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

LEGISLATIVE DEFENDANTS'
MOTION IN LIMINE TO EXCLUDE THE NAACP PLAINTIFFS' UNTIMELY DISCLOSURE OF CHRISTOPHER KETCHIE AND RELATED EXHIBITS

Legislative Defendants, each in their official capacities, by and through undersigned counsel, file this motion in limine to exclude potential testimony from Christopher Ketchie ("Ketchie"), and to exclude his declaration and related exhibits from use at trial. The NAACP Plaintiffs' belated disclosure of Ketchie as a person with knowledge, along with

their untimely service of his declaration and related analyses violates Rules of Civil Procedure, as well as this Court's Scheduling Order. [D.E. 48]. These violations prejudice Legislative Defendants and will disrupt the trial. As such, exclusion is warranted.[1]

In support of this motion, Legislative Defendants contemporaneously file a supporting memorandum of law along with supporting exhibits.

WHEREFORE, Legislative Defendants respectfully request that the Court grant this motion in limine and exclude Christopher Ketchie, his declaration, and all supporting exhibits [D.E. 117-2 at NAACPPX 374-453] or any derivatives thereof from use at trial.

Respectfully submitted this, the 23rd day of May 2025.

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[1] As explained further in Legislative Defendants' memorandum in support of this motion, the NAACP Plaintiffs' exhibit list [D.E. 117-2], claims that a few of Ketchie's maps were used as exhibits in certain depositions. [*Id.* at NAACPPX 386, 389, 392, 401]. To the extent the Court is inclined to grant this motion in part, Legislative Defendants respectfully request that the Court exclude all exhibits other than those the NAACP Plaintiffs actually used in depositions and only to the extent the relevant witness is able to authenticate them upon the NAACP Plaintiffs laying a proper foundation for their use.

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CERTIFICATE OF SERVICE

I, Phillip J. Strach, certify that on this, the 23rd day of May 2025, I filed a true and accurate copy of the foregoing document with the Clerk of Court using the CM/ECF electronic filing system, which will send a copy of the same to all counsel of record in the above-captioned matter.

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