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

SHAUNA WILLIAMS, et al.,

Plaintiffs,

v.

REPRESENTATIVE DESTIN HALL, in his official capacity as Chair of the House Standing Committee on Redistricting, et al.,

Defendants.

Civil Action No. 23 CV 1057

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

Plaintiffs,

v.

PHILIP BERGER, in his official capacity as the President Pro Tempore of the North Carolina Senate, et al.,

Defendants.

Civil Action No. 23 CV 1104

JOINT MOTION TO MODIFY PRETRIAL DEADLINES AND ACCEPT STIPULATIONS

Williams Plaintiffs, *NAACP* Plaintiffs, Legislative Defendants, and State Defendants (collectively, "Parties") respectfully move the Court to (1) modify the pretrial deadlines set forth in its May 23, 2024 Notice of Hearing, ECF No. 50 ("Notice"), for the exchange of deposition designations and the submission of proposed findings of fact and conclusions of law and (2) accept certain stipulations between the Parties.

Pursuant to the Notice, the current deadline to exchange deposition designations as part of the parties' Rule 26(a)(3) pretrial disclosures is May 16, 2025, and the current deadline for objections to pretrial disclosures is May 30, 2025. The Parties intend to make all witnesses whose testimony they will rely on available to testify at trial and wish to reserve deposition designations for any witnesses who become unavailable due to unforeseen circumstances. Such unforeseen circumstances may not become apparent until the end of trial. Therefore, the Parties request that deposition designations for witnesses who become unavailable for trial be due by July 11, 2025, and objections and counter-designations for deposition designations are due by July 18, 2025. This modification will not affect the May 16, 2025 deadline for other pretrial disclosures or the May 30, 2025 deadline for objections to pretrial disclosures.

Pursuant to the Notice, the current deadline for proposed findings of fact and conclusions of law is May 27, 2025. The Parties believe that submitting proposed findings of fact and conclusions of law post-trial will result in more fulsome submissions and better aid the Court in resolution of the consolidated cases. Therefore, the Parties request that the Court vacate the May 27, 2025 deadline for pre-trial proposed findings of fact and conclusions of law and instead set a post-trial deadline for proposed findings of fact and conclusions of law. The Parties suggest that the specific deadlines for post-trial findings of

fact and conclusions of law be discussed during the requested pre-trial conference or at the beginning of trial. *See* Joint Mot. to Schedule Pretrial Conf., ECF No. 111. This modification will not affect the May 27, 2025 deadline for trial briefs.

The Parties have also conferred and wish to notify the Court of agreement regarding the following stipulations.

- The Parties stipulate to the authenticity of information on the North Carolina State Board of Elections, the United States Census Bureau, and the North Carolina General Assembly websites.
- The Parties stipulate that if an expert witness testifies live at trial, that expert's full reports will be admitted as exhibits, subject to any Daubert challenges.

All Parties have conferred and join in this motion. The Parties respectfully request that the Court grant the modifications pertaining to deadlines for deposition designations and proposed findings of fact and conclusions of law and accept the Parties' stipulations described herein. A proposed order is submitted with this Motion.

Dated: May 9, 2025

Respectfully Submitted,

/s/ Lalitha D. Madduri

/s/ Phillip J. Strach

ELIAS LAW GROUP LLP

Abha Khanna*
1700 Seventh Avenue, Suite 2100
Seattle, Washington 98101
Phone: (206) 656-0177
Facsimile: (206) 656-0180
AKhanna@elias.law

Lalitha D. Madduri*

NELSON MULLINS RILEY & SCARBOROUGH LLP

Phillip J. Strach
North Carolina State Bar no. 29456
Alyssa M. Riggins
North Carolina State Bar no. 52366
Cassie A. Holt
North Carolina State Bar no. 56505
Alexandra M. Bradley

Christina Ford*
Qizhou Ge*
Mark Haidar*
250 Massachusetts Avenue, Suite 400
Washington, D.C. 20001
Phone: (202) 968-4490
Facsimile: (202) 968-4498
LMadduri@elias.law
CFord@elias.law
AGe@elias.law
MHaidar@elias.law

/s/ *Narendra K. Ghosh*

PATTERSON HARKAVY LLP

Narendra K. Ghosh, NC Bar No. 37649
100 Europa Drive, Suite 420
Chapel Hill, NC 27517
Phone: (919) 942-5200
nghosh@pathlaw.com

Counsel for Williams Plaintiffs

* *Special Appearance pursuant to Local Rule 83.1(d)*

/s/ Hilary Harris Klein

SOUTHERN COALITION FOR SOCIAL JUSTICE

Hilary Harris Klein (State Bar #53711)
Jeffrey Loperfido (State Bar #52939)
Christopher Shenton (State Bar #60442)
Mitchell D. Brown (State Bar #56122)
Lily Talerman (State Bar #61131)
5517 Durham Chapel Hill Blvd.
Durham, NC 27707
Telephone: 919-794-4213
Facsimile: 919-908-1525
hilaryhklein@scsj.org
jeffloperfido@scsj.org
chrisshenton@scsj.org

North Carolina State Bar no. 54872
301 Hillsborough Street, Suite 1400
Raleigh, North Carolina 27603
Ph: (919) 329-3800
phil.strach@nelsonmullins.com
alyssa.riggins@nelsonmullins.com
cassie.holt@nelsonmullins.com
alex.bradley@nelsonmullins.com

BAKER & HOSTETLER LLP

Richard B. Raile*
DC Bar No. 1015689
Katherine L. McKnight*
Trevor Stanley*
1050 Connecticut Ave. NW
Suite 1100
Washington DC 20036
Ph: (202) 861-1500
rraile@bakerlaw.com
kmcknight@bakerlaw.com
tstanley@bakerlaw.com

Patrick T. Lewis*
Ohio State Bar No. 0078314
Key Tower
127 Public Square, Suite 2000
Cleveland, Ohio 44114
Ph: (216) 621-0200
plewis@bakerlaw.com

Erika D. Prouty*
Ohio State Bar No. 0095821
200 Civic Center Drive, Suite 1200
Columbus, Ohio 43215
Ph: (614) 462-4710
eprouty@bakerlaw.com

Counsel for Legislative Defendants

**Appeared via Special Notice*

NORTH CAROLINA DEPARTMENT OF JUSTICE

mitchellbrown@scsj.org
lily@scsj.org

HOGAN LOVELLS US LLP

J. Tom Boer*
Olivia Molodanof*
Madeleine Bech*
4 Embarcadero Center, Suite 3500
San Francisco, CA 94111
Telephone: 415-374-2300
Facsimile: 415-374-2499
tom.boer@hoganlovells.com
olivia.molodanof@hoganlovells.com
madeleine.bech@hoganlovells.com

Jessica L. Ellsworth*
Misty Howell*
Odunayo Durojaye*
555 Thirteenth Street, NW
Washington, DC 20004
Telephone: 202-637-5600
Facsimile: 202-637-5910
jessica.ellsworth@hoganlovells.com
misty.howell@hoganlovells.com
odunayo.durojaye@hoganlovells.com

Harmony Gbe*
1999 Avenue of the Stars, Suite 1400
Los Angeles, CA 90067
Telephone: 310-785-4600
Facsimile: 310-785-4601
harmony.gbe@hoganlovells.com

*Appearing in this matter by Special Appearance pursuant to L-R 83.1(d)

Counsel for NAACP Plaintiffs

/s/ *Mary L. Lucasse*

Terence Steed
Special Deputy Attorney General
N.C. State Bar No. 52809
tsteed@ncdoj.gov

Mary L. Lucasse
Special Deputy Attorney General
N.C. State Bar No. 39153
mlucasse@ncdoj.gov

N.C. Department of Justice
P.O. Box 629
Raleigh, NC 27602-0629
Telephone: (919) 716-6567
Facsimile: (919) 716-6761

Counsel for State Defendants

CERTIFICATE OF SERVICE

I certify that on May 9, 2025, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to all counsel of record.

/s/ Lalitha D. Madduri
Lalitha D. Madduri

IN THE UNITED STATES DISTRICT COURT
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SHAUNA WILLIAMS, et al., *Plaintiffs*, v. REPRESENTATIVE DESTIN HALL, in his official capacity as Chair of the House Standing Committee on Redistricting, et al., *Defendants*.	Civil Action No. 23 CV 1057
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[PROPOSED] ORDER

This matter is before the Court upon the Joint Motion by All Parties to modify pretrial deadlines pertaining to the exchange of deposition designations and the submission of proposed findings of fact and conclusions of law and to accept certain stipulations between the Parties.

After consideration of the Motion, and for good cause shown, the Court hereby GRANTS the Motion. The deadline for deposition designations as part of the parties' Rule 26(a)(3) pretrial disclosures is modified from May 16, 2025 to July 11, 2025. The deadline for any objections to deposition designations is modified from May 30, 2025 to July 18, 2025. The May 27, 2025 deadline for pre-trial proposed findings of fact and conclusions of law is vacated, and the specific deadlines for post-trial proposed findings of fact and conclusions of law will be discussed during the pre-trial conference.

The Court also accepts the Parties' stipulations:

- To the authenticity of information on the North Carolina State Board of Elections, the United States Census Bureau, and the North Carolina General Assembly websites.

- That if an expert witness testifies live at trial, that expert's full reports will be admitted as exhibits, subject to any Daubert challenges.

IT IS SO ORDERED on this, the _____ day of May, 2025.

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