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

WILLIAMS AND _NAACP_ PLAINTIFFS' MOTION TO CLARIFY OR MODIFY ALLOTTED TRIAL TIME

Williams Plaintiffs and *NAACP* Plaintiffs (collectively, "Plaintiffs") respectfully move the Court to clarify—or in the alternative, modify—the allotted trial time described in its May 15, 2025 Order, ECF No. 115.

In support of this motion, Plaintiffs contemporaneously file a supporting memorandum of law. For the reasons in their supporting memorandum, Plaintiffs respectfully request that the Court clarify its May 15, 2025 Order regarding the allotted time for trial and respectfully request the Court modify that Order to permit an additional 26 hours of trial time, representing a total of 26 hours for Plaintiffs, jointly, and 26 hours for Defendants, jointly. Legislative Defendants and State Board Defendants take no position on this motion.

A proposed order is submitted with this Motion.

Dated: May 19, 2025

Respectfully Submitted,

/s/ Lalitha D. Madduri

/s/ Hilary Harris Klein

ELIAS LAW GROUP LLP

Lalitha D. Madduri*
Christina Ford*
Lucas Lallinger*
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
LLallinger@elias.law
AGe@elias.law

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

MHaidar@elias.law

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

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

CERTIFICATE OF SERVICE

I certify that on May 19, 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
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

[PROPOSED] ORDER

This matter is before the Court upon Plaintiffs' Motion to clarify and modify allotted trial time, to which the Legislative Defendants and State Board Defendants take no position.

After consideration of the Motion, and for good cause shown, the Court clarifies that:

- In addition to 26 hours of trial time the week of June 16, 2025, the Court has up to 26 hours of trial time available the week of June 23, 2025. In total, Plaintiffs have up to 26 hours to use among themselves and Defendants have up to 26 hours to use among themselves.

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

_____