

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  
OBJECTIONS TO  
DEFENDANTS' RULE 26(a)(3)(A)  
PRE-TRIAL 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 OBJECTIONS TO  
DEFENDANTS' RULE 23(a)(3)(A) PRE-TRIAL DISCLOSURES**

Pursuant to the Order of November 4, 2015 and Federal Rules of Civil Procedure 26(a)(3) and 32(a)(6), the NAACP Plaintiffs and the United States (collectively "Plaintiffs") make the following objections to Defendants' Rule 23(a)(3)(A) Pre-Trial Disclosures [Dkt. 405]:

**I. WITNESSES DEFENDANTS EXPECT TO PRESENT OR MAY PRESENT AT TRIAL:**

In their Pre-Trial Disclosures, Defendants identified Dr. Stephan Thernstrom as an expert witness they expect to present live at trial. Plaintiffs object to Defendants' calling Dr. Thernstrom to testify as an expert at trial to the extent set forth in the NAACP Plaintiffs' Memorandum to Strike in Part the Expert Report of Dr. Stephan Thernstrom [Dkt. 408] and the United States' Memorandum in Support of Motion to Exclude Expert Testimony of Stephan Thernstrom [Dkt. 409-1].

**II. DOCUMENTS AND EXHIBITS, INCLUDING SUMMARIES OF EVIDENCE, THAT DEFENDANTS EXPECT TO OFFER OR MAY OFFER AT TRIAL:**

Plaintiffs hereby submit the attached Objections to Defendants' Documents and Exhibits, Including Summaries of Evidence, That Defendants Expect to Offer or May Offer at Trial [Dkt. Nos. 405, 405-1] at **Exhibit 1**.

Dated: January 22, 2016

Respectfully submitted,

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**CERTIFICATE OF SERVICE**

I hereby certify that on January 22, 2016, I electronically filed the foregoing **PLAINTIFFS' JOINT OBJECTIONS TO DEFENDANTS' RULE 26(A)(3)(A) 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.

/s/ Daniel T. Donovan  
Daniel T. Donovan

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