

Multiple Documents

Part	Description
1	11 pages
2	Exhibit A
3	Text of Proposed Order

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.

**NAACP PLAINTIFFS' MOTION
IN LIMINE TO EXCLUDE
DEFENDANTS' UNTIMELY
DISCOVERY MATERIALS**

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

I. INTRODUCTION

The NAACP plaintiffs, the United States, the League of Women Voters plaintiffs, and the Duke intervenor-plaintiffs (collectively, “Plaintiffs”) respectfully file this Motion in Limine to exclude untimely evidence produced by Defendants after the close of discovery in this litigation.¹ Nearly three months after the deadline for the production of documents (and without an agreement otherwise that these materials could be produced late), and with just weeks remaining before trial, Defendants have produced a stream of newly created reports, affidavits, and declarations to rebut expert reports and other issues raised months ago. These untimely materials are apparently being generated in response to issues raised during the preliminary injunction hearing, fact witness depositions, and Plaintiffs’ expert reports. After more than a year and a half of discovery, the time for creating and producing such material ended months ago. Defendants should not be permitted to circumvent the Court’s scheduling orders by producing such material after the close of discovery. Given the myriad of pre-trial deadlines in place, these late disclosures so close to the start of trial will be highly prejudicial to Plaintiffs without time to further depose witnesses. Plaintiffs therefore seek an order excluding Defendants’ recent untimely document productions.²

II. BACKGROUND

Pursuant to the Court’s applicable scheduling order, written discovery in this

¹ Plaintiffs bring this motion now in accordance with the Court’s pretrial schedule for consideration of motions. *See* ECF No. 285.

² Counsel for the NAACP plaintiffs conferred with counsel for Defendants regarding this motion, and counsel for Defendants indicated their opposition to it.

litigation closed on March 24, 2015, *see* ECF No. 244, and was later extended to April 17, 2015 for the limited purpose of resolving issues that were already in dispute as of March 24, *see* ECF No. 255. In the last three weeks, however—months after the close of written discovery—Defendants have produced four new sets of documents. Specifically:

- On Saturday, June 6, 2015, Defendants produced a report by Kim W. Strach on mail verification rates for same-day-registration voters and non-same-day-registration voters during the 2012 election cycle. Defendants also produced the data used to create the report.
- On Friday, June 12, 2015, Defendants produced a report by Kim W. Strach analyzing data on provisional ballots cast during the 2014 general election. Defendants also produced the data used to create the report.
- On Monday, June 15, 2015, Defendants produced an affidavit of Kelly J. Thomas, prepared for use in the *Currie* case, regarding the issuance of no-fee voter identification cards by the North Carolina Department of Motor Vehicles. The affidavit was accompanied by approximately 120 pages of NCDMV records, forms, and internal e-mails, some of which were not previously produced in this litigation.³
- In addition, on Monday, June 15, 2015, Defendants also produced an affidavit of Janet Thornton, prepared for use in the *Currie* case. Although the affidavit is ostensibly a rebuttal to Plaintiffs' expert's report in *Currie*, Dr. Thornton critiques the analysis of Dr. Charles Stewart, the United States' expert in this federal case, throughout her affidavit.⁴

All of these materials were produced well after the close of written discovery, as well as after the close of expert discovery, and thus, they do not comply with the Court's scheduling orders. *See* ECF No. 244 ("Rebuttal Expert Reports will be due on March 16,

³ These materials that were not previously produced have still not been produced in compliance with the parties' ESI agreement, as approved by the Court.

⁴ In light of North Carolina's passage of new voting legislation and the consequent deferral of voter ID claims in this case, Plaintiffs expect that Defendants will not seek to raise the Thomas and Thornton affidavits at trial. However, in an abundance of caution, Plaintiffs are including those affidavits in this motion in order to preserve the issues.

2015. ... Sur-Rebuttal Expert Reports will be due on March 24, 2015. All discovery except for depositions shall be concluded by March 24, 2015. ... All depositions of experts ... shall be completed by April 10, 2015.”); *see also* ECF No. 255 (extending deadline for written discovery to April 17, 2015 for the limited purpose of resolving issues that were already in dispute as of March 24). Moreover, these materials were produced long after the depositions of the relevant SBOE and NCDMV staff were completed, and long after Plaintiffs’ experts had time to consider the materials in their reports.

III. ARGUMENT

The time for production of discovery documents has ended, and the parties are less than two weeks away from trial. The parties had nearly 18 months to exchange documents and did, in fact, exchange a large volume of documents. Pursuant to this Court’s order, the deadline for written discovery was March 24, 2015, *see* ECF No. 244, yet nearly three months after that date, Defendants show no sign of stopping their steady stream of supplemental productions. Defendants should be precluded from using this untimely material at trial.

The Federal Rules provide that “[a] party that without substantial justification fails to disclose information required by Rule 26(a) or 26(e)(1), or to amend a prior response to discovery as required by Rule 26(e)(2), is not, unless such failure is harmless, permitted to use as evidence at trial ... any witness or information not so disclosed.” *S. States Rack & Fixture, Inc. v. Sherwin-Williams Co.*, 318 F.3d 592, 596 (4th Cir. 2003) (quoting Fed. R. Civ. P. 37(c)(1)). The “basic purpose” of this rule is to “prevent[]

surprise and prejudice to the opposing party.” *Id.*; accord *Firehouse Rest. Grp., Inc. v. Scurmont LLC*, No. 4:09-cv-00618-RBH, 2011 WL 3555704, at *2 (D.S.C. Aug. 11, 2011) (same); see also *Bowling v. Hasbro, Inc.*, No. 05-229S, 2007 WL 3274328, at *2 (D.R.I. Nov. 5, 2007) (“[S]upplemental discovery material that is provided much too close to trial may be excluded.”). The Federal Rules also provide that a pretrial scheduling order “may be modified only for good cause and with the judge’s consent.” Fed. R. Civ. P. 16(b)(4).

Here, the Court ordered that all written discovery should be complete by March 24, 2015, see ECF No. 244, and the Court has not modified that deadline for written discovery except for the limited purpose of resolving discovery issues already in dispute as of March 24, see ECF No. 255. Yet, nearly three months after the March 24 deadline, Defendants produced documents that they believe support their litigation position and that respond to issues raised during the preliminary injunction hearing, fact witness depositions, and Plaintiffs’ expert reports.

For instance, at her third deposition on **March 24, 2015**, the very day that written discovery closed, Kim Strach stated that no further analysis would be forthcoming from the State Board of Elections regarding mail verification data for new registrants in the 2012 election cycle. Tr. of 3/24/15 K. Strach Dep.⁵ at 202:9-12 (“Q. Okay. And do you expect that she will produce a final report? A. I have not asked her to specifically provide a report.”). Defendants did not produce any interim analysis that was ongoing at that time, although it was requested at that time. Yet, on June 6, 2015, Defendants

⁵ Relevant portions of the March 24, 2015 deposition of Kim Strach are attached hereto as Exhibit A.

produced to Plaintiffs a report on Ms. Strach's letterhead, dated May 19, 2015, conducting the very analysis that Ms. Strach testified she had *not* requested from her staff regarding the 2012 elections. This analysis was created—and produced to Plaintiffs—months after the fact discovery deadline, apparently in response to questions posed by Plaintiffs' counsel at Ms. Strach's deposition.

Defendants' counsel acknowledged that the analysis was prepared for this litigation, and not prepared in the ordinary course, by asserting work-product protection over it during Ms. Strach's March deposition *See* Tr. of 3/24/15 K. Strach Dep. at 203:12-18. Defendants' counsel explained that that "if we intend to offer testimony on it, we'll produce it at that time," *id* at 203:17-18, but that statement did not give Defendants *carte blanche* to disregard the Court's deadline for written discovery and produce additional documents on the eve of trial. Defendants chose not to produce any such report during discovery, did not produce any such report when requested during the deposition, and went so far as to claim work product privilege over any such work. It is not proper for Defendants to keep attempting to generate reports to address litigation issues behind the shield of work product and then throw them over the transom after the close of discovery and on the eve of trial.

Courts routinely prohibit parties from introducing material at trial when that material was not timely disclosed to opposing parties during the discovery period. *See, e.g., Firehouse Rest. Grp.*, No. WDQ-07-1294, 2011 WL 3555704, at *3 (excluding late productions as "untimely and prejudicial" when they were produced four months after close of discovery); *Reaves v. Ragin*, 2011 WL 2579755, at *5 (D. Md. June 23, 2011)

(excluding late productions because “Rule 37 does not allow counsel to ‘simply fail[] to comply with [a discovery] schedule”) (modifications in original) (footnote omitted); *see also Bowling*, 2007 WL 3274328, at *2 (“Opening the doors of discovery to new theories and new evidence at this late stage of the proceedings would unfairly prejudice and harm [opposing party] [S]upplemental discovery material that is provided much too close to trial may be excluded. At this point in the proceedings, discovery has long been closed, the summary judgment stage has passed, and trial is just around the corner.”) (internal citations and quotations omitted). This Court should do the same and preclude Defendants from making use of the late-produced material identified in this Motion, as well as any other productions that may be forthcoming from Defendants.

IV. CONCLUSION

For the foregoing reasons, Plaintiffs respectfully move this Court for an order excluding Defendants’ recent untimely document productions, as listed above, as well as any future untimely productions that Defendants may seek to proffer.

Dated: June 30, 2015

Respectfully submitted,

By: /s/ Daniel T. Donovan

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CERTIFICATE OF SERVICE

I hereby certify that on June 30, 2015, I electronically filed the foregoing **NAACP Plaintiffs' Motion in Limine**, 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.

/s/ Daniel T. Donovan

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Exhibit A

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

NORTH CAROLINA STATE CONFERENCE)
OF THE NAACP,)
et al.,)

Plaintiffs,)

vs.)

Case No: 1:13-CV-658

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

Defendants.)

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

Plaintiffs,)

vs.)

Case No: 1:13-CV-660

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

Defendants.)

UNITED STATES OF AMERICA,)

Plaintiff,)

vs.)

Case No: 1:13-CV-861

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

Defendants.)

VIDEOTAPED DEPOSITION
OF
KIM WESTBROOK STRACH - VOLUME III

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VIDEOTAPED DEPOSITION

OF

KIM WESTBROOK STRACH - VOLUME III

9:10 A.M.

TUESDAY, MARCH 24, 2015

OGLETREE DEAKINS NASH SMOAK & STEWART
4208 SIX FORKS ROAD
SUITE 1100
RALEIGH, NORTH CAROLINA

By: Denise Myers Byrd, CSR 8340, RPR, CLR 102409-02

1 This document was marked at your last
2 deposition at Exhibit 41.

3 Do you recognize this document?

4 A. I have seen this document, yes.

5 Q. And you remember talking about this at your
6 previous deposition?

7 A. I do.

8 Q. You said during this deposition that the State
9 Board of Elections was working on further
10 analysis of the data in this report.

11 Do you remember that?

12 A. I do.

13 Q. Has that analysis been completed?

14 A. Veronica Degraffenreid was the person that I
15 had talked about looking at this and she was
16 just -- she was looking into doing some further
17 analysis, and she has done -- she has done some
18 further analysis on this report as -- in
19 respect to new voters in 2012, yes.

20 Q. And what did her analysis find?

21 A. What her analysis found, I believe -- and I
22 have not seen an official report, but based on
23 discussions with her, this looks at mail
24 verification of new voters. So these are
25 people that are just -- have registered to

1 vote, has nothing to do with their status.

2 So she looked at this and included in
3 her analysis whether or not these individuals
4 have voted as well and how those people might
5 have -- whether or not they have failed mail
6 verification in 2012. That's something that
7 she was looking at as well as part of her
8 analysis of this.

9 Q. I'm sorry. Whether who failed mail
10 verification?

11 A. People that voted in 2012. This report does
12 not look at that.

13 Q. This report looks at all registrants?

14 A. Yes.

15 Q. And so she focused -- she focused on new -- I
16 should have said this was all new registrants?

17 A. Right.

18 Q. And she focused on new registrants that voted
19 in 2012?

20 A. Correct.

21 Q. But she hasn't provided you with written
22 findings?

23 A. She has started -- she hasn't provided me an
24 official report. We've discussed some of her
25 findings she shared with me.

1 Q. So she's shared like charts that show the data
2 that she collected?

3 A. She has shared a chart with me, yes.

4 Q. And do you know when that was?

5 A. It hasn't been all that long ago. I can't
6 specifically tell you, but it has been some --
7 it was after -- it's been after -- it's been --
8 I'm sorry. It's been last month or so.

9 Q. Okay. And do you expect that she will produce
10 a final report?

11 A. I have not asked her to specifically provide a
12 report. I wanted -- when -- I had talked to
13 her -- I did not understand the -- what
14 information was used in this report so that was
15 one of the things that we discussed in my last
16 deposition that I wanted to look at it because
17 I couldn't verify this information because I
18 didn't understand what it was based on.

19 In discussions with her, she informed
20 me that this report didn't have anything to do
21 with whether someone had voted in 2012, and so
22 she thought that would be something that we
23 should also include, and I agree, that is
24 something we should look at that when we're
25 looking at mail verification analysis of new

1 voters.

2 And so that is something she included
3 in her analysis and has provided me a couple of
4 charts with just for my information, but I have
5 not asked her to formally put it in a report.

6 Q. So other than looking at that -- at people who
7 voted in 2012, did you ask her to do anything
8 else with this data?

9 A. I wanted her to look at it and just make sure
10 that it was -- she was comfortable with the
11 data that was in there, so, yes, both.

12 MR. COOPER: Okay. Counsel, I'm not
13 sure if this chart has been produced, but if it
14 hasn't, I would request that it be produced.

15 MR. FARR: We would assert at this
16 point in time a work product privilege as to
17 that chart, but if -- if we intend to offer
18 testimony on it, we'll produce it at that time.

19 BY MR. COOPER:

20 Q. Let's switch gears.

21 A. Sure.

22 Q. I'm going to ask you some questions about voter
23 fraud.

24 Would you agree that the crime of voter
25 fraud hasn't occurred where the voter lacks

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FOR THE MIDDLE DISTRICT OF NORTH CAROLINA

NORTH CAROLINA STATE CONFERENCE
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capacity as the Governor of North Carolina, *et al.*,

Defendants.

**[PROPOSED] ORDER
GRANTING NAACP
PLAINTIFFS' MOTION
IN LIMINE TO EXCLUDE
DEFENDANTS' UNTIMELY
DISCOVERY MATERIALS**

Civil Action No. 1:13-CV-658

LEAGUE OF WOMEN VOTERS OF NORTH
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THE STATE OF NORTH CAROLINA, *et al.*,

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UNITED STATES OF AMERICA,

Plaintiff,

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

Defendants.

Civil Action No. 1:13-cv-861

**[PROPOSED] ORDER EXCLUDING
DEFENDANTS' UNTIMELY DISCOVERY MATERIALS**

This matter is before the Court on the NAACP Plaintiffs' Motion in Limine to exclude certain materials that were produced by Defendants after the close of written discovery and are likely to be offered at trial by Defendants. The Court finds good cause to grant the motion. It is hereby **ORDERED** that:

1. The NAACP Plaintiffs' Motion to Exclude Defendants' Untimely Discovery Materials is **GRANTED**.
2. The following materials are hereby excluded from evidence:
 - (A) the May 19, 2015 North Carolina State Board of Elections report entitled "May 2015: State Board of Elections Analysis of Mail Verification Failure Rates of SDR and Non-SDR voters," and all data produced in connection therewith;
 - (B) the June 12, 2015 affidavit of Kim Westbrook Strach prepared for this litigation, and all exhibits thereto, including the North Carolina State Board of Elections reports entitled "Statewide Provisional Results" and "Statewide Provisional Data by Race," and all data produced in connection therewith;
 - (C) the June 15, 2015 affidavit of Kelly J. Thomas prepared for *Currie v. North Carolina*, 13-CVS-1419 (N.C. Sup. Ct.), and all exhibits thereto;
 - (D) the June 15, 2015 affidavit of Janet R. Thornton prepared for *Currie v. North Carolina*, 13-CVS-1419 (N.C. Sup. Ct.), and all exhibits thereto; and,
 - (E) any materials produced by Defendants on or after June 30, 2015, without leave of this Court.

SO ORDERED.

This ____ day of _____, 2015.

United States District Judge

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