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' RULE 26(1)(a)(3)(B) OBJECTIONS TO *WILLIAMS* AND *NAACP* PLAINTIFFS' PRETRIAL DISCLOSURES

Legislative Defendants, pursuant to Fed. R. Civ. P. 26(a)(3)(B) and this Court's pre-trial orders, D.E. 50 and D.E. 115, respectfully serve and file the following objections to Williams and NAACP Plaintiffs' respective pretrial disclosures. Legislative Defendants reserve the right to amend and supplement these objections as the parties continue to meet and confer to narrow the evidentiary issues for trial.

I. OBJECTIONS TO PLAINTIFFS' WITNESS LISTS

Williams Plaintiffs' Witness List. Legislative Defendants do not object to Williams Plaintiffs' witness list [D.E. 116 pp. 6-8] at this time. Legislative Defendants reserve the right to modify, amend, or supplement these objections as appropriate.

NAACP Plaintiffs' Witness List. Legislative Defendants object to the inclusion of Christopher Ketchie on NAACP Plaintiffs' witness list. NAACP Plaintiffs failed to disclose Mr. Ketchie as a witness (fact or expert) during the discovery period, and therefore he should not be permitted to testify at trial. This objection was fully briefed in Legislative Defendants' Motion in Limine filed on May 23, 2025, in accordance with the Court's scheduling order. [D.E. 122-123]. Legislative Defendants reserve the right to modify, amend, or supplement these objections as appropriate.

II. OBJECTIONS TO EXHIBIT LISTS

Attached as **Exhibits 1** and **2** respectively are Legislative Defendants' Objections to Williams and NAACP Plaintiffs' Exhibit Lists. NAACP Plaintiffs served and filed an Amended Exhibit List on the afternoon of May 29, 2025, that withdrew approximately 184 of the 698 exhibits on their original exhibit list. However, at the time of filing, Legislative Defendants had already prepared and were finalizing objections to the original exhibit list. Because transferring all those objections to a new document on short notice would risk a last-minute copy error, the objections Legislative Defendants listed on Exhibit 2 are marked on NAACP Plaintiffs' original exhibit list. However, Legislative Defendants note in italics the withdrawn exhibits and other clarifications provided by Plaintiffs in response to Legislative Defendants' email inquiries.

Legislative Defendants reserve the right to modify, amend, or supplement these objections as appropriate. In light of the Court's encouragement for "the parties to raise any objections to exhibits with the Court before trial[,]" [D.E. 115 at ¶6], Legislative Defendants provide brief explanations for certain categories of objections[1] for the Court's consideration below:

A. *Standing Objections to Portions of Exhibits Regarding Dismissed Claims and Districts Not at Issue.*

Many of the parties' exhibits—including standing declarations executed by individual plaintiffs, voting records for individual plaintiffs and members of the organizational plaintiffs, and expert reports—reference districts that have either been dismissed or were never challenged in this case. On April 8, 2025, this Court entered an order granting summary judgment in part against Williams and NAACP Plaintiffs ("Consolidated Plaintiffs"). In that order, the Court set forth the specific districts challenged by each group of plaintiffs based on their pleadings and discovery responses. [D.E. 98 at 2-3 (listing specific districts)]. The Court then dismissed NAACP Plaintiffs' malapportionment claims against the 2023 House and Senate plans and outlined the districts that Consolidated Plaintiffs lack standing to challenge in this case: SD 7, 38, 39, and 42; HD 4, 11, 21, 33, 34, 35, 36, 38, 39, 40, 41, 49, 66, 72, 74, 75, and 91; and CD 9. [D.E. 98 at 29-30]. Shortly thereafter, Consolidated Plaintiffs both voluntarily dismissed

[1] Legislative Defendants only provide additional explanation on major categories of anticipated evidentiary questions. This filing does not capture the entirety of Legislative Defendants' objections, or arguments in response to objections, to evidence that may be presented at trial. Legislative Defendants reserve the right to raise additional objections to testimony and documents as they are offered.

certain claims with prejudice, including NAACP Plaintiffs' remaining claims involving the 2023 House plan and Williams Plaintiff's racial-gerrymandering claim involving the 2023 Congressional plan. [D.E. 104 (NAACP Plaintiffs), D.E. 107 (Williams Plaintiffs)]. NAACP Plaintiffs filed a Motion for Reconsideration on the dismissal of their malapportionment claims, [D.E. 101], which Legislative Defendants have opposed, [D.E. 113], and is pending before the Court. Therefore, the remaining districts at issue for trial are: CDs 1, 5, 6, 10, 12, and 14; and SDs 1, 2, 8, 40, and 41. [D.E. 98 at 30; D.E. 104 at ¶1].

The significant narrowing of the issues resulting from the summary-judgment order and Consolidated Plaintiffs' pleading amendments, which dismissed with prejudice several claims, now means that many of the parties' trial exhibits contain references to or analysis of the 2023 state house plan or other districts that are no longer at issue. To avoid the need to bog the trial down with objections to specific portions of the numerous exhibits affected by this issue,[2] Legislative Defendants request a standing objection based on relevance and Rule 403 (confuses the issues) to exhibits to the extent they reference districts not at issue in this case. Legislative Defendants request this standing objection to clarify that these extraneous districts are not at issue in this case and to establish that Legislative Defendants

[2] For example, NAACP Exhibit No. 182, the Fairfax Corrected Expert Report, analyzes house districts on pages 31-52 and 64-68, and NAACP Exhibit No. 189, the Oskooii Expert Report, analyzes house districts on pages 5-6, 10, and 43-77, but all claims against the house plan have been dismissed. [D.E. 98 at 29; D.E. 104]. Similarly, Consolidated Plaintiffs have offered standing declarations and voting records for individual plaintiffs and standing members (*see, e.g.*, NAACP Exhibit Nos. 163-165, 363-366; Williams Exhibit Nos. WX66-69) who reside in congressional and senate districts that were never challenged in this action, including CD3, CD13, SD3, SD4, SD5, SD11, SD13, SD27, SD28, and SD32. [D.E. 98 at 2-3].

do not consent to try claims against districts beyond the eleven districts listed above. *See* Fed. R. Civ. P. 15(b)(2).

B. Objections to Certain Exhibits Regarding Legislative & Congressional Acts (Williams Exhibit No. WX115; NAACP Exhibit Nos. 263-66, 299-325, 327-338, 346-350, and 495-496).

Consolidated Plaintiffs' Exhibit Lists contain several categories of exhibits containing or referring to other legislative acts that are likely to be used as improper character evidence under Rule 404 or otherwise confuse the issues under Rule 403.

The first category is statements made by former Senate and House Redistricting Chairs. NAACP Exhibit Nos. 263-266 and Williams Exhibit No. WX115 consist of prior statements made years ago by former legislators Bob Rucho and David Lewis that were used to support racial gerrymandering claims in *Cooper v. Harris*, 581 U.S. 285, 300 (2017). But these prior acts cannot be used to prove that the 2023 North Carolina General Assembly acted in the same way in drawing the 2023 Plans at issue in this case. Fed. R. Civ. P. 404(b)(1); *see Feighan v. Resource Systems Group Inc.*, No. 20-02759 (BAH), 2023 WL 4623123, *9 (D.D.C. July 19, 2023) (providing that Rule 404(b) prohibits evidence of other acts that "lacks any purpose but proving character"). Indeed, the Fourth Circuit has made clear that "[a] legislature's past acts do not condemn the acts of a later legislature, which [the Court] must presume acts in good faith." *N. Carolina State Conf. of the NAACP v. Raymond*, 981 F.3d 295, 298 (4th Cir. 2020); *see also Abbott v. Perez*, 585 U.S. 579, 603-04 (2018). NAACP Exhibit Nos. 263-66 and Williams Exhibit No. WX115 show an attempt to impute the actions of prior legislators onto the Legislative Defendants in this case, and should be excluded as improper character evidence under Rule 404.

The same is true of the second category of exhibits, consisting of various North Carolina General Assembly non-enacted bill drafts, or bills passed outside of the 2023 General Assembly (NAACP Exhibit Nos. 300-05, 307-08, 310-15, 346, and 495-96). Under Rule 404(a), "[e]vidence of a person's character is not admissible to prove that the person acted in accordance with that character or trait on a particular occasion." The prohibition on character evidence ensures that civil judgments are based on the specific facts of the case rather than assumptions about a party's disposition or prior behavior. *See Sparks v. Gilley Trucking Co.*, 992 F.2d 50, 52 (4th Cir. 1993) ("Attempting to prove conduct by showing a character trait is too general and unreliable a method, and therefore it is excluded."); *see also Feighan*, 2023 WL 4623123, at *9. NAACP Exhibit Nos. 300-305, 307-08, 310-15, and 495-96 are bills currently pending before the North Carolina General Assembly, which have little to no probative value to the issue of whether race predominated in the drawing of the 2023 plans by a different legislature. Similarly, NAACP Exhibit No. 346 is the Voter ID implementing legislation (S.L. 2018-144) that was the very subject of *N. Carolina State Conf. of the NAACP v. Raymond*, 981 F.3d 295 (4th Cir. 2020). None of these exhibits can be used to show that the 2023 General Assembly acted in conformity with a particular character trait. As such, NAACP Exhibit Nos. 300-305, 307-08, 310-15, 346, and 495-96 should be excluded as improper character evidence under Rule 404.

Third, NAACP Plaintiffs also include as exhibits bills that were filed, but never passed in 2023. Rule 403 provides that the Court, in its discretion, "may exclude relevant evidence if its probative value is substantially outweighed by a danger of one or more of

the following: unfair prejudice, confusing the issues, misleading the jury, undue delay, wasting time, or needlessly presenting cumulative evidence." NAACP Exhibit Nos. 328-332, 335-338, and 349 were introduced in 2023, but did not pass. These exhibits have little to no probative value, and the danger of confusing the issues and unfair prejudice is high as Plaintiffs likely intend to use these bills to attempt to prove discriminatory intent by the 2023 General Assembly. The same is true of NAACP Exhibit Nos. 347 and 348, S.B. 747 and S.B. 749 respectively, which are the subject of other litigation. None of these bills were challenged in this litigation, and their admission would confuse the issues before the Court. NAACP Exhibit Nos. 328-332, 335-338, and 347-349 should be excluded under Rule 403.

Lastly, and perhaps most problematic, NAACP Exhibit Nos. 299, 306, 316-317, 320-322, 327, and 333-334 are United States House Resolutions, and Nos. 309 and 350 are statements by North Carolina Congressman Addison McDowell. Legislative intent of the North Carolina General Assembly cannot be derived from United States House Resolutions, even if similar bills were introduced in the North Carolina General Assembly. *See Waytec Electronics Corp. v. Rohm & Haas Electronic Materials, LLC*, 255 Fed. Appx. 754, 758 (4th Cir. Nov. 28, 2007) (unreported). To the extent that Plaintiffs are attempting to conflate the intent of Members of Congress with the intent of the General Assembly, this is substantially more likely to confuse the issues than any limited probative value the federal bills or statements might have. NAACP Exhibit Nos. 299, 306, 309, 316-317, 320-322, 327, 333-334, and 350 should be excluded under Rule 403.

C. *NAACP Plaintiffs' Ketchie Exhibits (NAACP Exhibit Nos. 374-453).*

As described in Legislative Defendants' Motion in Limine and Memorandum in Support [D.E. 122-123], Legislative Defendants would be unduly prejudiced should Plaintiffs be allowed to use Ketchie's exhibits at trial.

D. *NAACP Plaintiffs' Needlessly Cumulative Exhibits (NAACP Exhibit Nos. 53, 92-94, 248-51, 282, 297).*

NAACP Plaintiffs' exhibit list contains unnecessary and duplicative items, especially in light of the parties' stipulation "as 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[.]" [D.E. 115 at ¶3]. The following exhibits have limited probative value that is outweighed by their needlessly cumulative nature and are likely to waste time:

- Screenshots of the General Assembly's redistricting and committee webpages (NAACP Exhibit Nos. 53, 282, 297);
- Multiple versions of the same public hearing speaker request forms for public hearing sites (NAACP Exhibit Nos. 92-94);
- Various versions and proposed amendments to the 2021 criteria when the fully adopted criteria is provided and undisputed (NAACP Exhibit Nos. 248-51).

In the interest of streamlining issues for trial, needlessly cumulative materials should be excluded.

Respectfully submitted, this the 30th day of May, 2025.

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**Appeared via Special Notice*

CERTIFICATE OF SERVICE

I hereby certify that on this day the forgoing document was filed on the Court's electronic case filing system (CM/ECF), and that notice of the filing will be served on all counsel of record by the Court's system.

This the 30th day of May, 2025.

NELSON MULLINS RILEY & SCARBOROUGH LLP

By: /s/ Phillip J. Strach
Phillip J. Strach
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Exhibit 1

Exhibit Number	Exhibit Description	Document Identification	LD Objections[1]
	Expert Reports		
WX1	Expert Report of Dr. Jonathan Rodden (Aug. 1, 2024)		Hearsay*[2]
WX2	Expert Reply Report of Dr. Jonathan Rodden (Oct. 17, 2024)		Hearsay*
WX3	Supplemental Rebuttal Report of Dr. Jonathan Rodden (March 31, 2025)		Hearsay*
WX4	Expert Report of Maxwell Palmer, Ph.D. (Aug. 1, 2024)		Hearsay*
WX5	Reply Report of Maxwell Palmer, Ph.D. (Oct. 17, 2024)		Hearsay*
WX6	Supplemental Expert Report of Maxwell Palmer, Ph.D. (March 17, 2025)		Hearsay*
WX7	Supplemental Rebuttal Report of Maxwell Palmer, Ph.D. (March 31, 2025)		Hearsay*
WX8	Expert Report of Dr. Chris Clark (Corrected) (Aug. 1, 2024)		Hearsay*

[1] As referenced in Legislative Defendants' Objections to Plaintiffs' Pre-Trial Disclosures, in order to streamline objections, Legislative Defendants do not include itemized objections to all exhibits regarding districts that have been dismissed or were never challenged. Instead, Legislative Defendants respectfully request a standing objection based on relevance and Rule 403 (confuses the issues) to Plaintiffs' exhibits to the extent that they reference districts not at issue in the case. The lack of itemized objections and request for a standing objection should not be construed as consent to try claims against districts that have been dismissed or were never asserted.

[2] Hearsay* = Objection will be withdrawn pursuant to the parties' stipulation that the full reports of experts who testify at trial shall be admitted as exhibits subject to any *Daubert*/Rule 702 challenges. D.E. 115 at ¶4.

WX9	CV of Dr. Chris Clark		Hearsay*
WX10	Expert Reply Report of Dr. Chris Clark (Oct. 17, 2024)		Hearsay*
WX11	Supplemental Expert Report of Dr. Chris Clark (March 17, 2025)		Hearsay*
WX12	Supplemental Rebuttal Expert Report of Dr. Chris Clark (March 31, 2025)		Hearsay*
WX13	Expert Report of Dr. James L. Leloudis II (Aug. 1, 2024)		Hearsay*
WX14	Expert Report of Dr. Joseph Bagley, Ph.D (Corrected) (Aug. 1, 2024)		Hearsay*
WX15	Expert Reply Report of Dr. Joseph Bagley, Ph.D (Oct. 17, 2024)		Hearsay*
WX16	Supplemental Expert Report of Dr. Joseph Bagley, Ph.D (March 17, 2025)		Hearsay*
WX17	Expert Report of Dr. LaFleur Stephens-Dougan (Aug. 1, 2024)		Hearsay*
WX18	Errata to August 1, 2024 Expert Report of Dr. LaFleur Stephens-Dougan (Oct. 29, 2024)		Hearsay*
WX19	Expert Reply Report of Dr. LaFleur Stephens-Dougan (Oct. 17, 2024)		Hearsay*
WX20	Supplemental Expert Report of Dr. LaFleur Stephens-Dougan (March 17, 2025)		Hearsay*
Expert Report Figures			
WX21	Expert Report of Dr. Jonathan Rodden (Aug. 1, 2024), Figure 2: Dot Density Map of Black		Hearsay*

	Population and 2022 and 2023 Congressional Plans		
WX22	Expert Report of Dr. Jonathan Rodden (Aug. 1, 2024), Figure 4: Dot Density Map of Race in the Piedmont Triad Region		Hearsay*
WX23	Expert Report of Dr. Jonathan Rodden (Aug. 1, 2024), Figure 5: Piedmont Triad Major City Boundaries and 2023 District Boundaries		Hearsay*
WX24	Expert Report of Dr. Jonathan Rodden (Aug. 1, 2024), Figure 6: Dot Density Map of Race in the Charlotte Area		Hearsay*
WX25	Expert Report of Dr. Jonathan Rodden (Aug. 1, 2024), Figure 7: Charlotte City Boundary and 2023 Congressional District Boundaries		Hearsay*
WX26	Expert Report of Dr. Jonathan Rodden (Aug. 1, 2024), Figure 8: Dot Density Map of Race, 2023 District 1 Boundaries, and 2022 District 1 Boundaries, Northeast North Carolina		Hearsay*
WX27	Expert Report of Dr. Jonathan Rodden (Aug. 1, 2024), Figure 9: Dot Density Map of Race, 2023 District 1 Boundaries, and 2022 District 1 Boundaries, Oxford, NC Area		Hearsay*
WX28	Expert Report of Dr. Jonathan Rodden (Aug. 1, 2024), Figure 12: Racial Dislocation Maps, 2022 Congressional Plans		Hearsay*
WX29	Expert Report of Dr. Jonathan Rodden (Aug. 1, 2024), Figure 12: Racial Dislocation Maps, 2023 Congressional Plans		Hearsay*

WX30	Expert Reply Report of Dr. Jonathan Rodden (Oct. 17, 2024), Figure 1: Reproduction of Dr. Trende's Choropleth Map of the Piedmont Triad		Hearsay*
WX31	Expert Reply Report of Dr. Jonathan Rodden (Oct. 17, 2024), Figure 2: Reproduction of Dr. Trende's Choropleth Map of the Charlotte Area		Hearsay*
WX32	Expert Reply Report of Dr. Jonathan Rodden (Oct. 17, 2024), Figure 3: The Distribution of Black Voting-Age Population in Simulated Plans		Hearsay*
WX33	Expert Reply Report of Dr. Jonathan Rodden (Oct. 17, 2024), Figure 4: The Distribution of Black Voting-Age Population in Simulated Maps Versus 2023 Plan		Hearsay*
WX34	Expert Reply Report of Dr. Jonathan Rodden (Oct. 17, 2024), Figure 7: BVAP and BVAP Rank in Enacted and Simulated North Carolina Congressional Plans for Districts in the Piedmont Triad Area where Simulated Plans Produce Four Republican Seats		Hearsay*
WX35	Expert Reply Report of Dr. Jonathan Rodden (Oct. 17, 2024), Figure 9: BVAP Arrayed by Rank, Pro-Republican Simulated Plans and Draft Maps from September		Hearsay*
WX36	Expert Reply Report of Dr. Jonathan Rodden (Oct. 17, 2024), Figure 10: BVAP Arrayed by Rank, Pro-Republican Simulated Plans and Draft Springhetti Maps		Hearsay*
WX37	Expert Reply Report of Dr. Jonathan Rodden (Oct. 17, 2024), Figure 11: BVAP Arrayed by Rank,		Hearsay*

	Pro-Republican Simulated Plans and Draft Maps from October		
WX38	Expert Reply Report of Dr. Jonathan Rodden (Oct. 17, 2024), CBP_1, Appendix 2		Hearsay*
WX39	Expert Reply Report of Dr. Jonathan Rodden (Oct. 17, 2024), CBP_5, Appendix 2		Hearsay*
WX40	Expert Reply Report of Dr. Jonathan Rodden (Oct. 17, 2024), CBK_2, Appendix 2		Hearsay*
WX41	Expert Reply Report of Dr. Jonathan Rodden (Oct. 17, 2024), CBA_2, Appendix 2		Hearsay*
WX42	Expert Reply Report of Dr. Jonathan Rodden (Oct. 17, 2024), CDS 003 and CDS 005, Appendix 2		Hearsay*
WX43	Expert Reply Report of Dr. Jonathan Rodden (Oct. 17, 2024), CMT_1 and CMT_2, Appendix 2		Hearsay*
WX44	Expert Reply Report of Dr. Jonathan Rodden (Oct. 17, 2024), CCH_4 and CMT_2, Appendix 2		Hearsay*
WX45	Expert Reply Report of Dr. Jonathan Rodden (Oct. 17, 2024), CCJ_1 and CCH_4, Appendix 2		Hearsay*
WX46	Expert Reply Report of Dr. Jonathan Rodden (Oct. 17, 2024), CCL_1 and CCJ_1, Appendix 2		Hearsay*
WX47	Expert Reply Report of Dr. Jonathan Rodden (Oct. 17, 2024), CCL_1 and Enacted, Appendix 2		Hearsay*
WX48	Supplemental Rebuttal Report of Dr. Jonathan Rodden (March 31, 2025), Figure 1: Histogram of Black Voting-Age Population (BVAP) in Alternative Plans and Enacted Plan (Excluding Districts 1, 11, and 12)		Hearsay*

WX49	Supplemental Rebuttal Report of Dr. Jonathan Rodden (March 31, 2025), Figure 2: The Enacted Plan in the Piedmont Triad		Hearsay*
WX50	Supplemental Rebuttal Report of Dr. Jonathan Rodden (March 31, 2025), Figure 3: Alternative Plan "CMT-1" in the Piedmont Triad		Hearsay*
WX51	Supplemental Rebuttal Report of Dr. Jonathan Rodden (March 31, 2025), Figure 4: Alternative Plan "Springhetti 3" in the Piedmont Triad		Hearsay*
WX52	Supplemental Rebuttal Report of Dr. Jonathan Rodden (March 31, 2025), Figure 5: Alternative Plan "Springhetti 3, v2" in the Piedmont Triad		Hearsay*
WX53	Expert Report of Dr. Maxwell Palmer (Aug. 1, 2024), Figure 3: Racially Polarized Voting Estimates by Region		Hearsay*
WX54	Supplemental Expert Report of Maxwell Palmer, Ph.D. (March 17, 2025), Figure 2: Racially Polarized Voting Estimates by Region		Hearsay*
Plaintiff Standing Declarations			
WX55	1/3/25 Declaration of Alan Rene Oliva Chapela		§[3]
WX56	1/3/25 Declaration of Allison Shari Allen		Hearsay#[4]
WX57	1/3/25 Declaration of Flor Herrera-Picasso		§

[3] § = Legislative Defendants have no objection to this declaration provided that the declarant does not testify live at trial. Legislative Defendants reserve the right to object to the admission of this declaration on hearsay and other grounds should Williams Plaintiffs amend their witness list or if the declarant testifies live at trial.

[4] Hearsay# = Objection will be withdrawn pursuant to agreement with counsel so long as declarant does not testify live at trial. Declarant is currently listed on Williams Plaintiffs' "Will Call" list.

WX58	1/3/25 Declaration of German De Castro		§
WX59	1/3/25 Declaration of James Adams		Hearsay^^[5]
WX60	1/3/25 Declaration of Laura McClettie		Hearsay^^
WX61	1/3/25 Declaration of Luciano Gonzalez-Vega		§
WX62	1/3/25 Declaration of Natalee Nanette Nieves		§
WX63	1/3/25 Declaration of Nelda Leon		§
WX64	1/3/25 Declaration of Shauna Williams		Hearsay^^
WX65	1/3/25 Declaration of Virginia Keogh		Hearsay^^
WX66	5/13/25 Declaration of Minerva Freeman		Hearsay^^
WX67	5/13/25 Declaration of Maura Aceto		§
WX68	5/13/25 Declaration of Javier Limon		§
WX69	5/13/25 Declaration of Armenta Eaton		Hearsay^^
WX70	5/13/25 Declaration of Chenita Johnson		Hearsay#
WX71	5/13/25 Declaration of Pamlyn Stubbs		Hearsay#
WX72	5/13/25 Declaration of Earl Jones		Hearsay#
Legislative Redistricting – Hearing Transcripts			
WX73	10/19/23 House Redistricting Committee Transcript	LD0000001—LD00000053	
WX74	10/19/23 Senate Redistricting and Elections Committee Transcript	LD0000683—LD0000783	
WX75	10/23/23 Senate Redistricting and Elections Committee Transcript	LD0000784—LD0000827	

[5] Hearsay^^ = Objection will be withdrawn pursuant to agreement with counsel so long as declarant does not testify live at trial. Declarant is currently listed on *Williams* Plaintiffs' "May-Call" list.

WX76	10/24/23 Senate Chamber (Redistricting) Transcript	LD0001826—LD0001899	
WX77	10/24/23 House Redistricting Committee Transcript	LD0000124—LD0000165	
WX78	10/25/23 House Rules, Calendar, and Operations of the House Transcript	LD0003172—LD0003200	
WX79	10/25/23 Senate Redistricting and Elections Committee Transcript	LD0000373—LD0000396	
WX80	10/25/23 House Session (Redistricting) Transcript	LD0001723—LD0001825	
Legislative Redistricting – Public Comment Hearings and Portal Comments			
WX81	H. Comm. on Redistricting, *Joint Committee Meeting Notice & Bill Sponsor Notification: September 25, 2023*, N.C. House of Reps., https://ncleg.gov/Committees/NoticeDocument/6424/Redistricting-(Joint)-400-PM.	Hise Ex. 12	
WX82	NCGA Email Alert of 9/25/23 Public Comment Session	LD0004748—LD0004749	
WX83	H. Comm. on Redistricting, *Joint Committee Meeting Notice & Bill Sponsor Notification: September 26, 2023*, N.C. House of Reps., https://www.ncleg.gov/Committees/NoticeDocument/6425/Redistricting-(Joint)-400-PM.	Hise Ex. 12	
WX84	NCGA Email Alert of 9/26/23 Public Comment Session	LD0004745—LD0004746	

WX85	H. Comm. on Redistricting, *Joint Committee Meeting Notice & Bill Sponsor Notification: September 27, 2023*, N.C. House of Reps, https://www.ncleg.gov/Committees/NoticeDocument/6426/Redistricting-(Joint)-400-PM.	Hise Ex. 12	
WX86	NCGA Email Alert of 9/27/23 Public Comment Session	LD0004756—LD0004757[6]	
WX87	9/25/23 Public Comment Session Transcript	LD0000397—LD0000435	
WX88	9/26/23 Public Comment Session Transcript	LD0000436—LD0000538	
WX89	9/27/23 Public Comment Session Transcript	LD0000539—LD0000682	
WX90	9/28/23 Public Comment Report	LD0000939—LD0000946	Hearsay
WX91	10/5/23 Public Comment Report	LD0000828—LD0000848	Hearsay
WX92	10/12/23 Public Comment Report	LD0000849—LD0000874	Hearsay
WX93	10/19/23 Public Comment Report	LD0000875—LD0000882	Hearsay
WX94	10/23/23 Public Comment Report	LD0000883—LD0000895	Hearsay
WX95	10/24/23 Public Comment Report	LD0000896—	Hearsay

[6] Corrected bates range confirmed by counsel for Williams Plaintiffs via email on 5/27/25.

		LD0000907	
WX96	10/25/23 Public Comment Report	LD0000908—LD0000938	Hearsay
Legislative Redistricting – Additional Materials			
WX97	4/28/23 Speaker Moore Press Release	LD0001717—LD0001719	Hearsay
WX98	9/25/23 Redraw Process Letter to NCGA	LD0002197—LD0002201	Hearsay
WX99	9/28/23 Common Cause Emails Regarding 2023 Redistricting Process	LD0009230—LD0009231	Hearsay
WX100	9/29/23 Progress NC Action Email	LD0002538—LD0002540	Hearsay
WX101	10/3/23 Redistricting Criteria Letter (Cover Email)	LD0001489—LD0001491	Hearsay
WX102	10/3/23 Redistricting Criteria Letter	LD0001492—LD0001495	Hearsay
WX103	10/5/23 SCSJ Press Release	LD0002298—LD0002299	Hearsay
WX104	10/12/23 Notice to Preserve Records of Redistricting in Anticipation of Litigation	LD0004127—LD0004128	Hearsay
WX105	10/18/23 Senate Notice of Committee Meeting and Bill Sponsor Notice Regarding 10/19/23 Hearing	LD0003777	
WX106	10/22/23 SCSJ Correspondence Regarding Racially Polarized Voting	LD0002305—LD0002306	Hearsay; FRE 403

WX107	10/22/23 Racially Polarized Voting in North Carolina and its Effect on the 2023 Redistricting Plans	LD0002339—LD0002343	Hearsay; FRE 403
WX108	10/22/23 Expert Memo of Dr. Kassra A.R. Oskooii	LD0002319—LD0002338	Hearsay; FRE 403
WX109	2023 Congressional Plan Criteria, https://webservices.ncleg.gov/ViewDocSiteFile/81643	LD0004145; Barber Suppl. Ex. 7	
WX110	Guidance for Drawing State House and Congressional Districts, https://webservices.ncleg.gov/ViewDocSiteFile/87692	LD0004478; Springhetti Ex. 6	
WX111	North Carolina Redistricting – 2011 Public Hearing Information, N.C. Gen. Assemb., https://www.ncleg.gov/Legislation/SupplementalDocs/2011/publichearings/redistricting.		
WX112	Legislative Calendar: September 2021, N.C. Gen Assemb., https://www.ncleg.gov/LegislativeCalendar/9/2021.		
WX113	2011 Redistricting Public Hearing Sites, https://www.ncleg.gov/Files/GIS/ReferenceDocs/2011/2011%20Public%20Hearing%20Site%20Map.pdf.	Hise Ex. 15	
WX114	Joint Meeting of Committees, Criteria Adopted by the Committees (Aug. 12, 2021)	Hise Ex. 20	
Deposition Exhibits			

WX115	Joint Statement by Senator Bob Rucho, Chair of the Senate Redistricting Committee, and Representative David Lewis, Chair of the House Redistricting Committee, released on June 17, 2011	Hise Ex. 1	Hearsay; FRE 404 improper character evidence; FRE 403
WX116	Email from Donna J. Somers to 2023 NC Senate Redistricting Committee Co-Chairs Daniel, Hise, Newton, and Committee Members	Hise Ex. 13, LD0001502-04	Hearsay
WX117	Expert Report of Dr. Jeffrey B. Lewis in *North Carolina League of Conservation Voters v. Hall*, No. 21-CVS-015426	Hise Ex. 23	Hearsay; FRE 701-703, and 705; Fed. R. Civ. P. 26(a)(2) improper/undisclosed expert testimony; FRE 403
WX118	Supplemental Expert Report of Dr. Jeffrey B. Lewis in *North Carolina League of Conservation Voters v. Hall*, No. 21-CVS-015426	Hise Ex. 24	Hearsay; FRE 701-703, and 705; Fed. R. Civ. P. 26(a)(2) improper/undisclosed expert testimony; FRE 403
WX119	Email from Steve Shapiro with subject "Prospective 2024 Congressional Districts – Particular Impact to Guilford County" on 9/19/2023	Hise Ex. 26, LD0001607	Hearsay; FRE 701-703, and 705; Fed. R. Civ. P. 26(a)(2) improper/undisclosed expert testimony; FRE 403
WX120	Email from Anne Brown to Sen. Ralph Hise with subject "Redistributing" on 10/25/2023	Hise Ex. 48, LD0002612	Hearsay
WX121	Email from Steve Shapiro with subject "Suggested Revisions to Congressional Map CCJ-1" on 10/21/2023	Hise Ex. 49, LD0002279	Hearsay; FRE 701-703, and 705; Fed. R. Civ. P. 26(a)(2) improper/undisclosed expert testimony; FRE 403

WX122	Facebook posts from Senator Ralph Hise	Hise Ex. 54	Hearsay; relevance; foundation[7]
WX123	Dot density map comparing 2022 and 2024 Congressional boundaries in Mecklenburg	Hise Ex. 58	Hearsay; authentication
WX124	Dot density map comparing 2022 and 2024 Congressional boundaries in Piedmont Triad	Hise Ex. 57	Hearsay; authentication
WX125	Fred Backus, Anthony Salvanto, Big Majorities Reject Book Bans – CBS News Poll, CBS News (Feb. 22, 2022)	Taylor Ex. 4	Hearsay; relevance; foundation
WX126	Michael J. Pomante II, *Cost of Voting in the American States: 2024*, ELECTION LAW JOURNAL: RULES, POLITICS, AND POLICY	Taylor Ex. 6	Hearsay
WX127	Expert Report of Sean P. Trende in *Agee v. Benson*, No. 1:22-cv-00272 (W.D. Mich.) (Jan. 18, 2023)	Trende Ex. 3	Hearsay; relevance
WX128	*Cheri Beasley's Senate Campaign Latest to Take on Race, Gender Barriers*, Charlotte Post	Hood Ex. 3	Hearsay; relevance; authentication; foundation
WX129	Danielle Battaglia, *NC TV Stations Pull Ad Attacking Senate Candidate Beasley Over Its "False Statements*," News & Observer (Oct. 25, 2022)	Hood Ex. 4	Hearsay
WX130	Will Wright, *Group Targets Beasley with TV Ad About Sex Offender Case*, Charlotte Observer (Oct. 4, 2022)	Hood Ex. 5	Hearsay

[7] Legislative Defendants' lack of foundation objections will be withdrawn if foundation is properly laid at trial.

WX131	Michael Barber and Kosuke Imai, Estimating Neighborhood Effects on Turnout from Geocoded Voter Registration Records	Barber Ex. 4	Hearsay; relevance; foundation
WX132	Bernard Grofman, Lisa Handley, and David Lublin, Drawing Effective Miority [sic] Districts: A Conceptual Framework and Some Empirical Evidence, N.C. Law Review (June 1, 2001)	Alford Suppl. Ex. 4	
WX133	Email from Rep. Destin Hall to Mr. Springhetti re "2023 North Carolina House and Congressional Redistricting" (Aug. 23, 2023)	LD0004475, Springhetti Ex. 4	
Discovery Responses			
WX134	Legislative Defendants' Objections and Responses to *Williams* Plaintiffs' First Set of Interrogatories (May 24, 2024)		Hearsay
WX135	Legislative Defendants' Objections and Responses to *NAACP* Plaintiffs' First Set of Interrogatories (May 24, 2024)		Hearsay
WX136	Responses to Plaintiffs' First Set of Interrogatories to State Board Defendants (June 19, 2024)		Hearsay
WX137	Legislative Defendants' First Amended Privilege Log	Springhetti Ex. 3	Hearsay; foundation
WX138	Legislative Defendants' Third-Party Search Privilege Log		Hearsay; foundation
Maps			
WX139	2022 Interim Congressional Map, https://www.ncleg.gov/Files/GIS/Plans_Main/Co	Springhetti Ex. 16	

	ngress_2022_Court/2022%20Interim%20Congressional%20-%2011%20x%2017%20Map.pdf		
WX140	2022 Interim Congressional Map StatPack Report, https://www.ncleg.gov/Files/GIS/Plans_Main/Congress_2022_Court/2022%20Interim%20Congressional%20-%20StatPack2022_C.pdf		
WX141	Senate Bill 756: Congressional Districts 2023/CBP-5, https://webservices.ncleg.gov/ViewBillDocument/2023/7468/0/Filed%20-%2011%20x%2017%20Map		
WX142	CBP-5 StatPack Report w Race, https://webservices.ncleg.gov/ViewBillDocument/2023/7492/0/Filed%20-%20StatPack%20Report%20w%20Race		
WX143	Realign Congressional Districts 2023/CCJ-1, https://webservices.ncleg.gov/ViewDocSiteFile/81630		
WX144	CCJ-1 StatPack Report, https://webservices.ncleg.gov/ViewDocSiteFile/81632		
WX145	Senate Bill 757: Realign Congressional Districts 2023/CST-4, https://www.ncleg.gov/Files/GIS/Plans_Main/Congress_2023/SL%202023-145%20Congress%20-%2011%20x%2017%20Map.pdf		
WX146	CST-4 StatPack Report w Race, https://www.ncleg.gov/Files/GIS/Plans_Main/Co		

	ngress_2023/SL%202023-145%20Congress%20-%20StatPack2023_RVR_C.pdf		
WX147	Draft maps, LD_MAP_000001-002610.pdf	LD_MAP_000001-002610	
WX148	CCH-1	LD_MAP_001613, Hise Ex. 33	
WX149	CTE-1	LD_MAP_002609, Hise Ex. 35	
WX150	CMT-2	LD_MAP_002334, Hise Ex. 38	
WX151	CCJ-1	LD_MAP_001799, Hise Ex. 42	
WX152	SST-11 Amend	Hise Ex. 52	
WX153	SST-12 Amend	Hise Ex. 53	
WX154	Draft map, CMT-1		Authentication; foundation
WX155	Draft map, CMT-2		Authentication; foundation
WX156	Draft map, CBA-2		Authentication; foundation
WX157	Draft map, CBK-2		Authentication; foundation
WX158	Draft map, CBP-1		Authentication; foundation
WX159	Draft map, CBP-5		Authentication; foundation
WX160	Draft map, CCH-4		Authentication; foundation
WX161	Draft map, CCJ-1		Authentication; foundation

WX162	Draft map, CCL-1	Springhetti Ex. 19	Authentication; foundation
WX163	Draft map, CMT-1		Authentication; foundation
WX164	Draft map, CMT-2		Authentication; foundation
WX165	Draft map, CST-3		Authentication; foundation
WX166	Springhetti draft map, CDs 003	Springhetti Ex. 15	Foundation
WX167	Springhetti draft map, CDs 003 v2	Springhetti Ex. 17	Foundation
WX168	Springhetti draft map, CDs 005	Springhetti Ex. 18	Foundation
Other Bills			
WX169	Filed Version of H.B. 259 (N.C. Mar. 2, 2023), https://webservices.ncleg.gov/ViewBillDocument/2023/1186/0/DRH10127-MHa-59.		Relevance
WX170	Conference Committee Substitute of H.B. 259, https://webservices.ncleg.gov/ViewBillDocument/2023/7268/0/H259-PCCS50044-MHXR-6.		Relevance
WX171	Bill History of House Bill 259 / SL 2023-134, https://www.ncleg.gov/BillLookup/2023/H259		Relevance
WX172	Enacted H.B. 259 (N.C. Oct. 3, 2023), https://www.ncleg.gov/Sessions/2023/Bills/House/PDF/H259v7.pdf		Relevance
Additional Exhibits			
WX173	North Carolina's Population: Short-term Challenges, Long-term Growth Factors, *North Carolina Office of State Budget and Management*		Hearsay

	(May 2021), https://www.osbm.nc.gov/2021-population-dynamics-report/open.		
WX174	Melissa Boughton, *Hofeller Files: Lawmakers Lied to Federal Court in 2017, Preventing NC from Getting Special Election*, NC Newsline (June 6, 2019), https://ncnewsline.com/2019/06/06/hofeller-files-lawmakers-lied-to-federal-court-in-2017-preventing-nc-from-getting-special-election/.		Hearsay; relevance; FRE 404 improper character evidence; FRE 403
WX175	Plaintiffs' Motion for the Court to Issue Direction to Legislative Defendants, *Common Cause v. Lewis*, No. 18 CVS 014001 (N.C. Super. June 6, 2019), https://s3.documentcloud.org/documents/6140151/Common-Cause-v-Lewis-Motion-6-6.pdf.		Hearsay; relevance; FRE 404 improper character evidence; FRE 403
WX176	Amanda E. Ng, et al., *Lack of Reliable Transportation for Daily Living Among Adults: United States, 2022*, NCHS Data Brief No. 490, U.S. Dep't of Health & Hum. Servs. (Jan. 2024), https://www.cdc.gov/nchs/products/databriefs/db490.htm.		Hearsay
WX177	Video: Jesse Helms "Hands" Ad, https://www.youtube.com/watch?v=KIyewCdXMzk; also available at https://www.pbs.org/30secondcandidate/timeline/years/1990_j.html.		Hearsay, relevance, foundation
WX178	Annette Fuller, *Flier Opens an Old Wound*, WINSTON-SALEM JOURNAL (Oct. 21, 2010), https://journalnow.com/news/local/flier-opens-		Hearsay

	an-old-wound/article_77fcaa90-d964-5230-8146-0eb6588ae397.html.		
WX179	Chris Heagarty Sombrero Mailer, https://media.newyorker.com/photos/590959a96552fa0be682d4ef/master/w_1600,c_limit/111010_mayer-sombrero_p465.jpg.		Hearsay; authentication
WX180	Video: "Good Person" CFG Action Ad (NC-SEN), https://www.youtube.com/watch?v=gipaxcSHoaA&ab_channel=ClubforGrowth.		Hearsay; authentication
WX181	Video: Ted Budd For Senate, "Crush the Broken Biden Beasley Agenda," https://www.youtube.com/watch?v=K4IbK9wTgjk.		Hearsay
WX182	Video: Ted Budd for Senate, "The Checkered Flag is in Sight," https://www.youtube.com/watch?v=IMbu7nTMYjQ.		Hearsay
WX183	Jonathan Capehart, *Trump's Flirtation with the N-word Cannot Be Ignored*, WASH. POST (Oct. 8, 2022), https://www.washingtonpost.com/opinions/2022/10/08/trump-n-word-rally-dangerous/.		Hearsay; authentication
WX184	2023 Senate Demographics, https://webservices.ncleg.gov/ViewDocSiteFile/72728.		
WX185	2023 Senate Committees by Member, https://webservices.ncleg.gov/ViewDocSiteFile/72744.		

WX186	M.V. Hood III, Seth Mckee, *True Colors: White Conservative Support for Minority Republican Candidates*, PUBLIC OPINION QUARTERLY (Feb. 2015)		Hearsay; relevance; foundation; FRE 403
WX187	M.V. Hood III et al., *The Rational Southerner: Black Mobilization, Republican Growth, and the Partisan Transformation of the American South*, Chapter 8 (2012)		Hearsay; relevance; foundation; FRE 403
WX188	Christopher A. Cooper et al, *Switching Sides but Still Fighting the Civil War in Southern Politics*, POLITICS, GROUPS, AND IDENTITIES, 10:1, 100-116 (2022)		Hearsay; relevance; foundation; FRE 403
WX189	M.V. Hood III and Seth C. McKee, *Rural Republican Realignment in the Modern South*		Hearsay; relevance; foundation; FRE 403

Exhibit 2

No	Description	References[1]	LD Objections[2]
1	S.L. 2023-145, Map of 2023 Congressional Plan	https://www.ncleg.gov/Files/GIS/Plans_Main/Congress_2023/SL%202023-145%20Congress%20-%2019%20x%2036%20Map.pdf	
2	S.L. 2023-146, Map of 2023 Senate Plan	Hise Dep. Ex. 2; https://www.ncleg.gov/Files/GIS/Plans_Main/Senate_2023/SL%202023-146%20Senate%20-%2019%20x%2036%20Map.pdf	
3	Map of 2023 House Plan	Springhetti Dep. Ex. 14; https://www.ncleg.gov/Files/GIS/Plans_Main/House_2023/SL%202023-149%20House%20-%2019%20x%2036%20Map.pdf	
4	2023 Congressional Plan StatPack with Race	https://www.ncleg.gov/Files/GIS/Plans_Main/Congress_2023/SL%202023-145%20Congress%20-%20StatPack2023_RVR_C.pdf	
5	2023 Senate Plan StatPack with Race	Hise Dep. Ex. 6; https://www.ncleg.gov/Files/GIS/Plans_Main/Senate_2023/SL%202023-146%20Senate%20-%20StatPack2023_RVR_S.pdf	

[1] Legislative Defendants sought clarification on many exhibits on NAACP Plaintiffs' Exhibit List. Information provided in responses to the requests for clarification are included in italics in the reference section. Legislative Defendants relied upon this information in forming their objections to NAACP Plaintiffs' Exhibit List. To the extent further clarifications are provided on the exhibit list, Legislative Defendants reserve the right to amend their objections. Any exhibits withdrawn by NAACP Plaintiffs on 5/29/25 are also noted in italics in the reference section, and the phrase "n/a" appears in the objection column for each withdrawn exhibit.

[2] As referenced in Legislative Defendants' Objections to Plaintiffs' Pretrial Disclosures, in order to streamline objections, Legislative Defendants do not include itemized objections to all exhibits regarding districts that have been dismissed or were never challenged. Instead, Legislative Defendants respectfully request a standing objection based on relevance and Rule 403 (confuses the issues) to Plaintiffs' exhibits to the extent that they reference districts not at issue in the case. The lack of itemized objections and request for a standing objection should not be construed as consent to try claims against districts that have been dismissed or were never asserted.

No	Description	References[1]	LD Objections[2]
6	2023 House Plan StatPack with Race	https://www.ncleg.gov/Files/GIS/Plans_Main/House_2023/SL%202023-149%20House%20-%20StatPack2023_RVR_H.pdf	
7	SB 757 Senate Roll Call Vote Transcript #492	https://www.ncleg.gov/Legislation/Votes/RollCallVoteTranscript/2023/S/492	
8	SB 757 House Roll Call Vote Transcript #613	https://www.ncleg.gov/Legislation/Votes/RollCallVoteTranscript/2023/H/613	
9	SB 758 Senate Roll Call Vote Transcript #499	https://www.ncleg.gov/Legislation/Votes/RollCallVoteTranscript/2023/S/499	
10	SB 758 House Roll Call Vote Transcript #614	https://www.ncleg.gov/Legislation/Votes/RollCallVoteTranscript/2023/H/614	
11	HB 898 Senate Roll Call Vote Transcript #504	https://www.ncleg.gov/Legislation/Votes/RollCallVoteTranscript/2023/S/504	
12	Senate Redistricting Committee meeting transcript, 10/25/23	LD0000373-396	
13	Senate floor transcript, 10/25/23	LD0001900-1979	
14	House Redistricting Committee meeting transcript, 10/25/23	LD0000291-343	
15	House Rules Committee meeting transcript, 10/25/2023	LD0000344-371 *NAACP Plaintiffs represented via email on 5/22/2025 that they intend to include full transcripts as joint exhibits.*	

No	Description	References[1]	LD Objections[2]
16	House floor transcript, 10/25/23	LD0001723-1808 *NAACP Plaintiffs represented via email on 5/22/2025 that they intend to include full transcripts as joint exhibits.*	
17	House Redistricting Committee meeting transcript, 10/25/2023	LD0000291-342 *NAACP Plaintiffs represented via email on 5/22/2025 that they intend to include full transcripts as joint exhibits and will remove this duplicate.* *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
18	SB 757 (Congressional Plan) - Amendment ATU-44-V-2 (Rep. Quick)	https://webservices.ncleg.gov/ViewBillDocument/2023/7625/0/S757-ATU-44-V-2	
19	SB 757 (Congressional Plan) - Amendment ATU-44-V-2 (Rep. Quick) Bill Document; "Congressional Plan 2022"	https://webservices.ncleg.gov/ViewBillDocument/2023/7625/1/S757-BD-NBC-11572	
20	SST-11 Amend and StatPack (Sen. Blue Amendment)	Hise Dep. Ex. 52	
21	Email to Sen. Hise from Anne Brown re: "Redistributing"	Hise Dep. Ex. 48	Hearsay

No	Description	References[1]	LD Objections[2]
22	HB 898 House Roll Call Vote Transcript #604	https://www.ncleg.gov/Legislation/Votes/RollCallVoteTranscript/2023/H/604	
23	SB 757 (Congressional Plan) - Amendment ACL-39-V-2 (Sen. Chaudhuri)	https://webservices.ncleg.gov/ViewBillDocument/2023/7561/0/S757-ACL-39-V-2	
24	SB 758 (Senate Plan) - AND-23-V-2 (Sen. Mohammed)	https://webservices.ncleg.gov/ViewBillDocument/2023/7559/0/S758-AND-23-V-2	
25	SB 758 (Senate Plan) - AND-25-V-2 (Sen. Blue) (Amendment 2)	https://webservices.ncleg.gov/ViewBillDocument/2023/7564/0/S758-AND-25-V-2	
26	Senate Roll Call Vote Transcript #494 (Motion to Table Sen. Blue Amendment 2)	https://www.ncleg.gov/Legislation/Votes/RollCallVoteTranscript/2023/S/494	
27	SB 758 (Senate Plan) - AND-26-V-2 (Sen. Blue) (Amendment 3)	https://webservices.ncleg.gov/ViewBillDocument/2023/7567/0/S758-AND-26-V-2	
28	Senate Roll Call Vote Transcript #495 (Motion to Table Sen. Blue Amendment 3)	https://www.ncleg.gov/Legislation/Votes/RollCallVoteTranscript/2023/S/495	
29	HB 898 (House Plan) - ACL-41-V-2 (Rep. Harrison)	https://webservices.ncleg.gov/ViewBillDocument/2023/7574/0/H898-ACL-41-V-2	

No	Description	References[1]	LD Objections[2]
30	HB 898 (House Plan) - ACL-41-V-2 (Rep. Harrison) Bill Document; "HBA-3 Amend"	https://webservices.ncleg.gov/ViewBillDocument/2023/7574/1/H898-BD-NBC-11534	
31	HB 898 (House Plan) - ATU-42-V-2 (Rep. Reives)	https://webservices.ncleg.gov/ViewBillDocument/2023/7577/0/H898-ATU-42-V-2	
32	HB 898 (House Plan) - ATU-42-V-2 (Rep. Reives) Bill Document; "HCM-6 Amend2"	https://webservices.ncleg.gov/ViewBillDocument/2023/7577/1/H898-BD-NBC-11537	
33	HB 898 (House Plan) - Amendment 3 (Rep. Stevens)	https://webservices.ncleg.gov/ViewBillDocument/2023/7573/0/H898-ABR-81-V-2	
34	HB 898 (House Plan) - Amendment 3 (Rep. Stevens) Bill Document; "HBA-5 Amend"	https://webservices.ncleg.gov/ViewBillDocument/2023/7573/1/H898-BD-NBC-11533 *NAACP Plaintiffs represented via email on 5/29/2025 that they only intend to offer the first page of this exhibit.*	
35	HB 898 (House Plan) - ATU-41-V-3 (Rep. Harrison)	https://webservices.ncleg.gov/ViewBillDocument/2023/7575/0/H898-ATU-41-V-3	
36	HB 898 (House Plan) - ATU-41-V-3 (Rep. Harrison) Bill Document; "HCH-9 Amend"	https://webservices.ncleg.gov/ViewBillDocument/2023/7575/1/H898-BD-NBC-11535 *NAACP Plaintiffs represented via email on 5/29/2025 that they only intend to offer the first page of this exhibit.*	

No	Description	References[1]	LD Objections[2]
37	HB 898 (House Plan) - ACL-42-V-2 (Rep. Harrison)	https://webservices.ncleg.gov/ViewBillDocument/2023/7576/0/H898-ACL-42-V-2	
38	HB 898 (House Plan) - ACL-42-V-2 (Rep. Harrison) Bill Document; "HCM-5 Amend"	https://webservices.ncleg.gov/ViewBillDocument/2023/7576/1/H898-BD-NBC-11536 *NAACP Plaintiffs represented via email on 5/29/2025 that they only intend to offer the first page of this exhibit.*	
39	House Rules Committee meeting transcript, 10/24/2023	LD0000166-183 *NAACP Plaintiffs represented via email on 5/22/2025 that they intend to include full transcripts as joint exhibits.*	
40	House floor transcript 10/24/23	LD0000185-289 *NAACP Plaintiffs represented via email on 5/22/2025 that they intend to include full transcripts as joint exhibits.* *NAACP Plaintiffs represented via email on 5/29/2025 that this exhibit is withdrawn as a duplicate of NAACPPX 42.*	N/a
41	House Redistricting Committee meeting transcript, 10/24/23	LD0000124-164 *NAACP Plaintiffs represented via email on 5/22/2025 that they intend to include full transcripts as joint exhibits.*	
42	House floor transcript, 10/24/23	LD0000185-290	
43	Senate floor transcript, 10/24/23	Hise Dep. Ex. 51; LD0001826-1886 *NAACP Plaintiffs represented via email on 5/22/2025 that they intend to include full transcripts as joint exhibits.*	

No	Description	References[1]	LD Objections[2]
44	SB 758 (Senate Plan) - PCS 45382-ST-57	https://webservices.ncleg.gov/ViewBillDocument/2023/7518/0/S758-PCS45382-ST-57	
45	House Redistricting Committee meeting transcript, 10/23/23	LD0000054-112 *NAACP Plaintiffs represented via email on 5/22/2025 that they intend to include full transcripts as joint exhibits.*	
46	Senate Redistricting Committee meeting transcript, 10/23/23	LD0000784-826 *NAACP Plaintiffs represented via email on 5/22/2025 that they intend to include full transcripts as joint exhibits.*	
47	Email from Chris Shenton to NCGA members including SCSJ VRA Letter and Oskooii analysis	Hise Dep. Ex. 5; LD0002305-2345	Hearsay; FRE 403
48	Email from Steve Shapiro to NCGA members, "Suggested Revisions to Congressional Map CCJ-1" and previous chain	Hise Dep. Ex. 49; LD0002279-2293	Hearsay; FRE 701-703, and 705; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 403
49	SB 757 (Congressional Plan) - PCS (CST-4)	https://webservices.ncleg.gov/ViewBillDocument/2023/7509/0/S757-PCS45380-BK-42	
50	HB 898 (House Plan) - PCS 40522-MT-1	https://webservices.ncleg.gov/ViewBillDocument/2023/7535/0/H898-PCS40522-MT-1	

No	Description	References[1]	LD Objections[2]
51	House Redistricting Committee meeting transcript, 10/19/2023	LD0000001-52 *NAACP Plaintiffs represented via email on 5/22/2025 that they intend to include full transcripts as joint exhibits.*	
52	Senate Redistricting Committee meeting transcript, 10/19/2023	Hise Dep. Ex. 27; LD0000683-783	
53	Senate Redistricting Committee meeting documents (screenshot)	https://www.ncleg.gov/Committees/CommitteeInfo/SenateStanding/154/Documents/16032	
54	2023 Senate Plan Criteria	Hise Dep. Ex. 19; LD0004146; https://webservices.ncleg.gov/ViewDocSiteFile/81635	
55	2023 Congressional Plan Criteria	Hise Dep. Ex. 21; LD0004145; https://webservices.ncleg.gov/ViewDocSiteFile/81634	
56	SB 757 (Congressional Plan) - First Edition (CCJ-1)	https://webservices.ncleg.gov/ViewBillDocument/2023/7448/0/DRS45378-ST-63	
57	Realign Congressional Districts 2023/CCJ-1 - First Edition	https://webservices.ncleg.gov/ViewDocSiteFile/81631	
58	CCJ-1 First Edition StatPack	https://webservices.ncleg.gov/ViewDocSiteFile/81632	
59	CCJ-1 data file	Produced by Legislative Defendants on July 26, 2024 *NAACP Plaintiffs represented via email on 5/22/2025 that this includes LD_MAP_001800-02*	

No	Description	References[1]	LD Objections[2]
60	SB 758 (Senate Plan) - First Edition (SCJ-1)	https://webservices.ncleg.gov/ViewDocSiteFile/81624	
61	Realign NC Senate Districts 2023/SCJ-1 - First Edition	https://webservices.ncleg.gov/ViewDocSiteFile/81622	
62	SCJ-1 First Edition StatPack	https://webservices.ncleg.gov/ViewDocSiteFile/81623	
63	SCJ-1 data file	Produced by Legislative Defendants on July 26, 2024 *NAACP Plaintiffs represented via email on 5/22/2025 that this includes LD_MAP_000203-04*	
64	HB 898 (House Plan) - First Edition (HST-2)	https://webservices.ncleg.gov/ViewDocSiteFile/81604 *NAACP Plaintiffs represented via email on 5/29/2025 that this exhibit is intended to be Springhetti Dep. Ex. 12, not NAACPPPX 65*	
65	House Redistricting Plan 2023/HST-2 - First Edition	https://webservices.ncleg.gov/ViewDocSiteFile/81609; Springhetti Dep. Ex. 12 *NAACP Plaintiffs represented via email on 5/29/2025 that this exhibit is intended to be the hyperlink provided, not Springhetti Dep. Ex. 12*	
66	HST-2 First Edition StatPack	https://webservices.ncleg.gov/ViewDocSiteFile/81607	
67	HST-2 data file	https://webservices.ncleg.gov/ViewDocSiteFile/81610	

No	Description	References[1]	LD Objections[2]
68	SB 756, "Congressional Districts 2023/CBP-5"	https://webservices.ncleg.gov/ViewDocSiteFile/81626	
69	Congressional Districts 2023/CBP-5	https://webservices.ncleg.gov/ViewDocSiteFile/81628	
70	CBP-5 First Edition StatPack	https://webservices.ncleg.gov/ViewDocSiteFile/81629	
71	CBP-5 data fuke	https://www.ncleg.gov/redistricting *NAACP Plaintiffs represented via email on 5/22/2025 that this refers to the BAF file at https://webservices.ncleg.gov/ViewBillDocument/2023/7471/0/Filed%20-%20Block%20Assignment%20File*	
72	Senate Redistricting Committee Meeting notice for 10/19/2023 meeting updated with maps	LD0002294	
73	Senate Redistricting Committee Meeting notice for 10/19/2023 meeting	LD0002202	
74	SCJ-1 Draft Created (Senate Map)	Hise Dep. Ex. 47; LD_MAP_000202	
75	SCJ-1 StatPack	Hise Dep. Ex. 47 (excerpts); LD_MAP_000205-442	
76	Written Public Comments	LD0000850-874	Hearsay; Rule of Completeness

No	Description	References[1]	LD Objections[2]
77	Written Public Comments	LD0000828-848	Hearsay
78	Coalition letter requesting adoption of criteria consistent with *Allen v. Milligan*	Hise Dep. Ex. 22; LD0001489-1495	Hearsay
79	Written Public Comments	LD0000939-946	Hearsay
80	Raleigh Public Hearing Video, 9/27/23	https://www.youtube.com/watch?v=9Q4N4y9MsYo	
81	Raleigh Public Hearing Transcript, 9/27/23	LD0000539-682	
82	Hickory Public Hearing Video, 9/26/23	https://www.youtube.com/watch?v=MyCnIQidVNs	
83	Hickory Public Hearing Transcript, 9/26/23	LD0000436-538	
84	Coalition letter requesting transparent and open redistricting process	Hise Dep. Ex. 16; LD0002196-2201	Hearsay
85	Elizabeth City Public Hearing Video, 9/25/23	https://www.youtube.com/watch?v=UsNRxddye4o	

No	Description	References[1]	LD Objections[2]
86	Elizabeth City Public Hearing Transcript, 9/25/23	LD0000397-435	
87	SL 2023-134 (2023 Appropriations Act) ratified, repealed GS section making redistricting records public records	https://www.ncleg.gov/Sessions/2023/Bills/House/PDF/H259v7.pdf *NAACP Plaintiffs represented via email on 5/29/2025 that they intend to excerpt pages 1 and 530 of this document to conserve resources.*	Relevance; foundation[3]
88	HB 259 (2023 Appropriations Act) Proposed Committee Substitute H259-PCCS50044-MHxr-6	https://webservices.ncleg.gov/ViewBillDocument/2023/7266/0/H259-PCCS50044-MHXR-6 *NAACP Plaintiffs represented via email on 5/29/2025 that they intend to excerpt pages 1 and 530 of this document to conserve resources.*	Relevance; foundation
89	Email from Steve Shapiro to NCGA members, "RE: Prospective 2024 Congressional Districts--Particular Impact to Guilford County"	Hise Dep. Ex. 26; LD0001607-1622	Hearsay; FRE 701-703, and 705; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 403; Rule of Completeness

[3] Legislative Defendants' lack of foundation objections will be withdrawn if foundation is properly laid at trial.

No	Description	References[1]	LD Objections[2]
90	Senate Calendar Notice of Committee Meetings for Elizabeth City, Hickory, and Raleigh Public Hearings	https://calendars.ncleg.gov/CalendarDoc/2023/8601/Senate%20Calendar	
91	Notice of Committee Meetings via email to Sen. Hise	Hise Dep. Ex. 12	
92	Elizabeth City Public Hearing Speaker Request Form	https://www.ncleg.gov/RequestToSpeak/69	Rule 403 (needlessly cumulative, wasting time)
93	Hickory Public Hearing Speaker Request Form	https://www.ncleg.gov/RequestToSpeak/70	Rule 403 (needlessly cumulative, wasting time)
94	Raleigh Public Hearing Speaker Request Form	https://www.ncleg.gov/RequestToSpeak/71	Rule 403 (needlessly cumulative, wasting time)
95	Email notification to Sen. Hise re: Redistricting Conference Call	Hise Dep. Ex. 11; LD0004204	
96	Email from Rep. Hall to Rep. Reives indicating that a room was available for drawing legislative and Congressional districts	Harrison Dep. Ex. 1; Harrison 00015	

No	Description	References[1]	LD Objections[2]
97	Email from Rep. Destin Hall to Blake Springhetti sharing "Guidance for Drawing State House and Congressional Districts" and current member residences	LD0004475; Harrison Dep. Ex. 20A; Harrison 00016-00022; Springhetti Dep. Ex. 4	
98	Guidance for Drawing State House and Congressional Districts	https://webservices.ncleg.gov/ViewDocSiteFile/87692; LD00004478; Springhetti Dep. Ex. 4	
99	Email to Sen. Hise re: "The Guardian U.S. interview request: Moore v. Harper and Allen v. Milligan rulings"	Hise Dep. Ex. 9	Hearsay
100	HB 259 - Senate Passed Version	https://www.ncleg.gov/Sessions/2023/Bills/House/PDF/H259v5.pdf *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
101	Speaker Moore press release re: intent to redraw districts	LD0001717-1719	Foundation

No	Description	References[1]	LD Objections[2]
102	HB 259 - House Passed Version	https://www.ncleg.gov/Sessions/2023/Bills/House/PDF/H259v3.pdf *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
103	Senate Bill 756 Bill History	https://www.ncleg.gov/BillLookUp/2023/S756	
104	Senate Bill 757 Bill History	https://www.ncleg.gov/BillLookUp/2023/S757	
105	Senate Bill 758 Bill History	https://www.ncleg.gov/BillLookUp/2023/S758	
106	House Bill 898 Bill History	https://www.ncleg.gov/BillLookUp/2023/H898	
107	House Bill 259 Bill History	https://www.ncleg.gov/BillLookup/2023/H259	Relevance; foundation
108	SST-12 Amend and StatPack (Blue Amendment)	Hise Dep. Ex. 53	
109	Duke House Groupings	https://webservices.ncleg.gov/ViewDocSiteFile/41063	
110	Duke Senate Groupings	https://webservices.ncleg.gov/ViewDocSiteFile/38491	
111	Public Comment Portal	Hise Dep. Ex. 14; https://www.ncleg.gov/RequestForComments/45	
112	CST-3	LD_MAP_002500	
113	CST-3 StatPack	LD_MAP_002503-2608	
114	CCL-1	LD_MAP_001985	
115	CCL-1 StatPack	LD_MAP_001988-2169	
116	CCJ-1	Hise Dep. Ex. 42; LD_MAP_001799	

No	Description	References[1]	LD Objections[2]
117	CCJ-1 StatPack	Hise Dep. Ex. 42; LD_MAP_001803-1984	
118	$R85PEKP Map	Springhetti Dep. Ex. 9	Authentication; foundation
119	HD35 and HD66 Split VTD Zoom and Demographics (DRA screengrabs using unmodified shapefiles provided by counsel)	Springhetti Dep. Ex. 10	Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony
120	CDs 005 baf	Produced by Legislative Defendants on July 26, 2024 *NAACP Plaintiffs represented via email on 5/27/2025 that this refers to data files produced in LD_MAP_002610 (Blake Springhetti Backup)*	
121	HDs 005 baf	Springhetti Dep. Ex. 11 *NAACP Plaintiffs represented via email on 5/27/2025 that Exhibit No. 11 is the exhibit, and Ex. 462 is the corresponding "data file."*	Foundation
122	CCH-4	Hise Dep. Ex. 40; LD_MAP_001614	
123	CCH-4 StatPack	LD_MAP_001617-1798	
124	STU-1	Hise Dep. Ex. 45; LD_MAP_000682	
125	STU-1 StatPack	Hise Dep. Ex. 45; LD_MAP_000685-920	
126	SST-3	LD_MAP_000443	
127	SST-3 StatPack	LD_MAP_000446-681	
128	CCC-1	Hise Dep. Ex. 39; LD_MAP_001611	
129	CCC-2	LD_MAP_001612	
130	CST-2	Hise Dep. Ex. 41; LD_MAP_002499	
131	SCH-1	LD_MAP_000200	
132	SCH-2	LD_MAP_000201	

No	Description	References[1]	LD Objections[2]
133	CBR-1 (Mecklenburg)	LD_MAP_1606	
134	CBR-5	LD_MAP_001609	
135	CMT-1	Hise Dep. Ex. 37; LD_MAP_002171	
136	CMT-1 StatPack	Hise Dep. Ex. 37; LD_MAP_002174-0023333	
137	CMT-2	Hise Dep. Ex. 38; LD_MAP_002334	
138	CMT-2 StatPack	Hise Dep. Ex. 38; LD_MAP_002337-2498	
139	SCC-1	Hise Dep. Ex. 44; LD_MAP_000001	
140	SCC-1 StatPack	Hise Dep. Ex. 44; LD_MAP_000004-199	
141	CCM-1	Hise Dep. Ex. 36; LD_MAP_002170	
142	SCM-1	Hise Dep. Ex. 43; LD_MAP_000921	
143	CCH-1	Hise Dep. Ex. 33; LD_MAP_001613	
144	CTE-1	Hise Dep. Ex. 35; LD_MAP_002609	
145	Guilford v2	Springhetti Dep. Ex. 7	Foundation
146	CDs 003	Produced by Legislative Defendants on July 26, 2024 *NAACP Plaintiffs represented via email on 5/27/2025 that this refers to data files produced in LD_MAP_002610 (Blake Springhetti Backup)*	
147	CDs 003 v2	Produced by Legislative Defendants on July 26, 2024 *NAACP Plaintiffs represented via email on 5/27/2025 that this refers to data files produced in LD_MAP_002610 (Blake Springhetti Backup)*	
148	Meck v2	Springhetti Dep. Ex. 8	Foundation
149	CBA-2	LD_MAP_000922-924	
150	CBA-2 StatPack	LD_MAP_000925-1090	
151	CBK-2	LD_MAP_001091	
152	CBK-2 StatPack	LD_MAP_001094-1255	

No	Description	References[1]	LD Objections[2]
153	CBW-1	LD_MAP_001610	
154	CBP-4	LD_MAP_001420	
155	CBP-5	Hise Dep. Ex. 30; LD_MAP_001421	
156	CBP-5 StatPack	Hise Dep. Ex. 30 (excerpts); LD_MAP_001425-1604	
157	CBP-5 Data file	Produced by Legislative Defendants on July 26, 2024 *NAACP Plaintiffs represented via email on 5/22/2025 that this refers to LD_MAP_001422-24*	
158	CBP-6	Hise Dep. Ex. 31; LD_MAP_001605	\
159	CBP-1	Hise Dep. Ex. 28; LD_MAP_1256	
160	CBP-1 StatPack	Hise Dep. Ex. 28 (excerpts); LD_MAP_001259-1418	
161	CBP-1 data file	Hise Dep. Ex. 29 *NAACP Plaintiffs represented via email on 5/29/2025 that this is intended to be the file at slipsheet LD_MAP_001257-58 and not Hise Dep. Ex. 29 (which is included among summary exhibits for CBP-1 at NAACPPX 432-433).*	
162	CBP-2	LD_MAP_001419	
163	Individual Plaintiffs Voting Records - Confidential - Attorneys Eyes Only	NAACPPS_0001509-1537	Hearsay; foundation; relevance & FRE 403 (confuses the issues) as to NAACPPS_0001533-1537
164	NAACP Member Voting Records - Confidential - Attorneys Eyes Only	NAACPPS_0005644-5718	Hearsay; foundation

No	Description	References[1]	LD Objections[2]
165	Common Cause Member Voting Records - Confidential - Attorneys Eyes Only	NAACPPS_0005538-5693	Hearsay, foundation; relevance and FRE 403 (confuses the issues) as to NAACPPS_0005547-5554, NAACPPS_0005607-5613, NAACPPS_0005614-5620, NAACPPS_0005621-5629
166	SD8 NAACP Member Voting Record - Confidential - Attorneys Eyes Only	NAACPPS_0005719-5722	Hearsay; foundation
167	Join the NAACP Webpage	Maxwell Dep. Ex. 11	
168	NAACP DEI Statement 2024	NAACPPS_0001030-1034	Hearsay; relevance
169	NAACP Home Page - Mission	NAACPPS_0001027-1029	Hearsay
170	NAACP Moore v Harper Email	NAACPPS_0002172-2174	Hearsay
171	NAACP Opposes SB 406	NAACPPS_0002183-2184	Hearsay; relevance
172	ACP Opposing Stricter Election Laws 2023	NAACPPS_0002181-2182	Hearsay; relevance
173	NAACP Resolutions email 2023	NAACPPS_0002189-2191	Hearsay; relevance
174	NAACP Social Media on Rehearings 2023	NAACPPS_0003417-3417	Hearsay

No	Description	References[1]	LD Objections[2]
175	NAACP Voter Engagement 2023	NAACPPS_0003426-3426	Hearsay; relevance
176	Resolution Opposing HB 304	NAACPPS_0005456-5456	Hearsay; relevance
177	2024 General Election Turnout	https:/www.ncsbe.gov/results-data/voter-turnout/2024-general-election-turnout	
178	Email subject "Urgent: Northeastern Community Zoom Meeting re: Redistricting"	NAACPPS_0005325-5327	Hearsay
179	Leloudis Expert Report		Hearsay*[4]
180	Bagley Corrected Expert Report	*NAACP Plaintiffs represented via email on 5/29/2025 that this is intended to be the Bagley Expert Report dated August 1, 2024*	Hearsay*
181	Bagley Errata	*NAACP Plaintiffs represented via email on 5/29/2025 that this is intended to be the Bagley Corrected Report dated November 4, 2024*	Hearsay*
182	Fairfax Corrected Expert Report		Hearsay*
183	Fairfax Errata		Hearsay*
184	Fairfax Exhibit A		Hearsay*
185	Fairfax Exhibit B		Hearsay*
186	Fairfax Exhibit C		Hearsay*
187	Fairfax Exhibit D		Hearsay*

[4] Hearsay* = Objection will be withdrawn pursuant to the parties' stipulation that the full reports of experts who testify at trial shall be admitted as exhibits subject to any *Daubert*/Rule 702 challenges. D.E. 115 at ¶4.

No	Description	References[1]	LD Objections[2]
188	Fairfax Corrected Exhibit E		Hearsay*
189	Oskooii Expert Report		Hearsay*
190	Oskooii Appendix A		Hearsay*
191	Oskooii Appendix B		Hearsay*
192	Oskooii Appendix C		Hearsay*
193	Oskooii Appendix D		Hearsay*
194	Oskooii Appendix E		Hearsay*
195	Stephens-Dougan Expert Report		Hearsay*
196	Stephens-Dougan Errata		Hearsay*
197	Stephens-Dougan Exhibit A		Hearsay*
198	Stephens-Dougan Exhibit B		Hearsay*
199	Bagley Reply Report	*NAACP Plaintiffs represented via email on 5/29/2025 that this is intended to be the Bagley Reply Report dated October 17, 2024*	Hearsay*
200	Fairfax Reply Report		Hearsay*
201	Fairfax Reply Materials		Hearsay*
202	Oskooii Reply Report		Hearsay*
203	Oskooii Supplement re: Alford Errata		Hearsay*
204	Stephens-Dougan Reply Report		Hearsay*

No	Description	References[1]	LD Objections[2]
205	Bagley Supplemental Report	*NAACP Plaintiffs represented via email on 5/29/2025 that this is intended to be the Bagley Supplemental Expert Report dated March 17, 2025*	Hearsay*
206	Bagley Supplement Errata	*NAACP Plaintiffs represented via email on 5/29/2025 that this is intended to be the Bagley Supplemental Errata dated April 16, 2025*	Hearsay*
207	Bagley Supplement Pivot Table	*NAACP Plaintiffs represented via email on 5/29/2025 that this is intended to be the Bagley Pivot Table disclosed to Defendants via email on March 20, 2025*	Hearsay*
208	Oskooii Supplemental Report		Hearsay*
209	Oskooii Supplement Appendix A		Hearsay*
210	Oskooii Supplement Appendix B		Hearsay*
211	Oskooii Supplement Appendix C		Hearsay*
212	Stephens-Dougan Supplemental Report		Hearsay*
213	Stephens-Dougan Supplement Exhibit A		Hearsay*
214	Stephens-Dougan Supplement Exhibit B		Hearsay*
215	Oskooii Supplemental Rebuttal		Hearsay*

No	Description	References[1]	LD Objections[2]
216	Fairfax Supplemental Rebuttal		Hearsay*
217	2021-22 State House Representatives List	https://webservices.ncleg.gov/ViewDocSiteFile/8107	
218	2021-22 State Senate Representatives List	https://webservices.ncleg.gov/ViewDocSiteFile/6210	
219	Valerie Jordan for NC Senate - Meet Valerie	Oskooii Reply, fn. 4; https://valeriejordan.com/meet-valerie/	Hearsay; relevance; authentication
220	2024 State House Electoral Results	https://er.ncsbe.gov/?election_dt=11/08/2022&county_id=0&office=NCH&contest=0	
221	2022 State Senate Electoral Results	https://er.ncsbe.gov/?election_dt=11/08/2022&county_id=0&office=NCS&contest=0	
222	2022 Congressional Electoral Results	https://er.ncsbe.gov/?election_dt=11/08/2022	
223	2024 State House Electoral Results	https://er.ncsbe.gov/?election_dt=11/05/2024&county_id=0&office=NCH&contest=0	
224	2024 State Senate Electoral Results	https://er.ncsbe.gov/?election_dt=11/05/2024&county_id=0&office=NCS&contest=0	
225	2024 Congressional Electoral Results	https://er.ncsbe.gov/?election_dt=11/05/2024&county_id=0&office=FED&contest=0	
226	SL 2022-3 Congress (2022 Remedial Congressional Plan)	https://www.ncleg.gov/Files/GIS/Plans_Main/Congress_2022/SL%202022-3%20Congress%20-%2011%20x%2017%20Map.pdf	
227	2022 Interim Congressional Plan	Hise Dep. Ex. 56; https://www.ncleg.gov/Files/GIS/Plans_Main/Congress_2022_Court/2022%20Interim%20Congressional%20-%2011%20x%2017%20Map.pdf	

No	Description	References[1]	LD Objections[2]
228	S.L. 2022-4 House Map	https://webservices.ncleg.gov/ViewBillDocument/2021/53787/0/SL%202022-4%20-%2011%20x%2017%20Map	
229	S.L. 2022-4 StatPack	https://www.ncleg.gov/Files/GIS/Plans_Main/House_2022/SL%202022-4%20House%20-%20StatPack2022_H.pdf	
230	S.L. 2022-2 Senate	Hise Dep. Ex. 3; https://www.ncleg.gov/Files/GIS/Plans_Main/Senate_2022/SL%202022-2%20Senate%20-%2011%20x%2017%20Map.pdf	
231	S.L. 2021-174 Congressional Map	https://webservices.ncleg.gov/ViewBillDocument/2021/53440/0/SL%202021-174%20-%2011%20x%2017%20Map	
232	S.L. 2021-175 House Map	https://webservices.ncleg.gov/ViewBillDocument/2021/53424/0/SL%202021-175%20-%2011%20x%2017%20Map	
233	S.L. 2021-175 StatPack	https://www.ncleg.gov/Files/GIS/Plans_Main/House_2021/SL%202021-175%20House%20-%20StatPack%20Report.pdf	
234	S.L. 2021-173 Senate	Hise Dep. Ex. 4; https://www.ncleg.gov/Files/GIS/Plans_Main/Senate_2021/SL%202021-173%20Senate%20-%2011%20x%2017%20Map.pdf	
235	11/1/2021 Audio of Senate Committee Hearing	https://webservices.ncleg.gov/ViewDocSiteFile/35152	
236	Senate Committee on Redistricting and Elections Agenda (Webex)	https://webservices.ncleg.gov/ViewDocSiteFile/38495	
237	Senate Committee on Redistricting and Elections Agenda (In-Person Comments)	https://webservices.ncleg.gov/ViewDocSiteFile/38494	

No	Description	References[1]	LD Objections[2]
238	Senate Committee on Redistricting and Elections Agenda (Webex)	https://webservices.ncleg.gov/ViewDocSiteFile/38493	
239	Senate Committee on Redistricting and Elections Agenda (In-Person Comments)	https://webservices.ncleg.gov/ViewDocSiteFile/38492	
240	Senate Announcement re: Public Mapdrawing	https://calendars.ncleg.gov/CalendarDoc/2021/7394/Senate%20Calendar	
241	9/14/2021 Elisabeth City Public Hearing	https://webservices.ncleg.gov/ViewDocSiteFile/35090	
242	2021 Joint Public Hearing Schedule	https://webservices.ncleg.gov/ViewDocSiteFile/38541	
243	2021-08-12 Committee (Joint)	https://youtu.be/gSm2OhE7Slk?si=oD8a4ZwUV0ou4o3	
244	Senate Calendar	https://calendars.ncleg.gov/CalendarDoc/2021/7232/Senate%20Calendar *NAACP Plaintiffs represented via email on 5/29/2025 that this is withdrawn as a duplicate of NAACPPX245*	N/a
245	Senate Calendar for Legislative Day 116	https://calendars.ncleg.gov/CalendarDoc/2021/7232/Senate%20Calendar	
246	8/12/2021 Joint Elections Committee Hearing	Record Evidence from *Harper v. Hall* (2021)	

No	Description	References[1]	LD Objections[2]
247	Criteria Adopted by the House Committee on Redistricting and Senate Committee on Redistricting and Elections	Hise Dep. Ex. 20; https://webservices.ncleg.gov/ViewDocSiteFile/38467	
248	Amendment to Proposed Criteria -- Voting Rights Act (Sen. Blue)	https://webservices.ncleg.gov/ViewDocSiteFile/38483	Foundation; Rule 403 (needlessly cumulative, wasting time)
249	Amendment to Proposed Criteria (Contiguity Amendment)	https://webservices.ncleg.gov/ViewDocSiteFile/41043	Foundation; Rule 403 (needlessly cumulative, wasting time)
250	Amendment to Proposed Criteria (Racial Data Amendment)	https://webservices.ncleg.gov/ViewDocSiteFile/41044	Foundation; Rule 403 (needlessly cumulative, wasting time)
251	2021 Joint Redistricting Committee Proposed Criteria	https://webservices.ncleg.gov/ViewDocSiteFile/41039	Rule 403 (needlessly cumulative, wasting time)
252	House Committee on Redistricting Agenda	https://webservices.ncleg.gov/ViewDocSiteFile/41036	
253	Senate Calendar for Legislative Day 110	https://calendars.ncleg.gov/CalendarDoc/2021/7203/Senate%20Calendar	
254	NCGA ISD Policies	https://webservices.ncleg.gov/ViewDocSiteFile/41037	Foundation
255	HB 1029 3rd Edition	https://www.ncleg.gov/Files/GIS/Plans_Main/Congress_2019/HB1029%203rd%20Edition%20-%2011x17_Map.pdf	

No	Description	References[1]	LD Objections[2]
256	Senate Calendar for Legislative Day 127	https://calendars.ncleg.gov/CalendarDoc/2019/5214/Senate%20Calendar	
257	2017 Redistricting Public Hearing Sites	https://webservices.ncleg.gov/ViewDocSiteFile/45803	
258	House Calendar for 2nd Legislative Day, Extra Session	https://webservices.ncleg.gov/ViewDocSiteFile/54147	
259	2016 Contingent Congressional Plan - Corrected	https://www.ncleg.gov/Files/GIS/ReferenceDocs/2016/2016_Contingent_Congressional_Plan_-_Corrected.pdf	
260	Lewis-Dollar-Dockham 4 (Lewis-Dollar-Dockham 3, as amended)	https://www.ncleg.gov/Files/GIS/Plans_Process2011/House/Lewis-Dollar-Dockham_4.pdf	
261	Rucho Senate 2	https://www.ncleg.gov/Files/GIS/Plans_Process2011/Senate/Rucho_Senate_2.pdf	
262	Rucho-Lewis Congress 3	https://www.ncleg.gov/Files/GIS/Plans_Main/Congress_2011/mapSimple.pdf	
263	Joint Statement by Senator Bob Rucho and Representative David Lewis Regarding Proposed State Legislative Redistricting Plans	https://www.ncleg.gov/Files/GIS/ReferenceDocs/2011/Joint%20Statement%20by%20Senator%20Bob%20Rucho%20and%20Representative%20David%20Lewis_7-12-11.pdf	Hearsay; FRE 404 improper character evidence; FRE 403 (unfair prejudice)

No	Description	References[1]	LD Objections[2]
264	Statement by Senator Bob Rucho and Representative David Lewis Regarding the Proposed 2011 Congressional Plan	https://www.ncleg.gov/Files/GIS/ReferenceDocs/2011/Joint%20Statement%20by%20Senator%20Bob%20Rucho%20and%20Representative%20David%20Lewis_7.1.11.pdf	Hearsay; FRE 404 improper character evidence; FRE 403 (unfair prejudice)
265	Statement by Sen. Bob Rucho and Rep. David Lewis Regarding Proposed VRA Districts	https://www.ncleg.gov/Files/GIS/ReferenceDocs/2011/Joint%20Statement%20by%20Senator%20Bob%20Rucho%20and%20Representative%20David%20Lewis_6.22.11.pdf	Hearsay; FRE 404 improper character evidence; FRE 403 (unfair prejudice)
266	Joint Statement by Senator Bob Rucho, Chair of Senate Redistricting Committee, and Representative David Lewis, Chair of the House Redistricting Committee, released on June 17, 2011	Hise Dep. Ex. 1; https://www.ncleg.gov/Files/GIS/ReferenceDocs/2011/Joint%20Statement%20by%20Senator%20Bob%20Rucho%20and%20Representative%20David%20Lewis_6.17.11.pdf	Hearsay; FRE 404 improper character evidence; FRE 403 (unfair prejudice)
267	Congress Zero Deviation	https://www.ncleg.gov/Files/GIS/Plans_Process2011/Congress/Congress_ZeroDeviation.pdf	
268	Senate Calendar	https://webservices.ncleg.gov/ViewDocSiteFile/55304 *NAACP Plaintiffs represented via email on 5/29/2025 that this is withdrawn as a duplicate of NAACPPX269*	N/a
269	Senate Calendar for Legislative Day 37	https://webservices.ncleg.gov/ViewDocSiteFile/55304	

No	Description	References[1]	LD Objections[2]
270	Congress ZeroDeviation	https://www.ncleg.gov/Files/GIS/Plans_Main/Congress_2001/mapSimple.pdf	
271	Corrected House Calendar for 164th Legislative Day	https://webservices.ncleg.gov/ViewDocSiteFile/52878	
272	Senate Calendar for Legislative Day 123	https://webservices.ncleg.gov/ViewDocSiteFile/54428	
273	House Calendar for 55th Legislative Day	https://webservices.ncleg.gov/ViewDocSiteFile/52768	
274	S.L. 2021-180 ("2021 Appropriations Act") Bill History	https://www.ncleg.gov/BillLookup/2021/S105	Relevance; foundation
275	S.L. 2021-175 ("House Redistricting Plan 2021/HSA-9") Bill History	https://www.ncleg.gov/BillLookUp/2021/H976	
276	S.L. 2021-173 ("Senate Redistricting Plan 2021/SBK-7") Bill History	https://www.ncleg.gov/BillLookUp/2021/S739	
277	S.L. 2021-174 ("Congressional Redistricting Plan 2021/CST-13") Bill History	https://www.ncleg.gov/BillLookUp/2021/S740	
278	February 2016 Legislative Calendar	Hise Dep. Ex. 15; https://www.ncleg.gov/LegislativeCalendar/2/2016	

No	Description	References[1]	LD Objections[2]
279	2011 Redistricting Public Hearing Sites List	https://www.ncleg.gov/Legislation/SupplementalDocs/2011/publichearings/redistricting	
280	2011 Redistricting Public Hearing Sites Map	Hise Dep. Ex. 15; https://www.ncleg.gov/Files/GIS/ReferenceDocs/2011/2011%20Public%20Hearing%20Site%20Map.pdf	
281	S.L. 2011-145 ("Appropriations Act of 2011") Bill History	https://www.ncleg.gov/BillLookup/2011/h200	Relevance; foundation
282	2011 Redistricting Process Archive	https://www.ncleg.gov/Redistricting/Process2011	FRE 403 (needlessly cumulative, wasting time)
283	S.L. 2011-404 ("Lewis-Dollar-Dockham 3") Bill History	https://www.ncleg.gov/BillLookUp/2011/H937	
284	S.L. 2011-402 ("Rucho Senate 2") Bill History	https://www.ncleg.gov/BillLookUp/2011/S455	
285	S.L. 2011-403 ("Rucho-Lewis Congress 3") Bill History	https://www.ncleg.gov/BillLookUp/2011/S453	
286	Senate Bill 1005 / House Bill 1040 ("The Appropriations Act of 2001)	https://www.ncleg.gov/BillLookup/2001/s1005	Relevance; foundation
287	2001 Redistricting Public Hearing Sites	Hise Dep. Ex. 15; https://www.ncleg.gov/Files/GIS/ReferenceDocs/2011/2001%20Public%20Hearing%20Site%20Map.pdf	

No	Description	References[1]	LD Objections[2]
288	S.L. 2001-424 ("The Appropriations Act of 2001") Bill History	https://www.ncleg.gov/BillLookup/2001/s1005	Relevance; foundation
289	S.L. 2001-479 ("Congress ZeroDeviation") Bill History	https://www.ncleg.gov/BillLookUp/2001/H32	
290	S.L. 2001-459 ("House Redistricting - Sutton Plan 2") Bill History	https://www.ncleg.gov/BillLookUp/2001/H1025	
291	S.L. 2001-458 ("Senate Redistricting - 1C") Bill History	https://www.ncleg.gov/BillLookUp/2001/S798	
292	98 Congressional Plan A	https://www.ncleg.gov/Files/GIS/Plans_Main/Congress_1998/mapSimple.pdf	
293	97 House/Senate Plan A	https://www.ncleg.gov/Files/GIS/Plans_Main/Congress_1997/mapSimple.pdf	
294	1992 Congressional Base Plan #10	https://www.ncleg.gov/Files/GIS/Plans_Main/Congress_1992/mapSimple.pdf	
295	2022 House Map with BVAP	https://davesredistricting.org/join/6f1cd8e9-bd3e-4be9-97e9-6625509dabee *NAACP Plaintiffs represented via email on 5/29/2025 that this is withdrawn as a duplicate of NAACPPX 440*	N/a

No	Description	References[1]	LD Objections[2]
296	2021 House Map with BVAP	https://davesredistricting.org/join/8ae16f76-0716-4392-bc64-abf00251cb48 *NAACP Plaintiffs represented via email on 5/29/2025 that this is withdrawn as a duplicate of NAACPPX 441*	N/a
297	North Carolina General Assembly Redistricting, "District Plans Enacted or Ordered by the Court" (screenshot)	https://www.ncleg.gov/redistricting	FRE 403 (needlessly cumulative, wasting time)
298	Senator Bobby Hanig Weekly Newsletter	https://bobbyhanig.net/wp-content/uploads/2025/04/Gmail-Hanigs-Headlines-411.pdf	Authentication; foundation; hearsay; relevance
299	H.R. 22 ("SAVE Act") Bill Text and Cosponsors	https://www.congress.gov/bill/119th-congress/house-bill/22/text?s=2&r=76; https://www.congress.gov/bill/119th-congress/house-bill/22/cosponsors?s=2&r=76	Foundation; relevance; FRE 403 (confuses the issues); FRE 404 improper character evidence
300	S.B. 558 ("Eliminating 'DEI' in Public Higher Ed") Bill History	https://www.ncleg.gov/BillLookUp/2025/S558	Foundation; relevance; FRE 404 improper character evidence
301	S.B. 558 Filed Edition	https://www.ncleg.gov/Sessions/2025/Bills/Senate/PDF/S558v0.pdf	Foundation; relevance; FRE 404 improper character evidence
302	S.B. 403 ("Medicaid Work Requirements") Bill History	https://www.ncleg.gov/BillLookup/2025/S403	Foundation; relevance; FRE 404 improper character evidence
303	S.B. 403 Filed Edition	https://www.ncleg.gov/BillLookup/2025/S403	Foundation; relevance; FRE 404 improper character evidence

No	Description	References[1]	LD Objections[2]
304	S.B. 333 ("Prohibit Illegal Accreditation Requirements") Bill History	https://www.ncleg.gov/BillLookUp/2025/S333	Foundation; relevance; FRE 404 improper character evidence
305	S.B. 333 Filed Edition	https://www.ncleg.gov/Sessions/2025/Bills/Senate/PDF/S333v0.pdf	Foundation; relevance; FRE 404 improper character evidence
306	H.R. 2204 ("To require an institution of higher education that becomes aware that a student having nonimmigrant status under subparagraph (F)(i) or (J) of section 101(a)(15) of the Immigration and Nationality Act (8 U.S.C. 1101(a)(15)) has endorsed or supported a foreign terrorist organization to notify the SEVIS, and for other purposes.")	https://www.congress.gov/bill/119th-congress/house-bill/2204/cosponsors?s=3&r=8	Foundation; relevance; FRE 403 (confuses the issues); FRE 404 improper character evidence
307	S.B. 227 ("Eliminating 'DEI' in Public Higher Ed") Bill History	https://www.ncleg.gov/BillLookUp/2025/S227	Foundation; relevance; FRE 404 improper character evidence
308	S.B. 227 Filed Edition	https://www.ncleg.gov/Sessions/2025/Bills/Senate/PDF/S227v0.pdf	Foundation; relevance; FRE 404 improper character evidence

No	Description	References[1]	LD Objections[2]
309	Congressman Addison McDowell's Post re: Forsyth County Schools	https://www.facebook.com/61570560188179/posts/12212175 9164685339/?mibextid=wwXIfr&rdid=fB5N9iFUmZBfpnNR #	Authentication; foundation; relevance; FRE 403 (confuses the issues); FRE 404 improper character evidence
310	S.B. 153 ("North Carolina Border Protection Act") Bill History	https://www.ncleg.gov/BillLookUp/2025/S153	Foundation; relevance; FRE 404 improper character evidence
311	S.B. 153 Filed Edition	https://www.ncleg.gov/Sessions/2025/Bills/Senate/PDF/S153 v0.pdf	Foundation; relevance; FRE 404 improper character evidence
312	H.B. 127 ("Voter Registration Drive Form") Bill History	https://www.ncleg.gov/BillLookUp/2025/h127	Foundation; relevance; FRE 404 improper character evidence
313	H.B. 127 Filed Edition	https://www.ncleg.gov/Sessions/2025/Bills/House/PDF/H127 v0.pdf	Foundation; relevance; FRE 404 improper character evidence
314	H.B. 66 ("Reduce Early Voting Period") Bill History	https://www.ncleg.gov/BillLookUp/2025/h66	Foundation; relevance; FRE 404 improper character evidence
315	H.B. 66 Filed Edition	https://www.ncleg.gov/Sessions/2025/Bills/House/PDF/H66v 0.pdf	Foundation; relevance; FRE 404 improper character evidence
316	H.R. 925 ("Dismantle DEI Act of 2025")	https://www.congress.gov/bill/119th-congress/house-bill/925/cosponsors?s=3&r=32	Foundation; relevance; FRE 403 (confuses the issues); FRE 404 improper character evidence
317	H.R. 32 ("No Bailout for Sanctuary Cities Act") Bill Text and Cosponsors	https://www.congress.gov/bill/119th-congress/house-bill/32/text?s=2&r=73; https://www.congress.gov/bill/119th-congress/house-bill/32/cosponsors?s=2&r=73	Foundation; relevance; FRE 403 (confuses the issues); FRE 404 improper character evidence

No	Description	References[1]	LD Objections[2]
318	S.B. 921 (S.L. 2024-58, "Constitutional Amendment Requiring Photo ID for All Voters") Bill History	https://www.ncleg.gov/BillLookup/2023/S921	Foundation; relevance; FRE 403 (confuses the issues as this bill is not challenged in this litigation)
319	S.L. 2024-58	https://www.ncleg.gov/Sessions/2023/Bills/Senate/PDF/S921v3.pdf	Foundation; relevance; FRE 403 (confuses the issues as this bill is not challenged in this litigation)
320	H.R. 10013 ("Education Not Agitation Act of 2024")	https://www.congress.gov/bill/118th-congress/house-bill/10013/text?s=4&r=17	Foundation; relevance; FRE 403 (confuses the issues); FRE 404 improper character evidence
321	H.R. 8706 ("Dismantle DEI Act of 2024")	https://www.congress.gov/bill/118th-congress/house-bill/8706/cosponsors?s=9&r=103	Foundation; relevance; FRE 403 (confuses the issues); FRE 404 improper character evidence
322	H.R. 7725 ("Amending the Higher Education Act of 1965 to prohibit graduate medical schools from receiving federal financial assistance if such schools adopt certain policies and requirements relating to DEI")	https://www.congress.gov/bill/118th-congress/house-bill/7725/text?s=4&r=26	Foundation; relevance; FRE 403 (confuses the issues); FRE 404 improper character evidence

No	Description	References[1]	LD Objections[2]
323	S.B. 626 (S.L. 2023-71, "Modify Rioting Laws")	https://www.ncleg.gov/BillLookUp/2023/S626	Foundation; relevance; FRE 403 (confuses the issues and misleading as the full name of the legislation is "Modify Human Trafficking and Rioting Laws")
324	S.L. 2023-71	https://www.ncleg.gov/Sessions/2023/Bills/Senate/PDF/S626v5.pdf	Foundation; relevance; FRE 403 (confuses the issues as this bill is not challenged in this litigation)
325	S.B. 248 (S.L. 2023-37, Nash/Edgecombe School Boards) Bill History	https://www.ncleg.gov/BillLookUp/2023/s248	Foundation; relevance; FRE 403 (confuses the issues as this bill is not challenged in this litigation)
326	"A note from Bobby [Hanig]"	https://www.congress.gov/bill/118th-congress/house-bill/1228/cosponsors?s=4&r=231 *Counsel represented via email on 5/22/2025 that the correct link is: https://bobbyhanig.net/index.php/2023/04/29/a-note-from-bobby/*	Authentication; foundation; relevance

No	Description	References[1]	LD Objections[2]
327	H.R. 282 ("Expressing that compelled political litmus tests used by public institutions to require individuals to identify with specific ideological views are directly at odds with the principles of academic freedom and free speech and in violation of the First Amendment of the Constitution")	https://www.congress.gov/bill/118th-congress/house-resolution/282/text?s=4&r=47	Foundation; relevance; FRE 403 (confuses the issues); FRE 404 improper character evidence
328	S.B. 406 Filed Edition	https://www.ncleg.gov/Sessions/2023/Bills/Senate/PDF/S406v0.pdf	Foundation; relevance; FRE 403 (confuses the issues as this bill is not challenged in this litigation)
329	S.B. 356 (Photo ID Constitutional Amendment)	https://www.ncleg.gov/BillLookUp/2023/S356	Foundation; relevance; FRE 403 (confuses the issues as this bill is not challenged in this litigation)
330	S.B. 356 Filed Edition	https://www.ncleg.gov/Sessions/2023/Bills/Senate/PDF/S356v0.pdf	Foundation; relevance; FRE 403 (confuses the issues as this bill is not challenged in this litigation)
331	S.B. 352 ("Remove Foreign Citizens from Voting Rolls")	https://www.ncleg.gov/BillLookUp/2023/S352	Foundation; relevance; FRE 403 (confuses the issues as this bill is not challenged in this litigation)
332	S.B. 352 Filed Edition	https://www.ncleg.gov/Sessions/2023/Bills/Senate/PDF/S352v0.pdf	Foundation; relevance; FRE 403 (confuses the issues as this bill is not challenged in this litigation)

No	Description	References[1]	LD Objections[2]
333	H.R. 1229 ("Stop CRT Act")	https://www.congress.gov/bill/118th-congress/house-bill/1229/cosponsors?s=10&r=238	Foundation; relevance; FRE 403 (confuses the issues); FRE 404 improper character evidence
334	H.R. 1228 ("Combatting Racist Training in the Military Act of 2023")	https://www.congress.gov/bill/118th-congress/house-bill/1228/cosponsors?s=4&r=231	Foundation; relevance; FRE 403 (confuses the issues); FRE 404 improper character evidence
335	S.B. 88 ("Election Day Integrity Act") Bill History	https://www.ncleg.gov/BillLookup/2023/S88	Foundation; relevance; FRE 403 (confuses the issues as this bill is not challenged in this litigation)
336	S.B. 88 Filed Edition	https://www.ncleg.gov/Sessions/2023/Bills/Senate/PDF/S88v0.pdf	Foundation; relevance; FRE 403 (confuses the issues as this bill is not challenged in this litigation)
337	S.B. 50 ("Require Cooperation with ICE 2.0")	https://www.ncleg.gov/BillLookUp/2023/S50	Foundation; relevance; FRE 403 (confuses the issues as this bill is not challenged in this litigation)
338	S.B. 50 Filed Edition	https://www.ncleg.gov/Sessions/2023/Bills/Senate/PDF/S50v0.pdf	Foundation; relevance; FRE 403 (confuses the issues as this bill is not challenged in this litigation)
339	Ralph Hise for NC Senate (various comments about CRT)	Hise Dep. Ex. 50	Hearsay; relevance
340	Senator Ralph Hise Facebook posts criticizing CRT and Cheri Beasley	Hise Dep. Ex. 54	Hearsay; relevance

No	Description	References[1]	LD Objections[2]
341	North Carolina Legislative Black Caucus Priorities	https://www.nclegislativeblackcaucus.com/general-8-1	
342	North Carolina Legislative Black Caucus Members and Committees	https://www.nclegislativeblackcaucus.com/blank-2	
343	Public Laws, Session of 1901, chapt. 89.	https://ia800203.us.archive.org/10/items/publiclawsresolu1901nort/publiclawsresolu1901nort.pdf#page=0332	Foundation
344	"North Carolina African-American Legislators, 1969–2025," North Carolina General Assembly	https://sites.ncleg.gov/library/wp-content/uploads/sites/5/2023/03/African-Americans.pdf	
345	Photo ID Exception Form, North Carolina State Board of Elections	https://s3.amazonaws.com/dl.ncsbe.gov/State_Board_Meeting_Docs/2023-06-27/Photo%20ID%20Exception%20Forms/Draft%20Photo%20ID%20Exception%20Form%20In-Person%2020230623.pdf	Foundation; relevance
346	S.B. 824 (S.L. 2018-144, "Implementation of Voter ID Constitutional Amendment")	https://www.ncleg.gov/Sessions/2017/Bills/Senate/PDF/S824v7.pdf	Foundation; relevance; FRE 404 improper character evidence
347	S.B. 747 (S.L. 2023-140, "Elections Law Changes")	https://www.ncleg.gov/Sessions/2023/Bills/Senate/PDF/S747v6.pdf	Foundation; relevance; FRE 403 (confuses the issues as this bill is not challenged in this litigation)

No	Description	References[1]	LD Objections[2]
348	S.B. 749 (S.L. 2023-139, "No Partisan Advantage in Elections")	https://www.ncleg.gov/Sessions/2023/Bills/Senate/PDF/S749v7.pdf	Foundation; relevance; FRE 403 (confuses the issues as this bill is not challenged in this litigation)
349	S.B. 406 ("Choose Your School, Choose Your Future") Bill History	https://www.ncleg.gov/BillLookup/2023/S406	Foundation; relevance; FRE 403 (confuses the issues as this bill is not challenged in this litigation)
350	Addison McDowell for Congress, Issues - Secure Elections	https://www.mcdowellfornc.com/issues	Authentication; foundation; relevance; FRE 403 (confuses the issues); FRE 404 improper character evidence
351	Common Cause, "More than 1,600 North Carolinians attend #UniteNC Town Halls"	NAACPPS_0000070-74	Hearsay
352	Common Cause, "It's time to end gerrymandering for good in North Carolina"	NAACPPS_0000081-85 *NAACP Plaintiffs represented via email on 5/29/2025 that the beginning bates was intended to be NAACPPS_00000810 not 811 for completeness.*	Hearsay; relevance
353	Common Cause, "NC residents call for fair voting maps at the People's Lobby Day to End Gerrymandering"	NAACPPS_0000339-341	Hearsay; relevance

No	Description	References[1]	LD Objections[2]
354	Email from Bob Phillips, "We need your help to protect our elections in NC"	NAACPPS_0002129	Hearsay; relevance
355	Email from Bob Phillips, "Take Action: Ensure your county's elections are fully funded"	NAACPPS_0002096	Hearsay; relevance
356	Maxwell First Declaration	Doc. 63-6	Hearsay; relevance
357	Maxwell Second Declaration	Doc. 63-8	Hearsay; FRE 1002; FRE 1006; relevance; FRE 403 (confuses the issues)
358	Maxwell Third Declaration	Doc. 82-5	Hearsay; FRE 1002; FRE 1006; relevance; FRE 403 (confuses the issues)
359	Phillips First Declaration	Doc. 63-9	Hearsay; FRE 1002; FRE 1006
360	Phillips Second Declaration	Doc. 82-6	Hearsay; FRE 1002; FRE 1006; relevance; FRE 403 (confuses the issues)
361	Mitzi Reynolds Turner Standing Declaration		Hearsay#[5]
362	Dawn Daly-Mack Standing Declaration		Hearsay#

[5] Hearsay# = Objection will be withdrawn pursuant to agreement with counsel so long as declarant does not testify live at trial, as declarant is listed on *NAACP* Plaintiffs' "Will Call" list.

No	Description	References[1]	LD Objections[2]
363	Corine Mack Standing Declaration		Hearsay#
364	Calvin Jones Standing Declaration		Hearsay#
365	Linda Sutton Standing Declaration		Hearsay#
366	Syene Jasmin Standing Declaration		Hearsay#
367	Expert Report of Dr. Chris Clark		Hearsay*
368	Expert Reply Report of Dr. Chris Clark		Hearsay*
369	Supplemental Expert Report of Dr. Chris Clark		Hearsay*
370	Supplemental Rebuttal Expert Report of Dr. Chris Clark		Hearsay*
371	House Member Residences	LD0004476	
372	2023 Enacted House Map with Incumbent Residences	https://webservices.ncleg.gov/ViewDocSiteFile/81740	
373	Excerpts of Supplemental Report of Dr. Barber	Doc. 101-2	Rule of Completeness; FRE 403 (needlessly cumulative, wasting time)

No	Description	References[1]	LD Objections[2]
374	Summary Exhibit of SL 2023-146 (Enacted Senate) with BVAP	https://davesredistricting.org/maps#viewmap::1da0697a-e47f-47eb-8999-0811cbdd83ee	Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
375	Enacted Senate Maptitude Report		Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
376	Summary Exhibit of SL 2023-149 (Enacted House) with BVAP	https://davesredistricting.org/join/fed95015-f822-4370-a65c-0661277b494e	Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
377	Enacted House Maptitude Report		Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
378	Summary Exhibit of SL 2023-145 (Enacted Congress) with BVAP	https://davesredistricting.org/join/2bc90b70-4b87-47b4-a039-08f65ed49e7d	Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
379	Enacted Congress Maptitude Report		Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
380	Summary Exhibit of LD Map Production CCJ-1 with BVAP	https://davesredistricting.org/maps#viewmap::1eb64888-47a6-4d24-82e6-ec7af8db9a68	Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705

No	Description	References[1]	LD Objections[2]
381	CCJ-1 Maptitude Report		Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
382	CCJ-1 Metadata		Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
383	Summary Exhibit of LD Map Production SCJ-1 with BVAP	https://davesredistricting.org/join/2a60499a-ce96-4c3c-bc9e-ff81e387c794	Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
384	SCJ-1 Maptitude Report		Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
385	SCJ-1 Metadata		Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
386	Summary Exhibit of LD Map Production CBK-2 with BVAP	Hise Dep. Ex. 32; https://davesredistricting.org/maps#viewmap::f3215b69-f64b-43ad-8e4c-05c0707a9aa8	Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
387	CBK-2 Maptitude Report		Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705

No	Description	References[1]	LD Objections[2]
388	CBK-2 Metadata		Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
389	Summary Exhibit of LD Map Production CBA-2 with BVAP	Hise Dep. Ex. 34; https://davesredistricting.org/join/2de441e9-9eae-4eed-8416-89384b439d5b	Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
390	CBA-2 Maptitude Report		Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
391	CBA-2 Metadata		Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
392	Summary Exhibit of LD Map Production STU-1 with BVAP with Mecklenburg Zoom-In	Hise Dep. Ex. 46 (zoomed in on Mecklenburg); https://davesredistricting.org/join/87d2f8b8-1c5a-4bf2-9e9d-66a43815ab6f	Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
393	STU-1 Maptitude Report		Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
394	STU-1 Metadata		Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705

No	Description	References[1]	LD Objections[2]
395	Summary Exhibit of LD Map Production guilford v2 with BVAP	https://davesredistricting.org/maps#viewmap::9e749362-dc45-4acd-82e8-9c3c2c330f6b	Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
396	Guilford v2 Maptitude Report		Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
397	Guilford v2 Metadata		Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
398	Summary Exhibit of LD Map Production HDs 005 baf with BVAP	https://davesredistricting.org/maps#viewmap::06cd3adf-a141-4ede-abac-a0bfdf1b40b1	Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
399	HDs 005 baf Maptitude Report		Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
400	HDs 005 baf Metadata		Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
401	Summary Exhibit of LD Map Production $R85PEKP with BVAP	Springhetti Dep. Ex. 13; https://davesredistricting.org/maps#viewmap::a09d2994-79bc-4ffb-97d6-1b935b705482	Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705

No	Description	References[1]	LD Objections[2]
402	$R85PEKP Maptitude Report		Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
403	$R85PEKP Metadata		Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
404	Summary Exhibit of LD Map Production Meck v2 with BVAP	https://davesredistricting.org/maps#viewmap::c84932d9-c6b1-4ecd-9047-f11f48b1516d	Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
405	Meck v2 Maptitude Data		Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
406	Meck v2 Metadata		Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
407	Summary Exhibit of LD Map Production CCL-1 with BVAP	https://davesredistricting.org/maps#viewmap::838128b5-e05c-4feb-8383-c444e8373e73	Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
408	CCL-1 Maptitude Report		Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705

No	Description	References[1]	LD Objections[2]
409	CCL-1 Metadata		Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
410	Summary Exhibit of LD Map Production CST-3 with BVAP	https://davesredistricting.org/maps#viewmap::694ae75d-b057-4079-a85e-b9d03e155bb3	Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
411	CST-3 Maptitude Report		Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
412	CST-3 Metadata		Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
413	Summary Exhibit of LD Map Production CBP-5 with BVAP	https://davesredistricting.org/join/06efc22e-3af5-4fd9-9214-b8c12d9c903e	Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
414	CBP-5 Maptitude Report		Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
415	CBP-5 Metadata		Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705

No	Description	References[1]	LD Objections[2]
416	Summary Exhibit of LD Map Production SST-3 with BVAP	https://davesredistricting.org/join/9b419470-a384-4590-9abd-71648796d4db	Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
417	SST-3 Maptitude Report		Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
418	SST-3 Metadata		Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
419	Summary Exhibit of LD Map Production CCH-4 with BVAP	https://davesredistricting.org/join/ef5cee4a-6adc-49df-9ecf-a1c75effbcd0	Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
420	CCH-4 Maptitude Report		Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
421	CCH-4 Metadata		Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
422	Summary Exhibit of LD Map Production SCC-1 with BVAP and Mecklenburg Zoom-In	https://davesredistricting.org/join/b57939fe-49b9-4b3f-8c9d-20334ddab2eb	Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705

No	Description	References[1]	LD Objections[2]
423	SCC-1 Maptitude Report		Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
424	SCC-1 Metadata		Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
425	Summary Exhibit of LD Map Production CMT-2 with BVAP	https://davesredistricting.org/join/714cfd1d-bb9b-41d2-936e-d2e69688d225	Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
426	CMT-2 Maptitude Report		Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
427	CMT-2 Metadata		Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
428	Summary Exhibit of LD Map Production CMT-1 with BVAP	https://davesredistricting.org/join/49f7ccf0-16ad-4e82-bcb9-29b08cc958d6	Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
429	CMT-1 Maptitude Report		Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705

No	Description	References[1]	LD Objections[2]
430	CMT-1 Metadata		Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
431	Summary Exhibit of LD Map Production CBP-1 with BVAP	https://davesredistricting.org/join/37447356-2079-4756-abfe-6f2b70548bd8	Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
432	CBP-1 Maptitude Report		Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
433	CBP-1 Metadata		Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
434	Summary Exhibit of HST-2 with BVAP	https://davesredistricting.org/join/d670f883-1e49-4190-8f85-391171690b2f	Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
435	HST-2 Maptitude Report		Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
436	Summary Exhibit of S.L. 2022-2 (Senate) with BVAP	https://davesredistricting.org/join/7bca39af-d283-4df4-8739-20b39b242393	Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705

No	Description	References[1]	LD Objections[2]
437	Maptitude Report for S.L. 2022-2 (Senate)		Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
438	Summary Exhibit of SL 2022-3 (Congress) with BVAP	https://davesredistricting.org/join/02924323-2760-4ec4-9bc2-ded7ed6ed324	Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
439	Maptitude Report for S.L. 2022-3 (Congress)		Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
440	Summary Exhibit of S.L. 2022-4 (Enacted House) with BVAP	https://davesredistricting.org/join/6f1cd8e9-bd3e-4be9-97e9-6625509dabee	Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
441	Maptitude Report for S.L. 2022-4 (House)		Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
442	Summary Exhibit of S.L. 2021-175 (Enacted House) with BVAP	https://davesredistricting.org/join/8ae16f76-0716-4392-bc64-abf00251cb48	Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
443	Maptitude Report for S.L. 2021-175		Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705

No	Description	References[1]	LD Objections[2]
444	Summary Exhibit of S.L. 2023-146, District 42, with Partisanship	https://davesredistricting.org/join/1c5f9f43-259a-4360-ae3d-b70cb045b05a	Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
445	Summary Exhibit of S.L. 2023-146, District 8, with Partisanship	https://davesredistricting.org/join/1c5f9f43-259a-4360-ae3d-b70cb045b05a	Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
446	Summary Exhibit of S.L. 2023-149, District 35, with Partisanship	https://davesredistricting.org/join/1c5f9f43-259a-4360-ae3d-b70cb045b05a	Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
447	Summary Exhibit of S.L. 2023-149, District 91, with Partisanship	https://davesredistricting.org/join/1c5f9f43-259a-4360-ae3d-b70cb045b05a	Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
448	Summary Exhibit of 2022 Interim (Congress) with BVAP	https://davesredistricting.org/join/14b0441f-ec66-4ff9-a6ad-2b7c8b2a5ca5	Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
449	Maptitude Report for 2022 Interim (Congress)		Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
450	Summary Exhibit of S.L. 2021-173 (Senate) with BVAP	https://davesredistricting.org/join/2d8f15e6-6cb5-425c-b9a8-794aecfd998f	Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705

No	Description	References[1]	LD Objections[2]
451	Maptitude Report for S.L. 2021-173 (Senate)		Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
452	Summary Exhibit of S.L. 2021-174 (Congress) with BVAP	https://davesredistricting.org/join/d1959996-4ed4-49b2-8967-1c184ebd333c	Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
453	Maptitude Report for S.L. 2021-174(Congress)		Authentication; foundation; Fed. R. Civ. P. 26(a)(2) improper/ undisclosed expert testimony; FRE 701-703, and 705
454	Maptitude Report for S.L. 2021-175 (Enacted House)	https://davesredistricting.org/join/8ae16f76-0716-4392-bc64-abf00251cb48 *NAACP Plaintiffs represented via email on 5/29/2025 that this exhibit is withdrawn as a duplicate of NAACPPX 443*	N/a
455	SL 2023-146 Data file	https://www.ncleg.gov/redistricting *NAACP Plaintiffs represented via email on 5/22/2025 that the correct link is https://www.ncleg.gov/Files/GIS/Plans_Main/Senate_2023/SL%202023-146%20Senate%20-%20Block%20Assignment%20File.zip*	

No	Description	References[1]	LD Objections[2]
456	SL 2023-149 Data file	https://www.ncleg.gov/redistricting *NAACP Plaintiffs represented via email on 5/22/2025 that the correct link is https://www.ncleg.gov/Files/GIS/Plans_Main/House_2023/SL%202023-149%20House%20-%20Block%20Assignment%20File.zip*	
457	SL 2023-145 Data file	https://www.ncleg.gov/redistricting *NAACP Plaintiffs represented via email on 5/22/2025 that the correct link is https://www.ncleg.gov/Files/GIS/Plans_Main/Congress_2023/SL%202023-145%20Congress%20-%20Block%20Assignment%20File.zip*	
458	CBK-2 Data file	Produced by Legislative Defendants on July 26, 2024 *NAACP Plaintiffs represented via email on 5/22/2025 that this refers to LD_MAP_001092-93*	
459	CBA-2 Data file	Produced by Legislative Defendants on July 26, 2024 *NAACP Plaintiffs represented via email on 5/22/2025 that this refers to LD_MAP_0010923-24* *NAACP Plaintiffs represented via email on 5/29/2025 that this exhibit is withdrawn as a duplicate of NAACPPX 149.*	N/a
460	STU-1 Data file	Produced by Legislative Defendants on July 26, 2024 *NAACP Plaintiffs represented via email on 5/22/2025 that this refers to LD_MAP_000683-84*	

No	Description	References[1]	LD Objections[2]
461	guilford v2 Data file	Produced by Legislative Defendants on July 26, 2024 *NAACP Plaintiffs represented via email on 5/22/2025 that this refers to LD_MAP_002610 (Blake Springhetti Backup)*	Relevance; FRE 403 (confuses the issues)
462	HDs 005 baf Data file	Produced by Legislative Defendants on July 26, 2024 *NAACP Plaintiffs represented via email on 5/22/2025 that this refers to LD_MAP_002610 (Blake Springhetti Backup)*	Relevance; FRE 403 (confuses the issues)
463	$R85PEKP Data file	Produced by Legislative Defendants on July 26, 2024 *NAACP Plaintiffs represented via email on 5/22/2025 that this refers to LD_MAP_002610 (Blake Springhetti Backup)*	Relevance; FRE 403 (confuses the issues)
464	Meck v2 Data file	Produced by Legislative Defendants on July 26, 2024 *NAACP Plaintiffs represented via email on 5/22/2025 that this refers to LD_MAP_002610 (Blake Springhetti Backup)*	Relevance; FRE 403 (confuses the issues)
465	CCL-1 Data file	Produced by Legislative Defendants on July 26, 2024 *NAACP Plaintiffs represented via email on 5/22/2025 that this refers to LD_MAP_001986-87*	
466	CST-3 Data file	Produced by Legislative Defendants on July 26, 2024 *NAACP Plaintiffs represented via email on 5/22/2025 that this refers to LD_MAP_002501-02*	
467	SST-3 Data file	Produced by Legislative Defendants on July 26, 2024 *NAACP Plaintiffs represented via email on 5/22/2025 that this refers to LD_MAP_000444-445*	

No	Description	References[1]	LD Objections[2]
468	CCH-4 Data file	Produced by Legislative Defendants on July 26, 2024 *NAACP Plaintiffs represented via email on 5/22/2025 that this refers to LD_MAP_001615-16*	
469	SCC-1 Data file	Produced by Legislative Defendants on July 26, 2024 *NAACP Plaintiffs represented via email on 5/22/2025 that this refers to LD_MAP_000002-03*	
470	CMT-2 Data file	Produced by Legislative Defendants on July 26, 2024 *NAACP Plaintiffs represented via email on 5/22/2025 that this refers to LD_MAP_002335-36*	
471	CMT-1 Data file	Produced by Legislative Defendants on July 26, 2024 *NAACP Plaintiffs represented via email on 5/22/2025 that this refers to LD_MAP_002172-73*	
472	SL 2022-2 Data file	https://www.ncleg.gov/redistricting *NAACP Plaintiffs represented via email on 5/22/2025 that the correct link is https://www.ncleg.gov/Files/GIS/Plans_Main/Senate_2022/SL%202022-2%20Senate%20-%20Block%20Assignment%20File.zip*	
473	SL 2022-3 Data file	https://www.ncleg.gov/redistricting *NAACP Plaintiffs represented via email on 5/22/2025 that the correct link is "): https://www.ncleg.gov/Files/GIS/Plans_Main/Congress_2022/SL%202022-3%20Congress%20-%20Block%20Assignment%20File.zip*	

No	Description	References[1]	LD Objections[2]
474	SL 2022-4 Data file	https://www.ncleg.gov/redistricting *NAACP Plaintiffs represented via email on 5/22/2025 that the correct link is https://www.ncleg.gov/Files/GIS/Plans_Main/House_2022/SL%202022-4%20House%20-%20Block%20Assignment%20File.zip*	
475	SL 2021-175 Data file	https://www.ncleg.gov/redistricting *NAACP Plaintiffs represented via email on 5/22/2025 that the correct link is https://www.ncleg.gov/Files/GIS/Plans_Main/House_2021/SL%202021-175%20House%20-%20Block%20Assignment%20File.zip*	
476	2022 Interim Data file	https://www.ncleg.gov/redistricting *NAACP Plaintiffs represented via email on 5/22/2025 that the correct link is https://www.ncleg.gov/Files/GIS/Plans_Main/Congress_2022_Court/2022%20Interim%20Congressional%20-%20Block%20Assignment%20File.zip*	

No	Description	References[1]	LD Objections[2]
477	29210173 Data file	https://www.ncleg.gov/redistricting *NAACP Plaintiffs represented via email on 5/22/2025 that the correct link is https://www.ncleg.gov/Files/GIS/Plans_Main/Senate_2021/SL%202021-173%20Senate%20-%20Block%20Assignment%20File.zip* *NAACP Plaintiffs represented via email on 5/29/2025 that the correct title for this exhibit is "2021-173 Data file"*	
478	2021-174 Data file	https://www.ncleg.gov/redistricting *NAACP Plaintiffs represented via email on 5/22/2025 that the correct link is https://www.ncleg.gov/Files/GIS/Plans_Main/Congress_2021/SL%202021-174%20Congress%20-%20Block%20Assignment%20File.zip*	
479	"Drawing Effective Minority Districts: A Conceptual Framework and Some Empirical Evidence" by Dr. Lisa Handley (Alford)	Alford Supp. Dep. Ex. 4	

No	Description	References[1]	LD Objections[2]
480	American National Election Studies. 2022. ANES Time Series Cumulative Data File [dataset and documentation]. September 16, 2022, version.	Dr. LaFleur Stephens-Dougan Expert Report August 1, 2024; www.electionstudies.org.	Hearsay, relevance, foundation
481	Kinder, D.R. and Sanders, L.M., 1996. Divided by color: Racial Politics and Democratic ideals. University of Chicago Press.	Dr. LaFleur Stephens-Dougan Expert Report August 1, 2024 *NAACP Plaintiffs represented via email on 5/28/2025 that this exhibit is withdrawn.*	N/a
482	American National Election Study Time Series Cumulative Data File (1948 – 2020)	Dr. LaFleur Stephens-Dougan Expert Report August 1, 2024 https://electionstudies.org	Hearsay, relevance, foundation)
483	Results of SurveyUSA News Poll #26353: North Carolina (Release Date 06/13/2022),	Dr. LaFleur Stephens-Dougan Expert Report August 1, 2024; https://www.surveyusa.com/client/PollReport.aspx?g=b97634eb-25f9-47b3-92b4-e5f3999baceb (last accessed July 29, 2024).	Hearsay, relevance, foundation

No	Description	References[1]	LD Objections[2]
484	Bullock III, C.S. and Rozell, M. eds., 2022. The new politics of the old South: An introduction to Southern politics. Rowman & Littlefield.	Dr. LaFleur Stephens-Dougan Expert Report August 1, 2024 *NAACP Plaintiffs represented via email on 5/28/2025 that this exhibit is withdrawn.*	N/a
485	Results of Elon University Poll, "Views on Gubernatorial and Presidential Candidates, Sports Betting, and Abortion" (June 5-7, 2023)	Dr. LaFleur Stephens-Dougan Expert Report August 1, 2024; https://eloncdn.blob.core.windows.net/eu3/sites/819/2023/06/Elon-Poll-Report- 061423.pdf (last accessed Oct. 29, 2024). *NAACP Plaintiffs provided a corrected link on 5/29/2025 at https://eloncdn.blob.core.windows.net/eu3/sites/819/2023/06/Elon-Poll-Report-061423.pdf (last accessed May 29, 2025).*	Hearsay, relevance, foundation
486	Results of Elon University Poll, "Views of Confederate Monuments in North Carolina" (March 30 – Apr. 2, 2021)	Dr. LaFleur Stephens-Dougan Expert Report August 1, 2024; https://eloncdn.blob.core.windows.net/eu3/sites/819/2021/04/Elon-Poll-Report-040821.pdf (last accessed Aug. 1, 2024).	Hearsay, relevance, foundation

No	Description	References[1]	LD Objections[2]
487	Danielle Battaglia. "Crime and racial justice rulings highlight Beasley's record as an NC judge." The Charlotte Observer. October 16, 2022	Dr. LaFleur Stephens-Dougan Expert Reply Report Oct. 17, 2024; https://www.charlotteobserver.com/news/politics-government/election/article267016156.html *NAACP Plaintiffs represented via email on 5/29/2025 that this exhibit is withdrawn.*	N/a
488	Danielle Battaglia. "NC TV stations pull ad attacking Senate candidate Beasley over its 'false statements'." Raleigh News & Observer. October 25, 2022	Dr. LaFleur Stephens-Dougan Expert Reply Report Oct. 17, 2024; https://www.newsobserver.com/news/politics-government/election/article262127492.html *NAACP Plaintiffs represented via email on 5/29/2025 that this exhibit is withdrawn.*	N/a
489	NRSC IE. NC: Vulnerable. June 8, 2022	Dr. LaFleur Stephens-Dougan Expert Reply Report Oct. 17, 2024; https://www.youtube.com/watch?v=tb_62Zbr75s (commonly referred to as the "Failed Our Children" ad).	Hearsay, relevance, foundation
490	Club for Growth. "We Won't Know" CFG Action Ad (NC-SEN). Sept. 29, 2022	Dr. LaFleur Stephens-Dougan Expert Reply Report Oct. 17, 2024; https://www.youtube.com/watch?v=y6xYrhbtGQ4.	Hearsay, relevance, foundation

No	Description	References[1]	LD Objections[2]
491	Wright, Will. "Group targets Beasley with TV ad about sex offender case." The Charlotte Observer. October 3, 2022,	Dr. LaFleur Stephens-Dougan Expert Reply Report Oct. 17, 2024; https://www.charlotteobserver.com/news/politics-government/election/article266573436.html. *NAACP Plaintiffs represented via email on 5/29/2025 that this exhibit is withdrawn.*	N/a
492	Results of Elon University Poll, Survey of North Carolina Registered Voters August 2-9, 2024, Elon University Poll (Aug. 27, 2024)	Dr. LaFleur Stephens-Dougan Expert Supplemental Report Mar. 17, 2025; https://eloncdn.blob.core.windows.net/eu3/sites/819/2024/08/ElonPoll_8_27_24_toplinet abs.pdf *NAACP Plaintiffs provided the correct link on 5/29/2025 at https://eloncdn.blob.core.windows.net/eu3/sites/819/2024/08/Elon-Poll-Report-082724.pdf (last accessed May 29, 2025).*	
493	Results of Elon University Poll, Survey of North Carolina Registered Voters September 4-13, 2024, Elon University Poll (Sept. 24, 2024)	Dr. LaFleur Stephens-Dougan Expert Supplemental Report Mar. 17, 2025; https://eloncdn.blob.core.windows.net/eu3/sites/819/2024/09/Elon-Poll-Report-092424.pdf	
494	Results of Elon University Poll, Survey of North Carolina Registered Voters Oct. 10-17, 2024, Elon University Poll (Oct. 29, 2024),	Dr. LaFleur Stephens-Dougan Expert Supplemental Report Mar. 17, 2025 *NAACP Plaintiffs represented via email on 5/28/2025 that the appropriate link for Exhibit 494 is https://eloncdn.blob.core.windows.net/eu3/sites/819/2024/10/ElonPoll_Report_102924.pdf*	

No	Description	References[1]	LD Objections[2]
495	Senate Bills Passed by the Senate, 2025-2026 Session, North Carolina General Assembly, https://www.ncleg.gov/Legislation/Bills/ChamberBillsPassedByChamber/2025/S/S/.	Dr. LaFleur Stephens-Dougan Expert Supplemental Report Mar. 17, 2025 *NAACP Plaintiffs represented via email on 5/28/2025 that link for Exhibit 494 was inadvertently included with Exhibit 495.*	Hearsay, relevance, foundation, FRE 404 improper character evidence
496	Senate Roll Call Vote Transcript for Roll Call #35, 2025-2026 Session, North Carolina General Assembly,	Dr. LaFleur Stephens-Dougan Expert Supplemental Report Mar. 17, 2025; https://www.ncleg.gov/Legislation/Votes/RollCallVoteTranscript/2025/S/35.	Hearsay, relevance, foundation, FRE 404 improper character evidence
497	Report of the Committee on the Judiciary on S. 1992 (Voting Rights Act Extension), United States Senate, 97th Congress, 2nd Session, Report No. 97-417 [Senate Factor Report,], pp. 28-9	Aug. 1, 2024 Bagley Corrected Expert Report *NAACP Plaintiffs represented via email on 5/28/2025 that they intend to introduce "specific pages of the Senate Factor Report (pp. 28-29, 31-33), and will provide a copy of those pages to Legislative Defendants this week"*	

No	Description	References[1]	LD Objections[2]
498	Eric Foner, Reconstruction: America's Unfinished Revolution, 1863-1877 (New York: Harper and Row, 1988), pp. 199-213.	Aug. 1, 2024 Bagley Corrected Expert Report *NAACP Plaintiffs represented via email on 5/28/2025 that this exhibit is withdrawn.*	N/a
499	Milton Ready, The Tar Heel State: A History of North Carolina (Columbia: University of South Carolina Press, 2005), pp. 248-65	Aug. 1, 2024 Bagley Corrected Expert Report *NAACP Plaintiffs represented via email on 5/28/2025 that this exhibit is withdrawn.*	N/a
500	J. Morgan Kousser, The Shaping of Southern Politics: Suffrage Restriction and the Establishment of the One-Party South, 1880-1910 (New Haven: Yale University Press, 1974), pp. 260	Aug. 1, 2024 Bagley Corrected Expert Report *NAACP Plaintiffs represented via email on 5/28/2025 that this exhibit is withdrawn.*	N/a
501	Keech and Sistrom, "North Carolina," Quiet Revolution in the South, p. 157	Aug. 1, 2024 Bagley Corrected Expert Report *NAACP Plaintiffs represented via email on 5/28/2025 that this exhibit is withdrawn.*	N/a

No	Description	References[1]	LD Objections[2]
502	Kousser, The Shaping of Southern Politics, pp. 183-92	Aug. 1, 2024 Bagley Corrected Expert Report *NAACP Plaintiffs represented via email on 5/28/2025 that this exhibit is withdrawn.*	N/a
503	James Leloudis and Robert Korstad, Fragile Democracy: The Struggle over Race and Voting Rights in North Carolina (Chapel Hill: University of North Carolina Press, 2020), pp. 10-13	Aug. 1, 2024 Bagley Corrected Expert Report *NAACP Plaintiffs represented via email on 5/28/2025 that this exhibit is withdrawn.*	N/a
504	Robert Rogers Korstad, Civil Rights Unionism: Tobacco Workers and the Struggle for Democracy in the Mid-Twentieth Century South (Chapel Hill: University of North Carolina Press, 2003), pp. 382-86	Aug. 1, 2024 Bagley Corrected Expert Report *NAACP Plaintiffs represented via email on 5/28/2025 that this exhibit is withdrawn.*	N/a

No	Description	References[1]	LD Objections[2]
505	Milton C. Jordan, "Black Legislators: From Political Novelty to Political Force," North Carolina Insight, Dec. 1989, pp. 40-58, at p. 51	Aug. 1, 2024 Bagley Corrected Expert Report *NAACP Plaintiffs represented via email on 5/28/2025 that this exhibit is withdrawn.*	N/a
506	Anita Earls et al., "Voting Rights in North Carolina, 1982 – 2006," 17 Southern California Review of Law and Social Justice: (2007-2008), pp. 577-642, at pp. 586-88	Aug. 1, 2024 Bagley Corrected Expert Report *NAACP Plaintiffs represented via email on 5/28/2025 that this exhibit is withdrawn.*	N/a

No	Description	References[1]	LD Objections[2]
507	Wm. Bradford Reynolds, Assistant Attorney General for Civil Rights, to Mr. Raymond Sykes, Chairman, Halifax County Board of Elections, May 16, 1984, U.S. Justice Department, Civil Rights Division, Section 5 Objection Letters by State [hereinafter "CRD Section 5 Objection Letters by State"	Aug. 1, 2024 Bagley Corrected Expert Report	Hearsay, relevance, foundation
508	CRD Section 5 Objection Letters by State, North Carolina, 1980s, passim	Aug. 1, 2024 Bagley Corrected Expert Report; https://www.justice.gov/crt/voting-determination-letters-north-carolina; Leloudis and Korstad, Fragile Democracy, pp. 82-83 *NAACP Plaintiffs represented via email on 5/28/2025 that this exhibit is withdrawn.*	N/a

No	Description	References[1]	LD Objections[2]
509	James P. Turner, Assistant Attorney General, to M.H. Hood Ellis, Wilson & Ellis, March 10, 1986, CRD Section 5 Objection Letters by State	Aug. 1, 2024 Bagley Corrected Expert Report	Hearsay, relevance, foundation
510	Wm. Bradford Reynolds, Assistant Attorney General for Civil Rights, to Alex K. Brock, Executive Secretary-Director, State Board of Education, Dec. 7, 1981, CRD Section 5 Objection Letters by State	Aug. 1, 2024 Bagley Corrected Expert Report	Hearsay, relevance, foundation
511	J. Morgan Kousser, Colorblind Injustice: Minority Voting Rights and the Undoing of the Second Reconstruction (Chapel Hill: University of North Carolina Press, 1999), pp. 251-52	Aug. 1, 2024 Bagley Corrected Expert Report *NAACP Plaintiffs represented via email on 5/28/2025 that this exhibit is withdrawn.*	N/a

No	Description	References[1]	LD Objections[2]
512	William Link, Righteous Warrior: Jesse Helms and the Rise of Modern Conservatism (New York: St. Martin's Press. 2008), pp. 379-80	Aug. 1, 2024 Bagley Corrected Expert Report *NAACP Plaintiffs represented via email on 5/28/2025 that this exhibit is withdrawn.*	N/a
513	Merle Black and Earl Black, The Rise of Southern Republicans (New York: Belknap, Harvard, 2002), pp. 103, 108	Aug. 1, 2024 Bagley Corrected Expert Report *NAACP Plaintiffs represented via email on 5/28/2025 that this exhibit is withdrawn.*	N/a
514	Patrick J. Sellers, et al., "Congressional Redistricting in North Carolina," in Bernard Grofman, Ed, Race and Redistricting in the 1990s (New York: Agathon Press, 1998), pp. 269-89, at pp. 270-78	Aug. 1, 2024 Bagley Corrected Expert Report *NAACP Plaintiffs represented via email on 5/28/2025 that this exhibit is withdrawn.*	N/a

No	Description	References[1]	LD Objections[2]
515	Rob Christensen and Jack D. Fleer, "North Carolina: Between Helms and Hunt No Majority Emerges," in Alexander Lamis, Ed., Southern Politics in the 1990s (Baton Rouge: Louisiana State University Press, 1999), pp. 81-106, at pp. 94-95	Aug. 1, 2024 Bagley Corrected Expert Report *NAACP Plaintiffs represented via email on 5/28/2025 that this exhibit is withdrawn.*	N/a
516	"Election of Blacks to Congress makes N.C. history," Durham Herald-Sun, Nov. 4, 1992	Aug. 1, 2024 Bagley Corrected Expert Report *NAACP Plaintiffs represented via email on 5/28/2025 that this exhibit is withdrawn.*	N/a
517	Jim Morrell, "Myrick wins big in the 9th," The Charlotte Observer, Nov. 9, 1994	Aug. 1, 2024 Bagley Corrected Expert Report *NAACP Plaintiffs represented via email on 5/28/2025 that this exhibit is withdrawn.*	N/a
518	Rob Christensen, "Republicans post gains in N.C. delegation," Raleigh News and Observer, Nov. 9, 1994	Aug. 1, 2024 Bagley Corrected Expert Report *NAACP Plaintiffs represented via email on 5/28/2025 that this exhibit is withdrawn.*	N/a

No	Description	References[1]	LD Objections[2]
519	Glenn Feldman, Ed., Painting Dixie Red: When, Where, Why, and How the South Became Republican (Gainesville: University Press of Florida, 2011), pp. 2-16	Aug. 1, 2024 Bagley Corrected Expert Report *NAACP Plaintiffs represented via email on 5/28/2025 that this exhibit is withdrawn.*	N/a
520	Joseph Crespino, Strom Thurmond's America (New York: Hill and Wang, 2012)	Aug. 1, 2024 Bagley Corrected Expert Report *NAACP Plaintiffs represented via email on 5/28/2025 that this exhibit is withdrawn.*	N/a
521	Robert R. Korstad and James Leloudis, To Right These Wrongs The North Carolina Fund and the Battle to End Poverty and Inequality in 1960s America (Chapel Hill: University of North Carolina Press, 2011), p. 302	Aug. 1, 2024 Bagley Corrected Expert Report *NAACP Plaintiffs represented via email on 5/28/2025 that this exhibit is withdrawn.*	N/a

No	Description	References[1]	LD Objections[2]
522	Joseph E. Lowndes, From the New Deal to the New Right: Race and the Southern Origins of Modern Conservatism (New Haven: Yale University Press, 2009)	Aug. 1, 2024 Bagley Corrected Expert Report *NAACP Plaintiffs represented via email on 5/28/2025 that this exhibit is withdrawn.*	N/a
523	Crespino, Strom Thurmond's America; Joseph Crespino, In Search of Another Country: Mississippi and the Conservative Counterrevolution (Princeton: Princeton University Press, 2009)	Aug. 1, 2024 Bagley Corrected Expert Report *NAACP Plaintiffs represented via email on 5/28/2025 that this exhibit is withdrawn.*	N/a
524	Kevin M. Kruse, White Flight: Atlanta and the Making of Modern Conservatism (Princeton: Princeton University Press, 2005)	Aug. 1, 2024 Bagley Corrected Expert Report *NAACP Plaintiffs represented via email on 5/28/2025 that this exhibit is withdrawn.*	N/a

No	Description	References[1]	LD Objections[2]
525	Glenn Feldman, The Great Melding: War, the Dixiecrat Rebellion, and the Southern Model for America's New Conservatism (Tuscaloosa: University of Alabama Press, 2014)	Aug. 1, 2024 Bagley Corrected Expert Report *NAACP Plaintiffs represented via email on 5/28/2025 that this exhibit is withdrawn.*	N/a
526	Kari Frederickson, The Dixiecrat Revolt and the End of the Solid South, 1932–1968 (Chapel Hill: University of North Carolina Press, 2001)	Aug. 1, 2024 Bagley Corrected Expert Report *NAACP Plaintiffs represented via email on 5/28/2025 that this exhibit is withdrawn.*	N/a
527	Thomas Sugrue, Sweet Land of Liberty: The Forgotten Struggle for Civil Rights in the North (New York: Random House, 2008)	Aug. 1, 2024 Bagley Corrected Expert Report *NAACP Plaintiffs represented via email on 5/28/2025 that this exhibit is withdrawn.*	N/a

No	Description	References[1]	LD Objections[2]
528	Thomas Sugrue, The Origins of the Urban Crisis: Race and Inequality in Postwar Detroit(Princeton: Princeton University Press, 2010)	Aug. 1, 2024 Bagley Corrected Expert Report *NAACP Plaintiffs represented via email on 5/28/2025 that this exhibit is withdrawn.*	N/a
529	Michelle Nickerson and Darren Dochuk, eds., Sunbelt Rising: The Politics of Space, Place, and Region (Philadelphia: University of Pennsylvania Press, 2011)	Aug. 1, 2024 Bagley Corrected Expert Report *NAACP Plaintiffs represented via email on 5/28/2025 that this exhibit is withdrawn.*	N/a
530	Joseph Bagley, The Politics of White Rights: Race, Justice, and Integrating Alabama's Schools (Athens: University of Georgia Press, 2018)	Aug. 1, 2024 Bagley Corrected Expert Report *NAACP Plaintiffs represented via email on 5/28/2025 that this exhibit is withdrawn.*	N/a

No	Description	References[1]	LD Objections[2]
531	George A. Chidi, "Black candidates campaign to rally minority vote," Rocky Mount Telegram, Oct. 24, 2004	Aug. 1, 2024 Bagley Corrected Expert Report *NAACP Plaintiffs represented via email on 5/29/2025 that this exhibit is withdrawn.*	N/a
532	Brenda Sullivan, "Even at the Turning of the Tide: An Analysis of the North Carolina Legislative Black Caucus." Journal of Black Studies 30, no. 6 (2000): 815-38, at 835-36	Aug. 1, 2024 Bagley Corrected Expert Report *NAACP Plaintiffs represented via email on 5/28/2025 that this exhibit is withdrawn.*	N/a
533	Charles Bullock III and Ronald Keith Gaddie, The Triumph of the Voting Rights Act in the South (Norman: University of Oklahoma Press, 2009), pp. 200-203	Oct. 4, 2024 Bagley Expert Reply *NAACP Plaintiffs represented via email on 5/28/2025 that this exhibit is withdrawn.*	N/a

No	Description	References[1]	LD Objections[2]
534	J. Michael Wiggins, Acting Assistant Attorney General, to Dwight W. Snow and Duncan B. McCormick, July 23, 2002, CRD Section 5 Objection Letters Online	Aug. 1, 2024 Bagley Corrected Expert Report	Hearsay, relevance, foundation
535	Wan J. Kim, Assistant Attorney General, to Michael Crowell, June 25, 2007, CRD Section 5 Objection Letters Online	Aug. 1, 2024 Bagley Corrected Expert Report	Hearsay, relevance, foundation
536	Wm. Bradford Reynolds, Assistant Attorney General, Civil Rights Division, to Robert C. Cogswell Jr., Apr. 29, 1985; CRD Section 5 Objection Letters Online	Aug. 1, 2024 Bagley Corrected Expert Report	Hearsay, relevance, foundation

No	Description	References[1]	LD Objections[2]
537	Wm. Bradford Reynolds, Assistant Attorney General, Civil Rights Division, to Robert C. Cogswell Jr., Mar. 3, 1986	Aug. 1, 2024 Bagley Corrected Expert Report *NAACP Plaintiffs represented via email on 5/28/2025 that this document is publicly available at https://www.justice.gov/sites/default/files/crt/legacy/2014/05/30/NC-1275.pdf*	Hearsay, relevance, foundation
538	Myron B. Pitts, "Fayetteville's City Council Structure Was Challenged in 2007, Dynamics Changed," Fayetteville Observer, Apr. 12, 2021	Aug. 1, 2024 Bagley Corrected Expert Report *NAACP Plaintiffs represented via email on 5/28/2025 that this exhibit is withdrawn.*	N/a
539	Staff Writer, "Inside Politics: Voorhees issues apology over redistricting email," Fayetteville Observer, July 8, 2013	Aug. 1, 2024 Bagley Corrected Expert Report; https://www.fayobserver.com/story/news/military/2013/07/08/inside-politics-voorhees-issues-apology/22114103007 *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a

No	Description	References[1]	LD Objections[2]
540	Paul Woolverton, "Vote Yes referendum back on Fayetteville ballots after NC Appeals Court order," Fayetteville Observer, Sept. 9, 2022	Aug. 1, 2024 Bagley Corrected Expert Report; https://www.fayobserver.com/story/news/2022/09/09/nc-appeals-court-revives-vote-yes-referendum-alter-fayetteville-city-council/8033343001/ *NAACP Plaintiffs represented via email on 5/29/2025 that this exhibit is withdrawn.*	N/a
541	Thomas E. Perez, Assistant Attorney General, to Robert E, Sonnenberg, Apr. 30, 2012, CRD Section 5 Objection Letters Online	Aug. 1, 2024 Bagley Corrected Expert Report	Hearsay, relevance, foundation
542	William Wan, "Inside the Republican creation of the North Carolina voting bill dubbed the 'monster' law," Washington Post, Sept. 2, 2016	Aug. 1, 2024 Bagley Corrected Expert Report; https://www.washingtonpost.com/politics/courts_law/inside-the-republican-creation-of-the-north-carolina-voting-bill-dubbed-the-monster-law/2016/09/01/79162398-6adf-11e6-8225-fbb8a6fc65bc_story.html *NAACP Plaintiffs represented via email on 5/29/2025 that this exhibit is withdrawn.*	N/a

No	Description	References[1]	LD Objections[2]
543	Max J. Rosenthal, "North Carolina GOP Brags About How Few Black People Were Able to Vote Early," Mother Jones, Nov. 7, 2016	Aug. 1, 2024 Bagley Corrected Expert Report; https://www.motherjones.com/politics/2016/11/north-carolina-gop-brags-about-how-few-black-people-were-able-vote-early/, linking to press release, https://us2.campaign-archive.com/?u=f3100bc5464cbba2f472ddf2c&id=e4b9a8fb19 *NAACP Plaintiffs represented via email on 5/29/2025 that this exhibit is withdrawn.*	N/a
544	DeJuan Hoggard, "North Carolina Supreme Court rehears voter ID case," ABC 11, Mar. 15, 2023	Aug. 1, 2024 Bagley Corrected Expert Report; https://abc11.com/voter-id-law-state-supreme-court-ruling-elections-voting/12581748/ *NAACP Plaintiffs represented via email on 5/29/2025 that this exhibit is withdrawn.*	N/a
545	Sydney Haulenbeek, "Case challenging North Carolina voter ID law set for trial," Courthouse News Service, May 3, 2024	Aug. 1, 2024 Bagley Corrected Expert Report; https://www.courthousenews.com/case-challenging-north-carolina-voter-id-law-set-for-trial/ *NAACP Plaintiffs represented via email on 5/29/2025 that this exhibit is withdrawn.*	N/a
546	Staff, Carolina Journal, "NC Supreme Court restores voter ID, reverses redistricting ruling, ends felon voting," Apr. 28, 2023	Aug. 1, 2024 Bagley Corrected Expert Report; https://www.carolinajournal.com/nc-supreme-court-restores-voter-id-reverses-redistricting-ruling-ends-felon-voting/ *NAACP Plaintiffs represented via email on 5/29/2025 that this exhibit is withdrawn.*	N/a

No	Description	References[1]	LD Objections[2]
547	Steve Doyle, "Two members of Surry County elections board ousted after refusing to certify election," Fox 8 Piedmont Triad News, Mar. 28, 2023	Aug. 1, 2024 Bagley Corrected Expert Report; https://myfox8.com/news/north-carolina/piedmont-triad/two-members-of-surry-county-elections-board-ousted-after-refusing-to-certify-election/ *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
548	Bob Hall to N.C. State Board of Electors, Nov. 18, 2022, N.C. State Board of Elections Complaint	Aug. 1, 2024 Bagley Corrected Expert Report; https://s3.amazonaws.com/dl.ncsbe.gov/State_Board_Meeting_Docs/2023-02-14/Board%20Member%20Complaints/Hall%20Complaint%20Against%20Surry%20County%20Board%20Members%20(w%20Exhibit).pdf *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
549	Hannah Shoenbaum, "North Carolina Senate advances congressional map plan that could give Republicans a 3-seat gain," AP, Oct. 23, 2023	Aug. 1, 2024 Bagley Corrected Expert Report *NAACP Plaintiffs represented via email on 5/28/2025 that this exhibit is withdrawn.*	N/a

No	Description	References[1]	LD Objections[2]
550	Greenville: the Hub of Eastern North Carolina (Greenville: Retail Merchants' Association, 1930), ECU Digital Collections	Aug. 1, 2024 Bagley Corrected Expert Report; https://digital.lib.ecu.edu/13433 *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
551	Oral History Interview with Andrew Best, October 28, 1998, ECU Digital Collections, transcript provided	Aug. 1, 2024 Bagley Corrected Expert Report; https://digital.lib.ecu.edu/39727 *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
552	Greenville-Pitt County Chamber of Commerce, "About Greenville-Pitt County	Aug. 1, 2024 Bagley Corrected Expert Report https://www.greenvillenc.org/golocal/about-greenville-pitt-county/#:~:text=With%20a%20population%20of%2093%2C137,hub%20of%20eastern%20North%20Carolina *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a

No	Description	References[1]	LD Objections[2]
553	Zach Solon, "NC residents concerned after political group canvases neighborhood questioning their voting status," WRAL News, Mar. 3, 2022	Aug. 1, 2024 Bagley Corrected Expert Report; https://www.wral.com/story/nc-residents-concerned-after-political-group-canvases-neighborhood-questioning-their-voting-status/20169571/ *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
554	Staff, "Two federal lawsuits challenge new NC elections law on the same day it's approved," The Carolina Journal, Oct. 10, 2023	Aug. 1, 2024 Bagley Corrected Expert Report; https://www.carolinajournal.com/two-federal-lawsuits-challenge-new-nc-elections-law-on-the-same-day-its-approved/	N/a
555	Kevin Morris and Coryn Grange, "Growing Racial Disparities in Voter Turnout, 2008–2022," Brennen Center for Justice, Mar. 2, 2024	Aug. 1, 2024 Bagley Corrected Expert Report *NAACP Plaintiffs represented via email on 5/28/2025 that this exhibit is withdrawn.*	N/a

No	Description	References[1]	LD Objections[2]
556	"NC Broadband Adoption Index," North Carolina Department of Information Technology, Division of Broadband and Digital Equity, North Carolina Broadband Indices	Aug. 1, 2024 Bagley Corrected Expert Report; https://experience.arcgis.com/experience/1ca29805a2454ffab6b9579702b99e59/page/page_1/; "Annual Statistical Report," 2021-2022, https://www.dac.nc.gov/fy-2021-2022-annual-statistical-reports/open *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
557	North Carolina Department of Adult Corrections, Administrative Analysis Unit, pp. 13-14	Aug. 1, 2024 Bagley Corrected Expert Report *NAACP Plaintiffs represented via email on 5/28/2025 that "this exhibit was incorrectly named. It should be a reference to the following ACS data: U.S. Census Bureau, U.S. Department of Commerce, American Community Survey, ACS 5-Year Estimates, 2021. B15002, 'Sex by Educational Attainment for the Population 25 and Older,' which is available here: https://data.census.gov/table/ACSDT5YSPT2021.B15002?t=002:004:Educational%20Attainment&g=040XX00US37&d=ACS%205-Year%20Estimates%20Selected%20Population%20Detailed%20Tables"*	
558	B28002, "Presence and Types of Internet Subscriptions in Household	Aug. 1, 2024 Bagley Corrected Expert Report; https://data.census.gov/table/ACSDT5YSPT2021.B28002?t=002:004:Telephone,%20Computer,%20and%20Internet%20Access&g=040XX00US37&d=ACS%205-Year%20Estimates%20Selected%20Population%20Detailed%20Tables	

No	Description	References[1]	LD Objections[2]
559	Kyle K. Moore, "Unemployment Rates Remained Low Through the Third Quarter of 2023 Though Labor Market Disparities Persist," Economic Policy Institute, Nov. 2023	Aug. 1, 2024 Bagley Corrected Expert Report; https://www.epi.org/indicators/state-unemployment-race-ethnicity-2023-q3/ *NAACP Plaintiffs represented via email on 5/29/2025 that this exhibit is withdrawn.*	N/a
560	U.S. Census Bureau, U.S. Department of Commerce, American Community Survey, ACS 5-Year Estimates, 2021. B27002, "Private Health Insurance Status by Sex and Age,"	Aug. 1, 2024 Bagley Corrected Expert Report; https://data.census.gov/table/ACSDT5YSPT2021.B27002?t=002:004:Health%20Insurance&g=040XX00US37&d=ACS%205-Year%20Estimates%20Selected%20Population%20Detailed%20Tables	
561	B27003, "Public Health Insurance Status by Sex and Age,"	Aug. 1, 2024 Bagley Corrected Expert Report; https://data.census.gov/table/ACSDT5YSPT2021.B27003?t=002:004:Health%20Insurance&g=040XX00US37&d=ACS%205-Year%20Estimates%20Selected%20Population%20Detailed%20Tables	

No	Description	References[1]	LD Objections[2]
562	B27001, "Health Insurance Coverage Status by Sex and Age,"	Aug. 1, 2024 Bagley Corrected Expert Report; https://data.census.gov/table/ACSDT5YSPT2021.B27001?t=002:004:Health%20Insurance&g=040XX00US37&d=ACS%205-Year%20Estimates%20Selected%20Population%20Detailed%20Tables	
563	B25044, "Tenure by Vehicles Available,"	Aug. 1, 2024 Bagley Corrected Expert Report; https://data.census.gov/table/ACSDT5YSPT2021.B25044?t=002:004:Transportation&g=040XX00US37&d=ACS%205-Year%20Estimates%20Selected%20Population%20Detailed%20Tables	
564	North Carolina Center for Health Statistics, Statistics and Reports, Minority Health: North Carolina Resident Infant Death Rates by Perinatal Care Region, County of Residence, and Race/Ethnicity	Aug. 1, 2024 Bagley Corrected Expert Report; https://schs.dph.ncdhhs.gov/data/vital/ims/2022/2022-IMR-TABLE-1B-FINAL.html *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
565	North Carolina Resident Population Health Data by Race and Ethnicity, 2022	Aug. 1, 2024 Bagley Corrected Expert Report; https://schs.dph.ncdhhs.gov/schs/pdf/NCPopHealthDatabyRaceEth2023-FINAL.pdf *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a

No	Description	References[1]	LD Objections[2]
566	Lukas Althoff and Hugo Reichardt, Jim Crow and Black Economic Progress after Slavery, The Quarterly Journal of Economics, July 11, 2024,	Aug. 1, 2024 Bagley Corrected Expert Report https://doi.org/10.1093/qje/qjae023, p. 1 *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
567	Lauren Brasil, "Fair Housing Project Releases Report: 2020 State of Fair Housing in North Carolina," Fair Housing Project of Legal Aid of North Carolina, May 18, 2021	Aug. 1, 2024 Bagley Corrected Expert Report; https://www.fairhousingnc.org/2021/fair-housing-project-releases-report-2020-state-of-fair-housing-in-north-carolina/ *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
568	Yue Qiu and Nikole Hannah-Jones, "A National Survey of School Desegregation Orders," ProPublica, Dec. 23, 2014	Aug. 1, 2024 Bagley Corrected Expert Report; https://projects.propublica.org/graphics/desegregation-orders *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a

No	Description	References[1]	LD Objections[2]
569	Joey Pitchford, "North Carolina Schools Have Lost Significant Progress in Racial Integration," N.C. State University News, May 9, 2024	Aug. 1, 2024 Bagley Corrected Expert Report; https://news.ncsu.edu/2024/05/north-carolina-schools-have-lost-significant-progress-in-racial-integration/ *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
570	Valerie Strauss, "A new story of school segregation in North Carolina: a private white-flight academy is turning charter," Washington Post, Mar. 11, 2019	Aug. 1, 2024 Bagley Corrected Expert Report; https://www.washingtonpost.com/education/2019/03/11/new-story-school-segregation-north-carolina-private-white-flight-academy-is-turning-charter/ *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
571	National Center for Education Statistics, Demographic Dashboard for Halifax County NC	Aug. 1, 2024 Bagley Corrected Expert Report; https://nces.ed.gov/Programs/Edge/ACSDashboard/3701950. *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a

No	Description	References[1]	LD Objections[2]
572	Paige Sayles, Chair, Franklin County Schools Board of Education, and Rhonda Schuler, Superintendent, to Eric L. Davis, Chair, State Board of Education, Apr. 12, 2021	Aug. 1, 2024 Bagley Corrected Expert Report; https://simbli.eboardsolutions.com/Meetings/Attachment.aspx?S=10399&AID=265835&MID=9262 *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
573	T. Keung Hui, "N.C. Board of Education rejects 2 for-profit charter schools," Raleigh News and Observer, Dec. 3, 2022	Aug. 1, 2024 Bagley Corrected Expert Report; https://www.newsobserver.com/news/local/education/article269408947.html *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
574	T. Keung Hui, "NC's public schools are now more racially segregated than they were in the 1980s," Raleigh News and Observer, May 17, 2024	Aug. 1, 2024 Bagley Corrected Expert Report; https://www.newsobserver.com/news/local/education/article288480851.html *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a

No	Description	References[1]	LD Objections[2]
575	National Center for Education Statistics, Guilford County District Directory – Schools for this District	Aug. 1, 2024 Bagley Corrected Expert Report; https://nces.ed.gov/ccd/schoolsearch/school_list.asp?Search=1&DistrictID=3701920 *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
576	Greensboro Day School	Aug. 1, 2024 Bagley Corrected Expert Report; https://www.usnews.com/education/k12/north-carolina/greensboro-day-school-310302 *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
577	Caldwell Academy	Aug. 1, 2024 Bagley Corrected Expert Report; https://www.usnews.com/education/k12/north-carolina/caldwell-academy-324803 *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
578	T. Keung Hui and Dawn Baumgartner Vaughn, "NC Senate approves expanded private school voucher funding for all," Raleigh News and Observer, May 1, 2024	Aug. 1, 2024 Bagley Corrected Expert Report; https://www.newsobserver.com/news/politics-government/article288181875.html *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a

No	Description	References[1]	LD Objections[2]
579	Daarel Burnette II, "Student Outcomes: Does More Money Really Matter?," Education Week, June 4, 2009	Aug. 1, 2024 Bagley Corrected Expert Report; https://www.edweek.org/policy-politics/student-outcomes-does-more-money-really-matter/2019/06 *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
580	Matt Barnum, "An economist spent decades saying money wouldn't help schools. Now his research suggests otherwise," Chalkbeat, May 16, 2023	Aug. 1, 2024 Bagley Corrected Expert Report; https://www.chalkbeat.org/2023/5/16/23724474/school-funding-research-studies-hanushek-does-money-matter/ *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
581	ACLU, "School-to-Prison Pipeline," Juvenile Justice	Aug. 1, 2024 Bagley Corrected Expert Report; https://www.aclu.org/issues/juvenile-justice/juvenile-justice-school-prison-pipeline *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
582	North Carolina Environmental Justice Network, "CAFOs – Distribution of Confinement,"	Aug. 1, 2024 Bagley Corrected Expert Report; https://ncejn.org/cafos/#:~:text=These%20confinement%20structures%2C%20commonly%20referred,by%20pro%2Dbusiness%20tax%20incentives%2C *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a

No	Description	References[1]	LD Objections[2]
583	North Carolina Environmental Justice Network, "North Carolina Communities Say NO Biogas,"	Aug. 1, 2024 Bagley Corrected Expert Report; https://ncejn.org/biogas/ *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
584	Kevin Morris and Coryn Grange, Brennan Center Research Report, March 2, 2024	Aug. 1, 2024 Bagley Corrected Expert Report; https://www.brennancenter.org/our-work/research-reports/growing-racial-disparities-voter-turnout-2008-2022 *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
585	Jesse Helms "Hands" Ad, YouTube	Aug. 1, 2024 Bagley Corrected Expert Report; https://www.youtube.com/watch?v=KIyewCdXMzk	Hearsay, relevance, foundation
586	Beverly Davis, "Dems On North Carolina GOP Attack Ad: 'Racist Gutter Politics,'" Huffington Post, May 1, 2008	Aug. 1, 2024 Bagley Corrected Expert Report; https://www.huffpost.com/entry/dems-on-north-carolina-go_b_98299 *NAACP Plaintiffs represented via email on 5/29/2025 that this exhibit is withdrawn.*	N/a
587	Campaign Legal Racial Appeals Repository	Aug. 1, 2024 Bagley Corrected Expert Report; https://campaignlegal.org/race-our-politics-catalog-campaign-materials	Hearsay, foundation, authentication

No	Description	References[1]	LD Objections[2]
588	Pat Woolverton, "GOP tries to connect candidate to convicted murderers," Fayetteville Observer," Apr. 1, 2018	Aug. 1, 2024 Bagley Corrected Expert Report; https://www.fayobserver.com/story/news/politics/elections/2018/04/01/nc-gop-tries-to-connect-supreme-court-candidate-to-convicted-murderers/12849100007/ *NAACP Plaintiffs represented via email on 5/29/2025 that this exhibit is withdrawn.*	N/a
589	Paul A. Specht. "Dan Forest: No nation 'has survived the diversity and multiculturalism that America faces today,'" Raleigh News & Observer, June 28, 2019	Aug. 1, 2024 Bagley Corrected Expert Report; https://www.newsobserver.com/news/politics-government/article232077907.html *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
590	Jonathan Weisman, "With Ads, Imagery and Words, Republicans Inject Race Into Campaigns," New York Times, Oct. 25, 2022	Aug. 1, 2024 Bagley Corrected Expert Report; https://www.nytimes.com/2022/10/25/us/politics/crime-ads-racism-republicans.html *NAACP Plaintiffs represented via email on 5/29/2025 that this exhibit is withdrawn.*	N/a

No	Description	References[1]	LD Objections[2]
591	Politifact, "Ted Budd said Cheri Beasley was "encouraging (riots) all across our state and all across our country in 2020,"	Aug. 1, 2024 Bagley Corrected Expert Report; https://www.politifact.com/factchecks/2022/oct/25/ted-budd/budd-takes-beasleys-protest-comments-too-far/ *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
592	Politifact, "Violent crime (is) at an all-time high,"	Aug. 1, 2024 Bagley Corrected Expert Report; https://www.politifact.com/factchecks/2022/aug/23/ben-kral/nc-trooper-wrong-about-violent-crime-hitting-recor/ *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
593	Politifact, "George Floyd's younger brother, Dejywan Floyd, has been arrested in North Carolina for a 'road rage' shooting of a white couple, killing the mother of six sitting in the passenger seat,"	Aug. 1, 2024 Bagley Corrected Expert Report; https://www.politifact.com/factchecks/2021/apr/12/viral-image/no-george-floyds-younger-brother-wasnt-arrested-mu/ *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
594	Amy Qin, "Ads from Conservative Groups Target Asian Americans," New York Times, Nov. 7, 2022	Aug. 1, 2024 Bagley Corrected Expert Report; https://www.nytimes.com/live/2022/11/07/us/election-midterm-news *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a

No	Description	References[1]	LD Objections[2]
595	Chany Chea, "Asian American Voters Targeted by Racist Mailers sent by Conservative Right Wing Organization," Asian American Advocacy Fund, Nov. 4, 2022	Aug. 1, 2024 Bagley Corrected Expert Report; https://asianamericanadvocacyfund.org/press-releases-i/asian-american-voters-targeted-by-racist-mailers-sent-by-conservative-right-wing-organization *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
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599	Andy Fox, "Truth Tracker: North Carolina State House Race as Democratic Incumbent State Representative Howard Hunter faces off with Republican Bill Ward," WAVY.com,	Aug. 1, 2024 Bagley Corrected Expert Report; https://www.wavy.com/news/politics/north-carolina-politics/truth-tracker-north-carolina-state-house-race-as-democratic-incumbent-state-representative-howard-hunter-faces-off-with-republican-bill-ward/ *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
600	Lynn Bonner, "Fewer Black legislators will represent eastern NC counties that have significant African-American populations," NC Newsline, Nov. 15, 2022	Aug. 1, 2024 Bagley Corrected Expert Report; https://ncnewsline.com/2022/11/15/fewer-black-legislators-will-represent-eastern-nc-counties-that-have-significant-african-american-populations/ *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a

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602	Kaia Hubbard, "Who is Mark Robinson? The GOP nominee for North Carolina governor has a history of inflammatory remarks," CBS News, Mar. 19, 2024	Aug. 1, 2024 Bagley Corrected Expert Report; https://www.cbsnews.com/news/mark-robinson-gop-nominee-north-carolina-governor-inflammatory-remarks/ *NAACP Plaintiffs represented via email on 5/29/2025 that this exhibit is withdrawn.*	N/a
603	Dawn Baumgartner Vaughn and T. Keung Hui, "GOP's Robinson tells Moms for Liberty he wants to get DEI out of schools, government," Raleigh News and Observer, June 20, 2024	Aug. 1, 2024 Bagley Corrected Expert Report; https://www.newsobserver.com/news/politics-government/article289209809.html *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a

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606	Brenda Sullivan, "Even at the Turning of the Tide: An Analysis of the North Carolina Legislative Black Caucus," Journal of Black Studies 30, No. 6 (2000): pp. 815-38, 828-29	Aug. 1, 2024 Bagley Corrected Expert Report *NAACP Plaintiffs represented via email on 5/28/2025 that this exhibit is withdrawn.*	N/a
607	Dan Kane, "Senate picks have familiar faces," Raleigh News and Observer, Dec. 10, 2002	Aug. 1, 2024 Bagley Corrected Expert Report *NAACP Plaintiffs represented via email on 5/28/2025 that this exhibit is withdrawn.*	N/a

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609	Will Doran, "Meet the black gun rights activist who could make history for Republicans," Charlotte News and Observer, March 06, 2020	Aug. 1, 2024 Bagley Corrected Expert Report; https://www.newsobserver.com/news/politics-government/election/article240881326.html#storylink=cpy *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
610	Gov. Roy Cooper Press Release, Feb. 16. 2023, "Governor Cooper Honors North Carolina's Black Judges and Lawyers, Proclaims Black History Month,"	Aug. 1, 2024 Bagley Corrected Expert Report; https://governor.nc.gov/news/press-releases/2023/02/16/governor-cooper-honors-north-carolinas-black-judges-and-lawyers-proclaims-black-history-month. *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
611	David McClellan, "North Carolina pollster: Is Mark Robinson electable?," Charlotte Observer, Mar. 13, 2024	Aug. 1, 2024 Bagley Corrected Expert Report; https://www.charlotteobserver.com/opinion/article286543615.html *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a

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613	Dawn Bumgartner Vaughn, "How do NC lawmakers compare to the rest of the state's population? What the date shows," Charlotte News and Observer, Feb. 14, 2023	Aug. 1, 2024 Bagley Corrected Expert Report; https://www.newsobserver.com/news/politics-government/article271897427 *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
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617	North Carolina General Assembly, 2023 Senate Demographics,	Aug. 1, 2024 Bagley Corrected Expert Report; https://webservices.ncleg.gov/ViewDocSiteFile/72728	
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619	U.S. Census Bureau, Quick Facts, North Carolina	Aug. 1, 2024 Bagley Corrected Expert Report; https://www.census.gov/quickfacts/NC	

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621	North Carolina Black Alliance, "North Carolina Black Elected Officials by County; Boards of Election lists of county officials	Aug. 1, 2024 Bagley Corrected Expert Report; https://ncblackalliance.org/about-us/ (last accessed Nov. 1, 2024)	
622	"Roll Call: Black Members of Congress," Congressional Black Caucus Foundation,	Aug. 1, 2024 Bagley Corrected Expert Report; https://avoice.cbcfinc.org/exhibits/origins-of-the-congressional-black-caucus/roll-call-black-members-of-congress/ *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a

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624	Dawn Bumgartner Vaugh, "As NC legislature debates Critical Race Theory, Black lawmakers sit on one side of the aisle," Charlotte News and Observer, July 16, 2021	Aug. 1, 2024 Bagley Corrected Expert Report https://www.newsobserver.com/news/politics-government/article252783063.html. *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
625	Mariana Alfaro, "N.C. Republican bill limits mail voting, private election funding," Washington Post, Aug. 17, 2023	Aug. 1, 2024 Bagley Corrected Expert Report; https://www.washingtonpost.com/politics/2023/08/17/north-carolina-voting-bill/ *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
626	Will Doran, "Lawmakers targeted Black voters with ID rules, NC Supreme Court says," Raleigh News and Observer, Dec. 16, 2023	Aug. 1, 2024 Bagley Corrected Expert Report; https://www.newsobserver.com/news/politics-government/article270106922.html *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a

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632	Gary D. Robertson and Hannah Schoenbaum, "North Carolina Republicans pitch Congress maps that could help them pick up 3 or 4 seats next year," AP, Oct. 18, 2023	Aug. 1, 2024 Bagley Corrected Expert Report; https://apnews.com/article/congressional-redistricting-north-carolina-42d8ae309b433f51723c4e7e4eb50b96 *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
633	Keith Rivers, "Don't let area again be 'packed & cracked,'" The Daily Advance, Sept. 23, 2023	Oct. 4, 2024 Bagley Expert Corrected Report; https://www.dailyadvance.com/opinion/editorials/rivers-column-dont-let-area-again-be-packed-cracked/article_0317c376-58a4-11ee-9591-472f3976d5b0.html *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a

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635	DeJuan Hoggard, "Henderson woman set to become city's first female and first Black mayor," ABC 11 Raleigh-Durham;	Oct. 17, 2024 Bagley Expert Reply; https://abc11.com/henderson-new-mayor-melissa-elliott-first-black/14168275/ *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
636	Meredith Poll Explores Health Care, Distracted Driving, and Voter Satisfaction, March 8, 2019;	Oct. 17, 2024 Bagley Expert Reply; https://www.meredith.edu/news/meredith-poll-explores-health-care-distracted-driving-and-voter-satisfactio *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
637	Kevin Morris, "Patterns in the Introduction and Passage of Restrictive Voting Bills are Best Explained by Race," Brennen Center for Justice, Aug. 3, 2022;	Oct. 17, 2024 Bagley Expert Reply https://www.brennancenter.org/our-work/research-reports/patterns-introduction-and-passage-restrictive-voting-bills-are-best *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a

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639	Janel George, "A Lesson on Critical Race Theory," American Bar Association, Jan. 11, 2021,	Oct. 17, 2024 Bagley Expert Reply; https://www.americanbar.org/groups/crsj/publications/human_rights_magazine_home/civil-rights-reimagining-policing/a-lesson-on-critical-race-theory/ *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
640	Deposition of Senator Ralph E. Hise Jr., Transcript Volume II, Sept. 17, 2024, pp. 530-31	Oct. 17, 2024 Bagley Expert Reply *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
641	Fred Backus and Anthony Salvanto, "Big majorities reject book bans - CBS News poll," Feb. 22, 2022,	Oct. 17, 2024 Bagley Expert Reply; https://www.cbsnews.com/news/book-bans-opinion-poll-2022-02-22/ *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a

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643	U.S. Census Bureau, "Exploring Age Groups in the 2020 Census," May 25, 2023;	Oct. 17, 2024 Bagley Expert Reply; https://www.census.gov/library/visualizations/interactive/exploring-age-groups-in-the-2020-census.html. *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
644	North Carolina's Voter ID Law, Democracy N.C.,	Mar. 17, 2025 Bagley Expert Supplemental Report; https://democracync.org/take-action/legislative-advocacy/north-carolinas-voter-id-law/ *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
645	Camila Domonoske, "Supreme Court Declines Republican Bid to Revive North Carolina Voter ID Law," May 15, 2017,	Mar. 17, 2025 Bagley Expert Supplemental Report *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a

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647	Christopher Cooper, "An Analysis of Challeged Voters in the 2024 NC Supreme Court Justice Election," Old North States Politics, Jan. 12, 2025,	Mar. 17, 2025 Bagley Expert Supplemental Report; https://www.oldnorthstatepolitics.com/2025/01/an-analysis-of-challeged-voters-in.html *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
648	Kyle Ingram, "Black NC voters twice as likely to have ballots challeged in Griffin election protests," Raleigh News & Observer, Jan. 7, 2025,	Mar. 17, 2025 Bagley Expert Supplemental Report; https://www.newsobserver.com/news/politics-government/election/article296693744.html *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a

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650	Joseph Bagley, "The Politics of White Rights: Race, Justice, and Integrating Alabama's Schools," University of Georgia Press, 2018, pp. 2, 8, 40, 188-93	Mar. 17, 2025 Bagley Expert Supplemental Report *NAACP Plaintiffs represented via email on 5/28/2025 that this exhibit is withdrawn.*	N/a
651	North Carolina DPI, List of Title I Schools 2023-2024,	Mar. 17, 2025 Bagley Expert Supplemental Report; https://www.dpi.nc.gov/documents/program-monitoring/2023-2024-esser-data/download?attachment *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
652	National Center for Education Statistics, District Demographic Dashboards, Bertie County Schools, Northampton County Schools,	Mar. 17, 2025 Bagley Expert Supplemental Report *NAACP Plaintiffs represented via email on 5/28/2025 that this exhibit is withdrawn.*	N/a

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653	Sergio Hernadez, et al., "Private School Demographics," ProPublica, Jan. 16, 2025, https://projects.propublica.org/private-school-demographics	Mar. 17, 2025 Bagley Expert Supplemental Report; https://nces.ed.gov/Programs/Edge/ACSDashboard/3700360, https://nces.ed.gov/Programs/Edge/ACSDashboard/3703420 *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
654	Lawrence Academy, ProPublica,	Mar. 17, 2025 Bagley Expert Supplemental Report; https://projects.propublica.org/private-school-demographics/schools/lawrence-academy-01012106 *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
655	Alyson Klein, "Democrat Defeats a State Schools Chief Candidate Who Called for Public Executions," Education Week, Nov. 6, 2024,	Mar. 17, 2025 Bagley Expert Supplemental Report; https://www.edweek.org/policy-politics/democrat-defeats-a-state-schools-chief-candidate-who-called-for-public-executions/2024/11 *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
656	Ahmed Jallow, "GOP superintendent candidate addresses past anti-Muslim remarks," NC Newsline, Oct. 7, 2024,	Mar. 17, 2025 Bagley Expert Supplemental Report; https://ncnewsline.com/2024/10/07/gop-superintendent-candidate-addresses-past-anti-muslim-remarks/ *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a

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658	Andrew Lawrence, "Racicst dog whistle: the right wing has weaponized 'DEI'," The Guardian, Apr. 21, 2024,	Mar. 17, 2025 Bagley Expert Supplemental Report; https://www.theguardian.com/culture/2024/apr/21/dei-language-conservatives-baltimore *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
659	Peter Baker, "Bush Made Willie Horton an Issue in 1988, and the Racial Scars Are Still Fresh," New York Times, Dec. 3, 2018,	Mar. 17, 2025 Bagley Expert Supplemental Report; https://www.nytimes.com/2018/12/03/us/politics/bush-willie-horton.html *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a

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661	Andrew Kaczynski and Em Steck, "'I'm a black NAZI!': NC GOP nominee for governor made dozens of disturbing comments on porn forum," CNN, Sept. 19, 2024,	Mar. 17, 2025 Bagley Expert Supplemental Report; https://cnn.com/2024/09/19/politics/kfile-mark-robinson-black-nazi-pro-slavery-porn-forum/index.html *NAACP Plaintiffs represented via email on 5/29/2025 that this exhibit is withdrawn.*	N/a
662	Curtis Bunn, "Black pastors rebuke Mark Robinson's reported remarks about Martin Luther King Jr.," NBC News, Sept. 20, 2024,	Mar. 17, 2025 Bagley Expert Supplemental Report; https://www.nbcnews.com/news/nbcblk/black-pastors-rebuke-mark-robinsons-reported-remarks-martin-luter-kin-rcna171944 *NAACP Plaintiffs represented via email on 5/29/2025 that this exhibit is withdrawn.*	N/a

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664	Gregory Acs, et al., "Moynihan Report Revisited," U.S. Department of Justice Office of Justice Pgrams, NCJ Number 243346, June 2013,	Mar. 17, 2025 Bagley Expert Supplemental Report; https://www.ojp.gov/ncjrs/virtual-library/abstracts/moynihan-report-revisited. *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
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666	Speech: Donald Trump Holds a Political Rally in Asheville, North Carolina, Roll Call, Aug. 14, 2024,	Mar. 17, 2025 Bagley Expert Supplemental Report; https://rollcall.com/factbase/trump/transcript/donald-trump-speech-political-rally-asheville-north-carolina-august-14-2024/ *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a

No	Description	References[1]	LD Objections[2]
667	Galen Bacharier, et al., "Trump, in final NC rally, looks for a third straight win; Harris barnstorms Pennsylvania," NC Newsline, Nov. 4, 2024,	Mar. 17, 2025 Bagley Expert Supplemental Report; https://ncnewsline.com/2024/11/04/trump-in-final-nc-rally-looks-for-a-third-straight-win-harris-barnstorms-pennsylvania/ *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
668	Speech: Donald Trump Holds a Political Rally in Raleigh, North Carolina, Roll Call, Nov. 4, 2024,	Mar. 17, 2025 Bagley Expert Supplemental Report *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
669	Speech: Donald Trump Holds a Political Rally in Fayetteville, North Carolina, Roll Call, Oct. 4, 2024,	Mar. 17, 2025 Bagley Expert Supplemental Report; https://rollcall.com/factbase/trump/transcript/donald-trump-speech-political-rally-raleigh-north-carolina-november-4-2024/ *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
670	Ali Vitale et al., "Trump referred to Haiti and African nations as 'shithole' countries," NBC News, Jan. 11, 2018,	Mar. 17, 2025 Bagley Expert Supplemental Report; https://www.nbcnews.com/politics/white-house/trump-referred-haiti-african-countries-shithole-nations-n836946 *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a

No	Description	References[1]	LD Objections[2]
671	Dr. Joseph Bagley, The Politics of White Rights, pp. 7-8	Mar. 17, 2025 Bagley Expert Supplemental Report *NAACP Plaintiffs represented via email on 5/28/2025 that this exhibit is withdrawn.*	N/a
672	Dan Carter, "From George Wallace to Newt Gingrich: Race in the Conservative Counterrevolution, 1963-1994," Baton Rouge: Lousiana State University Press, 1999	Mar. 17, 2025 Bagley Expert Supplemental Report *NAACP Plaintiffs represented via email on 5/28/2025 that this exhibit is withdrawn.*	N/a
673	Natalie Allison, "'We can't take a chance': Trump barnstorms North Carolina in the final stretch," Politico, Nov. 2, 2024,	Mar. 17, 2025 Bagley Expert Supplemental Report; https://www.politico.com/news/2024/11/02/trump-north-carolina-campaigning-00186944 *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
674	Amanda Terkel, "'Dumb' and a 'DEI' candidate: Trump and allies attack Kamala Harris based on her race, gender," NBC News, July 24, 2024,	Mar. 17, 2025 Bagley Expert Supplemental Report; https://www.nbcnews.com/politics/2024-election/republican-attacks-kamala-harris-center-race-gender-dumb-dei-candidate-rcna 162570 *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a

No	Description	References[1]	LD Objections[2]
675	Merlyn Thomas and Mike Wendling, "Trump repeats baseless claim about Haitian immigrants eating pets," BBC News, Sept. 15, 2024,	Mar. 17, 2025 Bagley Expert Supplemental Report; https://www.bbc.com/news/articles/c77128myezko *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
676	Dan Parsons, "New Joe Biden campaign ad slams Donald Trumps 'racist' Black jobs comment," Florida Politics, July 3, 2024,	Mar. 17, 2025 Bagley Expert Supplemental Report; https://floridapolitics.com/archives/682787-new-joe-biden-campaign-ad-slams-donald-trumps-racist-black-jobs-comment *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
677	Cheyanne M. Daniels, "Biden campaign hits trump over 'Black jobs' remark in new ad," The Hill, July 3, 2024	Mar. 17, 2025 Bagley Expert Supplemental Report; https://thehill.com/homenews/campaign/4753990-biden-campaign-ad-trump-black-jobs *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
678	Joe Biden, "Not For Us Radio: 60| Biden-Harris 2024," YouTube, July 2, 2024,	Mar. 17, 2025 Bagley Expert Supplemental Report; https://www.youtube.com/watch?v=oiaR_yaJfGM	Hearsay, relevance, foundation

No	Description	References[1]	LD Objections[2]
679	Blair Shiff and Stephanie Johnson, "Racist text messages sent out following presidential election to students in the Carolinas," WCNC, Nov. 7, 2024,	Mar. 17, 2025 Bagley Expert Supplemental Report; https://www.wcnc.com/article/tech/racist-text-message-pick-cotton-plantation-brown-van/275-77ba87fc-c3e5-4d6e-9016-9d2af6cccad6 *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
680	North Carolina Board of Elections, Official General Election Results - Statewide, Nov. 5, 2024,	Mar. 17, 2025 Bagley Expert Supplemental Report; https://er.ncsbe.gov/?election_dt=11/05/2024&county_id=0&office=NCS&contest=0	
681	North Carolina, Current Maps, Dave's Redistricting,	Mar. 17, 2025 Bagley Expert Supplemental Report; https://davesredistricting.org/maps#state::NC	Hearsay, relevance, foundation
682	North Carolina State Board of Elections, Official General Election Results - Statewide, Council of State, Nov. 5, 2024,	Mar. 17, 2025 Bagley Expert Supplemental Report; https://er.ncsbe.gov/?election_dt=11/05/2024&country_id=0&office=COS&contest=0	
683	North Carolina State Board of Elections, Official General Election Results - Statewide, State Senate, Nov. 5, 2024,	Mar. 17, 2025 Bagley Expert Supplemental Report; https://er.ncsbe.gov/?election_dt=11/05/2024&country_id=0&office=NCS&contest=0	

No	Description	References[1]	LD Objections[2]
684	North Carolina State Board of Elections, Official General Election Results - Statewide, State House, Nov. 5, 2024,	Mar. 17, 2025 Bagley Expert Supplemental Report; https://er.ncsbe.gov/?election_dt=11/05/2024&country_id=0&office=NCH&contest=0	
685	NC State Senate maps/data, Dave's Redistricting 2020,	Mar. 17, 2025 Bagley Expert Supplemental Report; https://davesredistricting.org/maps#viewmap::9157bd00-cfbb-4d32-9b01-ce7f38e53dlf	Hearsay, relevance, foundation
686	NC State House maps/data, Dave's Redistricting 2020	Mar. 17, 2025 Bagley Expert Supplemental Report; https://davesredistricting.org/maps#viewmap::42841 eaa-3a00-49ce-ba28-77726707251a	Hearsay, relevance, foundation
687	NC 2024 Congressional map/data, Dave's Redistricting 2020,	Mar. 17, 2025 Bagley Expert Supplemental Report; https://davesredistricting.org/maps#viewmap::4f133eac-adb1-4bb4-a7fe-92aa8a5f1ed4	Hearsay, relevance, foundation
688	North Carolina Board of Elections, Official General Election Results - Statewide, Federal, Nov. 5, 2024,	Mar. 17, 2025 Bagley Expert Supplemental Report; https://er.ncsbe.gov/?election_dt=11/05/2024&county_id=0&office=FED&contest=0	
689	https://ballotpedia.org/North_Carolina_State_Senate_elections,_2024	Mar. 17, 2025 Bagley Expert Supplemental Report *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
690	https://ballotpedia.org/North_Carolina_House_of_Representatives_elections,_2024	Mar. 17, 2025 Bagley Expert Supplemental Report *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a

No	Description	References[1]	LD Objections[2]
691	https://www.ncfamilyvoter.com/candidate/williams-lillie	Mar. 17, 2025 Bagley Expert Supplemental Report *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
692	North Carolina African American Leaders Condemn Mark Robinson's Attacks On The Civil Rights Movement," NCDP, May 12, 2023,	Mar. 17, 2025 Bagley Expert Supplemental Report; https://www.ncdp.org/media/nc-af-am-leaders-condemn-robinson-attacks-on-civil-rights-movement/ *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
693	Meredith Poll , Feb. 2024, p. 110,	Mar. 17, 2025 Bagley Expert Supplemental Report; https://www.meredith.edu/wp-content/uploads/2024/02/February-2024-Poll-Report.pdf *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
694	Clayton Henkel, "Lt. Gov. Mark Robinson sees support erode even among Republicans in new poll," NC Newsline, Oct. 2, 2024,	Mar. 17, 2025 Bagley Expert Supplemental Report; https://ncnewsline.com/briefs/lt-gov-mark-robinson-sees-support-erode-even-among-republicans-in-new-poll/ *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a

No	Description	References[1]	LD Objections[2]
695	Paul Woolverton, GOP tries to connect candidate to convicted murderers, The Fayetteville Observer, Apr. 1, 2018	Bagley Dep. Ex. 4 *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
696	Kamala Harris posting on X, "Kamala Harris will create an Opportunity Agenda for Black Men	Bagley Dep. Ex. 5 *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
697	Exhibit 6 to Dr. Joseph Bagley Oct. 30, 2024 Deposition, Screenshot of Legislative Calendar for Sept. 2023	Bagley Dep. Ex. 6 *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a
698	Ferrell Guillory, "In national report on inequitable school funding, North Carolina an exception," EdNC, Mar. 8, 2019,	Bagley Dep. Ex. 7; https://www.ednc.org, accessed on Oct. 30, 2024 *This exhibit is withdrawn per NAACP Plaintiffs' Amended Exhibit List filed on 05/29/2025.*	N/a