG00022577 - LEG00022578	
PX0422	4/12/2013	Email from M. Burris to T. Farr et al. re Additional Analysis		LEG00022579 - LEG00022582	
PX0423	4/10/2013	Email from R. Starling (Speaker Tillis' Office) to V. Degraffenreid et al. re Absentee Ballots		LEG00023208 - LEG00023210	
PX0424	4/3/2013	Email from S. Nichols to G. Bartlett et al. re DMV Audit Items		LEG00023249 - LEG00023251	
PX0425	4/5/2013	Email from M. Burris to R. Starling (Speaker Tillis' Office) et al. re DMV Audit Items		LEG00023254 - LEG00023257	
PX0426	3/28/2013	Email from T. Farr to S. Nichols et al. re DMV Audit Items		LEG00023260 - LEG00023264	
PX0427	3/20/2013	Email from J. McLean to S. Nichols et al. re Interview of Gary Bartlett		LEG00023273 - LEG00023276	
PX0428	3/21/2013	Email from R. Starling (Speaker Tillis' Office) to J. McLean et al. re Interview of Gary Bartlett		LEG00023284 - LEG00023289	
PX0429	3/20/2013	Email from R. Starling (Speaker Tillis' Office) to J. McLean et al. re Interview of Gary Bartlett		LEG00023295 - LEG00023299	
PX0430	4/8/2013	Email from R. Starling (Speaker Tillis' Office) to M. Burris et al. re DMV Audit Items		LEG00023303 - LEG00023306	
PX0431	7/23/2013	Email from T. Bragg to L. Beller re Save the Vote! Say NO to HB-589		LEG00023342 - LEG00023343	
PX0432	4/7/2013	Email from R. Wood to Sen. P. Berger re I Oppose the Election Omnibus Bill		LEG00002051	
PX0433	4/23/2008	Email from V. Degraffenreid to Directors.boe re 2008-2009 attaching Memo from G. Bartlett to Directors, County Boards re One-Stop Rejections		SBE-P-00079431 - SBE-P-00079432	
PX0434	4/4/2013	Email from R. Starling (Speaker Tillis' Office) to M. Burris et al. re DMV Audit Items		SBE-P-0015870 - SBE-P-0015872	
PX0435	3/15/2013	Email from V. Degraffenreid to G. Bartlett et al. re On-Line Registration and Same Day Registration	Churchill Dep. Ex. 523	SBE-P-00148948 - SBE-P-00148949	
PX0436	2/9/2012	Email from E. Churchill to M. Burris et al. re 2008 Statewide and Federal Stats	Churchill Dep. Ex. 524	SBE-P-00149588 - SBE-P-00149590	
PX0437	2/8/2012	Email from M. Burris to D. Sheerin et al. re 2008 Statewide and Federal Stats	Churchill Dep. Ex. 525	SBE-P-00149620 - SBE-P-00149622	
PX0438	10/17/2012	Email from E. Churchill to V. Degraffenreid et al. re 2008 Same Day Registration Stats	Churchill Dep. Ex. 526	SBE-P-00150374 - SBE-P-00150375	
PX0439	10/17/2012	Email from V. Degraffenreid to G. Bartlett et al. re 2008 Same Day Registration Stats	Churchill Dep. Ex. 527	SBE-P-00150685 - SBE-P-00150686	
PX0440	3/27/2013	Email from G. Bartlett to R. Starling (Speaker Tillis' Office) et al. re DMV Audit Items	Churchill Dep. Ex. 521	LEG00023269 - LEG00023272	
PX0441	3/7/2012	Email from B. Garrett-Jones to E. Churchill et al. re Straight Party Voting Demographics	Churchill Dep. Ex. 531	SBE-P-00153764 - SBE-P-00153766	
PX0442	11/12/2013	Email from V. Degraffenreid to K. Strach et al. re Archive		SBE01001483 - SBE01001485	
PX0443	11/12/2013	Email from V. Degraffenreid to C. Collicutt re Archive		SBE01001497 - SBE01001499	
PX0444	11/13/2013	Email from V. Degraffenreid to C. Collicutt re Archive		SBE01001500 - SBE01001503	
PX0445	11/13/2013	Email from C. Collicutt to V. Degraffenreid re Archive		SBE01001504 - SBE01001508	
PX0446	1/14/2014	Email from V. Degraffenreid to A. Penny attaching Notice re Incomplete Voter Registration Application Template, Request for Identification Information Template, Absentee Ballot Request Template, and Petition Change Letter Template		SBE-P-00151240 - SBE-P-00151248	
PX0447	4/10/2013	Email from G. Bartlett to R. Starling (Speaker Tillis' Office) et al. re Absentee Ballots		LEG00022566 - LEG00022570	
PX0448	10/25/2014	Email from M. Perry to V. Degraffenreid re Curb Side Voting Made Difficult		SBE00054037 - SBE00054038	

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PX0449	8/15/2013	Email from K. Campbell to K. Strach et al. re Watauga County Board of Elections, One-Stop Implementation Plan for 2013 Municipal Elections and attaching One-Stop Implementation Plan for November 5, 2013 Municipal Election		SBE-P-00048320 - SBE-P-00048330	
PX0450	7/18/2014	Email from C. Kreuger to M. Perry et al. re Voter Registration Question		BERT-00000860	
PX0451	11/5/2014	Email from J. Gibbs to M. Perry et al. re Wait Times at Precinct 30-1		BERT-00001014	
PX0452	11/1/2014	Email from M. McFadyen to K. Strach re Guidance		SBE00126051 - SBE00126053	
PX0453	2/15/2013	Email from B. Lung to Rep. D. Conrad et al. re NCDL for Illegals		LEG00003868 - LEG00003870	
PX0454	2/22/2013	Email from H. Mitchell to T. Apodaca et al. re Civitas Institute Latest News Letter		LEG00003576 - LEG00003578	
PX0455	3/6/2013	Email from B. Gray to Rep. D. Lewis re Let's Talk Voter ID - The Locker Room		LEG00003532 - LEG00003533	
PX0456	10/4/2013	Email from M. Tutor to V. Degraffenreid et al. re Voter Fraud Chart	Tutor Dep. Ex. 320	SBE-P-00023023	
PX0457	8/2/2013	Email from D. Wright to E. Churchill re SBE Meeting	Churchill Dep. Ex. 530	SBE-P-00024429 - SBE-P-00024433	
PX0458	3/22/2011	Email from V. Degraffenreid to E. Churchill et al. re HB 351 - Outstanding Questions from 3/15 House Election Laws	Churchill Dep. Ex. 529	SBE-P-00150705	
PX0459	1/25/2012	Email from M. Burris to E. Churchill et al. re 2008 Statewide and Federal Stats	Churchill Dep. Ex. 528	SBE-P-00150554 - SBE-P-00150555	
PX0460	1/9/2013	Email from E. Churchill to G. Bartlett et al. re DMV - Unlicensed Voters	Churchill Dep. Ex. 522	SBE-P-00148391 - SBE-P-00148394	
PX0461	7/24/2013	Email from J. DeLancy to Rep. D. Lewis re Thank you!		LEG00001780	
PX0462	4/12/2013	Email from J. DeLancy to J. Wilson et al. re § 163 166.11 Provisional Voting Requirements		LEG00003652 - LEG00003655	
PX0463	4/1/2013	Email from J. DeLancy to J. Kelly et al. re Equalizing Voter Rights (Draft Bill & VIP-NC Leg Advrsy)		LEG00003795 - LEG00003796	
PX0464	6/29/2013	Email from C. Hughes to Rep. H. Warren re [New Post] This Week in Raleigh with Rep. Harry Warren		LEG00001736 - LEG00001741	
PX0465	4/1/2013	Email from J. Biello to J. Blain et al. re Thank You for Taking the Lead on the Equalize Voter Rights Legislation		LEG00003832 - LEG00003835	
PX0466	4/9/2013	Email from Rep. D. Lewis to T. Oudeh re Protect Voting in NC		LEG00003252 - LEG00003253	
PX0467	4/8/2013	Email from B. Pruet to District General Distribution re Voter ID, Tax Reform Update, and Repeal of Racial Justice Act		LEG00001877 - LEG00001880	
PX0468	3/29/2013	Email from P. Nelson to Rep. T. Tillis et al. re HB451		LEG00002031 - LEG00002032	
PX0469	6/28/2013	Email from G. McCue to SBOE-Grp - Directors.BOE re Survey: CBE Director Input on Prospect of Reduced One-Stop Voting Period		UNI-00000394	
PX0470	10/12/2014	Email from V. Degraffenreid to B. LiVecchi et al. re Citizenship Review Voters Processed		SBE00130638 - SBE00130640	
PX0471	9/29/2010	Email from M. Tutor to C. Rhinehart et al. re Voter Fraud Actions Needed Now	Rhinehart Dep. Ex. 1	CTRL00278954	
PX0472	9/29/2010	Email from D. Wright to C. Rhinehart et al. re Voter Fraud Actions Needed Now	Rhinehart Dep. Ex. 2	CTRL00250077	
PX0473	11/2/2004	Email from M. Tutor to C. Rhinehart re Possible Absentee Fraud	Rhinehart Dep. Ex. 3	CTRL00250361	
PX0474	10/27/2010	Email from D. Wright to M. Tutor re NC Voter Fraud Revised Addition	Rhinehart Dep. Ex. 4	CTRL00207432	
PX0475	10/23/2014	Email from C. Boyd-Malette to T. McLawhorn re Citizen	Boyd-Malette Dep. Ex. 495	DOT00013980 - DOT00013982	
PX0476	1/2/2015	Email from P. Polito to J. Higgins et al. re 2015 Mobile Unit Schedule	Boyd-Malette Dep. Ex. 497	DOT00014523 - DOT00014524	
PX0477	1/1/2014	Email from T. Bucholtz to T. Bucholtz et al. re VIVA Information and attached Events and Messages Related to Voter	Bucholtz Dep. Ex. 501	DOT00008587 - DOT00008590	
PX0478	9/11/2014	Email from T. Bucholtz to NCDOT - DMVOutages re Forest City Office	Bucholtz Dep. Ex. 502	DOT00013186 - DOT00013187	
PX0479	9/18/2014	Email from T. Bucholtz to NCDOT - DMVOutages re Cary	Bucholtz Dep. Ex. 503	DOT00013188 - DOT00013189	
PX0480	12/15/2014	Email from N. Barnes to C. Boyd-Malette re MFP	Bucholtz Dep. Ex. 504	DOT00014057 - DOT00014059	
PX0481	11/6/2014	Email from M. Burris to M. Burris re DMV MOU and attached Memorandum of Understanding	Burris Dep. Ex. 305	SBE00027087 - SBE00027101	
PX0482	8/12/2013	Email from M. Burris to V. Degraffenreid et al. re MOU NCSBE NCDOT DMV V1 with attached Memorandum of Understanding	Burris Dep. Ex. 306	SBE-P-00122098 - SBE-P-00122121	
PX0483	1/27/2014	Email from M. Burris to K. Strach re "Test" DBA Report	Burris Dep. Ex. 307	SBE-P-00117293	
PX0484	1/13/2015	Email from T. Bucholtz to V. Degraffenreid et al. re Follow Up	Burris Dep. Ex. 308	SBE00601450 - SBE00601451	
PX0485	9/5/2014	Email from K. Cosner to T. Fitzgerald et al. re Voter ID Material for County BOE	Cosner Dep. Ex. 287	SBE00033199 - SBE00033200	

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PX0486	11/17/2014	Email from E. Burton to L. Price re Complaint/Issue Referrals	Degraffenreid Dep. Ex. 323	SBE00028614 - SBE00028615	
PX0487	5/28/2014	Email from G. McCue to K. Strach et al. re Lara Files on One-Stop Voting and attaching One-Stop Absentee Site Analysis Memoranda and Voter Turnout Spreadsheet	Degraffenreid Dep. Ex. 332	SBE00056802 - SBE00056805	
PX0488	6/20/2014	Email from B. LiVecchi to G. Pridgen et al. re No ID	LiVecchi Dep. Ex. 473	SBE00123256 - SBE000123257	
PX0489	1/15/2015	Email from D. Wright to K. Strach et al. re Information from the JEOLC	McCue Dep. Ex. 461	SBE00993589 - SBE0099590	
PX0490	11/7/2014	Email from B. Neesby to K. Strach re Preliminary Verification Mailing Analysis	Neesby Dep. Ex. 445	SBE00066409 - SBE00066410	
PX0491	11/25/2014	Email from G. Michalek to C. Roper et al. re Democracy NC Claims Up to 50,000 Voters "Silenced" by New Voting Restrictions	Neesby Dep. Ex. 446	SBE00128998	
PX0492	10/27/2014	Email from G. Sims to K. Strach et al. re EV Turnout for Sunday 10/26	Sims Dep. Ex. 454	SBE00063678 - SBE00063680	
PX0493	10/22/2014	Email from G. Sims to D. Wright re GS 163-45 "Amended At-Large Observer List"	Sims Dep. Ex. 455	SBE00099493 - SBE00099496	
PX0494	3/27/2013	Email from D. Wright to V. Degraffenreid et al. re VR Guidelines SEIMS HAVA	Strach Dep. Ex. 39	SBE00016172	
PX0495	9/27/2013	Email from K. Strach to L. Lovedahl re Voter ID and Voter Name	Strach Dep. Ex. 364	SBE-P-00092571	
PX0496	5/30/2007	Email from M. Tutor to G. Bartlett et al. re Double Voting, Deceased Voter Check	Tutor Dep. Ex. 316	SBE00026164 - SBE00026165	
PX0497	2/9/2009	Email from G. Bartlett to M. Tutor et al. re '08 General Election Double Voters	Tutor Dep. Ex. 319		
PX0498	5/12/2014	Email from K. Holland to M. Tutor et al. re Duplicate Voters	Tutor Dep. Ex. 321	SBE00045192 - SBE00045196	
PX0499	6/16/2014	Email from M. Tutor to D. Wright attaching MT Administrative Investigations	Tutor Dep. Ex. 322	SBE00075286	
PX0500	7/25/2014	Email from C. Boyd-Malette to P. Manley re expiration date on no-fee voter ID	P. Manley Dep. Ex. 515	DOT00013118-19	
PX0501	8/13/2013	Email from D. Wright to K. Strach re another complaint about Watauga County's early voting plan		SBE-P-00117340 - SBE-P-00117341	
PX0502	8/13/2013	Email from D. Wright to M. Robinson responding to complaint about Watauga County's early voting plan		SBE-P-00117342 - SBE-P-00117343	
PX0503	8/28/2013	Email exchange between V. Degraffenreid and L. Lovedahl re whether HB 589 changes students' dependent status if they register at college		SBE-P-00008195	
PX0504	8/28/2013	Email from V. Degraffenreid explaining that high school student could not preregister students in high school voter-registration drive because preregistration ends 9/1/2013		SBE-P-00117681	
PX0505	3/11/2013	Email from D. Yelton to Rep. D. Lewis forwarding another email D. Yelton sent re voter ID		LEG00003524 - LEG00003525	
PX0506	10/25/2013	Email string re transfer of out-of-state license after obtaining a North Carolina ID card		SBE-P-00140625 - SBE-P-00140627	
PX0507	6/2/2009	Email from G. Bartlett to Rep. T. Cotham attaching letter re HB 1260			
PX0508	5/4/2014	E-mail string between Kathy Ray, Veronica Degraffenreid and others. April & May 2014, Subject: Question-Madison County Provisional Voter Info	DeGraffenreid Dep. Ex. 342	SBE00084649	
PX0509		Graph, Access to a Working Vehicle, Family Life Project (North Carolina)	Vernon-Feagans Dep. Ex. 3		
PX0510		Graph, Access to Technology, Family Life Project (North Carolina)	Vernon-Feagans Dep. Ex. 4		
PX0511		Graph, Literacy Level, Family Life Project (North Carolina)	Vernon-Feagans Dep. Ex. 5		
PX0512		Graph, Residential Instability Indicators, Family Life Project (North Carolina)	Vernon-Feagans Dep. Ex. 6		
PX0513		Graph, Hardship Experiences Since 2008, Family Life Project (North Carolina)	Vernon-Feagans Dep. Ex. 7		
PX0514	8/12/2012	Natasha Khan & Corbin Carson, <i>Comprehensive Database of U.S. Voter Fraud Uncovers No Evidence That Photo ID Is Needed</i> , News21			
PX0515	12/2006	U.S. Election Assistance Commission Report, <i>Election Crimes: An Initial Review and Recommendations for Future Study</i>			
PX0516	4/17/2013	<i>Elon Poll: NC Citizens Oppose Several State Legislative Proposals, View Results Spanning Various Issues</i> , High Country Press			
PX0517	3/4/2013	<i>Survey Finds Wide Support for Voter ID Law</i> , Elon University Poll			
PX0518	7/9/2014	<i>How the North Carolina Voter Identification Verification Act Was Passed Is Proof That These Voter ID Laws Are Truly Voter Suppression Laws</i> , Lean Left			
PX0519	6/11/2011	Bryan Warner, <i>N.C. House Passes Photo ID Requirement to Vote</i> , Jones Street Chronicles			
PX0520	4/25/2013	Bryan Warner, <i>N.C. House Passes Voter ID Bill</i> , Jones Street Chronicles			

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PX0521	6/25/2011	Gary D. Robertson, <i>NC Gov Vetoes Voter ID Bill Pushed by Republicans</i> , Real Clear Politics			
PX0522	6/25/2013	<i>NC Voter ID Bill Moving Ahead with Supreme Court Ruling</i> , WRAL			
PX0523	4/16/2013	<i>New Research Shows Impact of Photo ID on Black Voters</i> , Democracy North Carolina			
PX0524	8/12/2013	<i>North Carolinians Oppose Voting Bill Signed Today</i> , Public Policy Polling			
PX0525	3/5/2013	<i>Republicans to Press Ahead with Voter ID Law</i> , ABC 7 News			
PX0526	4/11/2013	Results of SurveyUSA Mkt Research Study #20443			
PX0527	6/26/2013	<i>Swift Impact of Voting Decision</i> , The Herald Sun			
PX0528	3/16/2013	Laura Leslie, <i>Tillis: Fraud 'Not the Primary Reason' for Voter ID Push</i> , WRAL			
PX0529	6/8/2014	Leigh Ann Caldwell, <i>Vigilante or Vindicator? One Man's Bid to Root Out Voter Fraud</i> , CNN			
PX0530	4/24/2013	Jacob Rosenberg, <i>Voter ID Bill Moves to NC Senate</i> , Daily Tar Heel			
PX0531	4/24/2013	<i>Voter ID Passes House</i> , Roanoke-Chowan News-Herald			
PX0532	8/12/2012	Corbin Carson, <i>Exhaustive Database of Voter Fraud Cases Turns Up Scant Evidence That It Happens</i> , News21 ("What public-records obstacles were encountered?"), available at http://votingrights.news21.com/article/electionfraud-explainer/index.html			
PX0533	3/16/2013	Speaker Tillis Comments on H.B. 589, available at http://www.wral.com/news/state/nccapitol/video/12231808/			
PX0534	4/2013	North Carolina State Board of Elections, 2013 SBOE-DMV ID Analysis			
PX0535	1/2013	North Carolina State Board of Elections, 2013 SBOE-DMV ID Analysis			
PX0536	7/26/2013	<i>A Message from Speaker Thom Tillis</i> , nchouse116.com			
PX0537	8/28/2013	Press Release, <i>N.C. Governor: Protect Election Integrity</i> , Office of the Governor			
PX0538	3/11/2013	North Carolina State Board of Elections, <i>Documented Cases of Voter Fraud</i>			
PX0539	2/28/2014	Andrew Barksdale, <i>Early Voting Hours Reduced</i> , Fayetteville Observer			
PX0540		Allan Lichtman Reliance Materials			
PX0541	2013-2014	Bill History - H.B. 451 (2013-2014 Session)	Justice Dep. Ex. 179		
PX0542	3/12/2013	House Elections Committee Transcript of Proceedings		SBE00000698 - SBE00000866	
PX0543	3/13/2013	House Elections Committee Transcript of Proceedings		SBE00000897 - SBE00000988	
PX0544	4/10/2013	House Elections Committee Transcript of Public Hearing on Voter Identification		SBE00001070 - SBE00001231	
PX0545	4/10/2013	House Elections Committee Transcript of Proceedings		SBE00001018 - SBE00001069	
PX0546	4/17/2013	House Elections Committee Transcript of Proceedings		SBE00001261 - SBE00001404	
PX0547	4/23/2013	House Appropriations Committee Transcript of Proceedings		SBE00000613 - SBE00000671	
PX0548	4/24/2013	House Floor Session Transcript of the Proceedings		SBE00001688 - SBE00001868	
PX0549	7/24/2013	Senate Floor Session Transcript of Proceedings		SBE00002186 - SBE00002328	
PX0550	7/25/2013	Senate Floor Session Transcript of Proceedings		SBE00002084 - SBE00002185	
PX0551	2/24/2005	Transcript of House Committee on Election Law and Campaign Finance Report			
PX0552	4/18/2013	House Finance Committee Transcript of Proceedings		SBE00001637 - SBE00001675	
PX0553	4/2/2014	Joint Legislative Elections Oversight Committee Transcript of Proceedings	Roberts Dep. Ex. 1		
PX0554	3/4/2015	K. Strach and A. Strange, NC State Board of Elections before the Joint Committee on Appropriations General Government	Degraffenreid Dep. Ex. 326		
PX0555	2013-2014	Bill History - S.B. 666 (2013-2014 Session)	Justice Dep. Ex. 180		
PX0556	1999-2000	Bill History - S.B. 568 (1999-2000 Session)	Justice Dep. Ex. 182		
PX0557		Administration of Voter Registration, Policies and Procedures for the Implementation of the National Voter Registration Act of 1993 and Article 7A, Chapter 163 of the North Carolina General Statutes	Strach Dep. Ex. 40	SBE00016173 - SBE00016222	
PX0558	9/2014	United States Government Accountability Office Report to Congressional Requester, <i>Elections: Issues Related to State Voter Identification Laws</i> , GAO-14-634	Hood Dep. Ex. 385		

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PX0559	6/15/2015	Ex. F to Affidavit of Kelly Thomas, <i>Currie v. North Carolina</i> (NC DMV Draft Schedule of Required Documents)			
PX0560	5/28/2009	Memo from V. Degraffenreid to B. Lucas re North Carolina's Response to Early Voting Survey for Hubert Humphrey Policy Fellows Program at the University of Minnesota	Strach Dep. Ex. 15		
PX0561	8/19/2013	Transcript of K. Cosner's Annual Report to Allegheny Board of Elections	Cosner Dep. Ex. 284		
PX0562	12/11/2013	Letter from M. Murphy to K. Strach re Allegheny County Board of Elections and attaching Resolution and One Stop Implementation Plan	Cosner Dep. Ex. 285	SBE-P-00009473 - SBE-P-00009476	
PX0563	10/30/2014	Memo from K. Cosner to K. Strach re Robeson Status Report	Cosner Dep. Ex. 289	SBE00030437 - SBE00030438	
PX0564	3/2013	SBOE Presentation to House Elections Committee	Degraffenreid Dep. Ex. 324	SBE-P-00096042	
PX0565	3/2013	NC State Board of Elections List Maintenance Summary: Voter Fraud Prevention and Managing the Voter Lists in North Carolina	Degraffenreid Dep. Ex. 325	SBE-P-00054634 - SBE-P-00054645	
PX0566	3/28/2003	Memo from B. Rauf to Director, County Board of Elections re eDMV (Update), SEIMS Numbered Memo: 2003-0002	Degraffenreid Dep. Ex. 338	SBE00604399 - SBE00604404	
PX0567	1/12/2009	Memo from M. Burris to Director, County Board of Elections re DL# Validation, SSN Validation and Unique ID Processing, SEIMS Numbered Memo: 2009-0003	Degraffenreid Dep. Ex. 340	SBE00604572 - SBE00604585	
PX0568		NC SBOE Report: Clarification on Same Day Registration Process and the Handling of Legacy Voters	Degraffenreid Dep. Ex. 347	SBE00020523 - SBE00020526	
PX0569	7/29/2014	State Board of Elections Official Meeting Minutes	McCue Dep. Ex. 463	SBE00760495 - SBE00760500	
PX0570	8/21/2014	State Board of Elections Official Meeting Minutes	McCue Dep. Ex. 466	SBE00761713 - SBE00761718	
PX0571	9/3/2014	Letter from K. Strach to Z. Keaton re Opportunity to Register to Vote	McCue Dep. Ex. 470	SBE01002545	
PX0572	5/11/2009	Minutes from Wake County Board of Commissioners Work Session	Poucher Dep. Ex. 466		
PX0573	8/6/2014	Memo from B. Webb to Driver Services Field and Support Staff re Verification of Voter Information Act (VIVA)	Webb Dep. Ex. 221	DOT DEP000005 - DOT DEP000022	
PX0574		State Board of Elections' Staff Review of HB587		LEG00022571 - 00022572	
PX0575	3/2013	NC State Board of Elections List Maintenance Summary: Voter Fraud Prevention and Managing the Voter Lists in North Carolina	Tutor Dep. Ex. 311	SBE-P-00054705 - SBE-P-00054716	
PX0576		Voter Fraud Referrals to DAs	Tutor Dep. Ex. 312	SBE00015576 - SBE00015610	
PX0577	4/12/2013	NC SBOE Documented Cases of Voter Fraud in North Carolina	Tutor Dep. Ex. 313		
PX0578	6/13/2007	Letter from G. Barrett to Auditor L. Merritt re Response to Findings and Recommendations Flowing from Strategic Review of Registered Voter Database and Voter History Database	Tutor Dep. Ex. 317	CTRL00218213	
PX0579	3/19/2015	Index of NVRA/NVRA Reports	Degraffenreid Dep. Ex. 327		
PX0580	12/20/2013	Hearing Transcript, <i>In re 2013 Pembroke Town Council Election</i>	Strach Dep. Ex. 367		
PX0581	4/13/2015	Wake County Polling Place Changes	Sims Dep. Ex. 457		
PX0582	4/19/2011	Memo from J. McLean to Sen. M. Nesbitt re Preliminary One-Stop Data Analysis and attaching L. Owensby Memo		SBE01002477 - SBE01002479	
PX0583	4/19/2011	One-Stop, In-Person Absentee Voter Turnout Spreadsheet		SBE01002425	
PX0584	4/19/2011	County One Stop Site Voter Counts Spreadsheet		SBE01002426	
PX0585	4/8/1996	Memo from G. Bartlett et al. to County Board of Elections re Provision Ballots, SBOE Memorandum No. 96-13		SBE00002573 - SBE00002579	
PX0586	2004	OneStop Sites and Times for the General Election November 2, 2004	Strach Dep. Ex. 4	SBE-P-00052589 - SBE-P-00052593	
PX0587	2008	One-Stop Voting Sites for the November 4, 2008 General Election	Strach Dep. Ex. 5	SBE-P-00047625 - SBE-P-00047645	
PX0588	2010	One-Stop Voting Sites for the May 4, 2010 Primary Election	Strach Dep. Ex. 6	SBE-P-00052972 - SBE-P-00053000	
PX0589	2010	One-Stop Voting Sites for the November 2, 2010 General Election	Strach Dep. Ex. 7	SBE00024116 - SBE00024162	
PX0590	2012	One-Stop Voting Site List, 2012 Primary (May 8, 2012)	Strach Dep. Ex. 8	SBE-P-00047546 - SBE-P-00047578	
PX0591	2012	One-Stop Voting Sites for the November 6, 2012 General Election	Strach Dep. Ex. 9	SBE-P-00047434 - SBE-P-00047533	
PX0592	2014	NC One-Stop Voting Sites for the May 6, 2014 Election	Strach Dep. Ex. 10		
PX0593	2006	2006 General Election One Stop Locations		SBE-P-00083239	
PX0594	2014	NC One-Stop Voting Sites for the November 4, 2014 Election			

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PX0595		Letter Template re Incomplete Voter Registration Application		SBE00134169 - SBE00134171	
PX0596	1/28/2008	Memo from J. McLean to Directors re Revised Procedure for Denial Letters and Certified Mail-Voter Scan, State Board of Elections Memo No. 2008-02		SBE-P-00153635 - SBE-P-00153637	
PX0597	10/2013	North Carolina Voter Registration Application (in color)			
PX0598		2014 Provisional Ballot Envelope (Durham County)			
PX0599		2014 Provisional Voter Instructions (Durham County)			
PX0600		2014 Provisional Voting Application (Durham County)			
PX0601	9/2011	Provisional Voting Administrative Procedures		SBE00025861 - SBE00025893	
PX0602	4/4/2008	Memo from G. Bartlett and V. Degraffenreid to Directors, County Boards of Elections re Post-May Verification of College/University Students' Campus Residency, State Board of Elections Memo No. 2008-06		SBE-P-00154963 - SBE-P-00154964	
PX0603	3/30/2011	Memo from G. Bartlett to Rep. D. Lewis re State Board of Elections' Comments on House Bill 351		SBE-P-00149693 - SBE-P-00149696	
PX0604	10/24/2014	Press Release, <i>Board of Elections Finalizes Citizenship Audit</i> , NC State Board of Elections			
PX0605	11/1/2014	Email from K. Strach to SBOE_Grp - Directors.BOE re Citizenship Audit Results		BERT-00000096	
PX0606		NC State Board of Elections, <i>Multipartisan Assistance Teams (MATS)</i>	Banks Dep. Ex. 1		
PX0607	9/3/2013	Forsyth County Board of Elections Board Meeting Minutes	Roberts Dep. Ex. 3		
PX0608	10/15/2013	Forsyth County Board of Elections Board Meeting Minutes	Roberts Dep. Ex. 4		
PX0609	5/18/2015	NCDOT: Non-Operator ID Cards, Voter ID, and No-Fee ID Cards	Boyd-Malette Dep. Ex. 494		
PX0610	1/1/2014	System Change Request Form	Bucholtz Dep. Ex. 499	DOT00000014 - DOT00000020	
PX0611	5/21/2014	North Carolina Department of Transportation, CR3125 - Phase 2, Change of Scope II through VI, Technology Solution Requirements Document, Version 5	Bucholtz Dep. Ex. 500	DOT00012262 - DOT00012340	
PX0612	5/2013	NC State Board of Elections Voter Registration Policies and Procedures Processes Manual: Provision Voting Procedures	Degraffenreid Dep. Ex. 335	SBE00083256 - SBE00083263	
PX0613	4/3/2014	Memo from K. Strach to County Boards of Elections re Handling Unreported Moves and Out of Precinct Voters, NC State Board of Elections Memo No. 2014-05	Strach Dep. Ex. 37		
PX0614		One Stop Application	Degraffenreid Dep. Ex. 355	SBE-P-00092447	
PX0615	6/10/2014	Memo from K. Strach to County Boards of Elections re One-Stop Voting for the 2014 General Election, NC State Board of Election Memo No. 2014-08	Plaintiff's Dep. Ex. 468	SBE00604218 - SBE00604219	
PX0616	10/17/2013	Memo from K. Strach to County Boards of Elections re One-Stop Early Voting in the 2014 Primary and Session Law 2013-381's Hours-Matching Requirement, NC State Board of Elections Memo No. 2013-05	Strach Dep. Ex. 22	SBE00003655 - SBE00003659	
PX0617	1/7/2014	Memo from K. Strach to County Boards of Elections re One-Stop Implementation Plans: May 2014 Primary, NC State Board of Elections Memo No. 2014-01	Strach Dep. Ex. 25	SBE-P-00005298 - SBE-P-00005299	
PX0618	1/10/2014	Memo from K. Strach to County Boards of Elections re May 2014 Primary One-Stop Hours Reduction Requests, NC State Board of Elections Memo No. 2014-02	Strach Dep. Ex. 26	SBE-P-00005300 - SBE-P-0005302	
PX0619		Letters from CBOEs to K. Strach re Requests for Reduction in Hours	Strach Dep. Ex. 28		
PX0620		Orders, <i>In re One-Stop Absentee Voting Required Hours Reduction May 6, 2014 Primary</i> , State Board of Elections	Strach Dep. Ex. 29		
PX0621	3/2014	NC State Board of Elections, Provisional Voting Post HB 589	Strach Dep. Ex. 36		
PX0622	8/28/2012	Memo from G. Bartlett to Directors re Proof of Residency for Same Day Registrants, NC State Board of Elections Memo No. 2012-20	Strach Dep. Ex. 38	SBE-P-00075169 - SBE-P-00075171	
PX0623	5/16/2014	Letter from A. Peters to M. Elias re DMV Registration	Strach Dep. Ex. 176		
PX0624	2/6/2015	Letter from K. Strach to Hon. C. Mills re Results of a Citizenship Audit Conducted by the State Board of Elections Prior to the 2014 General Election	Strach Dep. Ex. 372		
PX0625	10/4/2006	Letter from C. Vickory III to G. Bartlett re John Doe Voter Registration Forms in Wayne County, GS 163-275 (13)	Tutor Dep. Ex. 314	SBE00011158	

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EXHIBIT C: PLAINTIFFS' JOINT EXHIBIT LIST

<u>Trial Exhibit No.</u>	<u>Doc Date</u>	<u>Description</u>	<u>Joint Appendix Range/Deposition Exhibit Reference</u>	<u>Bates Range</u>	<u>Admission Status</u>
PX0626	9/14/2010	Letter from M. Tutor to Hon. B. David re Double Voting	Tutor Dep. Ex. 315	SBE00010940	
PX0627	11/18/2014	Double Voters	Tutor Dep. Ex. 318	SBE00066802 - SBE00066804	
PX0628		Written Comments of Cherie Poucher Before the Elections Assistance Commission re Implementation and Use of Provisional Voting	Poucher Dep. Ex. 207		
PX0629	6/1/2015	Isela Gutierrez & Bob Hall, <i>Alarm Bells from Silence Voters</i> , Democracy NC Report			
PX0630		U.S. Department of Justice, The National Voter Registration Act of 1993 (NVRA), Questions and Answers, <i>available at</i> http://www.justice.gov/crt/about/vot/nvra/nvra_faq.php			
PX0631	1/26/2015	Memo from B. Hall and I. Gutierrez to State Board of Elections re Feedback on the 2014 Election and Impact of H-589 on Voter Turnout	Strach Dep. Ex. 370		
PX0632		Georgia Secretary of State, Brian P. Kemp: Voting with Photo Identification		LEG00024223 - LEG00024245	
PX0633	6/15/2015	Thirds Stipulation re Information in the SEIMS Database			
PX0634		NC State Board of Elections Registration Applications Submitted from NVRA Public Assistance Agencies, by Year (compilation of NVRA data from SBOE FTP site)			
PX0635	6/30/2013	U.S. Election Assistance Commission, The Impact of the National Voter Registration Act of 1993 on the Administration of Elections for Federal Office 2011-2012			
PX0636	2/23/2015	<i>League of Women Voters Target VIP Over Past Student-Voting Proposal</i> , Voter Integrity Project North Carolina	DeLancy Dep. Ex. 5		
PX0637	4/3/2013	Media Advisory, <i>Equalize the Vote!</i> , Voter Integrity Project of NC	DeLancy Dep. Ex. 9	CIVITAS_000557	
PX0638	4/12/2013	<i>Statement on Possible Errors</i> , Voter Integrity Project North Carolina	DeLancy Dep. Ex. 18		
PX0639	6/19/2015	<i>Intel Response: The Voter ID Compromise</i> , Voter Integrity Project North Carolina			
PX0640	10/22/2010	Letter from B. Jealous to Hon. T. Kaane		NCSC00005565	
PX0641		Returned Mail from Metro Productions to Emmanuel P. Salak	Roberts Dep. Ex. 5		
PX0642		Rise & Fall of Registration Applications Submitted from NVRA Public Asst. Agencies, by Year	Degraffenreid Dep. Ex. 328		
PX0643		NC Voter Registration Data for 2007-2014	Degraffenreid Dep. Ex. 329		
PX0644	3/24/2014	Letter from R.J. Cox to J. Howard re Orange County Early Voting Plan		SBE00099931 - 00099942	
PX0645	3/2014	Letter from K. Knight to J. Howard re Orange County Early Voting Plan		SBE00099968 - SBE00099970	
PX0646	6/27/2015	Durham County Voter Information - Precinct Level			
PX0647		Voter Registration Applications		NCSC00008793 - NCSC00008948	
PX0648	7/1/2013	Survey re Potential Impacts of Reduced One-Stop Voting Period		UNI-00000395	
PX0649		Anthony Wilson, <i>Voters Wait in Long Lines on Last Day of Early Voting</i> , ABC 11	Poucher Dep. Ex. 462		
PX0650	1/10/2013	Associated Press, <i>McCrory Not Wedded to Photo ID Requirement to Vote</i> , Jacksonville Daily News			
PX0651	11/21/2008	Jack Hawke, <i>McCrory's Election Performance Defended</i> , Carolina Journal Online			
PX0652	10/10/2011	Jane Mayer, <i>State for Sale</i> , The New Yorker			
PX0653	1/14/2013	Paul Woolverton, <i>GOP-led General Assembly Plans to Pass Law Requiring Voters to Show ID</i> , Fayetteville Observer			
PX0654	8/13/2013	Mark Binker, <i>Precincts Versus Early Voting Locations</i> , WRAL			
PX0655	8/21/2012	Jennifer Suarez, <i>Wake Elections Board Dismisses Most Voter Challenges</i> , Raleigh Public Record			
PX0656	10/29/2012	Laura Leslie and Mark Binker, <i>Election Chief: Scams, Misbehavior Mark 2012</i> , WRAL			
PX0657	6/24/2015	Associated Press, <i>Some Counties Reduce Hours for Early Voting</i> , Greensboro			
PX0658	6/18/2015	Anne Blythe and Colin Campbell, <i>NC Legislature Votes to Soften Voter ID Requirement</i> , The News & Observer			
PX0659	10/31/2014	Gavin Off, <i>NAACP Asks for Investigation in Burning of Huntersville Political Sign</i> , Charlotte Observer			

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<u>Trial Exhibit No.</u>	<u>Doc Date</u>	<u>Description</u>	<u>Joint Appendix Range/Deposition Exhibit Reference</u>	<u>Bates Range</u>	<u>Admission Status</u>
PX0660	4/5/2013	Ari Berman, <i>7 Ways North Carolina Republicans are Trying to Make it Harder to Vote</i> , The Nation			
PX0661	8/21/2005	Jim Morrill, <i>Heated Debate on Hot Topic Opportunity, Risk Coexist as Politicians Seek Solutions that Work and Win</i> , The Charlotte Observer			
PX0662	2/24/2015	Defendants' Third Amended Initial Disclosures	Poucher Dep. Ex. 458		
PX0663	3/23/2015	Defendants' Objections and Responses to Plaintiff United States' First Set of Request for Admission			
PX0664	4/24/2015	Defendants' Supplemental and Amended Objections and Responses to Requests for Admission			
PX0665	2/3/2014	Defendants' Objections and Responses to the United States' First Set of Request for Production to Defendants			
PX0666	2/25/2014	Defendants' Objections and Responses to the Plaintiffs' League of Women Voters' First Interrogatories to Defendants			
PX0667	1/16/2015	Defendants' Objections and Responses to the NAACP Plaintiffs' Second Set of Interrogatories to Defendants No. 12,13,16, and 17			
PX0668	3/23/2015	Defendants' Objections and Responses to the United States' Fourth Set of Interrogatories			
PX0669	1/22/2015	Defendants' Objections and Responses to the United States' Third Set of Interrogatories No. 10,11, and 13			
PX0670	12/17/2014	Defendants' Objections and Responses to the United States' Second Set of Interrogatories to Defendants			
PX0671	6/26/2015	United States' Request for Judicial Notice with Exhibits A-H			
PX0672	12/2/2013	Defendant's Answer			
PX0673	1/16/2015	Defendants' Objections and Responses to the United States' Third Set of Interrogatories No. 12 and No. 14			
PX0674	3/13/2015	Enlarged Portion of Appendix A to Declaration of Kim Westbrook Strach	Strach Dep. Ex. 360		
PX0675	1/22/2014	Defendants' Objections and Responses to the League of Women Voters' 1st Request for Production			
PX0676	7/2/2014	Declaration of Carolyn Coleman			
PX0677	7/2/2014	Declaration of Rev. J. Mendez			

General Information

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