

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.

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

**CONSENT MOTION AND STIPULATION REGARDING THE COMPLETION OF
FACT WITNESS DEPOSITIONS**

The League of Women Voters Plaintiff Group and Defendants respectfully move the Court to modify the scheduling order entered on April 28, 2015 (Doc. 261 in Case No. 1:13-cv-00660) to allow the parties the opportunity to take depositions through June 12, 2015 of fact witnesses disclosed by either party on or before May 22, 2015. In the event one or more such depositions cannot be completed by June 12, 2015, the parties further request that the Court allow the parties to stipulate to take depositions of witnesses beyond June 12, 2015, if necessary. Under this Court's scheduling order, all remaining fact witness depositions should be completed by today, June 5, 2015. The League of Women Voters and Defendants have worked diligently to complete nearly 40 fact witness depositions over the past two months. There are seven fact witnesses disclosed by the League of Women Voters Plaintiff Group that have not been deposed.

In addition, the United States and Defendants respectfully move this court to modify the scheduling order entered on April 28, 2015 (Doc. 250, 1:13-cv-861), to allow the depositions of James Lell and Erica Churchill to occur by June 12, 2015. The United States and Defendants have worked diligently to complete all other depositions in the 1:13-cv-861 case by the deadline of June 5, as outlined in the Court's scheduling order.

The requested additional time to complete these depositions will not affect any of the other additional pre-trial deadlines set forth in the Court's April 28, 2015 scheduling order.

Dated: June 5, 2015.

Respectfully Submitted,

By: /s/ Allison J. Riggs

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CERTIFICATE OF SERVICE

I hereby certify that on June 5, 2015, I filed the foregoing using ECF in the Middle District of North Carolina, which will send the foregoing via email to the following:

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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]
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