

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 REGARDING
VOTER PHOTO ID CLAIMS**

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 Order of November 4, 2015, the NAACP Plaintiffs and the United States (collectively "Plaintiffs") make the following pretrial disclosures regarding their voter photo ID claims 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 or otherwise address evidentiary issues, in the event that appropriate stipulations cannot be reached. 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.

- (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 Video 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 and Exhibit D. Exhibit C comprises exhibits previously admitted at trial in July 2015, while Exhibit D comprises exhibits that have not been previously admitted.

Dated: January 15, 2016

Respectfully submitted,

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CERTIFICATE OF SERVICE

I hereby certify that on January 15, 2016, I electronically filed the foregoing **PLAINTIFFS' JOINT RULE 26(A)(3) PRETRIAL DISCLOSURES REGARDING VOTER PHOTO ID CLAIMS**, 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.

/s/ Daniel T. Donovan
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