

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

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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. )

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**Case No.: 1:13-CV-658**

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

Plaintiffs, )

v. )

THE STATE OF NORTH CAROLINA, et al., )

Defendants. )

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**Case No.: 1:13-CV-660**

UNITED STATES OF AMERICA, )

Plaintiffs, )

v. )

THE STATE OF NORTH CAROLINA, et al, )

Defendants. )

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**Case No.: 1:13-CV-861**

**JOINT STATEMENT REGARDING MOTIONS IN LIMINE TO EXCLUDE THE  
TESTIMONY AND STRIKE THE DECLARATIONS OF SEAN P. TRENDE,  
THOMAS B. HOFELLER, AND JANET R. THORNTON**

Pursuant to the Court's July 24, 2015 Order requiring the Parties to supplement their June 23rd motions in limine, the Plaintiffs in *North Carolina State Conference of the NAACP, et al. v. McCrory, et al.*, *League of Women Voters of N.C., et al. v. North Carolina*, and the Duke Intervenor Plaintiffs (collectively, "Plaintiffs") respectfully inform the Court that they intend to *rely in full* on the motions in limine and supporting briefs filed with respect to proposed defense experts Sean P. Trende (ECF Nos. 271, 272 (Case No. 1:13-CV-00660-TDS-JEP)), Thomas B. Hofeller (ECF Nos. 273, 274), and Janet R. Thornton (ECF Nos. 275, 276).<sup>1</sup>

Plaintiffs' motions in limine seek to exclude Sean Trende's and Dr. Hofeller's testimony and findings in this case in their entirety. As a consequence, the arguments contained therein are not specific to, nor are they affected by, the removal of the voter identification claims from the July 2015 trial. With respect to Dr. Thornton, Plaintiffs' motion in limine does not object to her opinions regarding voter identification and, thus, is similarly unaffected by the recent trial changes. Accordingly, for all of the reasons set forth in their July 23rd motions and supporting briefs, Plaintiffs respectfully request that the Court exclude Sean Trende's and Dr. Hofeller's testimony in its entirety and strike their declarations in this case. Further, they respectfully request that the Court exclude certain testimony of Dr. Thornton and strike portions of her declarations as identified in Plaintiffs' motion.

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<sup>1</sup> The undersigned are authorized to represent that Plaintiff, the United States of America, joins this motion.

Dated: June 26, 2015

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on June 26, 2015, I served Supplement to Plaintiffs' Motions in Limine to Exclude the Testimony and Strike the Declarations of Sean P Trende, Thomas B. Hofeller, and Janet R. Thornton using the CM/ECF system, by filing a copy thereof in case numbers 1:13-cv-658 and 1:13-cv-660, which will send a Notice of Electronic Filing to all parties with an e-mail address of record, who have appeared and consent to electronic service in all above-captioned actions.

*/s/ Edwin M. Speas, Jr.*  
Edwin M. Speas, Jr.

## General Information

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